

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

### **Hillingdon Hospitals NHS Foundation Trust Case reference number: ENF0455232**

In January 2014 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by the Hillingdon Hospitals NHS Foundation Trust (the 'Trust') in relation to the undertaking it signed in September 2013.

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

The assessment concludes that the Trust has or is taking appropriate steps to address the requirements of the undertaking. In particular:

- There is a documented process to ensure information governance incidents are promptly reported via appropriate management channels, which is available on the intranet.
- The incident reporting process is covered within local induction and annual information governance training materials, and training uptake is monitored to help assure the successful delivery of training. In addition, articles have been published in the staff magazine reminding personnel of what, how and to whom incidents should be reported.
- Measures have been implemented to improve the security of patient information in transit between sites and minimise the risk of data loss. This includes the use of sealed packages to transport documents, and

the maintenance of audit trails to track the collection and delivery of documents.

Date Issued: 15 January 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 the Hillingdon Hospitals NHS Foundation Trust. 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.***