



Portsmouth
CITY COUNCIL

Data Security Breach Report Appendix A

Executive Summary

This report has been prepared to provide an update on data breach incidents for the period from Friday, Oct 1 2021 to Wednesday, Feb 16 2022.

Clear guidance is provided to staff, via training and Policy Hub, regarding what constitutes a potential data breach and the steps they should take when a potential data breach is identified.

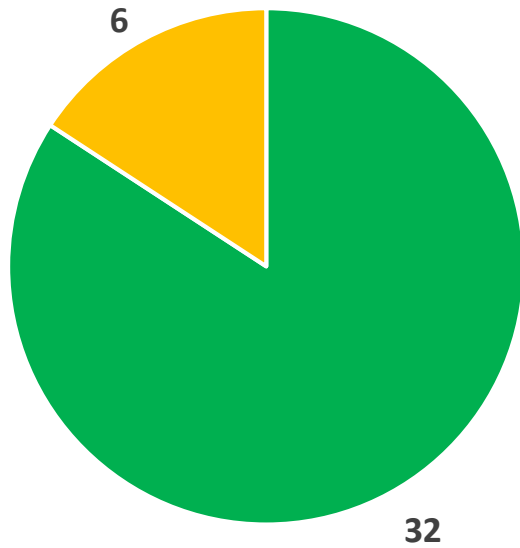
The Council's response to potential data breaches is managed by a central team, following the stages summarised below:

- Notification to central team.
- Initial assessment by central team.
- Escalation to the Senior Information Risk Owner - SIRO (Chief Internal Auditor) if necessary; this may lead to the Information Commissioner (ICO) being notified, dependent on the severity of the incident.
- Remedial action, for example corrective action, training, revised processes and potential disciplinary action.

Overall there have been 38 data breaches, 32 being notified to the central team in under 72 hours and 0 requiring notification to the ICO. Responses by the ICO are shown below:

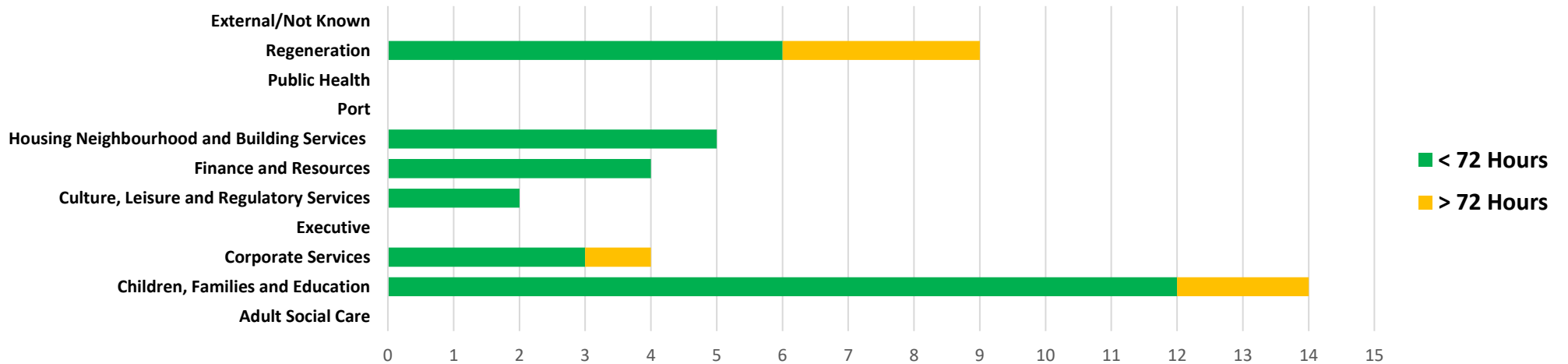
A detailed breakdown of data breaches from Friday, Oct 1 2021 to Wednesday, Feb 16 2022 is provided at the end of this report.

