

Freedom of Information & Environmental Information Regulations Complaints Procedure

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

Canterbury Christ Church University is committed to being transparent, fair, and responsive when handling requests for information.

If you are unhappy with how we handled your request, whether due to delays, the information provided, or our management of it, you have the right to raise a concern.

We understand that making a complaint or asking for a review can feel daunting. This Procedure is to support you through the process clearly and respectfully.

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

The Procedure sets out how the University will receive, review, and respond to complaints relating to:

- Requests made under the Freedom of Information Act 2000 (FOIA) and
- Requests made under the Environmental Information Regulations (EIR) 2004.

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. What this procedure covers

There are two types of concerns you might wish to raise:

a. Complaint

A complaint is an expression of dissatisfaction regarding the handling, timeliness, communication, or customer service related to an FOI or EIR request rather than the outcome itself.

It is about how your request was handled (e.g., delay, tone, format, or support).

A complaint is managed in accordance with our Freedom of Information (FOI) and Environmental Information (EIR) Complaints Procedure (see Section 3 below).

b. Internal Review

An internal review is a formal request for the University to reconsider the decision made in response to an FOI or EIR request.

It is about the decision we made (e.g. we refused your request, we used an exemption, we redacted information, or the response is incomplete or misleading).

An internal review is managed under the FOI/EIR Internal Review Process (see Section 4 below)

2. How to Raise a Complaint or Request a Review

You must contact us within 40 working days of receiving our original response.

Your complaint or request for review should be in writing, clearly stating what you are dissatisfied with.

What to include:

- Your name and contact details;
- The reference number of your original request (if available; it is usually found at the top of the University's response);
- A clear description of your concern;
- Whether it's a complaint, a request for review, or both; and
- Any supporting documents you feel are relevant.

Where to send it:

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- **Online:** [Data Protection Complaint Form](#)
- **Post:**

Information Governance Team
Governance and Legal Services
Canterbury Christ Church University
North Holmes Road
Canterbury CT1 1QU

There is no charge for making a complaint or requesting an internal review.

Acknowledgement

Once we receive your concern, we'll acknowledge it within five working days.

Initial Assessment

We'll assess your complaint to determine whether it concerns the handling of your request (a **complaint**) or the actual decision made (an **internal review**). Sometimes, it may be both, and we will treat it accordingly.

We'll let you know how we will handle your concern and when you can expect a response.

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 as needed.

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 an internal review. However, this does not preclude your right to request an internal review.

3. Complaint about service or handling

You may submit a complaint if you are dissatisfied with:

- The time taken to respond to your request
- Failure to acknowledge or confirm your request
- The format we provided the information
- A perceived lack of advice or assistance in making a valid request

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- The professionalism or tone of communications
- Issues relating to the Freedom of Information Publication Scheme

You must make the complaints within 40 working days of the response or last relevant interaction.

What happens next:

- We will acknowledge your complaint within five working days;
- It will be investigated by the Information Governance Manager or an appropriate officer not involved in the original handling;
- We will generally issue a written response within 20 working days;
- Where the response cannot be issued within that period, for instance, due to the complexity of your complaint, we will tell you of the delay and the revised response date.

4. Internal Review of the Decision

You may request an internal review if you believe that:

- We wrongly withheld the Information
- Exemptions or exceptions were applied incorrectly
- The response was incomplete, unclear, or legally deficient.

You must request the internal review **in writing** within **40 working days** of the date of the University's response. You should

- Clearly explain the grounds for your disagreement with the original decision;
- Reference your original request and any relevant correspondence.

Internal review process

Your request will be allocated to a reviewing officer who had no role in the original decision. It is a single-stage process designed to produce a timely decision for the requester.

The reviewing officer will reassess the response in line with the FOIA or EIR, including:

- Considering your arguments or representations and any new information you provide
- Re-examining your request and our response
- Reviewing all documentation
- Consulting the original decision-makers where necessary

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- Reconsidering the decision in full, including any public interest tests
- Reassessing any exemptions, exceptions, or decisions made
- Applying a different or additional exemption(s) or exception(s)

The review will always maintain a fresh look rather than merely reiterating our original reply. It is genuinely possible to amend or reverse our previous decision.

We will generally issue a written internal review outcome within **20 working days**.

In the event that we require clarification of an internal review request from you, the 20 working day period will not begin until it is received.

If an internal review is complex, requires consultation with third parties, or involves a high volume of relevant information, we may need more than 20 working days to consider the issues and respond. It may take up to **40 working days** in complex cases.

If we need more time, we'll explain why and tell you when you can expect a reply.

Potential Outcomes

The internal review outcome may result in the following:

- **Upheld:** The review confirms the original decision as correct and compliant with the relevant legislation. We will explain why the exemptions or exceptions were correctly applied or why we stated that we did not hold the information.
- **Amended:** This means we partially uphold your concern and will outline the changes, the reasons behind them, and when you can expect the revised response. We may disclose some information or revise some exemptions or exceptions. For example, we may disclose further information or apply a different exemption.
- **Overtured:** The internal review finds that the original decision was incorrect. We will issue a revised response and disclose the information accordingly, in accordance with our legal obligations. Where applicable, we will apologise and take steps to prevent similar issues from recurring.

You'll receive a written reply with:

- What decision we reached;
- Why we reached it, with reference to legislation and any balancing of public interest
- What steps we will take next (if any),
- How and when we will implement those steps

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- Provide the information you originally requested immediately, where we reverse our decision to withhold information; if this is not possible, we will tell you how soon we will provide the information.
- If we find that we made a mistake or didn't meet our obligations, we may apologise and explain what went wrong.
- If the review identifies any other failings, outline when and how we intend to correct them and take appropriate steps to prevent any problems from recurring in the future.
- How to escalate your concern to the ICO if you are dissatisfied with the outcome.

5. What if You're Still Unhappy

If you are not satisfied with our final response, you can contact the Information Commissioner's Office (ICO) to investigate your concern.

ICO Contact Details:

- ico.org.uk
- 0303 123 1113
- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You should provide them with a copy of your original request, our response, and your complaint or review.

The ICO will be renamed the Information Commission.

6. How We Use Complaints to Improve Our Service

We keep a record of all FOI and EIR complaints and internal reviews. We use this information to:

- Monitor trends;
- Identify training needs;
- Improve our procedures and systems.

Your feedback helps us serve everyone better.

7. Accessibility and Support

Should you need assistance in raising your concern or would like this information in a different format (e.g., large print, audio, translation), we will make reasonable adjustments to accommodate your needs. Just contact us at:

foi@canterbury.ac.uk

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8. Publication of Our Procedure

Our Freedom of Information and Environmental Information Regulations Complaints and Internal Review Procedure is published:

- [In our Publication Scheme](#)
- [On the Governance and Legal Services website](#)

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Document information	Description of document information
Document title	Freedom of Information and Environmental Information Regulations Complaints Procedure
Department owner	Governance & Legal Services
Document category	Governance - Documents relating to the governance of the University
Document owner	University Solicitor
Document manager	Head of Data Protection
Related University policies	Data Protection Policy
Related University procedures	
Approved by	Senior Management Team
Date approved	October 2025
Date of commencement	October 2025
Review date	October 2027
Version	V2
History of revisions of the document	V1 – procedure created V2 – section 2 updated.
Web address	Data Protection - Canterbury Christ Church University