



The University of Manchester

Standard Operating Procedure

Title:	Data Protection Complaints		
Version:	1.0	Effective Date	June 2026
Summary	Procedure for managing data protection complaints received by the University		

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1. Introduction and purpose

This Procedure sets out how The University of Manchester (the “University”) deals with data protection complaints.

1.1. What is a data protection complaint?

A data protection complaint relates to a concern about how the University has collected, used, stored or shared your personal data. Examples might include when:

- Your personal data has been shared without your permission
- You have received someone else’s personal data in error
- You believe your data has been used in a way you were not told about
- You consider that your request to access your personal data (Subject Access Request) has not been handled appropriately

If you are a student with a concern relating more broadly to your experience as a student (e.g. teaching, support, or services), you should use the [Student Complaints Procedure](#).

1.2. The right to make a complaint

A data subject (in simple terms, the person to whom the data relates) has the right to submit a complaint to the University if they consider that it has not processed their personal data in accordance with the UK GDPR.

2. Scope

This Procedure may be used by students, staff, applicants, members of the public or any person who considers that the University has not processed their personal data in accordance with the UK GDPR.

2.1. Roles and responsibilities

2.1.1. The Data Protection Officer

The Data Protection Officer is responsible for overseeing the University's compliance with data protection legislation.

2.1.2. All colleagues

All colleagues must:

- forward any data protection complaints received to dataprotection@manchester.ac.uk at the earliest opportunity; and
- co-operate with the complaint investigator as required.

3. Procedure

3.1. Submission of a complaint

The complainant should email their concerns in writing to the University Data Protection Officer at dataprotection@manchester.ac.uk within 3 months of the issue that is the subject of the complaint arising or 3 months from the last meaningful contact with the University about that issue.

Complaints submitted beyond this time limit will only be considered if there is a credible and compelling reason for the delay, to be determined at the discretion of the Data Protection Officer, taking into account all relevant circumstances

3.2. Acknowledgement of complaint

The University aims to acknowledge complaints within 5 working days (excluding University closure days).

3.3. Circumstances when the University may refuse to consider a complaint

In some cases, the University may refuse to consider a complaint, for example, if it is considered to be manifestly unfounded, abusive, vexatious or excessive.

In this event, the University will contact the complainant / their representative in a reasonable timeframe and explain to them why their complaint is not being considered and any rights they have regarding further escalation of their concerns.

3.4. Consideration of the complaint

A member of the Information Governance Office ("IGO") will:

- make enquiries into the subject matter of the complaint (as appropriate); and
- consider whether the University's handling of personal data complied with applicable data protection legislation.

We aim to handle all complaints fairly, proportionately and in line with data protection legislation.

3.5. Requests for further information

It may be necessary for the University to request clarification or further information from the complainant. This may include discussing the issue in a meeting.

When the University requests clarification or further information from the complainant, the University's consideration of the complaint will pause until the complainant provides the information requested.

If the complainant does not provide reasonably requested information within the stated time frame, the University may close the complaint.

3.6. Timeframe for consideration of complaint

The University will usually respond to a complaint within one month of the date of receipt.

Should further time be required, the University will inform the complainant and provide a revised timescale.

3.7. Conclusion of the Procedure

Having considered the complaint, the University will notify the complainant of:

- The outcome of the complaint (i.e. whether the complaint has been upheld, partly upheld or not upheld);
- An explanation of the decision;
- Any recommendations and/or resolutions proposed by the University; and
- The complainant's right to raise a complaint with the Information Commissioner's Office if they remain dissatisfied (as explained at section 4).

This communication concludes the University's formal data protection complaints Procedure.

3.8. Anonymous complaints

Anonymous complaints will not be accepted, except at the discretion of the Data Protection Officer when there is a compelling reason to do so.

3.9. Group complaints

When a group complaint is made and there is a need to disclose complainant personal data, these may be dealt with separately.

3.10. Verification of identity

If there is any doubt about the identity of the complainant, the University will require confirmation of identity. A copy of a passport, photo driving licence or similar are acceptable forms of identification.

3.11. Representatives

The University will only accept a complaint from an individual's representative if written consent from the complainant, authorising the representative to act on their behalf in relation to the complaint, is received.

4. Complaint to the ICO

If the complainant remains dissatisfied following the conclusion of the University data protection complaints procedure, they have the right under data protection legislation to escalate their concerns directly to the Information Commissioner, who can be contacted at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Further information is available on [the ICO 'Make a Complaint' web page](#).

The University may need to share information relating to the complainant and its consideration of the complaint with the Information Commissioner to assist their review.

5. Processing of personal data for the purpose of considering a complaint

Personal data processed for the purpose of investigating a complaint will be handled in line with [The University of Manchester's Privacy Notices](#).

6. Monitoring Compliance

Compliance with this Procedure is mandatory and any non-compliance must be reported to the Data Protection Officer, who will determine the action to be taken.

7. Review of Procedure

This Procedure will be reviewed at least every two years or when significant changes are required.

Version amendment history		
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