Response Time

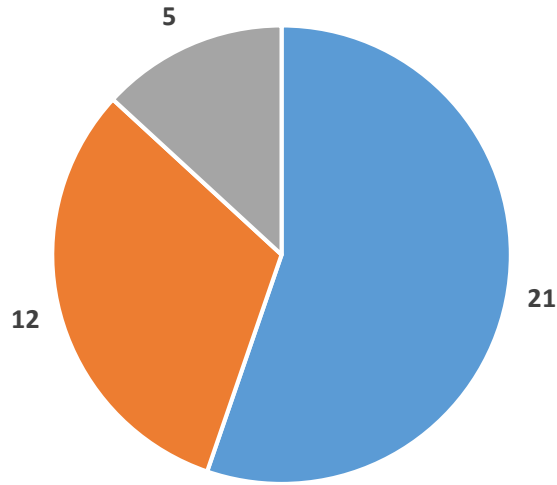


	< 72 hours	> 72 hours	TOTAL
Adult Social Care	0	0	0
Children, Families and Education	12	2	14
Corporate Services	3	1	4
Executive	0	0	0
Culture, Leisure and Regulatory Services	2	0	2
Finance and Resources	4	0	4
Housing Neighbourhood and Building Services	5	0	5
Port	0	0	0
Public Health	0	0	0
Regeneration	6	3	9
External/Not Known	0	0	0
TOTAL	32	6	38

Response time is the time taken for the central team to be notified by the service within which the breach has taken place. ICO guidance is that this should take place within a maximum 72-hour timeframe.

