RECORD OF PROCESSING ACTIVITY

The Organisation:

Details of record owner	Inspire Partnership

Industry Sector	Education

Number of Employees	500

Number & location of offices worldwide	10

Approx. global revenue	

The nature and purposes of the processing	

Joint Controller	Stephen Schwartz

Data Protection Officer	The DPO Centre Ltd.

OWNER	Department	Process Name / Identifier	System(s) used	Brief description of processing activity	Purpose of processing activity	Categories of data subject	Categories of personal data	Special category data	Lawful basis of processing personal data	Condition of processing special category data	Recipients of data within the European Union	Reason(s) & purpose(s) of transfer	Recipients of data outside the European Union (including international organisations)	Reason(s) & purpose(s) of transfer	Certification or mechanism permitting international transfer	Retention Period / Deletion concept	Encryption	Access rights	Date of entry	Date last modified	Name and contact details of process owner	DPO comments	DPIA recommended	Notes
	General			Processing activity			Dataset		Legality		Transfer of data					Retention		Security		Document control		DPO review		
	School systems - admin / pastoral																							
Stephen Schwartz	School systems	Student and staff information management	Arbor	MiS system used to manage student and staff information	A central repository of student and staff information	1. Students 2. Staff 3. Parents/Guardians	Arbor data map — STAFF 1. Nationality 2. Religion 3. Ethnicity 4. Equal 5. Opportunities data	STAFF / STUDENT 1. Ethnicity 2. Religion 3. Medical	E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller	G. Substantial public interest						Staff Data is kept for current year+6 after staff has left. Pupil records DoB+18. SEND/LAC Pupil records for DoB +25 years- currently this is not deleted (currently all data is kept until IICSA has issued its recommendations)	Yes	Unique login and password Access to system limited to roles given by Administrator						https://arbor-education.com/about-us/data-protection-gdpr/Data Protection and GDPR	We exceed industry standards. https://arbor-education.app.box.com/v/gdpr-how-we-comply#
Stephen Schwartz	School systems	Productivity and communication tools.	Google workspace for Education (plus - with additional security features)	Document, spreadsheets, presentations and publishing. Data storage. Communication tools	Create teaching and learning materials, admin work, secure access and password controlled storage.	1. Staff 2. Pupils 3. Parents	Login information, group membership, class details		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							In line with the data retention policy.	Yes	Unique login and password Access to system limited to roles given by Administrator						Google cloud - processing terms and conditions - https://admin.google.com/terms/apps/8/1/en/dpa_terms.html https://cloud.google.com/privacy/data-protection-impact-assessment
Stephen Schwartz	School Systems / Safeguarding	Safeguarding	CPOMS	All safeguarding issues held	All safeguarding issues held	1. Students 2. Parents 3. Staff	STUDENT 1.Name 2. DOB 3. Email 4. Location data 5. Next of kin - address, telephone number (home) and (mobile) 6. Education services 7. Gender 8. Dietary needs 9. Medical details 10. SEND Status 11. Behaviour 12 Attached documents PARENT 1. Name 2. Address 3. Telephone Number 4. Email Address	STUDENT 1. Ethnicity 2. Religion 3. Medical	C. Compliance with legal obligation(s)	G. Substantial public interest						DoB +25 years until IICSA report kept indefinitely	Yes	Restricted access by Login and access rights. Staff with higher level access only by 2FA.						Data processing information is on the CPOMs SLA agreement – there is individual one for each school. https://drive.google.com/drive/folders/1LxC44U9ybSwKJgnx-8pxzq3fhsg75TY6?usp=share_link
Stephen Schwartz	School Systems / Safeguarding	Safeguarding / Referral forms	Paper copy	Recording of safeguarding issues	Safeguarding RED FILE	1. Pupils 2. Sibling 3. Parent	1. Name 2. Address 3. DoB 4. Contact details 5. Safeguarding issues	1. Health/Medical data	C. Compliance with legal obligation(s)	G. Substantial public interest						DoB +25 years until IICSA report kept indefinitely	N/A	Restricted to Designated Safeguarding Lead(s) and 1 Admin						
