DPIA template: Scottish council (education authority)

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 council, as education authority, for the plans of pupils in its schools. Schools do not sign separately. For a Child's Plan, the council controls its own copy; the lead agency stays controller of the master plan.
Who signs this DPIA	The council: the Chief Education Officer or another officer with delegated authority under the council's scheme of delegation. The council's DPO gives advice and records it. A school's head or principal teacher does not sign for the council.
Who signs the DPA with Sendix	The council signs the DPA in the Sendix app for all of its schools using Sendix. Where the council's own contract terms conflict with the DPA on data protection, the more protective term applies (DPA v1.4).
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 IEPs and Child's Plans. Sendix flags wording that is too vague to deliver or review, cites the basis for each flag, and (for IEPs) suggests wording built from the plan. A member of staff accepts, edits or rejects every suggestion. Nothing is decided automatically.
- **Plans in scope: [IEPs and Child's Plans]. Volume:** about **[number]** plans a year. **Users: [number]** support for learning staff, such as principal teachers (ASN) and heads of learning support. No other staff can see plan text.
- **Data.** Plan text about a pupil's needs, targets and support, which is special category data. Before storage, Sendix removes the pupil's name, NHS or CHI numbers, Scottish Candidate Numbers, UPNs, postcodes and labelled full dates of birth. For a Child's Plan it keeps only the labelled fields and removes other dates, except the plan's review date. 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:** 6(1)(e) public task, to carry out the council's duties under the Education (Additional Support for Learning) (Scotland) Act 2004.
- **Article 9:** 9(2)(g) substantial public interest, with Data Protection Act 2018, Schedule 1, paragraph 6. Your Appropriate Policy Document covers this processing: **[reference]**.
- **Child's Plans:** check that the terms on which other agencies shared the plan allow this use (DPA v1.4, clause 2.5). The statutory Child's Plan provisions in Part 5 of the Children and Young People (Scotland) Act 2014 were repealed from 5 May 2025, so the plan is a non-statutory GIRFEC practice document.

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.]**
- The council is a Scottish public authority, so FOISA and the Public Records (Scotland) Act 2011 apply. DPA v1.4 clause 13 covers both. Councils usually also complete a children's rights and wellbeing impact assessment; this template does not replace it.

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 support for learning 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; only the labelled fields of a Child's Plan kept; 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]**

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)	Support for learning lead	**[date]**

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Review after the first term	Support for learning 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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