

REPORTING A BREACH OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS

1. Core Information

Title and link to statistical output	Monitor of Engagement with the Natural Environment (MENE) survey https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results
Name of statistical producer	Natural England
Name and contact details of person dealing with report	Stephen Herbert Senior Adviser, Evidence Services Mail Hub, Natural England County Hall WR5 2NP stephen.herbert@naturalengland.org.uk
Link to published statement about the breach (if relevant)	None published
Date of report	25 September 2017

2. Circumstances of breach

Relevant principle/protocol and practice	Principle 5 / Practice 2 Keep confidential information secure. Only permit its use by trained staff who have signed a declaration covering their obligations under this Code.
Date of occurrence of breach	8 May 2017
<p>On the 8th May 2017 the results from the seventh year of the Monitor of Engagement with the Natural Environment (MENE) survey, including associated data files, were published by Natural England. This inadvertently included postcode details (full home postcode of respondent, the easting grid ref of the respondent's postcode centroid and the northing grid ref of the respondent's postcode centroid) for approximately 300,000 respondents interviewed since 2009. This data was published on Natural England's publication catalogue and linked from GOV.UK. As the information published solely related to geographical attributes of the survey participants, it was assessed as being non-sensitive.</p> <p>The error was due to a version control issue, with the wrong files being mistakenly uploaded on the website. The breach was identified on 14 June data was promptly removed from the website within 24 hours.</p> <p>Given the non-sensitive nature of the information published, Natural England and their contractors have concluded that this breach of the Data Protection Act (1988) was not sufficiently serious to warrant notifying the Information Commissioner's Office (ICO).</p>	

3. Impact of the breach

In total there were 597 downloads of the data files. As the data is freely available to download from GOV.UK without restriction or registration, it is not known precisely how many of these downloads were unique, nor is it possible to contact any of those who accessed the data.

Natural England is confident that the impact of the breach is low and no direct complaints have been received relating to the publication of this data.

The postcode data released is very unlikely to allow individual survey participants to be identified because postcodes typically represent about 15 delivery addresses. However, there are instances where only a single delivery address is associated with a postcode so this possibility cannot be ruled out completely, but even in this situation the associated personal data is not highly sensitive and so this can still be considered a low risk.

Since the data isn't sensitive it is highly unlikely there would be any particular risks to a respondent, even if re-identification was achieved.

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

The responsible Statistician arranged for the data to be removed from public access within 24 hours of the breach being notified on the 14 June 2017. The survey contractor (also the data controller) was notified, and an internal data security incident report was filed which triggered a subsequent internal investigation. In order to prevent a repeat occurrence, Natural England has implemented the following measures:

1. Establish a formal review/approval process for datasets prior to publication (and apply to the publication of the revised data), updating relevant guidance as required.
2. Clarify who is the Information Asset Owner for MENE data and update internal records accordingly including notifying NE Security.
3. Review information security awareness within the team to ensure that staff are aware that information security breaches should be reported to the Security Team immediately and that an incident report form should follow.

A revised dataset is currently undergoing quality assurance prior to publication on GOV.UK shortly.

Natural England considered consulting the individuals affected directly to notify them of the breach, but this would not be possible as personal data associated with the files is routinely destroyed. Moreover, as the number of respondents is considerable, the administrative and financial burden of contacting each respondent would be enormous with the risk of causing unnecessary alarm, which would undermine participation in surveys of this type in the future.