Data Security Breach Report – Appendix A

This report has been prepared to provide an initial update on data breach incidents from August 1st 2022 to December 5th 2023.

Clear guidance is provided to staff, via training and policies, regarding what constitutes a potential data breach and the steps they should take when a potential data breach is identified. The council's response to potential data breaches is managed by the DPO following the stages below:

- Notification to the DPO
- Initial assessment by the DPO and Section Head
- Escalation to the SIRO (Chief Internal Auditor) if necessary; this may lead to the Information Commissioner (ICO) being notified, dependant on the severity of the incident.
- Remedial Action, for example corrective action, training, revised processes, and potentially disciplinary action.

Overall, there have been 13 data breaches, 13 being notified to the DPO within 72 Hours of which 0 required notification to the ICO.

A summary breakdown follows:

Reference Number	Section	Response in 72 Hours	Reported to ICO	Root Cause	Medium	Data Subjects	Action	Comments, including detail where a breach spans multiple mediums
20221000	Ctax	Yes	No	Human Error	Letter	1	Revised Process	Wrong letter inserted in envelope.
20221001	Housing	Yes	No	Human Error	Email	1	Revised Process	Wrong attachment sent via email.
20221002	Housing	Yes	No	Human Error	Letter	1	Corrective Action	Wrong attachment inserted in envelope
20221200	Housing	Yes	No	Human Error	Email	256	Agency contacted	Disgruntled Agency worker emailed all GBC staff their

								grievances
20230200	Housing	Yes	No	Inappropriate Action by Staff	Image	1	Disciplinary	Agency staff copied and used staff email addresses from none-GBC email account
20230300	Reception	Yes	No	Human Error	Email	1	Revised Process	Email address copied incorrectly so invoice went to wrong email address.
20230301	Housing	Yes	No	Human Error	Letter	1	Revised Process	Email sent with wrong attachment
20230500	Reception	Yes	No	Human Error	Email	1	Revised Process	Email address copied incorrectly so invoice went to wrong email address.
20230700	Planning	Yes	No	Human Error	Email	1	Revised Process	D16 response sent to wrong email address
20230800	Ctax	Yes	No	Human Error	Email	1	Revised Process	Pre-populated form sent instead of blank form
20230801	Housing/Ctax	Yes	No	Human Error	Letter	1	Revised Process	Additional doc printed on reverse of letter -
20231100	Housing	Yes	No	Human Error	Electronic/paper	5	Training	Left briefcase at court
20231101	IT	Yes	No	Human Error	Electronic	<452150	Revised Process/Training	Incorrect data extract selected for processing.

Glossary

Information Commissioner's Office (ICO)

The Information Commissioner's Office is a non-departmental public body which reports directly to the United Kingdom Parliament and is sponsored by the Department for Digital, Culture, Media and Sport. Its role is to uphold information rights in the public interest.
https://ico.org.uk/

Response time/Notifying the ICO of Data Breaches.

The ICO needs to be notified of more serious data breaches. A self-assessment is available on the ICO's website, to identify if it needs to be notified of a data breach. This needs to be done within 72 hours, which is the key response metric monitored by the internal team.
https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/

Medium

This is the format of the information constituting the data breach, more detail is provided in the comments column of the data breaches detail page within this report.
e.g. Electronic, Email, Laptop, Letter, Mobile, Paper, Verbal

Number Impacted

This is the number of individuals whose personal information was potentially compromised through a data breach.

Root Cause

The categories of root cause are based on guidance for the NHS Security Toolkit; this is widely used across the public sector, to assess arrangements against good practice.
e.g. Cyber, Human Error, Inappropriate Action by Staff, Criminal Action, System Error

Action Taken

These are the primary actions taken to respond to/rectify a data breach; e.g. Corrective Action, Disciplinary, Police Notified, Revised Process, Training.