Sutton Valence School

Little Lambs Nursery
littlelambsnursery.org.uk

Preparatory School
svs.org.uk

Data Breach Notification Policy and Procedure

This Policy applies to Sutton Valence School (including as the context requires, the Little Lambs Nursery, the Pre-Preparatory School, Preparatory School and Senior School).

1. Purpose

1.1. This policy and procedure establishes an effective, accountable and transparent framework for ensuring compliance with the requirements for handling and notifying breaches to the GDPR regulations at Sutton Valence School (SVS).

2. Policy Statement

2.1. Any staff member who suspects that a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data might have occurred, must immediately notify the Data Compliance Officer (DCO) and provide a description of the circumstances.

Notification of the incident can be made via email, by telephone, or in person.

2.2. The DCO will investigate all reported incidents to confirm whether or not a personal data breach has occurred. If a personal data breach is confirmed, the DCO will follow the data breach notification procedure based on the criticality and quantity of the personal data involved.

3. Notification Procedure

3.1. All personal data breaches must be reported immediately to the DCO who will record the information using the form at Appendix 1.

3.2. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the DCO must ensure that the data protection regulator is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

3.3. In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the DCO must ensure that all affected data subjects are informed of the breach directly and without undue delay.

3.4. Data breach notifications shall include the following information:

- The categories and approximate number of data subjects concerned;
- The categories and approximate number of personal data records concerned;
- The name and contact details of the DCO;
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by SVS to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

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Data Breach Reporting Template

1	Report Prepared by: Date: Organisation:	*Name:* *Date:* *Organisation:*
2	Summary of the event and circumstances	*When, what, who, summary of incident*
3	Type and amount of personal data	*Title or name of documents; what personal information was included?*
4	Notification to Data Protection Regulator	Yes ☐ No ☐
5	Notification to Data Subject	Yes ☐ No ☐ *If so, when, what advice was given, if not, why not?*
6	Has a complaint been received?	Yes ☐ No ☐
7	Actions taken by recipient when they inadvertently received the information	
8	Actions taken to retrieve the information and respond to the breach	*Has information been retrieved, when, what loss has been contained?*
9	Procedures/instructions in place to minimise risks to security of data	*Communication, secure storage*

10	Breach of policy/procedure by member of staff	*Has there been a breach of policy or instructions?*
11	Details of data protection training	*When were they last trained, what did it cover?*
12	Procedure changes to reduce risks of future data losses	*What needs to be done to prevent it happening again?*
13	Conclusion	