

DPIA template for schools using Atlas Study

Approved by Sahil Ahmad for EDS Education Ltd on 28 October 2026.

The school is the controller and owns its DPIA. This template follows the ICO's DPIA steps and is pre-filled with Atlas's answers; the school checks each answer, fills the parts marked *School to complete*, and signs it off. Questions about Atlas: support@edseducation.com.

Step 1: Why a DPIA

Atlas processes children's personal data at scale (homework, answers, marks and feedback) and uses automated marking help and AI providers. The ICO lists processing of children's data and innovative technology as reasons to carry out a DPIA, so we recommend one.

Step 2: The processing

Question	Answer
What is Atlas?	An online homework, assessment and practice service for UK schools (KS3 and GCSE), run by EDS Education Ltd (company 11334874)
What data?	Names, school emails, classes, homework, answers, marks, feedback; parents' contact details when the school links them. Full list: DPA Schedule 1
Whose data?	Pupils, staff, and parents the school links
Special category data?	Not needed. Atlas does not ask for or use health, SEND, ethnicity or religion data
Where does it come from?	Staff add or import pupils (or import a Google Classroom class list); pupils create answers; teachers create marks and feedback
Who can see it?	The pupil, their teachers and school leaders; parents only for children the school links; Atlas support only when you ask, read-only and logged
Where is it?	Ireland (EU) for the database and files; server functions in Dublin; see the suppliers below
How long?	Homework, marks and feedback are kept while the school uses Atlas, and the school can ask us to delete them. Shorter periods: DPA Schedule 4
Automated decisions?	Atlas suggests marks for some answers. Teachers can check and change every mark, and the school decides when pupils see marks. No decision with legal or similarly significant effect is made only by a machine
Suppliers	Supabase, Vercel, Resend, OpenAI, Anthropic, Google (if used), Stripe (families only), GitHub (code only). Regions and safeguards: DPA Schedule 2
<i>School to complete</i>	Number of pupils and staff; year groups; which features the school turns on (Google sign-in, Classroom import, parent links, Focus mode, live work)

Step 3: Consultation

School to complete: who was consulted (DPO, senior leaders, IT, staff; pupils and parents where appropriate). Atlas will answer questions and join a meeting on request.

Step 4: Necessity and proportionality

Question	Answer
Lawful basis	Public task (Article 6(1)(e)) for state schools; legitimate interests for independent schools. Your school confirms its own basis
Why is each kind of data needed?	Names and classes to give each pupil the right work; answers to mark them; marks and feedback to teach; parent details only for parents the school chooses to link
Less intrusive options considered	Pupils sign in with school accounts (no personal email or date of birth asked); parents see only children the school links; Focus mode records only when a pupil leaves a page and for how long, never the screen or keys
Data minimisation	No advertising, no selling, no profiling for marketing; free-text fields should not hold special category data
Accuracy	Teachers can correct marks and details at any time
Rights	Exports, corrections and deletions through Atlas or support@edseducation.com (DPA clause 11)
Transfers	Some suppliers outside the UK under the UK-US data bridge or Standard Contractual Clauses with the UK Addendum (DPA clause 8)
Children's Code	Atlas is designed to the ICO Age Appropriate Design Code: high privacy by default, no selling or advertising, no nudges to share more

Step 5 and 6: Risks and how Atlas reduces them

Likelihood and severity: Remote / Possible / Probable; Minimal / Significant / Severe. Residual risk after the measures. *School to review and add its own risks.*

#	Risk to pupils, parents or staff	Likelihood	Severity	How Atlas reduces it	Residual risk
1	Someone outside the school sees pupils' work or marks	Possible	Significant	Row-level security on every table; role checks on every action; private file storage with links that last an hour at most; audit log of admin actions	Low
2	A teacher or parent sees a pupil they should not	Possible	Significant	Teachers see only work they set and their own classes; parents see only children the school links; exact-email checks on parent links	Low
3	A staff account is taken over	Possible	Significant	Two-step sign-in available for staff (recommended for everyone who manages the school's account); the school removes leavers; sessions expire	Medium (low once two-step sign-in is on)
4	A personal data breach at Atlas or a supplier	Remote	Severe	Encryption in transit and at rest; sensitive children's information encrypted again (AES-256-GCM); key rotation; Atlas tells the school within 24 hours (DPA clause 10)	Low

#	Risk to pupils, parents or staff	Likelihood	Severity	How Atlas reduces it	Residual risk
5	Pupils' work is sent to AI providers outside the UK	Probable (by design)	Significant	Only what is needed for marking help or Ask Atlas is sent; providers may not train on it; Standard Contractual Clauses and the UK Addendum; provider retention 30 days or less except flagged abuse	Low
6	An automated mark is wrong and affects a pupil	Possible	Minimal	Teachers can change every mark; the school chooses when pupils see marks; unreadable or unsafe answers go to the teacher	Low
7	Data kept longer than needed	Possible	Significant	Shorter periods for particular records (DPA Schedule 4) deleted by nightly jobs; school data kept only while the school uses Atlas and deleted on the school's request	Low
8	Malicious file uploaded	Remote	Significant	Type, size and real-content checks; active PDFs refused; private storage. Atlas does not run a dedicated malware scanner	Low
9	Loss of data (outage or error)	Remote	Significant	Daily backups kept 7 days; full restore rehearsed on 28 Aug 2026 (under 3 minutes)	Low
10	Pupils feel watched (Focus mode, live work)	Possible	Minimal	Pupils are told on the page; only time away from the page is recorded; only the teacher who set the work sees it; records deleted after the school year	Low
11	Wrong parent linked to a pupil	Remote	Significant	The school decides every link; exact-email and same-school checks; parent invites expire	Low
12	Special category data typed into free text	Possible	Significant	Atlas does not ask for it; school guidance to staff; the school can ask Atlas to delete it	Medium (school action)

Step 7: Sign off

Item	Name / date	Notes
Measures approved by		
Residual risks approved by		If any high residual risk remains, consult the ICO before processing
DPO advice		
DPO advice accepted or overruled by		
Review date		Recommended: every year, and when the school turns on a new Atlas feature

Sources: the Atlas Study data processing agreement for schools, and the suppliers' own published terms and regions (checked 28 October 2026).