



CROSFIELDS SCHOOL

Data Protection Policy

Person Responsible:

Bursar

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1. Aims

Crosfields School Trust Ltd and Crosfields School Enterprises Ltd, (our 'Group Companies') in this policy are referred to as "we", "us" or Crosfields School ("the School"). We aim to ensure that all personal data collected about staff, pupils, parents, governors, contractors, volunteers, visitors and other individuals is collected, stored and processed in accordance with current data protection legislation. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

This Notice applies to the whole School, including the EYFS.

2. Legislation and Guidance

This policy meets the requirements of the Data Protection Act 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#), the ICO's [code of practice for subject access requests](#) and [IT asset disposal for organisations](#).

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

3. Definitions

Term	Definition
Personal Data	Any information relating to an identified, or identifiable, individual. For example: <ul style="list-style-type: none">• Name (including initials) Home address, contact details• Pupil records• Photos and videos Personal data may exist as an electronic record and as a hard copy (paper or otherwise)
Special Categories of Personal Data	Personal data which is more sensitive and so needs more protection. For example: <ul style="list-style-type: none">• Religious beliefs• Ethnicity• Sexual orientation• Medical history• Special Educational Needs• Biometric data
Processing	Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying and sharing. 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 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.
Third Party	Any external organization with whom personal data is shared.

4. The Data Controller

The School processes personal data relating to parents, pupils, staff, governors, contractors, volunteers, visitors and others, and therefore is a Data Controller. The Bursar has responsibility as the Privacy Officer on behalf of the School.

5. Roles and Responsibilities

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

5.1 Governing Board

The Governing Board has overall responsibility for ensuring that the School complies with all relevant data protection obligations.

5.2 Primary Data Controller

The Privacy Officer is responsible for:

- Overseeing the implementation of this policy
- Informing and advising members of staff regarding their obligations to comply with UK GDPR and other related data protection legislation and guidance
- Monitoring our compliance with data protection law
- Developing related policies and guidelines where applicable
- Acting as the first point of contact for the ICO and for individuals whose data is being processed
- Coordinating a proactive and preventative approach to data protection.
- Calculating and evaluating the risks associated with the school's data processing.
- Having regard to the nature, scope, context, and purposes of all data processing.
- Prioritising and focussing on more risky activities, e.g. where special category data is being processed.
- Promoting a culture of privacy awareness throughout the school community.

- Carrying out ad hoc reviews of data practices to ensure staff understand and are acting in accordance with relevant data protection laws.

The Bursar fulfils this responsibility on a day-to-day basis.

5.3 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 Privacy Officer 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 wish to share personal data with third parties
- 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

6. Data Protection Principles

The School seeks to address (amongst other things) the following key regulatory principles within this policy:

- **Lawfulness, fairness and transparency** in the handling and use of personal data. The School will ensure that we make it clear how we are using personal data, on which “lawful bases” we are processing the information and that we recognise and uphold the rights of the Data Subjects.
- **Limiting the processing of personal data to specified, explicit, and legitimate purposes.** The School shall not use personal data for purposes that are “incompatible” with the purpose for which the data was originally collected.
- **Minimising the collection and storage of personal data** so that we only collect and retain what is adequate, relevant and limited for the intended purpose of processing.
- **Ensuring the accuracy** of personal data, and where necessary keeping it up to date, and enabling it to be erased or rectified without delay.
- **Limiting the storage of personal data.** The School will ensure that we retain personal data only as long as necessary to achieve the purposes for which it was collected.
- **Ensuring security, integrity, and confidentiality of personal data.** The School employs appropriate technical and organisational security measures to keep personal data secure.

