



Data Security Incident Report
28 February to 31 August 2023

Executive Summary

This report has been prepared to provide an update on data breach incidents for the period from Thursday 28 February 2023 to Thursday 31 August 2023.

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.

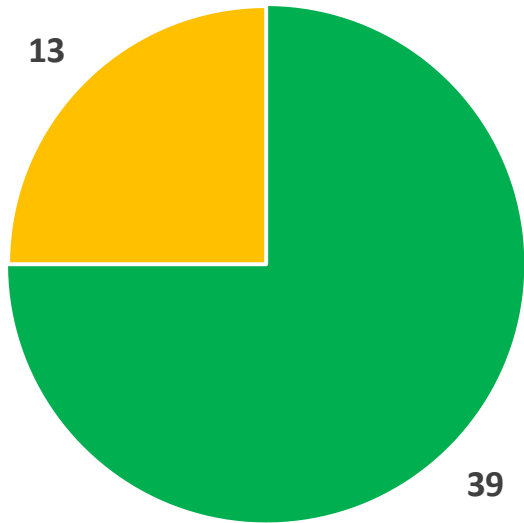
The Council's response to potential data breaches is managed by a central team, following the stages summarised below:

- 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 52 data breaches. In 13 instances, the breach was not reported to the Corporate Information Governance Team within the required 72 hours although none of these reached the threshold for reporting to the Information Commissioner's Office. All staff will be reminded of the importance of reporting incidents immediately even if the full details are not known at the time.

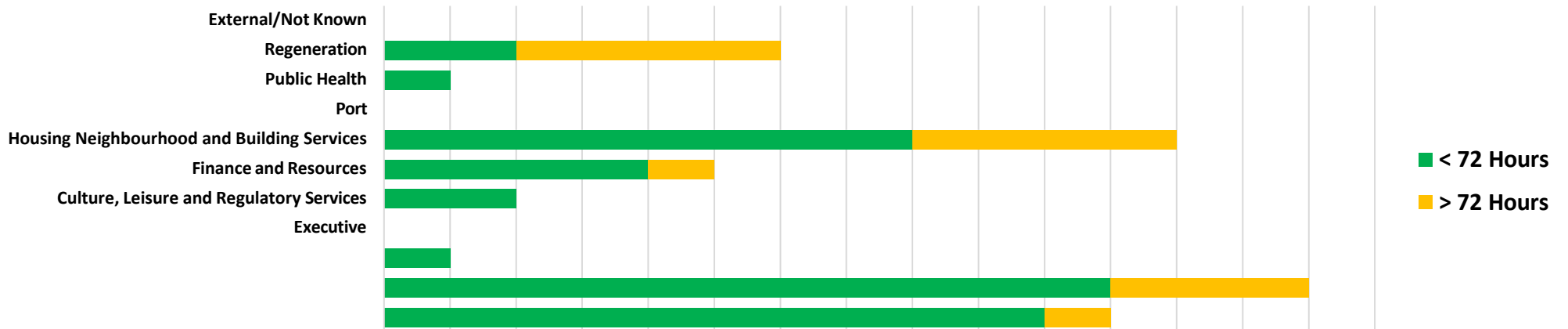
A detailed breakdown of data breaches for this period is provided at the end of this report.

Response Time

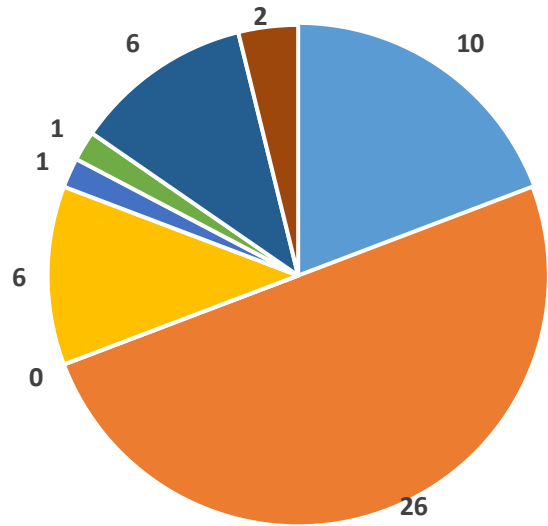


	< 72 hours	> 72 hours	TOTAL
Adult Social Care	10	1	11
Children, Families and Education	11	3	14
Corporate Services	1	0	1
Executive	0	0	0
Culture, Leisure and Regulatory Services	2	0	2
Finance and Resources	4	1	5
Housing Neighbourhood and Building Services	8	4	12
Port	0	0	0
Public Health	1	0	1
Regeneration	2	4	6
External/Not Known	0	0	0
TOTAL	39	13	52

Response time is the time taken for the central team to be notified by the service within which the breach has taken place. Article 33 of the UK GDPR states that, if a breach is reportable to the Information Commissioner's Office, it must be reported within 72 hours of discovery.

