



Portsmouth
CITY COUNCIL

Data Breaches March to August 2022

Executive Summary

This report has been prepared to provide an update on data breach incidents for the period from March 1 2022 to August 31 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:

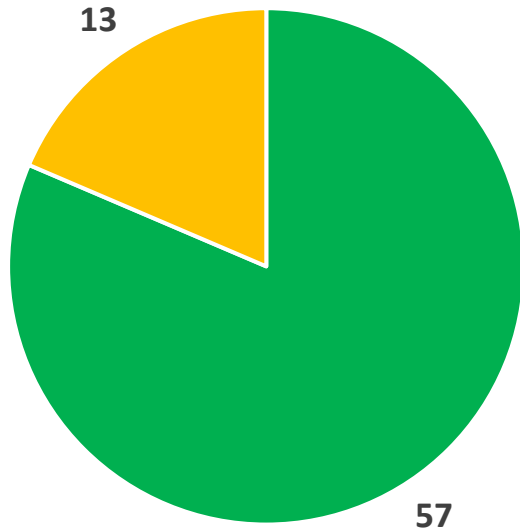
- Notification to central team.
- Initial assessment by central team.
- Escalation to the Senior Information Risk Owner - SIRO (Chief Internal Auditor) if necessary; this may lead to the Information Commissioner (ICO) being notified, dependent on the severity of the incident.
- Remedial action, for example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

Overall there have been 70 data breaches, 57 being notified to the central team in under 72 hours and 2 requiring notification to the ICO. Responses by the ICO are shown below:

Action	Number
No further action	1
Issue of an Information Notice (requiring additional information for the case to be considered)	0
Issue of and Enforcement Notice (requiring the organisation to sign an agreement to confirm certain actions will be carried out)	0
Issue of and Assessment Notice (requiring the inspection of records or premises)	0
Issue of a Court Order (for failing to comply with a notice)	0
Issue of a Penalty Notice (a monetary penalty)	0
Prosecution	0
Awaiting Outcome	1

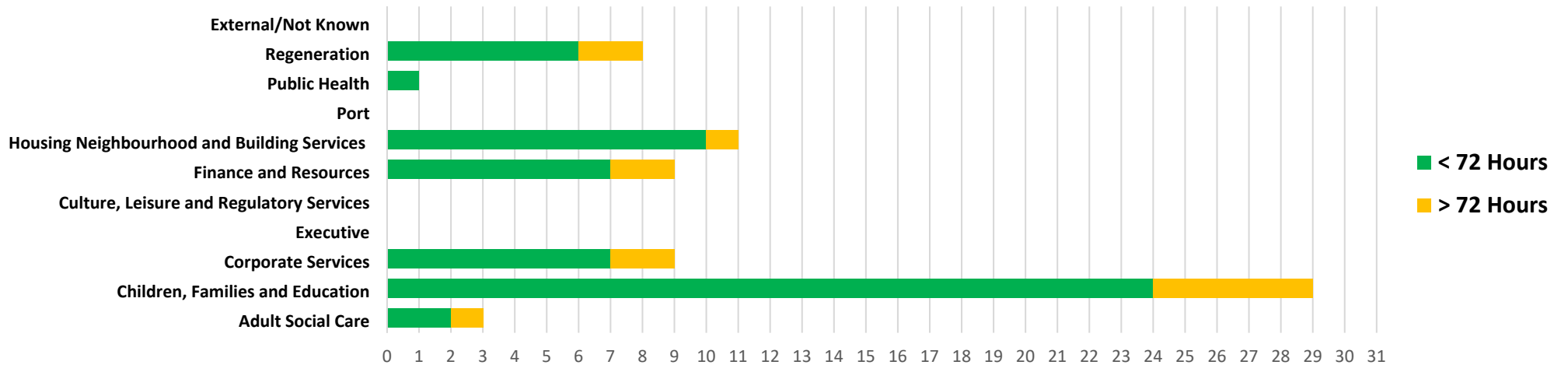
A detailed breakdown of data breaches is provided at the end of this report.

