



**INSPIRING BELIEF
in God and one another**





**ST RICHARD'S
SCHOOL**

Our Vision:

To be a thriving and outstanding school where children and adults, working with the local community, have the opportunity to become the best they can be.

Inspiring belief...

- **in ourselves** – through progression and fulfilment
- **in each other** – through motivation and teamwork
- **in the children** – through showing them their potential
- **in the parents** – through building trust by results
- **in God to all** – through our whole lives

DATE APPROVED BY THE LAC	May 2019
REVIEW DATE	March 2021
Signed Headteacher	
Signed Chair of LAC	

**Data Protection Breach
Management Procedure**

Vision Statement

Our schools aspire to provide 'excellence and equity in a Christian context', where every child is valued as a unique individual treasured by a loving God. 'I have inscribed you on the palms of my hands.' Isaiah 49.v16.

Our aim is that every child will have the opportunity to flourish and develop into a rounded adult who can live life to the full. 'I have come that they may have life and may have it in all its fullness'. John 10.v10.

Our schools are places where all are welcome and where we practise kindness and hospitality on a daily basis.

Our vision and our values are clearly displayed and while it is not a requirement that a child and their family have to be practising Christians we do expect all parts of the community, children, staff, parents and carers to support the values that we hold dear.

In our school, we demonstrate how we support this vision through our values, which are Friendship, Endurance, Trust and Hope and summarised in the school's own vision statement:

Inspiring belief in God and in one another.

- **We believe in looking out for everyone**
We put safety first and we do all we can to ensure that all needs are met.
- **We believe in working together**
We act like a family who support and motivate one another.
- **We believe in aiming for the best**
We do all we can to ensure the highest quality in every area – our children deserve nothing less.
- **We believe in looking to the future**
We are positive and seek opportunities to grow and improve, overcoming obstacles to achieve our goals.

We live out our values and vision through our key policies e.g. The LAT Behaviour policy is supported through the values described in the rewards and sanctions section of the policy demonstrating the importance of dignity and forgiveness.

The school admissions policy decided by the Local Academy Committee shows our inclusivity and the importance we place on service to our local community.

The breadth of the curriculum and the creative projects which we enjoy are key to providing opportunities for children to experience life in 'all its fullness', so that alongside learning and wisdom they also experience joy and delight in learning. Care for the individual and their needs is crucial and the school's policies regarding inclusion and SEND are constant reminders that each of us is known to God and our names are 'inscribed on the palms of His hands'.

LAT HR policies are common in all schools and are created to ensure that individuals are treated fairly and with dignity. All HR policies have been scrutinised by the various unions to ensure that they contain acceptable procedures.

The following procedure has been based on the guidance on personal data breaches produced by the Information Commissioner's Office ('ICO').

1. On finding or causing a breach, or potential breach, the staff member or the data processor must immediately notify the LDBS Academies Trust and the LDBS Academies Trust 2's (herein collectively referred to as the 'LAT') Data Protection Officer ('DPO').
2. The DPO will investigate the report and determine whether a breach has occurred. In order to achieve this, the DPO will consider whether personal data has been accidentally or unlawfully (1) lost; (2) stolen; (3) destroyed; (4) altered; (5) disclosed or made available where it should not have been; or (6) made available to unauthorised people.
3. The DPO will alert the LAT's Chief Executive Officer ('CEO'), the (Executive) Headteacher of the relevant LAT School, and the Chair of the Local Academy Committee ('LAC').
4. The DPO will make all reasonable efforts to contain and minimise the impact of the breach and will be assisted by the relevant members of LAT staff or data processors where necessary. Actions relevant to specific data types are set out at the end of this procedure.
5. The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen.
6. The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms; cause physical harm to others; or result in material or non-material damage.

This can occur through (1) loss of control over their data; (2) discrimination; (3) identify theft or fraud; (4) unauthorised reversal of pseudonymisation (e.g. key coding); (5) damage to reputation; (6) loss of confidentiality; and (7) any other significant economic or social disadvantage to the individual(s) concerned.

If it's likely that there will be a risk to another person's rights and freedoms, the DPO must inform the ICO.

7. The DPO will document the decision, in the event that it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on a Breach Register (which will be maintained by each LAT school).

In the event that the DPO is required to inform the ICO, he or she will do so via the 'Report a Breach' page on the ICO website within 72 hours (<https://ico.org.uk/for-organisations/report-a-breach/>).

The DPO will set out (1) a description of the nature of the personal data breach including, where possible, the categories and an approximate number of individuals concerned and / or the categories and an approximate number of personal data records concerned; (2) the name and contact details of the DPO; (3) a description of the likely consequences of the personal data breach; (4) a description of the measures that have been taken, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned.

8. If all the above details are not yet known, the DPO will report as much as he / she is able to within 72 hours. The report will explain that (1) there is a delay; (2) the reasons why there is a delay; and (3) when the DPO expects to have further information.

The DPO will submit the remaining information as soon as possible.

9. The DPO will also assess the risk of the breach to the individual(s), again based on the severity and the likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached.

This notification will set out (1) the name and contact details of the DPO; (2) a description of the likely consequences of the personal data breach; and (3) a description of the measures that have been taken, or will be taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned.

10. The DPO will notify any relevant third parties who can help mitigate the loss to individuals (i.e. the police, the insurers, the banks or the credit card companies).

11. The DPO will document each breach, irrespective of whether it was reported to the ICO.

For each breach, the record will include the (1) facts and cause; (2) effects; and (3) the actions taken to contain it and ensure that it does not happen again (i.e. establishing a more robust processes or providing further training for individuals).

Records for all breaches will be stored on a Breach Register kept by each LAT school in both hard and soft copy.

12. The DPO will meet with the Executive (Headteacher) to review what happened and how it can be stopped from happening again. The meeting will happen as soon as reasonably possible.

Actions to minimise the impact of data breaches

The LAT will take the actions to mitigate the impact of different types of data breach, focusing especially on breaches involving particularly risky or sensitive information. The school will review the effectiveness of these actions and amend them as necessary after any data breach.

Such actions include, but are not limited to:

- Anonymising and minimising data;
- Encrypting drives;
- Secure access servers;
- Strong password setting;
- Training and support for staff governors; and
- Encrypted emails.