



WETHERBY HIGH SCHOOL

Data Protection Policy

This policy applies to staff, students, parents and Governors

Reviewing Committee: Full Governing Body

Approved by the Governing Body: May 2026

Next review date: May 2027

Executive Summary

This Data Protection Policy serves as a comprehensive framework for our school to ensure that all personal data handled within the school environment is managed in a manner that complies with all relevant data protection laws.

The school is committed to fostering a culture of data protection and privacy, recognising the importance of safeguarding personal information belonging to students, parents, staff, and other stakeholders. This policy outlines our approach to collecting, processing, storing, and sharing data, ensuring that rights and freedoms are respected.

This policy is an essential element of our commitment to creating a safe and secure environment for our school community. It is reviewed annually or as needed to accommodate changes in legislation or school operations.

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1. Aims

This Data Protection Policy outlines our commitment to maintaining the privacy and protection of personal data in accordance with the Data Protection Act (2018) and UK General Data Protection Regulation (GDPR) as amended by the Date (Use and Access) Act 2025 and relevant data protection legislation.

The policy is intended for:

- School Staff: All employees, including teaching and non-teaching staff, who handle personal data of students, parents, staff and other stakeholders
- School Leadership and Governors: Individuals responsible for overseeing and ensuring compliance with data protection practices
- Parents & Guardians: This policy provides essential information on how the school manages their children's personal data and outlines their rights regarding that data
- Third Party – Contractors: External organisations or individuals processing data on behalf of the school must understand their responsibilities under this policy.

We aim to ensure that all personal data collected about staff, students, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the UK data protection legislation (the UK General Data Protection Regulation and the Data Protection Act 2018). This policy covers all personal data, whether it is on paper or stored electronically.

2. Legislation and guidance

This policy meets our obligations under the:

[Data Protection Act 2018 \(DPA 2018\)](#)

[UK General Data Protection Regulation \(UK GDPR\)](#)

[Date \(Use and Access\) Act 2025 \(DUAA\)](#)

It is based on guidance published by the Information Commissioner's Office (ICO), which following the enactments of the DUAA will be replaced by the Information Commission, [UK GDPR](#) and guidance from the Department for Education (DfE) on [Generative artificial intelligence in education](#).

It also reflects the ICO's [guidance](#) for the use of surveillance cameras and personal information.

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.

3. Definitions

Term	Definition
<p>Personal data</p>	<p>Any information relating to an identified, or identifiable, living individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"> • Name (including initials) • Identification number • Location data • Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
<p>Special categories of personal data</p>	<p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <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
<p>Processing</p>	<p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.</p> <p>Processing can be automated or manual.</p>
<p>Data subject</p>	<p>The identified or identifiable individual whose personal data is held or processed.</p>

Data controller	A person or organisation that determines the purposes and the means of processing of 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.

4. The Data Controller

Our school processes personal data relating to parents, students, staff, Governors, visitors and others, and therefore is a Data Controller. This is called processing within the legislation. Wetherby High School is registered with the Information Commissioner’s Office (ICO) and will pay the required registration fee each year or as legally needed.

5. 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.

5.1 Governing Body

The Governing Body has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

5.2 Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing this policy, making sure we follow Data Protection laws, and creating related policies and guidelines as needed.

The DPO will submit an annual report on their work to the data protection lead in school who will share key points with the Governing Body as appropriate. They will also share any advice or recommendations on data protection issues when relevant.

The first point of contact for individuals whose data is processed by the school is the data protection lead. This is the Data and Assessment Manager. However, individuals may contact the DPO direct if the need arises. The DPO is first point of contact for the ICO.

Full details of the DPO’s responsibilities are set out in the Service Level Agreement.

Our DPO is Richard Lewis-Ogden and is contactable via email at DPO@bywaterkent.co.uk

The school is registered with the ICO (Information Commissioner’s Office) and has paid the required data protection fee.

5.3 Headteacher

The Headteacher has overall operational responsibility for day-to-day data privacy and control matters.

5.4 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 DPO 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're unsure whether they have legal permission to use personal data in a specific way.
 - If they need to seek consent, create a privacy notice, address data protection rights requested by an individual, or transfer personal data outside the UK
 - If there has been a data breach
 - Whenever they are commencing 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

6. Data protection principles

The UK GDPR is based on data protection principles that Wetherby High School is required to follow.

The principles say that personal data must be:

- 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

This policy sets out how Wetherby High School aims to comply with these principles.

