



GRAFHAM PARISH COUNCIL

Parish Clerk: Lisa Hazel

Chair: Mr I Gardener, 5 Haycraft Close, Grafham

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Data Breach Response Procedure

1. Purpose

This procedure explains how Grafham Parish Council will respond to any suspected or confirmed personal data breach, in accordance with the UK GDPR and Data Protection Act 2018.

2. What Is a Data Breach

A personal data breach includes:

- Loss or theft of council devices or papers
- Sending personal data to the wrong person
- Unauthorised access to council email or cloud storage
- Cyber-attack, malware, or hacking incident

3. Immediate Actions

Any councillor or officer who becomes aware of a possible breach must:

- Report it immediately to the Clerk (by phone where urgent).
- Provide all known details, including what data is involved and when the incident occurred.
- Take reasonable steps to contain the breach if safe to do so (for example recalling an email or securing a device).

4. Clerk Responsibilities

The Clerk will:

- Record the incident in a **data breach log**.
- Assess the risk to individuals' rights and freedoms.
- Take steps to contain and recover data where possible.
- Determine whether the breach must be reported to the **Information Commissioner's Office (ICO)** within **72 hours**.
- Notify affected individuals where legally required.
- Report significant incidents to the Council.

5. Learning and Prevention

Following any breach, the Council will:

- Review the cause of the incident.
- Update procedures or security controls if needed.
- Provide guidance to councillors or officers where appropriate.

6. Adoption

This policy was approved at the Parish Council meeting of 3rd March 2026 and adopted with immediate effect.

This policy will be reviewed every 3 years or when there are major changes to legislation or best practice.

Next review: March 2029