

## 1. Introduction

School Synergy Limited (“Attend”, “we”, “our”, “us”) provides software services to schools and educational institutions to support attendance monitoring, safeguarding, and communication.

This Privacy Policy explains how personal data is processed when using the Attend platform.

Attend acts **solely as a Data Processor**. The school is the **Data Controller** and determines how and why personal data is used.

If you have questions about how your personal data is used, you should contact your school directly.

## 2. Data Controller and Data Processor

Under UK GDPR:

- The School is the Data Controller
- Attend is the Data Processor

Attend processes personal data only on documented instructions from the school and does not use data for its own purposes.

## 3. Categories of Personal Data

Attend processes personal data provided by the school, which may include:

- **Student data** (e.g. name, date of birth, attendance, identifiers, safeguarding indicators)
- **Parent/carer data** (e.g. contact details)
- **Staff data** (e.g. names, email addresses, roles)
- **Operational data** generated within the system, including:
  - Communications (emails, SMS, message logs)
  - Intervention records
  - User access logs
  - Audit and security logs (e.g. IP address, login activity)

Attend does not collect personal data directly from individuals; all data is provided and controlled by the school.

## 4. Purpose of Processing

Personal data is processed only to provide the Attend service, including:

- Monitoring and improving school attendance
- Supporting safeguarding interventions
- Facilitating communication with parents/carers and staff
- Providing reporting and analytics to schools
- Maintaining system performance, reliability, and security

Attend does not use personal data for marketing, advertising, or any unrelated purposes.

## 5. Lawful Basis

Attend relies on the lawful basis determined by the school as Data Controller.

Typical lawful bases used by schools include:

- Public task (education and safeguarding)
- Legal obligation
- Performance of a contract
- Consent (where applicable for optional services)

## 6. Data Sharing and Sub-processors

Attend may use a limited number of approved sub-processors to support service delivery (e.g. hosting, email, SMS, security services).

All sub-processors:

- Are contractually bound to UK GDPR standards
- Process only the minimum data required
- Are subject to appropriate safeguards

A current list of sub-processors is maintained in the **Attend Sub-processor Register**.

## 7. International Data Transfers

Core data is stored and processed within UK-based infrastructure.

Where limited international transfers occur (e.g. email or SMS delivery), these are:

- Restricted to minimal, function-specific data
- Not used for bulk data processing
- Protected by appropriate safeguards, including:
  - UK International Data Transfer Agreement (IDTA)
  - Standard Contractual Clauses (SCCs)

## 8. Data Security

Attend implements appropriate technical and organisational measures to protect personal data, including:

- Encryption at rest and in transit
- Role-based access control and least privilege
- Multi-factor authentication (MFA) and Single Sign-On (SSO)
- Continuous monitoring and audit logging
- Secure UK-based hosting infrastructure
- Backup and disaster recovery systems

Our security approach is aligned to **ISO/IEC 27001 principles**, and we are working towards formal certification.

## 9. Data Retention and Deletion

Data retention is controlled by the school (Data Controller).

Within Attend:

- Data is synchronised with the school MIS and removed when no longer present
- If a school deletes core data (e.g. student or parent records), all related records are removed from Attend

- Communications, logs, and operational data are retained only as necessary for service delivery and security
- Audit and security logs are retained for up to **12 months**
- Backup data is retained within rolling backup cycles (up to 12 weeks) before secure deletion

At contract termination:

- All data is removed from production systems
- Residual data is securely deleted following backup cycle completion

## 10. Data Subject Rights

Data subject rights under UK GDPR include:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability

As Attend is a Data Processor, requests should be directed to the school (Data Controller). Attend will support the school in fulfilling these requests where required.

## 11. Data Breaches

Attend has procedures in place to detect, report, and respond to personal data breaches.

In the event of a breach:

- The school will be notified without undue delay
- Attend will support investigation and mitigation
- Attend will assist the school in meeting its UK GDPR obligations


## 12. Data Subject Rights

For queries relating to data protection:

School Synergy Limited (Attend)  
Preston Technology Centre  
Marsh Lane  
Preston  
PR1 8UQ

Email: Use our website contact form

Approved by A Cree, Director of Attend (trading as School Synergy limited).

Signature: 

### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	A Cree	20.02.2024
2	Updated	A Cree	27.04.2024
3	Updated & Reviewed	A Cree	01/04/2026