

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

### **Parole Board for England and Wales ICO Reference: ENF0513664**

On 20 July 2015 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by the Parole Board for England and Wales (the Parole Board) in relation to the undertaking it signed on 09 March 2015.

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 that the Parole Board supplied to demonstrate the action it had taken in respect of the undertaking requirements. This included relevant sections of the revised Members' Handbook.

The review demonstrated that the Parole Board has taken appropriate steps and put plans in place to address some of the requirements of the undertaking, however further work needs to be completed to fully address the agreed actions.

In particular the Parole Board confirmed that it has taken the following steps:

- The Information Assurance guidance for Members working remotely has been revised and updated in the Members' Handbook. The Handbook outlines the security standards that are required to be in place when Members are homeworking and gives the Parole Board the option of conducting inspections, if they feel it necessary.

- The updated Handbook requires that Members are able to account for all dossiers in their possession and a template document has been developed to allow Members to track dossiers.
- The updated Handbook advises Members to return dossiers, once they are no longer required, to the Parole Board for controlled destruction. Arrangements are in place with an approved courier company to collect any dossiers from Members and to transport them to the Parole Board for destruction. Alternatively, where hearings take place within prisons, Members are able, with the agreement of prison staff, to arrange for dossiers to be disposed of at the prison. Any such agreement needs to be fully recorded.
- Members are required to sign an Information Assurance Declaration, on an annual basis, to confirm that they are familiar with the Parole Boards' Data Protection, Information Security and Information Assurance policies and the associated guidance. Records of completion are maintained on the Parole Board's casework database to allow outstanding declarations to be followed up.
- The Parole Board have taken steps to increase staff awareness of Information Assurance; these steps have included a stand at the Members' annual conference which was manned by a member of staff who was available to answer questions on information assurance matters. Similar regional events have also included reminders about the importance of Information Assurance and highlighted the recent changes to the Members' Handbook.
- A new pack of presentation slides, aimed at new Members, has been developed for inclusion in the recruitment pack for the next intake of new Members.
- The Parole Board's IT department is in the process of developing a Web Access Module for their casework database; this will allow Members to access case dossiers remotely and thereby remove the necessity for hardcopy dossiers and reduce the risk of documents being lost in transit.

However the Parole Board should take further action:

- The initial Information Assurance Declarations, referred to above, were sent out to Members, for completion, in June 2015. These were then followed up in July 2015 and work is ongoing to follow up on outstanding returns. The Parole Board should ensure that all declarations are received and that the importance of returning future declarations in a timely manner is reinforced.

- Members are currently unable to access the Civil Service Learning website, which would allow them to access the same Information Assurance learning modules as other Civil Service staff. The Parole Board should continue with their efforts to identify a technical solution to this problem or implement training by alternative means.

Date Issued: 24 July 2015

***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 Parole Board for England and Wales.***

***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.***