

Funds4School

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DOCUMENT 2 OF 4 · SCHOOL FACING ASSESSMENT

Data Protection Impact Assessment

A pre-completed DPIA covering the processing of pupil personal data by Funds4School, prepared for schools to review, adapt and adopt.

PREPARED BY	Bang On Print & Design Ltd, trading as Funds4School Company number 08123506 Unit 6 Mandale Park, Lemington Road, Lemington, Newcastle upon Tyne, NE15 8BU privacy@funds4school.co.uk · 0191 466 1125
ICO REGISTRATION	ZC254991
STRUCTURE	Follows the Information Commissioner's seven step DPIA template
FOR USE BY	School / academy trust name
VERSION	2.0
ASSESSMENT DATE	22 September 2026
REVIEW DUE	22 September 2027, or sooner if the processing changes

HOW TO USE THIS DOCUMENT

Funds4School has completed the sections describing its own processing, risks and controls. The School remains the Controller and therefore owns the DPIA. The School should review every section, complete the shaded fields covering its own decisions and consultation, and sign off at Step 7. An editable Word version of this assessment is available on request.

Step 1 · Identify the need for a DPIA

What is the project?

The School is running a fundraising project in which pupils' names and class details are used to produce personalised items, which are then sold to raise funds for the School. Funds4School receives a list of pupils from the School, uses it to personalise the products, manufactures and arranges delivery, and then deletes the list.

Why is a DPIA required?

Article 35 of the UK GDPR requires a DPIA where processing is likely to result in a high risk to individuals. The Information Commissioner's guidance lists the use of children's personal data, and the use of the personal data of vulnerable data subjects, as factors indicating high risk. This processing involves children's personal data, so a DPIA is appropriate even though the data set is small and the processing is straightforward.

Screening summary

ICO HIGH RISK INDICATOR	PRESENT?
Personal data of children or other vulnerable data subjects	Yes
Large scale processing	No. Typically 200 to 600 records per project.
Special category or criminal offence data	No
Systematic monitoring, tracking or profiling	No
Automated decision making with legal or significant effect	No
Data matching or combining datasets	No. Each school project is kept separate.
Innovative technology, including AI	No. Pupil data is not used in any AI or machine learning system.
Denial of a service or preventing exercise of a right	No
Transfer outside the UK to a country without adequacy	No

Step 2 · Describe the processing

Nature of the processing

How data is collected

The School exports a pupil list from its management information system and uploads it to the Funds4School portal over an encrypted connection, or supplies it by another agreed secure method. Personal data is not accepted by unencrypted email.

How data is used

The list is converted into a production file. Each pupil's name and class are placed onto the relevant personalised item, which is then printed and finished in house.

How data is stored	In an encrypted database within a firewalled hosting environment provided by Krystal Hosting Ltd in the United Kingdom, in a project record separated from every other school. Access is restricted by role to named accounts protected by multi factor authentication.
Who has access	Named Funds4School production and account personnel only. Printing, personalisation and finishing are carried out by Bang On Print & Design Ltd, the company behind the Funds4School trading name, at its own premises. No separate manufacturing company is involved. Delivery partners receive address labels only.
How data is deleted	Securely deleted from live systems on project completion and in any event within 30 days of it. Encrypted backups are overwritten within a further 35 days. Paper is destroyed by Premier Shredding, Newcastle, a certified confidential shredding contractor.
Sub-processors	As listed in Schedule 3 of the Data Processing Agreement. Schools receive 30 days' notice of any change and may object.

Scope of the processing

Data collected	Pupil first name; surname or surname initial; class or form name; year group; school name. Nothing else.
Data expressly excluded	Date of birth, home address, contact details, photographs, unique pupil number, pupil premium or free school meal status, special educational needs data, medical data, ethnicity, religion, safeguarding information, and all other special category data.
Volume	Approximately number pupil records for this project.
Frequency	One upload per project, typically once per academic year.
Retention	Duration of the project plus a maximum of 30 days, with encrypted backups overwritten within a further 35 days.
Geography	United Kingdom. Hosting is provided by Krystal Hosting Ltd in the United Kingdom. Production takes place at Unit 6 Mandale Park, Newcastle upon Tyne.
Individuals affected	Pupils at the School, ordinarily aged 3 to 18.

