



Grange Farm Primary School

## Data Protection Policy

Adopted by Grange Farm Primary School Governing Body  
8th July 2025

To be reviewed by Governors Autumn 2026

## 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 pupils, parents, staff and other stakeholders. This policy outlines our approach to collecting, processing, storing and sharing data, ensuring that rights and freedoms are respected.
- **Key objectives of the policy:**
  - **Transparency:** we aim to communicate clearly how and why personal data is collected and used, ensuring that individuals are informed and can exercise their rights.
  - **Data Integrity and Security:** we implement robust security measures to protect personal information from unauthorised access, loss or misuse.
  - **Compliance:** we adhere to all legal and regulatory requirements related to data protection, including conducting regular audits and training staff on best practices.
  - **Rights of Individuals:** we empower pupils, parents and staff to understand their rights regarding their personal data, including the right to access, rectify and delete their information upon request.
- 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.

## CONTENTS

1. Aims
2. Legislation and guidance
3. Definitions
4. The data controller
5. Roles and responsibilities
6. Data protection principles
7. Collecting personal data
8. Sharing personal data
9. Subject access requests and other rights of individuals
10. Parental requests to see the educational record
11. Biometric recognition systems and Artificial intelligence
12. CCTV
13. Photographs and videos
14. Data protection by design and default
15. Data security and storage of records
16. Disposal of records
17. Personal data breaches
18. Training
19. Monitoring arrangements
20. Links with other policies
21. Appendix 1: Personal data breach procedure

## **1. Aims**

This Data Protection Policy outlines our commitment to maintaining the privacy and protection of personal data in accordance with the UK General Data Protection Regulation (GDPR) 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 pupils, parents, staff and other stakeholders.
- School leadership and governors: individuals responsible for overseeing and ensuring compliance with data protection practices.
- Parents and 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 make sure that all personal information about staff, pupils, parents, governors, visitors and others is collected, stored and used according to UK data protection laws (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:

UK General Data Protection Regulation (UK GDPR) - the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020

Data Protection Act 2018 (DPA 2018)

It is based on guidance published by the Information Commissioner's Office (ICO) on the 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><b>Personal data</b></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"> <li>● Name (including initials)</li> <li>● Identification number</li> <li>● Location data</li> <li>● Online identifier, such as a username</li> </ul> <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
<p><b>Special categories of personal data</b></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"> <li>● Racial or ethnic origin</li> <li>● Political opinions</li> <li>● Religious or philosophical beliefs</li> <li>● Trade union membership</li> <li>● Genetics</li> <li>● Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</li> <li>● Health – physical or mental</li> <li>● Sex life or sexual orientation</li> </ul>
<p><b>Processing</b></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>

<b>Data subject</b>	The identified or identifiable individual whose personal data is held or processed.
<b>Data controller</b>	A person or organisation that determines the purposes and the means of processing of personal data.
<b>Data processor</b>	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
<b>Personal data breach</b>	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 handles personal data about parents, pupils, staff governors, visitors and others which makes it a data controller. This is called processing within the legislation. The 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 school staff** and to any outside organisations or individuals working for the school. Staff who do not follow this policy may face disciplinary action.

##### **5.1 Governing board**

The governing board is responsible for ensuring that the school meets all data protection obligations.

##### **5.2 Data protection officer (DPO)**

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 with the governing board and 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 office manager. However, individuals may contact the DPO direct if the need arises. The DPO is the 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 to [dpo@bywaterkent.co.uk](mailto: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.
- Letting the school know about any changes to their personal information, like a new address.
- Contacting the DPO in the following cases:
  - If they have questions about how this policy works, data protection law, keeping data, or data security.
  - If they have any concerns that this policy is not being followed.
  - If they are unsure whether or not 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 someone has requested, or transfer personal data outside the UK.
  - If there has been a data breach
  - If they are starting a new activity that might impact an individual's privacy rights.
  - If they need help with any contracts or sharing personal data with outside parties

## **6. Data protection principles**

The UK GDPR is founded on data protection principles that our 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 the 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 one of six 'lawful bases' (legal reasons) to do so under data protection law:

- 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
- 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 so that the school, as a public authority, can perform a task **in the public interest**, or exercise its official authority
- 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
- The individual (or their parent/carer 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 under data protection law:

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

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 permission 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.

In addition, 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 record retention schedule.

## **8. Sharing personal data**

We usually don't share personal data with others, but may do so in certain cases, such as:

- If there is a concern with a pupil or parent/carer that could put staff safety at risk
- When we work with other agencies – we will ask for consent first if appropriate
- When our suppliers or contractors need data to help provide services to staff and pupils, like IT support. In these cases, we will:
  - Only hire suppliers or contractors that can prove they follow UK data protection laws
  - Set up a data sharing agreement, either in the contract or as a separate document, if we are sharing significant or sensitive data, to ensure data is handled fairly and legally
  - Only share the data the supplier or contractor needs to provide their service and necessary information to keep them safe

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

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

If we transfer personal data internationally, including to countries in the European Economic Area, we will follow UK data protection law.

