

Email

ICO Decision - IC-186074-...

Regarding

Worked By

Status Reason

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Activity Marker



Direction



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Email

From

 ICO Casework

To



Cc

Subject

ICO Decision - IC-186074-C0F6

Display Name

Date Received

20/08/2022 08:08

Email Address

20 August 2022

ICO Reference Number: IC-186074-C0F6

Dear 

I am writing further to your personal data breach report of 11 August 2022 regarding an excel document being given public access permission rather than private. This incident affects over 40, 000 data subjects.

Thank you for the information you have provided.

Data security requirements

You are required to have appropriate technical and organisational measures in place to ensure the security of personal data.

Our decision

We have considered the information you have provided and we have determined that no further action by the ICO is necessary on this occasion.

This decision is based on the information we have recorded about the breach.

The reasons for our decision are as follows:

- You have stated that you believe this incident to be attributable, in part, to human error. This suggests that this was an isolated incident and was therefore unlikely to have been indicative of a wider systematic data protection failure on behalf of your organisation;
- To date, you have no evidence that there has been any actual harm to data subjects;
- The member of staff involved in this incident has received data protection training within the last two years, and;
- You have overseen an appropriate incident response process in order to contain this breach, which has included reverting the document back to its private setting and running checks to ascertain the level of disclosure. You have also contacted all viewers to request that they delete any copies held.

Recommendations

However, we recommend that you review the causes of this incident to ensure that you understand how and why it occurred, and what steps you need to take to prevent it from happening again.

In particular, we recommend that you consider:

- Communicating amongst all staff the importance of data security and reiterating the significance of good data protection practice. This should be done frequently, for example by email, internal bulletin or team meetings;
- Evaluating your internal information retention periods to ensure that personal data is only held as long as you need it. You should periodically review this data, and erase or anonymise it when it is no longer legitimately necessary. This should reduce the amount of data which is available in the event that an unauthorised individual gains access to your internal systems;
- Continuing in your efforts to ensure the containment of this document by reminding the individuals who may have downloaded it that they should not further discuss, disclose, copy or misuse any of the personal data contained. If necessary, you may wish to remind them of the data protection legislation covering this matter, and;
- Determining whether it may be appropriate to undertake an audit of your existing policies and procedures to identify if there are any gaps in your data security measures which could be improved. This should reduce the likelihood of a recurrence of a breach of personal data.

Please note that as a result of a breach an organisation may experience a higher volume of information rights requests and complaints, particularly in relation to access and erasure. If you receive these complaints, you should have a contingency plan, such as extra resources, to deal with them. You should not refer these complaints to the ICO as a matter of course, and it is important that you continue to deal with complaints, alongside the other work that has been generated as a result of the breach.

Please note that we may make additional enquiries if we become aware of new information which affects the circumstances of this case.

Thank you for reporting the incident. Further information and guidance relating to data security is available on our website.

We now consider this matter to be closed.

Yours sincerely,

Information Commissioner's Office

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF


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