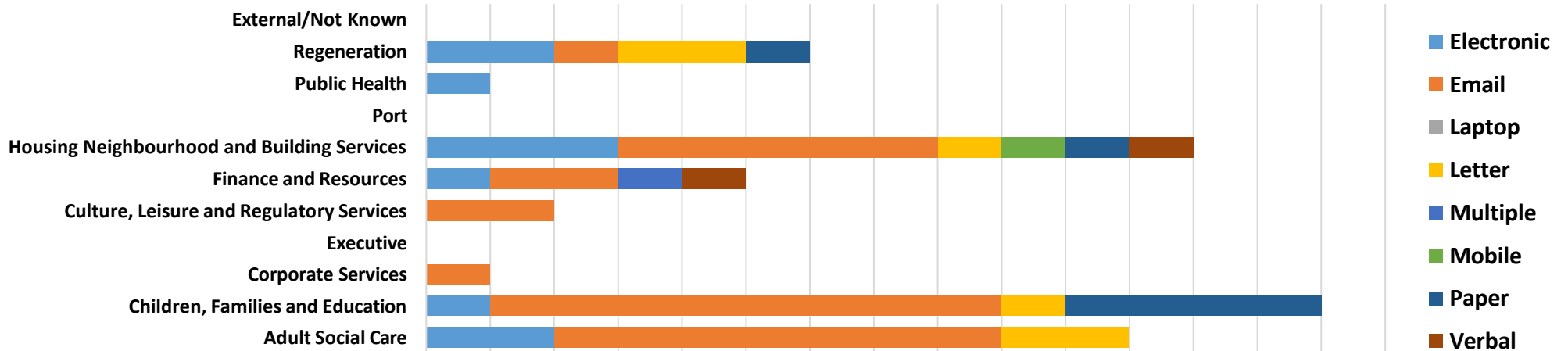


Medium

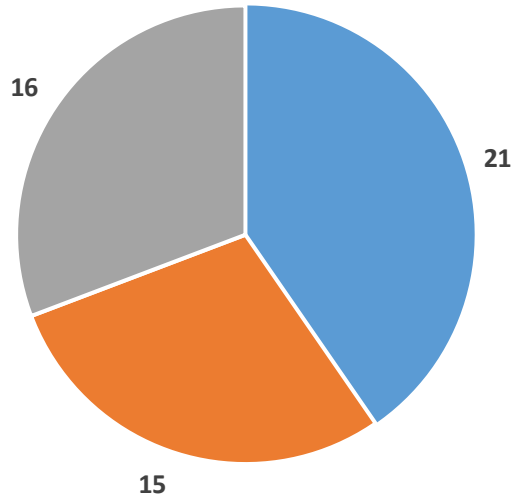


	Electronic	Email	Laptop	Letter	Multiple	Mobile	Paper	Verbal	TOTAL
Adult Social Care	2	7	0	2	0	0	0	0	11
Children, Families and Education	1	8	0	1	0	0	4	0	14
Corporate Services	0	1	0	0	0	0	0	0	1
Executive	0	0	0	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	2	0	0	0	0	0	0	2
Finance and Resources	1	2	0	0	1	0	0	1	5
Housing Neighbourhood and Building Services	3	5	0	1	0	1	1	1	12
Port	0	0	0	0	0	0	0	0	0
Public Health	1	0	0	0	0	0	0	0	1
Regeneration	2	1	0	2	0	0	1	0	6
External/Not Known	0	0	0	0	0	0	0	0	0
TOTAL	10	26	0	6	1	1	6	2	52

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.