Response Time

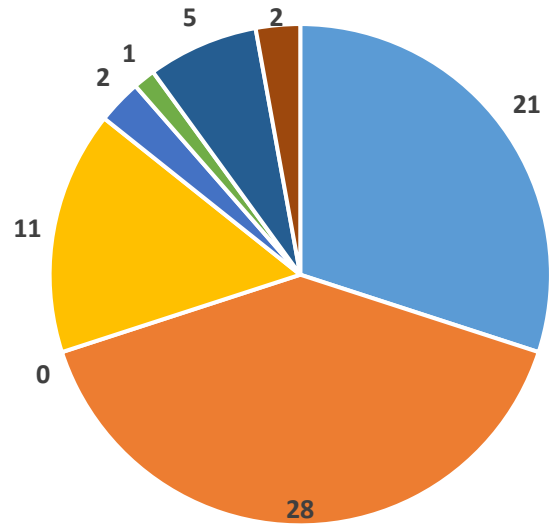


	< 72 hours	> 72 hours	TOTAL
Adult Social Care	2	1	3
Children, Families and Education	24	5	29
Corporate Services	7	2	9
Executive	0	0	0
Culture, Leisure and Regulatory Services	0	0	0
Finance and Resources	7	2	9
Housing Neighbourhood and Building Services	10	1	11
Port	0	0	0
Public Health	1	0	1
Regeneration	6	2	8
External/Not Known	0	0	0
TOTAL	57	13	70

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.

