

Meadows School

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Data Protection Policy

	Contents	Page
1.	Introduction	1
2.	Aims	2
3.	The Data Controller	2
4.	Roles & Responsibilities	3
5.	Data Protection Principles	4
6.	Collecting Personal Data	4,5&6
7.	Sharing Personal Data	6
8.	Subject Access Requests& Other Rights of Individuals	7,8&9
9.	Parental Requests to See the Educational Records	9
10.	Biometric Recognition Systems	9
11.	CCTV	10
12.	Photographs & Videos	10
13.	Artificial Intelligence (AI)	11
14.	Data Protection by Design & Default	11
15.	Data Security & Storage of Records	12
16.	Disposal of Records	12
17.	Personal Data Breaches	13
18.	Training	13
19.	Monitoring Arrangements	13
20.	Additional Information	14&15

1. Introduction:

Meadows School is committed to Barnardo's Basis and Values, which provides the framework within which we can engage in giving young people a better start in life.

Information plays an important role in enabling Barnardo's to work with vulnerable children and young people, their parents and carers. In undertaking this work and in the course of carrying out its charitable objects, Barnardo's may collect, store and otherwise process Personal Data about its employees, volunteers, donors, supporters, service users, customers, business contacts, celebrities, politicians and other third parties.

Barnardo's Data Protection Policy Framework has been developed to assist Barnardo's in adopting good information practices, and satisfying data protection requirements and is used by Meadows School as the 'Overarching Policy' for its Data Protection.

2. Aims:	<p>Our school aims to ensure that all personal data collected about staff, students, parents and carers, governors, visitors and other individuals is collected, stored and processed in accordance with UK data protection law.</p> <p>This policy applies to all personal data, regardless of whether it is in paper or electronic format.</p>
3. The Data Controller:	<p>Barnardo's, through Meadows School, processes personal data relating to parents, students, staff, governors, visitors and others, and is therefore the data controller.</p> <p>Barnardo's is registered as data controller with the ICO as legally required.</p>

4. Roles and Responsibilities:

This policy applies to **all staff** employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

Barnardo's:

Barnardo's have overall responsibility for ensuring that our school complies with all relevant data protection obligations.

Barnardo's data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

The DPO is also the first point of contact for the ICO.

Full details of the DPO's responsibilities are set out in their job description.

Meadows Data Manager:

The Data Manager is the data protection lead in the school and acts as the representative of the data controller on a day-to-day basis.

The Data Manager is the first point of contact for individuals whose data the school processes.

All Staff:

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the Data Manager in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties

5. Data Protection Principles:	<p>The UK GDPR is based on data protection principles that our school must comply with.</p> <p>The principles say that personal data must be:</p> <ul style="list-style-type: none"> ➤ Processed lawfully, fairly and in a transparent manner ➤ Collected for specified, explicit and legitimate purposes ➤ Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed ➤ Accurate and, where necessary, kept up to date ➤ Kept for no longer than is necessary for the purposes for which it is processed ➤ Processed in a way that ensures it is appropriately secure <p>This policy sets out how the school aims to comply with these principles.</p>
6. Collecting Personal Data:	<p>Lawfulness, fairness and transparency:</p> <p>We will only process personal data where we have 1 of 6 'lawful bases' (legal reasons) to do so under data protection law:</p> <ul style="list-style-type: none"> ➤ The data needs to be processed so that the school can fulfil a contract with the individual, or the individual has asked the school to take specific steps before entering into a contract ➤ The data needs to be processed so that the school can comply with a legal obligation ➤ The data needs to be processed to ensure the vital interests of the individual or another person i.e. to protect someone's life ➤ The data needs to be processed so that the school, as a public authority, can perform a task in the public interest or exercise its official authority ➤ The data needs to be processed for the legitimate interests of the school (where the processing is not for any tasks the school performs as a public authority) or a third party, provided the individual's rights and freedoms are not overridden ➤ The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent