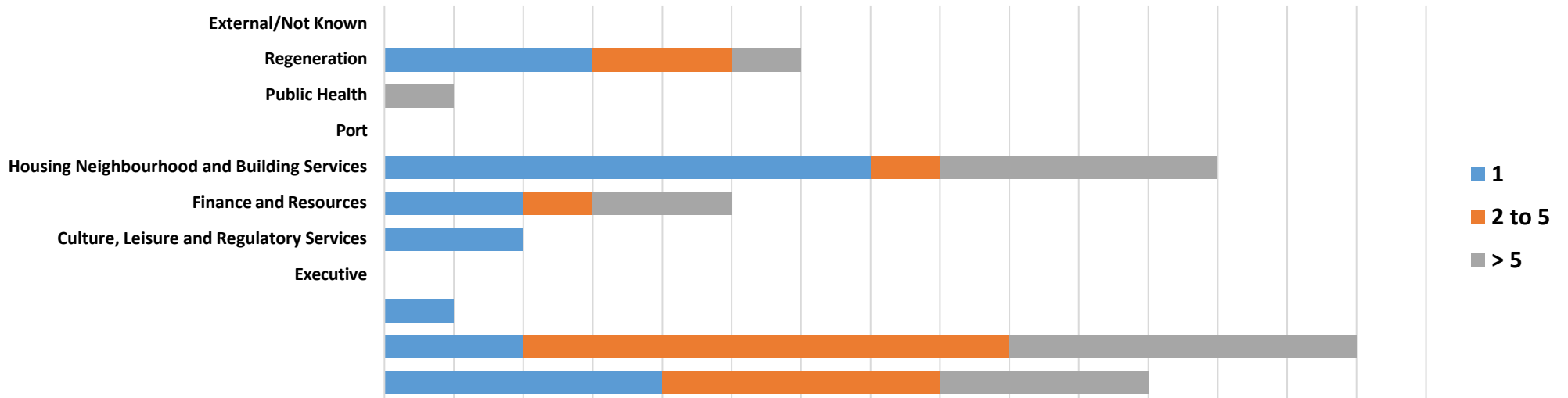


Number Impacted

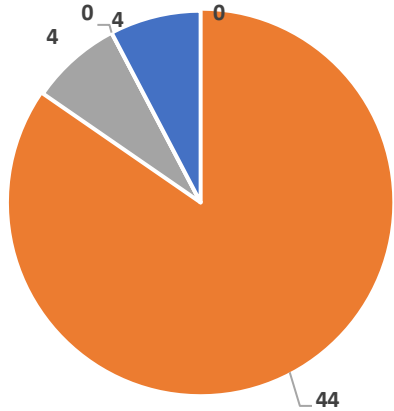


	1	2 to 5	> 5	TOTAL
Adult Social Care	4	4	3	11
Children, Families and Education	2	7	5	14
Corporate Services	1	0	0	1
Executive	0	0	0	0
Culture, Leisure and Regulatory Services	2	0	0	2
Finance and Resources	2	1	2	5
Housing Neighbourhood and Building Services	7	1	4	12
Port	0	0	0	0
Public Health	0	0	1	1
Regeneration	3	2	1	6
External/Not Known	0	0	0	0
TOTAL	21	15	16	52

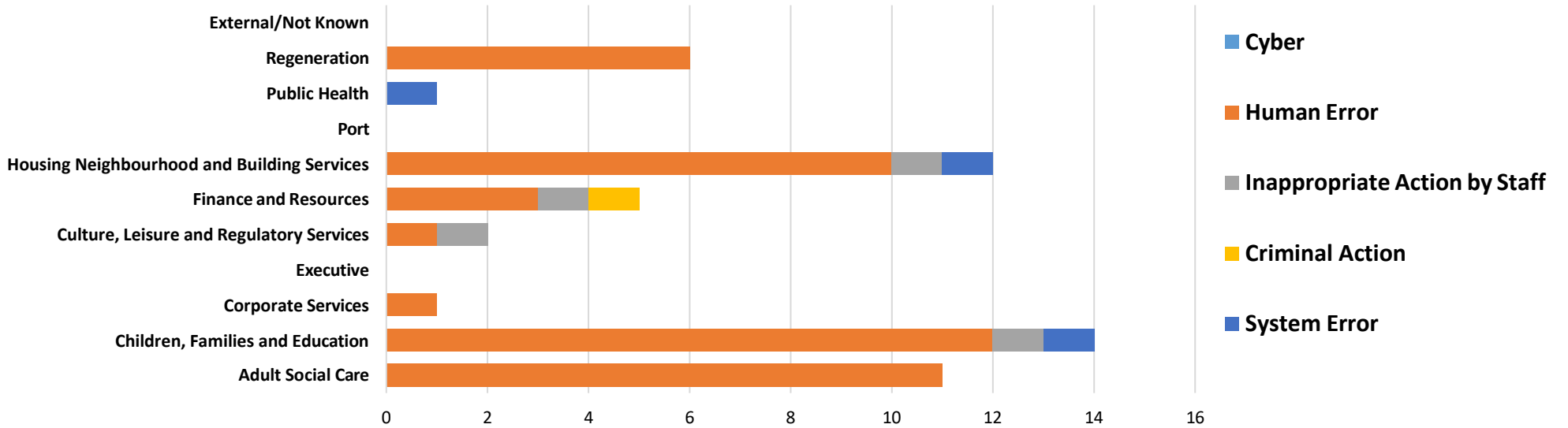
Totals refer to the number of individuals either confirmed or likely to have been impacted.



