SUTTON VALENCE SCHOOL
SINCE 1576

Data Breach Notification Policy and Procedure

(Prep School and Senior School)

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This Policy applies to Sutton Valence School (including as the context requires, the Nursery, the Prep 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, online via GDPR Sentry 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 on GDPR Sentry.

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.