Holme Low Parish Council
Data Breach Response Plan

1. Definition of a Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

- **Examples:** Lost/stolen laptops or unencrypted USB sticks; sending an email containing personal data to the wrong person; or a cyber-attack on the council's domain.

2. Immediate Response (Within 24 Hours)

As soon as a breach is suspected or discovered, the following steps must be taken:

- **Containment:** Take immediate action to stop the breach (e.g., change passwords, disconnect the affected device from the network, or ask the recipient of a misdirected email to delete it).
- **Notification:** Report the incident immediately to the Clerk (or the Chair if the Clerk is unavailable).
- **Record:** Use a "Data Breach Log" to record the date, time, and nature of the breach, even if it is later found not to be reportable.

3. Assessment and Reporting (The 72-Hour Rule)

The Clerk must assess whether the breach is likely to result in a risk to the rights and freedoms of individuals.

- **Report to the ICO:** If there is a risk to individuals, the council must notify the ICO within 72 hours of becoming aware of the breach.
- **Report to Individuals:** If the breach is likely to result in a *high risk* to individuals (e.g., identity theft or financial loss), the affected persons must be notified without undue delay.

4. Remediation and Review

Following a breach, the council will:

- **Investigate:** Identify the root cause (e.g., lack of training, technical failure, or human error).
- **Update Systems:** Implement changes to the IT Policy or hardware to prevent recurrence (e.g., enabling Multi-Factor Authentication or encryption).
- **Council Minutes:** Report the breach (anonymised) to the full council at the next meeting to ensure oversight and transparency.

5. Key Contacts

- **Council Lead:** Parish Clerk

- **ICO Reporting Line:** 0303 123 1113 / www.ico.org.uk.

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