

Introduction

The ICO was invited to conduct a data protection audit by the Council. The audit took place in spring 2014. The audit covered three main areas:

- Records management (manual and electronic)
 - The process in place for managing both manual and electronic records containing personal data.
- Training and awareness
 - The provision and monitoring of staff data protection training.
- Subject Access Requests
 - The procedures in operation for recognising and responding to individuals' requests for access to their personal data.

Findings

The ICO audit made 49 recommendations to the Council, and gave a rating of "Limited Assurance" for Records Management and Training and Awareness and a rating of "Reasonable Assurance" for Subject Access Requests. This translates into an overall rating of Limited Assurance.

Final audit report

In January 2015, the ICO supplied the final report. The Auditors were pleased to note significant progress in all 3 scope areas, stating that the Council has responded to these recommendations positively with 28 of the 49 recommendations accepted as complete, and a further 20 as partially complete.

Areas where improvements are particularly noteworthy include:

- The resolution of the nature and ownership of the substantial volume of records in the Civic Centre basement;
- The assignment of corporate responsibility for data protection training to the Information Governance Manager;
- The monthly consideration of subject access reports by the Information Governance Manager.

The ICO recommended that the Council continues to work towards full implementation of their recommendations. In particular

- The appointment of a corporate Records Manager to take the lead for records management
- The delivery of specialised training for specialised roles
 - This is being provided in June 2015 by the National Archives.

Current status

Of the 49 actions, currently 15 need to be completed.

To Start	0	0%
Underway	13	27%
Almost Complete	2	4%
Complete	34	69%

