

Data Protection Act 1998 Undertaking follow-up

London Borough of Barking and Dagenham ICO Reference: ENF0512354.

On 30 October 2014 the Information Commissioner's Office (ICO) concluded a follow-up assessment of the actions taken by London Borough of Barking and Dagenham in relation to the undertaking it signed on 22 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 evidence London Borough of Barking and Dagenham supplied to demonstrate the actions it had taken in respect of the undertaking requirements. This included a copy of the amended Information Security Breach Investigations policy, a copy of training materials used in targeted face to face data protection training and corporate training statistics detailing the completion rates of their mandatory information management training.

The review demonstrates that London Borough of Barking and Dagenham is taking appropriate steps and is putting plans in place to address the requirements of the undertaking, however planned work needs to be completed by London Borough of Barking and Dagenham to fully address the agreed actions.

In particular London Borough of Barking and Dagenham confirmed that it has taken the following steps:

- The council has reviewed and revised its policies and procedures for the handling of data breaches.

- The policy has now been amended to include specific and reasonable timeframes in which actions will be taken to retrieve personal data.
- The council has taken action to ensure that managers are made aware of the new policy and their requirement to disseminate it to their staff.

However London Borough of Barking and Dagenham has not yet fully complied with its commitment to implement other security measures as are appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction and /or damage. They have a recorded staff completion rate for their mandatory information management training of 86%; however the council is also aware that these statistics may be inaccurate, and should therefore take further action to:

- Ensure all staff complete London Borough of Barking and Dagenham's mandatory data protection training.
- Carry out a data cleansing exercise to ensure their staff training records are accurate and up to date.

Date Issued: 30 October 2014

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 London Borough of Barking and Dagenham.

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.