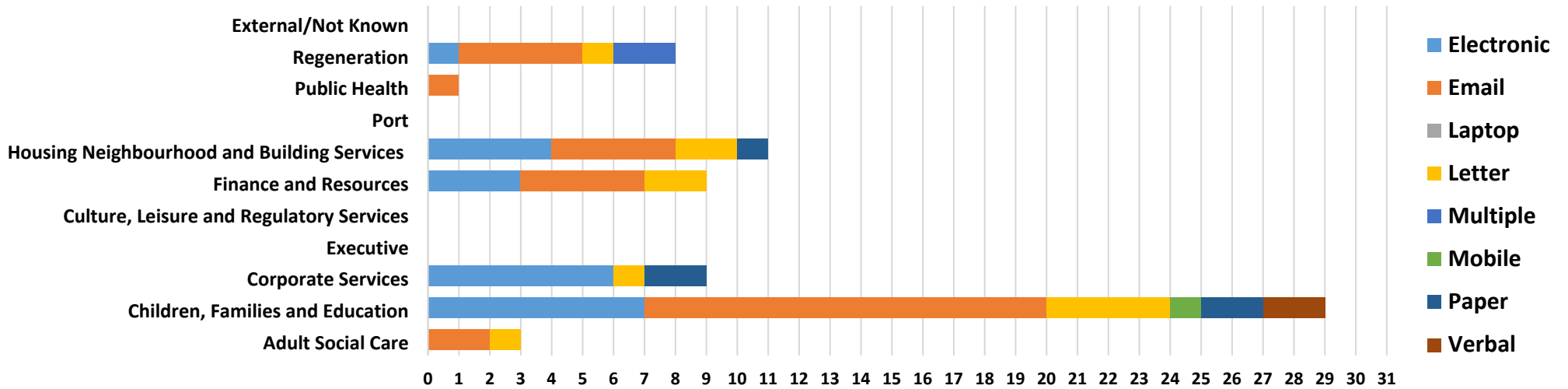


Medium

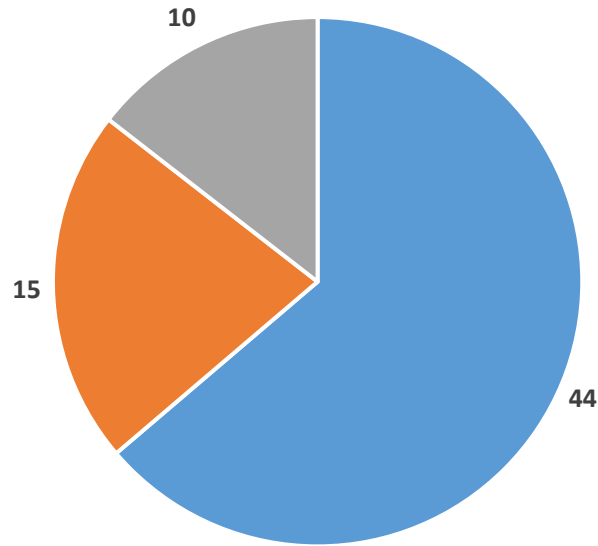


	Electronic	Email	Laptop	Letter	Multiple	Mobile	Paper	Verbal	TOTAL
Adult Social Care	0	2	0	1	0	0	0	0	3
Children, Families and Education	7	13	0	4	0	1	2	2	29
Corporate Services	6	0	0	1	0	0	2	0	9
Executive	0	0	0	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0	0	0	0	0	0
Finance and Resources	3	4	0	2	0	0	0	0	9
Housing Neighbourhood and Building Services	4	4	0	2	0	0	1	0	11
Port	0	0	0	0	0	0	0	0	0
Public Health	0	1	0	0	0	0	0	0	1
Regeneration	1	4	0	1	2	0	0	0	8
External/Not Known	0	0	0	0	0	0	0	0	0
TOTAL	21	28	0	11	2	1	5	2	70

These refer to the format in which the data breach occurred. Often data breaches can occur across multiple mediums. Where this is the case data breaches are recorded against 'multiple' on this page, with more detail provided on the detail summary, towards the back of this report.

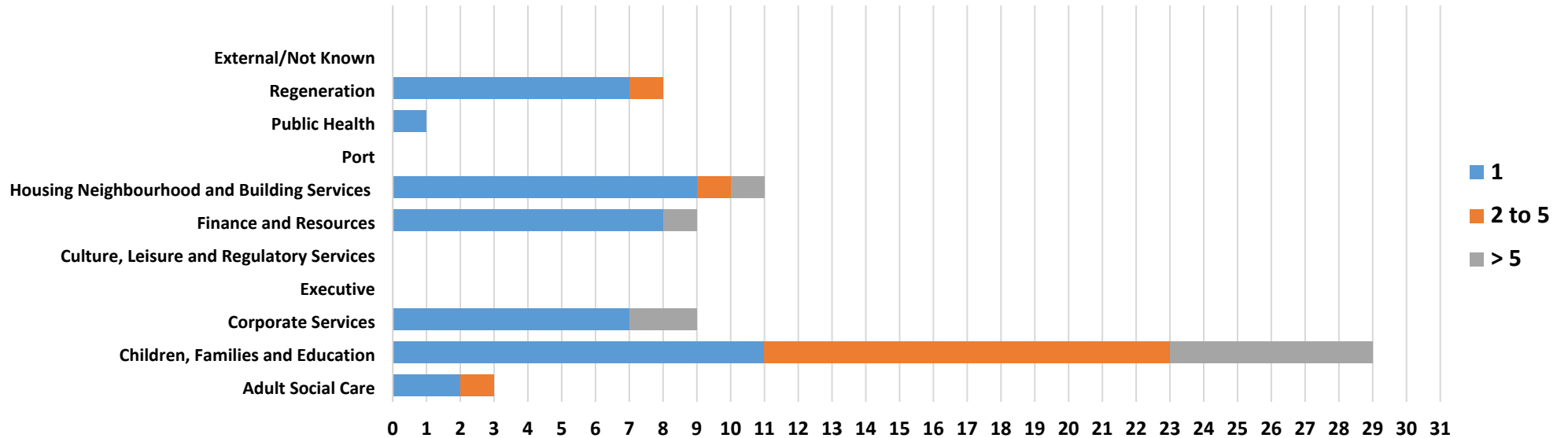


Number Impacted

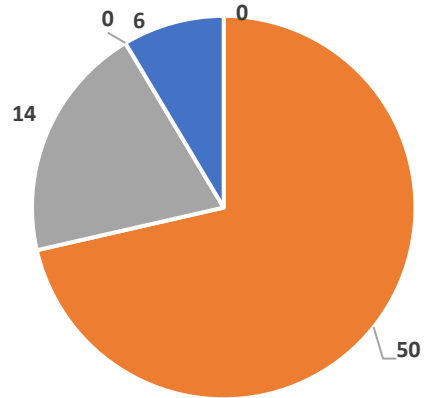


	1	2 to 5	> 5	TOTAL
Adult Social Care	2	1	0	3
Children, Families and Education	11	12	6	29
Corporate Services	7	0	2	9
Executive	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0
Finance and Resources	8	0	1	9
Housing Neighbourhood and Building Services	9	1	1	11
Port	0	0	0	0
Public Health	1	0	0	1
Regeneration	7	1	0	8
External/Not Known	0	0	0	0
TOTAL	45	15	10	70

