



# RUGBY SCHOOL GROUP DATA PROTECTION COMPLAINTS PROCEDURE

## 1. Purpose

The Rugby School Group is committed to handling personal data lawfully, fairly and transparently. This procedure explains how individuals may raise concerns or complaints about the way in which the Group has processed their personal data.

This procedure applies to complaints relating to data protection matters under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and related legislation.

It applies to all schools and entities within the Rugby School Group.

## 2. Scope

This procedure may be used by any individual whose personal data is processed by the Group, including:

- students;
- parents and guardians;
- staff and volunteers;
- governors; and
- alumni.

Examples of complaints may include:

- concerns about how personal data has been used;
- concerns about the accuracy of personal data;
- concerns regarding the disclosure of personal data;
- alleged failures to comply with a data subject request;
- concerns about data retention;
- alleged breaches of confidentiality; and
- concerns regarding compliance with the Group's privacy notices or data protection policies.

Complaints concerning the Group's processing of personal data or compliance with data protection legislation will be managed under this GDPR Complaints Procedure rather than each School's Complaints Policies (for parents and/or students) or Grievance Procedure (for employees).

## 3. Informal Resolution

Many concerns can be resolved quickly without a formal complaint.

Individuals are encouraged in the first instance to contact:

**Data Protection Officer**

School Pro TLC

Email: [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk)

or



**Data Team**

Email: [infosecurity@rugbyschool.net](mailto:infosecurity@rugbyschool.net)

The Group will seek to resolve concerns promptly and informally wherever possible.

## 4. Formal Complaints

Where a concern cannot be resolved informally, a formal complaint may be submitted in writing.

The complaint should include:

- the complainant's name and contact details;
- details of the concern;
- relevant dates;
- any supporting documentation; and
- the outcome sought.

Complaints should be sent to:

**Data Protection Officer**

[DPO@schoolpro.uk](mailto:DPO@schoolpro.uk)

or

**Data Team**

[infosecurity@rugbyschool.net](mailto:infosecurity@rugbyschool.net)

## 5. Investigation

The Group will:

- acknowledge receipt of the complaint promptly, and generally within five working days;
- investigate the matters raised;
- obtain information from relevant staff where necessary;
- consider whether any remedial action is required; and
- provide a written response.

The investigation may be undertaken by the Data Protection Officer, or an appropriate person appointed by the Chief Operating Officer.

The Group will aim to provide a substantive response within one calendar month. Where the complaint is particularly complex, the Group may require additional time. Responding to complaints raised outside of term time may also take more time. The complainant will be informed if we intend to extend the time required to respond to a complaint.

## 6. Outcome

The written response will explain:

- the findings of the investigation;
- whether the complaint is upheld, partially upheld or not upheld;
- any corrective action that has been taken or will be taken; and
- any further rights available to the complainant.



Corrective action may include:

- rectification of inaccurate data;
- restriction or cessation of processing;
- additional staff training;
- amendments to procedures; or
- other appropriate remedial measures.

## 7. Right to Complain to the ICO

If the complainant remains dissatisfied, they have the right to raise concerns directly with the Information Commissioner's Office (ICO) at any time.

The ICO can be contacted at:

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

Telephone: 0303 123 1113

Website: [ico.org.uk](http://ico.org.uk)

The ICO generally expects individuals to have attempted to resolve concerns with the organisation first, although this is not mandatory.

## 8. Monitoring and Review

The Data Protection Officer will maintain a record of formal data protection complaints and outcomes.

The procedure will be reviewed periodically to ensure compliance with applicable data protection legislation and regulatory guidance.