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# Data Breach Policy

## 2021-2023

**Approved by:** Academic/Quality Assurance Board  
**Date of approval:** 30/05/2021  
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VERSION: 002



# Data Breach Policy

In the event of a data breach – which we define as any circumstance when data has or might have been removed or copied and/or taken from outside of our control – the following will occur

- A breach log (“Breach Log”) will be set up to record breaches
  - The first person to identify or suspect the breach will immediately inform the DPO (dpo@mrcollege.ac.uk)
  - The DPO will or will arrange to investigate and will assess as soon as possible whether there is a breach and if so what has been removed or otherwise breached and whether it could be considered as a breach posing a risk of harm to the Data Subject
  - Any breach involving losses of multiple sets of data will be considered as likely to pose a risk of harm
  - If there is no risk of harm to the Data Subject the DPO will:
    - Note the breach in the Breach Log
    - Take steps to ensure that it cannot happen again including where necessary providing additional training
  - If there is a risk of harm the DPO will:
    - Will ensure to have robust breach detection, investigation and internal reporting procedures in place.
    - Report to ICO and those affecting individuals within 72 hours using the template letter
    - Advise the relevant data subjects using the template letter
    - Note the breach in the Breach Log
    - Takes steps as above to ensure it cannot happen again
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- Take such other steps as are reasonably required
  - Comply with any requirements of the ICO