

Policy for Assessing & Reporting Data Breach



When it becomes clear there has or may have been a breach this should be reported to Managing Director who assume the lead role in managing the breach and then ensure the following steps are taken.

Containing the breach and recovering from the impact

Initial steps should be taken to contain the breach, for example changing passwords, shutting computers down or halting network traffic.

Consider who to notify including the ICO, the data subjects, industry regulators and the police.

Assessing the risk

A breach can impact business transactions and Acorn's staff's ability to work, it can also harm our reputation, but special consideration should be given to the data subjects and the risk to their personal data.

Consider how this breach could cause harm to those affected, including:

- How sensitive is the data?
- Could this breach lead to distress, financial or even physical harm?
- Are there any safeguards in place that could lower the risk? For example, is the data encrypted? Has it gone to a trusted body?
- Are there more safeguards you can put in place now?

Deciding who you need to inform

The GDPR brings in a requirement to report a personal data breach to the ICO unless Acorn can demonstrate it's unlikely to result in a risk to individual's rights and freedoms.

If there is a high risk to individuals' rights and freedoms the ICO will need to notify, the ICO who may also be able to offer advice to help stop the breach and how to stop it happening again.

The ICO can be contacted to report a breach on their helpline number 0303 123 1113. Information required will be as follows:

- What happened, when and how Acorn found out about the breach.
- Who may be affected by the breach?
- What Acorn is doing as a result of the breach?

Learning from the incident

Consideration also need to be made to:

- What have we learned from this breach?
- How can we do to improve our practices?
- What have we done or will do to stop a similar incident from happening again?

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