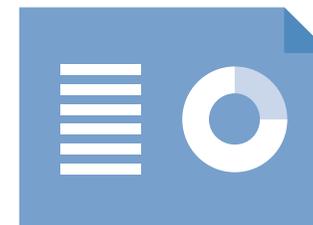


Enquire Learning Trust

Data protection audit report

November 2018

Executive summary



Audit Methodology

The Information Commissioner is responsible for enforcing and promoting compliance with data protection legislation. Article 58(1) of the General Data Protection Regulations (GDPR) states that the Information Commissioner's Office (ICO) has the power to carry out investigations in the form of data protection audits. Section 129 of the Data Protection Act 2018 (DPA 18) also provides provision to carry out consensual audits. The ICO sees auditing as a constructive process with real benefits for controllers and so aims to establish a participative approach.

Enquire Learning Trust (ELT) agreed to a consensual audit by the ICO of its processing of personal data. An introductory meeting was held 22 June 2018 with representatives of ELT to discuss the scope of the audit.

Telephone interviews were conducted on 17 September 2018 and 18 September 2018 prior to the onsite visit. The audit fieldwork was undertaken at Linden Road Academy, Denton and Manchester Road Primary Academy, Droylsden between 25 September 2018 and 26 September 2018.

The purpose of the audit is to provide the Information Commissioner and ELT with an independent assurance of the extent to which ELT, within the scope of this agreed audit, is complying with data protection legislation.

It was agreed that the audit would focus on the following area(s):

| Scope Area | Description |
|-----------------------------|---|
| Governance & Accountability | The extent to which information governance accountability, policies and procedures, performance measurement controls, and reporting mechanisms to monitor data protection compliance to both the GDPR and national data protection legislation are in place and in operation throughout the organisation. |
| Training & Awareness | The provision and monitoring of staff data protection, records management and information security training and the awareness of data protection regulation requirements relating to their roles and responsibilities. |
| Data Sharing | The design and operation of controls to ensure the sharing of personal data complies with the principles of all data protection legislation. |

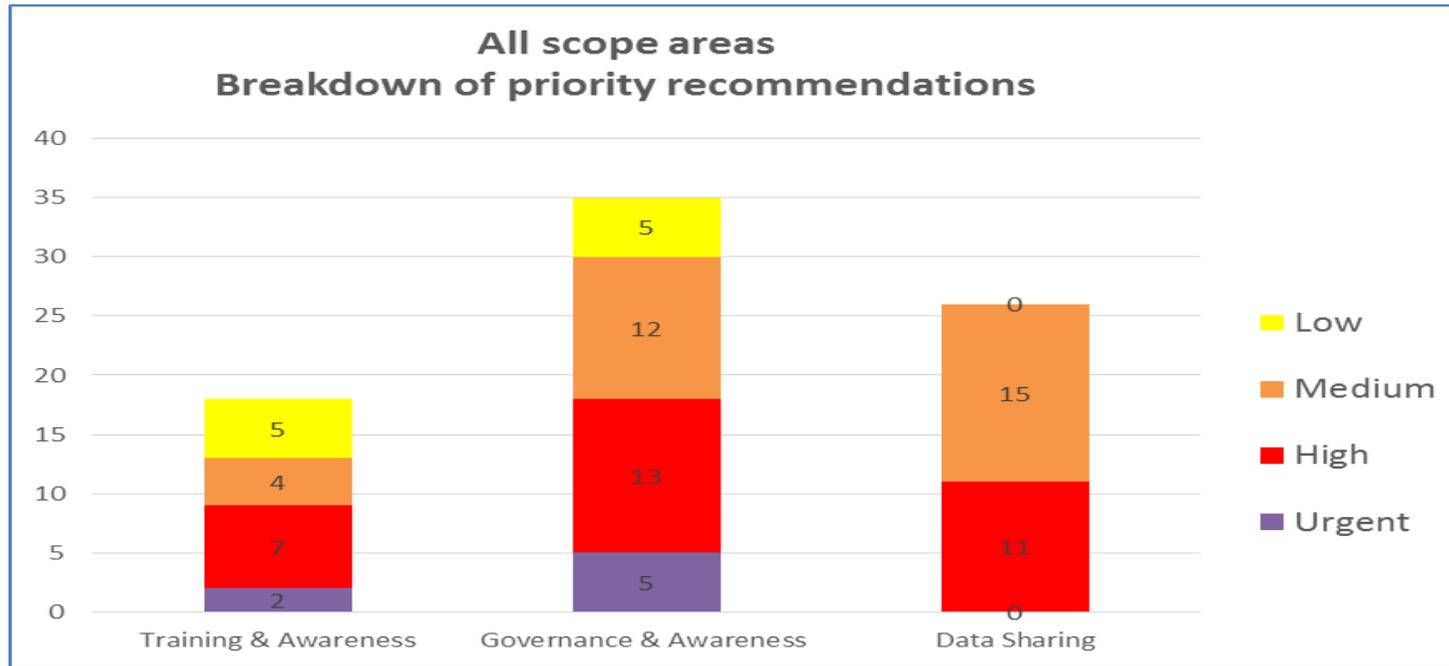
The audit was conducted following the Information Commissioner's data protection audit methodology. The key elements of this are a desk-based review of selected policies and procedures, on-site visits including interviews with selected staff, and an inspection of selected records.

