



Portsmouth
CITY COUNCIL

Data Security Incident Report
September 2022 to February 2023

Executive Summary

This report has been prepared to provide an update on data breach incidents for the period Wednesday, September 14, 2022, to Thursday, February 23, 2023.

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

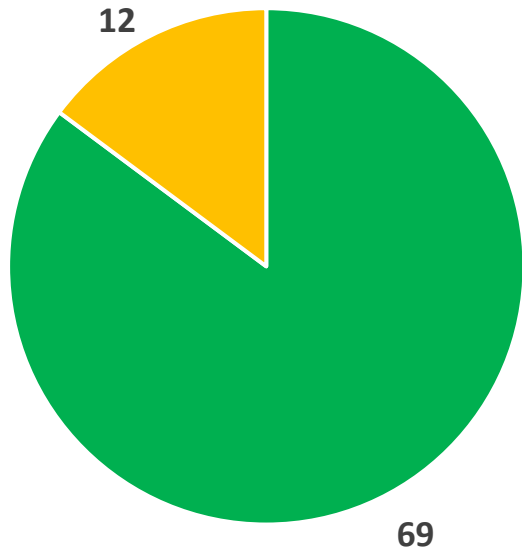
The Council's response to potential data breaches is managed by a central team, following the stages summarised below:

- 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 81 data breaches, 69 being notified to the central team in under 72 hours and 0 requiring notification to the ICO.

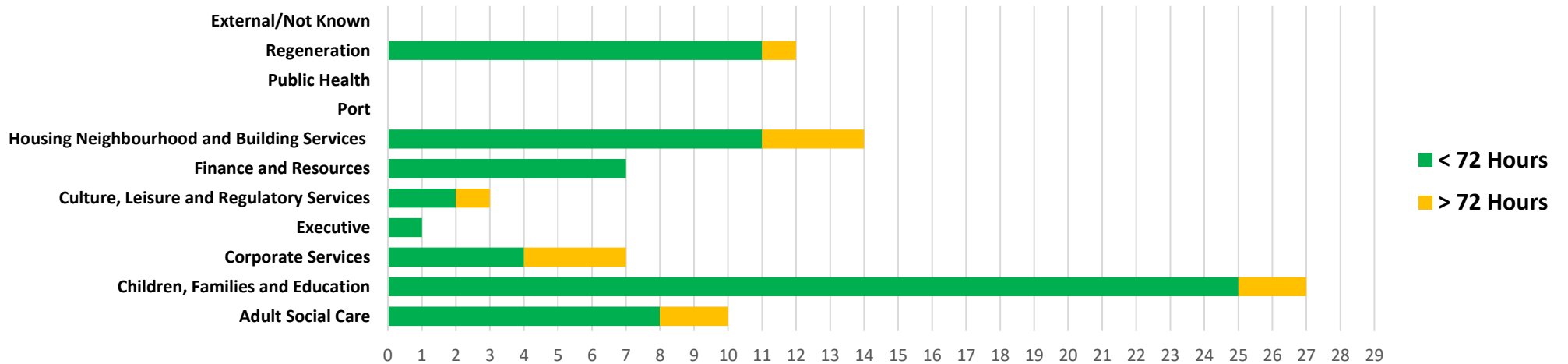
A detailed breakdown of data breaches summarised herein is provided at the end of the report.

