

Purpose

This Data Breach Policy outlines the procedures to follow in the event of a data breach involving personal or sensitive information held by Peat Rigg Outdoor Centre (both Peat Rigg CIC and Peat Rigg Charitable Foundation) . It ensures compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, aiming to protect individuals' data and minimise risks

1. Scope

This policy applies to all employees, trustees, volunteers, contractors, and any third parties handling personal data on behalf of Peat Rigg Outdoor Centre. It covers all personal data, including but not limited to staff, visitors, clients, and service users.

2. Definition of a Data Breach

A data breach is defined as a security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. Examples include:

- Loss or theft of devices containing personal data.
- Unauthorised access to databases or systems.
- Human error, such as sending sensitive information to the wrong recipient.
- Cyberattacks, such as phishing or ransomware.

3. Responsibilities

- **Data Protection Officer (DPO):** Oversees the implementation of this policy and manages data breach responses.
- **All Staff and Volunteers:** Must report suspected breaches immediately and follow security protocols to protect personal data.

4. Reporting a Data Breach

1. **Immediate Reporting:** All data breaches must be reported immediately to the DPO or designated officer. Include details of the incident, affected data, and any immediate actions taken.
2. **Incident Logging:** The DPO will record the breach in the Data Breach Register, detailing:
 - Date and time of discovery.
 - Nature of the breach.
 - Individuals affected.
 - Actions taken.

5. Breach Assessment

The DPO will assess the breach to determine:

- **Nature and Scope:** Identify the type and volume of personal data involved.
- **Impact:** Assess the potential risk to individuals' rights and freedoms.
- **Severity:** Determine the likelihood of harm resulting from the breach.

6. Containment and Recovery

- Implement measures to stop the breach and prevent further unauthorized access.
- Recover lost or compromised data, where possible.
- Notify affected individuals promptly if their data has been compromised and provide advice on mitigating risks (e.g., changing passwords).

7. Notification of Regulatory Authorities

- If the breach poses a high risk to individuals' rights and freedoms, the Information Commissioner's Office (ICO) must be notified within 72 hours of discovery.
- The notification should include:
 - A description of the breach.
 - Likely consequences.
 - Measures taken or proposed to address the breach

8. Review and Prevention

- After managing a data breach, conduct a full review to:
 - Identify root causes.
 - Evaluate the effectiveness of the response.
 - Implement measures to reduce the risk of future breaches, such as staff training or technical upgrades.

9. Record Keeping

Maintain a detailed record of all breaches, regardless of whether they are reported to the ICO. This will demonstrate accountability and compliance with UK GDPR.

10. Training and Awareness

- All staff and volunteers will receive regular training on data protection and breach management.
- Training to cover the areas of:
 - Paper systems used by Peat Rigg; their use and disposal
 - Personal information about clients, staff, trustees and other stakeholders that is held on file, on google calendars and google documents and emails
 - Security at Peat Rigg and in particular access to the offices and electronic devices by unauthorised individuals

- Good practice when working with emails, all paper and electronic data systems, where personal and company data is involved

11. Policy Review

This policy will be reviewed annually or following a significant breach to ensure it remains effective and compliant with legal requirements.

Contact Information for Reporting a Breach:

- Data Protection Officer: Ian Thorpe
- Address: Peat Rigg Outdoor Centre, Cropton, Pickering. North Yorkshire YO18 8EX