

Data Protection Complaints Procedure

Approved by:	Effective date:	Next review:
Senior Management Team	October 2025	October 2027

Procedure statement

Canterbury Christ Church University is committed to respecting, protecting, and enabling the rights of individuals under data protection law. We recognise the importance of transparency, fairness, and accountability in the way we handle personal data.

We strive to uphold the highest standards in the processing of personal data and ensure that individuals are treated with dignity and respect. Our complaints procedure supports individuals in raising concerns, asking questions, and exercising their rights in a safe and accessible manner.

We encourage anyone who feels that their data has not been handled appropriately to notify us so that we can investigate promptly, resolve issues fairly, and continually improve our practices.

Who needs to know about the procedure?

- Deans and Associate Deans
- Heads of School and Department
- Teaching Staff
- Managers, supervisors and administrators
- Students
- Applicants

Purpose of the procedure

This procedure outlines how the University receives, investigates, and responds to complaints from individuals who believe their rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act (DPA) 2018 have not been respected.

It addresses the Data (Use and Access) Act 2025, Section 102, and reflects the best practice guidance of the Information Commissioner's Office (ICO), which is to be renamed the Information Commission.

Contacts

The University Information Governance team is responsible for:

- Providing advice and assistance
- Guidance and templates
- Accessing training

The team can be contacted by emailing: dp.officer@canterbury.ac.uk

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1. When You Can Complain

You may raise a concern if you believe the University has not handled your personal data following data protection law.

It includes concerns about how the University has managed your data or that of someone else.

You may complain, for example, if the University:

- Has not properly responded to your request for your personal information (a subject access request)
- Is not keeping your personal data secure
- Holds inaccurate or outdated personal information
- Has disclosed your information without proper authorisation
- Is keeping your personal information for longer than necessary
- Collected your information for one purpose and is using it for another
- Failed to uphold your data protection rights

We welcome complaints submitted in good faith and will handle them professionally and confidentially.

2. Your Information Rights

Under the UK GDPR and the DPA 2018 (as amended), you have several important rights in relation to your personal data. These include the right to:

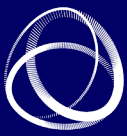
- Access the personal data we hold about you;
- Request that we correct inaccurate or incomplete data;
- Request that we delete your personal data where appropriate;
- Restrict or object to our use of your data;
- Request that your data be transferred to another organisation (data portability), where applicable.

We are committed to enabling these rights and supporting individuals who wish to exercise them. If you believe your rights have not been respected, we encourage you to raise your concerns as early as possible so we can work with you to resolve them.

3. How to Make a Complaint

If you wish to complain about how we have handled your personal data, please contact us directly so we can try to rectify the situation.

Please include:



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- Your name and contact details;
- Any reference numbers that can help identify you or your complaint;
- A clear description of the issue;
- Copies of any relevant documents (please do not send originals);
- A description of the outcome you are seeking.

4. Submit your complaint by:

- **Online:** [Data Protection Complaint Form](#)
- **Post:**
Data Protection Officer
Canterbury Christ Church University
North Holmes Road
Canterbury CT1 1QU

We will acknowledge your complaint within **30 calendar days**.

5. Timescale for Making a Complaint

It is both in your and the University's interests that you make your complaint as quickly as possible.

Issues need raising as they arise. Delays could make it difficult to investigate properly.

If you want to complain, you are to do so within three months of receiving our service. Waiting longer than that could affect our ability to investigate your complaint.

We reserve the right not to consider the matter if you make the complaint later than three months after receiving our service or the last meaningful contact with us.

6. Our Approach to Investigating Complaints

We will:

- Review your complaint thoroughly;
- Make enquiries with relevant colleagues or departments;
- Keep you informed of progress;
- Respond to your complaint **without undue delay**.

We aim to respond to your complaint within 30 calendar days of sending our acknowledgement of your complaint.

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If your concern is complex or requires more time to resolve, we will notify you and provide an estimated timeframe for a complete response.