Where weaknesses were identified recommendations have been made, primarily around enhancing existing processes to facilitate compliance with data protection legislation. In order to assist ELT in implementing the recommendations each has been assigned a priority rating based upon the risks that they are intended to address. The ratings are assigned based upon the ICO's assessment of the risks involved. ELT priorities and risk appetite may vary and, therefore, they should undertake their own assessments of the risks identified.

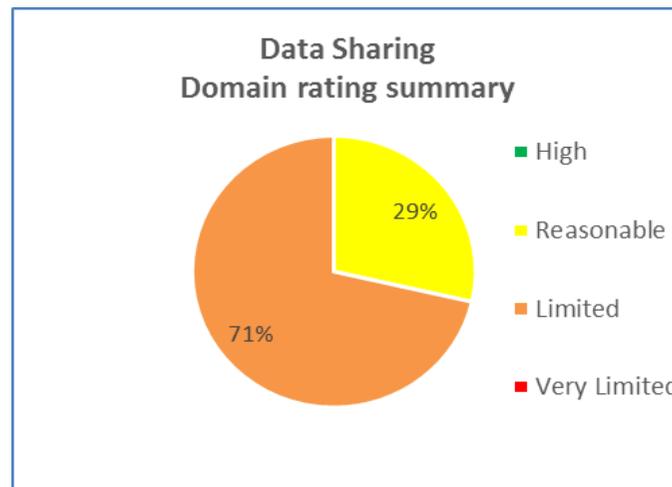
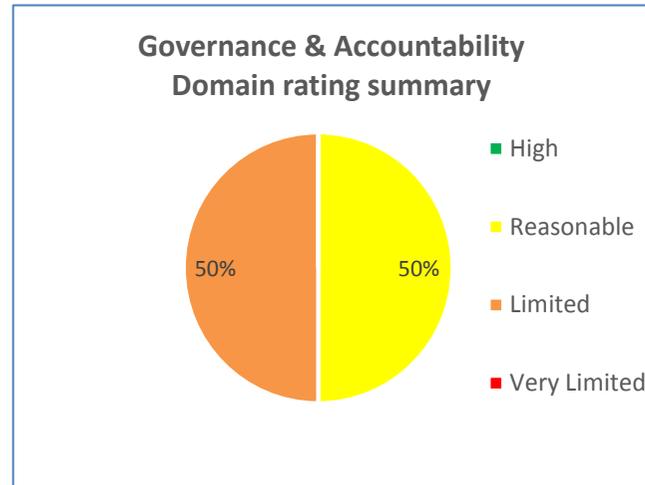
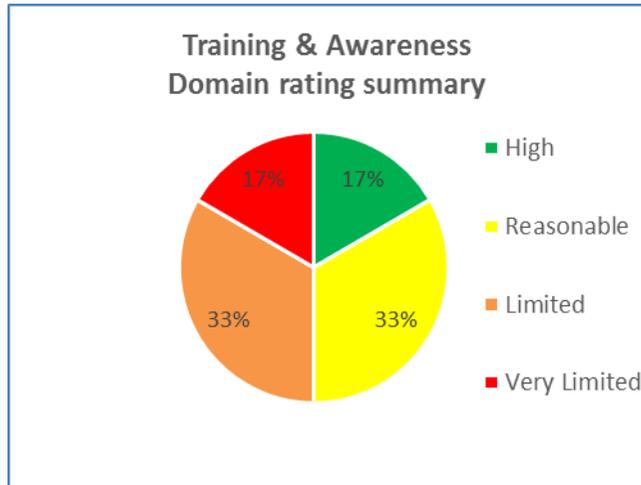
Audit Summary

| Audit Scope Area | Assurance Rating | Overall opinion |
|-----------------------------|------------------|---|
| Governance & Accountability | Limited | There is a limited level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified considerable scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation. |
| Training & Awareness | Reasonable | There is a reasonable level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified some scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation. |
| Data Sharing | Limited | There is a limited level of assurance that processes and procedures are in place and are delivering data protection compliance. The audit has identified considerable scope for improvement in existing arrangements to reduce the risk of non-compliance with data protection legislation. |

Priority Recommendations



Graphs and Charts



Good Practice

ELT have recently developed a number of new processes and oversight mechanisms, including establishing an IG steering group in the form of the Information Governance Strategy Group (IGSG). Once these newly developed processes are fully embedded they should enable a number of the recommendations in this report to be met.

Areas for Improvement

ELT should ensure that risks for all information assets are assessed, documented and supervised, ownership of records should be assigned an Information Asset Owner. ELT's information risk management process should be documented.

The data map should be expanded to include; the purposes of processing, the legal basis, whether data is transferred internationally or not and details of technical and organisational measures in place and safeguards.

A Data Protection Impact Assessment (DPIAs) process should be documented and implemented.

As intended, a programme of internal audits for each term should be formally established and documented. Routine compliance checks should be recorded and reported on.

Specialist training for key staff in areas such as information subject access requests (SARs), data sharing, and DPIAs and information risk should be rolled out.

Data sharing agreements should be put in place for all regular data sharing and these should be regularly reviewed and documented on a central log.

ELT should develop and implement a process to record data sharing decisions centrally ensuring an assessment is done of the legality of data sharing, including the necessary conditions of processing.

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rest with the management of ELT.

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of ELT. The scope areas and controls covered by the audit have been tailored to ELT and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.