DATA HANDLING COMPLAINTS PROCEDURE

Document information		
Version Number	V1.0	
Type	Corporate Policy ☒ Customer Policy ☐ Staffing Policy ☐	Operating Procedure ☐
Scope	Albyn Group ☒	Highland Residential ☐ Albyn Housing Albyn ☐
Sponsor	Executive Director of Group Services	
Owner	Corporate Governance Team	
For website publication (Y/N)	Y	
Distribution	All Staff ☒ Customers ☒ Albyn Board ☐ Highland Residential Board ☐	Finance ☐ Corporate ☐ Office of CEO ☐ Human Resources ☐ Customer & Property Services ☐ Highland Residential ☐

Approval Record			
Version	***Detail***	***Approver***	***Date***
V1.0	New procedure	Leadership Team	August 2026
Date of next planned review		July 2031	

Summary of changes to document				
Date	***Action by***	***Version updated***	***New version number***	***Brief description (e.g. updated job titles, reviewed section on delivery, whole document updated, corrected typos)***

CONTENTS

1. INTRODUCTION
2. HOW TO SUBMIT A DATA HANDLING COMPLAINT
3. ACKNOWLEDGEMENT OF DATA HANDLING COMPLAINTS
4. PROCESSING DATA HANDLINGCOMPLAINTS
5. OUTCOME OF THE DATA HANDLING COMPLAINT
6. EXTERNAL ESCALATION
7. RECORD KEEPING AND REVIEW
8. PUBLICATION AND ACCESSABILITY

1 INTRODUCTION

1.1 Albyn Group ("the Group") is committed to ensuring the secure and safe management of data held by the Group in relation to customers, staff and other individuals.

1.2 As part of this the Group wishes to ensure that if an individual complains to us about how we process their personal data, we have a robust process in place for handling this complaint and addressing any valid concerns.

1.3 This process sets out how individuals (data subjects) can raise complaints about how the Group collects, uses, stores, shares, or otherwise processes their personal data. It ensures compliance with the UK GDPR, the Data Protection Act 2018 and other data protection laws.

1.4 This process applies to all complaints relating to:

- Alleged breaches of UK data protection law.
- Handling of personal information (accuracy, retention, security, lawful basis, etc.).
- Responses to data subject rights requests (e.g. subject access requests).

1.5 In this process a "Complaint" means: any expression of dissatisfaction by a data subject about how their personal data has been handled by the Group.

1.6 If your complaint incudes other service delivery issues or issues which are covered by other legislation (for example a request for review under Freedom of Information) the Group will handle those aspects of your complaint under our relevant policies or legal requirements.

2 HOW TO SUBMIT A DATA HANDLING COMPLAINT

How to submit a data handling complaint

2.1 Individuals can submit a data handling complaint:

- By contacting the office by telephone and speaking with the Corporate Team on 0300 323 0990.
- By post, through writing to Corporate Team, Albyn Group, 98-104 High Street, Invergordon, IV18 0DL).
- By emailing informationrequests@albynhousing.org.uk

What information should your data handling complaint include

2.2 Please include the following information when submitting your data handling complaint:

- Your name and contact details.
- A description of the concern.
- Any relevant dates and supporting evidence.
- What outcome you are seeking.

2.3 We may need to ask you to provide further information in the course of reviewing your data handling complaint.

The use of generative AI to prepare data handling complaints

2.4 AI tools can be helpful, but they can also introduce errors or create overly complex data handling complaints. If you use AI to help draft a data handling complaint, please make sure the final wording has been checked and reflects your actual concerns.

2.5 Before you submit a data handling complaint that has been generated by AI, please check that:

- **It only covers the specific concerns you have about how your data has been handled** - *AI tools sometimes generate broad or excessive wording that goes beyond the concern that you have*.
- **The data handling complaint is clear, concise, and focussed** - *Short, straightforward data handling complaints are easier for us to process and usually lead to quicker, more accurate responses*.
- **There are no factual inaccuracies** - *AI can misrepresent legislation or misstate what organisations do. Please review the text of your request carefully and don't assume AI is right. If it has referred to something you don't understand, check what it is*.
- **That the tone is appropriate** - *AI-generated content can sometimes sound abrupt, or otherwise inappropriate. Please check the tone before sending*.

Verifying your identity

2.6 We may need to verify your identity to progress your data handling complaint. What verification we require will depend on our relationship with you and will be taken on a case-by-case basis and we will be reasonable and proportionate about the verification needed.

Making a complain on another person's behalf

2.7 If you are making a data handling complaint on the data subject's behalf (for example you are their family member or solicitor) we will require to be satisfied of evidence of your authority to act on the data subject's behalf in respect of the data handling complaint. If you do not provide this, we cannot investigate your data handling complaint.

3 ACKNOWLEDGEMENT OF DATA HANDLING COMPLAINTS

3.1 We will acknowledge receipt of a data handling complaint within 5 working days. This acknowledgement will:

- Confirm receipt of the data handling complaint.
- Provide a reference number.
- Outline next steps for dealing with the data handling complaint.

4 PROCESSING DATA HANDLING COMPLAINTS

4.1 Upon receipt of a data handling complaint we will

- Assign an appropriate member of staff to manage the data handling complaint.
- Conduct an initial assessment of the data handling complaint to determine: if it is within scope and if further information is needed to investigate (for example verification of your

identity).

- Take appropriate steps to investigate and respond without undue delay. This includes making enquiries into the matter and reviewing relevant records and processes.

4.2 During the investigation we will keep you informed on the progress of the data handling complaint.

5 OUTCOME OF THE DATA HANDLING COMPLAINT

5.1 Once we have completed an investigation of your data handling complaint, we will provide you with an outcome. This will normally be done in writing.

5.2 The outcome will include:

- A summary of the issues investigated.
- Conclusions reached.
- Any corrective action taken (if applicable).
- Information about further escalation options.

6 EXTERNAL ESCALATION

6.1 If you are unhappy with the outcome of your data handling complaint you may refer your complaint to the Information Commission.

6.2 The Information Commission is an independent body whose role is to uphold data protection law in the UK. The Information Commission contains information on their website about how to make a complaint: www.ico.org.uk/make-a-complaint/data-protection-complaints/

6.3 You may also seek judicial remedy for certain data protection issues.

7 RECORD KEEPING AND REVIEW

7.1 We will review the outcome of data handling complaints to identify any areas where our performance can be improved.

8 PUBLICATION AND ACCESSABILITY

8.1 We will publish this process on our website and in accordance with our obligations under the Freedom of Information (Scotland) Act 2002.

8.2 We will ensure reasonable adjustments are made to support those who may need assistance accessing this process and making a data handling complaint. If you require any such assistance, please contact: informationrequests@albynhousing.org.uk or by telephone: 0300 323 0990.

9 HOW YOUR DATA WILL BE PROCESSED

9.1 Personal data collected for the purpose of processing your data handling complaint will be done so in accordance with the Data Handling Complaints Privacy Notice.