



Principle. This Principle is set out in Schedule 1 Part I to the Act. The Commissioner has also considered the fact that some of the data compromised in this incident consisted of information as to the commission of offences. Personal data containing such information is defined as "sensitive personal data" under section 2(g) of the Act.

6. Following consideration of the remedial action that has been taken by the data controller, it is 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 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. All FOI responses are double checked, preferably by a manager, to ensure that no personal data is included;
2. A specific written FOI procedure is implemented within the Information Compliance Unit. This should include the requirement to use a set checking procedure and to log all actions;
3. FOI responses are converted to a PDF format wherever possible;
4. Staff are aware of the data controller's policy for the retention, storage and use of personal data and are appropriately trained how to follow that policy;
5. The data controller shall implement such other security measures as are appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction, and/or damage.

Dated.....

Signed.....

David Crompton  
Chief Constable  
South Yorkshire Police

Signed.....

Stephen Eckersley  
Head of Enforcement  
For and on behalf of the Information Commissioner