Stephen Schwartz	School systems	User ID management and Teaching and learning resources	LGFL USO -	General Privacy Statement Saved Information about LGfL Access Management Federation - https://static.lgfl.net/LgflNet/downloads/learning-resources/lgflaai.docx Through the federation schools share information with Purple Mash via LGfL Google workspace via LGfL J2E via LGfL JANET video conferencing via LGfL Listening Books via LGfL London MLE via LGfL Mathletics via LGfL Busy Things via LGfL	LGfL single sign-on and user identity management	1. Students 2. Staff 3. Parents/Guardians	Arbor data set export details		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller	G. Substantial public interest						Inline with data retention policy.	Yes	Restricted access by login. Data set requires 2FA						LGfL GDPR information https://drive.google.com/drive/folders/1jGAMkmoQFdHW7f2nDUD20-yHjl_YTXR_2?usp=sharing
Stephen Schwartz	School systems - staff training	Tracked professional development resources	Educare	Information used to manage and track staff users to the system	Generate user accounts and tracking of training completed	1. Staff	STAFF 1. Name 2. DOB 3. Email		C. Compliance with legal obligation(s)							Inline with data retention policy.	Yes	Restricted Access by Login						Data processing agreement - https://drive.google.com/file/d/1owsnoqYO3C3dL-H255jT2JbXDvIfGMRdM/view?usp=share_link
Stephen Schwartz	School systems - teaching and learning	Teaching and learning resources	2Simple Purple Mash	Information used to manage and track staff and pupil users on the system	Generate user accounts and link teachers to their classes	1. Staff 2. Student	Staff 1. Name 2. Class 3. Email Student 1. Name 2. Class 3. Year group		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Restricted Access by Login	Yes	Restricted Access by Login						Data processing agreement = https://drive.google.com/file/d/1ramDp0WgaSBdWWuKStA0TTeB7G36BMQM/view?usp=share_link
Stephen Schwartz	School systems - teaching and learning	Teaching and learning resources	Little Wandle	Information used to manage and track pupil attainment	Track pupil attainment	1. Pupils	Student 1.Name 2. Year group 3. Outcomes		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Inline with data retention policy.	Yes	Restricted Access by Login						
Stephen Schwartz	School systems - teaching and learning	Learning platform	Lyfta	Learning Platform	Online learning resource	1. Pupils 2. Staff	1. Names 2. Email addresses 3. pupil identifier		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							No recordings are kept?	Yes	Restricted access by login						Lytfa DP details and information https://www.lyfta.app/general-5
Stephen Schwartz	School systems - teaching and learning	ONLINE READING RESOURCES	BUG CLUB - PEARSONS	ONLINE READING AND TRACKING SYSTEM	Enable pupils to access resources linked to learning	1. Pupils 2. Staff	1. Name 2. DoB 3.Class name 4. Year group 5. Staff email		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Privacy statement says data is only kept as long as needed for processing or legally required		Restricted access by login						Privacy information on Pearson Website - I have enquired about DPA https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy/digital-learning-services-privacy-policy.html. Additional GDPR documents shared by Pearsons - https:
Stephen Schwartz	School systems - teaching and learning maths	Learning resources - maths	Times Tables Rockstars	Maths learning platform for delivery of maths curriculum	Online learning resource	1. Pupils 2. Staff	1. Name 2.Class 3. DoB		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							The company will delete data following a written request from the school								DPA - https://drive.google.com/file/d/1-rPN5-PXWznX9U3XkM4Q1aFmpyIsa6ST/view?usp=sharing
Stephen Schwartz	Admin	Pupil admissions	SAM Portal	Central LA portal for the processing of admissions	Central LA portal for the processing of admissions	1. Parents 2. Pupil	1.Name 2. DOB 3. Email 4. Location data 5. Next of kin - address, telephone number (home) and (mobile) 6. Education services 7. Gender 8. Dietary needs 9. Medical details 10. SEND Status 11. Behaviour 12 Attached documents		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller															
Stephen Schwartz	Admin	Children FSM	Cool Milk	Portal for the administration of free school milk provision	Hard Copy of Staff data held	1. Parents 2. Pupils	1. Name Parents 2. Name pupil 3. DoB		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Held until child has left		Restricted access by login						https://www.npschools.co.uk/_site/data/files/documents/gdpr/5E10CAF3EFC1E1105022B5340405389F.pdf