7. Collecting Personal Data

7.1 Processing

The School processes information in order to fulfil our contractual obligations to provide educational services, safeguard and promote the welfare of its pupils, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

The School may process different types of information about staff, pupils, parents, governors, contractors, volunteers, visitors and other individuals for the purposes set out above. That information may include (but is not limited to):

- Personal details such as home address, contact details, date of birth and next of kin
- Identification documents
- Pupils' performance at School, including assessments, reports, examination reports, disciplinerecord, attendance information
- Special educational needs
- Medical records and information, including details of any illnesses, allergies or other medicalconditions suffered by a child
- Safeguarding information
- Details of any support received, including learning support, therapists, counselling, care plansand support providers
- Sensitive personal data such as religious beliefs
- Images of pupils and staff (and occasionally other individuals) engaging in School activities
- Bank details and National Insurance Number
- Performance Development Records
- CCTV images for security purposes

7.2 Lawfulness, Fairness and Transparency

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

- The data needs to be processed so that the School can **fulfil a contract** with the individual, or to enter 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 e.g. to protect someone's life
- The data needs to be processed for the **legitimate interests** of the School or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/guardian when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act (2018).

Whenever we initially collect personal data directly from individuals, we will provide them with therelevant information required by data protection law in the form of a Privacy Notice to

include:

- Notice that the personal data is being processed.
- Why the personal data is being processed.
- What the lawful basis is for that processing.
- Whether the personal data will be shared, and if so, with whom.
- The existence of the data subject's rights in relation to the processing of that personal data.
- The right of the data subject to raise a complaint with the ICO in relation to any processing.

The privacy notices supplied to individuals, including children, in regard to the processing of their personal data will be written in clear, plain, age-appropriate language which is concise, transparent, easily accessible and free of charge.

Personal data (including sensitive personal data, where appropriate) is processed by the School in order to:

- administer admissions
- support pupils' teaching and learning;
- monitor and report on pupil progress;
- provide appropriate pastoral care and safeguarding
- communicate with individuals with links to the School
- where appropriate, promote the School to prospective pupils (including through the School's prospectus, website and social media applications);
- other reasonable purposes relating to the operation of the School including to obtain appropriate professional advice and insurance for the School.
- carry out obligations under employment, social security or social protection law, or a collective agreement
- process payroll
- Support members of staff in respect of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis or the provision of health or social care
- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- support effective performance management inform our recruitment and retention policies
- allow better financial modelling and planning

7.3 Limitation, Minimisation and Accuracy

We will only collect personal data for specified, explicit and legitimate reasons. 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.

Staff must only process personal data where it is necessary in order to do their jobs. 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 School's Data Protection – Good Practice Guidelines.

7.4 Consent

Consent must be a positive indication expressly confirmed in words. It cannot be inferred from silence, inactivity, a positive action without words or pre-ticked boxes. Consent will only be accepted where it is

freely given, specific, informed and an unambiguous indication of the individual's wishes. Consent can be withdrawn by the individual at any time.

The school ensures that consent mechanisms meet the standards of the UK GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease.

Where the school opts to provide an online service directly to a child, the child is aged 13 or over, and the consent meets the requirements outlined above, the school obtains consent directly from that child; otherwise, consent is obtained from whoever holds parental responsibility for the child, except where the processing is related to preventative or counselling services offered directly to children. In all other instances with regards to obtaining consent, an appropriate age of consent is considered by the school on a case-by-case basis, taking into account the requirements outlined above.

8. Sharing Personal Data

During the course of our daily activities the School will frequently engage with third party organisations and may need to share personal data with them. A list of the third parties, with whom the School regularly shares data is available within Annex 1. The individuals concerned will be informed when the School shares personal data with third parties not on this list. The School will seek to ensure any third party upholds the principles of Data Protection as laid out in this document.

