



## CIFO response to the Statement Issued by the Office of the Data Protection Authority (Guernsey) 11 March 2020

The Office of the Data Protection Authority (Guernsey) has today (11 March 2020) issued a formal Reprimand to the Channel Islands Financial Ombudsman (CIFO) for a single breach of The Data Protection (Bailiwick of Guernsey) Law, 2017. CIFO accepts this Reprimand and wholeheartedly regrets the unacceptable accidental sharing of a complainant's personal and private information with an unconnected third-party individual in the course of the investigation of a financial complaint. While CIFO's data processes are highly secure and independently certified to the same high standard as regulators and governments, this extremely unfortunate incident arose from human error. CIFO has reviewed and further strengthened its internal processes to seek to avoid this situation occurring again.

CIFO's statutory role is to resolve complaints about financial services provided from Guernsey and Jersey as an alternative to going to court. In 2018, CIFO received well over 400 enquiries and potential complaints and opened 239 new cases for investigation. 58% of complaints completed in 2018 were resolved in favour of complainants and the average amount of compensation awarded was £13,231. The service is free to complainants and is confidential: while we do publish case studies and Ombudsman decisions, these never give details of the complainants' identity.

CIFO takes the confidentiality of complainants' data extremely seriously and invests a lot of effort into keeping the important personal data we hold safe. Our staff are carefully vetted and from their first day have the importance of keeping personal data secure instilled in them. We invest in our IT systems to ensure our infrastructure is as secure as possible and currently hold the [Cyber Essentials Plus certification](#).

In the instance investigated by the Guernsey Data Protection Authority, the CIFO team member responsible for the particular complaint under review had

intended to send an email to the complainant, which contained personal financial and health data relevant to that complainant. The sender manually typed the email address and, by accidentally missing out one letter in the email address, caused the information to be sent in error to an unrelated individual.

While the personal data was only shared in error with one person, we fully appreciated the level of violation of privacy and have apologised unreservedly to the complainant. As soon as CIFO became aware of this error, we apologised to the complainant, contacted the recipient to advise them to delete the information, and self-reported the incident to the Guernsey Data Protection Authority. We made the entire CIFO team aware of the incident and further reminded them of the imperative to handle personal data with the highest level of confidentiality and security. We reviewed our procedures and have brought in new requirements so that email addresses are never typed by hand and that preliminary contact is always made to test the email address before using it to send any personal information. We followed up with a further detailed apology and explanation to the complainant and assisted the Data Protection Authority with its investigation. CIFO's Board of Directors was also briefed on the incident and our response.

Quote from Douglas Melville, Principal Ombudsman and Chief Executive:

“We accept the reprimand issued by the Guernsey Data Protection Authority and commit to doing a better job of protecting personal private information going forward. Public trust is critical to our ability to carry out this challenging role of providing a free, accessible service to resolve customer complaints about financial services providers and we are very sorry for making this error and for the upset that it has caused to the complainant involved.”