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Stephen Schwartz	Admin	LGfL Gridstore	LGfL Grid store - backups of redundant SIMs data - due for disposal Jan 2023	Data Storage/Support and remote backup and disaster recovery	Data Storage/Support and remote backup and disaster recovery	1. Parents 2. Pupils 3. Staff	STAFF 1. Name 2. DOB 3. Email 4. Location data- address, postcode 5. Mobile/ home phone number 6. Next of kin 7. Financial history 8. Gender 9. Employment History 10. Education and training qualifications 11. Teachers reference number 12. QTS certificate number 13. References STUDENT 1.Name 2. DOB 3. Email 4. Location data 5. Next of kin - address, telephone number (home) and (mobile) 6. Education services 7. Gender 8. Dietary needs 9. Medical details 10. SEND Status 11. Behaviour 12 Attached documents PARENT 1. Name 2. Address 3. Telephone Number 4. Email Address 5. Relationship details	STAFF 1. Nationality 2. Religion 3. Ethnicity 4. Equal 5. Opportunities data STUDENT 1. Ethnicity 2. Religion	B. Performance of a contract to which the data subject is party	G. Substantial public interest						Held until child has left		Restricted access by login						Is being phased out as most documents and information is held by Arbor and Google
	Admin	Cantium Business Solutions	Cantium Business Solutions	SIMS provision/ support and remote backup and disaster recovery	SIMS provision/ support and remote backup and disaster recovery	1. Parents 2. Pupils 3. Staff	STAFF 1. Name 2. DOB 3. Email 4. Location data- address, postcode 5. Mobile/ home phone number 6. Next of kin 7. Financial history 8. Gender 9. Employment History 10. Education and training qualifications 11. Teachers reference number 12. QTS certificate number 13. References STUDENT 1.Name 2. DOB 3. Email 4. Location data 5. Next of kin - address, telephone number (home) and (mobile) 6. Education services 7. Gender 8. Dietary needs 9. Medical details 10. SEND Status 11. Behaviour 12 Attached documents PARENT 1. Name 2. Address 3. Telephone Number 4. Email Address 5. Relationship details	STAFF 1. Nationality 2. Religion 3. Ethnicity 4. Equal 5. Opportunities data STUDENT 1. Ethnicity 2. Religion	B. Performance of a contract to which the data subject is party	G. Substantial public interest						Held until child has left		Restricted access by login						Is being phased out as most documents and information is held by Arbor and Google
COMMUNICATION																								
Stephen Schwartz	Communication	Parent email	SchoolComms	Communication to parents	General information/ update to parents	1. Parents 2. Pupils 3. Staff	1. Staff Names 2. Pupil Names 3. Parent Names 4. Email addresses 5. Telephone numbers (SMS)		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Held for 3 years	Yes	Restricted access by login						Will be phased out by the end of 2023 and replaced with Arbor
Stephen Schwartz	Communication	Parent email	ParentMail	Communication to parents	Email, general letter information	1. Parents 2. Pupils 3. Staff	1. Staff Names 2. Pupil Names 3. Parent Names 4. Email addresses 5. Telephone numbers (SMS)		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Held for 3 years	Yes	Restricted access by login						Will be phased out by the end of 2023 and replaced with Arbor
Stephen Schwartz	Communication	Website / cms management	4foreducation	School website – outward facing	Management of users	1.Staff	1. Staff Names 2. Email addresses 3. Telephone numbers		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Until member of staff no longer required to manage the website	Yes	Restricted access by login						https://resources.e4education.co.uk/gdpr/e4education_GDPR.pdf
Stephen Schwartz	Teaching and learning	Phonics teaching and tracking resource	Little Wandle	Pupil tracking / assessment	Support teaching and learning	1. Pupils 2. Staff	Staff 1. Name 2. Class 3. Email Student 1. Name 2. Class 3. Year group		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Until the pupil has completed phonics screening	Yes							Privacy Policy.
FINANCE																								
Yajna Sooklall	Finance	Payroll	Juniper Education Services Limited	Staff payroll records	Comply with financial regulations	1. Staff	1.Names 2. Addresses 3. Financial details 4. Staff Absence 5. Work returns		B. Performance of a contract to which the data subject is party							As per retention schedule	Yes							https://junipereducation.org/privacy-policy/
Yajna Sooklall	Finance	Accounting software	PS Financials	Financial system to record all financial transactions	Comply with financial regulations	1. Staff	1.Staff Names 2.Supplier contact details 2. Addresses 3. Financial details 4. Email Address		B. Performance of a contract to which the data subject is party							Current year plus 6 as per financial regs	Yes	Restricted access by login						
Yajna Sooklall	Finance	Financial budgeting	IMP	Schools financial budgeting system	Comply with financial regulations	1. Staff	1.Staff names 2. NI numbers 3. Pay 4. Contract details		B. Performance of a contract to which the data subject is party							Current year plus 6 as per financial regs	Yes	Restricted access by login						
Yajna Sooklall	Finance	Financial records	Parent Pay	Receiving payments from parents	General accounting system - includes details on pupils for financial support	1. Suppliers 2. Pupils 3. Staff	1. Names 2. Email addresses 3. Financial details - full details here https://www.parentpay.com/privacy-policy/		B. Performance of a contract to which the data subject is party							Current year plus 6 as per financial regs	Yes	Restricted access by login						
Yajna Sooklall	Finance	Commercial Banking	Lloyds	All payments and receipts. Credit card payments	All commercial banking transactions	1.Staff	1. Name 2. Role 3. Address, 4. Date of birth 5. Telephone number 6. Work Email address		B. Performance of a contract to which the data subject is party							Current year plus 6 as per financial regs	Yes	Restricted access by login						
	Governance																							

