

## **Data Protection Act 1998 Undertaking follow-up**

### **Wokingham Borough Council ICO Reference: ENF0510309**

On 4<sup>th</sup> August the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Wokingham Borough Council in relation to the undertaking it signed on 9<sup>th</sup> April 2014.

The objective of the follow-up is to provide the ICO with a level of assurance that the agreed undertaking requirements have been appropriately implemented. We believe that appropriate implementation of the undertaking requirements will mitigate the identified risks and support compliance with the Data Protection Act 1998.

The follow-up assessment consisted of a desk based review of the documentary evidence Wokingham Borough Council supplied to demonstrate the action it had taken in respect of the undertaking requirements. This included the terms of reference for the Information Governance Group, their work plan, training completion reports, new training materials linked to revised policies and procedures, a 'new starters' process document showing that data protection and information security training is given before access to systems is granted.

The review demonstrated that

Wokingham Borough Council has taken appropriate steps and put plans in place to address some of the requirements of the undertaking, however some further work needs to be completed to fully address the agreed actions.

In particular Wokingham Borough Council confirmed that it has taken the following steps:

- Staff have completed data protection and information security related training.
- New staff are required to complete this training before access to IT systems is granted.
- Guidance on transporting paper documents has been created.
- An Information Governance Group meets to implement a data protection related work plan.
- The Council has committed to reviewing and refreshing their training material at regular intervals.

However Wokingham Borough Council should take the following further action:

- The undertaking requested that 'a refresher training structure' should be implemented. Wokingham Council have implemented an annual review of training materials. However, plans for providing staff training in data protection and information security at no more than two year intervals do not appear to be in place. Further action should be taken to ensure that this refresher training occurs in the future for all staff.

***The matters arising in this report are only those that came to our attention during the course of the follow up and are not necessarily a comprehensive statement of all the areas requiring improvement.***

***The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rests with the management of Wokingham Borough Council.***

***We take all reasonable care to ensure that our Undertaking follow up report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.***