



# Personal Data Breach Policy

Version 2

*This policy has been implemented at Wingfield Academy after consultation with relevant recognised trade unions on behalf of Wingfield Academy following TUPE transfer to New Collaborative Learning Trust (NCLT).*

*Policy review will be carried out in consultation with recognised trade unions.*

**This policy applies to all NCLT institutions.**



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## **1.0 Introduction**

- 1.1 As an organisation that collects and uses personal data, the Trust takes seriously its obligations to keep personal data secure and to deal with security breaches relating to personal data when they arise. The Trust has therefore implemented this policy to ensure all Trust staff are aware of what a personal data breach is and how they should deal with it if it arises.
- 1.2 Trust staff will receive a copy of this policy when they start and may receive periodic revisions of this policy. This policy does not form part of any Trust staff's contract of employment and the Trust reserves the right to change this policy, following consultation with recognised trade unions. All Trust staff are obliged to comply with this policy at all times.
- 1.3 This policy applies to all Trust staff who collect and/or use personal data relating to individuals.
- 1.4 It applies to all personal data stored electronically, in paper form, or otherwise.

## **2.0 About this Policy**

- 2.1 This policy explains how the Trust complies with its obligations to recognise and deal with personal data breaches and (where necessary) to notify the ICO and the affected individuals. The Trust has a corresponding Data Breach Notification Procedure (see Appendix A) and Data Breach Register that set out how the Trust deals with and records personal data breaches.

## **3.0 Scope**

- 3.1 This policy applies to all Trust staff who collect and/or use personal data relating to individuals.
- 3.2 It applies to all personal data stored electronically, in paper form, or otherwise.

## **4.0 Definitions**

- 4.1 **Trust** – New Collaborative Learning Trust (NCLT).
- 4.2 **Trust staff** – Any Trust employee or contractor who has been authorised to access any of the Trust's personal data and will include employees, consultants, contractors, and temporary staff hired to work on behalf of the Trust.
- 4.3 **Data Protection Laws** – The UK General Data Protection Regulation and all applicable laws relating to the collection and use of personal data and privacy and any applicable codes of practice issued by a regulator including the Data Protection Act 2018.
- 4.4 **Data Protection Officer** – The Data Protection Officer can be contacted at: 01977 702139, or [data.protection@nclt.ac.uk](mailto:data.protection@nclt.ac.uk).

- 4.5 **ICO** – the Information Commissioner’s Office, the UK’s data protection regulator.
- 4.6 **Personal Data** – any information about an individual which identifies them or allows them to be identified in conjunction with other information that is held. Personal data is defined very broadly and covers both ordinary personal data from personal contact details and business contact details to special categories of personal data such as trade union membership, genetic data and religious beliefs. It also covers information that allows an individual to be identified indirectly for example an identification number, location data or an online identifier.
- 4.7 **Special Categories of Personal Data** - Personal data that reveals a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data (ie, information about their inherited or acquired genetic characteristics), biometric data (ie, information about their physical, physiological or behavioural characteristics such as facial images and fingerprints), physical or mental health, sexual life or sexual orientation and criminal record.

## **5.0 Personal Data Breach**

- 5.1 The Trust takes information security very seriously and the Trust has security measures against unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data. The Trust has in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.
- 5.2 Personal data breach is defined as any failure to keep personal data secure, which leads to the accidental or unlawful loss (including loss of access), destruction, alteration or unauthorised disclosure of personal data.
- 5.3 A personal data breach could include any of the following:
- loss or theft of personal data or equipment that stores personal data;
  - loss or theft of personal data or equipment that stores the Trust’s personal data from a Trust supplier;
  - inappropriate access controls meaning unauthorised Trust staff can access personal data;
  - any other unauthorised use of or access to personal data;
  - deleting personal data in error;
  - human error (which could be as simple as putting a letter in the wrong envelope or leaving a phone or laptop containing personal data on a train);
  - hacking attack; infection by ransom ware or any other intrusion on our systems/network;
  - ‘blagging’ offences where information is obtained by deceiving the organisation who holds it; or
  - destruction or damage to the integrity or accuracy of personal data.

