



THE MINSTER NURSERY AND INFANT SCHOOL

SCHOOL OF INSPIRATION

DETERMINATION HONOUR BELIEVE

PREPARING FOR A BRIGHT FUTURE WITH INNOVATIVE AND EXCITING LEARNING

School Data Breach Procedure

Appendix J – School Data Breach Procedure & Form

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data but also the identification of poor preparation or prevention methods.

How do we report a breach?

The ICO personal data breach helpline can offer us advice about what to do after we have experienced a personal data breach 0303 123 1113 in the school.

In the first instance, a member of staff will report the concern to a member of the Senior Leadership Team, The Privacy Officer, The School Data Protection Officer or all, as soon as possible.

The Privacy Officer will decide in consultation with the DPO, how to contain and how to minimise the likelihood of a recurrence of the breach. In most cases we will arrange for all those whose data has been compromised to be informed. The ICO can help us with the strategy to deal with this.

Not all breaches need go to the ICO, a breach might be a loss of an encrypted stick with no significant data on it, for example. This will still be recorded and considered for changes in procedure to reduce likelihood of recurrence. This tracking information will be subject to inspection by our DPO.

The Privacy Officer will usually complete the internal Data Breach Report Form but this can be done by anyone. This will assist in communicating with the ICO and be a basis for our tracking and dealing with the issue.

Any member of staff can report a breach or call the helpline if in doubt. The ICO normal opening hours are Monday to Friday between 9am and 5pm. However, they are closed after 1pm on Wednesdays for staff training. When you call, they will record the breach and give you advice about what to do next.

The caller will be asked to provide the following information (please *use the next page to have this prepared*):

- what has happened;
- when and how you found out about the breach;
- the people that have been or may be affected by the breach;
- what is the school doing as a result of the breach; and
- contact person and number if the ICO needs more information
- who else has been told.

A copy of the information we provide will be sent to us.

Examples of Personal data breach that need to be sent to the ICO may include data being destroyed or sent to the wrong email or home address, the theft of a laptop or a hacking incident.

Data Breach Response

- **Complete data Breach Form below**
- Take to Senior Member of Staff or the Privacy Officer
- Ensure the data breach is no longer continuing
- Secure all data and systems
- Isolate and preserve compromised data
- Determine when the clock starts ticking for potential notification rule - 72 hours to tell the ICO
- Consider notifying law enforcement, if you suspect criminal activity
- If in doubt, contact ICO

If we have experienced a data breach in which people's personal information may be compromised we should report it to the ICO even if we are confident we have dealt with, and are continuing to deal with, the event appropriately. We can report a breach online if we are still investigating and will be providing more information at a later date, when we have established the full extent of the breach.

We must make sure we include the telephone number of someone familiar with the breach, in case we need to follow up with you about any of the information provided. If you are unsure about any of the questions with the online form, or if we have any concerns about how to manage the breach, we will call, **0303 123 1113**.

What has happened?

Step 2: When and how did we find out about it?

Step 3: Who has or may have been affected by the breach?

[Type a quote from the document or the summary of an interesting point. You can position the text box anywhere in the document. Use the Drawing Tools tab to change the formatting of the pull quote text box.]

Step 4: Is the School working to Data Breach Procedure? What has it done so far in this regard?

[Type a quote from the document or the summary of an interesting point. You can position the text box anywhere in the document. Use the Drawing Tools tab to change the formatting of the pull quote text box.]

Step 5: Main & Additional contact persons in school

Contact person:

Phone:

Contact person:

Phone:

Step 6: Who else has been told so far?

[Type a quote from the document or the summary of an interesting point. You can position the text box anywhere in the document. Use the Drawing Tools tab to change the formatting of the pull quote text box.]

Step 7: Reported / Recorded?

Reported to ICO?

Yes

Date & Time

No

If not/ why not? (can be decided that the problem has been dealt with and contained but must still be fully recorded)

Entered in Data Breach schedule?

Yes

No

This form completed by:

Date:/...../.....