Personal data may be shared with a third party where:

- there is an issue with a pupil or parent/guardian that puts the safety of a pupil or our staff at risk
- we need to liaise with other agencies
- to enable the relevant authorities to monitor the School's performance i.e. Independent Schools Inspectorate;
- to compile statistical information (normally used on an anonymous basis);
- to safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical and dental) care for pupils;
- where specifically requested by pupils and/or their parents or guardians;
- to enable pupils to take part in national and other assessments and to monitor pupils' progress and educational needs;
- where necessary in connection with learning and extra-curricular activities undertaken by pupils e.g. educational visits, peripatetic teachers, residential trip providers, extra-curricular providers;
- to obtain appropriate professional advice
- where a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied;
- in support of our marketing activities;
- our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT support.
- the use by the School of online academic and educational services
- the use by the School of cloud IT services such as delivery of remote learning, email and file storage for staff and pupils

We will also share personal data with law enforcement and government bodies where we are legally

required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided
- See also Annex 3 with regard to Covid-19

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 pupils or staff.

We will only transfer personal data to a country or territory outside the European Economic Area if we are satisfied the third party(s) involved will only process the data in accordance with data protection law.

The school understands that the UK GDPR does not prevent or limit the sharing of information for the purposes of keeping children safe.

9. Subject Access Requests and Other Rights of Individuals

9.1. Subject Access Requests

Individuals have a right to make a 'Subject Access Request' to gain access to personal information that the School holds about them. This includes:

- 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
- 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

Subject Access Requests must be submitted in writing, either by letter or, email privacy@crossfields.com to the Privacy Officer. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

9.2. Children and Subject Access Requests

Personal data about a child belongs to that child, and not the child's parents or guardians. For a parent or guardian 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.

Children below the age of 13 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 guardians of pupils at the School may be granted without the express permission of the pupil. Children aged 13 and above may be mature enough to understand their rights and the implications of a Subject Access Request and therefore, a Subject Access Request from parents or guardians may require additional permission from the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.3. Responding to Subject Access Requests

When responding to requests, we:

- Will take appropriate steps to confirm the identity of the person making the request
- Will respond without delay and within 1 month of receipt of the request. Should the corresponding date on the following month fall on a weekend or public holiday, the final date will be the next working day.
- 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 and that they may seek redress with the Information Commissioner's Office if they feel this extension is not warranted

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

The school will ensure that information released in response to a Subject Access Request does not disclose personal data of another individual. If responding to the Subject Access Request in the usual way would disclose such data, the school will:

- Omit certain elements from the response if another individual's personal data would be disclosed otherwise.
- Reject requests that cannot be fulfilled without disclosing another individual's personal data, unless that individual consents or it is reasonable to comply without consent.
- Explain to the individual who made the Subject Access Request why their request could not be responded to in full.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to – the time limit for responding to the request will be paused until clarification from the individual is received.

9.4. Other Data Protection Rights of The Individual

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 7), individuals also have the right to:

- Request rectification of any data that is inaccurate or incomplete
- Have their personal data erased and to prevent further processing if:
 - It is no longer required for the purposes for which it was collected
 - Consent is withdrawn
 - There is an opposition to the processing and no superseding legitimate interest
 - The personal data is being unlawfully processed
 - The personal data must be removed in order to comply with a legal obligation
- Request a restriction of further processing of personal data
- Object to processing on specific grounds
- Obtain and reuse their personal data for their own purposes across different services.

Individuals should submit any request to exercise these rights to the Bursar. If staff receive such a request, they must immediately forward it to the Bursar.

Where it is not possible to comply with such requests, the data subject will be informed of the reason for this decision.

10. CCTV

We use CCTV in various locations around the School site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.

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.

Any enquiries about the CCTV system should be directed to the Estates Manager.

11. Photographs and Videos

As part of the School activities, we may take photographs and record images of individuals within the School.

We will obtain written consent from parents/guardians for photographs and videos to be taken of their child and from staff for communication, marketing and promotional materials on enrolment and at intervals not exceeding three years thereafter an annual basis.

Uses may include:

- Within School on notice boards and in School magazines, brochures, newsletters, etc.
- Outside of School by external agencies such as the School photographer, prospectus, newspapers, campaigns
- Online on the School website, intranet or social media pages including Facebook, Twitter, Instagram, Flickr.

Consent will be sought for each specific use and can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video from all locations and not distribute it further.

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, unless specific consent is provided.

See our Photography Policy for more information on our use of photographs and videos.

