

## **1. Purpose**

NODA is committed to protecting personal data and handling all personal information fairly, lawfully and transparently.

This procedure explains how individuals may raise concerns or complaints regarding the way NODA handles personal data and how those complaints will be managed.

This procedure is intended to comply with the requirements of the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 together with guidance issued by the [Information Commissioner's Office \(ICO\)](#).

## **2. Scope**

This procedure applies to complaints relating to:

- The handling of personal data;
- Subject Access Requests (SARs);
- Data accuracy;
- Data retention;
- Data sharing;
- Data security or breaches;
- Consent;
- Direct marketing communications;
- Any other matter relating to data protection legislation.

This procedure applies to complaints made by:

- Members;
- Volunteers;
- Employees;
- Contractors;
- Third parties;
- Members of the public.

## **3. How to Make a Complaint**

Complaints may be submitted:

- By email;
- In writing;
- Via electronic forms;
- Or by any other reasonable communication method.

Complaints should be directed to: **Dale Freeman – Data Protection Manager**  
National Operatic & Dramatic Association (NODA)  
Email: [dale@noda.org.uk](mailto:dale@noda.org.uk)

## **4. Complaint Handling Process**

### **Stage 1 – Acknowledgement**

NODA will acknowledge receipt of the complaint within **30 calendar days** of receipt.

The acknowledgement will:

- Confirm the complaint has been received;
- Outline the next steps;
- Provide an estimated timeframe for response where possible.

### **Stage 2 – Investigation**

The complaint will be reviewed by the Data Protection Manager or an appropriately authorised individual.

The investigation may include:

- Reviewing relevant records and correspondence;
- Speaking with staff or volunteers involved;
- Reviewing policies and procedures;
- Assessing compliance with applicable legislation.

Where necessary, NODA may request further information from the complainant.

### **Stage 3 – Outcome**

NODA will issue a written response without undue delay.

The response may:

- Uphold the complaint;
- Partially uphold the complaint;
- Or reject the complaint where no breach is identified.

Where appropriate, NODA may:

- Correct inaccurate data;
- Amend procedures;
- Provide explanations;
- Restrict processing;
- Delete data where legally appropriate;
- Take remedial action.

## **5. Escalation to the ICO**

If the complainant remains dissatisfied following NODA's response, they may refer the matter to the [Information Commissioner's Office \(ICO\)](#).

NODA encourages complainants to allow the organisation the opportunity to resolve concerns before contacting the ICO.

## **6. Record Keeping**

NODA will maintain records of:

- Complaints received;
- Investigations undertaken;

- Outcomes issued;
- Actions taken.

These records will be retained in accordance with NODA's retention policies and applicable legal obligations.

### **7. Confidentiality**

Complaints will be handled confidentially and only shared with individuals who require access to investigate or resolve the matter.

### **8. Vexatious or Excessive Complaints**

NODA reserves the right to manage repetitive, abusive or manifestly unfounded complaints appropriately and in accordance with applicable legislation and ICO guidance.

### **9. Review of Procedure**

This procedure will be reviewed periodically to ensure continued compliance with:

- UK GDPR;
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- ICO guidance.

### **Approved By:**

Board of Trustees – National Operatic & Dramatic Association

### **Responsible Officer:**

Chief Operating Officer / Data Protection Manager

**Review Date:** 19<sup>th</sup> June 2028

**Version:** 1.0