Response Time

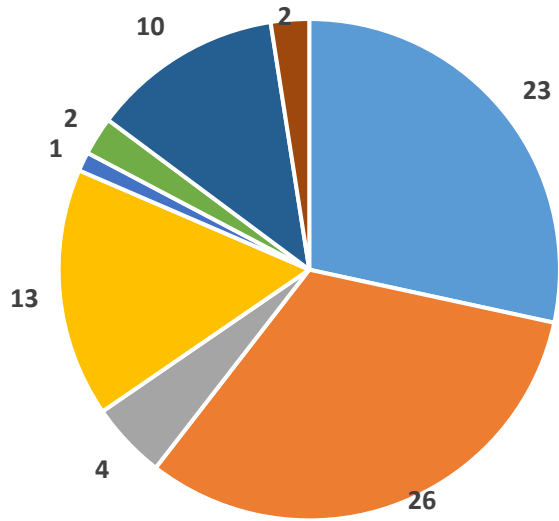


	< 72 hours	> 72 hours	TOTAL
Adult Social Care	8	2	10
Children, Families and Education	25	2	27
Corporate Services	4	2	6
Executive	1	0	1
Culture, Leisure and Regulatory Services	2	1	3
Finance and Resources	7	0	7
Housing Neighbourhood and Building Services	11	3	14
Port	0	0	0
Public Health	0	0	0
Regeneration	11	1	12
External/Not Known	0	0	0
TOTAL	69	12	81

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.

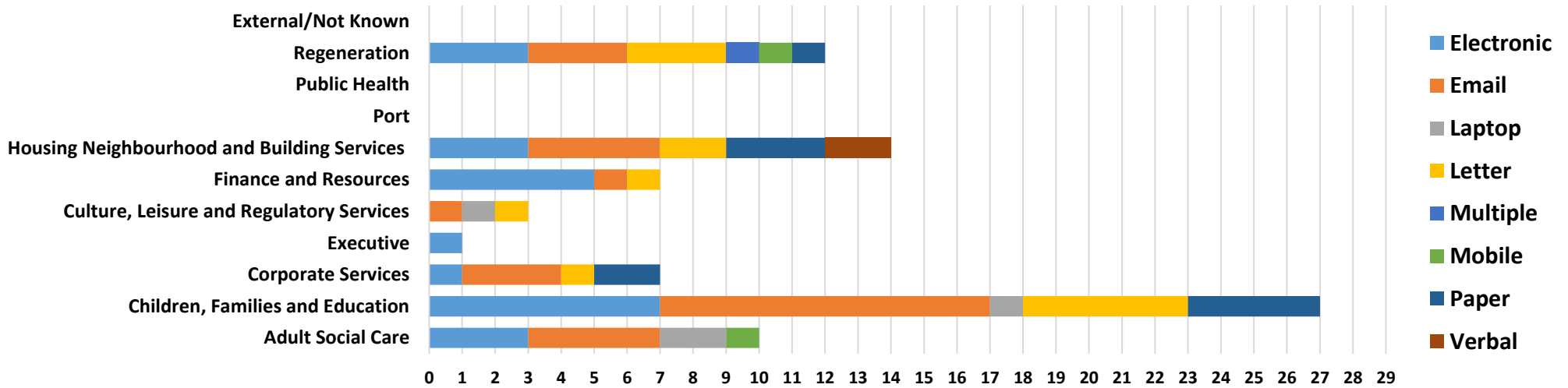


Medium

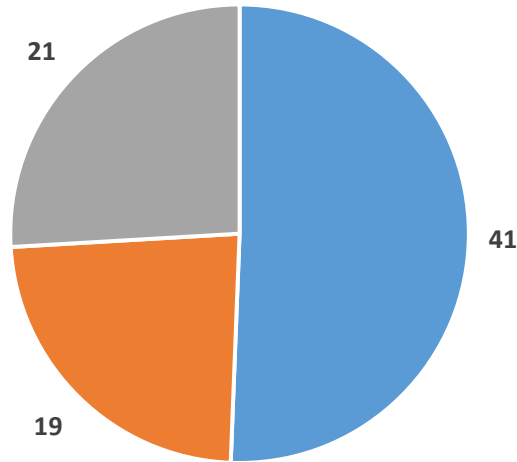


	Electronic	Email	Laptop	Letter	Multiple	Mobile	Paper	Verbal	TOTAL
Adult Social Care	3	4	2	0	0	1	0	0	10
Children, Families and Education	7	10	1	5	0	0	4	0	27
Corporate Services	1	3	0	1	0	0	2	0	7
Executive	1	0	0	0	0	0	0	0	1
Culture, Leisure and Regulatory Services	0	1	1	1	0	0	0	0	3
Finance and Resources	5	1	0	1	0	0	0	0	7
Housing Neighbourhood and Building Services	3	4	0	2	0	0	3	2	14
Port	0	0	0	0	0	0	0	0	0
Public Health	0	0	0	0	0	0	0	0	0
Regeneration	3	3	0	3	1	1	1	0	12
External/Not Known	0	0	0	0	0	0	0	0	0
TOTAL	23	26	4	13	1	2	10	2	81

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.

