Information Security Incident Reporting Form

Email completed forms as soon as possible to dataprotectionofficer@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:	Housing. Housing Management
Reporting officer:	[redacted]
Investigated by:	
Contact number:	[redacted]
Date form completed:	6.3.19
Date of incident:	Over a period of months (Dec – Feb)
Location of incident	Unknown
ABOUT THE INCIDENT	
Incident description. What has happened?	An NWLDC employee [redacted] has accessed a rent account for an address at which he resides but is not the tenant. We do not have permission from the tenant to discuss tenancy related issues. The employee accessed the rent account and produced a rent statement. This leaves an audit trail. Rent statements have been produced on non working days, 31 December 2018.
How was the incident identified?	The Housing Officer, [redacted], identified a number of diary entries for the address which is unusual and raised this with [redacted] Principal Housing Management Team Leader who ran an audit of the account. The audit shows what activity took place on what dates/times and by who.
What information does it relate to? e.g. a file containing details of 100 service users name, address, direct debit details.	The diary entries show rent statements have been produced, however [redacted] will have access to all information on the system so it is unknown what other information he has accessed. He will have been able to see diary entries relating to the tenant, specifically those relating to rent arrears.
What medium was the information held on? - Paper - USB stick - laptop, etc	Access electronically. They Housing Management system is Capita.
If electronic, was the data encrypted?	n/a
Dealing with the current incident: **Please list initial actions:** - Who has been informed? - What has been done?	[redacted] was informed at approximately 12noon on 6 March 2019. Shortly after, I spoke with [redacted] for advice on the data breach. Soon thereafter, I met with Nicola Taylor and [redacted]. Nicola advised me to complete this form.
Are further actions planned? If so, what?	[redacted] to undertake HR side of investigation. Nicola Taylor to investigate data breach.
Have the staff involved in the security incident done any Data Protection Training?	Not known.

If so, what and when? (Please list)	Not known.
Preventing a recurrence: Has any action been taken to prevent recurrence?	
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 <u>sensitive</u> 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.	Yes
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?**	1
6.	**Is the data breach <u>unlikely</u> to result in a <u>risk</u> to the individual/individuals? Physically, materially, or morally?** Example - physical harm, fraud, reputation, financial loss,	Unlikely to result in risk to individual.
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)	Yes
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.	Not known.
9.	**Could the incident damage an individual's reputation, or cause hurt, distress or humiliation e.g. loss of medical records, disciplinary records etc.?**	No
10.	**Can the incident have a serious impact on NWLDC's reputation?**	Yes
11.	**Has any similar incident happened before in the section?**	Not known.
12.	**Please confirm you have contacted HR for advice regarding this incident.**	Contact by Sam Otama
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:	
Is further action required?	
Have data subjects been informed?	
Have key stakeholders been informed?	
Have control weaknesses been highlighted and recommendations made?	
Has sufficient and appropriate action been taken?	
Does the incident need reporting to Caldicott Guardian/SIRO?	
Does the incident need reporting to the ICO?	
Does the incident need reporting to IT Security Manager?	
Has the Incident Log been updated?	
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