## **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 a right to request access to personal information that the school holds about them. This may include:

- Confirmation that their data is being used
- 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 forward it to the data protection lead in school immediately.

### **9.2 Children and subject access requests**

A child's personal data belongs to the child, not to their parents or carers. For a parent or carer to make a request for a child's data, the child must either not understand their data rights or have agreed to the request.

Generally, children under 12 are considered too young to fully understand these rights, so most requests from parents for pupils' data must 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 we respond to requests:

- We may ask the individual for a form of identification
- We may contact them by phone to confirm the request
- We will respond within 1 month of receipt of the request or required identification
- We will provide the information at no cost
- If the request is complex, we may take up to three months and will inform the individual within one month, explaining the need for extra time

We may not provide information if it:

- Could Seriously harm the physical or mental health of the pupil 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
- I part of certain sensitive documents like legal, crime, immigration, management, or exam-related records

If the request is unreasonable or repeated, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs. If we refuse a request, we will tell the individual why, and tell them they have the right to contact the ICO or to seek a legal resolution.

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), individuals also have the right to:

- Withdraw their consent to data processing at any time
- Ask for correction, deletion or limited processing of their data
- 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 some cases)
- Submit a complaint to the ICO
- Request that their data be transferred to another party in a structured, common, and machine-readable format (in certain cases)

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 access to their child's educational record (which includes most information about a pupil) 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.

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 pupil or another person, or if it would release exam marks before they are officially published.

## **11. Biometric recognition systems**

### **Pupils**

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

If we use pupils' biometric data as part of an automated biometric recognition system (for example, pupils use fingerprints 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 written consent from at least one parent or carer before we take any biometric data from their child and first process it.

Parents/carers and pupils can choose not to use the school's biometric system(s). We will provide alternative ways for pupils to access these services if needed.

By law, if a pupil 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**

If staff members or other adults use the school's biometric system(s), we will also get their permission before they start using it, and we will offer alternatives if they prefer

not to participate. Staff and other adults can withdraw consent at any time, and the school will delete any related data already captured.

### **11.2 Artificial Intelligence (AI)**

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

## **12. 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 Site Manager.

## **13. 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 carer and the pupil.

Any photos or videos taken by parents or carers 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 pupils, are not shared publicly on social media for safety reasons, unless all relevant parents or carers agree.

When the school takes photos and videos, they may be used in ways such as:

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

Parents or carers 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.

## **14. 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 (see section 6)
- 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; we will also keep a record of attendance
- 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

## **15. Data security and storage of records**

We will keep personal data safe from unauthorised access, changes, processing, or sharing, and protect it from accidental loss, destruction, or damage. In particular: paper records and portable electronic devices, like laptops and hard drives with personal data, will be kept locked when not in use. Papers with confidential personal data should not be left on office or classroom desks, staffroom tables, or in any place that is easily accessible. If personal information needs to be taken off school grounds, staff must check it in and out at the school office. Where possible we will implement multi-factor authentication and strong passwords that are at least 10 characters long and include letters and numbers will be used to access school computers, laptops and other devices. Staff and pupils are reminded not to reuse passwords from other sites. We use encryption software to protect all portable devices and removable media, such as laptops and USB drives. Staff, pupils or governors who store personal information on their personal devices must follow the

same security rules as those for school equipment (see our online safety policy / ICT and internet acceptable use / ICT and communications policy). When we need to share personal data with a third party, we check that they will store it securely and take steps to protect it (see section 8).

## **16. 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.

## **17. Personal data breaches**

The school will do everything reasonable to prevent personal data breaches. If we suspect a data breach, we will follow the step 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 non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium
- Safeguarding information being made available to an unauthorised person
- The theft of a school laptop containing non-encrypted personal data about pupils

## **18. Training**

All new staff are provided with data protection training as part of their induction process. In line with the ICO 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 board will take strategic responsibility to ensure that it has a good understanding of its duties and obligations.

## **19. 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 [Department for Education's advice on statutory policies](#) and will be presented to the full governing board for approval.

## 20. Links with other policies

This data protection policy is linked to our:

- Freedom of information policy
- Staff professional code of conduct
- Safeguarding and Child Protection

### 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 Headteacher who will contact the DPO.
1. 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
  2. The DPO will determine whether to alert the chair of governors.
  3. 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)
  4. The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
  5. The DPO will work out whether the breach must 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, 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
    - Unauthorised reversal of pseudonymisation (for example, key-coding)
    - Damage to reputation

- Loss of confidentiality
- Any other significant economic or social disadvantage to the individual(s) concerned

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

6. 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.
7. Where the ICO must be notified, the DPO will do this 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
8. 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
9. 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
10. 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
11. 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.

- 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 DPO as soon as they become aware of the error
- If the sender is unavailable or cannot recall the email for any reason, the DPO will ask the ICT department to recall it
- In any cases where the recall is unsuccessful, the DPO 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
- The DPO will ensure we receive a written response from all the individuals who received the data, confirming that they have complied with this request
- The DPO will carry out an internet search 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 pupil premium interventions for named children being published on the school website
- Non-anonymised pupil 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