

# **FARINGDON TOWN COUNCIL**

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Clerk: Sally Thurston



## **Data Breach Response plan**

- A. A data breach of any size is a crisis management situation, which could put an entire council at risk. Data security is not an IT issue, it is an organisational risk, and breach response should involve people from a number of roles across the council.
- B. This policy is a response plan and outlines a breach response procedure which can be implemented at short notice to deal with the crisis.
- C. Failure to follow this policy increases the regulatory, litigation and reputation risk to the entire council.
- D. The Town Clerk or Deputy Town Clerk are responsible for managing breaches, with full decision-making authority.

### **1. Alert**

In the case of a data breach the Town Clerk or Deputy Town Clerk should be notified immediately and provided the following information:

- (i) When the breach occurred (time and date)
- (ii) Description of the breach (type of personal information involved)
- (iii) Cause of the breach (if known) otherwise how it was discovered.
- (iv) Which system(s) if any are affected?
- (v) Which department/staff members are involved?
- (vi) Whether corrective action has occurred to remedy or ameliorate the breach (or suspected breach)

### **2. Assess and determine the potential impact**

Once notified of the information above, The Town Clerk or Deputy Town Clerk will consider whether a privacy data breach has (or is likely to have) occurred and make a preliminary judgement as to its severity.

Criteria for determining whether a privacy data breach has occurred:

- (a) Is personal information involved?
- (b) Is the personal information of a sensitive nature?
- (c) Has there been unauthorised access to personal information, or unauthorised disclosure of personal information, or loss of personal information in circumstances where access to the information is likely to occur?

Criteria for determining severity

- (a) The type and extent of personal information involved
- (b) Whether multiple individuals have been affected

- (c) Whether the information is protected by any security measures (password protection or encryption)
- (d) The person or kinds of people who now have access
- (e) Whether there is (or could there be) a real risk of serious harm to the affected individuals
- (f) Whether there could be media or stakeholder attention as a result of the breach or Suspected breach

### **3. Report**

If the Town Clerk or Deputy Town Clerk determine a data breach (or suspected breach) has occurred the Town clerk or Deputy Town clerk will inform the Information Commissioners Office (ICO) and seek advice.