



Data Breach Policy

Overview

Global Education Oregon in London is aware of its obligations under the General Data Protection Regulation to process data lawfully and to ensure it is kept securely. We have procedures in place to ensure that data is not susceptible to loss or other misuse.

GDPR requires any personal data breach to be notified to the supervisory authority and in some cases to the affected individuals. This document sets out our data breach policy.

Global Education Oregon in London is registered with the Information Commissioner's Office (ICO) to process personal data and you can view the registration on the ICO's website under the [Data Protection Register](#).

Other data protection policies can be found here: <http://www.geolondon.org.uk/privacy-policies/>

Personal data breach

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or processed. A 'breach', for these purposes, is identifiable as a security incident which has affected the confidentiality, integrity or availability of personal data.

As indicated above, a data breach for these purposes is wider in scope than the loss of data. The following are examples of data breaches:

- access by an unauthorised third party
- deliberate or accidental action (or inaction) by a data controller or data processor
- sending personal data to an incorrect recipient
- computing devices containing personal data being lost or stolen
- alteration of personal data without permission
- loss of availability of personal data

Breach detection measures

We have implemented the following measures to assist us in detecting a personal data breach:

- Regular staff training
- Published policies and procedures for staff and students
- Regular reviews and risk assessments of the procedures and processes for collecting and storing personal data relating to staff and students

Notifiable breaches





For the purposes of this policy, a data breach will be notifiable when it is deemed by Global Education Oregon in London as likely to pose a risk to people's rights and freedoms. If it does not carry that risk, the breach is not subject to notification although it will be entered on the School's Data Breach Log.

A risk to people's freedoms can include physical, material or non-material damage such as discrimination, identity theft or fraud, financial loss and damage to reputation.

When assessing the likelihood of the risk to people's rights and freedoms, Global Education Oregon in London will consider:

- the type of breach
- the type of data involved including what it reveals about individuals
- how much data is involved
- the individuals involved e.g. how many are involved, how easy it is to identify them

Actions upon identification of breach

When Global Education Oregon in London is made aware of a breach, it will undertake an immediate investigation into what happened and what actions must be taken to restrict any consequences. A determination will be made at that point whether the breach is deemed a notifiable breach and whether it is deemed as resulting in a high risk to the rights and freedoms of individuals.

Timescales for notification to supervisory authority

Where a notifiable breach has occurred, Global Education Oregon in London will notify the ICO without undue delay and at the latest within 72 hours of it becoming aware of the breach. If notification is made beyond this timeline, Global Education Oregon in London will provide the ICO with reasons for this.

If it has not been possible to conduct a full investigation into the breach in order to give full details to the ICO within 72 hours, an initial notification of the breach will be made within 72 hours, giving as much detail as possible, together with reasons for incomplete notification and an estimated timescale for full notification. The initial notification will be followed up by further communication to the ICO to submit the remaining information.

Content of breach notification to the supervisory authority

The following information will be provided when a breach is notified:

- 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
- a description of the likely consequences of the personal data breach
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects





Timescales for notification to affected individuals

Where a notifiable breach has occurred which is deemed to have a high risk to the rights and freedoms of individuals, the School will notify the affected individuals themselves i.e. the individuals whose data is involved in the breach, in addition to the supervisory authority. This notification will be made without undue delay and may be made before the supervisory authority is notified. A high risk may be, for example, where there is an immediate threat of identity theft, or if special categories of data are disclosed online.

Content of breach notification to the affected individuals

The following information will be provided when a breach is notified to the affected individuals:

- a description of the nature of the breach
- the name and contact details of the data protection officer where more information can be obtained a description of the likely consequences of the personal data breach
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

Record of breaches

Global Education Oregon in London records all personal data breaches regardless of whether they are notifiable or not as part of its general accountability requirement under GDPR. It records the facts relating to the breach, its effects and the remedial action taken.

How to raise a query, concern or complaint

If after reading this page you still have queries, concerns or wish to raise a complaint you should contact:

Dr Amanda Milburn

Email: amanda@geolondon.org.uk

Tel: 020 7831 2760

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for investigation. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

www.ico.org.uk

The [Information Commissioner's Office](http://www.ico.org.uk) also provides useful advice and guidance on data protection.





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