

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

**Mansfield District Council  
ICO Reference: ENF0453591**

On 3 May 2013, the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Mansfield District Council (MDC) in relation to the undertaking it signed on 17 January 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 MDC supplied to demonstrate the action it had taken in respect of the undertaking requirements. This included a management summary of actions taken, copies of policies and procedures, meeting minutes, training materials and other relevant documentation.

The review demonstrated that MDC has taken appropriate steps and put plans in place to address the requirements of the undertaking and mitigate the risks highlighted.

In particular MDC confirmed that it has taken the following steps:

- All data processing staff, including agency and external shared service staff with access to MDC data, have been provided with MDC's data protection e-learning training. All internal MDC staff completed the training within the time limits required within the undertaking. The data protection e-learning now forms part of the induction process.
- MDC's policies and internal procedures for storage and use of personal data were discussed with staff at team meetings in early 2013. A further e-learning training module specifically relating to the protective marking policy, retention and disposal and IT policies has been approved and is scheduled to be rolled out as mandatory follow up training for all staff. Work is ongoing to include this additional training module on the Mansfield Electronic Learning system (MEL).
- MDC retains training completion records centrally within MEL for all staff who have completed the data protection e-learning training. Records will also be held for staff who have completed the follow up module referred to above, when it is implemented.

- MDC has also taken additional security measures as appropriate, such as encrypting laptops and undertaking and agreeing an implementation plan as a result of an internal information security audit in January 2013. Refresher training has also been set up on MEL.

Date Issued: 27 June 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 MDC.***

***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.***