

APCS Data Breach Zoom drop-in

Introductions

So just to start off with introductions, I'm conscious that you might not know all of us here present. my name's Charnelle Stylianides, and I'm the director of People for the Diocese, which means that I have oversight of HR, safeguarding and equality, diversity and inclusion.

And on this side of me, we have Jane Appleton, our director of communications.

And to my right, we have Philippa White, who's the Bishop's Chaplain.

Also on this call, but who you might not be able to see on your screen, are Fiona McGrady, and as part of Fiona's role, she has, the, the role of data protection oversight for the diocese, and particularly for DBF, and also Charlotte Wilmshurst, who is the area safeguarding advisor for Berkshire, but who's attending the call, and will be happy to pick up any specific questions, if it will be helpful to you.

So, Bishop Steven and Mark Humphreys, our diocesan secretary, are sorry not to be here, but they wholly endorse us coming together. They're aware of this call, and are keen that we're able to talk together about the impact of the data breach, on all of us in, in a number of different ways.

But before we begin, I wonder if I could ask you Philippa, to open in prayer for us.

Prayer

Of course. So as we gather, let us place ourselves and this meeting into the hands of God.

God of wisdom and compassion.

We know that we belong to a world that falls very short of your kingdom of justice and peace.

And that has been brought home to us starkly with the data breach that has affected us all.

We bring to you anger and anxiety, confusion and fear.

And we ask that in this meeting, all that we say may be heard and understood.

We bring to you all those who work at APCS and Intradev, as well as those in this diocese and elsewhere who are working hard to understand and rectify what has gone wrong.

And we bring to you all those who carried out the hack asking that you would turn their hearts from evil and bring them to your light.

Finally, gracious and compassionate, God, we entrust to you all those in our parishes and communities whom we seek to keep safe as we look for the, for the way forward from this setback, let us not, not lose sight of them and of our responsibility towards all those whom we serve.

We ask all this in the name of your son who made himself vulnerable for the sake of your people.

Jesus Christ, our Lord.

Amen.

Agenda

Thank you, Philippa.

Before we begin, perhaps I can outline, a sort of a short agenda for today. In a moment, I will invite Jane to read a few words from Bishop Steven, after which I think it might be useful to ensure that, that we have, a shared understanding of, of what we're here to talk about today, for me to perhaps give a summary, of, of events as we know them thus far.

But what I'd really like to do is to spend the vast majority of our time together hearing from you. and I'd really like us to share our experiences with one another, but also to feel able to ask questions.

And I have no doubt that there will be many, some of which we will be able to answer today, and some of which we might not. but which we, between myself and Jane Charlotte, Fiona and Philippa, we will endeavour to take away, and to obtain responses to for you. so I hope you'll find this to be a really fruitful and constructive session. So Jane, could I invite you to read Bishop Stevens words?

A message from Bishop Steven

Thank you, Charnelle.

Bishop Steven's in the House of Lords today. Otherwise, he would've been with us, but he's asked me to share this with you dear friends and colleagues.

You'll be aware that a significant number of staff, clergy and volunteers across the diocese have been affected by the APCS data breach related to DBS checks. APCS is a third party provider and the breach has been beyond our control.

However, on behalf of the bishops and the diocese, I want to say how sorry I am that this has happened, and for the time and trouble this will have caused many people, colleagues in the diocese have worked extremely hard to reach out to those affected and will continue to do so.

We are also working hard to set alternative arrangements in place for DBS checks to resume in the very near future.

Thank you for all you continue to offer and for your commitment to safeguarding.

With kind regards in my prayers, Steven.

Summary of events

Thank you, Jane.

And I would really strongly like to echo, Bishop Steven's words to say that we really do not underestimate the impact of this situation on all of you and so many others around the diocese in different ways, whether as individuals, your personal data has been compromised, whether in your role as volunteers, staff, or clergy. The work that you are seeking to do and the people whom you are seeking to serve, is, is being hindered by this situation.

And also to, to the staff, across the diocese who are working so hard to ensure that we're all kept safe. So to say that we wholeheartedly share in this with you, and are, are really seeking to try to bring about, a comfortable resolution for everyone.

So before I hand over and invite you to, to share your views, thoughts, feelings, and questions, perhaps it will help for me now to, to, to give you a short summary of where we're at.

It might not cover every aspect, but it's perhaps a good place to start.

In late August, we learned that APCS, our data processing provider had, through their external software company called IntraDev, experienced a cyber attack.

So it was IntraDev's systems that experienced a cyber attack.

And they became aware of this on the 15th of August and informed APCS on the 17th of August, APCS then issued a notification to some affected client organizations.

On the 20th of August, the diocesan safeguarding team received confirmation of the breach and a list of effective parishes within the diocese, as well as ODBF APCS accounts from APCS on the 22nd of August.

So you'll note that there was a sequential, cascade of information sharing, and that many of you will have been made aware of the breach before the diocesan safeguarding team and diocesan officers were made aware.

The data breach in question is thought to affect DBS checks requested from APCS between the 8th of November, and the 8th of May, according to APCS parishes in our diocese have been affected, and just over people have been affected more widely.

We are aware that somewhere in the region of between to other diocese have been affected by this because they are also APCS clients. And we know the national church institutions themselves, who are also APCS clients have been affected.

