

COMPLIANCE WORKING RECORD

Personal data breach triage and notification decision record

ICO notification route indicated. 1 action-required and 0 unresolved findings.

Document control

Field	Value
Organisation	Northfield Services Ltd
Document type	Breach response working record
Document reference	PDB-2026-014
Jurisdiction	United Kingdom
Version	2026.08.07
Status	Action required
Classification	Compliance working record
Prepared by	Data Protection Lead
Prepared on	21 August 2026
Rule pack	2026.08.07
Sources reviewed	7 August 2026
Generated	21 August 2026

Recorded matter

Field	Value
Organisation	Northfield Services Ltd
Reference	PDB-2026-014

Field	Value
Owner	Data Protection Lead
Summary	A support export containing customer names, email addresses and case notes was sent to the wrong business contact. The recipient confirmed deletion and supplied written confirmation.
Jurisdiction	United Kingdom

Decision

ICO notification route indicated

The recorded assessment says risk to people is likely.

- Prepare and submit the ICO notification without undue delay and, where feasible, within 72 hours of awareness.
- Record any information supplied in phases and the reason for delay if the 72-hour period is exceeded.

72-hour deadline
9 August 2026 at 09:15 BST

Incident classification

Check	Answer	Record status	Evidence
Personal data breach confirmed	yes	recorded	Incident review confirms unauthorised disclosure of personal data to an external recipient.

Risk assessment

Check	Answer	Record status	Evidence
Risk to people is likely	yes	recorded	The case notes may reveal service use and personal circumstances. Prompt deletion reduces but does not remove risk.
High risk to people is likely	no	Action required	No special-category data, credentials or financial data were included. Recipient deletion was confirmed within 50 minutes.

Response record

Check	Answer	Record status	Evidence
Immediate containment actions recorded	yes	recorded	Export access withdrawn, recipient contacted, deletion confirmation retained and mailbox rule corrected.
Notification information assembled	yes	recorded	Draft includes the breach nature, 127 affected people, data categories, likely consequences, containment measures and DPO contact.
Affected-person communication prepared	Not applicable	Not applicable	High risk is not recorded. Communication will be reconsidered if new facts emerge.

Accountability

Check	Answer	Record status	Evidence
Breach register entry created	yes	recorded	Register entry PDB-2026-014 records chronology, decision owner and evidence references.

Approval record

Decision owner	Decision	Date	Signature
Data Protection Lead	To be approved	To be completed	To be completed

Assumptions

- The organisation and responsible owner supplied the recorded facts for reference PDB-2026-014.
- No answer has been inferred from a blank or uncertain response.

Limitations

- This tool does not decide whether an incident is a personal data breach or whether risk is likely. Those facts must be confirmed by an authorised person.
- The 72-hour time is elapsed time from the recorded awareness time. Weekends and public holidays do not pause or extend it.
- Sector-specific reporting routes and duties require separate review.

Official sources

Source	Provision	Date	Link
UK Parliament: UK GDPR, Article 33	Notification of a personal data breach to the supervisory authority	7 August 2026	https://www.legislation.gov.uk/eur/2016/679/article/33
UK Parliament: UK GDPR, Article 34	Communication of a personal data breach to the data subject	7 August 2026	https://www.legislation.gov.uk/eur/2016/679/article/34
Information Commissioner's Office: Personal data breaches: a guide		7 August 2026	https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/personal-data-breaches-a-guide/
Information Commissioner's Office: 72 hours: how to respond to a personal data breach		7 August 2026	https://ico.org.uk/for-organisations/advice-for-small-organisations/personal-data-breaches/72-hours-how-to-respond-to-a-personal-data-breach/