

INFORMATION COMPLIANCE - DATA BREACH / ICO LIAISON DASHBOARD

March 2020

❖ Since 25th May 2018, there have been:

- 95 Serious Breach incidents reported at Gwent police
- 23 reported in 2018
- 50 reported in 2019
- 22 reported so far in 2020

❖ In line with the Serious Breach Impact Assessment, incidents were graded as follows:

- GREEN = 50 (Impact on data subject is minimal)
- AMBER = 32 (Subject suffers some damage or distress)
- RED = 6 (Impact on data subject is significant)
- No Breach = 7

❖ Of the 88 incidents where a breach had occurred:

- 80 (91%) involved personal data that had been compromised whilst conducting official duties
- 7 (8%) related to security breaches whereby items containing sensitive information had been misplaced
- 1 (1%) external factors

SUMMARY (January 2020 - Current)

Reference	Summary	Report to ICO	Department	Outcome
SBIA_001-20	Subject Access Disclosure containing third party data sent to incorrect data subject, via Egress.	No	Information Services	Closed. Disclosure removed from Egress, preventing further access. Recipient confirmed that no information copied/resent.
SBIA_002-20	Serious Organised Crime Management Plans containing operational information sent to SOC Stakeholder Group via email, in error.	No	Serious Organised Crime	Closed. Each recipient contacted and asked to delete email containing sensitive attachment. All recipients trusted partners.
SBIA_003-20	PNC vehicle prints sent to wrong recipient, internally.	No	Neighbourhood	Closed. Issue identified with address list whereby initials have been removed therefore individuals with similar/same name wrongly selected.
SBIA_004-20	Details of individuals attend the Ride A Long Scheme emailed to staff member in Custody in error.	No	Neighbourhood	Closed. Information duly deleted. Contained within secure environment.
SBIA_005-20	Letter containing third party details sent to incorrect Insurance Broker.	No	Information Services	Closed. Information duly deleted.
SBIA_006-20	Victim details linked to perpetrator and sent details on a Postal Charge Requisition. Resulted in him contacting victim and breaching Order.	No	Local Policing Area	Closed. Niche Record amended. PSD informed. Data Subject notified.
SBIA_007-20	Candidate email addresses shared in error.	No	HR Admin	Closed. Recipients requested to delete email.
SBIA_008-20	Payroll send incorrect contact details to Torfaen Pensions, meaning pension details sent to incorrect recipient.	No	Payroll	Closed. Error occurred as template used with old details on it. Data Subject informed.
SBIA_009-20	CPS reported that Police sent complainants details which were in turn sent to defendant.	No	Local Policing Area	Closed. CPS Breach. Safety plan activated for complainant.

SBIA_010-20	Documents left in pool car – found by Fleet Services.	No	Unknown	Closed.
SBIA_011-20	Victim support letter sent to wrong recipient (known to recipient)	No	Victim Support	Closed. Call-Handling recorded wrong details. Niche details amended.
SBIA_012-20	CICA letter sent to wrong recipient.	No	Information Services	Closed. Email duly deleted.
SBIA_013-20	PSD letter sent to wrong recipient via email. Email drop down list issue.	No	Professional Standards	Closed. Email duly deleted.
SBIA_014-20	Email contained attachment with incorrect staff member details.	No	HR Admin	Closed. Email duly deleted.
SBIA_015-20	Commercially Sensitive details sent to wrong supplier	No	Contracts & Procurement	Closed. Data Subject notified.
SBIA_016-20	Children in Custody Performance Pack sent to Welsh Government unredacted.	No	Custody	Closed. Email duly deleted.
SBIA_017-20	Tweet contained address details.	No	Corporate Comms	Closed. Tweet removed immediately following report from concerned subject.
SBIA_018-20	Blue Books x 2 misplaced following submission to Info Gov.	No	Information Governance	Closed.
SBIA_019-20	Document containing Officer details and reasonable adjustments sent to multiple internal recipients.	No	HR Recruitment	Closed. Email duly deleted.
SBIA_020-20	Empty property bags containing personal details left in general waste.	No	MIT	Closed. Appropriate advice given.
SBIA_021-20	Details regarding officer subject to misconduct disclosed via a multi participant Skype school in error (participant believed microphone was muted).	No	Professional Standards	Closed. Data Subject advised.

THE INFORMATION COMMISSIONER'S OFFICE (ICO)

The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

ICO Notifications:

Breaches reported to the ICO May 2018 – December 2018	6	All assessed by the ICO and closed with suitable advice
Breaches reported to the ICO January 2019 – December 2019	5	Awaiting outcome of Eurofins Information Notice All others assessed by the ICO and closed with suitable advice.
Breaches reported to the ICO January 2020 - Current	0	

ICO Complaints

Complaints received from ICO May 2018 – December 2018	3	All assessed and closed following suitable action
Complaints received from ICO January 2019 – December 2019	5	None upheld.
Complaints received from ICO January 2020 - Current	2	Neither upheld.

ICO Information Notices:

Eurofins Information Notice received from ICO July 2019	1	Response submitted 26/07/19.
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ICO Decision Notice (FOI):

Decision Notice received from ICO January 2020 - Current	1	FS50888902. Breach of s.10 (Timeliness) & 17 (Refusal Notice).
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ICO Self Referral:

Referral submitted to ICO May 2018 – December 2018	0	n/a
Referral submitted to ICO January 2019 – December 2019	1	ICO will action upon receipt of complaint from data subject
Referral Submitted to ICO January 2020 - Current	0	

Information Governance Actions:

1	Targeted data protection awareness sessions where multiple incidents occur	Active and ongoing
2	Continuous monitoring of NCalt Managing Information module	Reactivated by IAB
3	Initiate annual refresher training of NCalt Managing Information module	Active and ongoing
4	Continuous monitoring of Data Breaches to ensure effective and timely reporting to ICO	Active and ongoing

End of report.