Firebird
Data Protection Consultancy

Education

UK GDPR Compliance Audit

Multi-Academy Trusts

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UK GDPR Compliance Audit Areas Assessed

Governance and Accountability

This area assesses whether the Trust as a whole (including its schools) has appropriate leadership, oversight and accountability arrangements in place for data protection. Controls focus on governance structures, policies, ICO registration, appointment of the Data Protection Officer (DPO), risk management processes (including DPIAs), records of processing activities, transparency documentation and senior leadership oversight of compliance activities.

Personnel Practices

These controls examine how data protection responsibilities are embedded within staff lifecycle processes. This includes contractual confidentiality obligations, recruitment and vetting checks, induction and annual training, ongoing awareness activity, incident reporting expectations, and secure processes when staff leave the organisation.

Data Subject’s Rights and Consent

This area assesses how effectively the Trust supports individuals’ rights under the UK GDPR. Controls cover awareness of rights, handling of subject access and other rights requests, use of documented procedures and templates, record-keeping, complaints handling, consent management (including withdrawal of consent), and safeguards around automated decision-making and profiling.

Records Management

Controls in this area focus on how personal data is created, stored, maintained and disposed of. This includes record-keeping standards, data accuracy, retention schedules, secure disposal processes, periodic reviews, and the Trust’s understanding of where personal data is held across physical and digital systems

UK GDPR Compliance Audit
Areas Assessed

Information Security

This area assesses the technical and organisational measures in place to protect personal data. Controls include information security policies, access controls, password management, encryption, physical security, remote working safeguards, breach management procedures, secure disposal of IT equipment, business continuity and resilience arrangements.

Supplier Due Diligence

These controls evaluate how the Trust manages third-party suppliers that process personal data on its behalf (data processors). This includes pre-contract due diligence, involvement of the Data Protection Officer in procurement, data processing agreements, maintenance of processor records, and lawful safeguards for international data transfers (eg using online learning platforms that store personal data outside the UK and EEA.

Third Party Data Sharing

This area looks at how the Trust shares personal data with external organisations (other data controllers). Controls assess clarity of data-sharing arrangements, staff guidance, approval processes for non-routine disclosures, record-keeping, and the use of secure methods when transferring data externally.

Use of Artificial Intelligence

This emerging area assesses the Trust's preparedness for the use of AI within school operations. Controls focus on governance, policy development, staff awareness and training, due diligence of AI tools, and alignment with data protection and Department for Education expectations, even where AI is not yet actively deployed.

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