7. Collecting personal data

7.1 Lawfulness, fairness and transparency

We will only process personal data where we have 1 of 6 'lawful bases' (legal reasons) to do so under data protection law:

- a) The individual (or their parent/carer when appropriate in the case of a student) has freely given clear consent
- b) 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
- c) The data needs to be processed so that the school can comply with a legal obligation
- d) The data needs to be processed to ensure the vital interests of the individual or another person i.e. to protect someone's life
- e) 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
- f) 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

And following the enactment of the Data (Use and Access) Act 2025 the addition of:

- g) processing is necessary for the purposes of a recognised legitimate interest

For special categories of personal data, we will also meet one of the special category conditions for processing under Data Protection Law:

- The individual (or their parent/carer when appropriate in the case of a student) 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

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- The individual (or their parent/carer when appropriate in the case of a student) 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

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by Data Protection Law.

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.

7.2 Limitation, minimisation and accuracy

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.

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.

We will keep data accurate and, where necessary, up to date. Inaccurate data will be rectified or erased when appropriate.

When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in line with the [Information and Records Management Society's toolkit for schools](#).

8. Sharing personal data

We will not normally share personal data with anyone else, but may do so in certain cases where:

- 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 first where appropriate.
- Our suppliers or contractors need data to enable us to provide services to our staff and students – for example, IT companies. In these cases we will:
 - Only appoint/hire suppliers or contractors that can prove they follow UK Data Protection laws
 - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a separate agreement, if we are sharing significant or sensitive data, to ensure data is handled fairly and legally
 - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us.

We will also share personal data with law enforcement and government bodies where we are legally required to do so.

In emergencies affecting our students or staff, we may share personal data with emergency services and local authorities to assist them in their response.

Where we transfer personal data internationally including to countries in the European Economic Area, we will do so in accordance with UK Data Protection laws.

9. Subject access requests and other rights of individuals

9.1 Subject access requests (SARs - also called Data Subject Access Requests or DSARs)

Individuals have the right to request access to personal information that the school holds about them.

This may include:

- Confirmation that their personal data is being processed.
- Access to a copy of the data.
- The reasons for data processing
- The types of data being processed
- Who the data is shared with
- How long the data will be kept, or how this period is decided
- The right to request changes, deletion, restrictions, or to object to data processing
- The right to file a complaint with the ICO or other relevant authority
- The source of the data if not provided by the individual
- Whether automated decision-making affects their data and what impact it may have
- Any protections in place if their data is shared internationally

Subject access requests can be submitted in any format, but we may be able to respond to requests more quickly if they are made in writing and include:

- Name/ Contact address/ Phone number and email
- Information being requested
- Reason for requesting the information (so that we locate and prioritise the datasets that will be of most value).

If staff receive a subject access request in any form, they must immediately notify their Line Manager and the Data and Assessment Manager.

9.2 Children and subject access requests

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 or have agreed to their request. Generally, children under 12 are considered too young to fully understand these rights, so most requests from parents for students' data may be granted without the child's direct permission. However, this is assessed on a case-by-case basis.

9.3 Responding to subject access requests

When responding to requests, we:

- May ask the individual to provide a form of identification (ID).
- May contact the individual via phone to confirm the request.
- Will respond within 1 month of receipt of the request or required ID
- Will provide the information at no cost.

- If the request is complex, we may take up to 3 months and will inform the individual within 1 month, explaining the need for extra time.

We may not provide information if it:

- Could seriously harm the physical or mental health of the student or another person
- Involves child abuse details where sharing would not be in the child's best interests
- Contains personal data about someone else that cannot be anonymised, and we do not have consent to share it
- Is part of certain sensitive documents like legal, crime, immigration, management, or exam-related records

The school will assess what constitutes reasonable and proportionate searches. Subsequently, the school will undertake the necessary actions to collate the appropriate personal data. Where clarification regarding the scope of a subject access request is required, or where the volume of information is too extensive to process, the school will contact the data subject to request additional details. The request will be placed on hold until the necessary clarification has been received.

If the request is manifestly excessive, manifestly unfounded, unreasonable or repeated, we may refuse or charge a fee to cover costs. If we refuse a request, we will explain why and inform the individual of their right to contact the ICO or to seek a legal resolution.

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The Data Protection Officer shall provide guidance and oversee the response ensuring that this is within the spirit of the principles of the UK GDPR and in accordance with the legislation.

9.4 Other Data Protection rights of the Individual

In addition to the right to make a subject access request (see above), individuals also have the right to:

- Withdraw their consent to processing at any time.
- Ask for correction, deletion, or limited processing of their data (in certain cases)
- Prevent use of their personal data for direct marketing.
- Object to data processing based on public interest or legitimate interests.
- Challenge decisions made by automated data processing with no human involvement.
- Be notified of a data breach in certain circumstances.
- Submit a complaint to the ICO.
- Request for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

Individuals can submit requests for these rights to the data protection lead or to the DPO. If staff receive such a request, they should forward it to the data protection lead who will consult the DPO.