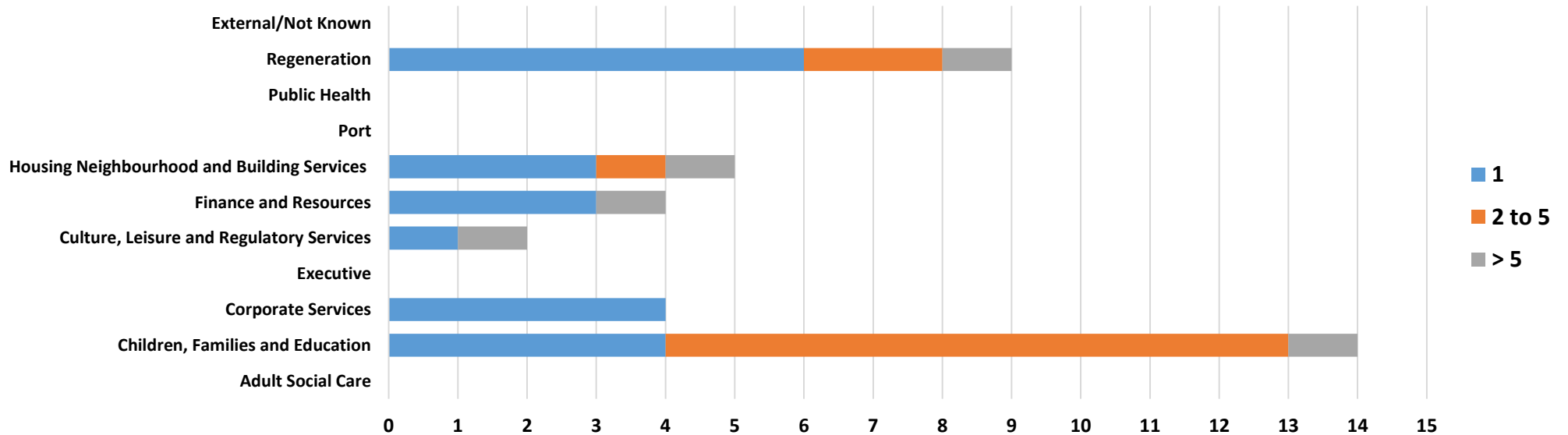


Number Impacted

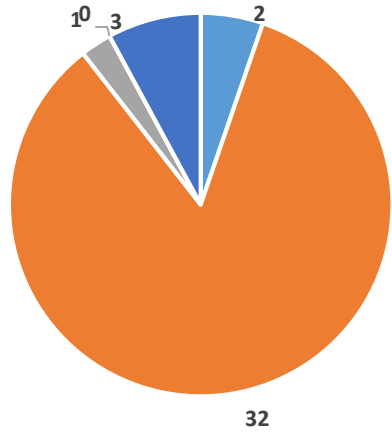


	1	2 to 5	> 5	TOTAL
Adult Social Care	0	0	0	0
Children, Families and Education	4	9	1	14
Corporate Services	4	0	0	4
Executive	0	0	0	0
Culture, Leisure and Regulatory Services	1	0	1	2
Finance and Resources	3	0	1	4
Housing Neighbourhood and Building Services	3	1	1	5
Port	0	0	0	0
Public Health	0	0	0	0
Regeneration	6	2	1	9
External/Not Known	0	0	0	0
TOTAL	21	12	5	38

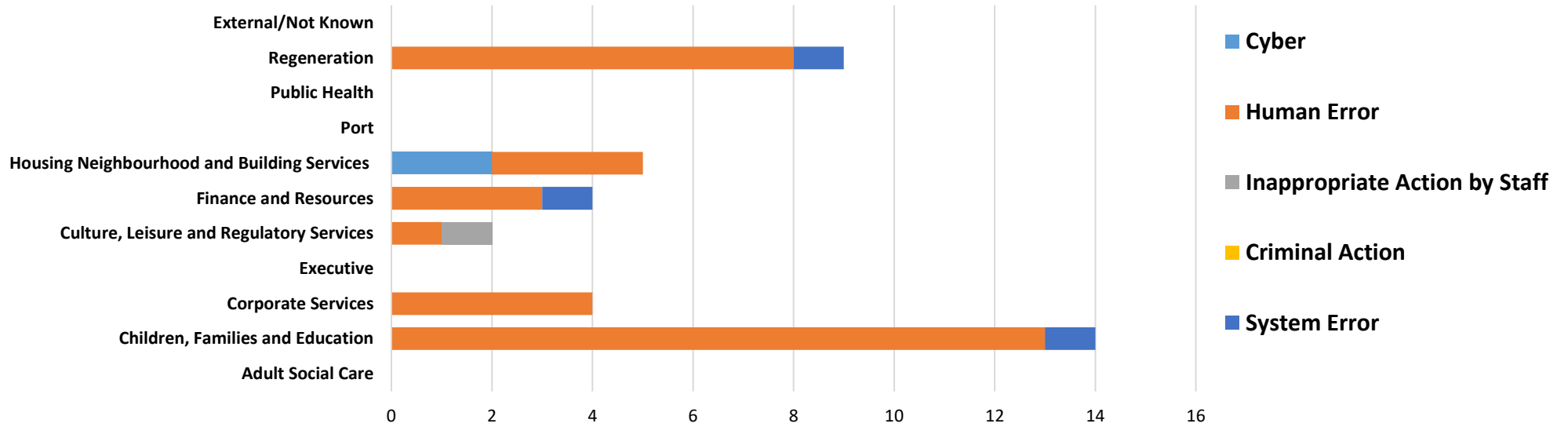
Totals refer to the number of individuals either confirmed or likely to have been impacted.



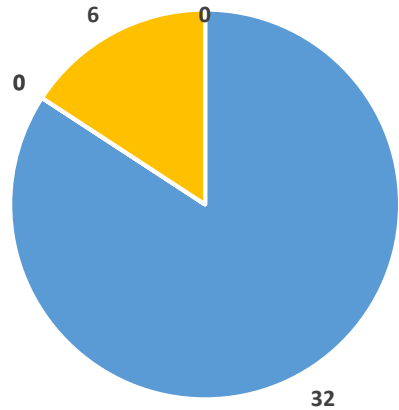
Root Cause



	Cyber	Human Error	Inappropriate Action by Staff	Criminal Action	System Error	TOTAL
Adult Social Care	0	0	0	0	0	0
Children, Families and Education	0	13	0	0	1	14
Corporate Services	0	4	0	0	0	4
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	1	1	0	0	2
Finance and Resources	0	3	0	0	1	4
Housing Neighbourhood and Building Services	2	3	0	0	0	5
Port	0	0	0	0	0	0
Public Health	0	0	0	0	0	0
Regeneration	0	8	0	0	1	9
External/Not Known	0	0	0	0	0	0
TOTAL	2	32	1	0	3	38