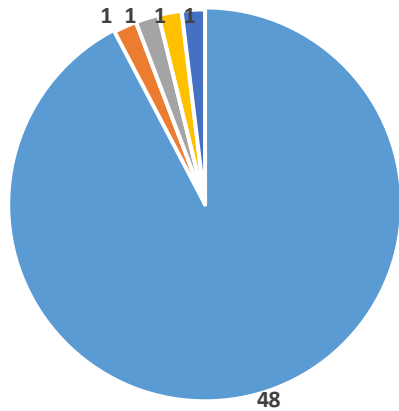
Root Cause



	Cyber	Human Error	Inappropriate Action by Staff	Criminal Action	System Error	TOTAL
Adult Social Care	0	11	0	0	0	11
Children, Families and Education	0	12	1	0	1	14
Corporate Services	0	1	0	0	0	1
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	1	1	0	0	2
Finance and Resources	0	3	1	0	1	5
Housing Neighbourhood and Building Services	0	10	1	0	1	12
Port	0	0	0	0	0	0
Public Health	0	0	0	0	1	1
Regeneration	0	6	0	0	0	6
External/Not Known	0	0	0	0	0	0
TOTAL	0	44	4	0	4	52

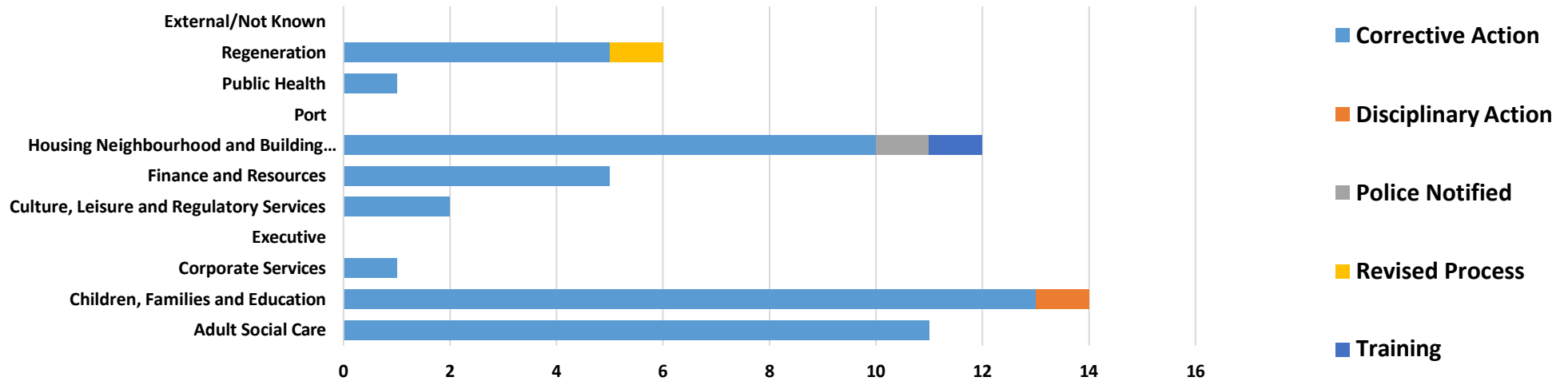


Action Taken



	Corrective Action	Disciplinary	Police Notified	Revised Process	Training	TOTAL
Adult Social Care	11	0	0	0	0	11
Children, Families and Education	13	1	0	0	0	14
Corporate Services	1	0	0	0	0	1
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	2	0	0	0	0	2
Finance and Resources	5	0	0	0	0	5
Housing Neighbourhood and Building Services	10	0	1	0	1	12
Port	0	0	0	0	0	0
Public Health	1	0	0	0	0	1
Regeneration	5	0	0	1	0	6
External/Not Known	0	0	0	0	0	0
TOTAL	48	1	1	1	1	52