A personal data breach can also include:

- equipment or system failure that causes personal data to be temporarily unavailable;
- unforeseen circumstances such as a fire, flood or power failure that causes personal data to be temporarily unavailable;
- inability to restore access to personal data, either on a temporary or permanent basis; or
- loss of a decryption key where personal data has been encrypted because this means the Trust cannot restore access to the personal data.

## **6.0 Reporting a Personal Data Breach**

- 6.1 Trust Staff must immediately notify any personal data breach to the Data Protection Officer, no matter how big or small and whether or not Trust staff think a breach has occurred or is likely to occur. This allows the Trust to contain the breach as soon as possible and to consider a recovery plan to minimise any risk of damage to the individuals affected and to the Trust.
- 6.2 If Trust staff discover a personal data breach outside working hours, Trust staff must notify it to the Trust's Data Protection Officer by email as soon as possible.
- 6.3 Trust staff may be notified by a third party (eg, a supplier that processes personal data on the Trust's behalf) that they have had a breach that affects personal data. Trust staff must notify this breach to the Trust's Data Protection Officer and the Trust's Data Breach Notification Procedure shall apply to the breach.

## **7.0 Managing a Personal Data Breach**

- 7.1 There are four elements to managing a personal data breach or a potential one and this policy considers each of these elements:
- Containment and recovery.
  - Assessment of on-going risk.
  - Notification.
  - Evaluation and response.
- 7.2 At all stages the Data Protection Officer, Trust Managers and senior leaders will consider whether the breach is within scope of the NCLT Incident Response Policy, and will consider whether to seek external legal advice.

## **8.0 Containment and Recovery**

- 8.1 An initial assessment of the personal data breach will be carried out, using the Data Breach Severity Tool in Appendix B.
- 8.2 If the personal data breach is unlikely to result in a risk to the rights and freedoms of the individuals affected then it will be added to the Trust's Data Breach Register and no further action will be taken.

8.3 If the personal data breach is likely to impact on the rights and freedoms of the individuals affected then the Trust will put together and implement a bespoke Personal Data Breach Plan to address the breach concerned in accordance with the Trust's Data Breach Notification Procedure. This will include consideration of:

8.3.1 whether there are any other people within the Trust who should be informed of the breach, such as IT team members, to ensure that the breach is contained;

8.3.2 what steps can be taken to contain the breach, recover the loss of any personal data or to prevent damage being caused; and

8.3.3 whether it is necessary to contact other third parties such as students, parents, banks, the ICO or the police particularly in the case of stolen personal data. All notifications shall be made by the Data Protection Officer.

8.4 All actions taken in relation to a personal data breach will be in accordance with the Data Breach Notification Procedure, which is maintained and administered by the Data Protection Officer (see Appendix A).

8.5 The Data Protection Officer is responsible for ensuring that the Data Breach Register is updated.

## **9.0 Assessment of Ongoing Risk**

9.1 As part of the Trust's response to a personal data breach, once the breach has been contained the Trust will consider the on-going risks to the Trust and to any other party caused by the breach and what remedial action can be taken to minimise the impact of the breach. This will be undertaken in accordance with the Trust's Data Breach Notification Procedure.

## **10.0 Notification**

10.1 Under Data Protection Laws, the Trust may have to notify the ICO and also possibly the individuals affected about the personal data breach.

10.2 Any notification will be made by the Data Protection Officer following the Trust's Data Breach Notification Procedure. The notification shall comply with the requirements of the ICO.

10.3 Notification of a personal data breach must be made to the ICO without undue delay and where feasible within 72 hours of when the Trust becomes aware of the breach unless it is unlikely to result in a risk to the rights and freedoms of individuals. It is therefore imperative that Trust staff notify all personal data breaches to the Trust in accordance with the Data Breach Notification Procedure immediately.

10.4 Notification of a Personal Data breach must be made to the individuals affected without undue delay where the breach is likely to result in a high risk to the rights and freedoms of individuals.

