



Record of Processing Activities (ROPA)

Below is our Record of Processing Activities (ROPA) tailored for Autism Mentors Ltd, aligned with UK GDPR (Article 30) requirements and consistent with your policies.

We have adapted this into a spreadsheet on our cvvc database for ongoing use.

#	Purpose of Processing	Data Subjects / Categories	Types / Categories of Personal Data	Recipients / Categories of Recipients	International Transfers (if any)	Retention Period / Erasure Schedule	Technical & Organisational Security Measures	Lawful Basis (incl. Special Category Condition)	Notes / Comments
1	Provision of mentorship, young people, support adults to clients	Clients (children, young people, adults)	Identifiers (name, DOB, addresses, contact details, health & neurodiversity / SEN information)	Identifiers (name, local authorit ies, school, health professionals, social care)	Internal staff, local based authorit ies, school, health professionals, social care	None / UK-based system (cloud server)	6 years, unless statute of limitations, longer	Encrypted storage, restricted access, role-based permissions, secure physical files, password under	Contract / Legitimate interest / Consent (for health data) + appropriate physical files, password under

		educational reports, behaviour / incident records, safeguarding history		ord on, regular s	Sched ule 1 DPA 2018 for special category data				
2	Safeguarding and protection of individuals	Clients, families, staff, volunteers, incident reports, investigative records, risk assessments	Safeguarding disclosure, MASH, police, LADO, regulators	Local authority, As above	At least 6–25 years (or in line with statutory guidance)	Secure access, , anonymity, misattribution when possible, audit logging, secure deletion when no longer needed	Legal obligation / Vital interest / Public task	Some records may need to be held longer per local authority guidance	
3	Recruitment, HR & staff management	Applicants, employees, contractors, volunteers	Application forms, CVs, references, DBS checks, training	Internal HR team, DBS/enhanced checks, service providers, regulators	None	6 years post-employment or permanent internal HR policy	Access control, secure HR system, , encryption, regular	Contract / Legal obligation	Must handle DBS data especially carefully

			records, supervi sion notes, perfor mance records	ors (if require d)		review & deletio n		(specia l rules)
4	Trainin g & profess ional develo pment	Staff, contrac tors, volunte ers	Trainin g records, CPD eviden ce, qualific ations, certific ates	Internal manag ement, training provide rs, auditin g bodies	None	Duration of employ ment, plus 6 years	Control led access, encrypt ed backup s, role restricti ons	Legitim ate interest / Contra ctual obligati on
5	Comm unicati ons, schedu ling, operati onal admini stration	Clients, staff, familie s	Contact details, email corresp ondenc e, sessio n notes (non- sensitiv e)	Internal staff, (or standar d cloud system provide rs)	None (or as provide rs)	3 years after last contact or as needed	Encryp ted system s, secure email, two- factor authent ication	Legitim ate interest / Contra ct
6	Data protecti on, compla ints, internal	Clients, staff	Data breach records, compla ints	Directo rs, legal advisor s, ICO (if	None	7 years or as require d by statute	Audit trails, restrict ed files, encrypt	Legal obligati on / Legitim ate interest

govern ance	files, audit logs	request ed)	ed storage	grievan ce)
----------------	-------------------------	----------------	---------------	----------------

Additional Notes & Considerations

- Controller / Data Protection Lead
 - Controller: Autism Mentors Ltd
 - Data Protection Lead / Contact: Michelle Wray (DSL)
 - Address, email, and telephone should be documented in full in your master ROPA record.
- Special / Sensitive Categories

Many of your processing activities involve special category data (health, disability, behavioural, safeguarding). You must specify the appropriate condition under Schedule 1 of the Data Protection Act 2018 for each processing activity (e.g. “processing is necessary for the exercise of legal obligations in relation to safeguarding,” or “explicit consent”).

- Processors and Third Parties

If you use external processors (e.g. cloud storage, HR platform, scheduling software), document:

- The processor name and contact details
- The categories of processing they perform
- Assurance they meet UK GDPR obligations
- Updating the ROPA
 - Treat it as a living document — review and update it whenever there's a new processing activity or when systems / contracts change.
 - Assign clear responsibility for maintaining and auditing the ROPA.

- Exemptions for Small Organisations

Under UK GDPR, organisations with fewer than 250 employees may be exempt from maintaining full processing records unless the processing is regular, involves special categories, or is likely to pose risk to data subjects. But because you handle health and safeguarding data, you should maintain full ROPA.

- Retention & Disposal

Ensure your ROPA links to your data retention and disposal policy. For example, client files: how and when they are deleted, archived, or anonymised.

- Security Measures Description

Your ROPA should include a general description of security measures (encryption, restricted access, backups, secure physical storage) to satisfy Article 30 requirements.

- Making It Available

You must make the ROPA available on request to the ICO.

If you like, I can convert this into a fillable Excel template customized for Autism Mentors Ltd, so you and your team can populate and maintain it easily. Would you like me to produce that for you now?