<p>6. Collecting Personal Data Continued:</p>	<p>For special categories of personal data, we will also meet 1 of the special category conditions for processing under data protection law:</p> <ul style="list-style-type: none"> ➤ The individual (or their parent/carer when appropriate in the case of a pupil) has given explicit consent ➤ The data needs to be processed to perform or exercise obligations or rights in relation to employment, social security or social protection law ➤ The data needs to be processed to ensure the vital interests of the individual or another person, where the individual is physically or legally incapable of giving consent ➤ The data has already been made manifestly public by the individual ➤ The data needs to be processed for the establishment, exercise or defence of legal claims ➤ The data needs to be processed for reasons of substantial public interest as defined in legislation ➤ The data needs to be processed for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law ➤ The data needs to be processed for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law ➤ The data needs to be processed for archiving purposes, scientific or historical research purposes, or statistical purposes, and the processing is in the public interest <p>For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:</p> <ul style="list-style-type: none"> ➤ The individual (or their parent/carer when appropriate in the case of a pupil) has given consent ➤ The data needs to be processed to ensure the vital interests of the individual or another person, where the individual is physically or legally incapable of giving consent ➤ The data has already been made manifestly public by the individual ➤ The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights ➤ The data needs to be processed for reasons of substantial public interest as defined in legislation <p>Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.</p> <p>We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect, or use personal data in ways which have unjustified adverse effects on them.</p>
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6.	Collecting Personal Data Continued:	<p>Limitation, minimisation and accuracy:</p> <p>We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.</p> <p>If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary. Staff must only process personal data where it is necessary in order to do their jobs.</p> <p>We will keep data accurate and, where necessary, up to date. Inaccurate data will be rectified or erased when appropriate. In addition, when staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Barnardo's record retention schedule.</p>
7.	Sharing Personal Data:	<p>We will not normally share personal data with anyone else without consent, but there are certain circumstances where we may be required to do so.</p> <p>These include, but are not limited to, situations where:</p> <ul style="list-style-type: none"> ➤ There is an issue with a student or parent/carer that puts the safety of our staff at risk ➤ We need to liaise with other agencies – we will seek consent as necessary before doing this ➤ Our suppliers or contractors need data to enable us to provide services to our staff and students – for example, IT companies. <p>When doing this, we will:</p> <ul style="list-style-type: none"> • Only appoint suppliers or contractors that can provide sufficient guarantees that they comply with UK data protection law • Establish a contract with the supplier or contractor to ensure the fair and lawful processing of any personal data we share • Only share data that the supplier or contractor needs to carry out their service <p>We will also share personal data with law enforcement and government bodies where we are legally required to do so. We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our students or staff.</p> <p>Where we transfer personal data internationally, we will do so in accordance with UK data protection law.</p>

8.	Subject Access Requests and Other Rights of Individuals:	<p>Subject access requests:</p> <p>Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:</p> <ul style="list-style-type: none"> ➤ Confirmation that their personal data is being processed ➤ Access to a copy of the data ➤ The purposes of the data processing ➤ The categories of personal data concerned ➤ Who the data has been, or will be, shared with ➤ How long the data will be stored for, or if this isn't possible, the criteria used to determine this period ➤ Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing ➤ The right to lodge a complaint with the ICO or another supervisory authority ➤ The source of the data, if not the individual ➤ Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual ➤ The safeguards provided if the data is being transferred internationally <p>Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:</p> <ul style="list-style-type: none"> ➤ Name of individual ➤ Correspondence address ➤ Contact number and email address ➤ Details of the information requested <p>If staff receive a subject access request in any form they must immediately forward it to the Data Manager.</p> <p>Children and subject access requests:</p> <p>Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.</p> <p>Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of students at our primary campus may be granted without the express permission of the pupil. This is not a rule and a student's ability to understand their rights will always be judged on a case-by-case basis.</p> <p>Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of students at our secondary site may not be granted without the express permission of the student. This is not a rule and a student's ability to understand their rights will always be judged on a case-by-case basis.</p>
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8.	Subject Access Requests and Other Rights of Individuals Continued:	<p>Responding to subject access requests</p> <p>When responding to requests, we:</p> <ul style="list-style-type: none"> ➤ May ask the individual to provide 2 forms of identification ➤ May contact the individual via phone to confirm the request was made ➤ Will respond without delay and within 1 month of receipt of the request (or receipt of the additional information needed to confirm identity, where relevant) ➤ Will provide the information free of charge ➤ May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary <p>We may not disclose information for a variety of reasons, such as if it:</p> <ul style="list-style-type: none"> ➤ Might cause serious harm to the physical or mental health of the student or another individual ➤ Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests ➤ Would include another person's personal data that we can't reasonably anonymise, and we don't have the other person's consent and it would be unreasonable to proceed without it ➤ Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts <p>If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee to cover administrative costs. We will take into account whether the request is repetitive in nature when making this decision.</p> <p>When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO or they can seek to enforce their subject access right through the courts.</p>
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8.	Subject Access Requests and Other Rights of Individuals Continued:	<p>Other data protection rights of the individual</p> <p>In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 6), individuals also have the right to:</p> <ul style="list-style-type: none"> ➤ Withdraw their consent to processing at any time ➤ Ask us to rectify, erase or restrict processing of their personal data (in certain circumstances) ➤ Prevent use of their personal data for direct marketing ➤ Object to processing that has been justified on the basis of public interest, official authority or legitimate interests ➤ Challenge decisions based solely on automated decision making or profiling (i.e. making decisions or evaluating certain things about an individual based on their personal data with no human involvement) ➤ Be notified of a data breach (in certain circumstances) ➤ Make a complaint to the ICO ➤ Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances) <p>Individuals should submit any request to exercise these rights to the Data Manager. If staff receive such a request, they must immediately forward it to the Data Manager.</p>
9.	Parental Requests to See the Educational Record:	<p>Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.</p> <p>If the request is for a copy of the educational record, the school may charge a fee to cover the cost of supplying it.</p> <p>This right applies as long as the pupil concerned is aged under 18.</p> <p>There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the student or another individual, or if it would mean releasing exam marks before they are officially announced.</p>
10.	Biometric Recognition Systems:	<p>Selected staff use iPads and/or smart phones as part of their role. These devices record biometric data in the form of finger prints and/or face recognition. Consent is obtained prior to first use. Laptops and desk phones are available for staff who object to the storage of their biometric data. Staff can withdraw consent at any time and will be provided with an alternative device to be able to carry out their work. Once a device is returned to the IT office it is cleared of all relevant data captured.</p>