- 10.5 Not all personal data breaches are notifiable to the ICO and/or the individuals affected and the Trust will decide whether to notify and who to notify in accordance with the Data Breach Notification Procedure.
- 10.6 Where the personal data breach relates to a temporary loss of availability of the Trust's systems, the Trust does not have to notify if the lack of availability of personal data is unlikely to result in a risk to the rights and freedoms of individuals. The Trust does not consider that it has any systems where temporary unavailability would cause a risk to the rights and freedoms of individuals but this will be assessed on a case-by-case basis in accordance with the Data Breach Notification Procedure.
- 10.7 In the case of complex breaches, the Trust may need to carry out in-depth investigations. In these circumstances, the Trust will notify the ICO with the information that it has within 72 hours of awareness and will notify additional information in phases. Any delay in notifying the ICO must be seen as exceptional and shall be authorised in accordance with the Data Breach Notification Procedure.
- 10.8 Where a personal data breach has been notified to the ICO, any changes in circumstances or any relevant additional information which is discovered in relation to the personal data breach shall also be notified to the ICO in accordance with the Data Breach Notification Procedure.
- 10.9 When the Trust notifies the affected individuals, it will do so in clear and plain language and in a transparent way. Any notifications to individuals affected will be in accordance with the Data Breach Notification Procedure. Any notification to an individual should include details of the action the Trust has taken in relation to containing the breach and protecting the individual. It should also give any advice about what they can do to protect themselves from adverse consequences arising from the breach.
- 10.10 The Trust may not be required to notify the affected individuals in certain circumstances as exemptions apply. Any decision whether to notify the individuals shall be done in accordance with the Data Breach Notification Procedure and shall be made by the Data Protection Officer.

## **11.0 Evaluation and Response**

- 11.1 It is important not only to investigate the causes of the breach but to document the breach and evaluate the effectiveness of the Trust's response to it and the remedial action taken.
- 11.2 There will be an evaluation after any breach of the causes of the breach and the effectiveness of the Trust's response to it. All such investigations shall be carried out in accordance with the Data Breach Notification Procedure and will be recorded on the Personal Data Breach Register.
- 11.3 Any remedial action such as changes to the Trust's systems, policies or procedures will be implemented in accordance with the Data Breach Notification Procedure.

## Appendix A

### Data Protection Notification Procedure

#### **IDENTIFYING AND REPORTING A DATA BREACH**

If you discover a data breach, however big or small, you must report this to our Data Protection Officer immediately.

**The Data Protection Officer can be contacted at: 01977 702139, [data.protection@nclt.ac.uk](mailto:data.protection@nclt.ac.uk).**

Any other questions about the operation of this procedure or any concerns that the procedure has not been followed should be referred in the first instance to the Data Protection Officer.

A data breach could be as simple as you putting a letter in the wrong envelope and therefore even the most minor data breaches **must** be reported.

False alarms or even breaches that do not cause any harm to individuals or to the Trust should nevertheless be reported as it will enable us to learn lessons in how we respond and the remedial action we put in place.

We have a legal obligation to keep a register of all data breaches, no matter how big or small and no matter whether any harm was caused.



#### **BECOMING AWARE OF A DATA BREACH – INVESTIGATING**

We become aware of a data breach when we have a reasonable degree of certainty that a security incident has occurred that has led to personal data being compromised. From this point, our time limit for notification to the ICO will commence.

When you report a data breach to our Data Protection Officer, our Data Protection Officer will promptly investigate the breach to ascertain whether we are fully aware that a breach has occurred that has led to personal data being compromised.

**THIS WILL BE DONE WITHIN 24 HOURS OF A BREACH BEING REPORTED TO US.**



#### **ASSESSING A DATA BREACH**

Once you have reported a breach and our Data Protection Officer has investigated it and has decided that we are aware that a breach has occurred, our Data Protection Officer will log the breach in our Data Breach Register and will carry out an initial assessment of the breach to evaluate its severity.

Once the level of severity is known, our Data Protection Officer will notify management. Where necessary, the Trust may need to follow the **Trust's Disaster Recovery Plan**.

We will then investigate the breach and consider any on-going risks to the Trust and any individuals affected.

If our Data Protection Officer and management consider that the breach is very serious, they will consider the impact on our reputation and the effect it may have on the trust placed in us. Our Data Protection Officer and senior management will consider whether to appoint a PR professional to advise on reputational damage and will also consider whether legal advice is needed.