Pausing work with APCS

Coming now to, an issue that may be a significant one for all of you, which is the diocese rationale for recommending, that any work with APCS is paused, I'd like to talk you through our thinking around this because it's not a decision that's been taken lightly, and it's been taken despite knowing that in the short term this might cause significant disruption, for the activity, a range of activities across our diocese. and I suppose our challenge is that we're trying to balance safeguarding risk, which is the main reason for DBS checks being undertaken in the first place versus information security risk.

You know, we are subject to GDPR legislation and RED regulations which place this obligation on us and on APCS and on their partner organizations.

So there's that risk to be held in balance.

And alongside that, we're, we're trying to hold, the operational risk as well of by making the decision to pause DBS administration, that that will mean that sometimes we're putting ourselves in a position of not delivering on activities that we've committed to, or activities that are particularly important to us, as a diocese and in and in each of our parishes. so just to reiterate, this isn't a decision that we've taken lightly.

However, we have taken advice from information security experts in the first instance. because what we do know is that APCS is undertaking quite a complex investigation, alongside Intradev their supplier.

And that will take time because the, there's a degree of sort of forensic diagnosis that needs to take place.

And once that has taken place, we will hope to hear from IntraDev and from APCS as to exactly where the weakness in their system lay, what they're doing to, to take corrective action or indeed what corrective action they may already have taken and how indeed all of their systems have been audited to ensure their safety. and more importantly, to ensure the safety of, of all of our data.

And what is, from a due diligence point of view, really important is for us to receive assurances from a reputable, independent third party, perhaps an expert consultancy firm, whom APCS are, are working alongside. we know that A-P-C-F-A-C-P-S have ISO accreditation and, we know that the ISO organization will be closely looking at and scrutinizing the forensic investigations that are taking place. and therefore we hope that with that independent set of eyes on this investigation, we should be able to receive information from APCS that we hope will be reassuring.

But at this moment in time, we don't have access to because it is still ongoing.

Therefore, we've concluded that pausing activities until the conclusion of that investigation is really on balance, the responsible course of action to take. and we really hope that it will be as, as minimal as possible, in, in order to, to, to reduce the disruption to, to the activities that, that we have. also just to say any activities that we already have in train with APCS.

So you, you or, or colleagues may have, submitted renewals or new applications, to APCS recently. being pragmatic, we recommend that those continue.

The data has now already been shared with APCS, and therefore, you know, we, we, we, we don't, anticipate needing to ask those activities to cease.

So it's simply new renewals and new applications that we at the moment recommend that, that, that those ceased.

Alongside this, we are actively investigating interim solutions for DBS processing, and, I've explored a number of different channels, which if it's of interest to you, I'm happy to talk to further. but what we are asking of all of you is that if you have an urgent activity that requires immediate attention, please do draw this to our attention using the DBS inquiries email box. we will triage that, and evaluate any, inquiries that are coming through, and we'll advise on a case by case basis depending on the nature of your query. but we absolutely are here to support and walk alongside you, through this situation.

So I think I've, I've spoken a lot now and I'm really keen not to erode the time that we have left.

So, may I hand over to, to you and invite you to, to raise any thoughts, comments, feelings, questions, that you might have for us?

Questions from the floor

Reporting to the ICO

I just wanted, In The communications you sent out, it said that we didn't need to report it to the ICO unless the individuals were kind of high risk for their data.

I just wanted to check in with that. Is that still the case that we as individual churches don't need to report it because it has been reported kind of further down the chain?

Answer:

Rosie, the situation is that each PCC is a data controller for the checks that it carries out with APCS. and as the data controller, the PCC needs to assess whether the risk to the individuals is high or not. that's the case with any data breach. you need, as the data controller, need to go through the process of assessing the level of risk with the breach. the ICO has an online tool to help you with this, and it takes you through a series of questions, and that then it provides a, an answer as to whether this, would count as a high risk breach or not. it might help you to, know that, when we reported to the ICO, we did consider this a high risk because of the nature of the data that was breached for the individual's concerns, but officially the processes that each data controller should make that risk assessment.

So that's why the advice was, couched in that way.

Thank you, Fiona.

That's really helpful.

Independent companies

Allison's, I Thank you. yes, I think to say that people are upset and angry is a bit of an understatement amongst the people affected in our church. And, I have a lot of questions and I don't want to take over this whole discussion 'cause I'm sure everybody's got lots of questions. So just some initial ones.

You said you, hope that you'll get, answers, you'll, you'll want some independent, reassurance from an independent company working with APCS. Do you know they are working with an independent company? Have you got the name of who is going to be looking at all this?

Who and is acting as an independent company in this, or are you assuming that they will be? thank you.

Answer:

That's a really valuable question.

And, and Alison, first of all, to address your, the point that you began with, we are so sorry and we share in the upset, the frustration, the anger, the sadness and concern, given the nature of the, the, the data that has, you know, made its way into the hands of, of, of people who really shouldn't be having it, through, a supplier relationship that has worked so well for many years, and that it, that we have trusted for so many years.

So, to, to move to your second point, we can't be complacent and we can't make assumptions, which is one of the reasons we've had to make the difficult decision to cause our activities. in relation to, the independent verification, it's hugely important that whatever conclusions APCS reach, that they are evidence-based, and that there is a way of checking and verifying that they are reasonable and that they're verifiable.

So we know, and APCS have informed us that they're working with, a data protection specialist to inform their approach to this investigation.