7. How We Will Handle Your Complaint

When you submit a data protection complaint, the University is committed to treating your concerns seriously, investigating them fairly, and responding in a timely and transparent way.

a. Initial Review and Early Resolution

Most of the time, the member of staff who initially handled your request or enquiry will review your complaint first. If appropriate, they will attempt to resolve your concern promptly by providing additional information, clarification, or correction. Many complaints can be resolved at this early stage, especially where concerns arise from misunderstandings or a lack of clarity.

We encourage open dialogue during this stage. By better understanding your concerns, we may meet your needs without requiring a formal investigation.

b. Escalation to Reviewing Officer

If your complaint cannot be resolved informally, or if early resolution is not appropriate, it will be referred to the Data Protection Officer (DPO). The DPO may investigate the complaint as the reviewing officer or give it to an independent reviewing officer.

The reviewing officer will not be the person who made the original decision, although they may consult with relevant staff to gain a thorough understanding of the context.

The reviewing officer will:

- Thoroughly review the facts and the University's handling of the matter
- Consider your representations and any supporting evidence you provide
- Make enquiries about the subject of the complaint to the extent appropriate
- Liaise with relevant University staff as appropriate
- Determine whether the University has complied with its legal obligations under the UK GDPR and DPA 2018
- Identify any actions necessary to rectify the situation
- Recommend how to improve University practices

c. Response Times and Outcomes

The reviewing officer will aim to respond to your complaint in writing within **30 working days** from the day after your complaint is acknowledged.

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If it is not possible to fully respond within that time (e.g. because of complexity or the need for further enquiries), we will inform you and provide a revised target date.

If your complaint is upheld, the reviewing officer will:

- Explain the findings and confirm which aspects of your complaint have been upheld;
- Set out what steps the University will take to remedy the situation (e.g. issuing a corrected response to a data rights request, amending inaccurate data, or changing internal processes);
- Ensure that any actions affecting you are carried out as soon as reasonably practicable and within **30 working days** of the decision.

Where appropriate, the reviewing officer may also identify recommendations for improvements, which will be shared with the relevant departments or oversight groups for further consideration.

d. If Your Complaint Is Not Upheld

If the reviewing officer does not uphold your complaint, you will receive a written explanation of the reasons for this decision. You will also be advised of your right to escalate the matter to the Information Commission, the UK's independent data protection authority.

e. Data Handling

We will handle any personal information you provide as part of your complaint following our [Information Governance Privacy Notice](#). Your information will be used solely for investigating and responding to your complaint.

f. Outcomes and Follow-Up

Where a complaint is upheld, we may:

- Issue a revised response to your rights request;
- Rectify or delete inaccurate or excessive personal data;
- Update internal practices and training;
- Offer a full explanation and apology where appropriate.

If we do not uphold your complaint, we will explain why.

As part of any response we make to you, we will inform you of your right to escalate the matter to the Information Commission.

8. Vexatious or Excessive Complaints

The University is committed to respectful and fair engagement. However, we reserve the right to refuse to investigate complaints that are manifestly unfounded, excessive, or repetitious. If we make such a

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determination, we will clearly explain the reasons and provide you with the right to review by a senior member of staff at the University.

9. Complaining to the Information Commissioner's Office (ICO)

If you are not satisfied with the outcome of your complaint or our handling of it, you have the right to contact the ICO:

- **Website:** <https://ico.org.uk>
- **Phone:** 0303 123 1113
- **Post:**
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF

We recommend including our written response and any relevant documents if you choose to escalate your complaint.

The ICO will be renamed the Information Commission.

10. Record Keeping and Reporting

The University maintains a log of all complaints received under this procedure. It includes:

- Date received and acknowledged
- Summary of the issue
- Investigation actions and findings
- Final response and outcome
- Any follow-up actions or lessons learned

We use this information to review performance, improve our practices, and ensure readiness should statutory reporting obligations arise.

11. Accessibility and Support

If you need help in raising your complaint or would like this information in a different format (e.g. large print, audio, translation), we will make reasonable adjustments. Just contact us at:

dp.officer@canterbury.ac.uk

12. Related Policies and Guidance

- Data Protection Policy



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- [Information Governance Privacy Notice](#)
- [FOI/EIR Complaints Procedure](#)
- ICO guidance: [Raising a concern](#)

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