



5. In light of the above, and the remedial action that has been taken by the data controller, it is also agreed that in consideration of the Commissioner not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

**The data controller shall, as from the date of this Undertaking (save where otherwise provided below) and for so long as similar standards are required by the Act or other successor legislation, ensure that personal data are processed in accordance with the Seventh Data Protection Principle in Part I of Schedule 1 to the Act, and in particular that:**

- (1) The data controller shall draft and implement, by 31 January 2012, a formal policy covering the storage, transmission, use and disposal of personal data, to include IT security measures;**
- (2) Thereafter, all staff shall be made aware of the data controller's policy for the storage and use of personal data and appropriately trained how to follow that policy by no later than 29 February 2012;**
- (3) Compliance with the data controller's policies on data protection and IT security issues shall be appropriately and regularly monitored;**
- (4) Spreadsheets or other documents containing sensitive personal data relating to students shall only be provided to staff on a 'need to know' basis and shall not, in any event, be transmitted by email unless encrypted;**
- (5) All portable devices and removable media used for processing personal data, the loss of which could cause damage or distress to the data subjects, shall be encrypted using software meeting the current standards or equivalent;**
- (6) The data controller shall implement such other security measures as it deems appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction, and/or damage;**

Dated

Signed .....  
David Adelman  
Principal  
Godalming College

Signed .....  
Sally-Anne Poole  
Acting Head of Enforcement  
For and on behalf of the  
Information Commissioner