



# Barrowby Parish Council

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## Data Breach Response Plan

### Document control

- **Owner:** Assistant Clerk
- **Responsible officer:** Clerk / Proper Officer
- **Adopted:** 11.05.2026 (Minute ref: 8e [26/008])
- **Version:** 2026.1
- **Review:** Annually or earlier if legislation/guidance changes
- **Next review due:** January-March 2027 at Full Council for formal adoption at Parish Council May 2027

### 1. Purpose

This plan sets out the action to be taken if Barrowby Parish Council becomes aware of a personal data breach.

Its purpose is to ensure the Council:

- acts promptly to contain and recover the situation;
- assesses the risk to individuals;
- meets any legal reporting obligations; and
- keeps an appropriate record of all breaches and near misses.

### 2. What is a personal data breach?

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Examples include:

- sending personal data to the wrong recipient;
- losing paper files or devices;
- unauthorised access to council email or cloud storage;
- accidental publication of personal data;
- malware, ransomware or phishing incidents affecting council information;
- disposal of records without proper destruction.

### 3. Roles and Responsibilities

#### Assistant Clerk

The Assistant Clerk is the Council's lead officer for data protection and will normally coordinate the initial breach assessment, breach record, containment steps, risk assessment and any required notifications.

### **Clerk / Proper Officer**

The Clerk / Proper Officer will provide managerial oversight, support escalation where required, and assist with implementation of any urgent corrective action.

### **Council Chair**

The Chair will be informed of serious breaches and will support escalation where the breach is significant, sensitive, or involves the Clerk or Assistant Clerk.

### **Councillors, staff, volunteers and contractors**

All councillors, staff, volunteers and contractors must report any actual or suspected personal data breach immediately to the Assistant Clerk. If the breach involves the Assistant Clerk, or if they are unavailable, it must be reported to the Clerk or, if necessary, the Chair.

## **4. Immediate reporting requirement**

Any councillor, employee, volunteer, contractor or agent who becomes aware of an actual or suspected personal data breach must report it **immediately** to the Assistant Clerk.

If the breach involves the Assistant Clerk, it must be reported to the Clerk or Chair without delay.

## **5. Initial action**

On becoming aware of a suspected breach, the Council will:

1. **Contain** the breach where possible  
For example: recall an email, disable access, change passwords, isolate equipment, recover paperwork, or ask the unintended recipient to delete information.
2. **Assess** what has happened  
Including:
  - what data is involved;
  - how many individuals are affected;
  - whether special category or confidential data is involved;
  - whether the data is protected;
  - who has received or accessed it; and
  - the likely consequences for individuals.
3. **Record** the incident immediately in the breach log.
4. **Mitigate** risks and take recovery steps.

## **6. Risk assessment and notification threshold**

The Council must assess whether the breach is **likely to result in a risk** to the rights and freedoms of individuals.

- If **unlikely to result in a risk**, the breach does **not** need to be reported to the ICO, but it must still be recorded.
- If **likely to result in a risk**, the Council must notify the ICO **without undue delay and, where feasible, within 72 hours of becoming aware of it**.
- If the breach is likely to result in a **high risk**, affected individuals must also be informed **without undue delay**.

The 72-hour period runs from the point the Council becomes aware of a notifiable breach, not necessarily from when the incident first occurred.

## 7. Notification to the ICO

Where notification to the ICO or to affected individuals is required, this will normally be coordinated by the **Assistant Clerk** as the Council's lead officer for data protection, with support from the Clerk / Proper Officer and escalation to the Chair where appropriate.

The report should include, so far as available:

- the nature of the breach;
- categories and approximate number of individuals affected;
- categories and approximate number of records affected;
- likely consequences of the breach; and
- measures taken or proposed to address it.

If full information is not yet available, the Council will provide what it can within the deadline and follow up as necessary.

## 8. Notification to affected individuals

Where required, the Council will notify affected individuals clearly and promptly. The notification should explain:

- what happened;
- what information was involved;
- likely consequences;
- what steps the Council has taken;
- what steps the individual may wish to take; and
- who to contact for more information.

## 9. Breach log

The Council will keep a breach log recording all personal data breaches, whether or not they are reportable to the ICO.

The log should include:

- date and time discovered;
- who reported it;
- description of the incident;
- data involved;

- affected individuals;
- risk assessment;
- containment and mitigation steps;
- whether ICO notification was required;
- whether individuals were notified; and
- lessons learned / follow-up action.

## 10. Post-incident review

After any significant breach, the Council will review:

- the root cause;
- whether policies or controls need to change;
- whether staff/councillor training is needed;
- whether technical measures need improving; and
- whether any contracts or access permissions need updating.

## 11. Responsibilities

- **All councillors, staff, volunteers and contractors:** report incidents immediately.
- **Clerk / Proper Officer:** coordinates response, assessment, logging and notifications.
- **Chair:** supports escalation and acts where the breach concerns the Clerk or is especially serious.
- **Full Council:** receives lessons learned / governance updates where appropriate, without unnecessary disclosure of personal data.

## 12. Contact

**Lead officer for data protection: Assistant Clerk**

Email: [assistantclerk@barrowbyparishcouncil.gov.uk](mailto:assistantclerk@barrowbyparishcouncil.gov.uk)

If the matter involves the Assistant Clerk or they are unavailable, contact:

**Clerk / Proper Officer**

Email: [clerk@barrowbyparishcouncil.gov.uk](mailto:clerk@barrowbyparishcouncil.gov.uk)

If urgent and neither officer is available, contact the **Chair**.

## 13. Review

This plan will be reviewed annually and after any serious breach or material change in law or guidance