11. CCTV:	<p>We use CCTV in various locations around the school site to ensure it remains safe. We will follow the ICO's guidance for the use of CCTV, and comply with data protection principles.</p> <p>We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.</p> <p>Any enquiries about the CCTV system should be directed to the Designated Safeguarding Lead</p>
12. Photographs & Videos:	<p>We obtain written consent from parents/carers, or students aged 18 and over, for photographs and videos to be taken of students for communication, marketing and promotional materials.</p> <p>Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parent/carer and the student. Where we don't need parental consent, we will clearly explain to the student how the photograph and/or video will be used.</p> <p>Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other students are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers (or students where appropriate) have agreed to this.</p> <p>Where the school takes photographs and videos, uses may include:</p> <ul style="list-style-type: none"> ➤ Within school on notice boards and in school magazines, brochures, newsletters, etc. ➤ Online on our school website <p>Consent will be sought for each individual image and can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.</p> <p>When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.</p>

13. Artificial Intelligence (AI):	<p>Artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard. Meadows School recognises that AI has many uses to help students learn, but also poses risks to sensitive and personal data.</p> <p>To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.</p> <p>If personal and/or sensitive data is entered into an unauthorised generative AI tool, Meadows School will treat this as a data breach, and will report it to Barnardo's One Trust accordingly.</p>
14. Data Protection by Design & Default:	<p>We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:</p> <ul style="list-style-type: none"> ➤ Appointing a suitably qualified Data Manager, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge ➤ Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 5) ➤ Completing data protection impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (Barnardo's DPO will advise on this process) ➤ Integrating data protection into internal documents including this policy, any related policies and privacy notices ➤ Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance ➤ Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant ➤ Appropriate safeguards being put in place if we transfer any personal data outside of the UK, where different data protection laws may apply ➤ Maintaining records of our processing activities, including: <ul style="list-style-type: none"> • For the benefit of data subjects, making available the name and contact details of our school and Data Manager, and all information we are required to share about how we use and process their personal data (via our privacy notices) • For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the UK and the safeguards for those, retention periods and how we are keeping the data secure

15.	Data Security & Storage of Records:	<p>We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.</p> <p>In particular:</p> <ul style="list-style-type: none"> ➤ Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data, are kept under lock and key when not in use ➤ Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, or left anywhere else where there is general access ➤ Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and students are reminded that they should not reuse passwords from other sites ➤ Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices ➤ Staff, students or governors who access and/or store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment (see our policy on acceptable use) ➤ Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 7)
16.	Disposal of Records:	<p>Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.</p> <p>For example, we will shred or incinerate paper-based records, and delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.</p>

17. Personal Data Breaches:	<p>The school will make all reasonable endeavours to ensure that there are no personal data breaches.</p> <p>In the unlikely event of a suspected data breach, we will follow the procedure set out in appendix 1.</p> <p>When appropriate, Barnardo's will report the data breach to the ICO within 72 hours after becoming aware of it. Such breaches in a school context may include, but are not limited to:</p> <ul style="list-style-type: none"> ➤ A non-anonymised dataset being published on the school website, which shows the exam results of students eligible for the pupil premium ➤ Safeguarding information being made available to an unauthorised person
18. Training:	<p>All staff and governors are provided with data protection training as part of their induction process.</p> <p>All staff are required to refresh their data protection training via Barnardo's B-Learning annually.</p> <p>Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.</p>
19. Monitoring Arrangements:	<p>The Data Manager is responsible for monitoring and reviewing this policy.</p> <p>This policy will be reviewed annually and approved by the Chair of Governors and Principal prior to publishing.</p>

