

# Complaints process checklist

Controllers who process personal data under the UK GDPR must operate a data protection complaints process before issues escalate to the ICO. Use this checklist to guide compliance with the UK regime.

- 1. Governance and ownership**
  - Assign clear ownership for data protection complaints
  - Define escalation routes to privacy, legal and compliance teams
  - Ensure senior management oversight of complaint handling trends
  - Review whether existing complaints policies cover privacy-related complaints adequately
- 2. Complaint intake channels**
  - Identify all possible complaint channels, including: Phone, social media accounts, frontline staff, and physical post and ensure individuals can easily make a complaint
  - Ensure complaints raised through any channel can be recognised as complaints and escalated
  - Avoid requiring individuals to use a prescribed complaint route only
- 3. Staff training**
  - Train frontline staff to recognise data protection complaints
  - Ensure teams understand complaints do not need legal language to qualify
  - Provide guidance on identifying complaints linked to matters such as: Data subject access requests, Data sharing concerns, Retention issues, Marketing preferences, Security incidents
  - Refresh training regularly
  - Provide in depth training to those handling complaints
- 4. Response management**
  - Implement processes to acknowledge complaints within 30 days
  - Monitor investigation and response time frames to ensure that complaints are investigated and responded to without undue delay
  - Ensure complainants receive updates where investigations are ongoing
  - Maintain template responses where appropriate
  - Verify identity and the authority of any third party representatives
  - Consider necessary adaptations when you are dealing with children's data
- 5. Logging and record keeping**
  - Implement a central complaint logging process
  - Maintain evidence of investigations and remediation steps
- 6. Transparency**
  - Update privacy notices to explain complaint rights
  - Clearly explain how individuals can raise concerns
  - Ensure complaint information is accessible and easy to understand
  - Review website and customer communication wording
  - Ensure data subject rights request responses detail the right to complain"
- 7. Operational controls**
  - Test complaint escalation processes regularly
  - Carry out periodic audits of complaint handling effectiveness
  - Monitor recurring themes and root causes
  - Use complaint trends to improve data protection practices
- 8. ICO readiness**
  - Maintain records demonstrating compliance with complaint handling obligations
  - Ensure evidence can be produced quickly if requested by the ICO
  - Review lessons learned from complaints and regulatory interactions