We don't know, and I haven't asked, but I'm, I think it's important that I do ask the as to whether they're working with information security specialists from a cyber perspective to ensure that again, any weaknesses in their systems have, have meaningfully been addressed. so from, from that point of view, you are absolutely right and we can't be complacent and make assumptions and about the conclusions they may draw.

APCS initial evaluation

And, another question I've been asked by a few people is, how was APCS evaluated in the first place as a suitable company to be having all our personal data?

They're very small company, they have less than employees, they don't have to submit their own accounts because they're so small.

And there's just a concern of why, why were we using them?

I know you've said we've had a long relationship with them, but what, due diligence was done when these were picked as a supplier in the first place?

Answer:

So Alison, in response to that, a procurement exercise was undertaken. that was, so this was undertaken, probably in about or , because we know that the contract with APCS began in. And what I also have been able to find out is that, the procurement service department in the ncis, the National Church institutions, supported that exercise.

Unfortunately, I don't know the specific details of what that entailed. and I don't think at this point that we, we hold the information around the detail of that activity.

But I am aware that due diligence was followed, by both the diocese, with the support of the NCIS to engage APCS as a supplier. as I mentioned, the NCIS themselves use, use APCS as do a number of other diocese alongside local authorities, and educational establishments as well.

So in terms of the, the, the range and the breadth of their, their client base, it's relatively significant now that isn't in, in any way intended to diminish what has occurred. and it's important that whatever way forward we choose to move, whether it's to continue with APCS or to find an alternative solution, that we absolutely all are assured about the rigor of, of the process that, that we undertake.

So, Alison, sorry, I don't want to dodge the question that you've asked, but I don't have sort of the full possession of the facts apart from knowing that a procurement exercise was undertaken.

Thank you.

APCS recommendations

I can understand the reasoning for suspending work with APCS in the interim while the research is done.

But I would like to say having worked with a number of different organizations doing DBSs over nearly years, I would say APCS is by far the most efficient and economical, that I've worked with.

And they're very thorough and I would hope that we would continue with them. I presume one of the questions is how come their data was lodged with IntraDev? and you know, why, that answer, I haven't heard, seen that answer yet. but it sounds as though APCS themselves are clean. and so I'd like to sort of hope that we don't go away from APCS 'cause I think we'd be hard pressed to find something better.

Answer:

Thank you, Roland, for, for your, for sharing your feedback and, and your experiences of APCS, to address the point that you raised, around why IntraDev held that data on their servers.

That's one of the significant parts of the investigation, that is being undertaken because that wasn't part of the agreement between APCS and IntraDev.

So they were, enabled to, to process that data, but not to store it.

That wasn't part of the deal.

So they are seeking responses from IntraDev as to why that was the case. and, that therefore means.

So just to add that as part of, of working that out, IntraDev have assured APCS that they have deleted all that data now. but APCS have retained it for the purposes of the investigation, which isn't yet concluded.

So it's retained on, the APCS servers, as is much of our data because they continue to process our new applications, and our renewal.

So they're required to hold some data, but IntraDev isn't.

And so that's where we hope, the, the inquiries will, will, will provide us some answers as well as some answers as to whether, APCS will continue to do business with IntraDev.

But you know, that's a matter for them and, and for them to be able to provide reassurances to us about if in, if that relationship does indeed continue.

But thank you for your really helpful feedback. and thank you, Sue, in the comments as well for, for sharing your responses, and your experiences about excellent customer service and efficiency, from APCS, which is why we're really keen not to be too hasty, to, to sever the relationship with them. we really do hope that there might be a way to, to resolve it, but, but we're keeping all options open and on the table for now.

In progress cases

We've got two cases that are currently at the ID verification stage, and I'm ready to press the button on those.

So am I correct that I continue to do that with these two, but we don't take any new, renewals or any new cases through the process until further notice?

Is that correct?

Answer:

I, I, I, I I would suggest that that's correct.

Thank you, Suzie.

Communications

I would just echo to start with what, Sarah said as well about very upset and angry, affected people here. My question is slightly, is around some of the communication that's come out from, from the diocese or not come out from the diocese. so I myself have, have had my data breached and actually received a direct notification from the diocese that my data had been breached with the link to, Experian.

But none of the other people in my parish have received that.

And now we've had communication that actually we are to send that letter out ourselves. And I think that communication came through last week while was away, but that's quite a delay from when I was notified by the diocese towards the end of August that my data had been breached personally with the link.

And my colleagues have questioned why, why have they not been notified and why so long?

Answer:

The reason that we, responded I wrote to you directly was because your, I'm assuming that your DBS check was done through one of our area offices, because you're a clergy person with us, right?

For those whose checks are done through the parishes, that is data that the PCC controls, and therefore their relation is directly with APCS. So we, we asked APCS to send a list of affected individuals to each account manager.

So for the DBS checks that we do through area offices and other teams within ODBF that came to us, but for checks that are done through parishes that went to the parish APCS account manager.

And that's not data that should come through us because it's not data that we should be processing because those industries don't do their checks through us.

So, we asked APCS to do that, to coincide with our letter going out to you with the information about responding to this template letter to share with those individuals. So I hope that helps explain the, the difference.

Verifiers

I'm a fairly new church warden and I'm the only one from RSK coming online today.

What's, and I'm sorry, I had to take a funeral call j just at the first minutes of of the meeting, could I just clarify whether our verifier would've been sent that information for people affected - people in the congregation affected by the data breach?

I've heard that clergy have done, dealt with separately, APCS you say, should have sent to the parish, to the verifier, or who?- any names that have been, have had their data breached.