**THIS WILL BE DONE WITHIN 24 HOURS OF US BECOMING AWARE OF THE BREACH.**





### **FORMULATING A RECOVERY PLAN**

Our Data Protection Officer and senior management will investigate the breach and consider a recovery plan to minimise the risk to individuals. As part of the recovery plan, our Data Protection Officer and senior management may interview any key individuals involved in the breach to determine how the breach occurred and what actions have been taken.

**THIS WILL BE DONE WITHIN 24 HOURS OF ASSESSING THE BREACH.**



### **NOTIFYING A DATA BREACH TO THE ICO**

Unless the breach is unlikely to result in a risk to the rights and freedoms of individuals, we must notify the breach to the ICO within 72 hours of becoming aware of the breach. We must also notify the individuals concerned as soon as possible where the breach is likely to result in a high risk to their rights and freedoms.

The content of the notification will be drafted by our Data Protection Officer in line with our Data Breach Policy, and the notification will be made by our Data Protection Officer – please be aware that **under no circumstances must you try and deal with a data breach yourself.**

**THIS WILL BE DONE WITHIN 72 HOURS OF BECOMING AWARE OF THE BREACH.**



### **NOTIFYING A DATA BREACH TO INDIVIDUALS**

We must also notify the individuals concerned as soon as possible where the breach is likely to result in a high risk to their rights and freedoms.

The content of the notification will be drafted by our Data Protection Officer in line with our Data Breach Policy and in conjunction with consulting the ICO if considered necessary. We will notify individuals in clear and plain language and in a transparent manner (for example by email, SMS or letter). **Please be aware that under no circumstances must you try and deal with a data breach yourself.**

In some circumstances, explained in our Data Breach Policy, we may not need to notify the affected individuals. Our Data Protection Officer will decide whether this is the case.

**THIS WILL BE DONE AS SOON AS POSSIBLE AFTER WE BECOME AWARE OF THE BREACH.**



### **NOTIFYING A DATA BREACH TO OTHER RELEVANT THIRD PARTIES**

We may also consider that it is necessary to notify other third parties about the data breach depending on the nature of the breach. This could include:

- Insurers
- Police
- Employees
- Parents/Guardians
- Sponsors
- Banks
- Contract counterparties

The decision as to whether any third parties need to be notified will be made by our Data Protection Officer and management. They will decide on the content of such notifications.

**THIS WILL BE DONE WITHIN 5 DAYS OF BECOMING AWARE OF A DATA BREACH.**



#### **CONSIDER WHETHER NOTIFICATIONS NEED TO BE UPDATED**

We need to keep the ICO up to date about the data breach. If anything changes from the time we send the initial notification to the ICO, our Data Protection Officer will consider whether we need to update the ICO about the data breach.

**THIS WILL BE CONSIDERED ON AN ONGOING BASIS.**



#### **EVALUATION AND RESPONSE**

The key to preventing further incidents is to ensure that the Trust learns from previous incidents.

It is extremely important to identify the actions that the Trust needs to take to prevent a recurrence of the incident. Our Data Protection Officer and management will carry out an evaluation as to the effectiveness of our response to the data breach and document this in our Data Breach Register.

## Appendix B

### Data Breach Severity Tool

<https://www.enisa.europa.eu/publications/dbn-severity>

Severity (SE)

Data Processing Context (DPC)

Ease of Identification (EI)

Circumstances of Breach (CB)

$$SE = DPC \times EI + CB$$

Severity of a Data Breach		
$SE < 2$	<b>Low</b>	Individuals either will not be affected or may encounter a few inconveniences, which they will overcome without any problem (time spent re-entering information, annoyances, irritations, etc.)
<b>REPORTABLE</b>		
$2 \leq SE < 3$	<b>Medium</b>	Individuals may encounter significant inconveniences, which they will be able to overcome despite a few difficulties (extra costs, denial of access to business services, fear, lack of understanding, stress, minor physical ailments, etc.).
$3 \leq SE < 4$	<b>High</b>	Individuals may encounter significant consequences, which they should be able to overcome albeit with serious difficulties (misappropriation of funds, blacklisting by banks, property damage, loss of employment, subpoena, worsening of health, etc.)
$4 \leq SE$	<b>Very high</b>	Individuals may encounter significant, or even irreversible, consequences, which they may not overcome (financial distress such as substantial debt or inability to work, long-term psychological or physical ailments, death, etc.).