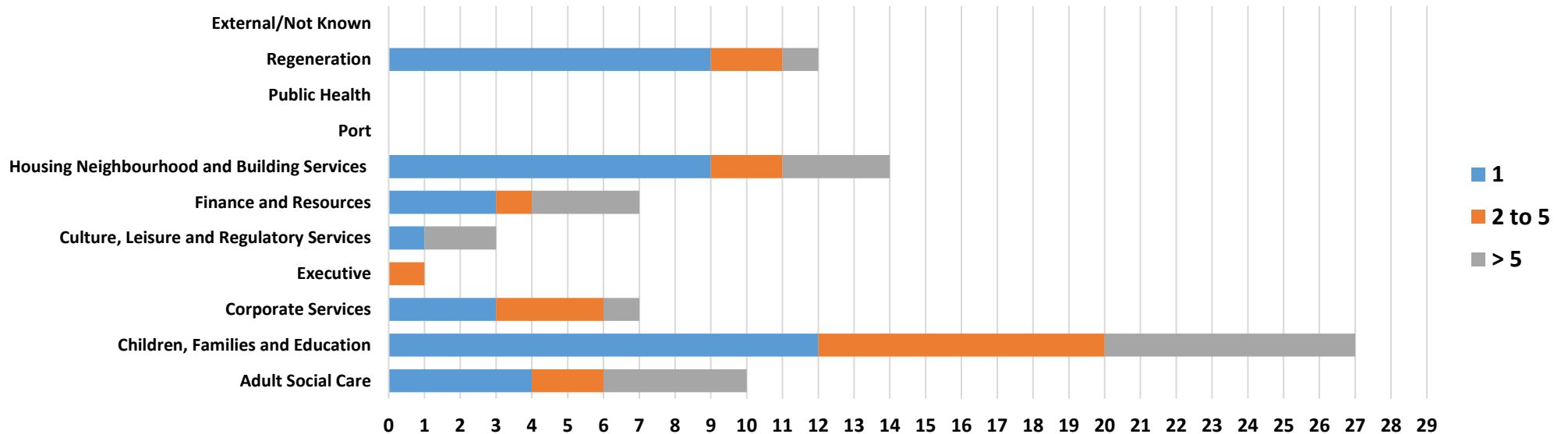


Number Impacted

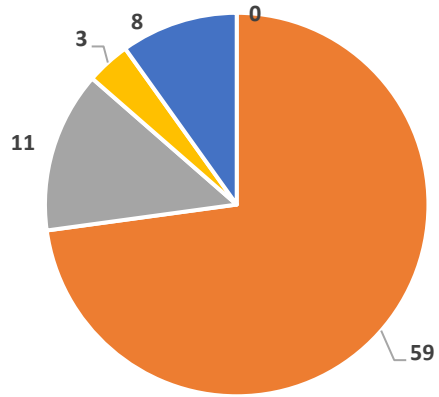


	1	2 to 5	> 5	TOTAL
Adult Social Care	4	2	4	10
Children, Families and Education	12	8	7	27
Corporate Services	3	3	1	7
Executive	0	1	0	1
Culture, Leisure and Regulatory Services	1	0	2	3
Finance and Resources	3	1	3	7
Housing Neighbourhood and Building Services	9	2	3	14
Port	0	0	0	0
Public Health	0	0	0	0
Regeneration	9	2	1	12
External/Not Known	0	0	0	0
TOTAL	41	19	21	81