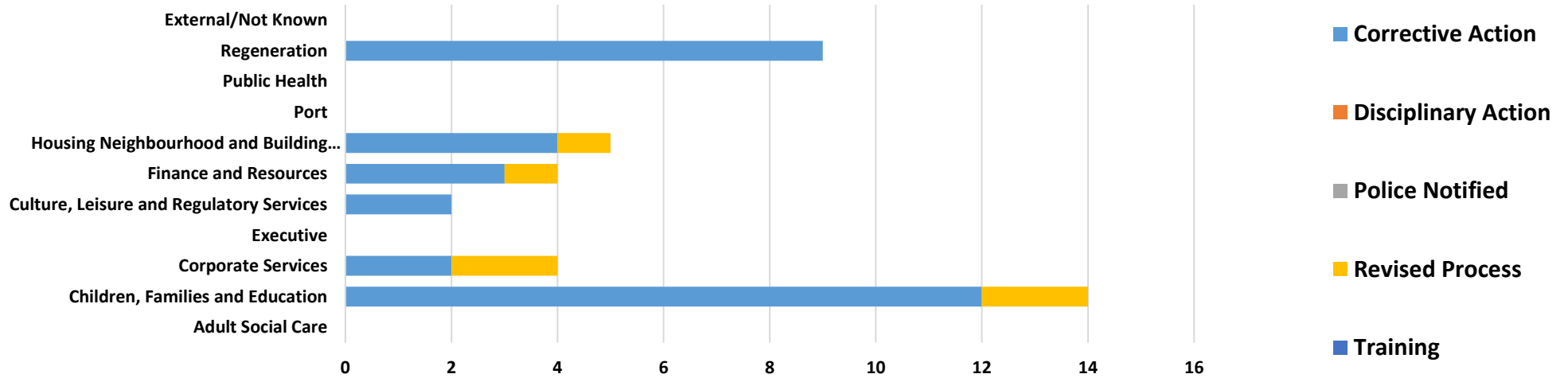


Action Taken



	Corrective Action	Disciplinary	Police Notified	Revised Process	Training	TOTAL
Adult Social Care	0	0	0	0	0	0
Children, Families and Education	12	0	0	2	0	14
Corporate Services	2	0	0	2	0	4
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	2	0	0	0	0	2
Finance and Resources	3	0	0	1	0	4
Housing Neighbourhood and Building Services	4	0	0	1	0	5
Port	0	0	0	0	0	0
Public Health	0	0	0	0	0	0
Regeneration	9	0	0	0	0	9
External/Not Known	0	0	0	0	0	0
TOTAL	32	0	0	6	0	38

Apologies are routinely given, to data subject(s) and to others adversely impacted by data breaches.



Data Breaches Summary

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2021069	Children, Families and Education	Y	N	Human Error	Revised Process	Educational psychology report sent to wrong parent
DB2021070	Corporate Services	Y	N	Human Error	Revised Process	New starter documentation emailed to wrong manager
DB2021071	Children, Families and Education	Y	N	Human Error	Corrective Action	Looked After Child progress report emailed to the wrong foster carer
DB2021072	Regeneration	Y	N	Human Error	Corrective Action	Internal email containing customer names and driving licence sent to resident
DB2021073	Corporate Services	Y	N	Human Error	Corrective Action	Email sent to the wrong complainant
DB2021074	Corporate Services	Y	N	Human Error	Revised Process	Benefit decision notification sent to the Removal Firm rather than to the landlord/claimant
DB2021075	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to the wrong address
DB2021076	Children, Families and Education	N	N	Human Error	Corrective Action	Child Protection report sent to wrong professionals
DB2021077	Regeneration	N	N	Human Error	Corrective Action	Blue badge sent to the badge holder's previous address
DB2021078	Regeneration	N	N	Human Error	Corrective Action	Email sent to the wrong address
DB2021079	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Sensitive document scanned to the wrong email account

