



SwiftScript 
**Virtual Assistant
Business Support**

Data Complaints Policy



1. Introduction

SwiftScript is committed to providing high-quality services and values all feedback, including data complaints. I recognise that learning from data complaints helps me improve my services.

This policy sets out how I handle data complaints, including those that may be considered vexatious or unreasonably persistent, in line with guidance from the ICO.

2. Accessibility and Transparency

This policy is available on my website and in alternative formats upon request.

I am committed to making my data complaints process accessible to all, including people with disabilities or additional needs.

All stages, timescales, and escalation routes are clearly outlined.

3. What is a Data Complaint?

A data complaint is an expression of dissatisfaction about any aspect of SwiftScript's data processing, use and storage. Anyone who provides data to SwiftScript can make a complaint.

4. Complaints Procedure

Stage 1: Informal Resolution

Raise the issue in writing or via email with the relevant staff member within two months of the incident.

I will acknowledge your complaint, usually via email, within 7 working days and am legally obliged to fully respond within 30 days.

Stage 2: Formal Complaint

If unresolved, escalate in writing or via email to the Complaints Officer (or Owner/Founder as appropriate) (see contact details below) within 28 days of the Stage 1 response.

I will acknowledge your complaint, usually via email, within 14 days and aim to respond within 28 days.

External Referral

If you believe your data complaint has not been handled appropriately, you may contact the ICO or Advertising Standards Authority as appropriate.

5. Vexatious or Unreasonably Persistent Complaints

Definition

I adopt the Local Government Ombudsman's definitions of "unreasonable complainant behaviour" and "unreasonable persistent complaints." These are complaints or behaviours that, due to their frequency or nature, hinder my ability to investigate or respond fairly.



Examples of Vexatious Behaviour

- Repeated, groundless complaints.
- Refusal to accept outcomes or cooperate with the process.
- Harassment, abusive or threatening language.
- Excessive or scattergun communication.
- Persistently raising new issues or changing the basis of the data complaint without justification.

Managing Vexatious Complaints

I will ensure every data complaint is properly investigated before considering restrictions.

If disruptive behaviour continues, I may restrict contact (with written notice and a copy of this policy). In extreme cases, I may refuse all contact or involve authorities.

New data complaints from individuals previously deemed vexatious will be considered on their merits. Raising legitimate concerns or dissatisfaction will not in itself lead to someone being labelled vexatious.

6. Safeguarding and Support

If a complainant is unwell or vulnerable, I will offer support or signpost to appropriate services, including crisis teams.

I am committed to treating all complainants with dignity and respect.

7. Record Keeping and Confidentiality

All data complaints and actions taken are recorded and retained confidentially for a minimum of 7 years, in line with data protection requirements. This retention period aligns with HMRC requirements and ensures I can respond to any legal or regulatory queries.

I process personal data contained in complaints under the lawful basis of legitimate interests, and where relevant, legal obligation.

Details of individuals subject to vexatious restrictions are recorded.

Confidentiality will be maintained except where disclosure is required by law or necessary to protect someone from harm.

I comply with all relevant data protection and confidentiality laws.

8. Exercising Data Rights

Complainants may request access to their data or exercise other UK GDPR rights by contacting our Data Protection Lead at info@swiftscript.co.uk.



info@swiftscript.co.uk



www.swiftscript.co.uk



07707 404505



Colchester, Essex

9. Learning and Improvement

I regularly review data complaints to identify trends and improve our services. Anonymised complaint data is reported to the ICO and, where appropriate, to stakeholders.

This policy is reviewed annually, or after significant data complaints, to ensure it remains effective and up to date.

Contact Details:

Complaints Officer: info@swiftscript.co.uk

Address: SwiftScript
7 Barbour Gardens
Colchester
Essex
CO2 9SA

This policy is designed to ensure that all data complaints are handled fairly, consistently, and transparently, while protecting staff from unacceptable behaviour.



info@swiftscript.co.uk



www.swiftscript.co.uk



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