

## Information Security Incident Reporting Form

Email completed forms as soon as possible to [dataprotectionofficer@nwleicestershire.gov.uk](mailto: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	
<b>Incident number:</b>	
<b>Department/Section:</b>	
<b>Reporting officer:</b>	Anonymous
<b>Investigated by:</b>	Nicola Taylor
<b>Contact number:</b>	
<b>Date form completed:</b>	24.04.2019
<b>Date of incident:</b>	Mar-Apr
<b>Location of incident</b>	Letter
ABOUT THE INCIDENT	
<b>Incident description. What has happened?</b>	Election letter has been sent to a registered individual which includes their name, address, dob, home & work tel, nationality, NI no, sort code & account number. The letter was sent to a previous address.
<b>How was the incident identified?</b>	The individual queried why they hadn't received confirmation of their election duties.
<b>What information does it relate to?</b> e.g. a file containing details of 100 service users name, address, direct debit details.	The letter is to confirm the election duties, including payment total. On the reverse of the letter it includes: Name, Address, Home & Work telephone number, DOB, Nationality, NI no, Sort Code & Account Number.
<b>What medium was the information held on?</b> <ul style="list-style-type: none"> <li>- Paper</li> <li>- USB stick</li> <li>- laptop, etc</li> </ul>	Paper
<b>If electronic, was the data encrypted?</b>	
<b>Dealing with the current incident: Please list initial actions:</b> <ul style="list-style-type: none"> <li>- Who has been informed?</li> <li>- What has been done?</li> </ul>	Elections team have been informed although remedial action is currently being investigated as the spreadsheet where the data is held was up to date. Elections team are to identify how the error occurred and what action will be taken to prevent a reoccurrence.
<b>Are further actions planned?</b> If so, what?	DPO meeting with Elections team leader Amendments made to the letter Investigation as to how this breach has occurred
<b>Have the staff involved in the security incident done any Data Protection Training?</b>	Yes, annual GDPR training

<b>If so, what and when? (Please list)</b>	Learning pool – May 2018	
<b>Preventing a recurrence: Has any action been taken to prevent recurrence?</b>	Under investigation Amendments made to the letter to protect data subjects personal data	
<b>Are further actions planned? If so, what?</b>		
<b>1.</b>	<b>Was any data lost or compromised in the incident?</b> 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
<b>2.</b>	<b>Was personal data lost or compromised?</b> This is data about living individuals such as service users, Councillors or employees. This could be a breach of the Data Protection Act 2018.	No
<b>3.</b>	<b>If yes, was <u>sensitive</u> personal data compromised?</b> 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
<b>4.</b>	<b>Was adult social care, health or public health data involved?</b>	No
<b>5.</b>	<b>What is the number of people whose data was affected by the incident?</b>	1 reported
<b>6.</b>	<b>Is the data breach <u>unlikely</u> to result in a <u>risk</u> to the individual/individuals? Physically, materially, or morally?</b> Example - physical harm, fraud, reputation, financial loss,	Potential risk of fraud
<b>7.</b>	<b>Did people affected by the incident give the information to the Council in confidence?</b> (i.e. with an expectation that it would be kept confidential)	Yes
<b>8.</b>	<b>Is there a risk that the incident could lead to damage to individuals e.g. via identity theft/ fraud?</b> e.g. loss of bank details, NI numbers etc.	Yes
<b>9.</b>	<b>Could the incident damage an individual's reputation, or cause hurt, distress or humiliation e.g. loss of medical records, disciplinary records etc.?</b>	No
<b>10.</b>	<b>Can the incident have a serious impact on NWLDC's reputation?</b>	No
<b>11.</b>	<b>Has any similar incident happened before in the section?</b>	No
<b>12.</b>	<b>Please confirm you have contacted HR for advice regarding this incident.</b>	Yes
<b>13</b>	<b>If this incident involves the loss or theft of IT Equipment please confirm you have logged a call on the ICT Help &amp; Support Portal on your desktop?</b>	N/A

<b>FURTHER ACTION: (to be completed by DPO)</b>	
<b>Completed by:</b>	N Taylor
<b>Is further action required?</b>	Remedial action
<b>Have data subjects been informed?</b>	Yes
<b>Have key stakeholders been informed?</b>	No
<b>Have control weaknesses been highlighted and recommendations made?</b>	Yes
<b>Has sufficient and appropriate action been taken?</b>	Yes
<b>Does the incident need reporting to Caldicott Guardian/SIRO?</b>	No
<b>Does the incident need reporting to the ICO?</b>	No
<b>Does the incident need reporting to IT Security Manager?</b>	No
<b>Has the Incident Log been updated?</b>	Yes
<b>Further investigation undertaken by:-</b>	N Taylor
<b>Date incident closed:-</b>	

<p>1. It is not known who completed the error, so I would recommend the on-line Data Protection training for the whole team.</p>		
<p>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.</p>		
<p>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.</p>		

Evidence from Recommendations	Further Actions	Yes/No
<p>Bank details and NINO have since been left blank on the form for the data subject to complete.</p>	<p>Advised by DPO to provide a blank form at the election training for the data subjects to complete and hand in to democratic services at the end of the session.</p>	
<p>Discussion with payroll regarding to understand what they require to manage payments.</p>	<p>DPO to arrange meeting with payroll. Gain an understanding of what data they need.</p>	
<p>Actions to be implemented for future elections that are grouped closely together (within 12 month period)</p>	<p>Contact the data subject to confirm appointment for election work. Provide an opportunity for the individual to make us aware of changes if necessary otherwise</p>	

	details will remain the same.	
<b>Discuss other methods of collecting the data</b>	DPO to meet with dems to understand what data is needed and how we can achieve that without putting data subjects information at risk.	

Please contact DPO for any further information:

Nicola Taylor

Data Protection Officer

[dataprotectionofficer@nwleicestershire.gov.uk](mailto:dataprotectionofficer@nwleicestershire.gov.uk)