Information Security Incident Reporting Form

Email completed forms as soon as possible to dpo@nwleicestershire.gov.uk
Provide as much information as you can, but do not delay sending in the form.
For urgent incidents (e.g. virus infection), phone the ICT Helpdesk immediately: (01530) 454 718

GENERAL DETAILS	
Incident number:	
Department/Section:	Community Hub
Reporting officer:	Data Protection Officer – form completed by [redacted]
Investigated by:	Nicola Taylor - Data Protection Officer / Sam Outama - ICT Manager
Contact number:	[redacted]
Date form completed:	11.06.2020
Date of incident:	23.04.2020 – onwards
Location of incident	Email
ABOUT THE INCIDENT	
Incident description. What has happened?	Information relating to the Community Hub, was shared with two everyone active employees, via their personal email addresses. The information was not password protected and sent to a personal email address. This information was for the purposes of immediate response required as a result of the ongoing COVID 19 global pandemic.
How was the incident identified?	The incident was identified following conversations with Legal Services Data Protection Officer when looking to improve the communication methods available to us.
What information does it relate to? e.g. a file containing details of 100 service users name, address, direct debit details.	The information relates to individual records containing shielded COVID19 personal data being shared to the everyone active employees, so they could case work. Details included: Name, Address, Date of Birth and Telephone Number
What medium was the information held on? - Paper - USB stick - laptop, etc	Via personal Email addresses (electronic)
If electronic, was the data encrypted?	No
Dealing with the current incident: **Please list initial actions:** - Who has been informed? - What has been done?	Nicola Taylor, Legal Services Sam Outama, ICT Team Manager [redacted] Senior HR Advisor [redacted]
Are further actions planned? If so, what?	Remedial action has been taken for the EA employees to be removed from any circulation of further data and existing data has been instructed to be removed from their devices (11 June 2020), with confirmation that this data has been removed, by xx/xx/xx
Have the staff involved in the security incident	Yes

done any Data Protection Training?	
If so, what and when? (Please list)	Online DP Course
Preventing a recurrence: Has any action been taken to prevent recurrence?	Yes, No further information is to be shared via personal email, with anyone outside of the North West Leicestershire District Council email and Active Directory domainn ~~within North West Leicestershire District Council~~, with regards to this specific case. Data protection training Involvement of IT and Data protection in future business process reviews and setups.
Are further actions planned? If so, what?	

1.	**Was any data lost or compromised in the incident?** e.g. loss of an encrypted laptop will not actually have compromised any information, unless e.g. the user was logged in when they lost it.	No
2.	**Was personal data lost or compromised?** This is data about living individuals such as service users, Councillors or employees. This could be a breach of the Data Protection Act 2018.	Yes
3.	**If yes, was sensitive personal data compromised?** This is data relating to health, ethnicity, sexual life, trade union membership, political or religious beliefs, potential or actual criminal offences. This could be a serious breach of the Data Protection Act 2018.	No
4.	**Was adult social care, health or public health data involved?**	No
5.	**What is the number of people whose data was affected by the incident?**	11
6.	**Is the data breach unlikely to result in a risk to the individual/individuals? Physically, materially, or morally?** Example - physical harm, fraud, reputation, financial loss,	Y – The data shared was with consent.
7.	**Did people affected by the incident give the information to the Council in confidence?** (i.e. with an expectation that it would be kept confidential)	N
8.	**Is there a risk that the incident could lead to damage to individuals e.g. via identity theft/ fraud?** e.g. loss of bank details, NI numbers etc.	N
9.	**Could the incident damage an individual's reputation, or cause hurt, distress or humiliation e.g. loss of medical records, disciplinary records etc.?**	N
10.	**Can the incident have a serious impact on NWLDC's reputation?**	N
11.	**Has any similar incident happened before in the section?**	N
12.	**Please confirm you have contacted HR for advice regarding this incident.**	
13	**If this incident involves the loss or theft of IT Equipment please confirm you have logged a call on the ICT Help & Support Portal on your desktop?**	N/A

FURTHER ACTION: (to be completed by Business Improvement Team)	
Completed by:	Nicola Taylor
Is further action required?	Yes
Have data subjects been informed?	Yes
Have key stakeholders been informed?	Yes
Have control weaknesses been highlighted and recommendations made?	Yes
Has sufficient and appropriate action been taken?	Yes
Does the incident need reporting to Caldicott Guardian/SIRO?	Yes
Does the incident need reporting to the ICO?	Yes

Does the incident need reporting to IT Security Manager?	Yes
Has the Incident Log been updated?	Yes
Further investigation undertaken by:-	
Date incident closed:-	

1. It is not known who completed the error, so I would recommend the on-line Data Protection training for the whole team.		
2. I do not recommend reporting the incident to the ICO as they are spasmodic incidents. However if trends analysis sees an increase of these errors, then it may have to be a future consideration.		
3. The issue seems to involve operatives not being able to leave their workstations when printing documents, as they need to be ready to take the next call. Printing is left in the back office and documents are put into envelopes when someone is available to carry out the task. I recommend that this process is reviewed, and if possible to have additional printers installed next to desks to minimise the risk of incorrect correspondence being issued and improve efficiencies.		

Evidence from Recommendations	**Further Actions**	**Yes/No**

Please contact DPO for any further information:

Nicola Taylor
Data Protection Officer
dataprotectionofficer@nwleicestershire.gov.uk