



Marden High School

Data Protection Policy

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1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents and carers, governors, visitors and other individuals is collected, stored and processed in accordance with UK data protection law.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and guidance

This policy meets the statutory requirements of UK data protection legislation and relevant educational regulations for maintained community secondary schools. It is based on:

- **UK General Data Protection Regulation (UK GDPR)** – incorporated into UK legislation by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020
- **Data Protection Act 2018 (DPA 2018)**
- **Data (Use and Access) Act 2025**
- **Regulation 5 of the Education (Pupil Information) (England) Regulations 2005**, which gives parents of pupils at maintained schools a statutory right of access to their child's educational record
- **ICO Guidance for Surveillance Cameras and Personal Information**, covering our operational use of Closed-Circuit Television (CCTV) across the school site
- Guidance published by the **Information Commissioner's Office (ICO)** on UK GDPR principles, subject access requests, and privacy by design
- Policy guidance paper published by the Department for Education (DfE) on **Generative Artificial Intelligence in Education** and statutory guidance under *Keeping Children Safe in Education (KCSIE)*

3. Definitions

Term	Definition
Personal data	Any information relating to an identified or identifiable living individual, directly or indirectly. This includes names, identification numbers, location data, online identifiers (e.g., Google Workspace usernames or IP addresses), or factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity.

Term	Definition
Special categories of personal data	<p>Personal data requiring higher levels of protection due to its sensitivity, including information regarding:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetics • Biometrics (where used for unique identification) • Health (physical or mental) • Sex life or sexual orientation
Processing	Any operation performed on personal data, whether automated or manual, including collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, erasure, or destruction.
Data subject	The identified or identifiable living individual whose personal data is processed (e.g., pupils, parents/carers, staff members, governors, visitors).
Data controller	The organisation or entity that determines the purposes and means of processing personal data. Marden High School is the Data Controller.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller. A data processor acts only on the instructions of the controller and does not determine the purposes or means of the processing.
Personal data breach	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 processes personal data relating to parents and carers, pupils, staff, governors, visitors and others. In carrying out these activities, the school acts as a data controller.

The school is registered with the Information Commissioner's Office (ICO) as a Data Controller and pays its data protection fee annually as required by law.

ICO Registration Number: Z6345416.

5. Roles and responsibilities

This policy applies to all staff employed by our school, and to external organisations or

individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

5.1 Governing Board

The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

5.2 Data Protection Officer (DPO)

The Data Protection Officer (DPO) oversees the implementation of this policy, monitors compliance, provides guidance, and serves as the primary contact point for data subjects and the ICO.

Marden High School accesses expert DPO services provided via North Tyneside Council Information Governance Service:

- **DPO Contact Email:** dpo.schools@northtyneside.gov.uk
- **Address:** Information Governance, Law and Governance, North Tyneside Council, Quadrant, The Silverlink North, Cobalt Business Park, NE27 0BY

5.3 Headteacher

The headteacher acts as the representative of the data controller on a day-to-day basis.

5.4 All Staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
 - If they have any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the UK
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties

6. Data protection principles

We adhere to the principles relating to processing of personal data set out in the UK GDPR, which requires personal data to be:

- Processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency);
- Collected for specified, explicit and legitimate purposes (purpose limitation);
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed (data minimisation);
- Accurate and, where necessary, kept up to date (accuracy);
- Kept for no longer than is necessary for the purposes for which it is processed (storage limitation);
- Processed in a way that ensures it is appropriately secure (security, integrity and confidentiality);
- Not transferred to another country without appropriate safeguards in place (transfer limitation); and
- Handled in a way that respects the rights of data subjects and allows them to exercise those rights (data subject rights and requests)

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (accountability).

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 1 of 6 '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 or another person i.e. 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 1 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 other 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
- For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:
 - The individual (or their parent/carer when appropriate in the case of a pupil) has given consent
 - 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 or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
 - The data needs to be processed for reasons of substantial public interest as defined in legislation

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 Data Minimisation, Purpose Limitation, 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 consent 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

Generally, we are not allowed to share personal data with third parties unless certain safeguards and contractual arrangements have been put in place.

There will be certain circumstances where we may be required to share personal data. These include, but are not limited to, situations where:

- There is an issue with a pupil, or a parent or carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
 - Only appoint suppliers or contractors that can provide sufficient guarantees that they comply with UK data protection law
 - Establish a contract with the supplier or contractor to ensure the fair and lawful processing of any personal data we share
 - Only share data that the supplier or contractor needs to carry out their service

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

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data internationally, we will do so in accordance with UK data protection law.

