

REPORTING WEAKNESSES, EVENTS & PERSONAL DATA BREACHES PROCEDURE

Document Control

Reference: GDPR-C DOC 16.1.2-3

Issue No: 1.7

Issue Date: 18 November 2022

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1. Scope¹

All users (whether Employees/Staff, contractors or temporary Employees/Staff and third-party users) and owners of Luminate Education Group information and personal data assets or systems are required to follow this procedure.

2. Responsibilities

- 2.1 Users and owners of organisational information and personal data assets are required to follow this procedure for reporting information security events, weaknesses and personal data breaches.
- 2.2 Information security events, weaknesses and personal data breaches are reported to the organisational GDPR Owner in line with this procedure.

3. Information Security Breaches Procedure *[ISO27002 Clauses 16.1.1, 16.1.3 and 18.2.3]*

- 3.1 Information security weaknesses and events are reported immediately after they are seen or experienced, on form [GDPR-C REC 16.1.2-3a](#)
- 3.2 The GDPR Owner reports back, by email, with a copy to the user's Manager/Executive, to describe how the event or breach was dealt with and closed out.
- 3.3 A copy of this e-mail is filed, together with the incident/weakness/event report, and any documentation arising from the event and the response to it that has been generated by following [GDPR-C DOC 16.1.5](#).

4. Personal Data Breaches Procedure [Articles 33 & 34 of EU GDPR]

- 4.1 In the case of a personal data breach, the GDPR Owner determines whether it requires the relevant statutory notifications under the EU GDPR in accordance with GDPR Breach Notification Procedure [GDPR DOC 2.5](#).

Document owner and approver

The Luminate Director of IT is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

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A current version of this document is available to all members of the LuminateEducation Group.

This procedure is issued on a version controlled basis.

Change History Record

Issue	Description of Change	Date of Policy
1.0	Initial issue	07/11/2017
1.1	Annual Review	01/11/2018
1.2	Annual Review – Responsibilities updated	08/12/2019
1.3	Annual Review – Luminate Education Group	23/10/2020
1.4	Annual Review – Privacy Notices updated	15/11/2021
1.5	Reviewed no changes	01/11/2022
1.6	Annual review	14/09/2023
1.7	Reviewed	23/10/2024