TMGCL Ed: Data Protection & GDPR Compliance Checklist

Subject: Evidence of Compliance for Schools

Date: March 2026

This document provides a point-by-point verification of how the TMGCL Ed program meets the strict data protection requirements for UK educational settings, specifically regarding the **UK GDPR** and the **ICO Children's Code**.

1. Data Residency & Infrastructure

- [x] **UK-Based Storage:** All personal data is stored in the **AWS London (eu-west-2) Region**. No data is transferred outside the UK.
- [x] **Secure Hosting:** We utilise **Amazon EC2** with robust firewalls and regular security patching to prevent unauthorised access.
- [x] **Encryption:** All passwords (teacher and student) are **hashed and encrypted** using industry-standard protocols. TMGCL Ed staff cannot view or access these.

2. Data Minimisation (Article 5)

- [x] **Essential Collection Only:** We only collect:
    - **Teachers:** Name, School Name, and Academic Email.
    - **Students:** Name, Class, and Username (Teacher-assigned or system-generated).
- [x] **Anonymous Participation:** Students can choose a **nickname** to stay anonymous to other schools during competitions.
- [x] **No Special Category Data:** We do not collect health, biometric, or ethnic data.

3. Safeguarding & "Privacy by Design"

- [x] **Closed Community Architecture:** Students can only interact within their own verified school community. There is **no way to connect** with users from other schools.
- [x] **Internal-Only Invites:** "Friend Requests" and "Team Invites" are strictly confined to the internal school environment. External discovery or searching for users outside the school is disabled.
- [x] **Zero Chat Policy:** There is **no text or voice chat system**. This eliminates the risk of online bullying, grooming, or the sharing of personal information between students within the TMGCL Ed environment.
- [x] **Public Ranking Privacy:** Public leaderboards **only** show a student's chosen nickname, school name, and game progress. No individual profiles or contact details are ever accessible to the public.

4. Controller & Processor Controls

- [x] **Teacher Oversight:** Teachers have the authority to manage student credentials (change usernames/passwords) and monitor classroom participation.
- [x] **Deactivation vs. Deletion:** Teachers can instantly **deactivate** a student account to stop all their activity. For permanent **deletion** of all records, TMGCL Ed performs a secure wipe upon a formal request from the school.
- [x] **Role-Based Access:** TMGCL Ed staff have no access to student passwords and can only access the database for essential technical maintenance or at the school's request.
- [x] **Accountability:** We maintain a Record of Processing Activities (RoPA) available for the school's DPO to audit.

5. Compliance with the "Children's Code" (2025/26 Updates)

- [x] **High Privacy by Default:** All student accounts are set to the highest privacy settings automatically upon creation.
- [x] **No Nudge Techniques:** The app does not use "nudge" techniques to encourage children to share more data or stay online longer.
- [x] **Age Appropriate Language:** Our student-facing privacy notice is written in clear, simple language that a child can understand.