Letter to ask the Information Commissioner for support and / or make a regulatory complaint

[Your NameAddress]
[Your Address]

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

Online [if applicable use the complaints form and keep a copy
https://ico.org.uk/make-a-complaint/data-protection-complaints/]

[Date]

Dear Information Commissioner's Office,

Subject: Complaint Regarding EdTech Data Processing Practices in [School Name]

I am writing as a concerned parent of a learner at [School Name and address] to formally raise a complaint regarding the processing of my child's personal data through the use of Educational Technology (EdTech) at their school. I am seeking your assistance in addressing several issues that I believe are in violation of data protection law and the principles outlined in the Age Appropriate Design Code (AADC).

I kindly request the ICO's assistance in the following areas:

- Investigate whether the data processing practices of [School Name] and the EdTech provider [Named if known] comply with UK Data Protection law and the AADC;
- Advise the school on its obligations to provide transparent, accessible, and comprehensive information to parents and guardians;
- Ensure the EdTech provider is held accountable for any misuse of learner data, including discriminatory practices, profiling, or failure to comply with data protection law.

Below, I have outlined the concerns I wish to raise. Please note that some issues may not apply to this specific case, and I have marked the relevant ones for this complaint:

Through this complaint I hope to achieve [adapt as necessary]:

- Clear accessible privacy notices suitable for a child aged [insert age range] provided by [School Name] and/ or their EdTech provider(s);
- A transparent explanation of how learner data is collected, processed, stored, and destroyed;
- Provision of an opt-out or objection mechanism for children and guardians;
- Assurance that the EdTech provider and educational setting, and any further processing, comply with all relevant data protection laws and standards.

My areas of concern include [include all that apply and delete the others]:

Lack of Transparent Processing Information
☐ The school has not provided clear information about the personal data collected through EdTech applications, how it is used, or with whom it is shared.

Absence of a Privacy Notice
☐ The school has not made available a privacy notice specific to EdTech platforms, leaving parents unaware of the data collection, retention, and processing practices.

Rights Not Explained
☐ Parents and learners have not been informed of their data protection rights, including the right to access, rectify, or erase personal data or the retention and destruction policy.

No Right to Opt Out or Object
☐ The school has not explained or provided the option to object to or opt out of data processing activities conducted by EdTech platform or any of its related third parties.

No Information on the EdTech Provider's Use of Data
☐ There has been no transparency regarding how the EdTech provider may use learner data for their own purposes, such as analytics, advertising, or profiling.

Potential Harms to Learners
☐ I am concerned that the processing practices of the EdTech provider could lead to:

- Discrimination against certain groups of learners.
- Bias in data or algorithms, affecting educational opportunities.
- Profiling of learners based on sensitive or inferred data.

Non-Compliance with the ICO Age Appropriate Design Code (AADC)
☐ The EdTech tools in use do not appear to align with the ICO AADC's standards for transparency, data minimisation, or the best interests of children.

I appreciate your attention to this matter and look forward to your response. Should you require any additional information to assist with this complaint, please do not hesitate to contact me.

Yours sincerely,
[Your Full Name]
[Your Contact Information]