



Mossley Cricket Club, Moss Road, Congleton, CW12 3BN
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Breach Management Plan

Background Data security breaches are increasingly common occurrences whether these are caused through human error or via malicious intent. As technology trends change and the creation of data and information grows, there are more emerging ways by which data can be breached. Mossley Cricket Club needs to have in place a robust and systematic process for responding to any reported data security breach, to ensure it can act responsibly and protect its information assets as far as possible.

Aim The aim of this policy is to standardise a Mossley Cricket Club-wide response to any reported data breach incident, and ensure that they are appropriately logged and managed in accordance with best practice guidelines. By adopting a standardised consistent approach to all reported incidents it aims to ensure that:

- incidents are reported in a timely manner and can be properly investigated
- incidents are handled by appropriately authorised and skilled personnel
- appropriate levels the clubs committee are involved in response management
- incidents are recorded and documented
- the impact of the incidents are understood and action is taken to prevent further damage
- evidence is gathered, recorded and maintained in a form that will withstand internal and external scrutiny
- external bodies or data subjects are informed as required
- the incidents are dealt with in a timely manner and normal operations restored
- the incidents are reviewed to identify improvements in policies and procedures.

Definition

A data security breach is considered to be “any loss of, or unauthorised access to data held by Mossley Cricket Club”. Examples of data security breaches may include:

- Loss or theft of data or equipment on which data is stored
- Unauthorised access to confidential or highly confidential Club Data
- Equipment failure
- Human error
- Unforeseen circumstances such as a fire or flood
- Hacking attack
- ‘Blagging’ offences where information is obtained by deceit

For the purposes of this policy data security breaches include both confirmed and suspected incidents.

Scope

This club-wide policy applies to all information held by Mossley Cricket Club, regardless of format, and is applicable to all trustees, committee members, club members, volunteers and third parties acting on behalf of Mossley Cricket Club. It is to be read in conjunction with our Members Privacy Policy and Juniors Privacy Notice which can be found on our website.

Responsibilities

Information users

All information users are responsible for reporting actual, suspected, threatened or potential information security incidents and for assisting with investigations as required, particularly if urgent action must be taken to prevent further damage.

Trustees and Committee Members

Trustees and Committee Members are responsible for ensuring that all members in their area act in compliance with this policy and assist with investigations as required.

Contact Details

In the event that the DPO needs to be contacted please email carl@mossleycricketclub.co.uk.

Data Classification

Data security breaches will vary in impact and risk depending on the content and the quantity of the data involved, therefore it is important that Mossley Cricket Club is able to quickly identify the classification of the data and respond to all reported incidents in a timely and thorough manner. All reported incidents will need to include the appropriate data classification in order for assessment of risk to be conducted. Data classification referred to in this policy means the following approved Mossley Cricket Club Data Categories:

Public Data: Information intended for public use, or information which can be made public without any negative impact for Mossley Cricket Club.

Internal Data: Information regarding the day-to-day business and general operations of Mossley Cricket Club. Primarily for committee and member use, though some information may be useful to third parties who work with Mossley Cricket Club.

Confidential Data: Information of a more sensitive nature for the business and general operations of Mossley Cricket Club, representing the basic intellectual capital and knowledge. Access should be limited to only those people that need to know as part of their role within Mossley Cricket Club.

Highly Confidential Data: Information that, if released, will cause significant damage to Mossley Cricket Club's business activities or reputation, or would lead to breach of the Data Protection Act. Access to this information should be highly restricted.

Data Security Breach Reporting

Confirmed or suspected data security breaches should be reported promptly to the DPO of Mossley Cricket Club via email carl@mossleycricketclub.co.uk. The report should include full and accurate details of the incident including who is reporting the incident and what classification of data is involved. Where possible the incident report form should be completed as part of the reporting process. **See Appendix 1.**

All data security breaches will be logged by the DPO and reported to the club Chairman and Club Secretary.

Data Breach Management Plan

The DPO response to any reported data security breach will involve the following four elements. **See Appendix 2** for suggested checklist.

1. Containment and Recovery
2. Assessment of Risks
3. Consideration of Further Notification
4. Evaluation and Response

Each of these four elements will need to be conducted in accordance with the checklist for Data Security Breaches.

An activity log recording the timeline of the incident management should also be completed by the DPO. **See Appendix 3.**

Trustees, committee members, club members, volunteers, visitors and guests who act in breach of this policy, or who do not act to implement it, may be subject to disciplinary procedures or other appropriate sanctions.

Review

The committee of Mossley Cricket Club will monitor the effectiveness of this policy and carry out regular reviews of all reported breaches.

References: Information Commissioner:
<https://ico.org.uk/>

Appendix 1: Mossley Cricket Club Incident Report Form

Description of the Data Breach:	
Time and Date breach was identified and by whom.	
Who is reporting the breach: Name	
Contact details: Telephone/Email	
Classification of data breached i. Public Data ii. Internal Data iii. Confidential Data iv. Highly confidential	
Data Volume of data involved	
Confirmed or suspected breach?	
Is the breach contained or ongoing?	
Who has been informed of the breach	
Any other relevant information	

Email form to the DPO: carl@mossleycricketclub.co.uk or call 07740 673857 and advise that a Data Security Breach report form is being sent.