Answer

Yeah, that is correct.

It should have gone to whoever is listed as the account manager with APCS. and we, if you haven't received that, we can ask APCS to send it to you again. and we

Question:

I mean, I dunno, I need to find out who the account verifier is. Well, I know who, who does the verifying, right? and that be, be the account holder with APCS.

Answer:

We do have a list of those names. so we can, we can help with that.

Question:

So, So if they have not yet had a list of people affected, we're in the clear?

Answer:

It might be that nobody in your parish or benefits was affected, but we can check that for you.

Experian template letter

So just picking up on what Maggie said on Experian, we haven't had any sort of template letter that we could send out to people.

The only thing we have managed to pick up is the email address to send it to, but I noticed on the frequently asked questions, there's quite a lot of information about what they do.

Is it possible to build us a template or to send us a template that we can send out rather than us having to do the cut and paste?

Answer:

That's absolutely possible, Janine. and we can ensure so that there should be a link to a template, if not mistaken.

It was in the Letter that went to the account managers.

Question:

Okay. 'cause I asked our account manager and she says all she's got is the email address. we certain certainly haven't seen anything that we can send out, for that.

My other question was, as you are evaluating, APCS IntraDev, and in the future, how do you make sure that both of the, any connected supplier is fully validated?

Because as other people have said, we already have people who say they will not submit highly sensitive data anymore for a DBS check. They are extremely worried.

So before we can start using it again, we're going to need a huge amount of reassurance that this won't happen again.

Answer:

I wholly agree with those, those views, Janine. and whether it's, a resumption of business with APCS or indeed engaging a new supplier, in, in either of those instances, it is highly likely that, the electronic DBS application service will continue because it brings many efficiencies, but that can't come at the cost of information security. And so one of the ways in which to do that is knowing that, the firm that we use, whether it's APCS or another firm, has independent accreditation such as ISO, on this occasion, APCS holds that accreditation.

But we're not sure if IntraDev do, neither do we have visibility of the data processing agreement and information sharing agreement that exists between IntraDev and APCS.

So in the procurement exercise, whether that's to retain APCS or otherwise, we absolutely will be scrutinising all of the sub processing relationships that might exist in the supply chain of our main provider. And we, will, with the help of the NCIS procurement department, and ensure that there is robustness around that, that the checking of, of, of those relationships, as well as the, the checking of, of information and IT systems as well.

Question:

And I would suggest that there is a fairly regular review, so not an initial contract, but something that does need whether annual or every second year sort of review of, have you got a new subsupplier that we know nothing about?

Answer:

You are quite right. Absolutely. Building in those, those audit points is so important.

Question:

My second question is, we've got two people who have been caught because their applications weren't completed. So the data's two years old, but they were still there. Can we please see through that we do not expect data to be held that long because APCS won't process them anyway.

There's nothing that takes that long that almost the six months deadline needs to apply to all data and not things just left hanging.

Answer:

Thank you, Janine.

Fiona, are you able to, to comment on the, the policy around, time spans for retention of data?

Yes. We, we did ask APCS about this because we had understood as well that it was checks done within a certain period, and that they only retained the data for six months.

But they told us that if, a check wasn't, if a DBS wasn't issued, or there was some problem that where it didn't go through completely, they kept the data for two years, and that was their retention period for that category of data. So I I, that that's, that's the information they provided us with.

But I do understand your, your concerns around that.

Question:

So Yeah. 'cause there, there's no means for us to say, cancel the, this particular application or anything.

You know, it just, it's been sitting there for, obviously for more than two years.

Answer:

Thank you. And that's something that we can follow up with APCS. So thank you so much for raising that and making us aware of it, Sue.

Lack of confidence

I, I just wanted to ask going forward, we, we've spoken previously about lack of confidence. I mean, I've got, at the moment, two authorized ministers that need their DBS updated, and they're both, well, in any case, I'd advise them that we, we hang on. but they're not very keen to pursue it anyway at the moment.

But also what do we do in the case of, PSOs who have now relinquished their roles, our area Dean, who has, a benefice with how many churches, eight churches, all of her

PSOs have resigned. And at the moment, she doesn't have any admin support either, and neither does she have, neither do we have a secretary for our deanery that we could call on to step in and help.

Has anyone, any idea how we can move forward at this difficult time, because obviously with the situation as it is at the moment, folks are gonna be very reluctant to take on the role of PSO.

Answer:

So could you tell us where you are?

Question:

I, I'm Shires Edge benefice. I've got five churches that, we cover the Ironstone benefice is the benefice where all of the PSOs have resigned.

Answer:

Sue, I'm so devastated to hear that. and, and I wholly understand, that, that the loss of confidence that this situation has given rise to, and I'm so grateful to, to those PSOs who, who are continuing to want to work through this with us, but wholly understand why some will feel unable to do that. that's a desperate situation that you are reporting.

And if it's all right, what I'd like to be able to do is ask a member of our safeguarding team to get in touch, with Ironstone benefice separately, to talk through what the possible options might be.

But thank you for making us aware of that.

Passport concerns and Experian

Thank you for your time. it's myself, Steve Upton and my wife Stella. Stella's data was the one that was, was breached. we've done a self-assessment of risk. specifically we are co-directors of a small business. it's small, but the financial consequences of a data breach would be more significant than a typical domestic current account. so we believe we're in a position that's, that's, that's challenging in the respect of that.