9. Subject access requests and other rights of individuals

9.1 Subject Access Requests (SARs)

By law, individuals have a right to make a 'subject access request' (SAR) to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed

- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for or, if this isn't possible, the criteria used to determine this period
- Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
- The safeguards provided if the data is being transferred internationally
- Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:
- The name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request in any form, they must immediately forward it to the DPO.

9.2 Children and Subject Access Requests (Secondary School Context)

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may not be granted without the express permission of the pupil. This is not a rule, and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.3 Responding to SARs

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request (or receipt of the additional information needed to confirm identity, where relevant)
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and

explain why the extension is necessary (these timeframes continue to apply when the school is closed during holidays)

- We may not disclose information for a variety of reasons, such as if it:
- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Would include another person's personal data that we can't reasonably anonymise, and we don't have the other person's consent and it would be unreasonable to proceed without it
- Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee to cover administrative costs. We will take into account whether the request is repetitive in nature when making this decision.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO or they can seek to enforce their subject access right through the courts.

9.4 Other Individual Rights

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:

- Withdraw their consent to processing at any time
- Receive certain information about the data controller's processing activities
- Ask us to rectify, erase or restrict processing of their personal data (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Object to processing that has been justified on the basis of public interest, official authority or legitimate interests
- Challenge decisions based solely on automated decision making or profiling (i.e. making decisions or evaluating certain things about an individual based on their personal data with no human involvement)
- Be notified of a personal data breach (in certain circumstances)
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

10. Parental requests to see the educational record

Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

If the request is for a copy of the educational record, the school may charge a fee to cover the cost of supplying it, however the fee must not exceed the cost of supply.

This right applies as long as the pupil concerned is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

11. CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will follow the [ICO's guidance](#) for the use of CCTV and comply with data protection principles.

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 office@mardenhigh.net.

12. Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents and carers, or pupils aged 18 and over, for photographs and videos to be taken of pupils for communication, marketing and promotional materials.

Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parents/carers and the pupil. Where we don't need parental consent, we will clearly explain to the pupil how the photograph and/or video will be used.

Any photographs and videos taken by parents and carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other pupils are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers (or pupils where appropriate) have agreed to this.

Where the school takes photographs and videos, uses may include:

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

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

13. Artificial intelligence (AI)

Artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini. Marden High School recognises that AI has many uses to help pupils learn, but also poses risks to sensitive and personal data.

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Marden High School will treat this as a data breach and will follow the personal data breach procedure outlined in appendix 1.

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 data protection impact assessments (DPIAs) 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

- Appropriate safeguards being put in place if we transfer any personal data outside of the UK, where different data protection laws may apply
- 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, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the UK and the safeguards for those, retention periods and how we are keeping the data secure

15. Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data, are kept under lock and key when not in use
- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, or left anywhere else where there is general access
- Where personal information needs to be taken off site, staff must sign it in and out from the school office
- Passwords made up of 4 random, unrelated words, or that are at least 10 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded that they should not reuse passwords from other sites
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8)

16. Disposal of records

Personal data is retained in alignment with the Information and Records Management Society (IRMS) Toolkit for Schools and North Tyneside Council record retention schedules. When records reach the end of their retention lifespan:

- Paper documents are placed in locked confidential waste containers and cross-shredded or destroyed securely on site.

- Electronic records, Google Workspace drives, CDs, USBs, and computer hardware are overwritten, sanitised, or safely decommissioned via certified ICT disposal contractors complying with UK GDPR standards.

17. Personal data breaches

The school will make all reasonable endeavours to ensure that there are no personal data breaches.

In the unlikely event of a suspected data breach, we will follow the procedure set out in appendix 1.

When appropriate, we will report the data breach to the ICO within 72 hours after becoming aware of it. Such 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

We will also notify the data subject where we are legally required to do so.

18. Complaints

Marden High School handles data protection complaints in accordance with statutory requirements under the Data (Use and Access) Act 2025 and ICO guidelines. Complaints should be submitted to the Headteacher (Mrs Karen Robson) or DPO (dpo.schools@northynteside.gov.uk).

Upon receipt of a complaint, the school will:

- Acknowledge receipt of the complaint within **30 days**.
- Investigate the matter thoroughly without undue delay, keeping the complainant informed of progress.
- Inform the complainant in writing of the outcome. Complainants retain the right to report concerns to the ICO (Helpline: 0303 123 1113 | Website: ico.org.uk).

19. Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

20. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed annually and approved by the full governing board.

21. Links with other policies

This data protection policy is linked to Marden High School's:

- Child Protection Policy
- Online Safety Policy
- ICT Acceptable Use Policy & Staff Code of Conduct
- Freedom of Information Policy
- Complaints - Guidance and Procedure

Appendix 1: Personal Data Breach Procedure

This procedure is based on guidance on personal data breaches produced by the Information Commissioner's Office (ICO).