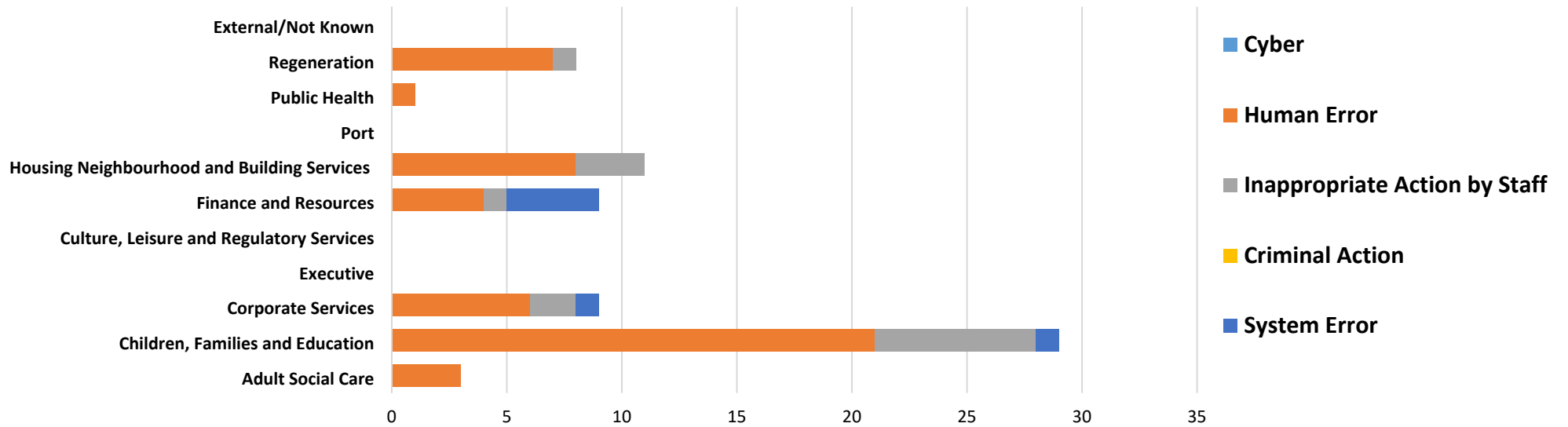
Totals refer to the number of individuals either confirmed or likely to have been impacted.



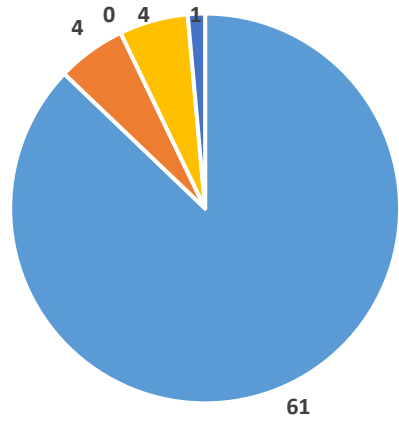
Root Cause



	Cyber	Human Error	Inappropriate Action by Staff	Criminal Action	System Error	TOTAL
Adult Social Care	0	3	0	0	0	3
Children, Families and Education	0	21	7	0	1	29
Corporate Services	0	6	2	0	1	9
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0	0	0
Finance and Resources	0	4	1	0	4	9
Housing Neighbourhood and Building Services	0	8	3	0	0	11
Port	0	0	0	0	0	0
Public Health	0	1	0	0	0	1
Regeneration	0	7	1	0	0	8
External/Not Known	0	0	0	0	0	0
TOTAL	0	50	14	0	6	70