<i>Received by:</i>	
<i>Date/Time:</i>	

Appendix 2: Data Breach Checklists

- A. Containment and Recovery
- B. Assessment of Risks
- C. Consideration of Further Notification
- D. Evaluation and Response

A	Containment and Recovery	To contain any breach, to limit further damage as far as possible and to seek to recover any lost data.
1	Inform our DPO about the Breach by completing Appendix 1 above	DPO will fully investigate and produce a detailed report which will be submitted to the committee of Mossley Cricket Club
2	Identify the cause of the breach and whether the breach has been contained? Ensure that any possibility of further data loss is removed or mitigated as far as possible	Establish what steps can or need to be taken to contain the breach from further data loss. Contact all relevant committee members who may be able to assist in this process. This may involve actions such as taking systems offline or restricting access to systems to a very small number of members until more is known about the incident.
3	Determine whether anything can be done to recover any losses and limit any damage that may be caused	E.g. physical recovery of data/equipment, or where data corrupted, through use of back-ups.
4	Where appropriate, the DPO to inform the police.	E.g. stolen property, fraudulent activity, offence under Computer Misuse Act.
5	Ensure all key actions and decisions are logged and recorded on the timeline.	

B	Assessment of Risks	To identify and assess the ongoing risks that may be associated with the breach.
6	What type and volume of data is involved?	Data Classification/volume of individual data etc
7	How sensitive is the data?	Sensitive personal data? By virtue of definition within Data Protection Act (e.g. health record) or sensitive because of what might happen if misused (banking details).
8	What has happened to the data?	E.g. if data has been stolen, it could be used for purposes which are harmful to the individuals to whom the data relate; if it has been damaged, this poses a different type and level of risk.
9	If the data was lost/stolen, were there any protections in place to prevent access/misuse?	E.g. encryption of data/device.
10	If the data was damaged/corrupted /lost, were there protections in place to mitigate the impact of the loss?	E.g. back-up tapes/copies.
11	How many individuals' personal data are affected by breach?	
12	Who are the individuals whose data has been compromised?	
13	What could the data tell a third party about the individual? Could it be misused?	Consider this regardless of what has happened to the data. Sensitive data could mean very little to an opportunistic laptop thief while the loss of apparently trivial snippets of information could

		help a determined fraudster build up a detailed picture of other people.
14	Is there actual/potential harm that could come to any individuals?	E.g. are there risks to: <ul style="list-style-type: none"> • physical safety; • emotional wellbeing; • reputation; • finances; • identify (theft/fraud from release of non-public identifiers); • or a combination of these and other private aspects of their life?
15	Are there wider consequences to consider?	E.g. a risk to public health or loss of public confidence in an important service we provide?
16	Are there others who might advise on risks/courses of action?	E.g. If individuals' bank details have been lost, consider contacting the banks themselves for advice on anything they can do to help you prevent fraudulent use.

C	Consideration of Further Notification	Notification is to enable individuals who may have been affected to take steps to protect themselves or allow the regulatory bodies to perform their functions.
17	Are there any legal, contractual or regulatory requirements to notify?	E.g. terms of funding; contractual obligations
18	Can notification help Mossley Cricket Club meet its security obligations?	E.g. prevent any unauthorised access, use or damage to the information or loss of it.
19	Can notification help the individual?	Could individuals act on the information provided to mitigate risks (e.g. by changing a password or monitoring their account)?
20	If a large number of people are affected, or there are very serious consequences, inform the Information Commissioner's Office (through the Director of Information).	Contact and liaise with the DPO of Mossley Cricket Club.
21	Consider the dangers of 'over notifying'.	Not every incident will warrant notification, use common sense and discuss with the DPO
22	Consider whom to notify, what you will tell them and how you will communicate the message.	<ul style="list-style-type: none"> • There are a number of different ways to notify those affected so consider using the most appropriate one. Always bear in mind the security of the medium as well as the urgency of the situation. • Include a description of how and when the breach occurred and what data was involved. Include details of what has already been done to respond to the risks posed by the breach. • When notifying individuals give specific and clear advice on the steps they can take to protect themselves and also what the institution is willing to do to help them. • Provide a way in which they can contact us for further information or to ask questions about what has occurred (e.g. a contact name, helpline number or a web page).

23	Consult the ICO guidance on when and how to notify it about breaches.	<p>Where there is little risk that individuals would suffer significant detriment, there is no need to report.</p> <p>There should be a presumption to report to the ICO where a large volume of personal data is concerned and there is a real risk of individuals suffering some harm.</p> <p>Cases must be considered on their own merits and there is no precise rule as to what constitutes a large volume of personal data.</p> <p>Guidance available from http://www.ico.gov.uk/</p>
24	Consider, as necessary, the need to notify any third parties who can assist in helping or mitigating the impact on individuals.	E.g. police, insurers, professional bodies, funders, website/system owners, bank/credit card companies.

D	Evaluation and Response	To evaluate the effectiveness of Mossley Cricket Clubs response to the breach.
25	Establish where any present or future risks lie.	
26	Consider the data and contexts involved.	E.g. what data is held, its extent, sensitivity, where and how it is stored, how long it is kept.
27	Consider and identify any weak points in existing security measures and procedures.	E.g. in relation to methods of storage and/or transmission, use of storage devices, levels of access, systems/network protections.
28	Consider and identify any weak points in levels of security awareness/training.	Fill any gaps through training or tailored advice.
29	Report on findings and implement recommendations.	Report to the DPO who will pass to the club Chairman and Secretary.

