

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

### **Foyle Women's Aid ICO Reference: ENF0452276**

On 19 November 2013 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Foyle Women's Aid in relation to the Undertaking it signed on 5 August 2013.

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 Foyle Women's Aid supplied to demonstrate the action it had taken in respect of the Undertaking requirements. This included data protection and confidentiality policies and procedures, as well as extracts from the staff training calendar and security procedures relating to the transport of manual data.

The review demonstrated that Foyle Women's Aid has taken appropriate steps and put plans in place to address some of the requirements of the Undertaking, however further work needs to be completed by them to fully address the agreed actions.

In particular they confirmed that they have taken the following steps:

- A Data Protection Policy is now in place and additions have been made to the existing Confidentiality and Retention of Documentation Policies. Lockable boxes have been introduced for the transportation of paper data outside the office, and an associated procedure for the use of these has been drafted.
- Line Managers are undertaking physical security spot checks to ensure compliance with clear desk procedures.

- Software has been installed on recently-purchased mobile devices which allows managers to technically restrict staff access to files.
- The file storage room has been fitted with a lock and physical access to offices is to be restricted to only those staff who require it. CCTV cameras have been installed around some premises.
- A shredding company has been employed to ensure that all paper records are disposed of securely.
- Confidentiality training has been provided for reception staff to help ensure that personal information is not inappropriately disclosed.

However Foyle Women's Aid should take further action:

- Data Protection training is in the process of being provided to all staff. This should be completed by the end of November 2013 as planned.
- Encryption software should be installed on all laptops, I-pads and any other mobile devices used by staff.
- Procedural guidance should be introduced for staff to follow in relation to the secure use of mobile devices, as planned.
- The access restriction software training which is currently scheduled for 2014 should be completed by all relevant staff prior to its implementation.
- The contract with the external shredding company should contain appropriate security clauses and checks on the company's security procedures should be conducted annually.

Date Issued: 19 November 2013

***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 Foyle Women's Aid.***

***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***

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