



## Data protection

# NEW DATA COMPLAINT HANDLING OBLIGATIONS - WHAT DO YOU NEED TO DO?

## + LEGAL DEVELOPMENTS

Changes to data protection legislation in the UK introduced by the Data (Use and Access Act) 2025 require **all organisations to implement a formal data protection complaints process by 19 June 2026**. If an individual considers that an organisation has infringed data protection legislation in its handling of their personal data (or the personal information of someone they're acting on behalf of) and they must be able to make a complaint directly to that organisation, before it is escalated to the Information Commissioner's Office (ICO).

A clear mechanism must be provided for submitting a complaint, there is a **30-day deadline** to acknowledge receipt of each complaint, and a formal response must be provided "without undue delay".

## + HELPING YOU NAVIGATE DATA PROTECTION COMPLAINTS

We are here to support our clients in implementing compliant internal complaints-handling processes, whether through an electronic complaint form or an alternative route, and assisting with integrating the new complaints handling requirements into any existing complaints processes.

## WE CAN ASSIST YOU WITH:

### + ESTABLISHING A COMPLAINTS PROCESS

We can support you in establishing or updating your complaints processes to be clear and accessible. We can help you develop a standard complaints form designed to streamline this process that complies with the legislative and regulatory requirements.

### + UPDATING POLICIES AND NOTICES

We will work with you to implement, or update, your written complaints-handling policies, setting out the organisation's approach to receiving, handling and resolving complaints and ensuring appropriate integration with existing complaints and data subject rights processes.

### + EMBEDDING GOVERNANCE, TRAINING AND OVERSIGHT

We can help you to develop and roll out a practical training programme to strengthen your current governance framework, so that you can effectively manage the new complaints requirements in line with the updated legal obligations.

### + OPERATING THE COMPLAINTS PROCESS IN PRACTICE

We can assist you in managing the complaints process. We can support you with processes to effectively record and track complaints; devise potential remedies and mitigations to minimise and reduce the impact of complaints; and communicate decisions and remedial actions clearly.

# YOUR DATA PROTECTION TEAM



## KATIE HEWSON

Head of Data Protection

+44 20 7809 2374  
katie.hewson  
@stephensonharwood.com



## JOANNE ELIELI

Partner

+44 20 7809 2594  
joanne.elieli  
@stephensonharwood.com



## ELISE DUFOUR

Partner

+33 188 991 064  
elise.dufour  
@stephensonharwood.com



## SARAH O'BRIEN

Managing Associate

+44 20 7809 2481  
sarah.obrien  
@stephensonharwood.com



## BOBBIE BICKERTON

Managing Associate

+44 20 7809 2140  
bobbie.bickerton  
@stephensonharwood.com



## NIC MCMASTER

Managing Associate

+44 20 7809 2661  
nic.mcmaster  
@stephensonharwood.com



## KATIE-CLAIRE LLOYD

Associate

+44 20 7809 2018  
katie.claire-lloyd  
@stephensonharwood.com



## MONICA MYLORDOU

Associate

+44 20 7809 2242  
monica.mylordou  
@stephensonharwood.com



## JONATHAN HOWIE

Associate

+44 20 7809 2337  
jonathan.howie  
@stephensonharwood.com



## MATTHEW ANGELL

Associate

+44 20 7809 2669  
matthew.angell  
@stephensonharwood.com



## TATIANA GHELFEINSTEIN

Associate

+44 20 7809 2887  
tatiana.ghelfenstein  
@stephensonharwood.com



## DOUG HENDERSON

Associate

+44 20 7809 2871  
doug.henderson  
@stephensonharwood.com

## + A LEADING PRACTICE

Our team is consistently recognised by clients and legal directories for its high-quality work and its practical and pragmatic approach. We advise clients on all aspects of data protection law, including advisory, transactional, contentious, and investigations-related privacy matters.

*'The team's practical, actionable advice makes them unique - they combine deep technical knowledge with business savvy in a way that provides unmatched value to their clients.'*

Legal 500 UK 2026

PICCASO Privacy Awards  
2025 - awarded  
'Law Firm of the Year'.



Lexology Index 2026 - awarded  
'Client Choice award for Data in England'.

Recognised in the Lexology  
100: Data 2026 (Formerly the  
GDR 100).

