

05 January 2026

**ICO Reference Number: IC-436151-G2V1**

Dear Toni Ann Critchlow,

I am writing about the personal data breach you reported on 11 October 2025.

Thank you for the information provided.

**Data security requirements**

You must have appropriate technical and organisational measures in place to protect personal data. Personal data must be processed in a manner that ensures the appropriate level of security is applied depending on the type of data you process.

**Our decision**

We have considered the information provided and we have decided to close the case and provide you with advice. This decision is based on the information we have recorded about the breach.

Please note that we may make enquiries if we become aware of new information that affects the circumstances of this case, including if we receive complaints about the breach.

We advise that in response to a personal data breach you take reasonable steps to contain the incident. We also advise that you consider any steps you can take to mitigate the impact and support the affected individuals.

Please check that your policies and procedures are fit for purpose. All staff who handle personal data should receive data protection training regularly and where possible this should be role-specific. If you haven't already done so, you should investigate the root cause of the incident. This can help you to identify any additional security measures that can be implemented to prevent a recurrence.

We deal with thousands of personal data breach reports each year. In many cases, the breach could easily have been prevented. Please read

the attached leaflet, which contains our tips for preventing the most common personal data breaches. If you're not doing these things already, please consider implementing them.

Please also note that as a result of a breach an organisation may experience a higher volume of complaints and information rights requests. If you receive complaints these should be initially dealt with through your internal complaints procedures. You should not refer them to the ICO as a matter of course. Although if an individual is not happy with your response they are able to raise a complaint with us.

Thank you for reporting the breach. Further information and guidance relating to [personal data breaches](#) under the UK General Data Protection Regulation (UK GDPR) and [data security](#) is available on our website.

We now consider the matter to be closed.

Yours sincerely

Stephen McCardle  
Case Officer