We may also record "Teams" sessions for safeguarding and record keeping purposes. These files will not be used for any promotional purposes and will be removed after 28 days.

12. Biometric Information

We may wish to use biometric information about members of staff, Senior School pupils and regular visitors as part of an automated biometric recognition system. Biometric information is information about a person's physical or behavioural characteristics that can be used to identify him / her. We will use fingerprints for security/access control and payment systems.

We will notify each parent of the pupil and obtain the written consent of at least one parent and the pupil (Senior School only) before we can use that pupil's biometric information. Members of staff and regular visitors will also have to provide written consent for the use of their biometric information. We will provide a separate biometric information notice.

The law places specific requirements on the School when it uses biometric information. For example:

- We cannot use the information for any purposes other than those described above;
- We must ensure that the information is stored securely;
- We must tell those people for whom we hold biometric information, what we intend to do with the information;
- We will not disclose the biometric information to a third party unless permitted by law. We may however share the information with Suprema Inc. and Kappture (Advanced IT Ltd) [• insert details of the supplier of the School's biometric system] for the proper use of the automated biometric recognition system.

13. 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:

- 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 6)
- Considering data protection issues as part of the design and implementation of systems, services and practices.

- Making data protection an essential component of the core functionality of processing systems and services.
- Automatically protecting personal data in school ICT systems.
- Implementing technical measures within the school network and ICT systems to ensure data is kept secure.
- Ensuring that documents are written in plain language so individuals can easily understand what is being done with personal data.
- 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
- Integrating data protection guidance and policy 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 records of attendance
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of the School 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

14. Data Protection Impact Assessments

DPIAs will be used in certain circumstances to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy. DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur. A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals, and will be used for more than one project, where necessary.

High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV or biometric data.

The school will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes
- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

15. Data Security and Storage of Records

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.

In particular:

- Paper-based records 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, pinned to notice/display boards, or left anywhere else where there is general access
- Passwords that are at least 8 characters long containing letters, special characters and numbers are used to access School computers and laptops. Staff are required to change their passwords on a termly basis.
- Personal information may only be stored on School devices or within an @crosfields.com Office 365 account. Staff and governors may access cloud-based services from their personal devices and are expected to follow the same security procedures as for School-owned equipment.
- Two Factor Authentication is in place for access to office 365 services and iSAMS.
- 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 8)

16. Disposal of Records

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. For example, we will shred paper-based records, and overwrite or delete electronic files. We have large secure bins to collect paper-based records for secure disposal by a third party on the School's behalf. We require the third party to provide sufficient guarantees that it complies with data protection law.

17. Personal Data Breaches

The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The Bursar will ensure that all staff members are made aware of, and understand, what constitutes a data breach as part of their training.

The School will make all reasonable endeavours to minimise the risk of personal data breaches. Where the school faces a data security incident, the Bursar will coordinate an effort to establish whether a personal data breach has occurred, assess the significance of any breach, and take prompt and appropriate steps to address it. We will follow the procedure set out in Annex 2. When appropriate, we will report the data breach to the ICO within 72 hours.

18. Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the School's processes make it necessary.

19. Monitoring Arrangements

This policy will be reviewed and updated every 2 years or sooner if legalisation or guidance changes.

20. Links with other policies

This data protection policy is linked to our:

Admissions Policy
Anti-Bullying & Pastoral Care Policy
Emergency Evacuation Policy
Safeguarding & Child Protection Policy
Data Protection – Good Practice Guide including Retention of Records
Equal Opportunities Policy
First Aid Policy
H&S Policy
Induction Policy
IT Network AUP Policy
Recruitment Policy
Registration Policy
Security Policy including CCTV
SEND Policy
Photography Policy

Annex 1: Third Party Data Processors

Following is a list of third-party companies and organisations with whom the School regularly shares personal data:

