

Trinity Presbyterian Church

Bangor

Data Breach Policy

Trinity Presbyterian Church, Bangor, is committed to complying with data protection legislation and will take appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss or destruction of, or damage to personal data.

If, despite the technical and organisational measures that we have put in place to protect personal data, a data security breach occurs, it is important to manage and respond to it effectively. A data security breach covers more than the simple misappropriation of data and may occur through incidents, such as:

- Loss or theft of data or equipment;
- People gaining inappropriate access;
- Equipment failure;
- Human error;
- Catastrophic events (e.g. fire or flood);
- A deliberate attack on systems; or
- Malicious acts such as hacking, viruses or deception.

If such an incident occurs, it is imperative that we act immediately. The following steps will be taken:

1. The Data Protection Lead, Minister and Clerk of Session will be informed immediately;
2. An investigation will be undertaken to determine:
 - a. The nature and cause of the breach; and
 - b. The extent and nature of harm that has or could arise from the breach.

If there is no risk of harm, then no further action is required. For example, if papers are temporarily lost due to being incorrectly filed, but then are promptly found and no disclosure has occurred or harm is likely to occur, then no further action is required.

If there is considered to be a risk of harm, then the following steps must be taken:

1. The Information Commissioner's Office must be informed within 72 hours. If we do not have all of the information by then, a report should be made within the 72 hours on the basis of what is known while investigations continue.
2. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we must also inform those individuals without undue delay. Examples of this could include where there is a high risk of reputational damage, embarrassment or putting the individual's property at risk.

3. If necessary, a number of third parties will be informed which may include:
 - a. PCI
 - b. Trinity's insurers;
 - c. The PSNI;
 - d. Trinity's solicitors.
4. Following notification, we will continue to liaise and cooperate with the ICO.
5. All reasonable steps to mitigate any damage arising from the breach will be taken.

A record of all data protection breaches will be maintained regardless of whether or not notification is required. Detailed records of the investigation will also be maintained.

Following a breach, it must be considered whether any of the following are required:

1. Internal review of security procedures;
2. Disciplinary action;
3. Legal action.

A number of precedent documents have been prepared which may be of use. Where possible, legal advice should be sought in the case of a data breach prior to sending this correspondence.

Appendix A contains a precedent letter which can be sent to a data subject on discovery of a data breach which is likely to result in a high risk of harm to the data subject and/or Trinity. This could be significant reputational damage or embarrassment, or putting a person/s or property at risk.

Appendix B contains a precedent letter informing the ICO upon a data breach from which there is a risk of harm.

September 2018

Trinity Presbyterian Church

Address: Main Street, Bangor, Co Down BT20 5AF

Website: www.trinitybangor.org.uk

Telephone: (028) 9145 6619

Registered Charity in Northern Ireland (NIC: 105214)

Trinity Presbyterian Church

Main Street, Bangor, Co. Down BT20 5AF

Data Protection Lead: [Insert name] Email: gdprrlead@trinitybangor.org.uk

Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

A faith community of disciples who want to become more like Jesus and introduce others to him

To: [Insert name
and address of data subject]

Date: .

Dear

Personal Data Breach Notification

I regret to inform you of a breach of security that has resulted in the [loss/unauthorised disclosure/destruction/corruption] of your personal data.

The breach was discovered on [date] and is likely to have taken place on [date].

As a result of my investigation of the breach, I have concluded that:

1. The breach affects the following types of information:
 - a. [describe types of information affected e.g. financial or
 - b. sensitive personal data].
2. The information has been [accidentally/unlawfully destroyed/lost/alterred/disclosed without authorisation/accessed by [name or description of organisation]/an unauthorised person].
3. The breach occurred under the following circumstances and for the following reasons:
 - a. [Describe circumstances];
 - b. [Give reasons].

I have taken the following steps to mitigate any adverse effects of the breach:

1. [Describe measures taken].
- 2.

I recommend that you take the following measures to mitigate possible adverse effects of the breach:

1. [Describe recommended measures].
- 2.

I informed the Information Commissioner's Office of the breach on [date].

If you require any further information about the breach, please contact me.

I apologise for any inconvenience this breach may cause you.

