

# Data Breach Response Procedure

## ADR Carriers Limited

### Company details

ADR Carriers Limited  
Church View, Newton Arlosh  
Wigton, Cumbria, CA7 5ET  
Registered in England & Wales: **14798586**  
Email: [hazload@adrcarriers.net](mailto:hazload@adrcarriers.net)

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### 1. Purpose

This procedure sets out how ADR Carriers Limited identifies, manages, investigates, records, and reports personal data breaches in compliance with the UK GDPR and the Data Protection Act 2018.

The objective is to:

- Contain and minimise the impact of breaches
  - Protect individuals' rights and freedoms
  - Meet statutory reporting obligations
  - Demonstrate accountability and compliance
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### 2. Scope

This procedure applies to:

- All employees, directors, contractors, and agency staff
  - All personal data processed by ADR Carriers Limited
  - All formats of data (electronic, paper, verbal)
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### 3. Definition of a Personal Data Breach

A personal data breach is any incident leading to:

- Accidental or unlawful destruction
- Loss
- Alteration
- Unauthorised disclosure of, or access to, personal data

Examples include:

- Sending personal data to the wrong recipient
  - Loss or theft of devices or paperwork
  - Cyber-attacks, malware, or ransomware
  - Unauthorised system access
  - Accidental deletion of records
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## 4. Roles & Responsibilities

### All Staff

- Must report any suspected or actual data breach immediately

### Management / Directors

- Responsible for assessing, managing, and reporting breaches
- Ensure corrective actions are implemented

ADR Carriers Limited does not currently appoint a formal Data Protection Officer; data protection oversight rests with company directors.

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## 5. Immediate Action (Containment)

Upon discovering a breach, the following steps must be taken immediately:

- Stop the breach where possible
- Secure systems, devices, or documents
- Recover data if feasible
- Disable compromised accounts or access rights
- Preserve evidence for investigation

No attempt should be made to conceal or delay reporting.

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## 6. Internal Reporting

All breaches must be reported **without delay** to:

**Email:** [hazload@adrcarriers.net](mailto:hazload@adrcarriers.net)

The report should include:

- Date and time of discovery
  - Description of the incident
  - Type of personal data involved
  - Number of individuals affected (if known)
  - Immediate actions taken
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## 7. Risk Assessment

ADR Carriers Limited will assess:

- The nature and sensitivity of the data
- Whether special category data is involved
- The number of individuals affected
- Potential harm (financial, identity theft, distress, safety risks)

This assessment determines whether the breach is **reportable**.

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## 8. ICO Notification

Where a breach is likely to result in a risk to the rights and freedoms of individuals:

- The Information Commissioner's Office (ICO) will be notified **within 72 hours** of awareness
- If notification is delayed, reasons will be documented

Non-reportable breaches are still recorded internally.

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## 9. Notification to Individuals

Where a breach is likely to result in a **high risk** to individuals:

- Affected individuals will be informed **without undue delay**
- Communication will be clear and plain-language
- Advice will be given on steps individuals can take to protect themselves

Notification may be delayed only where permitted by law.

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## 10. Documentation & Record Keeping

ADR Carriers Limited maintains a **Data Breach Register** recording:

- Facts of the breach
- Effects of the breach
- Decisions taken
- Remedial actions

This applies to **all breaches**, including those not reported to the ICO.

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## 11. Remedial Actions

Following a breach, ADR Carriers Limited will:

- Identify root causes
  - Implement corrective actions
  - Update policies, procedures, or systems
  - Provide additional staff training where required
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## **12. Confidentiality & Non-Retaliation**

Employees reporting breaches in good faith will not face disciplinary action. Failure to report a breach, however, may result in disciplinary measures.

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## **13. Review & Testing**

This procedure is:

- Reviewed annually
- Updated following any significant breach or legal change
- Tested periodically through internal review

**Last reviewed:** December 2025

**Next review:** December 2026