## Data Processing Context (DPC) Scoring

Table 1: Data Processing Context (DPC)		Score
<b>Simple data</b>	Eg. biographical data, contact details, full name, data on education, family life, professional experience, etc.	
	<b>Preliminary basic score:</b> when the breach involves "simple data" and the controller is not aware of any aggravating factors.	<b>1</b>
	The DPC score could be increased by 1, e.g. when the volume of "simple data" and/or the characteristics of the controller are such that certain profiling of the individual can be enabled or assumptions about the individual's social/financial status can be made.	2
	The DPC score could be by 2, e.g. when the "simple data" and/or the characteristics of the controller can lead to assumptions about the individual's health status, sexual preferences, political or religious beliefs.	3
	The DPC score could be increased by 3, e.g. when due to certain characteristics of the individual (e.g. vulnerable groups, minors), the information can be critical for their personal safety or physical/psychological conditions.	4
<b>Behavioural data</b>	Eg. location, traffic data, data on personal preferences and habits, etc.	
	<b>Preliminary basic score:</b> when the breach involves "behavioural data" and the controller is not aware of any aggravating or lessening factors.	<b>2</b>
	The DPC score could be decreased by 1, e.g. when the nature of the data set does not provide any substantial insight to the individual's behavioural information or the data can be collected easily (independently from the breach) through publicly available sources (e.g. combination of information from web searches).	1
	The DPC score can be increased by 1, e.g. when the volume of "behavioural data" and/or the characteristics of the controller are such that a profile of the individual can be created, exposing detailed information about his/her everyday life and habits.	3
	The DPC score can be increased by 2, e.g. if a profile based on individual's sensitive data can be created.	4
<b>Financial data</b>	Any type of financial data (e.g. income, financial transactions, bank statements, investments, credit cards, invoices, etc.). Includes social welfare data related to financial information.	
	<b>Preliminary basic score:</b> when the breach involves "financial data" and the controller is not aware of any aggravating or lessening factors.	<b>3</b>
	The DPC score could be decreased by 2, e.g. when the nature of the data set does not provide any substantial insight to the individual's financial information (e.g. the fact that a person is the customer of a certain bank without further details).	1
	The DPC score could be decreased by 1, e.g. when the specific data set includes some financial information but still does not provide any significant insight to the individual's financial status/situation (e.g. simple bank account numbers without further details).	2
	The DPC score could be increased by 1, e.g. when due to the nature and/or volume of the specific data set, full financial (e.g. credit card) information is disclosed that could enable fraud or an detailed social/financial profile is created.	4
<b>Sensitive data</b>	Any type of sensitive data (e.g. health, political affiliation, sexual life)	
	<b>Preliminary basic score:</b> when the breach involves "sensitive data" and the controller is not aware of any lessening factors.	<b>4</b>
	The DPC score could be decreased by 1, e.g. when the nature of the data set does not provide any substantial insight to the individual's behavioural information or the data can be collected easily (independently from the breach) through publicly available sources (e.g. combination of information from web searches).	1
	The DPC score could be decreased by 2, e.g. when nature of data can lead to general assumptions.	2
	The DPC score could be decreased by 1, e.g. when nature of data can lead to assumptions about sensitive information.	3

## Ease of Identification (EI) Scoring

**Negligible** = 0.25

**Limited** = 0.5

**Significant** = 0.75

**Maximum** = 1

(see annex 2 for examples - <https://www.enisa.europa.eu/publications/dbn-severity>)

