Breach Management Flowchart

Personal Data Breach occurs → Breach reported in school to DPO, SBM or other. Breach form and log completed → Initial risk analysis – Head, DPO & key personnel

Is the breach likely to result in a risk to people's rights and freedoms?

Yes – then the breach should be reported by the DPO within 72 hours

No – the breach is not reportable

Agree breach action plan – depending on the scale and nature of the breach

Consider contacting the Data Subject(s) – mandatory – if there is a high risk to the rights and freedoms of individuals

Notify relevant Trustees and/Governors

Take action to recover the data, mitigate the loss, reduce the risks

Do any other external agencies need to be informed? Police, social care?

Begin any internal procedures, which may include disciplinary matters

Fulfil any communication and updating obligations or agreements with relevant parties, e.g. Data Subject (s) & ICO

Report outcomes → Identify operational needs → Implement strategies → Review impact of changes