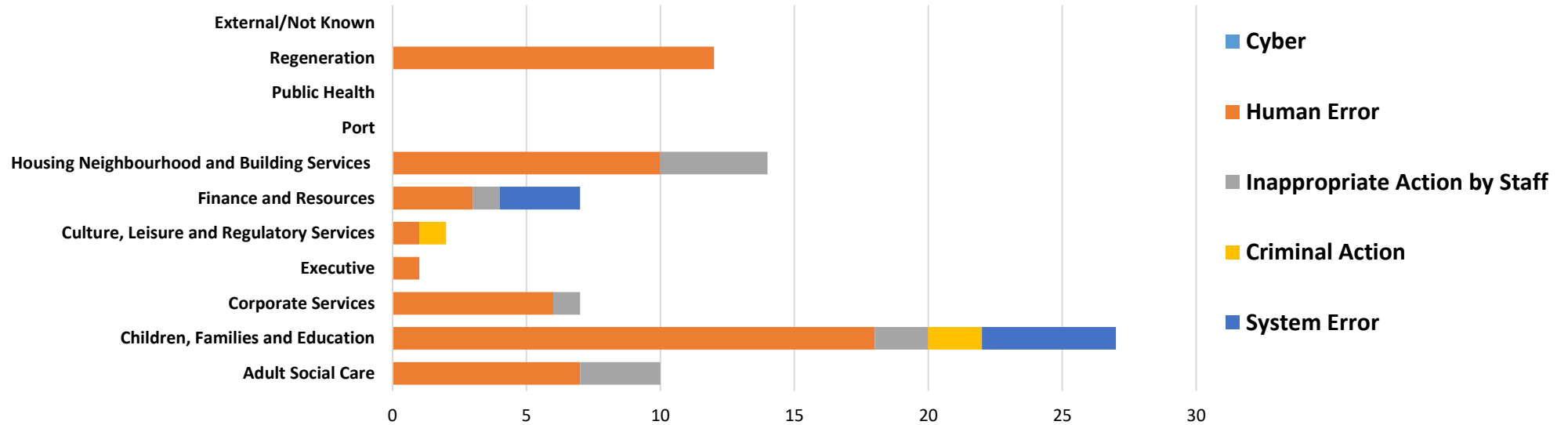
Totals refer to the number of individuals either confirmed or likely to have been impacted.



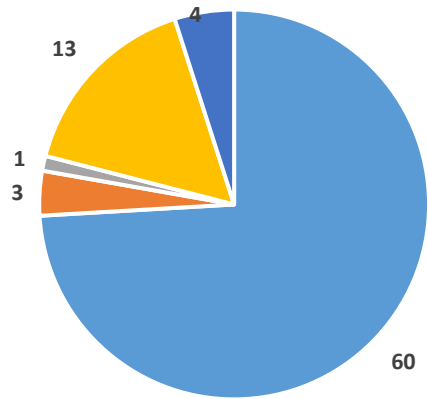
Root Cause



	Cyber	Human Error	Inappropriate Action by Staff	Criminal Action	System Error	TOTAL
Adult Social Care	0	8	3	0	0	10
Children, Families and Education	0	18	2	2	5	27
Corporate Services	0	6	1	0	0	7
Executive	0	1	0	0	0	1
Culture, Leisure and Regulatory Services	0	1	0	1	0	2
Finance and Resources	0	3	1	0	3	7
Housing Neighbourhood and Building Services	0	10	4	0	0	14
Port	0	0	0	0	0	0
Public Health	0	0	0	0	0	0
Regeneration	0	12	0	0	0	12
External/Not Known	0	0	0	0	0	0
TOTAL	0	59	11	3	8	81