10. Parental requests to see the Educational Record

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 student) for free within 15 school days of receipt of a written request.

If the request is for a copy of the educational record, the school can charge a fee to cover the cost of providing it.

This right applies as long as the pupil is under 18 years old and still in attendance at the school.

In certain situations, this right may be denied, such as if sharing the information could cause serious harm to the physical or mental health of the student or another person, or if it would release exam marks before they are officially published.

11. Biometric recognition systems

Students

Note that in the context of the Protection of Freedoms Act 2012, a "child" means a person under the age of 18.

Where we use students' biometric data as part of an automated biometric recognition system (for example, students use finger prints and/or facial recognition software to receive school dinners instead of paying with cash we will comply with the requirements of the [Protection of Freedoms Act 2012](#)).

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The school will get consent from at least one parent or carer before collecting or processing any biometric data from their child.

Parents/Carers and students can choose not to use the school's biometric system(s). We will provide alternative means of accessing the relevant services for those students.

By law, if a student does not want to use the biometric system or wants to stop using it, we will respect their choice and not process their data, even if we have consent from the parent or carer.

Staff

Where staff members or other adults use the school's biometric system(s), we will also obtain their consent before they first take part in it, and provide alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time, and the school will delete any relevant data already captured.

12. Artificial Intelligence (AI)

AI tools are now common and easy to use. Staff, students, and parents may be familiar with generative AI chatbots like ChatGPT and Copilot, the school understands that AI can help students learn, but it also has risks for personal and sensitive information.

To keep this information safe, no one is permitted to enter personal or sensitive data into unauthorised AI tools or chatbots. If anyone does enter such data into an unauthorised generative AI tool, the school will treat it as a data breach and will follow the procedures for handling personal data breaches outlined in Appendix 1.

13. CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We follow the ICO's guidelines on using CCTV and comply with data protection rules.

We don't need to get permission from individuals to use CCTV, but we make it clear where people are being recorded. Security cameras are easy to see, and there are clear signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to the Site Manager, Neil Hogan (nhogan@wetherbyhigh.co.uk).

14. Photographs and videos

As part of our school activities, we may take photos and videos of people in our school.

We will get written permission from parents or carers before taking photos or videos of their child for communication, marketing, and promotional use. We will clearly explain how the photos or videos will be used to both the parent or guardian and the student.

Any photos or videos taken by parents or guardians at school events for their own use are not covered by data protection laws. However, we will ask that those photos or videos, which include other students, are not shared publicly on social media for safety reasons, unless all relevant parents or guardians agree.

When Wetherby High School takes photos and videos, they may be used in ways such as:

- Inside the school, on notice boards, in school magazines, brochures, newsletters, Chronicle, WHTV etc.
- Outside of school by outside groups like the school photographer, newspapers, or campaigns
- Online on our school website or social media pages

Parents or guardians can refuse their permission or change their mind at any time. If consent is withdrawn, we will delete the photo or video and take reasonable steps not to share it further.

When we use photos and videos in this way, we will not include any other personal information about the child to keep them anonymous.

15. Data protection by design and default

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO, 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.

- Completing privacy 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 (the 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.
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant.
- Putting appropriate checks in place if we transfer any personal data outside the UK where no adequacy agreements are in place.
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of our school and DPO 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, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure.

16. Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or sharing, and protect it from accidental loss, destruction or damage.

In particular:

- 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 or in any place that is easily accessible.
- Where personal information needs to be taken off site, staff must ensure this is securely held and returned to school at the earliest opportunity
- Passwords should be robust, containing letters and numbers and used to access school computers, laptops and other electronic devices. Staff and students are reminded Staff not to reuse passwords from other sites
- Encryption software is used as appropriate to protect portable devices and removable media containing personal data, such as laptops and USB devices
- Staff, students or governors should not store personal information on their personal devices.
- 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.

17. Disposal of records

We will securely dispose of personal data that is no longer needed.

Personal data that is inaccurate or out of date will also be safely disposed of if it cannot be corrected or updated. For example, we will shred paper records and overwrite or delete electronic files. We may hire a third party to help dispose of records safely for the school. If we do this, we will ensure that the third party guarantees they follow data protection laws.

18. Personal data breaches

The school will do everything reasonable to prevent personal data breaches. If we suspect a data breach, we will follow the steps outlined in Appendix 1.

If we assess the breach to meet the threshold for reporting, we will report the breach to the Information Commissioner's Office (ICO) within 72 hours of finding out about it.

