

The below forms a response to the most common queries that were put to school around the move to using the Blackout App. The first two sections respond to individual questions around school and App use. The third section has more broad information covering a range of technical and GDPR related matters.

School related

Why does the child need the blackout app if they agree to have the phone switched off and in their bag during the school day?

Phones that have been used or seen on site for *any* reason will be confiscated. The App offers an extra layer of security to guard against a student being tempted to look at or use their phone.

The restrictions on iPads are often not turned off in school holidays, how can you ensure this doesn't happen with the blackout app?

Training days and holidays are pre-programmed into the dashboard prior to the start of the academic year to avoid this issue. Furthermore, students can log out of the App should there be a mistake with this.

A query about how children are meant to access their bus passes - they all have them on their phones and the Ticket App does not load quickly from the phone being switched off. Waiting to cross the white line is likely too late.

We are confident that there will be sufficient time for students to switch on phones and load up relevant Apps. Buses will not leave until staff are sure all students in need of one are on their bus.

What is the school's legal basis for mandating third-party software installation on privately owned devices?

The use of Blackout helps support the school's move to reduce students' use of mobile phones during the school day. Other options have been considered but disregarded. Students have the option of bringing no phone or a brick phone into school instead of a smartphone with the App enabled.

What alternative arrangements exist for students whose parents or carers do not consent to installation?

Students can choose to not bring a mobile to school, or they can bring in a brick phone.

App usage

Can this be turned off if the child is not in school?

Yes

Are inset days and half days already programmed in as part of the school day?

Yes

Can you explain the time restrictions on the blackout app?

This is expected to be set between school hours (8:30 until 3:00) Monday to Friday.

Who has admin control over the blackout app?

Staff in school.

Is it set on times or location?

Time. If it was set on location this would mean the App would have to always track a student's location, this is something Blackout have actively worked to avoid.

What if my child has a small memory capacity phone and has no storage space to install another app?

The App takes up a very small amount of data.

Does the Blackout App prevent tracking the phone (e.g. Life360)?

No, Apps like 'Find my' and 'Life360' still work when Blackout is enabled.

Will there be any limitations on the student being able to make calls or send texts during school hours?

No system is foolproof. The App ensures that smart phones act as 'Brickphones' when in use. This means that text and phone calls are still able to be made. However, our stance on use of phones in schools means that we do not expect this to become an issue.

The line that staff are notified if the app is removed suggests an ongoing monitoring link between the device and the school. Could you explain exactly what is monitored and how?

Students have a unique code to them which they enter into the App when they download it. This tags the phone to the dashboard and allows monitoring to take place as appropriate during the hours of use. This simply shows that the App is installed and registered, then that it is working during the times the phone is 'Blacked out'. If a student unregisters this is flagged on the dashboard (there may be many reasons for this – eg: a child is at home for the day due to illness). After the initial set up and installation the dashboard will not, as a matter of course be monitored daily. Appropriate staff will get a daily report indicating which devices have been disconnected and if necessary this will be followed up.

DPIA, GDPR and lawful basis

The school is responsible for completing its own data protection assessment before implementing any new system involving student data. Blackout supports this process by providing relevant documentation, including their Privacy Policy, DPIA information, data processing details and technical information about how the app operates.

The lawful basis for processing student data is determined by the school as the data controller. Blackout acts as a data processor, processing only the limited information required to operate the service and support the school's smartphone-free policy.

The school's completed DPIA is available on request.

What data is collected and shared

The personal data processed by Blackout is limited. This includes:

- Student name
- School email address

- Year group/ form
- Device type

The app also shares a small amount of operational device information with Blackout and approved school administrators to ensure the service is working correctly. This may include:

- Device type, such as iPhone or Android
- Whether the app is up to date
- Whether the required permissions have been accepted
- Battery percentage
- Whether the device is currently blocked
- Whether the app has been removed or is no longer functioning as expected

Blackout does not collect browsing history, message content, call content, photos, contacts, location data or personal content from the device.

Where data is stored and who has access

Blackout data is stored securely using AWS servers in Dublin. Data is not sold, used for advertising, or shared with unrelated third parties.

Access is limited to approved Blackout staff for implementation and technical support purposes, and to authorised school administrators through the school dashboard.

The school remains the data controller. Blackout processes data only for the purposes of delivering and supporting the service.

How the app works and how removal is detected

Blackout works by applying scheduled restrictions during the school day. During these times, distracting apps and services are blocked in line with the school's policy, while essential functions such as calls and SMS remain available for emergencies.

If the app is removed, disabled, out of date, or no longer communicating correctly, this is shown on the school dashboard. The notification is based on the device no longer appearing as compliant or active within the system. This allows the school to follow up as they feel appropriate based on their mobile phone policy.

Permissions and control of the device

On iPhone, Blackout requires Apple system permissions that allow the App to apply restrictions during school hours. These permissions are needed for the App to function.

Blackout does not give the school or Blackout open access to the device. The App cannot read private messages, access photos, track location, wipe the device, or view personal content.

Blackout does not operate as a full Mobile Device Management system in the way a school-owned device management platform would. It is designed specifically to apply scheduled blocking during school hours.

Security, incidents and cyber risk

Blackout takes security seriously and has internal processes in place to protect the limited data processed through the system.

If a data breach or cyber incident were to occur, Blackout would follow its incident response process and notify the school in line with its data processing obligations. The school would then assess any requirement to notify parents, students or the Information Commissioner's Office.

Parent and student rights

Parents and students have rights under UK GDPR, including rights of access, rectification, objection, restriction of processing and complaint. The data blackout collects can also be downloaded directly via the App.

When a student leaves the school, or when the app is no longer required, the relevant data can be removed in line with the school's retention process and Blackout's data processing arrangements.

If Blackout's Privacy Policy or Terms are updated in future, schools will be informed so that they can communicate any relevant changes to parents.

Evidence, proportionality and why the school is using Blackout

Blackout is designed to support schools that want to move beyond simply asking students not to use smartphones during the school day. It helps create a consistent approach by reducing access to distracting apps while still allowing emergency communication through calls and SMS.

The aim is not to monitor students, but to support the school's mobile phone policy in a practical and proportionate way. Schools use Blackout to improve focus, reduce distraction, support safeguarding and promote healthier digital habits.

Blackout also provides schools with implementation support, parent communication resources, staff training, technical support and ongoing operational guidance.

The school has chosen this approach because it allows students and parents to retain emergency contact while supporting a smartphone-free school environment.