

Data Protection Impact Assessment (DPIA)

Template for schools deploying the Hearo Phonics assessment platform.

Hearo template version 1.1 · Last updated: 10 August 2026. Schools should record their own completion date and review date at Step 7.

The school is the data controller and completes and owns this DPIA. Sections describing Hearo's processing are pre-populated for you; fields marked in the highlighted style are for the school to complete. Under Article 35 UK GDPR a DPIA is required where processing is likely to result in a high risk to individuals — which the ICO treats as likely when processing children's data on any meaningful scale.

Step 1 — Identify the need for a DPIA

The platform records and tracks pupils' phonics progress and involves children's personal data and voice recordings. This falls within the ICO's expectation that a DPIA be carried out. Confirm the trigger and summarise the project below.

Project / processing	Deployment of the Hearo Phonics assessment platform to record and track pupil phonics progress.
Why a DPIA is needed	Processing of children's personal data, including SEND data and (at point of capture) voice recordings.
Date of assessment	<i>[School to complete]</i>
Completed by	<i>[Name, role — e.g. DPO / SENCO]</i>

Step 2 — Describe the processing

Nature — how data is collected, used, stored and deleted, and who has access:

- Teachers and SENCOs enter pupil details and record phonics assessments; the platform captures short voice recordings at assessment.
- How voice recordings are linked to a pupil is a design decision under review. Whichever approach is taken, recordings are used only to assess pronunciation, not to identify a child by voice (see the note under Step 4).
- Educational needs and support (SEND) data is accessible only to teachers and SENCOs, not to Hearo Phonics staff.
- Data is stored on AWS UK/EEA infrastructure. Hearo Phonics Ltd acts as processor on the school's documented instructions.

Scope — what data, how much, how often, retention and geography:

- Data types: pupil name, school/class information, phonics assessment results, educational needs and support data, and voice recordings.
- Data subjects: pupils at the school (children). *[School to insert approximate numbers.]*
- Retention: 3 years from when a child leaves the school; a 90-day deletion window applies following subscription expiry. Anonymised, aggregated data may be retained for research and product improvement; only genuinely anonymised recordings may be retained indefinitely — any recording still linked to a pupil follows the retention schedule above.
- Geography: data held within the UK/EEA; no transfers outside the UK/EEA.

Context — the relationship with individuals and the nature of the data:

- The data concerns children, who merit specific protection under the UK GDPR and the ICO's children's guidance / Age Appropriate Design Code.
- The platform is operated by adults. Children see the software — flashcards are displayed on screen for the pupil to read aloud during an assessment — but they do not hold accounts, do not log in, and do not operate it: all navigation, recording and scoring is carried out by the teacher or teaching assistant, who is present throughout.

School to add: any prior concerns raised by parents, community expectations, and how this fits your wider data protection posture.

Purposes — what you want to achieve:

- Accurate recording and tracking of pupils' phonics progress to inform teaching and support decisions.

Step 3 — Consultation

Record who you consulted and how their views were taken into account (e.g. teaching staff, SENCO, DPO, and — where appropriate — parents/pupils).

School to complete: who was consulted, when, and how their views shaped this assessment. If you decided not to consult data subjects, record why.

Step 4 — Assess necessity & proportionality

Note on voice recordings and biometric data: a voice sample is special category (Article 9) biometric data only where it is processed to identify a person by their voice (Article 4(14) UK GDPR; Recital 51 applies the same test to photographs — a photo is not special category unless run through facial-recognition-type technology). Because these recordings are used only to assess pronunciation, and identity comes from the pupil name a teacher enters rather than from the voice, they fall outside Article 9 — and this holds whether or not a link between the recording and the pupil is retained in the software. Where a link is retained, the recording is still the child's personal data and the ordinary duties below apply to it in full.

Lawful basis (Art 6)	<i>Determined by the school. For maintained/state schools this is typically Article 6(1)(e) — public task. [Confirm and record your basis.]</i>
Special category condition (Art 9)	<i>Two questions. SEND data (health/disability): usually needs Art 9(2)(g) substantial public interest, or explicit consent — [confirm with your DPO]. Voice recordings: not special category, because they are not used to identify pupils by voice (see the note above), so no Art 9 condition is needed for them.</i>
Consent responsibility	Consent for entering educational needs and support data is the school's responsibility, not Hearo's.
Data minimisation	Only data necessary for phonics assessment is collected; SEND access restricted to teachers/SENCOs. Whether voice recordings retain a link to the pupil is a design decision under review; recordings are not used to identify pupils by voice.
Transparency	Privacy Policy plus a parent/pupil explainer are provided for the school to distribute to meet Articles 13/14.
Processor compliance	Hearo processes only on documented instruction under an Article 28 Data Processing Agreement; sub-processors (AWS) are covered by flow-down terms.
Individual rights	Hearo assists the school in responding to access, rectification, erasure and objection requests (Arts 15–22).
International transfers	None outside UK/EEA.

Step 5 — Identify & assess risks

Assess the likelihood and severity of harm to individuals for each risk. The rows below are pre-populated for this platform; add any risks specific to your setting.

Risk to individuals	Likelihood	Severity	Overall risk	Ref
Voice recording held or exposed as identifiable child data (esp. if a link to the pupil is retained)	Possible	Significant	Medium	R1
Unauthorised access to pupil or SEND data	Possible	Significant	Medium	R2
Data retained longer than necessary	Possible	Minimal	Low	R3
Sub-processor / hosting outside UK/EEA	Remote	Significant	Low	R4
Lack of transparency to parents / pupils	Possible	Minimal	Low	R5
[Add any school-specific risk]				R6

Step 6 — Identify measures to reduce risk

For each risk, record the measure, its effect (eliminated / reduced / accepted) and the residual risk.

Ref	Measure to reduce or eliminate risk	Effect on risk	Residual risk
R1	Recordings used only to assess pronunciation, not to identify pupils by voice, so they stay outside special category (Art 9). Where no link is needed, recordings are anonymised; where a link is retained, it is protected by role-based access, encryption and the retention schedule.	Reduced	Low
R2	Role-based access; SEND data visible only to teachers/SENCOs; encryption in transit and at rest.	Reduced	Low
R3	Retention schedule: 3 years after a pupil leaves; 90-day deletion window after subscription ends.	Reduced	Low
R4	Data hosted on AWS UK/EEA infrastructure; no transfers outside UK/EEA.	Eliminated	Low
R5	Privacy Policy plus parent/pupil-facing explainer provided for the school to distribute.	Reduced	Low
R6	[School to complete]		

Step 7 — Sign off & record outcomes

Measures approved by	[Name, role, date]
Residual risks approved by	[Name, role, date]
DPO advice provided	[Summary of DPO advice; note if any advice was not followed and why]
DPO advice accepted / overruled	[Record decision]
Consultation with the ICO needed?	Only if a high residual risk remains that cannot be mitigated. [Yes / No]
This DPIA will be kept under review by	[Name / role]
Next review date	[Date]

Retain the completed DPIA with your data protection records and revisit it if the processing changes.

This template is provided by Hearo Phonics Ltd to support schools and does not constitute legal advice. It reflects UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 as at July 2026.