

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

**Oxfordshire County Council  
ICO Reference: ENF0506635**

On 18 November 2014 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Oxfordshire County Council (OCC) in relation to the undertaking it signed on 23 June 2014.

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 OCC supplied to demonstrate the action it had taken in respect of the undertaking requirements. This comprised of:

- Data Protection Manual. This was approved in August 2014, has a review date of August 2016, with responsibility for the policy assigned to the Monitoring Officer and the Data Control Officer.
- Remote Working Policy v2.2. This was approved in July 2014, has a review date of July 2015, with responsibility for the policy assigned to the Service Manager, ICT Business Delivery.

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

OCC confirmed that it has taken the following steps:

- The Council have put in place a revised remote working policy that includes guidance on the security of paper documents for staff working from home on an ad hoc basis. Updates to the

policy have been reviewed and signed off by the Information Governance Group (IGG) and the policy published to the Council intranet and communicated to directorate IGG leads.

- The remote working policy has been updated to include guidance on the availability of secure lockable cases for the transportation of documents, and this has been communicated to staff.
- The data protection manual has been updated to include a section on paper records. This states procedures must be in place to ensure paper files, transferred internally or externally, are only delivered to the person they are addressed to.
- A spot check in Legal Services confirmed that 100% of staff have completed mandatory induction data protection training.
- Data breach reports have been changed in both format and information gathered and will now be reviewed monthly rather than quarterly.

However, OCC should continue to take further action as follows:

- Implement changes to the Council's HR system in order for them to be able to monitor staff completion of data protection training courses.
- Ensure managers continue to communicate to all staff the changes in both the Data Protection Manual and the Home Working Policy, until they are embedded across the Council.

Date issued: 20 November 2014

***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 Oxfordshire County 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.***