

Data Protection Act 1998 Undertaking follow-up

Health and Care Professions Council Case reference number: ENF0422217

On the 22 October 2013 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by the Health and Care Professions Council (the 'Council') in relation to the undertaking it signed in July 2013.

The objective of the follow-up is to assure the ICO that the requirements of the undertaking have or are being implemented in order to mitigate the identified risks and support compliance with the Data Protection Act 1998 (DPA).

The follow-up assessment comprises a desk-based review of documentary evidence supplied by the Council in support of the progress made in implementing the undertaking. This includes a management summary of actions taken or planned, policies, contracts, training and awareness materials and minutes of meetings.

The assessment concludes that the Council has or is taking appropriate steps to address the requirements of the undertaking. In particular, the Council confirms that it has taken the following steps:

- The processing of personal data by the Council's supplier is carried out under a signed contract, which sets out the minimum technical and organisational security measures to be maintained by the supplier.
- Needs based data protection, information management and information security training is being deployed for all employees, which will be periodically updated to reinforce awareness. In addition, information security awareness has been delivered to panel members via a face-to-face training session and monthly newsletter, and the Council's on-line learning packages are being adapted for their use.

- Additional resources have been deployed to ensure the regular monitoring and reporting of compliance with the policies and procedures relating to data protection and information security, both within the Council and across its supply chain. In addition, employees and contractors are required to sign a form confirming that they have read and understood the Council's policies and procedures before access to the Council's systems and data is granted.
- A review of data security and information management has been undertaken to identify risks and devise an improvement plan, which has been reported to the Executive Management Team (EMT) for approval. Actions taken so far include the approval of a Data Breach Notification Policy and the implementation of secure printing. Documentary evidence also shows that the Council is working to achieve certification to the information security management standard ISO/IEC 27001.

Date Issued: 23 October 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 rest with the management of the Health and Care Professions 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.