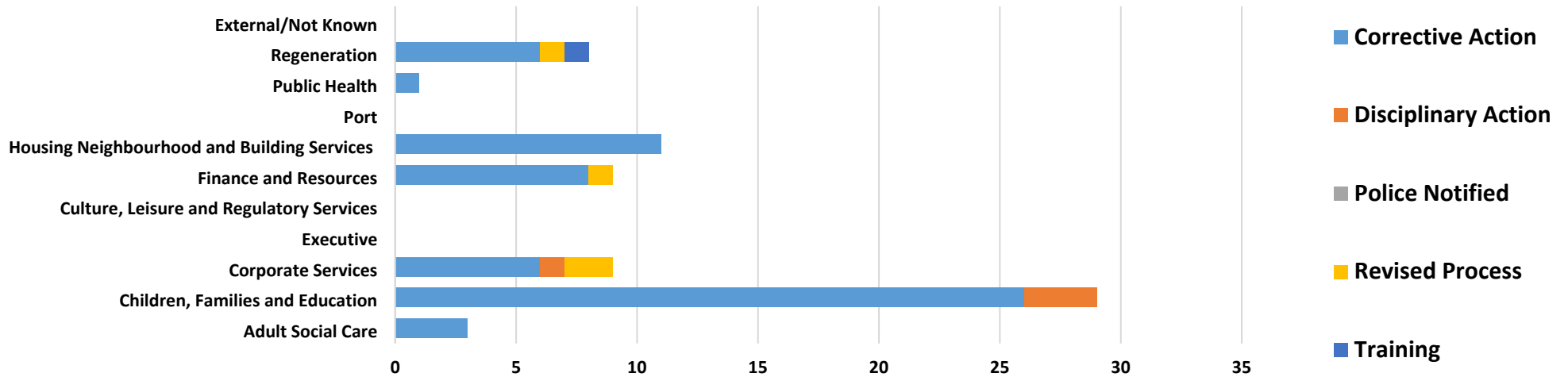


Action Taken



	Corrective Action	Disciplinary	Police Notified	Revised Process	Training	TOTAL
Adult Social Care	3	0	0	0	0	3
Children, Families and Education	26	3	0	0	0	29
Corporate Services	6	1	0	2	0	9
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0	0	0
Finance and Resources	8	0	0	1	0	9
Housing Neighbourhood and Building Services	11	0	0	0	0	11
Port	0	0	0	0	0	0
Public Health	1	0	0	0	0	1
Regeneration	6	0	0	1	1	8
External/Not Known	0	0	0	0	0	0
TOTAL	61	4	0	4	1	70

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
DB2022020	Corporate Services	Y	N	Human Error	Corrective Action	Customers details emailed to the wrong customer
DB2022021	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Rent letter sent to incorrect address
DB2022022	Regeneration	Y	N	Inappropriate Action by Staff	Training	Incorrect address input onto system resulting in letter being sent to wrong address.
DB2022023	Children, Families and Education	Y	N	Human Error	Corrective Action	Letter sent to wrong address
DB2022024	Children, Families and Education	Y	N	Human Error	Corrective Action	Court order sent to incorrect person due to illegible handwriting of member of public
DB2022025	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Corrective Action	Complaint sent directly to contractor, disclosing member of public's name and email address
DB2022026	Children, Families and Education	Y	N	Human Error	Corrective Action	Lost mobile phone
DB2022027	Finance and Resources	Y	N	Human Error	Corrective Action	Staff member given access to another staff member's account on Fusion in error
DB2022028	Children, Families and Education	Y	N	Human Error	Corrective Action	Email addresses of multiple recipients included in "to" field rather than "bcc" field so visible to all
DB2022029	Housing Neighbourhood	Y	N	Inappropriate Action by Staff	Corrective Action	Email address of supplier shared without consent

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
	and Building Services					
DB2022030	Corporate Services	Y	N	System Error	Corrective Action	Staff member's personal phone number visible on Outlook in error due to data entry on Fusion
DB2022031	Finance and Resources	Y	N	System Error	Corrective Action	Council tax letter mis-delivered to wrong address by Royal mail
DB2022032	Corporate Services	Y	N	Human Error	Corrective Action	Pedestal removed for recycling with paper notes inside.
DB2022033	Children, Families and Education	Y	N	Human Error	Corrective Action	Staff File left in meeting room overnight
DB2022034	Finance and Resources	Y	N	System Error	Corrective Action	Council tax bill issued to the wrong address
DB2022035	Children, Families and Education	Y	N	Human Error	Corrective Action	Personal data shared with multiple schools in error
DB2022036	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Allegation of over-sharing of information with another council department
DB2022037	Public Health	Y	N	Human Error	Corrective Action	Email sent to wrong internal mailing list
DB2022038	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Personal details in Outlook calendar can be seen by all staff.
DB2022039	Children, Families and Education	N	N	Human Error	Corrective Action	Personal supervision file left overnight in meeting room in Civic Offices
DB2022040	Children, Families and Education	Y	N	Human Error	Corrective Action	Letters sent to recipient's previous address in error

