

19 July 2022

Data Leak re Recovery College - Additional information

1) A copy of all documents relating the self-reporting of the data leak re the Recovery College.

The self-reporting of the data breach was communicated by the Trust to the ICO, you will have received this from the ICO as part of a recent FOI request. If there is further information you require please advise.

Please supply your set of documentation (including any supporting data in preparation of and in relating to the submission and following the reply from the ICO) which will be different from that received from the ICO.

- Please see attached a response from the ICO and a copy of the action plan that summarises the work being carried out.

2) How many people are affected by this data leak?

Between 31.07.20 - 01.03.22, 1004 students may have been affected, please note that students in each Ms team course may or may not have had access to the email addresses depending if a mobile or laptop/desktop was used. It has not been possible to ascertain how many accessed the recovery college courses this way.

The RC commenced online classes before 31.07.20. What is the significance of this date?

- The current use of Online MS teams courses started on this date. From late April 2020 to 30th of July 2020 the College used MS live teams which was a different system which is a more restricted version of MS teams.

3) How was the decision not to notify data subjects reached?

Data Subjects have been notified of the difficulties that have pertained in relation to the use of the mobile app, the Recovery College wanted to be sure of the guidance being provided before communicating out to students and this involved liaising with Microsoft and testing solutions.

It then transpired that at least some classes organised around the time of issue of the letter were still leaking data.

How was the risk of this happening assessed?

At what level was the decision made to proceed with MS Teams, considering that neither could the already existing leaks be fixed nor had, at that time, a way been found to prevent new leaks.

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- When further issues were identified issues work around solutions were developed and rolled out

4) How was the decision to use this piece of software for the RC reached? Has a risk assessment been carried out?

The move to virtual events was initiated by Covid-19 pandemic and inability to host in person sessions. Without the use of MS teams the courses could not have run. This was initially facilitated by Microsoft Teams Live events, and then moved to Microsoft Teams Meetings. Microsoft Teams is the core communications application used by the Belfast Trust. The regional strategy is to deploy Microsoft Teams across all Trusts in Northern Ireland this will be completed in 2022.

The technical solution has been subject to a data protection impact assessment and cyber assessment.

A data protection impact assessment (DPIA) was carried out for CAWT EU Interreg VA Innovation Recovery Project for the three Trusts that were involved with the project.

Has the use of a safer, more user friendly, alternative (such as Zoom, which all the other NI trusts seem to use) for the use with outside participants, been considered Initially?

- No, Belfast Trust already had MS teams in place

When you were alerted by a service user that the application is disclosing email addresses and sensitive personal data through the chat?

- MSA teams is being rolled out through all Trusts this year and this has been the platform that the Trust used.

When the Trust realised that the issue was ongoing?

- Solutions were developed to mitigate against risks identified.

5) How was the decision to continue to use it reached? Has a risk assessment been carried out?

Microsoft Teams is the core communications application used by the Belfast Trust and the regional strategy is to deploy Microsoft Teams across all Trusts. Following the incident referenced above additional training, controls and processes have been agreed and implemented with the recovery college. A DPIA was completed and is now being reviewed in the light of the data breach issues.

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Does the Trust consider this data breach as stopped?

- All steps have been taken to reduce the risks, there is still an issue with a small number of historic courses that we need to review with Microsoft and need to take further action in relation to these

Is the Trust confident that no new data leaks will occur through the use of Teams?

- Yes, the Trust is content that the new process as developed will mitigate the identified risk

6) What other outside online event has Teams been used for?

This data is not held by the Trust

Various Trust-sections offer online classes, which a quick internet search will reveal.

What efforts were made to identify these online classes?

Were staff in the appropriate services briefed and retrained?

Were the participants advised?

- New guidance has been made available to all staff in the Trust outlining best practice for setting up sessions with external individuals. There has been no other complaints received in relation to data breaches.