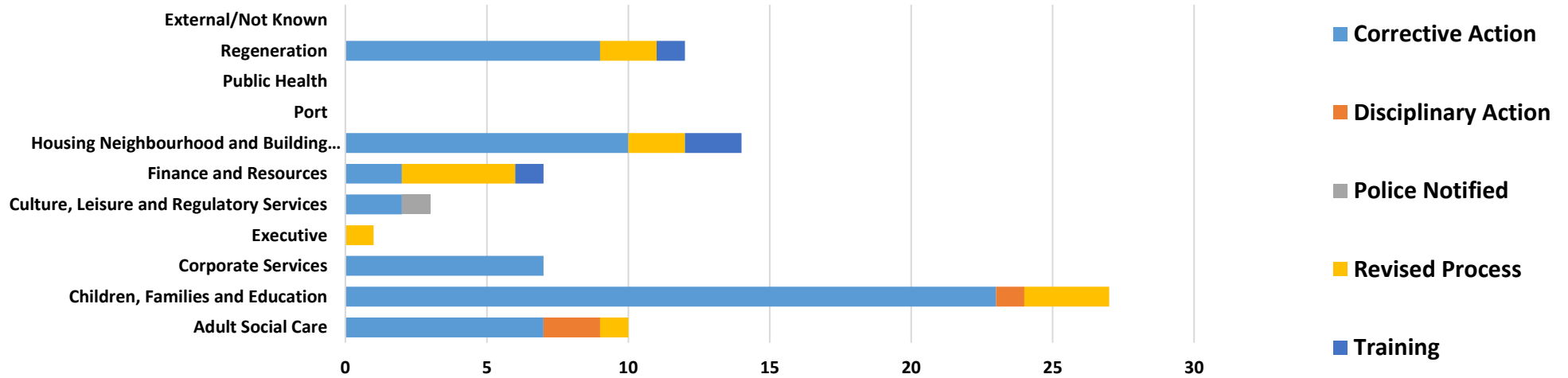


Action Taken



	Corrective Action	Disciplinary	Police Notified	Revised Process	Training	TOTAL
Adult Social Care	7	2	0	1	0	10
Children, Families and Education	23	1	0	3	0	27
Corporate Services	7	0	0	0	0	7
Executive	0	0	0	1	0	1
Culture, Leisure and Regulatory Services	2	0	1	0	0	3
Finance and Resources	2	0	0	4	1	7
Housing Neighbourhood and Building Services	10	0	0	2	2	14
Port	0	0	0	0	0	0
Public Health	0	0	0	0	0	0
Regeneration	9	0	0	2	1	12
External/Not Known	0	0	0	0	0	0
TOTAL	60	3	1	13	4	81

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



Quarterly Trends- 2022

Number of Data Security Breaches by Directorate

	Q1	Q2	Q3	Q4	Total
Adult Social Care	1	0	1	6	8
Children, Families and Education	14	12	10	13	51
Corporate Services	5	3	3	5	16
Culture, Leisure and Regulatory Services	0	0	0	1	1
Executive	0	0	0	0	0
Finance and Resources	3	7	1	4	15
Housing Neighbourhood and Building Services	2	11	5	5	23
Public Health	1	0	0	0	1
Regeneration	5	3	1	7	16

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
DB2022098	Housing Neighbourhood and Building Services	Y	N	Human Error	Training	PCC device missing after being in locker for 2 weeks
DB2022099	Finance and Resources	Y	N	Human Error	Training	Email sent to incorrect email address
DB2022102	Children, Families and Education	Y	N	Human Error	Revised Process	Police report misfiled and included in reports for childcare conference
DB2022103	Housing Neighbourhood and Building Services	N	N	Human Error	Corrective Action	Letter to housing benefit claimant sent to their former address and opened by landlord
DB2022104	Regeneration	N	N	Human Error	Corrective Action	Telephone number not redacted from objection on planning portal.
DB2022105	Housing Neighbourhood and Building Services	Y	N	Human Error	Multiple	Bin bag found in car park of housing office containing notebook and forms with some personal data on
DB2022106	Corporate Services	Y	N	Human Error	Corrective Action	Documents emailed to wrong internal recipient
DB2022107	Housing Neighbourhood and Building Services	N	N	Human Error	Corrective Action	Letter set to incorrect address

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022108	Children, Families and Education	Y	N	System Error	Multiple	Safe containing belongings for Looked After Children not kept secure.
DB2022109	Children, Families and Education	Y	N	Human Error	Multiple	Email sent to incorrect mailing list and with all recipients in the "to" field.
DB2022110	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong internal email address
DB2022111	Children, Families and Education	N	N	Human Error	Corrective Action	Email sent to incorrect member of staff (with the same name as the correct member of staff)
DB2022112	Children, Families and Education	Y	N	Human Error	Corrective Action	Lost mobile phone.
DB2022113	Regeneration	Y	N	Human Error	Corrective Action	Bus lane PCN printer set to print both sides in error. PCN sent with another on the reverse.
DB2022114	Adult Social Care	Y	N	Human Error	Corrective Action	Photograph of care home resident published in the News and on social media without consent
DB2022115	Housing Neighbourhood and Building Services	N	N	Human Error	Corrective Action	Member of staff set up corporate phone as a personal phone. Work contacts shared to personal Gmail account.
DB2022116	Children, Families and Education	Y	N	Human Error	Corrective Action	Notebook left at the home of a service user who threatened to disclose the personal information it contained via social media
DB2022117	Children, Families and Education	Y	N	Human Error	Corrective Action	Letter to a child's father with no parental responsibility.
DB2022118	Executive	Y	N	Human Error	Revised Process	Home addresses of two councillors published in error in connection with declaration of interests

