

Data Protection Act 1998 Undertaking follow-up

Aspers (Milton Keynes) Limited Case reference number: ENF0513929

On the 25 November 2014 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Aspers (Milton Keynes) Limited ('Aspers MK') in relation to the undertaking it signed on the 11 June 2014.

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 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 business in support of the progress made in implementing the undertaking. This includes a management summary of actions taken or planned.

The assessment concludes that Aspers MK has or is taking appropriate steps to address the requirements of the undertaking. In particular, the business confirms the following:

- A Data Protection Policy has been drafted and will be approved and communicated to all staff in November 2014.
- An IT Policy, which covers the acceptable use of email, is disseminated to all staff regularly (and as recently as November 2014), and elements of the policy will be addressed by on-line data protection training.
- On-line data protection training has been developed and approved and will be delivered to all staff on an annual basis.
- An information security risk assessment has been carried out of information systems and processes, and mitigating actions have been

identified and documented together with owners. This includes technical and organisational measures to minimise the risk of inappropriate disclosures of personal data by email.

- In addition, the business intends to implement regular audits of the Data Protection Policy together with security testing of information systems and services. It is good practice to implement independent reviews to ensure staff understand and comply with policy as well as technical compliance reviews to assure the effectiveness of information security measures.

Date Issued: 26 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 rest with the management of Aspers (Milton Keynes) Limited. 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.