

Data Protection Act 1998 Undertaking follow-up

Brunel University London
ICO Reference: COM0570001

On 7 April 2016 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Brunel University London in relation to the undertaking it signed on 28 July 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 (DPA).

The follow-up assessment consisted of a desk based review of the documentary evidence Brunel University London supplied to demonstrate the action it had taken in respect of the undertaking requirements. This included: the induction booklet for staff, evidence of data protection information on the induction pages on the staff intranet, the 6 and 12 month probation forms for non-academic staff, a data protection presentation delivered to the Executive Board, evidence of the data protection components of the staff development programme, a schedule of data protection briefing dates and refresher sessions, an eLearning module on data protection, the interim information classification guidelines document and the Cyber & Information Security action plan and roadmap.

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

Brunel University London confirmed that it has taken the following steps:

- The completion of data protection training has been embedded as a requirement for successful completion of probation for non-academic staff at 6 and 12 months.
- Data protection training is now available to staff in the form of an eLearning module accessed via the University's intranet.
- Senior staff, including members of the Executive Board, have received a briefing from the Information Access Officer on the DPA and the importance of compliance when processing personal data.
- A number of face-to-face briefings and refresher sessions on data protection have been scheduled for staff over the next 6 months.

- There is now a set of criteria in place to provide guidance for staff regarding when they should next undertake data protection training and in which format.
- A data classification scheme for information held and generated by the University has been drafted and should be implemented before the end of 2016.
- The University is in the process of reviewing its overall approach to cyber and information security. The action plan includes development of an updated training and awareness programme.

However Brunel University London should:

- Ensure the data protection training programme is rolled out to appropriate academic staff as soon as is feasible.
- Ensure that completion of refresher training once a staff member has passed probation is robustly monitored.

Date issued: 8 April 2016

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 Brunel University London. 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.