

REPORTING A BREACH OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS

1. Core Information

Title and link to statistical output	Social housing lettings in England, 2016/17
Name of statistical producer	Department for Communities and Local Government (DCLG)
Name and contact details of person dealing with report	Sandra Tudor, sandra.tudor@communities.gsi.gov.uk, 030344442295
Link to published statement about the breach (if relevant)	N/A
Date of report	21/7/2017

2. Circumstances of breach

Relevant principle/protocol and practice	Protocol 2, Practice 8
Date of occurrence of breach	19/7/2017
<p>What was released:</p> <ul style="list-style-type: none"> The file released by mistake contains around 85k records collected via our CORE (Continuous Recording of Social Housing Lettings and Sales) online system. These are all the records for the financial year 2016/17 corresponding to General Needs lettings let at Affordable Rent, which is a type of letting that we publish in our National Statistics release. This release is due for publication in autumn this year. The record level information includes full postcode information (incode and outcode) as well as some sensitive data regarding the tenants (for example, whether they were referred by prison or mental health services), but no data that would allow direct identification of an individual or household. <p>How did it happen:</p> <ul style="list-style-type: none"> As part of the process of quality assurance of the 2016/17 data, a member of my team contacted our key contacts amongst our data providers (in local authorities and housing associations) with a log of errors found in the data for them to address. Given the size of our mailing list of over 200 contacts, we had to split it into several email batches. Within the hour, we realised that in one of these emails – sent to 35 people within 17 organisations - we had sent a copy of a different file with all the record level information. This sensitive file had been clicked on by mistake when selecting the email attachment. <p>What we did:</p> <ul style="list-style-type: none"> As a precaution, we recalled all the messages sent that morning straight away. We informed of the breach to our Statistics Head of Profession Sandra Tudor. Although the recall was mostly successful, it failed in a handful of cases. As a precaution we contacted the 35 people that had received the wrong file and asked them to delete and not to disseminate or use it in any way, and to provide us with confirmation that they had done it. We have now received confirmations of the file being deleted so we believe 	

that the released data is no longer outside our own systems but we cannot be certain.

- Given the sensitive information of some of the data, we considered whether we needed to inform the Information Commissioner in regards to breaching the Data Protection Act, but we concluded that it wasn't necessary as the risk of disclosure and misuse of the data was extremely low. Our assessment was based on two key points:
 - On one hand, the low number of recipients and their nature. Following our prompt action, we estimate that only a handful of people received the data and were asked to delete it and confirm deletion. All the recipients of the data were amongst our data providers, who have a keen interest to protect the data entrusted to them by their tenants in order to maintain their own reputation.
 - On the other hand, the nature of the information released. Though sensitive, it didn't contain personal identifiers and would require previous knowledge of a particular household in order to be able to subtract sensitive information on the household.

3. Impact of the breach

We believe that the impact of this breach is small, for a number of reasons:

- The 17 organisations that received the file are our own data providers
- It is in their own interest to protect their data or the tenants would not give them their consent for the data to be released to us so we do not believe that they would have any interest in releasing the data in advance.
- It is possible that the data relating to other housing providers may be misused by these data providers in some way, for example to gather information about the rents that other providers set in certain areas, but most of the information relating to lettings would be public anyway although not so easy to access.
- It is also possible, that they may be able to identify from the dataset a particular household that they know in a particular postcode, and find out some sensitive information about them, but the likelihood of this would be very small.
- Given our prompt action on this, we believe the likelihood of any misuse of data in the small number of cases where the data has not been successfully recalled is even smaller.

4. Corrective actions (taken or planned) to prevent re-occurrence

- We have reminded staff of DCLG policy of storing sensitive data files separately in a shared drive, away from other files and have reiterated the need to keep sensitive files, including working copies used for analysis, in designated folders for 'sensitive data'.
- We have also uploaded the files to be used in analysis into our online system with a clear indication to protect the data, and have restricted access solely to those people who need to access the files.
- We have password protected all the EXCEL files that are used during the quality assurance process of data, so that if this mistake ever happened again, we could be further reassured that the mistaken recipients could not open the file.