

# BORDEN PARISH COUNCIL DATA BREACH POLICY

Adopted: 20/11/2025

## 1. Purpose

This policy outlines how Borden Parish Council will manage and report any actual or suspected personal data breaches in accordance with the **UK GDPR** and **Data Protection Act 2018**.

## 2. 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 transmitted, stored or otherwise processed (Article 4 (12)).

Examples include:

- Loss or stolen devices or papers
- Sending personal data to the wrong person
- Unauthorised access to systems or personal information
- Loss of access to data (e.g., through ransomware or IT failure).

## 3. Responsibilities and Actions

- All councillors, staff, and contractors must report suspected breaches immediately to the Clerk (data controller).
- The Clerk must record all incidents using the *Data Breach Reporting Form (see attached)* and assess the level of risk to individuals, and work to contain the breach, recover any lost data where possible, and prevent further incidents.
- If the breach is likely to result in a risk to individuals, **the Information Commissioner's Office (ICO)** must be notified **within 72 hours**.  
If there is a **high risk to individuals**, they must also be informed **without undue delay**.
- All breaches, whether or not reported to the ICO, must be recorded in the Council's Data Breach Register.
- Where appropriate, passwords will be changed, access rights reviewed, and systems updated.

## 6. Review and Learning

After every breach, the Clerk will review:

- the cause of the incident;
- the effectiveness of the response; and
- any actions required to prevent recurrence.

## 7. Review

This policy will be reviewed **annually** or sooner if required by law or operational change.<sup>1</sup>

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<sup>1</sup> This document has been compiled with references from:

- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- Information Commissioner's Office (ICO)
- SLCC AN176 -Information Management: Data Protection: Data Breach

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## Data Breach Reporting Form

**To be completed immediately upon discovery of a breach**

|                                                                                                                                                                                           |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Date and time of Notification of Breach                                                                                                                                                   |  |
| Notification of Breach to whom<br><br>Name:<br><br>Contact Details:                                                                                                                       |  |
| Details of Breach                                                                                                                                                                         |  |
| Nature and content of Data Involved                                                                                                                                                       |  |
| Number of individuals affected:                                                                                                                                                           |  |
| Name of person investigating breach<br>Name<br>Job Title<br>Contact details:<br>Email<br>Phone number<br>Address                                                                          |  |
| The Information Commissioner Office informed<br><br>Time and method of contact<br><br><a href="https://report.ico.org.uk/security-breach/">https://report.ico.org.uk/security-breach/</a> |  |
| Police Informed if relevant<br><br>Time and method of contact<br><br>Name of person contacted<br><br>Contact details                                                                      |  |
| Individuals contacted<br><br>How many individuals contacted?<br><br>Method of contact used to contact?                                                                                    |  |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>Does the breach affect individuals in other EU member states?</p> <p>What are the potential consequences and adverse effects on those individuals?</p> <p>Confirm that details of the nature of the risk to the individuals affected:</p> <p>any measures they can take to safeguard against it;</p> <p>and the likely cost to them of taking those measures is relayed to the individuals involved.</p> |  |
| Staff briefed                                                                                                                                                                                                                                                                                                                                                                                               |  |
| Assessment of ongoing risk                                                                                                                                                                                                                                                                                                                                                                                  |  |
| Containment Actions: technical and organisational security measures have you applied (or were to be applied) to the affected personal data                                                                                                                                                                                                                                                                  |  |
| Recovery Plan                                                                                                                                                                                                                                                                                                                                                                                               |  |
| Evaluation and response                                                                                                                                                                                                                                                                                                                                                                                     |  |