

FairCall Data Protection Impact Assessment (DPIA) Template

Last updated: February 16, 2026

Instructions

- This template is for school-level adaptation.
- Replace bracketed placeholders with school-specific details.
- Keep this document with your data protection records.

1. Product Description

- What: Cold call equity tracker for teachers.
- Who: Individual teachers in UK schools.
- Why: Improve classroom participation equity and support reflection.

2. Data Collected

- Teacher data: email, password hash.
- Student data: names, optional student ID, optional photo URL.
- Event data: timestamps and optional outcomes (correct, partial, incorrect).

3. Risk Assessment

Risk: Unauthorized access

Impact: Exposure of teacher or student records.

Mitigation: Encryption, authentication controls, tenant isolation.

Risk: Data loss

Impact: Loss of lesson reflection history.

Mitigation: Backup strategy, offline queue, sync recovery.

Risk: Surveillance perception

Impact: Reduced trust and adoption.

Mitigation: Teacher-only framing, reflection-first guidance.

Risk: Student anxiety

Impact: Classroom wellbeing concerns.

Mitigation: Clear positioning, guidance, optional logging behavior.

4. Safeguards

- No free-text notes on students (by design).
- No student-facing features.
- Reflection tool, not grading platform.
- No demographic data collection in MVP.

5. Data Retention and Deletion

- Default retention target: current academic year plus one.
- Teachers can delete class/account data through app controls.
- Account closure follows product retention/deletion controls.

6. Subprocessor List

- Vercel (frontend hosting, USA/EU).
- Railway (backend/database hosting, UK/EU preferred).
- Cloudflare R2 (future option, EU target region).

7. School Customization

- Controller identity: [School/Trust legal entity]
- Lawful basis: [Contract/Public task/Legitimate interests]
- Retention schedule: [School policy]
- DPO review date: [DD Month YYYY]
- Residual risk decision: [Accepted/Mitigated/Not accepted]
- Approval sign-off: [Name/Role/Date]

8. Decision Record

- DPIA outcome: [Proceed/Proceed with actions/Do not proceed]
- Required actions before rollout:

- 1) [Action]
- 2) [Action]
- 3) [Action]

9. Review Cadence

- First review date: [DD Month YYYY]
- Trigger events: security incident, major feature change, legal/policy update.