We also travel, and in the coming three months or so, we're traveling out to the Middle East where if a passport number was red flagged for other reasons, we may end up being retained not for our own cause. So our first course of action might be to get a new passport for Stella. So that doesn't happen when we travel.

But secondly, we've looked at the Experian, website. you can register as a free trial, but it gives you no more than just a code, a score if you like, no background to that score. you'd have to monitor that the score changed, and then ask the question why.

So my question is, if we look at the different levels of Experian registration, I don't believe we need the credit expert, but the identity plus offers fraud alerts and dedicated fraud support. Would that be the level that we would need to sign up to?

And if yes to each of those things, how do we go about receiving compensation for the costs of doing this? Please, sorry to cut to the chase, but, but the, the horse has bolted.

We appreciate what's happened.

We are with everyone in terms of sympathy and regret and concern and anxiety and appreciate there are significant issues going forward. But having done a risk assessment, what can we now do to prevent this becoming a bigger issue?

Answer:

Thank you so much for, for raising those questions, which I have no doubt are in the minds of others as well.

To come first to your question about Experian, we believe that identity plus is the service that can be accessed free of charge and, and you shouldn't need, to be, to be paying for that. we will just double check that in terms of the code that's been provided to you, and verify that that's the case. the Experian check is that, that, that we are, offering to you is one that was put in place, for all of us by the national church institutions.

So we will go back and verify that the codes that we've been given correspond with Identity Plus, which is-

Question:

Do you mind Me just coming in at this point? 'cause I was also one of the people, whose data, I'm A PSO and my data was included.

And yes, you have to go in twice to the Experian thing once you are in with the free, free account, the, the initial set up your account, you go into your account at the top, and then you have to put in your code again to sign up for the Identity Plus, and it's all included for free. And that, that worked, but it wasn't very clear.

So I had to email out all the other people in my parish who are effected and take them through screenshots of how to do that, because it was easy to miss that in the instructions.

Question:

That that's, that's helpful.

Thank you. we haven't yet signed, sorry, we haven't yet signed up for the free account, but we'll do that. equally we don't have a code that we can find. Where was that sent?

Question:

Came in an email. and, but you had to email Experian at Oxford Diocese or something.

The diocese provided an Experian email address, and now you requested an account, and then I got sent a code.

Answer:

We are just putting that email address in the chat, so you can grab it from that.

Question:

Well, that's helpful in terms of the Experian, and thank you for answering also.

Sorry, go on.

Answer:

So I was going to come to your, your question about, your passports, and the security of passports.

So, this is something that, I've been looking at closely with the national church institutions. And the advice that we're picking up from the passport office is that because no image data was, was breached, that the risk to passports and driver's license is minimal.

And again, once again, I'm, I'm repeating the information that's been shared with me, and it's not in any way an attempt to diminish the impact, of the data breach.

Therefore, the advice that we've been given from the passport office, you know, through the NCIS, is that passport, reapplications should not be necessary as an outcome of the data breach.

However, what I would urge you to do is if we could make contact with you separately to talk about the specific circumstances of your upcoming trip, and to evaluate whether there are, there's a special case that means that in, in your situation, actually the risk to you, might well, be one that requires on balance, the app, you know, application for new passports.

Then can we take that offline, if that's all right, and explore that with you separately and, and, and work out the most effective way forward.

Question:

And who, who do we write to or do you write to us with regards to that?

Answer:

If you could write to, communications@oxford.anglican.org, then your request will be picked up from there. and we'll be able to take that forward directly with you.

Question:

And, the web address for Experian appeared and disappeared before I could write it down.

Is that also experian@oxford.anglican.org?

Answer:

It, It's still in The chat, so if you open up the chat, you'll see all of those messages.

PCC ICO reg numbers

My PSO has been great. we had a changeover when we lost the GDPR controller, so I'm everything, but does each PCC have an ICO registration number is what we need to know?

Answer:

No, you would only have one if you were required to pay a fee to the ICO.

And most PCs are not required to pay a fee. The only reasons you might need to do that are if you have CCTV or if you are trading for a profit. And that doesn't apply to most PCCs.

Question:

The second thing is, my, PSO, we've, we've, we've seen our people, we've, managed everything we're meant to manage.

But what we haven't done so far is report to ICO, because obviously I wasn't here. how, how do we do that?

Do we just, I don't know. It's basically my PSO didn't know and I don't know.

Answer:

So, there was some information I that was sent out and I think it's in the FAQs as well, on our webpage. but I'm very happy to send that to you again. we provided a template report that you could use. so I will, I will send that to you.

Investigation

I have a background of, many years in the IT industry, and also I worked for years in the, NHS as a, information governance manager where I dealt with GDPR and data protection, so on. So I'm in a position of being able to offer my local parish, advice on, GDPR related matters.

The points I wanted to make was that, whilst I understand the hurt and the lack of confidence that this has engendered, I do feel that, the investigation is going to get to the, the bottom of any wrong wrongdoing or lack of rigor in people's approach, the company's approach to, handling, our personal data, my feeling is that, no culpability ought to be attached to APCS unless, and until, the investigation might show otherwise.

I think that, that it is really the software supplier that seems on the information I've heard, to have possibly acted out of order in retain, obtaining and retaining, copies of live data from the data processor, APCS.

So it's more a case of IntraDev having a case to answer some questions to answer to the ICO rather than necessarily APCS.