20. Additional Information	
Copies of this policy may be obtained from:	<ul style="list-style-type: none"> • SharePoint
This policy links with the following policies & Documents	Barnardo's Data Protection Overarching Policy 'Your Data, Your Rights' - admission booklet Meadows School Surveillance and CCTV Policy. Safeguarding children policy (children's services) Inside Barnardo's Data Breach policy Acceptable Use Policy
Relevant statutory guidance, circulars, legislation & other sources of information are:	<p>This policy meets the requirements of the:</p> <ul style="list-style-type: none"> ➤ UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020 ➤ Data Protection Act 2018 (DPA 2018) <p>It also reflects the ICO's guidance for the use of surveillance cameras and personal information.</p> <p>In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.</p>
The lead member of staff is:	Data Manager

Definitions and key terms used in this policy:

TERM	DEFINITION
Personal data	Any information relating to an identified, or identifiable, living individual. This may include the individual's: <ul style="list-style-type: none"> ➤ Name (including initials) ➤ Identification number ➤ Location data ➤ Online identifier, such as a username It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
Special categories of personal data	Personal data which is more sensitive and so needs more protection, including information about an individual's: <ul style="list-style-type: none"> ➤ Racial or ethnic origin ➤ Political opinions ➤ Religious or philosophical beliefs ➤ Trade union membership ➤ Genetics ➤ Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes ➤ Health – physical or mental ➤ Sex life or sexual orientation
Processing	Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
Data subject	The identified or identifiable individual whose personal data is held or processed.
Data controller	A person or organisation that determines the purposes and the means of processing personal data.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Appendices:

Appendix 1 – Procedure for a Data Breach

Appendix 1 – Procedure for a Data Breach

This procedure is based on [guidance on personal data breaches](#) produced by the Information Commissioner's Office (ICO).

- On finding or causing a breach or potential breach, the staff member, governor or data processor must immediately notify the Data Manager via email.
- The Data Manager (with support from Barnardo's DPO) will investigate the report and determine whether a breach has occurred. To decide, the Data Manager will consider whether personal data has been accidentally or unlawfully:
 - Lost
 - Stolen
 - Destroyed
 - Altered
 - Disclosed or made available where it should not have been
 - Made available to unauthorised people
- Staff and governors will co-operate with the investigation (including allowing access to information and responding to questions). The investigation will not be treated as a disciplinary investigation
- If a breach has occurred or it is considered to be likely that is the case, the Data Manager will report the breach on Barnardo's One Trust and inform the Principal of their actions.
- The Data Manager will make all reasonable efforts to contain and minimise the impact of the breach. Relevant staff members or data processors should help the Data Manager with this where necessary, and the Data Manager should seek advice from Barnardo's DPO when required. (See the actions relevant to specific data types at the end of this procedure)
- Barnardo's DPO will assess the potential consequences (based on how serious they are and how likely they are to happen) before and after the implementation of steps to mitigate the consequences
- Barnardo's DPO will work out whether the breach must be reported to the ICO and the individuals affected using the ICO's [self-assessment tool](#)
- The Data Manager will document the decisions (either way), in case the decisions are challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored under Confidential to Senior Managers in the school SharePoint.
- Where the ICO must be notified, Barnardo's DPO will do this via the '[report a breach](#)' page of the ICO website, or through its breach report line (0303 123 1113), within 72 hours of the school's awareness of the breach. As required, the DPO will set out:
 - A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned
 - The categories and approximate number of personal data records concerned
 - The name and contact details of the DPO
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours of the school's awareness of the breach. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible

- Where the school is required to communicate with individuals whose personal data has been breached, the Data Manager will tell them in writing. This notification will set out:
 - A description, in clear and plain language, of the nature of the personal data breach
 - The name and contact details of the Data Manager
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The Principal will consider, in light of the investigation and any engagement with affected individuals, whether to notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The Data Manager will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored under Confidential to Senior Managers in the school SharePoint.
- The Data Manager and Principal will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible
- The Data Manager and Principal will meet termly to assess recorded data breaches and identify any trends or patterns requiring action by the school to reduce risks of future breaches