



Information Governance 50

Information complaints

1. Introduction. As of 19th June 2026, the Information Commissioner's Office (ICO) is fundamentally changing how Data Protection complaints are handled. Under the Data (Use & Access) Act 2025 (DUAA), the ICO will no longer be the front line for every data subject's grievance. Instead, organisations are required to have in place a process to carry out an internal review of any data subject complaint they receive.
2. Some Practices may already have this in place with complaints about Data Protection and Freedom of Information requests going through a formal process in the form of an internal review. If you don't, then be aware that the ICO expects that organisations must now be the primary resolvers of data issues.
3. What that requirement involves:
 - 3.1. **Mandatory Acknowledgment**: You are now (as of 19th June 2026) legally required to acknowledge a complaint within 30 days.
 - 3.2. **The "Filter" Effect**: The ICO now has the statutory power to refuse to investigate a complaint if the individual hasn't gone through your internal process first.
 - 3.3. **Facilitation**: You must make it easy for people to complain. If your process is hidden or difficult, the ICO can intervene.
4. Actions to take: This is what all Practices need to do now:
 - 4.1. Put in place a [policy](#) to meet the requirement of the DUAA.
 - 4.2. Update your Privacy Notice to meet the requirement. We suggest the following wording:

If you have any concerns about how your information is managed by the GP practice, please see the process outlined below:

- **Submit your complaint to the GP practice in the first instance.**
- **The practice will acknowledge your complaint within 30 days and will respond as promptly as possible.**
- **If you remain dissatisfied following this review, you have the right to escalate your complaint to the UK supervisory authority.**

Information Commissioner:

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 1231113 or 01625 545745

5. **The Information Commissioner's Office states:** *"The DUAA places new requirements on organisations to have a complaints process specifically for data protection related issues. We would expect that more complaints will be resolved by organisations without the involvement of the ICO."*