But we wait and we'll find the, out the result of the outcome.

But it is indicative of a general malaise in, across the country in first of all, on one hand the competence of some people who use computers without really understanding and also the, lack of importance attached to data protection by some people within the IT industry itself.

So, you know, the two example, well, one example of that came to mine was that the MOD recently, disclosing information about Afghan refugees through, carelessness, which may cost us a billion pounds as a country.

And you know, these, the consequences of dealing with data and not understanding, what's actually involved the lack of training is, is something that causes me, a great deal of concern and companies have to act, have to, do their part in securing data.

But, there are lots of other people as well in all sorts of capacities, and we all have to pull together and, and, treat people's personal data with as much care as we reasonably can.

Answer:

Thank you, Colin, for, for sharing your, your experience and your wisdom, on this subject with us.

I think we've all benefited from, from hearing your views. and, and you are absolutely right in terms of, the, the direction of travel. we want to be proportionate and, but yet at the same time ensure that if we are to continue our relationship with APCS, that they have put safeguards in place around their relationships with suppliers and the way that information is held.

Diocesan contacts

I'd like to know who is being contacted from the diocese about possible data, their data being breached.

I can understand that clergy and people whose DBSs are being processed by the diocese, but I've had one person approach me saying, I've been told to contact you because my data might have been breached.

I've had a letter from the diocese now this person has not got no DBS got nothing else.

She has had a safeguarding issue in the past, but nothing to do with APCS.

And I'm just wondering how, how her name got into the system.

Answer:

I think I would - enews, I'm wondering if it's something in enews or if it was a general message that went round. So we contacted people whose names we were given by APCS, who they, they had, they had listed as people they considered would've been affected by the breach. and we had carried out their DBS checks and we contacted those individuals directly.

I'm not aware that we would've contacted anyone else directly.

If you ask her to, to email us, to email us or to forward us the email that she's received, that might be the easiest way of solving the problem.

We can then investigate that directly with her.

Share with her the communications@oxford.anglican.org email address.

She can forward, whatever she's received, to that address, and then we'll be able to help to get to the bottom of it.

Thank you.

Data retention

I think just to reiterate some of the comments from earlier on, a lot of anger crossness and people not wanting anything to do with APCS ever again, I take on board that that's not been everyone's experience, but, that's the general feeling.

I'm not entirely satisfied at the assurances so far about the timeline and the actions being taken by the diocese and any, requirements that we're considering the diocese is considering in the future, procurement - ie timelines.

I mean, I would rather have reassurance that as soon as a DBS check has been completed, that we want some concrete evidence or confirmation that they have destroyed all the identity documents.

I think the two year timeline is frankly absurd in holding documents, particularly when you're not even processing an application. It, it's just increasing risks and no one's going to keep track of that information safely.

Another question we had was what measures are the diocese actually taking to review their own data protection and processes?

We presume that you are, but it would be nice to have that confirmed.

Answer:

To, qualify the ques the final question that you've asked there about the diocese reviewing data protection MES measures, is that specifically in relation to safeguarding, or do you mean more generally in terms of learning from this, this situation?

Question:

To DBS or the d any personal data being held are, are the diocese policies being reviewed and their data protections?

Answer:

Yeah, but I'm happy to, I mean, obviously we we're always trying to make sure that our, they, we protect people's personal data as best we can. in terms of the DBS checks, we are, we're following the, the guidance that, Charnelle has, has already explained, to you for the DBS checks that we carry out ourselves.

I, I Mean, sure there's rigorous GDPR training for everybody who's working with purple.

We are, yes, we're going through, we're currently doing a GDPR refresher training session, well course for all staff within, ODBF and indeed ODBE, so that everyone has, is renewing their, GDPR training.

And that's not because of this breach.

We were already underway with that when we found out about this breach as part of our standard practice to make sure that everyone is aware of their responsibilities around data protection and that we take those seriously.

If I could just add to that and the point that you made around the rigor that we attach to ensuring that all our partner organisations, you know, consider GDPR and information security, you know, in the same way that we do and the high standards that we would expect, it's absolutely important that we hold everyone to account on that, you know, if they're providing a service to the diocese or to PCCs, in our diocese that require, sensitive information to be, transacted, then it's absolutely the case that we should be holding them to account.

And so, from our perspective in terms of, of the learning from this process, we, we will be holding the mirror up to ensure that, learning, you know, can be transmitted to, to all of our activities, and to all of those relationships, both informally in terms of our day-to-day business, but also in those formal, regular reviews and checks and audits of our partner organizations.

Equifax, and timeline

I think, the months free, upgrade with Experian is great, but it's not been offered with Equifax.

Now I'm understand that Equifax and Experian do not share information.

So why hasn't that offer been extended to cover both credit agencies? and I I, I'm concerned about the timeline.

The timeline that our incumbent was sent, for the breach, does not fit with the names that we were then given, which covered a wider timeline.

So again, we lack confidence that actually the timeline being investigated is, sufficiently broad and that there may well be more names that come out in the future. 'cause certainly some of our names were outside that first mention timeline.

Answer:

We agree with you. So we are aware of other situations whereby, the time period that we were notified in, in terms of the, the compromised data, doesn't necessarily sit with the names of the individuals who were notified, about their data having been compromised.

They were individuals whose applications had been processed outside of that time window.

And that's one of the questions that, you know, in a very prompt way, we threw back to APCS just to, to, to look into, and that forms part of the investigation that they're undertaking, with IntraDev.

