

Data Loss and Information Security Breach Reporting policy

1.0 Introduction

1.1 This policy forms part of The Wrekin Housing Group's ("the Group") Data Protection and Information Security policies.

1.2 The Group holds, processes and shares a large amount of personal data. Any loss of, or unauthorised access to, this personal data may result in harm to individuals, reputational damage, a damaging effect on service provision, legislative non-compliance and financial loss.

1.3 The Group will comply with the General Data Protection Regulations 2016 ("GDPR") and the Data Protection Act 2018 and will take appropriate measures against unauthorised or unlawful processing and against accidental loss, destruction of, or damage to, personal data. This policy is one of those measures.

2.0 Policy Statement

2.1 The purpose of this policy is to ensure that:

- A loss of data or a breach of data security is detected, reported, categorised and monitored consistently;
- Incidents are assessed and responded to appropriately;
- Action is taken to reduce the effect of the breach;
- Appropriate improvements are made to procedures and data security following a data breach, to help stop this occurring again;
- Breaches are reported to the Information Commissioner's Office ("ICO") and the individual affected as required;
- Lessons learned are communicated throughout the Group to help prevent future incidents.

3.0 Policy Scope

3.1 This policy applies to all Group employees, suppliers, contractors and those acting on behalf of the Group who process personal data, for which the Group is either the data controller or has an interest in the personal data.

4.0 Definitions

4.1 "Data Controller" - a person who determines the reasons for and the ways in which personal information is processed.

4.2 “ICO” - the Information Commissioner’s Office, the independent regulator in charge of upholding an individual’s information rights.

4.3 “Personal Data” - any information that can identify a living person.

5.0 Roles and Responsibilities

5.1 The Group’s Legal and ICT Teams are responsible for receiving, assessing, recording and reporting (when necessary) reports of personal data breaches.

5.2 The Group’s Legal and ICT Teams are responsible for ensuring any system changes or additional advice and training is put in place where necessary after receiving a report of a data breach.

5.3 All Group employees are responsible for keeping personal data secure.

5.4 All Group employees are also responsible for:

- Reading this policy and procedure;
- Understanding how to recognise a personal data breach and what to do when one is identified.

The Wrekin Housing Group	Policy Control Sheet Data Loss and Information Security Breach Reporting policy Number 2021/010
Policy Author	Caroline Guy Group Head of Legal
Direct Lead	Jan Lycett Executive Director of Business Solutions
Version	1. April 2021
Target audience	All Wrekin Housing Group & Choices Employees
Consultation	Tenants Panel Senior Managers
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy.
Date of Data Privacy Impact Assessment	No DPIA is required as complying reporting and dealing with a data breach involves the search and retrieval of information already held using existing databases.
Approving Body	Executive Management Group
Date of final approval	22 nd April 2021
Implementation date	30 th April 2021
Monitoring arrangements	All notified breaches are recorded by the Legal Team together with any subsequent action taken.
Reporting	EMG
Review date	October 2023
Expiry date	30 th April 2024
Review cycle	Three year review cycle
Policy category	GDPR & Data Protection
Associated policies and procedures	Data Loss and Information Security Breach Reporting procedure Confidentiality and Data Protection policy Confidentiality and Data Protection procedure CCTV policy CCTV procedure Cyber Security training
Policy location	Intranet The Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Caroline Guy	Policy review	1. April 2021	EMG – 22 nd April 2021