Sub-processors

Sendix · Matches Schedule 3 of DPA v1.4 · based on DPIA v0.7 · November 2026

These are the only suppliers that process your pupils' data for Sendix. We give at least 30 days' written notice before adding or replacing one, and you can object (DPA clause 5.2).

Sub-processor	What it does	Where the data is processed
Microsoft Ireland Operations Ltd (Microsoft Azure)	Hosting, database, backups, key management, logging	United Kingdom (UK South)
Amazon Web Services EMEA SARL (Amazon Bedrock)	Runs the AI model on extracts of plan text and, only where AI analysis in review preparation is switched on, on eligible passages of filtered review evidence. That analysis is off for real pupil data	United Kingdom (London, eu-west-2)
Amazon Web Services EMEA SARL (Amazon SES)	Transactional email to staff, such as invitations and password resets. No pupil data	United Kingdom (London, eu-west-2)

The AI model

- **Model:** Qwen3-235B-A22B-2507, an open-weight model, Bedrock model ID `qwen.qwen3-235b-a22b-2507-v1:0`.
- **Where it runs:** Amazon Bedrock in AWS London (eu-west-2), using **In-Region** on-demand inference.
- **No cross-region profile.** Sendix calls the model by its direct model ID at the London endpoint (`bedrock-runtime.eu-west-2.amazonaws.com`). Cross-region inference profiles (IDs beginning `eu.`, `global.`, `us.` or `apac.`) could route a request outside the UK. Our model policy refuses them in code, so they cannot be approved.
- **Fail-closed approval.** A model request is sent only if a current, signed approval record matches the exact endpoint, region and model ID. Production has one approval record: this model, in eu-west-2, in-region on-demand. A request to anything else is blocked, and the analysis reports as incomplete.
- **Retention and training.** Bedrock does not store prompts or outputs for this model, and does not use them to train models. Sendix does not use your data to train or fine-tune any model.
- **What it sees.** On plan review, extracts of minimised plan text, not whole plans. The pupil's name, UPNs, NHS numbers, postcodes and most written dates are removed from the plan text first. Where AI analysis in review preparation is switched on, it sees eligible passages of filtered review evidence; that analysis is off for real pupil data. Identifier records your school stores with a plan (the LA case reference and, optionally, the UPN, with delivery routes) are never supplied to the model, but an LA reference written in plan text or a report is not generally removed. A pupil display name, where a school switches that on once built, is never sent to the model.

How we checked this on 15 October 2026: the production configuration sets the model provider to Bedrock and the model ID above, and the approval record names the London endpoint, region `eu-west-2` and SKU `in-region-on-demand`.

Other suppliers that never receive pupil data

Supplier	What it does
Microsoft Azure Static Web Apps (West Europe)	Hosts the public website sendix.ai. It never handles pupil data

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Microsoft 365	Sendix staff email
GitHub	Source code, build and deployment pipeline. It does not receive application data or database credentials
Cloudflare	DNS for sendix.ai

Review status: approved by Sendix (Data Protection Lead), 6 November 2026, after AI-assisted legal and data protection review; independent solicitor and DPO review scheduled as Sendix scales.

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