



University of
Salford
MANCHESTER

Data Protection Complaints Procedure

Version Number 1.0

Effective from June 2026

Owner: Information Governance

Author: Data Protection Officer

1.0 Purpose

The purpose of this procedure is to:

- Provide an overview of the complaints process for data protection related complaints and concerns
- Confirm what qualifies as a data protection complaint
- Confirm the timescales for managing data protection complaints

2.0 Scope

This procedure applies to all complaints and concerns received by the University in relation to the handling of personal data. This encompasses complaints around the following topics:

- The handling of subject access requests, including complaints around provided/redacted content, response timescales etc...
- The University's response to data breach incidents
- The provision of information relating to data processing activities
- The handling of any other request to exercise data subject rights
- Any other complaints relating to the University's performance of its duties under the Data Protection Act 2018, the UK GDPR, the Data (Use and Access) Act 2025 and the Privacy and Electronic Communications Regulations.

3.0 Managing a Complaint

3.1 Classifying complaints

Any data protection complaints received by the University will be handled as per this procedure document. It is expected that most complaints will be received directly by the Information Governance team.

However, all staff in other departments should be aware of this procedure and should direct any suspected data protection complaints to the Information Governance team immediately.

Where a broader complaint is received by QMO, HR, or any other area of the University, these are to be reviewed and any data protection elements to be forwarded for investigation by the Information Governance team.

3.2 Receiving complaints

Complaints can be received in any format – written (via email or post), verbally (via telephone or in person), or via any other electronic means (e.g. social media).

The University has a designated email mailbox – dataprotection@salford.ac.uk – for receiving complaints, and an intake form available on the public-facing website (ADD HYPERLINK)

Complaints received via any other channel should be identified and passed on to the Information Governance team as soon as possible. All staff should be mindful of this and should redirect data protection complaints as soon as possible.

The University prefers to provide responses to complaints electronically and in writing. Complainants submitting requests verbally or via social media channels will be asked to provide an alternative contact point (email address) through which they may receive our response. Without a suitable contact point (i.e. an email address or postal address), the University are unable to progress a complaint.

Where complainants have accessibility concerns with written submissions and/or responses, these will be discussed, and solutions offered on a case-by-case basis. This may involve taking a written record over the phone and confirming this verbally with the complainant.

Anonymous complaints will be reviewed and considered, but a formal response will not be created and sent out.

3.3 Verifying ID

Where appropriate, the University will request that the complainant provide documentation to verify their identity. This may not be required for all cases, and ID will not be requested where this has previously been supplied as part of an initial subject access request.

For complaints received from a third party relating to the data subject rights of another individual, the University will need to see evidence from the third party of the data subject's authorisation to act on their behalf, plus evidence of photographic ID.

Copies of ID will not be retained after the initial verification step.

3.4 Timescales

The University will acknowledge all data protection complaints within 30 days of receipt.

Acknowledgements will be made wherever possible in the same format as the complaint was received.

The University will investigate all complaints without undue delay and will endeavour to complete this within 60 days of the initial acknowledgement.

Where investigations are complex and will require extended deadlines, the University will confirm this in writing to the individual and will provide updates where appropriate.

3.5 Investigating Complaints

Investigation of a data protection complaint will be managed by the Information

Governance team. This may require some or all of the following:

- Review of previously provided subject access request responses
- Review of previous data breach investigations
- Review of any other Information Governance team cases
- Discussion of complaint with other areas of the University, including the request to provide additional documentation and evidence (which may include personal data)
- Discussion with external parties, where applicable (i.e. third-party processors or joint data controllers)

Investigations will be appropriate to the case, and justifiable enquiries will be made as required.

A record of all investigations will be maintained for a period of 6 years after the complaint case is closed.

3.6 Responses

Responses will:

- Be provided in writing, and in the same format as the complaint was received, wherever possible
- Contain a clear explanation of what steps were taken during the investigation
- Contain details of any steps taken to resolve any issues identified, or details of steps that will be taken at a later date
- Include copies of any necessary evidence as required
- Provide contact details for the ICO should the complainant not be satisfied with the response and require further escalation

Once the University has concluded its investigation, there will be no further review process available.

3.7 Reporting and Monitoring

Details of all complaints received by the University will be recorded for the purposes of reporting and performance monitoring. Statistics will be used to assess the performance of the University in responding to complaints, to review and monitor trends, and to inform decision making and process improvement.

Annual reporting of these top-level statistics will be made to ULT.

Significant concerns, trends and non-compliances will be raised within the Data Governance Steering Group as appropriate.

4.0 Responsibilities

- 4.1 Responsibility for this procedure sits with the Information Governance team.
- 4.2 The Data Protection Officer has overall accountability for the data protection complaints process.
- 4.3 The Data Governance Steering Group (and ULT where appropriate) is informed of the outcomes of any data protection complaints.
- 4.4 All other staff are required to be aware of this procedure, and to understand where to direct data protection complaints.

5.0 Related Documentation (please note, not an exhaustive list)

- **Data Protection Policy**

