

Information sheet: FFT Aspire and GDPR



For school, local authorities, academy trusts and dioceses in England and Wales

Date: 31st May 2019

The new **General Data Protection Regulation (GDPR)** in May 2018 replaces previous Data Protection Act. It is important that schools, local authorities, academy trusts and dioceses ensure that their systems satisfy the requirements of GDPR.

The FFT Aspire standard Terms and Conditions, Terms of Use and FFT's Privacy Notice cover the two-way sharing of data between FFT and all organisations using FFT Aspire:

- [FFT Aspire Terms and Conditions](#) (PDF download)
- [FFT Aspire Terms of Use](#) (PDF download)
- [FFT Privacy Notice](#) (link to www.fft.org.uk website)

Further information about data protection and information security for FFT and FFT Aspire is available on the [FFT website](#).

For GDPR, the legal basis under which FFT hold and process personal data for pupils and users of FFT Aspire is that of legitimate interest.

The Department of Education in England has issued guidance to schools on GDPR (available [here](#)) which recommends that schools ask their system suppliers six key questions about their systems. The answers to these questions for FFT Aspire are given below.

Question 1 (scope): Which personal and special category data are contained within the system?

FFT Aspire holds the following personal and special category data.

Pupil data

- 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

Special Category Pupil Data

- Ethnicity & Language
- SEND Information

Aspire User Details

- Contact details including job title
- Aspire role & details of system usage

The pupil-level data in FFT Aspire is provided to FFT by the government (Department for Education in England) or FFT Aspire customers (schools, local authorities, academy trusts or dioceses). FFT creates additional pupil-level data (e.g. estimates and predictions of future performance) within FFT Aspire.

Question 2 (sharing): Does any personal data flow from the system onto anywhere else?

Pupil personal data

- The data in Aspire is shared with the following prescribed organisations: schools, local authorities, academy trusts and dioceses.
- FFT may share data provided by a customer (e.g. school, local authority, academy trust or diocese) with another customer, with the customer's permission.

Aspire User Details

- Aspire user information may be shared with the school's local authority or academy trust for administrative purposes, where the school has subscribed through the LA or academy trust.
- 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.

Question 3 (retention): What is the system's data retention policy?

FFT's data retention policy for the data provided by customers (schools, local authorities, academy trusts and dioceses) in FFT Aspire is outlined below.

Pupil Data

- All pupil data provided to FFT Aspire by customers will be removed from FFT Aspire no longer than 6 months after:
 - the customer informs FFT that the pupil has left a school;
 - the pupil completes the highest national curriculum key stage at a school; or
 - the customer's subscription term has expired.
- In addition:
 - FFT retains data provided by customers in the FFT Aspire database for national, regional and local research, analytical services and benchmarking services for a period of 48 months after the customer's subscription term has expired.
 - Un-named pupil information will be retained in the FFT Aspire database for auditing purposes for up to 5 years.

Aspire User Details

- Details of FFT Aspire users and their system usage are retained for up to 5 years for audit purposes after which these are destroyed.

Question 4 (access): How would you get the information for a subject access request out of the system?

The information required for customers to respond to a pupil subject access request is already available through FFT Aspire pupil reports which can be created in a number of electronic formats (e.g. PDF or excel).

Question 5 (security): How does the system ensure the security of the personal data held? What recognised standards are in place?

- Aspire data is stored in FFT's secure hosted environment in the UK at Amazon Web Services' London data centre.
- 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.
- FFT is accredited under ISO27001 (international standard for information security) and Cyber Essentials Plus (UK government standard for information security)
- As a requirement of the Department for Education for the ASP concession (FFT's access to national pupil datasets), FFT Aspire undergoes an annual IT Health Check (ITHC) by a Crest Approved Security Tester. This includes a code review. FFT Aspire has fully satisfied the DfE's information security requirements.
- All of FFT's staff are BPSS checked.

Question 6 (own readiness): Is this system supplier confident that they will be GDPR compliant by May 2018?

Yes – FFT confirms that we meet and comply with all of the requirements for GDPR.