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
005.03.2022	Adult Social Care	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
006.03.2022	Adult Social Care	N	N	Human Error	Corrective Action	Documents sent to wrong address due to recipient providing wrong details
DB2022041	Corporate Services	Y	N	Human Error	Corrective Action	Incorrect permissions granted in Fusion allowing 4 members of school staff to view staff information relating to another school
DB2022042	Regeneration	Y	N	Human Error	Corrective Action	Vehicle license documents sent to wrong internal mailing list
DB2022043	Children, Families and Education	N	N	Inappropriate Action by Staff	Disciplinary Action	Member of staff accessed records without a business need to.
DB2022044	Finance and Resources	N	N	Inappropriate Action by Staff	Corrective Action	Personal details in Outlook calendar can be seen by all staff.
007.04.2022	Adult Social Care	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022045	Regeneration	N	N	Human Error	Corrective Action	PCN sent to the wrong address
DB2022046	Corporate Services	Y	N	Human Error	Corrective Action	Attachment containing confidential information included in error in email sent to IT service desk.
DB2022047	Children, Families and Education	N	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022048	Regeneration	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022049	Children, Families and Education	Y	N	Human Error	Corrective Action	Meeting invitation sent to wrong recipient
DB2022050	Children, Families and Education	Y	N	Human Error	Corrective Action	Email 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
DB2022051	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022052	Corporate Services	N	N	Human Error	Revised Process	Letter sent to parents containing name of the wrong child
DB2022053	Regeneration	N	N	Human Error	Revised Process	Penalty charge notice with name of vehicle keeper sent to the wrong vehicle keeper
DB2022054	Regeneration	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022055	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022056	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022057	Finance and Resources	Y	N	System Error	Corrective Action	Incorrect login details provided to staff member for Fusion enabling them to access someone else's account
DB2022058	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Mobile phone given to student contained previous users contacts
DB2022059	Corporate Services	Y	N	Inappropriate Action by Staff	Corrective Action	P60 sent to employee's manager in error
DB2022060	Finance and Resources	Y	N	System Error	Corrective Action	Council tax email sent with incorrect name and council tax reference number.
DB2022061	Children, Families and Education	Y	N	Human Error	Corrective Action	Long term absence letter sent to spouse's place of work.

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022062	Children, Families and Education	Y	N	Inappropriate Action by Staff	Disciplinary Action	Member of staff employed by contractor inappropriately accessed records
DB2022063	Corporate Services	Y	N	Inappropriate Action by Staff	Disciplinary Action	Family member of employee appears to have accessed council laptop
DB2022064	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022065	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Tenant information viewed by another tenant accidentally at the Housing Office
DB2022066	Finance and Resources	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022067	Children, Families and Education	N	N	Inappropriate Action by Staff	Disciplinary Action	Confidential information disclosed to other family members during a child protection assessment
DB2022068	Children, Families and Education	Y	N	Human Error	Corrective Action	Foster carer's details emailed to professionals in error
DB2022069	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022070	Children, Families and Education	Y	N	System Error	Corrective Action	Email sent to wrong recipient
DB2022071	Corporate Services	N	N	Human Error	Revised Process	Education letter included wrong child's name in letter heading
DB2022072	Housing Neighbourhood	Y	N	Human Error	Corrective Action	Email sent to wrong internal recipients

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
	and Building Services					
DB2022073	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022074	Regeneration	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022075	Finance and Resources	N	N	Human Error	Revised Process	Email sent to wrong recipient
DB2022076	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Letter issued with certificate with wrong name and address
DB2022077	Children, Families and Education	N	N	Human Error	Corrective Action	Child in need plan sent to a former partner's address in error
DB2022078	Regeneration	Y	N	Human Error	Corrective Action	Incorrect vehicle registration number inserted in a penalty charge notice (PCN) response
DB2022079	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Allegation of personal data being disclosed by a member of staff to a resident (unfounded)
DB2022080	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Corrective Action	Staff login alleged to have been shared (unfounded)
DB2022081	Housing Neighbourhood and Building Services	N	N	Human Error	Corrective Action	Name and address of people commenting on planning application who asked to remain anonymous published in error
DB2022082	Children, Families and Education	Y	N	Human Error	Corrective Action	Email 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
DB2022083	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022084	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB8022085	Finance and Resources	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB8022086	Children, Families and Education	Y	N	Human Error	Corrective Action	PCC mobile phone lost

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.