## Circumstance of Breach (CB) Scoring

<b>A1 - Loss of Confidentiality</b>	
0	<p>Examples of data exposed to confidentiality risks without evidence that illegal processing has occurred:</p> <ul style="list-style-type: none"> <li>• A paper file or laptop is lost during transit.</li> <li>• Equipment has been disposed without destruction of the personal data.</li> </ul>
0.25	<p>Examples of data disposed to a number of known recipients:</p> <ul style="list-style-type: none"> <li>• An email with personal data has been wrongly sent to a number of known recipients.</li> <li>• Some customers could access other customers' accounts in an online service.</li> </ul>
0.5	<p>Examples of data disposed to an unknown number of recipients:</p> <ul style="list-style-type: none"> <li>• Data are published on an internet message board.</li> <li>• Data are uploaded to a P2P site.</li> <li>• An employee sells a CD ROM with customer data.</li> <li>• A wrongly configured website makes publically accessible on internet data from internal users.</li> </ul>
<b>A2 - Loss of Integrity</b>	
0	<p>Examples of data altered but without any identified incorrect or illegal use:</p> <ul style="list-style-type: none"> <li>• The records of a database with personal data have been wrongly updated but the original has been obtained before any use of the altered data occurred.</li> </ul>
0.25	<p>Examples of data altered and possibly used in an incorrect or illegal way but with possibility to recover:</p> <ul style="list-style-type: none"> <li>• A record that is necessary for the provision of an online social service has been changed and the individual needs to ask for the service in an offline way.</li> <li>• A record that is important for the accuracy of an individual's file in an online medical service has been changed.</li> </ul>
0.5	<p>Examples of data altered and possibly used in an incorrect or illegal way without possibility to recover:</p> <ul style="list-style-type: none"> <li>• The previous examples + the original cannot be recovered.</li> </ul>
<b>A3 - Loss of Availability</b>	
0	<p>Examples of data being recoverable without any difficulty:</p> <ul style="list-style-type: none"> <li>• A copy of file is lost but other copies are available.</li> <li>• A database is corrupted but can be easily reconstructed from other databases.</li> </ul>
0.25	<p>Examples of temporal unavailability:</p> <ul style="list-style-type: none"> <li>• A database is corrupted but can be reconstructed from other databases, although some processing is required.</li> <li>• A file is lost but the information can be provided again by the individual.</li> </ul>

0.5	<p>Examples of full unavailability (data cannot be recovered from the controller or the individuals):</p> <ul style="list-style-type: none"> <li>• A file is lost/database corrupted, there is not back up of this information, and it cannot be provided by the individual.</li> </ul>
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**A4 - Malicious Intent**

0.5	<p>The breach was due to an intentional action, eg, in order to cause problem to the data controller (eg, demonstrate loss of security) and/or in order to harm the individuals.</p> <ul style="list-style-type: none"> <li>• An employee of a company intentionally shares private data from customers in a social media public site.</li> <li>• An employee of a company sells private data from customers to another company.</li> <li>• A member of a social network intentionally sends information about other members to their family members in order to harm them.</li> </ul>
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## **Appendix C**

### **Checklists for significant data breach**

#### **First 24 hours**

- Record the moment of discovery
- Alert and activate everyone
- Secure the premises
- Stop additional data loss
- Document everything
- Interview involved parties
- Review notification protocol
- Assess priorities and risks
- Notify the ICO, and if appropriate law enforcement

#### **Next steps (after the first 24 hours)**

##### **Step 1**

Identify the root cause

##### **Step 2**

Continue working with forensics

##### **Step 3**

Identify legal obligations/seek legal advice

##### **Step 4**

Identify our contractual obligations and notify external partners

##### **Step 5**

Report to Directors

##### **Step 6**

Identify any conflicting initiatives that may slow our response time (cancel if necessary)

### Policy Status

<b>Policy Lead (Title)</b>	Trust Data Protection Manager	<b>Review Period</b>	Every 3 years
<b>Reviewed By</b>	Trust Executive Team/ Board of Directors	<b>Equality Impact Assessment Completed (Y/N)</b>	N

### POLICY AMENDMENTS

Version	Approval Date	Page No./Paragraph No.	Amendment	Audience	Plan for Communicating Amendments
Version 1	26/03/2019			NCLT College Staff	
Version 2	TU 28/09/2021 TET 09/11/2021 BoD 13/12/2021	Throughout	Paragraph numbers	NCLT All Staff	Uploaded onto moodle, NCLT website and annual GDPR training
		Pg.3. para 1	Renamed heading to 'Introduction'		
		Pg.3, para 4.3	Data protection laws updated.		
		Pg.5, para 7.2	Updated to include Trust Incident Response Policy		
		Pg.5, para 8.1	Amended wording of sentence		
		Pg.7, para 10.5	Amended wording of sentence		
		P.11, Appendix	Added Appendix B		
		P.14. Appendix	Added Appendix C		