

5 th October, 2009	Initial Issue	
16 th July, 2018	Review and update	

22nd September 2015

It is mandatory, under the requirements of the Data Protection Act 2018, to report a data protection breach if it is likely to result in a risk to people's rights and freedoms. A notifiable breach must be reported to the Information Commissioner's Office within 72 hours of the University becoming aware of it.

- Establish whether there is anything to be done to recover any losses and limit the damage the breach could cause;
- Where appropriate, inform the police

Before deciding on what further steps are necessary beyond those taken to immediately contain the breach the Data Protection Officer will consult with the Head of Legal Services and the University Secretary / Head of Governance Services, will, on behalf of the University, in consultation with the relevant Dean of College, Head of School and / or Director of Professional Service, undertake an initial assessment of the risks which may be associated with the breach.

As part of this assessment process consideration should be given to whether the incident requires notification to the Information Commissioner's office. In making this assessment the following factors will

If it is decided that the incident requires notification to the Information Commissioner's Office this should be done by the Data Protection Officer at the conclusion of this stage, and in any event within 72 hours of being notified of the breach.

The University acknowledges that it is important not only to investigate the causes of any breach but also to consider the effectiveness of the University's response.

In the event of a serious or repetitive breach, the Data Protection Officer will therefore convene an *Evaluation Group* with a core composition including:

- The Chair of the Compliance Task Group who will become Chair of the Evaluation Group
- The Head of Governance Services and / or the Head of Legal Services
- Relevant Dean of College, Head of Professional Service and / or Head of School determined by the nature of the breach
- Relevant operational managers determined by the nature of breach
- The Data Protection Officer

The Evaluation Group, in drawing together its conclusions, will take into account the following key issues, in relation to the data breach: