

URGENT RESPONSE GUIDE FOR UK ORGANISATIONS

Personal data breach

Your first 72 hours

Contain the incident. Establish the facts. Assess the risk.
Meet the reporting deadline.

THE FIRST 72 HOURS FROM AWARENESS

Move quickly, but keep a clear record of the facts, decisions and actions taken.

01

Take control

Appoint an incident lead. Preserve evidence, limit further loss or access, and involve the right internal teams and suppliers.

02

Establish the facts

Confirm what happened, when it began, which systems and data are involved, who may be affected and what can be contained or recovered.

03

Assess the risk to people

Consider the sensitivity and volume of the data, possible misuse, the people affected and whether containment has reduced the risk.

04

Decide, notify and document

Make the reporting decision before the deadline. Record the reasoning, the information available and any follow-up action still required.

THE REPORTING DECISION

NOTIFY THE ICO

If a risk to individuals is likely, notify without undue delay and, where feasible, within 72 hours.

TELL INDIVIDUALS

If a high risk is likely, inform the people affected without undue delay and explain protective steps.

KEEP A BREACH RECORD

Keep the facts, effects, remedial action and reasons for the reporting decision.

Report early and update later if important facts are still being established.

HOW WDPS CAN SUPPORT YOU

- **Breach assessment** Confirm whether the incident involves personal data and the reporting threshold.
- **Regulatory response** Prepare ICO notifications, affected-person communications and decision records.
- **Follow-through** Support investigation, remediation, lessons learned and improved response procedures.

Urgent breach advice

Solicitor-led advice on reporting, notification and next steps.

[Speak to us about the incident](#)

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