

Key facts that schools in Wales need to know about FFT Aspire in relation to GDPR



With the Data Protection Act (DPA) being superseded by the General Data Protection Regulation (GDPR) on 25th May 2018, it is important for schools to ensure that their systems satisfy the requirements of GDPR. When GDPR comes into force, the legal basis under which FFT will hold and process personal data for pupils and users of FFT Aspire is that of legitimate interest.

The answers to the key questions that school in Wales have about FFT Aspire in relation to GDPR are given below.

Scope	Which personal and special category data are contained within the system?	<p>FFT Aspire holds the following personal and special category data.</p> <p>Pupil data</p> <ul style="list-style-type: none">• Details of which pupils are on-roll• Current and prior attainment data for each of the key stages covered by your school• Pupil absence information• Pupil information from School Census• Pupil estimates, targets & assessments• Information on allocation of pupils to pupil groups <p>Special Category Pupil Data</p> <ul style="list-style-type: none">• Ethnicity & Language• SEND Information <p>Aspire User Details</p> <ul style="list-style-type: none">• Contact details including job title• Aspire role & details of system usage <p>On-roll updates, targets, pupil group information, pupil notes and Aspire user details are provided by schools. All other personal data held in Aspire is provided by local authorities or derived by FFT from local authority provided data.</p>
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<p>Sharing</p>	<p>Does any personal data flow from the system onto anywhere else?</p>	<p>Pupil personal data</p> <ul style="list-style-type: none"> • The data in Aspire is shared with the following prescribed organisations: Schools, Local Authorities and Regional Educational Consortia. • FFT may share information provided by a school with the school's Local Authority and Regional Educational Consortium. The sharing of pupil level targets is under control of the school and pupil notes are not shared. <p>Aspire User Details</p> <ul style="list-style-type: none"> • Aspire user information may be shared with the school's Local Authority for administrative purposes where the school has subscribed through the LA. • Aspire user name and contact information may be shared with vendors who are providing services to FFT in the delivery of FFT Aspire. These include email/mail services to enable FFT to communicate with users and schools, FFT's customer management system which is used for user support and to manage Aspire subscriptions and services to allow the electronic signature of contracts and agreements.
<p>Retention</p>	<p>What is the system's data retention policy?</p>	<p>The following will be implemented prior to GDPR coming into effect.</p> <p>Pupil personal data</p> <ul style="list-style-type: none"> • All pupil data provided to Aspire by the school will be removed from the school's portal no longer than 6 months after: <ul style="list-style-type: none"> • the school informs FFT that the pupil has left • the pupil completes the highest national curriculum key stage for the school • the school's subscription comes to an end • Un-named pupil information will be retained in the Aspire database for auditing purposes for up to 5 years. <p>Aspire User Details</p> <ul style="list-style-type: none"> • Details of Aspire users and their system usage are retained for up to 5 years for audit purposes after which these are destroyed.

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Access	How would you get the information for a subject access request out of the system?	The information required to respond to a pupil subject access request is already available through FFT Aspire pupil reports which can be output in a number of electronic formats.
Security	How does the system ensure the security of the personal data held?	<ul style="list-style-type: none"> • Aspire data is stored in FFT's secure environment. This is hosted in the UK by AWS (Amazon Web Services). • All Aspire data is fully encrypted in transit and at rest. • The Aspire system provides secure role based access. • Aspire has been designed from the start to be highly secure. Security tests are carried out by FFT's own test team with additional checks being carried out by an external Crest Approved Security Tester.
	What recognised standards are in place?	<ul style="list-style-type: none"> • FFT is accredited under ISO27001 & Cyber Essentials Plus (CE+). • As a requirement of the DfE for the ASP concession, FFT Aspire undergoes an annual IT Health Check (ITHC) by a Crest Approved Security Tester. This includes a code review. • All of FFT's staff are BPSS checked.
Own Readiness	Is this system supplier confident that they will be GDPR compliant by May 2018?	Yes – FFT is confident that it will be fully compliant with GDPR by 25th May 2018.

The data sharing agreement for schools using Aspire is covered through the end user license agreement which was accepted by the school on first access to the system. It can be found [here](#).

Schools will be notified of any changes required to align this agreement with GDPR.