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## **ANN PHYSIOCARE LIMITED**

**Registered Head Office:**  
37a Clase Road, Morriston, SWANSEA SA6 8DS.  
Tel: 0330 124 2392 Email: [rehab@annphysiocare.com](mailto:rehab@annphysiocare.com)

**Website:** [www.annphysiocare.com](http://www.annphysiocare.com)

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<b>Document Name</b>	<b>APC Incident Reporting and Complaints Policy</b>
Version	V.3
Approved by	Mani Neelamegan
Approval Date	22 June 2021
Last Reviewed on	01 August 2025

### **Introduction**

1. The aim of this policy is to address any issues raised by either our clients or employees to comply with relevant legislation regarding the keeping of employment records and customer data. Ann Physiocare Limited (APC) requires personal information relating to everyone in order to manage its business in an efficient and effective manner; this data is subject to the Data Protection Act 1998.
2. APC commitments to, and delivery of, effective information governance. Incident reporting and management is the process investigating, resolving, and learning to minimise the risk of re-occurrence.
3. Our procedure for dealing with any incidents and complaints is for it to be reported the management team. This will then be investigated and resolved following the correct procedure.
4. The incidents will be identified as to what it relates to, and will be passed on to the correct individual/department to be dealt with.



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### **Roles and Responsibilities**

#### **Staff**

All staff and contractors are obligated to report any suspected data breach events to their supervisors and provide sufficient details to complete the incident reporting form. The incident reporting form should be handed to the incident response team for evaluation and resolution.

#### **Incident Response Team**

**The incident response team should be comprised of the following:**

**Management Team:** Management team would be required to review investigation of data breach events and determine escalation if needed. They are also responsible for making key decisions required to address data breach event and inform impacted data subjects.

**Client Account Managers:** Account Managers are responsible for reporting and communicating the incident details to the clients.

**Data Officer:** The data officer is responsible for validating data / information breach or loss and also communicating with ICO or any other external bodies.

**Chief Information Officer / CTO :** The Chief Information Officer or the CTO may be required if the data breach event is determined to be IT-related, and it is required to either resolve the breach or develop workarounds to mitigate identified impact.

**Senior Leadership Team /CEO:** Leadership team should be involved if the data breach event is determined to cause potential reputational loss and/or financial damages



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### Incident Response Overview



#### Event Capture:

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All data breach incidents begin as data breach events. Data breach events can be detected or captured in a variety of manual or automated ways, including through employees, law enforcement, third parties, and information technology. Each event should be immediately reported to the IRT using the incident response form.

### **Event Evaluation and Escalation:**

The IRT is responsible for evaluating the data breach event and determining whether the event represents a data breach incident. The IRT also assesses the nature, scope, severity, and priority of the incident and mobilizes internal and/or external resources to respond accordingly

### **Incident Containment and Recovery**

It is critically important to determine the source of the incident and to contain it. Delay in incident containment may result in more data subjects being impacted. Incidents with unknown sources may include network intrusions which might be detected by APC's Internet Service Provider, an Intrusion Detection or Intrusion Prevention System, and incidents brought to APC's attention by law enforcement. In these types of circumstances, investigation is likely needed to identify the avenue of attack, trace the incident cause back to its source, and determine the full impact of the incident. The nature of the investigation will depend on the likely source of the incident. The investigation may be strictly internal or it may involve cooperation with law enforcement or third party investigators. Some incidents are fixed and finite by nature and can be considered contained even though the amount of compromised information may not be known initially. Once an incident has been initially contained, the next step is to forensically collect and preserve any evidence necessary to properly investigate the incident. Forensic analysis of preserved materials is often needed to identify the avenue of attack and provide guidance to APC's available recourse options and next steps. Once the scope of an incident is fully known and all relevant evidence is preserved, recovery activities are implemented to return affected systems and functions to normal operations

### **Incident Closure & Risk Mitigation**

The final step of the incident response process is to close the incident, mitigate the risk of the incident re-occurring, and perform incident response plan and process maintenance.



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### **The closure process includes steps for:**

- Determining any legal action that may be necessary
- Conducting a lessons learned session
- Initiating remediation activities such as training and awareness, business processes changes, systems changes, and third party contract changes
- Updating the incident response plan and associated process
- Determining if any relationship repair activities are required with the data subject(s) impacted

### **Incident Reporting**

Incident reporting must be done all through the incident response process to keep all stakeholder informed about the incident and the response progress.

### **The final report must contain at least the following information.**

- Name and contact details of the person reporting the incident.
- Date of Incident
- Location of the incident.
- Description of the incident in the chronological sequences with date/time/location
- Number of personal data affected.
- Details of data lost if any
- Nature of information lost (if any)
- Financial, Reputational impact.

### **Information Security**

An information security incident is where there might be a breach of data security which might affect the confidentiality or availability of information stored. This covers any sensitive personal information that a reasonable person would consider it to be sensitive.

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APC guarantees the confidentiality of the breach and will attempt to resolve it with utmost urgency. Based on the guidelines provided by the Information Commissioner's Office (ICO) regarding a potential breach, it will be auctioned as per their guidelines, as follows (Guidance on data security breach management 20121212 Version: 2.1, ICO):

### **Breaches of security Legislation**

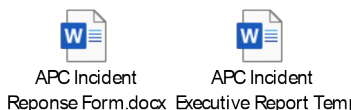
Any breaches, whether accidental or purpose, discovered by employee or client should be reported upon discovery. This will have to be reported to their line manager, who will in turn take appropriate action to contain and resolve the breach.

An employee should not attempt to prove a suspected security weakness as this might be interpreted as a potential misuse of the system. The weakness should be reported to their line manager, who will in turn follow the correct procedure.

### **Legislation**

We refer to the Information Commissioner's Office for guidance on how to deal with incident, breaches and management of data.

### **Incident Executive Reporting Form & Incident Response Form**



### **~ Policy Implementation Notice ~**

This is the policy statement of:

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### **ANN PHYSIOCARE LIMITED**

The overall and final responsibility for this policy is that of:

**DIRECTOR**

**Signed:**

**Dated**                      **22/06/2023**

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

**MANI NEELAMEGAN**

**Policy Review Date: 01/08/2025**

**Next Review Date: 01/08/2026**