



## Audlem Parish Council

### Data Breach Response Policy

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.

Planning for a breach is therefore essential; every council should have in place a breach response plan, and should designate, in advance, a breach response team which can be convened at short notice to deal with the crisis.

Understanding the issues that arise in a breach situation, and practising managing a breach, are essential to effective breach response. Failure to plan and practise increases the regulatory, litigation and reputation risk to the entire council.

The checklist below sets out the key issues which a council should consider in preparing for a data breach.

#### **1. Breach response plan**

- a)** Notify the Chair of the Parish Council and the Parish Clerk in the event of a data breach. In the event of one of these officers being unavailable, notify the Vice Chair of the Parish Council
- b)** The Chair of the Parish Council and the Parish Clerk hold joint decision making responsibility
- c)** External assistance in the event of a breach will be obtained from CHALC
- d)** In the event of a breach, information from the ICO and NALC will be used to triage the response.

#### **2. Legal issues**

- a)** The data breach reporting template will be used for managing and logging steps taken in the investigation.
- b)** Consideration will be given to notifying data subjects and / or regulators.
- c)** In the event that reporting to the ICO is necessary, the following information will need to be reported:

What happened.

When it happened.

How it happened.

How many people could be affected?

What sort of data has been breached?

What did you have in place that could have stopped it?

What have you done to help the people this affects?

What have you learned?

How can you stop similar breaches in the future?

The Information Commissioners Office can be contacted via: [ico.org.uk](https://ico.org.uk) or 0303 123 1113

Audlem Parish Council is registered with the ICO, reference ZA105006