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



Data Breaches Summary

Reference No.	Response in 72 Hours	Directorate	Root Cause	Action	Reported To ICO	Comments, including detail where a breach spans multiple mediums
DB2023034	Y	Children, Families and Education	Human Error	Corrective Action	No	Minutes and plan for 3 Children in Need sent to the wrong staff member Information breached includes; Personal and special category
DB2023035	N	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Wrong child's name included in a housing letter Information breached includes; Personal - child's name
DB2023036	Y	Children, Families and Education	Human Error	Corrective Action	No	Email correspondence concerning a child's assessment. Email from parent sent to an unknown email Solent University address a Solent NHS Trust address Information breached includes; Personal and special category, child's name, parent's names, child's health needs
DB2023037	Y	Culture, Leisure and Regulatory Services	Human Error	Corrective Action	No	Email sent to the wrong person Information breached includes; Patient record cards from 70 years ago
DB2023038	N	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Enquiries form sent via email in error. Information breached includes; Personal - housing and living circumstances but no individual names
DB2023039	Y	Finance and Resources	Human Error	Training	No	Council tax customer alleged breach of confidentiality Information breached includes; Personal - financial circumstances
DB2023040	N	Children, Families and Education	Human Error	Multiple	No	Email sent to wrong Hampshire County Council email address Information breached includes; Personal and special category - children's social care assessment
DB2023041	N	Regeneration	Human Error	Corrective Action	No	Bus Lane Penalty Charge Notice (PCN) sent to wrong keeper Information breached includes; Personal - name, vehicle registration, bus lane infringement

DB2023042	N	Children, Families and Education	Human Error	Corrective Action	No	Email sent to school principal in error Information breached includes; Personal -names address and special category - client finances and police involvement
DB2023043	Y	Corporate Services	Human Error	Corrective Action	No	Email sent to an NHS email address in error Information breached includes; Personal - PCC tenant's name and address
DB2023044	Y	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Email sent to wrong PCC email address Information breached includes; Personal - staff name and pay grade
DB2023045	Y	Children, Families and Education	System Error	Corrective Action	No	Calling sheet sent to the wrong GP address Information breached includes; Personal - Names, DOBs, addresses and e-mail addresses
DB2023046	Y	Children, Families and Education	Human Error	Corrective Action	No	Email sent to all childcare providers containing the email addresses in the "to" box rather than the " BCC" box. Information breached includes; Personal - email addresses
DB2023047	Y	Finance and Resources	Human Error	Corrective Action	No	A spreadsheet tracker detailing money/savings held by PCC on behalf of looked after children (current and historic) has been shared with an outside party by mistake. Information breached includes; Personal and special Category -names and looked after status of children and young people

DB2023048	Y	Children, Families and Education	System Error	Corrective Action	No	Letter sent to wrong address and returned partially open Information breached includes; names, DOB, addresses, family Circumstances and actions required
DB2023049	N	Regeneration	Human Error	Corrective Action	No	Incorrect registration input into system meaning we requested data from DVLA that we did not need and therefore were not entitled to Information breached includes; PCN Number, VRM, date, time and location of incident
DB2023050	N	Regeneration	Human Error	Corrective Action	No	Meeting invite sent to staff about external Training including an incorrect External recipient with the same name as a staff member Information breached includes; Work e-mail address and full names of 9 members of staff
DB2023051	Y	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Notepad misplaced by member of staff Information breached includes; Contact details for PCC staff and other organisations
DB2023052	Y	Children, Families and Education	Human Error	Corrective Action	No	Child In Need (CIN) plan included in envelope with another family's CIN plan Information breached includes; Names, DOBs, telephone number
DB2023053	Y	Regeneration	Human Error	Corrective Action	No	Incorrect Vehicle Registration Number (VRN) recorded by Civil Enforcement Officer so incorrect data requested and provided by DVLA Information breached includes; PCN number, VRN, date time and location
DB2023054	Y	Children, Families and Education	Human Error	Corrective Action	No	Two Public Protection Notices (Police notices) sent to the wrong college. Information breached includes; Details of a police incident
DB2023055	Y	Culture, Leisure and Regulatory Services	Inappropriate Action by Staff	Multiple	No	Out of office contained a signpost to the member of staff's private email for urgent issues Information breached includes; None

DB2023056	Y	Finance and Resources	System Error	Multiple	No	Absence Data for St Jude's School visible to Director of Business Operations in Mayfield School's portal Information breached includes; Names of students and absence data
DB2023057	N	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Subject access request sent to the wrong person information breached includes; name, dob, address, details of request
DB2023058	Y	Regeneration	Human Error	Multiple	No	Work notepad misplaced in car park and handed to ground floor security Information breached includes; names, phone number and email addresses relating to 2 enforcement case files.
DB2023059	Y	Housing Neighbourhood and Building Services	Inappropriate Action by Staff	Multiple	No	Laptop assigned to contractor missing and lost. Information breached includes; personal data that may have been stored on the laptop (although this was immediately remotely wiped by IT Service Desk)
DB2023060	Y	Housing Neighbourhood and Building Services	Human Error	Multiple	No	Bank statements sent to the wrong client Information breached includes; Bank details including a former address not current
DB2023061	N	Regeneration	Human Error	Multiple	No	Incorrect registration number input into system meaning we requested data from DVLA we were not entitled to and Penalty Charge Notice posted information breached includes; PCN Number, VRM, date, time and location of incident
DB2023062	Y	Children, Families and Education	System Error	Corrective Action	No	A Public Protection Notice (PPN) was received from Police that needed to be shared with school. PPN e-mailed to the school recorded on Mosaic. E-mail received from school stating the child no longer attends there. Information breached includes; Social Care involvement, home conditions, names, dates of birth, addresses, Police comments
DB2023063	Y	Public Health	System Error	Corrective Action	No	Security permissions incorrect for documents on Sharepoint. Information breached includes; Various files but mostly small numbers across various sensitive categories such as health, ethnicity etc.

DB2023064	Y	Children, Families and Education	Human Error	Corrective Action	No	Lost work mobile Information breached includes; contact data and messages
DB2023065	N	Finance and Resources	Human Error	Multiple	No	Pension Credit details scanned in and sent to incorrect customer Information breached includes; Name, address, National insurance number
DB2023066	N	Children, Families and Education	Human Error	Corrective Action	No	Letter and Child in Need plan and minutes sent to wrong address Information breached includes; name, DOB and details about the young person's needs and services provided to them.
DB2023067	Y	Finance and Resources	Human Error	Corrective Action	No	Email sent to incorrect email address Information breached includes; 2 Business Rate bills. Sent to incorrect Person with the same name
DB2023068	Y	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Email included details of another person in error Information breached includes; Surname of adult and full names of 2 children
DB2023069	Y	Children, Families and Education	Human Error	Corrective Action	No	School Attendance Penalty Charge Notice sent with incorrect child's name on Information breached includes; Name of a child
DB2023070	Y	Housing Neighbourhood and Building Services	Criminal Action	Police Notified	No	Tablet stolen from locker in the Civic Offices Information breached includes; none - Housing Options database installed on database but not accessed
DB2023071	Y	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Member of staff shared the name and email address of a resident reporting a required repair with the contractor in error Information breached includes; Name, email address
DB2023072	Y	Children, Families and Education	Human Error	Corrective Action	No	Member of staff receiving emails not intended for them - meant for another officer with the same name Information breached includes; Name of child, information about attendance and family circumstances

DB2023073	Y	Regeneration	Human Error	Revised Process	No	Schedule and passenger details for home to school journeys put in staff members home waste bin Information breached includes; Name, Address, Date of Birth, High Level information about physical or mental health, transport requirements
DB2023074	Y	Housing Neighbourhood and Building Services	Human Error	Multiple	No	Email sent to incorrect internal mailing list Information breached includes; Name & telephone numbers
DB2023075	Y	Housing Neighbourhood and Building Services	Human Error	Corrective Action	No	Lost mobile phone Information breached includes; Names & telephone numbers of PCC tenants although phone remotely wiped
DB2023076	N	Housing Neighbourhood and Building Services	Inappropriate Action by Staff	Training	No	Surveyor overshared details with a resident about their neighbour Information breached includes; Fact that the neighbour is pursuing a disrepair claim
DB2023077	Y	Children, Families and Education	Inappropriate Action by Staff	Disciplinary Action	No	Member of staff found to have a list of passwords written down Information breached includes; none but If lost could have allowed access to some internal systems

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.