Context of the processing

Children are less able to understand and consent to the use of their data and are entitled to specific protection under Recital 38 of the UK GDPR. Pupils are not the customers here. They are unlikely to be aware of the processing unless the School tells them, and they have no practical control over whether their name appears on a school list. That imbalance is the central factor in this assessment and it is why the mitigations focus on minimisation, short retention and preventing any secondary use.

The processing itself is not novel or intrusive. It is the digital equivalent of a printed class list, which schools have produced for decades. There is no monitoring, no profiling, no enrichment from other sources and no commercial exploitation of the data. The relationship is a standard controller to processor arrangement governed by a written Article 28 agreement.

Purposes of the processing

What the School achieves	Funds are raised for the School through the sale of personalised items, without School staff having to handle production, payment collection or fulfilment.
What Funds4School achieves	Delivery of its contracted service and payment under the commercial agreement.
Wider benefits	Pupils and families receive a keepsake item. Proceeds fund School activities that benefit pupils.

Step 3 · Consultation process

This section is for the School to complete. Funds4School cannot consult on the School's behalf.

Parents and carers consulted?

Record how parents and carers were informed, for example a letter home, a newsletter item or a note in the school privacy notice, and any feedback received.

Pupils consulted?

Record whether pupils were told, in age appropriate terms, that their name would appear on the item, and any views expressed.

Staff consulted?

Record which staff were involved, for example the data protection lead, business manager, headteacher.

Data protection officer advice

Record the DPO's advice and whether it was followed.

Processor consulted?

Yes. Funds4School provided this assessment, its Data Processing Agreement, its security schedule and its sub-processor list.

Information Commissioner consulted?

No. Residual risk is assessed as low, so prior consultation under Article 36 is not required.

Step 4 · Assess necessity and proportionality

Lawful basis

For the School as Controller, this is ordinarily Article 6(1)(e), public task, where the fundraising supports the School's function, or Article 6(1)(f), legitimate interests, for academies and independent schools. **School to confirm which basis it relies on and record it in its record of processing activities.** Consent is not usually the right basis because pupils cannot meaningfully refuse a whole class activity.

Does the processing achieve the purpose?	Yes. A personalised item cannot be produced without the pupil's name, and cannot be sorted and delivered to the right class without the class name.
Is there a less intrusive way?	Reviewed. The only lower intrusion option is a non-personalised product, which does not deliver the intended outcome. Where the product design allows, the School can supply first names only, without surnames, and this is the recommended default.
Data minimisation	The data set is limited to name and class. Funds4School will reject and delete any additional fields supplied in error and will notify the School.
Data quality	The School supplies data directly from its management information system, which is the authoritative source. Proofs are returned to the School for checking before production.
Transparency	The School informs pupils, parents and carers through its own privacy notice. Funds4School publishes a privacy notice covering its role and its retention periods.
Individual rights	Requests are handled by the School. Funds4School will not respond to a data subject directly, will notify the School within 3 working days, and will assist at no cost within the limits set in the Data Processing Agreement.
Processor compliance	Governed by a written Article 28 agreement, with a security schedule, a named sub-processor list, a 30 day change notice period, a 24 hour breach notification duty and audit rights.
International transfers	None. Pupil data is processed and stored in the United Kingdom only. The payment provider, which processes within the United Kingdom and the EEA, receives no pupil data. Any future transfer outside the United Kingdom would require the School's consent and an approved transfer mechanism.

Step 5 · Identify and assess risks

Likelihood and severity assessed before mitigation. Overall risk is the combination of the two.