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022119	Corporate Services	N	N	Inappropriate Action by Staff	Multiple	Member of staff left the council and did not return laptop
DB2022120	Finance and Resources	Y	N	System Error	Revised Process	Remittance Advices sent to incorrect address due to change of address not being actioned.
DB2022121	Housing Neighbourhood and Building Services	Y	N	Human Error	Revised Process	Email sent to incorrect recipient
DB2022122	Finance & Resources	Y	N	System Error	Revised Process	Payroll receiving bogus change of band detail requests for various employees
DB2022123	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong school
DB2022124	Children, Families and Education	Y	N	Human Error	Multiple	Data Subject Access Request included information relating to another person in error.
DB2022125	Children, Families and Education	Y	N	Human Error	Corrective Action	Letter sent to incorrect address
DB2022126	Children, Families and Education	Y	N	System Error	Multiple	Overpayment invoice and BACs remittances and final demand for payment for foster carer sent to old address.
DB2022127	Children, Families and Education	Y	N	Human Error	Revised Process	Paperwork left at service user's home in error
DB2022128	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Corrective Action	Allegation of breach of confidentiality by a member of staff disclosing information to a resident's neighbour.
DB2022129	Corporate Services	N	N	Human Error	Corrective Action	Email sent to wrong internal email address

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022130	Adult Social Care	Y	N	Inappropriate Action by Staff	Disciplinary Action	Unauthorised disclosure of personal and falsified information to the Office of the Public Guardian
DB2022131	Adult Social Care	Y	N	Inappropriate Action by Staff	Disciplinary Action	Unauthorised access to records in SystemOne (Adult Social Care case management system)
DB2022132	Regeneration	Y	N	Human Error	Corrective Action	Email sent to incorrect recipient
DB2022133	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Incorrect document attached to email and sent to resident
DB2022134	Children, Families and Education	Y	N	System Error	Corrective Action	Data uploaded to CSC Sentinel Database from Health records contained confidential addresses of children. Information was then available to schools in error
DB2022135	Adult Social Care	Y	N	Human Error	Corrective Action	Care and lifting plan sent to wrong care home
DB2022136	Regeneration	Y	N	Human Error	Corrective Action	Payment receipt emailed to the wrong person
DB2022137	Children, Families and Education	Y	N	System Error	Corrective Action	3 users of Schools Secure Environment given incorrect access to system so could see all schools' files
DB2022138	Finance and Resources	Y	N	System Error	Multiple	Talent Pool data visible to all PCC hiring managers in Fusion in error
DB2022139	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Bitlocker code and log-in details written down and stuck to PCC laptop
DB2022140	Housing Neighbourhood and Building Services	Y	N	Human Error	Revised Process	Email sent to wrong address of someone with the same name as the intended recipient
DB2022141	Finance and Resources	Y	N	Inappropriate Action by Staff	Revised Process	Inappropriate access to system used to reset staff members password

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022142	Children, Families and Education	Y	N	Criminal Action	Multiple	Letter concerning a child's placement posted on social media by a parent
DB2022143	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email addresses included in "to" field in error so visible to all recipients
DB2022144	Children, Families and Education	Y	N	System Error	Corrective Action	Data sent to schools included pupil location data for other schools.
DB2022145	Children, Families and Education	Y	N	Criminal Action	Multiple	Laptop stolen from boot of staff member's car
DB2022146	Corporate Services	Y	N	Human Error	Corrective Action	PCC staff member's contract sent to their former line manager in error
DB2023001	Children, Families and Education	N	N		Corrective Action	Letter sent to wrong address and returned opened
DB2023002	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipients
DB2023003	Corporate Services	Y	N	Human Error	Corrective Action	Bus pass sent to incorrect address
DB2023004	Children, Families and Education	Y	N	Human Error	Corrective Action	Letter sent to incorrect address and returned as 'not at this address'
DB2023005	Regeneration	Y	N	Human Error	Corrective Action	Signatures unredacted from legal agreement on planning portal information
DB2023007	Regeneration	Y	N	Human Error	Multiple	Lost PCC mobile phone (PIN protected)

