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| **DATA PROTECTION BREACH****RISK ASSESSMENT** | Preston Hedge’s Academy Trust |

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| **HAZARD** | **RISK****(WHAT HARM MIGHT BE CAUSED)** | **CONTROL MEASURES** | **RISK RATING AFTER CONTROL MEASURES** |
| Failure to notify the data subject of the processing of their information | Distress to the individual  | * Privacy Notices, Information Audit, Data Protection Policy (needs to be clear and concise)
* Effective publication 9of the above), using a range of media
* Statements informing individual of the legal basis for the collection and processing of information
* Clear expectations for the processing of data (including third party contracts)
* A DPO for advice and guidance
 | Low |
| The data subject being unaware of the disclosure of information to another organisation or person | Distress to the individual and/or other persons | * Staff training
* Privacy Notices, Information Audit, Data Protection Policy
* Effective publication of the above), using a range of media
* Statements informing individual of the legal basis for the collection and processing of information
* Clear expectations for the processing of data (including third party contracts)
* Effective process (e.g. double checks) to reduce the risk of disclosure in error
* Clear lines of responsibility for processing operations
 | Low |
| Disclosure in error by email or electronic transfer and storage of files | Distress to the individual and/or other personsReputational damage and fines  | * Minimise personal information transferred electronically between members of staff, governors etc.
* Secure storage with controlled access
* Encrypted files (password protected)
* Double checks in place when sending emails to mass audience (e.g. reply to all)
* Use of cloud based systems with password access, rather than locally stored devices
* Deleting data that is no longer relevant (and not legally justifiable)
* Contracts with third parties, specifying the length of time that data will be held
 | Low |
| Disclosure and loss of paper files | Distress to the individual and/or other personsReputational damage and fines   | * Reduce the amount of paper files held by using technology as an alternative method of storage.
* Where possible, upload paper files electronically, then shred
* Shred or secure disposal of personal data that is no longer relevant (and not legally justifiable)
* Files held in secure locations with controlled access
* Minimise the need for duplicated information
* Sign in and out system to know where and for how long information is located away from the school
* Where possible, transfer of pupil information electronically and securely
* Transfer of paper files securely (person to person, secure postal system)
 | Low |
| Loss or theft of physical devices or paper files | Distress to the individual and/or other personsReputational damage and fines  | * Staff training
* Minimise need for taking paper and devices away from the premises
* Ensure staff do not leave devices and paper files in cars
* Encrypt devices, and/or use secure cloud storage systems
* Do not use generic passwords
* Use electronic communication methods to parents i.e. data collection sheets
* If transferring data collection sheets by paper, ensure parents are aware of the procedure and date of transfer
* Where possible, transfer of pupil information electronically and securely
* Signing out (or in) procedure of pupil paper files
* Agreed protocols of disposal of personal information with third parties (e.g. for serious case reviews)
* Personal information can be identified (so as not to get mislaid with other non personal documents)
* Termination of employment meeting, signing of and hand over of equipment and personal information relating to the school community
 | Low |
| Unauthorised access  |  | * Individual passwords on photocopiers, computers, cloud access, email access, personal storage devices
* Employ IT specialist or company
* Encrypted software systems (to minimise hacking)
* Secure premises and signing in and out procedures
* Clear desk policy and devices that close a period of stay idle
* Staff training
* Awareness of visitor zones (like parents evening or performances) or not visitor access to offices where personal information is stored
* Limit access to electronic file that contain personal information
* Procedures in place to secure the site outside of the school day
* Procedure in place to ensure people no longer work for the school no longer have access to personal data.
* Minimise the use of personal emails
* Use email addresses attached to one individual (i.e. not family members)
* Ensure personal information is erased on equipment that has to be returned at the end of a contract (ensure the contract states that the contractor will erase the information, if the school does not have the expertise to do so).
 | Low |
| Off-Site Visits |  | * Use electronic systems (i.e. Plumsun app), rather than using paper information
* Where paper copies are issues, they should be signed out by individual members of staff and signed in at the end of the visit
 | Low |
| Future/ Potential Breaches |  | * Ensure a data impact assessment is completed for all new procedures or the purchase of new equipment
* Ensure a procedure is in place to ensure the request of information is being made by a legitimate source – real and authorised person who will receive the information (i.e. when a pupil becomes 13 years old, then the parent does not have the right to request their siblings information or a parent who has separated they may request information that they are not legally allowed access to – careful of requests for fishing!)
 | Low  |