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Julie Newman	Governance	Governor	Governor Hub	Details in Governor/ Trustee minutes meetings	Have to have a record of Governor/ Trustee meetings minutes	Governors Trustee Staff	1. Details of minutes 2. Numerous information on multiple actors		C. Compliance with legal obligation(s)							Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years	Yes	Restricted access by login						https://help.governorhub.com/en/articles/586895-privacy
HR																								
Arlene Brathwaite-Pile	HR	HR staff and recruitment portal	TES	Online recruitment system	Records recruitment data. This can be done by the Trust or direct with the schools	1. Prospective Staff	1. Name 2. DOB 3. Email 4. References 5. Child care disqualification 6. Judgements/Sanctions 7. HMRC details 8. Banking/Credit 9. Passport no. 10. Driving licence no. 11. Risk Assessments 12. Contract details 13. Teacher Qualifications	1. Race/Ethnicity 2. Health/Medical data	B. Performance of a contract to which the data subject is party	B. Obligations and rights in the field of employment and social security and social protection law						Successful applicants - Transferred to Hard copy Current year +6 after staff has left. Unsuccessful applicants held for 6 months and then disposed	Yes	Restricted access by login						
Arlene Brathwaite-Pile	HR	DBS checking	Online portal	DBS background checks on staff as part of recruitment process	To comply with rules around safeguarding and right to work	1. Staff	1. Name 2. DOB 3. Email 4. External ID 5. Passport no. 6. Driving licence no.	1. Race/Ethnicity 2. Criminal Offences 3. Criminal Convictions	C. Compliance with legal obligation(s)	B. Obligations and rights in the field of employment and social security and social protection law						Current year +6 after staff has left.	Yes	Restricted access by login						
Arlene Brathwaite-Pile	HR	Single Central Record	Excel spreadsheet	Record of dbs check; right to work documentation has been seen	To comply with legal obligations in the workplace	1. Staff 2. Visitors 3. Volunteers 4. Regular contractors 5. Teaching students 6. Professional services	1. Name 2. DoB 3. Address 4. Employment details 5. Photos ID seen 6. Teaching qualifications details 7. DBS number 8. DBS	1. Race/Ethnicity 2. Criminal Offences 3. Criminal Convictions	C. Compliance with legal obligation(s)	B. Obligations and rights in the field of employment and social security and social protection law						Current year +6 after staff has left.	Yes	Restricted access by login						
Arlene Brathwaite-Pile	HR	Occupational Health records	Medigold	Recording of OH issues	To comply with legal obligations around fitness to work	1. Staff	1. Name 2. DoB 3. Address 4. Telephone numbers 5. Email addresses	1.Medical history/ details 2. Reasons for referral	C. Compliance with legal obligation(s)	B. Obligations and rights in the field of employment and social security and social protection law						Current year +6 after staff has left.	Yes	Restricted access by login						
SECURITY																								
STAFF ADMIN	Security	Staff access -	Inventry	Inventry system that allows staff access to building	Inventry system that allows staff access to building	1. Staff	1. Name 2. Photo 3. Building enter date and time		E. Performance of tasks carried out in the public interest or exercise of official authority vested in the controller							Until staff leave	?	?						
STAFF ADMIN	Security	CCTV	[No of cameras]	[CCTV recording - externally]	CCTV footage captured for security and safeguarding purposes	1. Students 2. Staff 3. Visitors	Recording video	N/A	F. Legitimate interests which are not overridden by the interests, rights or freedoms of the data subject								?	?					?	
Estates																								
Alan Williams	Admin	Health and safety advice	Judicium (Jedu)	Staff Details	Advice to users on H&S queries and the sharing of H&S reports and updates	Staff	Name Role Email		B. Performance of a contract to which the data subject is party							Current year plus 6 from when staff leave	Yes	Restricted Access by login						
Alan Williams	Admin	Health and safety advice	Gallagher	Staff Details	Advice to users on H&S queries and the sharing of H&S reports and updates	Staff	Name Role Email		B. Performance of a contract to which the data subject is party							?	?	Tbc						
Alan Williams	Admin	Compliance & Asset Management	Parago	Staff Details	Users maintain system to record & monitor compliance	Staff	Name Role Email		C. Compliance with legal obligation(s)							?	?	Restricted Access by login						