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2023008	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Training	Verbal breach of confidentiality. Information about one family member disclosed to another
DB2023009	Adult Social Care	N	N	Human Error	Corrective Action	Lost PCC mobile phone (PIN protected)
DB2023010	Regeneration	Y	N	Human Error	Revised Process	Penalty Charge Notice sent to the wrong person
DB2023011	Finance and Resources	Y	N	Human Error	Revised Process	Payroll information sent to the wrong school
DB2023012	Culture, Leisure and Regulatory Services	N	N	Human Error	Multiple	Planning permission objections wrongfully disclosed to applicants.
DB2023013	Regeneration	Y	N	Human Error	Corrective Action	Penalty charge notice sent to wrong address
DB2023014	Children, Families and Education	Y	N	Human Error	Corrective Action	Email intended for health visitor sent to a parent by mistake
DB2023015	Adult Social Care	Y	N	Human Error	Revised Process	Emails sent to wrong recipients
DB2023016	Corporate Services	N	N	Human Error	Corrective Action	Unable to retrieve PCC laptop from building due to serious structural damage
DB2023017	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Multiple	Corporate device not wiped or re-setup before being reallocated
DB2023018	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Letter intended for a landlord sent to the wrong address
DB2023019	Culture, Leisure and Regulatory Services	Y	N	Criminal Action	Police Notified	Laptop stolen from staff member's car

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2023020	Corporate Services	Y	N	Human Error		Lost business card with resident's details noted on it
DB2023021	Regeneration	Y	N	Human Error	Multiple	Two incorrect Vehicle Registration Numbers recorded by ANPR cameras and sent to the DVLA. Penalty Charge Notice sent to the wrong person.
DB2023022	Regeneration	Y	N	Human Error	Multiple	Planning enforcement email sent to wrong recipient
13.11.2022	Adult Social Care	Y	N	Human Error	Corrective Action	Email relating to client sent to incorrect care agency
14.12.2022	Adult Social Care	N	N	Inappropriate Action by Staff	Corrective Action	Worker inappropriately accessed SystemOne
15.12.2022	Adult Social Care	Y	N	Human Error	Corrective Action	Email sent to incorrect email address.
16.12.2022	Adult Social Care	Y	N	Human Error	Corrective Action	Note entered onto wrong client record within SystemOne
DB2023023	Children, Families and Education	Y	N	Human Error	Revised Process	Letter sent out to various recipients with incorrect name copied as a reference
DB2023024	Children, Families and Education	Y	N	Human Error	Corrective Action	Email with pupil name sent to the wrong school
DB2023025	Finance and Resources	Y	N	Human Error	Corrective Action	2 letters inserted into an envelope in error resulting in an incorrect letter being sent to a resident.
DB2023026	Regeneration	Y	N	Human Error	Revised Process	Incorrect Vehicle Registration Number recorded so incorrect details sought from DVLA & Notice to Owner sent to wrong person
DB2023027	Regeneration	Y	N	Human Error	Training	Parking email sent to city helpdesk with incorrect details on.
DB2023028	Housing Neighbourhood	Y	N	Inappropriate Action by Staff	Multiple	Laptop and paperwork stolen from boot of car

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					
DB2023029	Culture, Leisure and Regulatory Services	Y	N		Corrective Action	Leisure card posted to incorrect address
DB2023030	Children, Families and Education	Y	N	Human Error	Corrective Action	Email shared with incorrect recipients
DB2023031	Children, Families and Education	Y	N	Inappropriate Action by Staff	Disciplinary Action	Log-in details written on post-it note and stuck to laptop.

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 comment's 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.