Nautilus Education - **Disciplinary Policy: Data Breaches**

**Purpose**  
This policy outlines the disciplinary procedures for staff, contractors, or partners who cause, contribute to, or fail to report a data breach involving Nautilus Education systems, platforms, or client data.

**Scope**  
Applies to all individuals with access to Nautilus Education’s systems, including employees, contractors, consultants, and third-party service providers.

**1. Definition of a Data Breach**

A data breach is any unauthorised access, disclosure, loss, alteration, or destruction of personal, sensitive, or confidential information. This includes but is not limited to:

* Loss or theft of devices containing sensitive data
* Unauthorised sharing of login credentials
* Improper disposal of confidential documents
* Failure to report known or suspected breaches

**2. Responsibilities**

All personnel must:

* Handle data in accordance with Nautilus Education’s Data Protection Policy
* Immediately report any suspected or confirmed breach to the Data Protection Officer (DPO)
* Cooperate fully with investigations

**3. Investigation Process**

Upon notification of a breach:

* The DPO will initiate a formal investigation
* Relevant parties will be interviewed and evidence reviewed
* Findings will be documented and shared with senior leadership
* Severity will be assessed based on impact, intent, and recurrence

**4. Disciplinary Actions**

Disciplinary measures will be proportionate to the nature and severity of the breach. Possible outcomes include:

| **Severity Level** | **Examples** | **Disciplinary Action** |
| --- | --- | --- |
| Minor | Accidental sharing of non-sensitive data | Verbal warning, refresher training |
| Moderate | Failure to report a breach, repeated carelessness | Written warning, mandatory training, access restrictions |
| Serious | Deliberate misuse, unauthorised disclosure of sensitive data | Suspension, termination, legal referral |

**5. Appeals**

Individuals subject to disciplinary action may appeal in writing within 10 working days. Appeals will be reviewed by a senior panel not involved in the original investigation.

**6. Record Keeping**

All breaches and disciplinary actions will be logged securely and retained in accordance with Nautilus Education’s Record Retention Policy.

**7. Review**

This policy will be reviewed annually or following any significant breach or regulatory change.

Would you like this embedded into your broader safeguarding or operational framework? I can also help draft a companion document for staff training or a visual flowchart for breach response.