

A meeting of the **Communications Committee** will be held on  
**Friday, 6 July 2018**  
**in Shavington Village Hall, Shavington at 7.15 pm**

To: Members of the Committee  
Parish Council Members: Councillors M Andrews, B Gibbs (Chairman)  
W Cooper, M Ferguson and K Gibbs  
Non-Parish Council Members: Yet to be appointed

Date of issue: 2 July 2018

# AGENDA

## 1 APOLOGIES

## 2 DECLARATION OF INTERESTS

Members to declare any disclosable pecuniary interest or non-pecuniary interest which they have in any item of business on the agenda, the nature of that interest, and in respect of disclosable interests, to leave the meeting prior to the discussion of that item.

## 3 BREACH OF DATA PROTECTION REGULATIONS

### 3.1 Breach Notification

As Members will be aware, Typeform notified the Parish Council on 29 June 2018 that it had discovered (on 27 June 2018) that an unknown third party had gained access to its server and downloaded certain information, including some of the data supplied by the Parish Council's respondents to surveys undertaken between 2016 and 3 May 2018.

The company took immediate action and closed the source of entry and then carried out a forensic review of all its systems and is now satisfied that all data is safe.

It is estimated that about 304 of the Parish Council's data subjects might have been affected by the breach.

Although this took place prior to GDPR, the new Data Protection Act 2018 repeals the previous Data Protection Act 1998.

### 3.2 Action Taken by the Parish Council

The Information Commissioner's Office (ICO) was notified of the breach on 30 June 2018, using an official notification form from its website.

The form asked for details of proposed action to be taken in the case of a breach. The ICO has been informed that the Parish Council has called an emergency meeting of the Communications Committee to consider future arrangements to mitigate this type of breach by service-providers; a post is to be added to the website; and all affected data subjects are to be notified of the possibility that their data might have been compromised.

### 3.3 Mitigation Measures

The Committee is asked to consider –

- (a) The Committee is asked to consider mitigation measures to avoid future breaches by service-providers.
- What can the Council do to reduce the risk of future breaches in data security?
  - Should the Council terminate its relationship with Typeform?  
This will not be able to commence until September when the next edition of the newsletter is issued; the current newsletter makes reference to 'Typeform'.
  - Review data security taking into account use of online services.
- (b) A method of informing data subjects where there are no contact details.

In future, all surveys where data is collected should also include the need for contact details in the event of a breach.

- (c) Introduction of a Data Breach Policy

This would include the following basics:

- i. Identifying the nature of the breach and whether there is any potential harm to the individual affected.
- ii. Deciding if it is a significant breach. The ICO does not wish to be notified of insignificant breaches. This would, therefore, be a matter of judgement.
- iii. Notifying the ICO of the breach within 72 hours of becoming aware of the breach and this must include the number of individuals affected, the categories and approximate number of data records exposed, a description of the likely consequences and measures proposed or taken to mitigate the breach and its possible adverse effects.
- iv. Contact data subjects to inform them of the breach.
- v. Maintain a log of all breaches.

A copy of the Data Protection Policy is enclosed for information.