

Data Protection Impact Assessment Response – Instill Excellence Ltd

Describe the Information Flows

Collection, Use and Deletion of Personal Data

Instill Excellence Ltd provides attendance and safeguarding support to schools by conducting home visits to pupils who are not attending. To perform this function, the school shares only the minimum necessary personal data, which includes:

- The pupil's name
- Home address
- Parent/carer contact details (telephone or email)

Information Flow Process:

- Data is provided directly by the school via secure email on a case-by-case basis.
- The lawful basis for processing is either Contract, where a formal agreement exists with the school, or Recognised Legitimate Interests, in line with the Data Protection and Digital Information Act 2025.
- This basis is supported by statutory safeguarding guidance outlined in:
 - Working Together to Safeguard Children
 - Keeping Children Safe in Education
- The data is used solely for the purpose of:
 - Conducting the home visit to assess welfare and attendance
 - Providing written feedback to the school

Feedback is provided via email, using only pupil initials to protect identity. In some cases, such as parental consultations or safeguarding updates, feedback may be shared via password-protected documents. Passwords are sent through separate channels, such as phone or text.

Once the visit is complete and the school has received feedback, all associated personal data is permanently deleted from all devices, email accounts, and storage systems. Instill Excellence does not retain any personal data after the purpose has been fulfilled.

Volume of Individuals Affected

This process is used for individual pupil referrals and typically affects 1 to 5 individuals per school intervention. No wider data sets or school databases are accessed or processed.

How Data is Kept Secure

Instill Excellence Ltd is committed to maintaining high standards of data protection and information security. The following measures are in place:

- Two-Factor Authentication (2FA) is enabled on all devices and staff email accounts.
- All devices used for accessing personal data are password protected, encrypted, and

protected with McAfee security software.

- Communications are handled through Gmail, which includes TLS encryption and protection against phishing, spam, and malware.
- Documents shared externally are password-protected, with passwords sent separately.
- Only authorised individuals (e.g. Cheryl Green or designated associates) handle pupil data.
- All staff and associates have undergone training in GDPR, safeguarding, and secure information handling.

Instill Excellence Ltd is registered with the Information Commissioner's Office (ICO) as a data controller and operates in compliance with the UK GDPR and Data Protection Act 2018.

Consultation Requirements

Identifying and Addressing Privacy Risks

Instill Excellence has integrated privacy considerations into every stage of service delivery. Practical steps include:

- Limiting data collection to only what is required for each referral
- Ensuring data is only used for a single, specified purpose
- Applying secure communication practices (encryption, 2FA, password protection)
- Deleting all data immediately after the feedback is shared
- Reviewing internal procedures regularly to reflect best practices and statutory guidance

Internal Consultation:

The Director (Cheryl Green) acts as the Data Protection Lead and reviews each service engagement for compliance. Protocols are updated regularly based on training and regulatory changes.

External Consultation:

Schools and trusts are informed of Instill Excellence's data protection policies during service agreement discussions. Where required, the school or trust's Data Protection Officer (DPO) is consulted to ensure data sharing arrangements meet organisational standards and safeguarding duties.

Alignment with Project Management

Privacy and security procedures are built into each project phase:

- Referral Received: School sends relevant pupil data
- Risk Review: Internal checks ensure lawful basis and secure data handling
- Visit Conducted: Information used strictly for the intended safeguarding purpose
- Feedback Shared: Using initials only; documents password-protected where appropriate
- Deletion: All data permanently deleted from devices and email accounts

Website Annex Notice

This DPIA summary is provided in response to school partner enquiries regarding data handling during attendance support interventions.

It is intended as an annex to our main Privacy Notice (updated June 2025), available on our website.

For more information, contact: cheryl@instill-excellence.com