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2021080	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to the wrong staff member with the same name as the intended recipient
DB2021081	Finance and Resources	Y	N	Human Error	Corrective Action	Email sent to the wrong address (as supplied by the data subject)
DB2021082	Children, Families and Education	Y	N	System Error	Revised Process	GP received information from PCC relating to a patient no longer registered with the practice
DB2021083	Finance and Resources	Y	N	System Error	Revised Process	Incorrect user ID assigned to a user's record in Fusion
DB2021084	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Letter sent to the wrong address
DB2021085	Regeneration	Y	N	Human Error	Corrective Action	List of names found in PCC laptop bag returned to IT
DB2021086	Children, Families and Education	Y	N	Human Error	Corrective Action	Post sent to old address
DB2021087	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong professionals' email address
DB2021088	Housing Neighbourhood and Building Services	Y	N	Cyber	Corrective Action	Addresses of 4 PCC tenants disclosed as a result of cyber attack on contractor
DB2022001	Children, Families & Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022002	Children, Families and Education	N	N	Human Error	Corrective Action	Email sent to wrong address

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022003	Housing Neighbourhood and Building Services	Y	N	Cyber	Revised Process	Confidential meeting invitations visible in Outlook calendar entries
DB2022004	Children, Families and Education	Y	N	Human Error	Corrective Action	Post sent to old address
DB2022005	Regeneration	Y	N	Human Error	Corrective Action	Complaint to PCC emailed directly to the company that was the subject of the complaint
DB2022006	Regeneration	N	N	Human Error	Corrective Action	PCN details visible through envelope window
DB2022007	Culture, Leisure and Regulatory Services	Y	N	Inappropriate Action by Staff	Corrective Action	Staff shared password
DB2022008	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong address
DB2022009	Regeneration	Y	N	System Error	Corrective Action	Staff members inappropriately allowed access to each other's mailboxes
DB2022010	Children, Families and Education	Y	N	Human Error	Corrective Action	Lost PCC mobile phone
DB2022011	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong distribution list
DB2022012	Finance and Resources	Y	N	Human Error	Corrective Action	Payroll file sent to incorrect school
DB2022013	Regeneration	Y	N	Human Error	Corrective Action	Member of public copied into email in error
DB2022014	Regeneration	Y	N	Human Error	Corrective Action	E-mail sent to wrong recipient

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022015	Finance and Resources	Y	N	Human Error	Corrective Action	Letter sent to wrong PCC staff member
DB2022016	Children, Families and Education	Y	N	Human Error	Corrective Action	Email copied to wrong staff member
DB2022017	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipients
DB2022018	Corporate Services	N	N	Human Error	Corrective Action	Email sent to wrong PCC email address

Glossary

Information Commissioner's Office (ICO)

The Information Commissioner's Office is a non-departmental public body which reports directly to the United Kingdom Parliament and is sponsored by the Department for Digital, Culture, Media and Sport. Its role is to uphold information rights in the public interest.

<https://ico.org.uk/>

Response time/Notifying the ICO of Data Breaches

The ICO needs to be notified of more serious data breaches. A self-assessment is available on the ICO's website, to identify if it needs to be notified of a data breach. This needs to be done within 72 hours, which is the key response metric monitored by the internal team.

<https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/>

Medium

This is the format of the information constituting the data breach. In the summary graph towards the beginning of the report where a breach occurs in multiple formats this is categorised as 'multiple'; more detail is provided in the comments column of the data breaches detail page within this report.

Number Impacted

This is the number of individuals whose personal information was potentially compromised through a data breach.

Root Cause

The categories of root cause are based on guidance for the NHS Security Toolkit; this is widely used across the public sector, to assess arrangements against good practice.

Action Taken

These are the primary actions taken to respond to/rectify a data breach; all breaches result in an apology to those impacted.