- On finding or causing a breach or potential breach, the staff member, governor or data processor must immediately notify the data protection officer (DPO) by [insert your reporting procedure, e.g. using a dedicated email address, filling out a reporting form, etc.]
- The DPO will investigate 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
- Staff and governors will co-operate with the investigation (including allowing access to information and responding to questions). The investigation will not be treated as a disciplinary investigation
- If a breach has occurred or it is considered to be likely that is the case, the DPO will alert the headteacher and the chair of governors
- The DPO will make all reasonable efforts to contain and minimise the impact of the breach. Relevant staff members or data processors should help the DPO with this where necessary, and the DPO should take external advice when required (e.g. from IT providers). (See the actions relevant to specific data types at the end of this procedure)

- The DPO will assess the potential consequences (based on how serious they are and how likely they are to happen) before and after the implementation of steps to mitigate the consequences
- The DPO will work out whether the breach must be reported to the ICO, and the individuals affected using the ICO's self-assessment tool
- The DPO will document the decisions (either way), in case the decisions are challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored [set out where you keep records of these decisions – for example, on the school's computer system, or on a designated software solution]
- Where the ICO must be notified, the DPO will do this via the 'report a breach' page of the ICO website, or through its breach report line (0303 123 1113), within 72 hours of the school's awareness of the breach. 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
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours of the school's awareness of the breach. 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
- Where the school is required to communicate with individuals whose personal data has been breached, the DPO will tell them in writing. This notification will set out:
 - A description, in clear and plain language, of the nature of the personal data breach
 - 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
- The DPO will consider, in light of the investigation and any engagement with affected individuals, whether to notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- 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 [set out where you will keep these records – for example, on the school's computer system, or on a designated software solution]
- The DPO and headteacher will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible
- The DPO and headteacher will meet regularly [or insert how often] to assess recorded data breaches and identify any trends or patterns requiring action by the school to reduce risks of future breaches

Actions to minimise the impact of data breaches

Marden High School sets out below the specific steps we will take to mitigate the impact of different types of personal data breaches, focusing especially on breaches involving particularly sensitive, safeguarding, or special category information. We will review the effectiveness of these actions and amend them as necessary after any data security incident.

1. Sensitive or Safeguarding Information Disclosed via Email

- **Immediate Recall:** The sender must attempt to recall the email immediately upon becoming aware of the error. Staff members receiving an accidental transmission must immediately alert the sender and the Data Protection Officer (DPO) at dpo.schools@northtyneside.gov.uk.
- **ICT Provider Escalation:** If the sender cannot recall the email, the DPO or Headteacher (Mrs Karen Robson) will instruct ICT support for further investigation.
- **Written Deletion Confirmation:** Where recall is unconfirmed or unsuccessful, the DPO will contact the unintended recipient(s), explain the error, and request explicit written confirmation that the email and any attachments have been permanently deleted without being saved, copied, or shared.
- **Safeguarding Protocol:** If safeguarding records or child protection data are compromised, the DPO will immediately inform the Designated Safeguarding Lead (DSL) and discuss whether to notify North Tyneside Local Safeguarding Partners or social care services.
- **Public Exposure Check:** If misdirected data is published online, the DPO will contact ICT Support to remove it immediately.

2. Loss or Theft of Devices, Hardcopy Records, or Equipment Failure

- **Reporting & Remote Wipe:** Any lost or stolen school device (laptop, tablet, or portable storage) or equipment failure exposing personal data must be reported immediately to the Headteacher, DPO, and ICT support provider. The ICT provider will immediately issue remote wipe and account revocation commands.
- **Police Notification:** Device theft will be reported immediately to Northumbria Police to obtain a crime reference number.
- **Encryption Verification:** The DPO and ICT team will verify encryption protocols on the lost device to confirm whether the data remains protected from unauthorized access.

- **Physical Paper Security:** If paper records or confidential waste containers are stolen or lost off-site, staff must immediately notify the Headteacher and DPO to identify the affected data subjects and assess the risk level.

3. Non-Anonymised Sensitive Data Published on School Platforms

- **Immediate Removal:** If sensitive datasets (e.g., non-anonymised pupil exam results, free school meal/pupil premium data, or staff payroll information) are published accidentally on the school website or shared via public channels, the school must remove the material immediately.

4. Third-Party Supplier or Software Provider Data Breach

- **Vendor Verification:** If a breach occurs at an approved third-party processor (e.g., SIMS, CPOMS, ParentPay, or School Gateway), the DPO will liaise with the supplier to confirm containment, the scope of affected data, and remediation timelines.
- **Independent Risk Assessment:** The Headteacher and DPO will evaluate the vendor's report to determine whether Marden High School must notify affected parents, pupils, or the ICO independently.