#	SOURCE OF RISK TO INDIVIDUALS	LIKELIHOOD	SEVERITY	OVERALL
1	Pupil list is intercepted or exposed in transit from the School to Funds4School, for example by being emailed unencrypted	Possible	Significant	Medium
2	Unauthorised access to the hosting environment exposes pupil names and classes	Remote	Significant	Low
3	Pupil data is retained longer than needed, extending the window of exposure	Possible	Minimal	Low
4	Data is used for a purpose the School did not authorise, for example marketing to families or reuse across schools	Remote	Significant	Low
5	A sub-processor mishandles a delivery label or a paper record in transit to destruction	Possible	Significant	Medium
6	The School supplies more data than requested, including special category data such as SEN or free school meal flags in a hidden spreadsheet column	Possible	Severe	High
7	A pupil is named on an item where the School holds a safeguarding reason for that child's name not to be published or shared	Possible	Severe	High
8	Pupils, parents and carers are unaware the processing is happening, undermining transparency	Possible	Minimal	Low
9	Paper order forms or proofs containing names are lost or disposed of insecurely	Remote	Significant	Low
10	Loss of the data through system failure, disrupting the project and requiring re-collection	Remote	Minimal	Low

Step 6 · Identify measures to reduce risk

#	MEASURE	EFFECT	RESIDUAL RISK	OWNER
1	Secure portal upload over TLS is the only accepted transfer route. Unencrypted email is refused. Schools are given written upload instructions before the project starts.	Reduced	Low	Funds4School
2	Encryption at rest and in transit, multi factor authentication, role based access, named accounts, patching within 14 days, UK hosting with Krystal Hosting Ltd, controls aligned to the Cyber Essentials scheme, per school data segregation.	Reduced	Low	Funds4School
3	Contractual deletion within 30 days of project completion, backups overwritten within a further 35 days, deletion confirmed to the School in writing.	Eliminated	Low	Funds4School
4	Express contractual prohibition on secondary use, marketing to pupils or families, cross school aggregation, AI training and onward sale. Backed by audit rights.	Reduced	Low	Funds4School
5	Printing and personalisation are carried out in house, so production files are not disclosed to any third party. Written contracts with every remaining sub-processor on terms no less protective than the school agreement. Named sub-processor list with 30 days' notice of change and a right to object. Full liability retained by Funds4School.	Reduced	Low	Funds4School
6	Automated field validation on upload rejects columns outside the permitted set. Any excess data is deleted and the School notified. The upload screen states the exact fields required.	Reduced	Low	Funds4School
7	The School must screen the list before upload and remove any pupil for whom there is a safeguarding, care order or non-disclosure reason. Funds4School has no visibility of these circumstances and cannot screen for them. This instruction is stated on the upload screen and in the onboarding pack.	Reduced	Medium	School
8	The School adds the activity to its own privacy notice and informs parents and carers before the list is uploaded. Funds4School supplies suggested wording.	Reduced	Low	School
9	Paper kept in locked storage, never left unattended, destroyed by Premier Shredding, Newcastle, with certificates retained.	Reduced	Low	Funds4School

10	Encrypted backups taken daily with restore testing at least annually, plus a documented business continuity plan.	Reduced	Low	Funds4School
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Step 7 · Sign off and record outcomes

Measures approved by	name, role Integrate the measures at Step 6 into the project plan.
Residual risks approved by	name, role If any high residual risk remains, the Information Commissioner must be consulted before processing begins.
DPO advice provided	DPO to summarise their advice and note whether it has been accepted.
DPO advice accepted or overruled by	name, role . If overruled, record the reasons: reasons
Consultation responses reviewed by	name, role
Overall conclusion	With the measures at Step 6 applied, residual risk to pupils is assessed as low, save for risk 7 which is medium and is owned by the School. Prior consultation with the Information Commissioner under Article 36 is not required. The processing may proceed.
This DPIA will be kept under review by	For Funds4School: Simon Davidson, Director. Review due 22 September 2027 or on any material change to the processing, the products or the sub-processor list.

SIGNED FOR THE SCHOOL

Signature

Name and role

Date

ACKNOWLEDGED BY FUNDS4SCHOOL

Signature

Name and role

Date