

Data Breach Policy

1. When there is a personal data breach, the ICO advises:

*Tell it all. Tell it fast. Tell the truth.*

1. The **individual NWCPP partner is the named data processor for their own client work, and is responsible for handling personal data breaches**. In particular he or she evaluates what the breach is and how it occurred, and the associated risk to data subjects and NWCPP.
2. If there is a risk to data subjects, the breach must be **reported to the Information Commissioners Office in 72 hours**. If the report is late, an explanation must be given as to why.
3. **Where the risk to data subjects is high, the breach must be reported to them individually** if at all possible. If there is a large number of data subjects at risk, it may not be logistically possible to do so, in which case a press release should be given and notification provided on the NWCPP website.
4. **NWCPP encrypts or password protects** personal data such as identification records and medical and health records.
5. The ICO will want to know how the breach occurred, what steps are being taken to reduce the risk, and how a similar breach is to be avoided in future. The initial report need contain no more than a summary of the position. The data processor or NWCPP may wish to seek authority to obtain legal advice before submitting the initial and any subsequent reports.
6. A **thorough investigation and corrective action** are necessary so as to reduce the risks to data subjects arising out of any breach, and to make sure that something similar does not happen again in future.
7. Where a breach of computer systems used by NWCPP partners is suspected, the data processor will wish to engage **IT support** to identify the nature of any breach, and remedy it.
8. The **theft of data**, whether as a result of shortcomings in the physical security arrangements on the premises, or the hacking and penetration of computer systems, should be reported immediately to the police.
9. **The breach, investigation and corrective actions must be documented**. So, too, should the report made to the ICO.
10. NWCPP partners agree to **take the protection of personal data seriously and take all reasonable steps to reduce the risk of data breaches.** They further agree that any data breaches, however minor and whether reportable or not, will be recorded and shared, so that we can learn from our mistakes, and so that further preventative action can be taken.