



Information Commissioner's Office

Upholding information rights

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Data Protection Act 1998 Undertaking follow-up

The Royal Veterinary College ICO Reference: ENF0478455

On 23 October 2014 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by The Royal Veterinary College (RVC) in relation to the undertaking it signed on 9 October 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 DPA).

The follow-up assessment consisted of a desk based review of the documentary evidence The RVC supplied to demonstrate the action it had taken in respect of the undertaking requirements. This included:

- Email reports to managers detailing all staff who had not completed the mandatory Data Protection course within the time allotted.
- A sample of email reminders to staff who have not completed this training and their Heads of Department.
- Induction guidelines detailing the requirement for all new employees to complete the Data Protection Essentials Course prior to completion of their probation period.

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

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

- A data protection training provider was sourced and all existing staff were instructed to complete the online data protection training course as soon as possible and, at the latest, by the end of June 2014.
- A process for monitoring completion of this training and 'chasing' staff who have failed to complete this mandatory requirement has been established which includes escalation to Heads of Department on a periodic basis. Going forward, this process has been extended to ensure that staff who have still to

complete this training, or have attempted and failed to achieve an appropriate pass mark on a number of occasions are required to attend a follow up meeting with HR.

- Monthly reporting to RVC's Chief Executive Officer on data protection training statistics during a monthly meeting with the College's HR Director has been established.
- The staff induction process has been updated to include mandatory data protection training. New employees cannot be confirmed in post until this training has been completed.
- A number of new laptops which have been encrypted using appropriate drive encryption have been purchased. These laptops are only available to staff with a valid business reason for storing or transmitting personal data using a mobile device.
- An Information Handling Policy has been produced and forms part of a revised suite of information security and IT usage policies which is due to be approved by the Information Security Group in November 2014.
- Door control systems have been established in all buildings and access control is centrally managed and recorded with security personnel. Further to this all staff have been reminded via the data protection training to secure personal data by locking offices, computers and filing cabinets.
- RVC's internal auditors have examined the access control and other measures in place to ensure the security of personal data.

However RVC should continue to take further action as follows:

- Whilst accounting for maternity and sick leave there are 10 members of staff who have not completed the data protection training. This gap in knowledge should be addressed as a priority.
- Training material should be reviewed and updated periodically so that it is up to date with changes in legislation, ICO guidance and organisational policy.
- Refresher training should be provided at appropriate intervals to remind staff of their data protection responsibilities.

Date Issued: 28 October 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 The Royal Veterinary College.

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,

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