Examples of breaches in a school context may include, but are not limited to:

- A dataset that is not anonymous being posted on the school website, showing the exam results of students eligible for pupil premium
- Publishing a photo of a student or staff member without consent on school's social media
- Safeguarding information being shared with someone who is not allowed to see it
- The theft of a school laptop that has unencrypted personal data about students.
- A phishing attack where impersonating trusted entities through deceptive emails, messages, or websites to trick individuals into revealing sensitive information, such as passwords or financial details.
- A ransomware attack where malicious software that encrypts data, rendering it inaccessible, and demands payment (a ransom) for the decryption key, often with a threat of data exposure if payment isn't made.

19. Training

All new staff are provided with data protection training as part of their induction process. In line with the ICO's recommendation, refresher training will be provided to all staff regularly and not less than every 2 years, forming part of continuing professional development.

The Governing Body will take strategic responsibility to ensure that it has a good understanding of its duties and obligations.

20. Making and Handling Complaints about Personal Data

In accordance with Section 164a of the Data (Use and Access) Act 2025 schools are required to include information on how to raise a complaint relating to data protection, we have provide this information below:

How to Make a Data Protection Complaint

- **Your Right to Complain**
You have the right to make a complaint if you believe school have handled your personal data in a way that breaches the UK GDPR or Part 3 of the Data Protection Act.

- **How to Make a Complaint**

A complaint can be made using the template form in Appendix 2, this is also available directly from the school. Once complete, this should be submitted to the school at info@wetherbyhigh.co.uk.

- **Acknowledging a Complaint**

The school will acknowledge receipt of a complaint within **30 days**.

- **Responding to a Complaint**

Complaints will be investigated as quickly as possible and without undue delay, this will include taking the necessary steps to investigate and deal with any concerns.

- **Keeping You Informed**

As part of handling your complaint, we may make enquiries to better understand what has happened and keep you updated on the progress of our investigation. Once complete, you will be informed of the outcome.

- **Escalation to the ICO**

If a complaint is not resolved by the DPO, the data subject can escalate it to the Information Commissioner for further investigation.

21. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed annually and not less than every two years in accordance with the recommendations for statutory policies and will be presented to the full governing board for approval.

22. Links with other policies

This Data Protection Policy is linked to our:

- Acceptable use of ICT
- Freedom of Information Policy
- Staff Disciplinary Policy and Procedure
- Safeguarding and Child Protection Policy

Appendix 1: Personal data breach procedure

This procedure is based on [guidance on personal data breaches](#) produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the data protection lead person in the school/organisation, who will contact the DPO.
- The DPO will assist in the investigation of the report and determine whether a breach has occurred. To decide, the DPO 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
- The DPO will determine whether to alert the Headteacher/Chair of Governors.
- The DPO will assist in making all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will determine whether the breach meets the threshold to 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 using the ICO's self-assessment tool.
- The DPO will ensure that the decision is documented (either way); in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored on the school's computer system, or on a designated software solution.
- Where the ICO must be notified, the DPO will do this by telephone or via the ['report a breach' page of the ICO website](#) within 72 hours. 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. 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

- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact and ensure that any decision on whether to contact individuals is documented. If the risk is high, the DPO, or data protection lead will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out in plain language:
 - 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 data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will 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 protection lead person in school, with advice and/or support from the DPO 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 on the school's computer system, or on a designated software solution.

- In the case of a significant breach, the DPO, headteacher or designated senior leader will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible.

Actions to minimise the impact of data breaches

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

Sensitive information being disclosed via email (including safeguarding records)

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error
- Members of staff who receive personal data sent in error must alert the sender and the data protection lead person as soon as they become aware of the error
- If the sender is unavailable or cannot recall the email for any reason, the data protection lead will ask the ICT department to recall it

- In any cases where the recall is unsuccessful, the data protection lead will contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save or replicate it in any way.
- Written confirmation that the email has been deleted will be requested from all the individuals who received the data, confirming that they have complied with this request
- In the case of a serious breach, we will arrange for an internet search to be conducted to check that the information has not been made public; if it has, we will contact the publisher/website owner or administrator to request that the information is removed from their website and deleted

Other types of breach that you might want to consider could include:

- Details of student premium interventions for named children being published on the school website
- Non-anonymised student exam results or staff pay information being shared with governors
- A school laptop containing non-encrypted sensitive personal data being stolen or hacked
- The school's cashless payment provider being hacked and parents' financial details stolen
- Phishing attacks where email systems have been hacked to exfiltrate data
- Ransomware attacks where the organisation's IT systems have been compromised.