Yours sincerely

[Insert name]

Data Protection Lead

Trinity Presbyterian Church, Bangor

Trinity Presbyterian Church

Main Street, Bangor, Co. Down BT20 5AF

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Church Office Tel: (028) 9145 6619 Website: www.trinitybangor.org.uk

Minister: Rev Stephen Orr

A faith community of disciples who want to become more like Jesus and introduce others to him

To: The Information Commissioner's Office

[Insert address]

Date: .

Dear

Personal Data Breach Notification

I am writing to inform you of a breach of security that has resulted in the [loss/unauthorised disclosure/destruction/corruption] of personal data.

I consider this to be a serious data security breach.

I have investigated the breach by [insert details of how the breach was investigated] and provide you with the following information [or] I am in the process of investigating the breach and anticipate completing my investigation by [date], when I will provide you with the further information required. I can provide you with the following details at this stage [provide all that is known]:

1. Trinity Presbyterian Church, Bangor, is the data controller.
2. The breach was discovered on [date] and is likely to have taken place on [date].
3. The information has been [accidentally/unlawfully destroyed/lost/alterd/disclosed without authorisation/accessed by [name or description of organisation]/an unauthorised person].
4. The breach occurred under the following circumstances and for the following reasons:
 - a. [Describe circumstances];
 - b. [Give reasons].

Measures in place

We had the following measures in place to prevent an incident of this nature occurring:

1. [Describe the measures];
- 2.

We enclose extracts of policies and procedures that we consider to be relevant to the breach:

1. [List extracts of policies and procedures and the date they were implemented].
- 2.

The following were in existence at the time of the breach:

1. [List of policies and procedures, and date implemented];
- 2.

Personal data placed at risk

The breach affects the following types of information:

1. [Describe types of information affected, e.g. financial or
2. sensitive personal data and give details of the extent].

It is likely that the breach affects around [number] data subjects.

I have/not informed the individuals affected by the breach because [reasons for decision]/The individuals are aware/unaware that the incident has occurred.

The breach may have the following consequences and adverse effects on the affected data subjects:

1. [Consequences];
2. [Adverse effects].

We have received [number]/ not received any complaints from the affected individuals.

Containment and recovery

We [have taken/propose to take] the following measures to address the breach and to minimise and mitigate its effects on the affected individuals:

1. [Measures];
- 2.

The information has/not been recovered [and the details are as follows:

1. [details of how and when it was recovered]

We have also taken the following steps to prevent future occurrences of the breach:

1. [Remedial action taken];
- 2.

[The facts surrounding the breach, the effects of that breach and the remedial action taken have been recorded in a data breach inventory maintained by Trinity Presbyterian Church, Bangor.]

Training and guidance

We provide staff/volunteers/leaders with training on the requirements of data protection legislation [and the details are as follows:

1. [details or extracts from training relevant to this data breach];
- 2.

We provide detailed guidance to staff/volunteers/leaders on the handling of personal data in relation to this incident [and the details are as follows:

1. [Details or extracts of any detailed guidance given to staff/volunteers/leaders on the handling of personal data in relation to the data breach]
- 2.

We confirm that training on the requirements under the data protection legislation is mandatory for all staff/volunteers/leaders [and that the staff/volunteers/leaders involved in this incident received training on [date]].

Previous contact with the Information Commissioner's Office

We have/not reported [any] previous incidents to you within the last two years [and the details and reference numbers are as follows:

1. [Details of incident(s)].
2. [Date(s) on which the incident(s) was [were] reported].
3. [The Information Commissioner's Reference number/s, if known].

Miscellaneous

We have/not notified any other (overseas) data protection authorities about this data breach [and the details are as follows:

1. [details of data protection authorities].
- 2.

We have/not informed the police about this data breach [and the details are as follows:

1. [Name
2. and details of police force].

We have/not informed any other regulatory bodies about this data breach [and the details are as follows:

1. [Name
2. and details of regulatory bodies].

There has/not been [any] media coverage [and the details are as follows:

1. [details of media coverage]
- 2.

In addition, we consider that the following information would be of interest to you:

1. [Details]
2. .

Contact details:

If you require any further information about the breach, please contact me.

Yours faithfully

[Insert name]

Data Protection Lead

Trinity Presbyterian Church, Bangor