

## Annual Data Statement for The Harmony Trust

This statement has been prepared by Illuminate Learning Ltd in line with the school's Data Protection Policy. It is an analysis of the last 12 months activity and covers the period from April 2018 to March 2019. This data is an amalgamation of the activities in all 12 of the Trust's academies.

Data Protection Officer					
Name	Colin Bellis				
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The Post Is	An In-house Appointment		Shared With Other Schools		External Provision
					✓

Headline Information			
Number of Staff Undertaken Data Protection Training	756	Number of Requests For Viewing Personal Data Held (Subject Access Requests)	5
Number of Data Related Incidents Referred to DPO By Academies	12	Number of Requests For Amendments Of Data Held	0
Number of Issues Referred to Information Commissioners Office	1	Number of Requests For the Removal Of Data From Records	0

Work Undertaken	
Policies Reviewed	Data Privacy Policy E-safety and Data Protection Retention of Documents
Improvements to Practice Undertaken	<ul style="list-style-type: none"> <li>- Visits to all academies by DPO</li> <li>- Regular surveys and audits</li> <li>- Over 20 pieces of guidance and advice produced for academies</li> <li>- Publications produced for all staff</li> </ul> <p>Guidance has included (but not limited to):</p> <ul style="list-style-type: none"> <li>○ CCTV and Data In Schools</li> <li>○ Induction for New Employees</li> </ul>

	<ul style="list-style-type: none"> <li>○ What is Confidential ?</li> <li>○ Statement of Expectation (For Use With Casual Contractors)</li> <li>○ Staff Privacy Statement</li> <li>○ Leavers Data Agreements</li> <li>○ Information for Students / Work Placements</li> <li>○ Encryption Guidance</li> <li>○ The Use of Images / Photographs</li> <li>○ SAR's : Frequently Asked Questions</li> <li>○ Data Breaches : Frequently Asked Questions</li> </ul>
<b>Training Undertaken / Provided</b>	We have provided Data Protection training for over 700 staff throughout the Trust. In addition, we have provided specific role training for SENCO's, Safeguarding Leads and Office Managers.
<b>Other Work</b>	DPO has worked with individual academies to review documentation held.

<b>Priorities for The Next Year</b>					
<b>Aspect</b>	<b>Objective</b>	<b>Who Is Involved ?</b>	<b>Timescale ?</b>	<b>Resources Required</b>	<b>Expected Outcomes</b>
Compliance	Ensure that training and guidance is effectively implemented in academies throughout the Trust, by providing 'academy specific' action plans.	DPO W May Principals	By August 2019	Meetings with each academy by DPO. Online survey tools.	Reduction in the number of data incidents by March 2020
Training	1. Review the impact and quality of training	DPO W May Principals	By December 2019	Surveys – plus introduction	Reductions in incidents.

	<p>2. Review training matrix expectations</p> <p>3. Identify ways to introduce GDPR training / support to workers not directly employed by The Trust</p>	Course Attendees		<p>of end of course evaluations.</p> <p>Discussions with Principals.</p>	Whole-staff understanding of the issues.
On-going Support	Continue to respond to issues within academies and provide relevant guidance to others.	DPO	On-going	As Necessary	Reductions in issues – especially those which are ‘familiar’
Documentation	Review all forms and documentation.	DPO W May	By August 2019	Time To Review and Produce Improved / Amended Versions	Improved communications, less confusion, clarity of expectations.