

WPWC Data Protection Complaints Procedure

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Approved by: WPWC Committee

1. Purpose

This procedure sets out how West Pennine Windsurfing Club (**WPWC**) handles complaints from individuals (data subjects) regarding the processing of their personal data. It ensures compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The aim is to ensure complaints are dealt with promptly, fairly, and transparently.

2. Scope

This procedure applies to any complaint relating to:

- How WPWC collects, uses, stores, or shares personal data.
- Breaches of data protection rights (e.g. access, rectification, erasure, restriction, or objection).
- Any other concerns about WPWC's data protection practices.

3. How to Submit a Complaint

Anyone can raise a data protection complaint. You do not need to be a current member.

Preferred method:

Please send your complaint by email to: committee.wpwc@membermojo.co.uk

You should include:

- Your full name and contact details.
- Details of the complaint (what happened, when, and why you believe there is a data protection issue).
- Any supporting evidence (where relevant).
- What outcome you are seeking.

Alternative routes:

Complaints may also be given verbally or in writing to any WPWC Committee member, who must forward the details to committee.wpwc@membermojo.co.uk as soon as possible (and no later than 5 working days).

4. Receipt and Acknowledgement

- All complaints received at committee.wpwc@membermojo.co.uk will be logged by the **Membership Secretary** (or another designated Committee member if the Membership Secretary is unavailable or conflicted).
- The Membership Secretary will send an **acknowledgement** within 30 **working days** of receipt.

- The acknowledgement will:
 - Confirm receipt of the complaint.
 - Give an expected timescale for the investigation (normally no more than 30 days from receipt).
 - Name the person handling the complaint.

5. Assessment of the Complaint

The Membership Secretary (or nominated lead) will carry out an initial assessment to:

- Determine whether the complaint falls under data protection legislation.
- Assess the seriousness and urgency.
- Identify any immediate risks (e.g. potential data breach).
- Decide whether an independent investigator is required (for complex or serious cases).

If the complaint is not a data protection matter, the complainant will be informed and, where appropriate, directed to the correct procedure (e.g. general complaints procedure).

6. Investigation

- The investigation will be conducted fairly and objectively.
- The Membership Secretary (or appointed investigator) will:
 - Gather relevant information and evidence.
 - Review relevant policies, procedures, and records.
 - Speak to relevant Committee members or volunteers who handled the data.
 - Consider the rights and legitimate interests of all parties.
- All Committee members and volunteers must cooperate fully with any investigation.
- The investigation should normally be completed within **20–30 working days**. If a longer period is required, the complainant will be notified with a revised timescale and the reason for the delay.

7. Response to the Complainant

The complainant will receive a written response (normally by email) from the Membership Secretary that includes:

- A summary of the investigation findings.
- The conclusion reached.
- Any remedial action WPWC has taken or will take.
- An explanation of their right to escalate the matter if they remain dissatisfied (see Section 8).

The response will be clear, easy to understand, and free of unnecessary jargon.

8. Escalation and Appeals

If the complainant is not satisfied with WPWC's response, they may:

1. Request an internal review by a different Committee member. This request must be made within **14 days** of receiving the response.
2. Complain directly to the **Information Commissioner's Office (ICO)** at any time: **www.ico.org.uk** or telephone 0303 123 1113.

WPWC will cooperate with any ICO investigation.

9. Record Keeping

- All complaints, acknowledgements, investigation notes, and responses will be recorded and retained for a minimum of **5 years** in accordance with WPWC's data retention policy.
- Records will be stored securely and treated as confidential.

10. Monitoring and Learning

The Committee will review data protection complaints annually (or more frequently if several complaints arise) to identify any trends or required improvements to policies and practices.

11. Responsibilities

- **Membership Secretary:** Primary point of contact and lead for handling complaints.
- **All Committee Members:** Must forward complaints promptly and cooperate with investigations.
- **Chair / Committee:** Overall responsibility for ensuring this procedure is followed and for approving any significant remedial actions.

Contact for Queries

Membership Secretary

Email: committee.wpwc@membermojo.co.uk