

# DPIA template: Independent school (England or Scotland)

**Template, 15 October 2026.** Sendix AI Ltd (the processor) has written this to save you time. It is not legal advice: your DPO decides. Sendix's own sections of the DPIA (v0.3, approved 9 October 2026, and the Scotland addition, approved 12 October 2026) are available on request from [privacy@sendix.ai](mailto: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   | <b>[name, address]</b>                                                                                                                                                                             |
| Controller ICO registration   | <b>[number]</b>                                                                                                                                                                                    |
| Controller DPO                | <b>[name and contact]</b>                                                                                                                                                                          |
| Processor                     | Sendix AI Ltd, SC883770, ICO ZC264381, <a href="mailto:privacy@sendix.ai">privacy@sendix.ai</a>                                                                                                    |

## 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 dates, and discards EHCP health and social care sections (C, D, G and H). 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; independent penetration test completed before the first school's real data | Remove leavers promptly; staff keep MFA                    | <b>[Low / Medium]</b> |
| 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 | <b>[Low / Medium]</b> |
| 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               | <b>[Low]</b>          |
| Data kept too long                          | A daily job deletes records when your retention period ends; backups within 35 days                                                                                                    | Set your retention period in Sendix: <b>[days]</b>         | <b>[Low]</b>          |
| Breach at Sendix                            | Notice to you within 24 hours (DPA clause 7.1)                                                                                                                                         | Your breach procedure covers processors                    | <b>[Low / Medium]</b> |

## 6. Your own measures

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

## 7. Sign-off

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