

APPENDIX 2

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Subject: [PROTECT] ICO follow up audit - Confirmation of completion

PROTECT

Hi Peter

Thank you for completing and returning your updated action plan following our original audit in April 2013.

As you are aware, we have changed our follow up process, meaning this follow up consists of a review of your action plan and our acknowledgement, highlighting any priority recommendations which we believe are yet to be fully addressed. We will not produce a new report or executive summary and obviously there is no new rating. There will be a note added to our website simply to state that a follow up review has been completed.

Having reviewed your completed action plan, we are pleased to see that you are making significant progress on our recommendations. Of the 37 Accepted / Partially Accepted recommendations reviewed I agree that 22 are sufficiently supported by evidence to be designated as complete; 10 require more work and are currently in progress and 5 have yet to reach their implementation date, although work is ongoing.

The overall approach to implementing our recommendations was appropriate, with responsibilities allocated to specific members of staff. The overall process has a designated lead in the Democracy and Governance Manager and progress was overseen by the Data Protection team and reviewed by the Council's Internal Audit team.

Of particular note was the work undertaken in ensuring there are regularly reviewed performance indicators to ensure all officers in mandatory posts have received DP training by June 2014. Staff who regularly process sensitive personal information will receive refresher sessions within a maximum period of 18 months. Additional monitoring will be introduced with the roll-out of the i-Trent HR database, which will provide a corporate overview of DP

training. The appointment and training of a SIRO, together with additional training for the Records Manager and Information Governance Manager, will help to embed Information Governance at the Council.

I note it has been confirmed the majority of outstanding actions, where the target date for implementation has been deferred, will be completed by mid-2014. Further development of the Information Asset Register is now aligned to the roll out of the Corporate EDM System, with a completion date of December 2015, as is the work to ensure all electronic records, including those in Care.com, can be archived or deleted in line with the Council's retention schedules.

This is the final stage of the audit process. I hope that the Council has found the experience to be both positive and useful. Thank you again for the work you did to complete the action plan.

Regards

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