



Karate & Dance Federation

***Data Breach Response
Procedure Policy***

Policy Overview Information

Policy Title	Data Breach Response Procedure
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Date Written	4 th January 2026
Date Implemented	January 2026
Review Date	January 2027
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Agreed By	Mr. Neil Byrne
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Policy Logistics

This policy is intended for the Karate & Dance Federation, which means that both companies within this umbrella organisation must adhere to the policies and procedures in place. These companies are: Central Karate Academy CIC and Midlands Dance Academy Ltd.

Umbrella organisation and governance structure

The Karate & Dance Federation operates as an umbrella organisation responsible for the strategic governance, safeguarding oversight, and operational standards applied across its constituent entities. While Central Karate Academy CIC and Midlands Dance Academy Ltd are separate legal entities with distinct legal structures, they function collectively under the Federation for the purposes of policy implementation, safeguarding assurance, quality control, and risk management.

All policies issued under the name of The Karate & Dance Federation establish a single, consistent framework of expectations, procedures, and standards that apply across both organisations. This ensures that children, families, staff, volunteers, and external partners experience the same level of protection, professionalism, and accountability regardless of which legal entity is delivering a particular activity.

Where statutory, regulatory, or reporting obligations differ due to the legal status of each entity, those obligations are met within the relevant organisation. However, the highest standard of practice set out within Federation policy will always apply. No individual, department, or entity operating within the Federation may adopt a lower standard than that required by Federation policy.

Ultimate responsibility for ensuring compliance with Federation policies sits with the Federation's senior leadership, who retain oversight of safeguarding, health and safety, professional conduct, and quality assurance across all activities delivered under the Federation name.

1. Policy statement and commitment

The Karate & Dance Federation is committed to ensuring the **security, confidentiality, and integrity of all personal data** it holds, including student, parent, staff, volunteer, and partner information.

This procedure ensures that:

- Any suspected or confirmed data breaches are **identified, reported, and managed promptly**
- Responsibilities are clearly defined for all staff and volunteers
- Regulatory obligations under GDPR and UK data protection law are fully met
- The impact on individuals and the organisation is minimised

2. Scope and application

This procedure applies to:

- All personal data held by the Federation, in both digital and paper formats
- All staff, volunteers, contractors, and third-party service providers
- Breaches including accidental disclosure, loss, theft, cyber attack, or unauthorised access

3. Identifying a data breach

A data breach may include, but is not limited to:

- Loss, theft, or unauthorised access to personal data
- Accidental disclosure via email, messaging, or printed materials
- Cybersecurity incidents affecting MyKDF or other IT systems
- Failure to comply with access or storage controls

Staff must be vigilant and report any suspected breaches **immediately** to the Federation DPO or senior leadership.

4. Immediate actions

Upon identification of a suspected breach:

1. **Containment** – Limit further access or disclosure of data
2. **Assessment** – Determine the nature, scope, and potential impact of the breach
3. **Notification** – Inform the Data Protection Officer (DPO) and senior leadership immediately

5. Investigation and reporting

- The DPO or senior leadership will conduct a full investigation, documenting:
 - The type of data involved
 - Number of individuals affected
 - Circumstances of the breach

- Measures taken to mitigate risk
- The incident is recorded in the Federation's secure **Data Breach Log**
- If the breach is likely to result in **risk to individuals' rights or freedoms**, the **Information Commissioner's Office (ICO)** must be notified **within 72 hours**, in accordance with GDPR
- Affected individuals (students, parents, staff, or volunteers) are informed promptly, including advice on protective actions where applicable

6. Corrective actions

- Implement immediate mitigation steps to prevent recurrence
- Review policies, procedures, and security measures, including MyKDF access controls
- Provide additional staff training if breaches are due to human error
- Update risk assessments and document lessons learned

7. Roles and responsibilities

- **Data Protection Officer / Senior Leadership:** Lead investigation, notify regulators, and oversee corrective actions
- **Staff & Volunteers:** Report suspected breaches immediately and cooperate fully with investigations
- **IT / MyKDF Administrators:** Assist in containment, audit trails, and data recovery efforts

8. Monitoring and review

- All data breaches are reviewed and logged to identify trends or systemic weaknesses
- Policies and procedures are updated annually or sooner if regulatory requirements, operational systems, or risks change
- Compliance with GDPR and UK data protection law is regularly audited