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Iechyd Cyhoeddus  
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Public Health  
Wales

**Name of Meeting**  
Audit and Corporate  
Governance Committee  
**Date of Meeting**  
15 September 2021  
**Agenda item:**  
3.10

## Data Breach Action Plan

<b>Executive lead:</b>	Rhiannon Beaumont-Wood, Executive Director, Quality, Nursing and Allied Health Professionals
<b>Author:</b>	Stuart Silcox, Assistant Director, Integrated Governance, Quality, Nursing and Allied Health Professionals

<b>Approval/Scrutiny route:</b>	Rhiannon Beaumont-Wood, Executive Director, Quality, Nursing and Allied Health Professionals.  Business Executive Team (6 September 2021)
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### Purpose

This paper presents the progress made against the action plan which was developed in response to the data breach in the Communicable Disease Surveillance Centre in August 2020.

### Recommendation:

APPROVE <input type="checkbox"/>	CONSIDER <input checked="" type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>
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The Audit and Corporate Governance Committee is asked to:

- **Consider** and take **assurance** on progress of the action plan

**Link to Public Health Wales [Strategic Plan](#)**

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

<b>Strategic Priority/Well-being Objective</b>	All Strategic Priorities/Well-being Objectives
<b>Strategic Priority/Well-being Objective</b>	Choose an item.
<b>Strategic Priority/Well-being Objective</b>	Choose an item.

**Summary impact analysis**

<b>Equality and Health Impact Assessment</b>	Not required
<b>Risk and Assurance</b>	A number of risks exist on the Information Governance Risk Register which relate to data protection and confidentiality, and this report relates to these.
<b>Health and Care Standards</b>	This report supports and/or takes into account the <a href="#">Health and Care Standards for NHS Wales</a> Quality Themes  Governance, Leadership and Accountability Choose an item. Choose an item.
<b>Financial implications</b>	Public Health Wales is at risk of serious financial sanctions in the event of a data breach. The actions are intended to reduce the risk of recurrence of a similar data breach to that which occurred in August 2021.
<b>People implications</b>	None identified.

## **1. Purpose / situation**

This paper presents the progress made against the action plan which was developed in response to the data breach in the Communicable Disease Surveillance Centre (CDSC) in August 2020. This follows the last update provided on 4 June 2021.

## **2. Background**

At approximately 1400hrs on Sunday 30th August 2020, PHW's CDSC inadvertently published, to a public facing website, information usually reserved for internal consumption. The information released contained personal data relating to 18,105 people who had tested positive for Covid19 since February 2020.

The information was contained in a dashboard which was published using the Tableau software platform. Where this dashboard would normally have been published to a secure Tableau server accessible only to Public Health Wales staff, on this occasion it was mistakenly published to a public facing Tableau server.

This action plan responds to recommendations arising from the externally commissioned investigation. The action plan has been previously received and approved by BET, the actions continue to be implemented and monitored by the Incident Management Team established at the outset of this incident.

### **Description/Assessment**

The action plan detailed a total of 19 actions. It should be noted that the number of actions do not match the number of red/amber/green statuses as some actions have more than one section. The full table with updates against each action is attached at appendix 1, for full details of the status of actions the action plan should be consulted.

The immediate remedial actions have been completed as have some short-term actions. Some actions required longer timelines to implement. Progress on all actions is outlined in the attached action plan but key points since the last update in June include:

- Action 1.3 is now complete with a CDSC process for the approval of new/revised data requests and information release methods and practices.
- Action 1.4 is now complete with revised and reissued Small Numbers guidance.

- Action 8.1 is now complete with a training needs analysis undertaken for CDSC staff responsible for processing and disseminating data
- Action 8.2 is now complete with mandatory Information Governance training complete and up to date for CDSC line managers and staff with responsibility for processing and disseminating data
- The Integrated Governance pilot project is taking forward a number of the actions on information governance, specifically in relation to disseminating organisational learning across Public Health Wales (1.3, 3.2, 4.1, 5.1). However, initial steps have already been taken to share organisational learning through, for example, discussion with the Business Leads Group. The further work relates to continuing to ensure that the learning is embedded. This will be completed by 31 October 2021.

The data breach Incident Management Team is continuing to meet and review outstanding actions. Since the last update report the previous Interim Executive Director for Public Health Services agreed where appropriate some revised timelines for completion dates, CDSC actions and also the Executive Director for Quality and Nursing agreed some date changes for Integrated Governance related actions.

Revised dates since the last BET update are:

- 1.2 – revised from 30 June to September 2021
- 3.2 – revised from July to December 2021
- 4.1 – revised from June to July 2021
- 5.1 – one element from July to September 2021

The following is a summary of the status of actions.

Actions completed	11
Actions in progress and not yet due	8
Actions in progress and overdue	1
Actions overdue and delayed due to external dependencies	2

Some of the actions where implementation dates have been revised are nearing completion including those where the Integrated Governance pilot has become the vehicle to promote cross organisational learning. Others, such as the peer review of CDSC procedures and the resultant sharing of learning are delayed because of workload and capacity issues for potential peer review bodies. We are actively seeking alternative options with the aim of completion by 31<sup>st</sup> December 2021.

Monitoring of the Action Plan continues to be overseen by the Business Executive Team

### **3. Recommendation**

The Audit and Corporate Governance Committee is asked to:

- **Consider** and take **assurance** on progress of the action plan.