

Ver3 Ref	Date reported	Scheme	Employer / Third Party	Type of Breach	Details of breach	Date of breach & ref no. if occurred before	Cause	Effect	Reaction Include actions planned/ taken to correct	Wider implications	Overall category & reporting recommendation	Final category & reporting decision	Reported by /date	tPR acknowledgement received	Date breach corrected
	3 September 2018	LGPS	COL	Annual Benefit Statements (ABS) sent to wrong scheme member	<p>29 ABS less than expected were distributed by COL following a print and envelope job by KNP printers.</p> <p>6 scheme member have confirmed they have received their ABS along with that of another scheme member.</p> <p>The ABS contained current and projected pension values along with personal data such as name, NI number, address and in some cases nominated beneficiaries.</p> <p>The ICO were notified within 72 of the breach becoming known</p>	31 August 2018	<p>Written confirmation from KNP printers that the ABS address did not fit in the envelope window.</p> <p>They accept responsibility for this. They also confirmed they did not inform the pension office and filled envelopes by hand.</p> <p>Furthermore, they confirmed the ABS were not returned in any order, job ref or alpha, and they had not correctly read emails asking for confirmation of numbers.</p> <p>They admitted they did not know if any were missing and did not know the final numbers returned to COL.</p> <p>The envelopes were counted by the franking machine in the post room at COL. Upon distribution it was confirmed the number was 29 less than expected.</p> <p>It was explained the counter sometimes skips a count on large print runs.</p> <p>The extent of the issue was not recognised until complaints on 3 September.</p>	<p>6 Scheme members to date have received someone else's ABS along with their own.</p> <p>Member data breached</p>	<p>Pension Manager met with printers KNP on 4 September 18 to ascertain exact details. (please see cause)</p> <p>ABS resent to members when informed of error along with a letter of apology.</p> <p>Printing for 2019 should be considered a full automated/digital production process.</p>	<p>A data breach under DPA 18 and GDPR .</p> <p>This has been reported to the ICO on 3 September.</p> <p>Within the 72 hour statutory deadline of reporting breaches.</p>	<p>Amber.</p> <p>This is a data breach but with numbers limited to potentially a maximum of 29 scheme members</p> <p>Breaches policy has been followed and senior COL officers and Board Members notified.</p> <p>ABS has been distributed and letters of apology have been sent to known members affected.</p> <p>There is no affect to the Fund or to other scheme members. Benefit values have not been incorrectly calculated or incorrectly paid.</p> <p>Investigation has determined issues were unforeseen and not in the control of COL and measure will/are to be taken to ensure cannot happen again.</p> <p>One off event.</p> <p>Therefore, not material, and not necessary to report to TPR.</p>	Amber.	N/A	N/A	<p>21 September 2018.</p> <p>Date of decision and conclusion</p>