Active Learn
Ava Aware
BOFA
HSE
IAPS
ISA
Junior Language Challenge
Quizlet
SeeSaw
TES
Think Tank
UKVI
Aegon Limited
AIG
Andrew Clein Design
AR Reading
Assurity Consulting
Atlantic Data Ltd
AXA PPPHealthcare
Barclays Bank

Blooket
British Council
Bursary Administration Limited
Charity Commission

Collingwood Health
Companies House
Computershare
Crest Award
CST
Doddle
Dolia Design
Drop Box
Eden Road – check childcare voucher provider
EduCare (online training)
Educational Psychologist, Clinical Psychologist or any other external therapist or assessor to whom it is relevant
Evolve
External Assessors/professionals
Facebook
Flickr
Galore Park
GeoGuesrr.com
GL Assessment
Green Metro Taxi's
Hamilton
Haysmacintyre
HMRC
Idea Award
Insight
iSAMS
ISEB
ISI (sight of hardcopy during Inspection)
Kahoot
Kappture
Kerboodle
Lloyds Bank
Local NHS Immunization Team
Lucinda Ellis- Audiologist
Microsoft Office
MailChimp
Marsh
Mr Small
My Maths
Numbots
NHS Test & Trace
Planet Bofa: Bofa11plus.com

Pass
Paxton Net 2

Play Cricket
Primary Maths Challenge
Pro Judo for Competitions
Prudential
PurpleMash
PodPoint
Quizizz
Redwood Collections
Renaissance Learning
Residential Trip Providers
Routes into Languages
School Cloud
School Bus
Seneca
SOCS Co-Curricular
SOCS School Sports Provider
Soccially
Suprema
Teachers' Pension – Secure
Teaching Gadget
The Pensions Trust
Thomas Franks
Transfer school
TT Rockstars
Twinkle Resources
Twitter
uTalk (Languages Games 2021)
Vimeo
WCBS
Wokingham Borough Council

This list is correct as at December 2021 but is subject to change.

Annex 2: 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 Bursar
- The Bursar will investigate the report and determine whether a breach has occurred. To decide, the Bursar 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 Bursar will alert the Headmaster, the Chair of Governors and the Chair of the ICT Committee
- The Bursar will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary.
- The Bursar will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The Bursar will advise the Chair of Governors and Chair of the ICT Committee as to whether in her judgement, the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the Bursar will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
 - Loss of control over their data
 - Discrimination
 - Identify theft or fraud
 - Financial loss
 - Damage to reputation
 - Loss of confidentiality
 - Any other significant economic or social disadvantage to the individual(s) concerned

If it is likely that there will be a risk to people's rights and freedoms, the Bursar must notify the ICO.

- The Bursar will document the Governor's decision (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 Data Controller Log.
- Where the ICO must be notified, the Bursar will do this via the ['report a breach' page of the ICO website](#) within 72 hours. As required, the Bursar 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 Bursar
 - 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 Bursar 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 Bursar expects to have further information. The Bursar will submit the remaining information as soon as possible.
 - The Bursar will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the Bursar will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
 - The name and contact details of the Bursar
 - 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 Bursar 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 Bursar 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 Data Controller Log held on SharePoint.
 - The Bursar and Headmaster 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 all necessary and practicable actions 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.

Annex 3: Covid-19 (December 2021)

As lockdown eases and people start to get back to the usual pace of life, certain safeguards are being put in place to prevent the spread of the virus.

The School may assist the contact tracing scheme by collecting basic information about visitors and users of our facilities to enable the track and trace professionals to get in contact in the event of a positive COVID-19 diagnosis. We will also collect information from staff and pupils on their return to school regarding their health, travel and contact with COVID-19.

In summary:

- We may collect personal data from people on a voluntary basis when they visit School or use the Sports Facilities.
- We will use the personal data in a manner which is lawful, fair and transparent in respect of contacting individuals in the event of a positive COVID-19 diagnosis.
- We may share the information with track and trace authorities if required.
- We will not use the personal data for any other purposes (eg marketing).
- We will retain the data for a period of 28 days only.
- We will keep the information secure.