[Company name]

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Data Breach Response Checklist

Work through the phases in order: detect, contain, assess, notify, recover, and review.

1. Incident record

Incident reference number	[Incident reference number]
Date and time the breach was discovered	[Date and time the breach was discovered]
Person who discovered the breach	[Full name of the person who discovered the breach]
How the breach was discovered	[Description of how the breach was discovered]
Incident lead	[Full name of the incident lead]
Date this checklist was opened	[Date this checklist was opened]

2. Response team

Role on the response team	Name of the person in this role	Contact details for this person
Incident lead	[Full name of the incident lead]	[Contact details for the incident lead]
Technical investigator	[Full name of the technical investigator]	[Contact details for the technical investigator]
Legal adviser	[Full name of the legal adviser]	[Contact details for the legal adviser]
Communications lead	[Full name of the communications lead]	[Contact details for the communications lead]
Senior manager notified	[Full name of the senior manager notified]	[Contact details for the senior manager notified]

Phase 1. Detect and report

☐	The suspected breach has been reported to the incident lead immediately, and the time of that report is recorded in section 1.
☐	No one has deleted, altered, or overwritten anything that might be evidence, including logs, emails, and affected devices.
☐	Access to affected systems has been noted but not casually changed until the technical investigator advises, so evidence is not lost.
☐	A single incident record has been opened, and all later notes, decisions, and messages are filed against it.

Phase 2. Contain

☐	Affected systems or accounts have been isolated or disabled as far as needed to stop further exposure, without destroying evidence.
☐	Compromised credentials have been revoked or reset, and any sessions still open under them have been ended.
☐	Network access used by the breach has been blocked where it has been identified, and the block is recorded with its date and time.
☐	Backups have been checked to confirm they are intact and have not been affected by the same breach.
☐	Short-term containment is recorded separately from any longer-term fix, so the incident record shows what stopped the harm and what fixed the cause.

Phase 3. Assess the scope and the data affected

☐	The systems, accounts, and data stores involved have been listed, including any that were only possibly involved.

	The types of personal data involved have been identified, and whether sensitive categories of personal data are included.
	The number of people affected has been estimated, with the basis for the estimate recorded, and marked as estimated until it is confirmed.
	The period during which data was exposed has been established as far as the evidence allows.
	Whether data was only viewed, or was also copied, altered, or deleted, has been recorded for each affected system.

Phase 4. Notify

	Senior management has been briefed with the confirmed facts, the unknowns, and the next decision needed.
	Legal advice has been taken on whether the applicable data protection regulator must be notified, and by what deadline.
	Where regulator notification is required, it has been made within the deadline, and the reference number is recorded here: [Reference number for the regulator notification].
	A decision on notifying affected people has been recorded, with the reasons, even where the decision is not to notify.
	Where affected people are notified, the notice states what happened, what data was involved, what has been done, and what they should do.
	Insurers and any affected outside providers have been notified where the policy or contract requires it.

Phase 5. Eradicate and recover

	The cause of the breach has been removed, including any unauthorised access route, malicious software, or misconfiguration that enabled it.
	Affected systems have been rebuilt or restored from clean backups, and the restored data has been checked before return to use.
	Passwords and access keys that may have been exposed have been changed, and affected users have been required to reset theirs.
	Additional monitoring has been put in place on affected systems for a defined period after recovery.
	Return to normal service has been approved by the incident lead, and the date and time of that approval are recorded.

Phase 6. Review and learn

	A post-incident review has been held with everyone on the response team, covering what worked, what failed, and what was unclear.
	The root cause, the timeline, and the effectiveness of each phase are written up in the final incident report.
	Every lesson from the review has an owner and a completion date, and open lessons are tracked until closed.
	This checklist, and any related plan it follows, has been updated to reflect what was learned.
	The completed incident record, including notification decisions and evidence, has been filed and retained under the organisation's retention rules.

Sign-off

[Summary of the outcome of this incident, including whether notification was made and whether recovery is complete.]

Incident lead name	[Full name of the incident lead]
Reviewer name	[Full name of the reviewer]
Incident lead signature	[Signature of the incident lead]

[Company name]

Reviewer signature	[Signature of the reviewer]
Date of sign-off	[Date of sign-off]