DPIA template: Independent school (England or Scotland)

Sendix · Based on DPA v1.4, DPIA v0.7 and the controller DPIA sections approved 12 October 2026 · November 2026

Template · your DPO decides

Template, 6 November 2026. Sendix AI Ltd (the processor) has written this to save you time. It is not legal advice: your DPO decides. It follows DPA v1.4. Sendix's own sections of the DPIA (v0.7, approved 6 November 2026 as a provisional processor assessment, with consultation outstanding, and the Scotland addition, approved 12 October 2026) are available on request from privacy@sendix.ai. Fill in every **[bracket]**.

1. Who is the controller, and who signs

Controller	The school's proprietor: the company, charity or individual that owns and runs the school. For a school in a group, check whether the group company or the school's own company is the proprietor.
Who signs this DPIA	The proprietor: a director or trustee, the bursar, or another person the proprietor has authorised in writing. The school's DPO or data protection lead gives advice and records it.
Who signs the DPA with Sendix	The proprietor signs the DPA in the Sendix app, through someone it has authorised.
Controller name and address	**[name, address]**
Controller ICO registration	**[number]**
Controller DPO	**[name and contact]**
Processor	Sendix AI Ltd, SC883770, ICO ZC264381, privacy@sendix.ai

2. What the processing is

- **Purpose.** Staff upload EHCPs (England), or IEPs and Child's Plans (Scotland). Sendix flags wording that is too vague to deliver or review, cites the basis for each flag, and (for EHCPs and IEPs) suggests wording from evidence already in the file. A member of staff accepts, edits or rejects every suggestion. Nothing is decided automatically.
- **Plans in scope: [EHCPs (England), or IEPs and Child's Plans (Scotland)]. Volume:** about **[number]** plans a year. **Users: [number]** staff in SENCO or SEND lead roles. No other staff can see plan text.
- **Data.** Plan text about a pupil's needs, outcomes and provision, which is special category data. Before storage, Sendix removes the pupil's name, UPNs, NHS numbers, postcodes and most written dates, and discards EHCP health and social care sections (C, D, G and H) from plan text. Other names are replaced with roles where possible; this is best-effort, so treat the stored text as personal data.
- **Where.** Microsoft Azure UK South (app, database, backups) and Amazon Bedrock in AWS London (the AI model, which sees extracts only and keeps no inputs or outputs). Pupil data is stored and processed in the UK.

3. Lawful basis

- **Article 6:** public task is generally not available to an independent school. Test the options in this order

with your DPO: 6(1)(f) legitimate interests (planning and reviewing the support you give pupils with SEND or additional support needs, with a legitimate interests assessment: **[reference]**); then 6(1)(b) contract, only if your contract with parents covers this support.

- **Article 9:** for information about a pupil's disability, 9(2)(g) with Data Protection Act 2018, Schedule 1, paragraph 6, in connection with your duties to disabled pupils under the Equality Act 2010. Your Appropriate Policy Document: **[reference]**. Explicit consent, 9(2)(a), only as a fallback for content not covered: from the parent for pupils under 12, and in Scotland from pupils aged 12 or over who are able to understand.
- **Pupils placed by a local authority:** the authority may be the controller for those pupils' plans. Check the placement contract before including them.

Necessity. Sendix supports a review you already carry out. Only the parts of the plan the review needs are kept, identifiers are removed first, and staff decide every change.

4. Consultation and transparency

- **DPO** consulted on **[date]**; advice in section 7.
- **Families** told through your privacy notice, updated on **[date]** using Sendix's insert (available on request). **[Edit if you also consulted a parent forum.]**
- Your contract with parents and your privacy notice should say that you use a processor to review plans.

5. Risks and measures

Risk	Sendix's measures	Your measures	Residual risk
Someone outside your school reads plan text	Per-school access checked in code and tested every build; MFA for SENCO and SEND lead accounts; UK hosting. Sendix's independent penetration test is not yet done (booked for January 2027): until it is complete, Sendix releases real pupil data to no more than 3 organisations, each only with a Cyber Essentials certificate held, cross-school tests passing and your DPO's written acceptance of this risk	Remove leavers promptly; staff keep MFA	**[Low / Medium]**
Re-identification from stored text	Identifiers removed; health and social care sections discarded; best-effort name redaction	Upload the plan only, not assessment packs or chronologies	**[Low / Medium]**
A suggestion is wrong and is relied on	Every flag cites its basis; suggestions use only evidence in the file; staff decide every change	Staff check each finding before acting on it	**[Low]**
Data kept too long	A daily job deletes records when your retention period ends; backups within 35 days	Set your retention period in Sendix: **[days]**	**[Low]**
Breach at Sendix	Notice to you within 24 hours (DPA clause 7.1)	Your breach procedure covers processors	**[Low / Medium]**

5a. Review preparation (England EHCPs, only if you switch it on)

Delete this section if you do not use review preparation. It needs a countersigned DPA v1.4 and your organisation's release.

- **What happens.** Staff add reports, parent and child views and what they know about the child's progress. Staff weigh the evidence against each outcome, record their own status and reason, and download a write-up. Sendix sends nothing to anyone.
- **Data.** Whole reports, encrypted at field level, which can include health, family and social care information. The section discard does not apply: an EHCP uploaded or pasted through this route keeps

its filtered C, D, G and H text. Staff add only what the review needs.

- **The filter.** It removes the child's name, recognised identifier patterns and labelled full dates of birth, and keeps other dates. LA case references and identifiers in unrecognised forms may remain, so staff exclude unnecessary identifiers.
- **AI analysis** is off for real pupil data, and stays off until Sendix's founder records a release decision after an evaluation labelled by a SENCO. Before it is used, you assess meaningful human involvement under UK GDPR Articles 22A–22D. Staff must actively select a quote the model found before it reaches the write-up, a requirement in force before release.
- **Reports written by others.** Holding a third-party report does not itself authorise AI processing. Confirm you may use each report for this purpose: **[reference]**.
- **Children and young people.** Give accessible information, and plan for requests they make themselves and for third-party information in anything you disclose: **[reference]**.
- **Retention.** Where retention enforcement is on, evidence passages are deleted 30 days after a review is finalised or cancelled, or 180 days after the latest activity on an open review. An active legal hold pauses this. Saved quotes stay with the plan.
- **Pupil display names** are optional, off by default and switched on per school by you, in effect once built. The AI model never receives the name. **[On / off for each school]**

Risk	Sendix's measures	Your measures	Residual risk
Reports hold more than the review needs	Filter; field encryption; bounded retention; staff can delete a passage	Staff add only what the review needs	**[Low / Medium]**
Staff knowledge holds third-party data	Filter on every entry; other names removed best-effort	Staff briefing; use roles, not names	**[Low / Medium]**
A report about another child is added	A labelled name must match the name staff typed; staff read parent and child views	Check the child before each upload	**[Low / Medium]**

6. Your own measures

Measure	Owner	Done
Privacy notice updated	**[role]**	**[date]**
Appropriate Policy Document updated	**[role]**	**[date]**
Retention period set in Sendix	**[role]**	**[date]**
Staff briefed (upload the plan only; use roles, not names, in notes)	SEND lead	**[date]**
Review after the first term	SEND lead and DPO	**[date]**

7. Sign-off

	Name and role	Date
Measures approved, for the controller	**[see section 1: who signs]**	
Residual risks accepted	**[as above]**	
DPO advice (and whether it was followed)	**[DPO]**	
Next review	After the first term, then yearly, and when Sendix notifies a change	

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