

42BR Barristers – Data Protection Complaints Procedure

Version 1.1

1. Purpose

42BR Barristers is committed to handling personal data in accordance with the UK GDPR and Data Protection Act 2018.

This procedure sets out how individuals can raise a complaint regarding how their personal data has been handled, and how Chambers will respond.

2. Scope

This procedure applies to:

- Clients (lay and professional)
- Barristers
- Staff and contractors
- Third parties whose personal data is processed

It covers complaints relating to any aspect of personal data handling by Chambers.

3. What is a Data Protection Complaint?

A data protection complaint is any expression of dissatisfaction about how Chambers has handled personal data.

This may include concerns about:

- How personal data has been collected, used, or shared
- Responses to data subject rights requests (e.g. access, rectification, erasure)
- Accuracy or retention of personal data
- Security of personal data (including incidents or breaches)

This is separate from general service or professional conduct complaints, which are handled under the Chambers Complaints Procedure.

4. How to Make a Complaint

Individuals may submit a complaint using any of the following methods:

- Email
- Telephone
- Post

- In person, through any members of chambers staff

Complaints should be directed to:

- Data Protection Manager (DPM)
- Chambers Director (currently Vincent Denham)

Complaints will be accepted regardless of how they are submitted and do not need to reference data protection legislation.

Information on how personal data is processed, and contact details, are set out in Chambers' Privacy Notice.

5. Acknowledgement

Chambers will acknowledge receipt of a data protection complaint within 30 days of receipt or, where identity verification is required, within 30 days of receiving sufficient information to verify the identity of the individual making the complaint.

The acknowledgement will confirm:

- That the complaint is being investigated
- The expected next steps

6. Investigation

Chambers will conduct a proportionate investigation to:

- Assess the nature of the complaint
- Reviewing relevant systems, records, documentation, conversations and actions
- Make enquiries with relevant barristers, staff, or third parties where required.

The complainant will be kept informed of progress where appropriate.

Investigations will be conducted without undue delay.

7. Outcome

Once the investigation is complete:

- Chambers will provide a response explaining:
 - The findings of the investigation
 - Any actions taken or proposed
- This will be provided without undue delay

8. Escalation to the ICO

Complaints should normally be raised with Chambers in the first instance.

If an individual is not satisfied with the outcome, they may escalate their complaint to the Information Commissioner's Office (ICO).

Chambers will inform individuals of this right where appropriate.

9. Record Keeping

Chambers will maintain a record of the below for 7 years from the date the complaint was responded to in full:

- Complaints received
- Actions taken
- Outcomes

This supports accountability and compliance with data protection obligations.

10. Processors and sub-processors

Where we engage a processor or sub-processor, we will require, through written contracts, that we are notified promptly of any complaints they receive about personal data processed on our behalf, and to co-operate in our handling of them.

11. Review

This procedure will be reviewed periodically and updated where required to reflect changes in legislation or regulatory guidance.