In relation to your question around, Experian and Equifax, in the interest of expediency, the, the opportunity to access Experian was put immediately in place, by the national church institutions and extended, to all, diocese who use APCS. and I'll be really happy to take back to then the query around, the, the opportunity to access Equifax as well. and whether that will be also made available to us.

So really happy to feed back on that one.

Thank you, Anne. thank you everyone also for your patience.

I'm conscious that we've just gone past four o'clock. we're certainly happy to continue with the call if, if you are happy to continue, if you can't, please do feel free to to end now, and we are really grateful to you for having been with us, for the past hour.

New DBS needs

So if there is, a new person who needs a DBS check and we, we judge that it is urgent, we get in touch, most of our DBS checks are in fact renewals. So for the time being we needn't worry too much about those. Just hang on.

Answer:

That, that's what we're, we're suggesting, Angela. and if you are in any doubt, and equally if you'd like to make us aware of, the, the situation that you considered it to be urgent, please do, email the DBS inquiries email box and we will pick it up from there.

We will triage your, your question and we'll redirect it, to an appropriate, member of our team to, to respond to, in a prompt prompt timescale as we can.

Experian

I've just got a couple more things. people have raised that the, one year experience thing, although very welcome, that doesn't quite seem long enough.

And is there any way to push the diocese to push for that to be extended to perhaps two years or even three years? so if you are contacting them about the other organization, maybe you could ask that question as well.

Compensation

Compensation and that has been raised with me, are there any arrangements being agreed now to cover compensation for any losses that people might incur and do APCS?

Are they insured for an incident like this?

And will there be an opportunity to claim back from them if people do incur expenses?

Answer:

So that is one of the questions that we're actively exploring with APCS. and as you'll envisage every other diocese that's been affected and the NCIS themselves are exploring with APCS, so, the answer is at this point in time that, APCS haven't divulged to us their insurance arrangements, but it's certainly something that we are picking up as, as part of the, inquiry and investigation process, with regard to, to compensation.

We know that, other organizations and I, you know, I'm aware of, of organizations in the education sector, for example, who are actively in, you know, are also attempting to engage APCS in, in exactly that conversation.

So it's under review and it is actively being sought. And again, we will update as soon as we have any further news on that.

Lead diocesan contact

And is there a lead person at the diocese who's dealing with this?

So that my other, the rest of my list of questions that I don't want to take everybody's time up with today that I could send those questions to for follow up, is there a particular email address or a particular person we should send those to?

Answer:

I would really urge those to be sent to DBS inquiries. there are a number of people with access to that inbox who look at it repeatedly during the day and are able to triage and redirect any questions to the most appropriate person. the, the lead in, in, in this matter is Mark Humphrey diocesan secretary, but he has empowered, a number of us to, to act on his behalf, and therefore sending any questions to DBS inquiries means that we can, we can handle them promptly.

From the Bishop's Chaplain

Just, wanting to say that as bishops chaplain, part of my job is to be Bishop Stevens eyes and ears in places that he can't be.

So in that capacity, I, I just want to say that I have heard everything that, that you've said. I've heard your anger, I've heard your concern, I've heard your, your concern at the far reaching effects of this and at the, the ways that you feel that we are not doing enough.

And I will pass that on both to Bishop Steven and to the senior staff more widely.

And I'll also pass on to them your very sensible suggestions for changes going forward and your input about the process, about your experience of what's happened and about what, what you think needs to happen in the future.

So just reassuring you, I hope that although, none of the bishops or arch deacons are in the meeting, I have heard what you're saying and I completely understand where you are coming from and I will pass that on.

Impact on volunteering

[Question from the chat]

Answer:

I think that the question that you raised is the, the, the impact of this situation on volunteers with being willing to come forward, across the diocese.

And we are so grateful to all our volunteers.

We don't take for granted in any shape or form, the work that's undertaken by our volunteers on whom we rely and it was absolutely devastating to hear Sue's feedback, from, from her part of the diocese and what's being experienced there. so we really do want to ensure that we are rigorous in the way that, we undertake this process from here on in to, we hope, restore confidence, in the relationship that we have, with our, our, our DBS provider. you know, DBS is so integral to, to our diocesan safeguarding and ensuring that we provide a safe church for, for children and vulnerable adults and to everyone.

And so it's integral that we therefore also need to find, a, a, a trustworthy way of, of ensuring that those checks can continue, such that, we hope we'll be able to restore confidence.

I think it's probably unrealistic for me to say, and Colin may agree with this, that we in, in, in our procurement processes and in our, the management of our supplier relationships, that we will eliminate, succeed in eliminating all risk.

But actually we have to go to great lengths, to ensure that as far as is practicable, and with the resources available to us that we ensure, as Anne has already asked us to, to do, that, that we hold all of those relationships to account and that we hold ourselves to account as well.

So we hear you loud and clear. Thank you for, for raising that point.

Root cause

How, how did it actually happen that the information? That there was a data breach or is that part of the investigation that's going to take place now?

Answer:

So there's perhaps a little bit of information that, that we have received that might be helpful, Jane, be helpful. but it doesn't paint the complete picture, so, so what we understand is that, some client data, that IntraDev was processing on behalf of APCS was stored by IntraDev on their servers.

And that was in contravention of the agreements that were in place between APCS and IntraDev.

There was no reason that, APCS can, can, you know, can share with us for, for IntraDev having held onto that information, there was no requirement for it as part of the activities that they were engaging with, however it was retained. and that meant that the bad actors who then were able to access, IntraDevs servers and acquire that data, it was there for them to take possession of and really shouldn't have been. Now there's a question there as to, the robustness of IntraDevs, cybersecurity.

So that's one thing. and there's also a question for them to answer about why exactly they had held onto that, that data. and that's what, so those questions are, are what the investigation will will speak to, to, to uncover for us. So I think that's as much as we're able to share for now.

Once that's, you know, the investigation has, has concluded, we we hope to, to be able to share a, a fuller picture.

Press embargos

It's just a question that you may or not actually know the answer to, but it has been raised with me. So recently there've been a lot of data breaches, co-op land, land Rover, Jaguar's been in the news m and s, et cetera, et cetera.

They've all made national press and quite a few people have said to me, we've not heard anything about this in the national news. I'm just wondered, was there a reason for that? Has it been embargoed in any shape or form? Or, you may not know the answer to that.

Answer:

I think it's a question of scale. We have had media interest and we've responded very openly, but much of that has been from the, the faith. yes, as Angela says, it's been in the church times.

I think in terms of national organizations like m and s and Jaguar, land Rover, APCS is, is not seen as particularly headline grabbing, which I know takes no account of the distress and upset caused. But as always, if we get media interest, we reply to it in good faith. because we wouldn't want to be not sharing information that's asked for.

Question:

Because the information that m and s hold is not gonna involve people's national insurance number, driver license number and passport number, whereas this is actually much more serious and has the real risk of identity fraud.

Answer:

I think what M&S and the co-op had financial card details, though, that's what theirs was felt to be so very, it had got people's account codes.

Question:

I was just curious 'cause people have asked questioned why they heard.

Question 2:

I think in our church, certainly some individuals feel that this personal data is far more serious than having your bank account details.

And I think I was a bit annoyed the fact that the emphasis early on was, oh, but at least your card details haven't been stolen.

Well, you can change your card details, you can inform your bank, but for your personal information that people could use to take out loans in your name and all sorts, that's far more serious I felt.

But I've been pleased there hasn't been a big press interest in this because I don't want people who to know that my data's out there on the dark web somewhere.

The fewer people who know it's there, the fewer people will go looking for it, I think is how I felt.

Answer:

Thank you Alison. and just to pick up on, on Nick's second question that's in the chat there about whether the scope for the need for DBS checks will be reviewed, and whether they're, they're needed for, for, for all PCCs or PC roles.

That is a matter that is a little bit out of our control, Nick, in, in the sense that, the, the DBS agency with whom we have, a working relationship, identifies the sorts of role and the sorts of circumstance and situation, that require DBS checks and the level of DBS check that's required for each of those roles and circumstance.

And so from our perspective, there's a compliance requirement, associated with DBS checks.

Alongside that, there is a, a need for DBS checks to ensure that as a church we're providing a safe, an environment as we possibly can for everyone.

And so there is, sort of both, a cultural aspect in terms of our, our appetite and desire to want everyone to feel that they are, they are safe in the church, but also, a more statutory aspect to when DBS checks are, are needed or not. and so, we can absolutely feed into both of those areas, but some aspects might unfortunately be out of our control, perhaps with good reason.

But it means that when we are looking at, our, our new suppliers, we, we do need to think about the proportionality of the information they're seeking, the retention periods for which they're keeping that, that information and ensuring that that's proportional as well, and that there's good practice in place in terms of the safeguards, around all of that information.

And with regard to your, your follow up question about the impact of refusals, it's absolutely front and centre of our mind. You know, we rely so much on, on volunteers, and what we would like to be able to do is to restore confidence, and, and hope to, you know, in despite the sort of the, the initial impact that we're seeing minimise, you know, volunteer participation in the future.

Conclusion

If there are no further questions, then I think probably, now is the moment to to, to bring our call to an end. thank you very, very much for participating in this conversation, for your openness and honesty and sharing all of your concerns.

This is an ongoing conversation, so this isn't the only opportunity to share your views. as I mentioned earlier, I do encourage you to continue to dialogue with us through the DBS inquiries and the communications email boxes. and, if we're able to, in the naughty distant future, particularly once our investigations as well have, have, you know, been taken a little further forward, then we will, consider, you know, putting another call in place so that we can, hear firsthand from you and, and share information directly with you.

That doesn't mean to say it'll go quiet now and we will continue to use our, our email channels as well, to keep you all appraised.

So thank you for your patience and thank you for, the views that you've expressed, which we do take seriously and many of which we share ourselves, and do rest assured that the information you've shared will go back to the senior leadership team to Bishop Steven, and to the diocesan secretary and our senior clergy as well, and we will factor all of that into, how we take things forward.

Timescales

Timescales are quite difficult to pin down, you know, the, the information, I'm sorry, the, the investigation that APCS are undertaking, is one that's being managed, by their data protection specialist, which we haven't been given a timescale for despite asking repeatedly. But in the meantime, we are conscious that we can't put on pause our DBS activities indefinitely.

So there will come a point in which we will need to take a reasonable decision as to, you know, what measures we can put in place in the interim period, or if indeed we need to, to, to take a very different direction of travel.

So we're absolutely alive to the fact that, that, that timeliness is, is significant in, in all of this. and we'll continue to communicate with, with you on that as well.

So, thank you all very much for your time, and, and for, for your patience today.