Audit No	Action	ICO Priority	Current Status	Start Date	Completion date	Update	Current RAG
a1	The SIRO's responsibility for strategic direction and oversight for Records Management should be formally documented	1	Completed	01/05/15	31/07/15		Complete
a10	Ensure that staff working with high risk, sensitive personal data receive data protection training (including records management) at induction and that this is refreshed on an annual basis.	1	Completed	01/08/16	30/11/16	Ad hoc bespoke training is delivered to Social Workers when required by the Data protection lead	Complete
a14	Ensure work of the Corporate Fraud Team is reported into the IASG on a regular basis (this is regarding the informing of individuals).	1	Completed	01/05/15	31/05/15		Complete
a16	Provide training to information asset owners to enable them to fulfil their role.	1	Completed	22/03/16	28/04/16		Complete
a18	Identify the various third party data storage arrangements and associated contracts. Ensure contracts are fit for purpose and include relevant data protection and information security clauses such as the right to periodically visit their premises. Retain central oversight of these contracts with assurances reported to the IASG periodically	1	Completed	17/03/16	31/03/17	Third party contracts for paper storage have been identified and a consolodated contract has been agreed with Iron Mountain. This contract includes relevant data protection and information security clauses. KPI's will be reported to the IASG regarding performance and	Complete
a19	Implement storage arrangements and retrieval and tracking mechanisms observed at Salisbury warehouse within other warehouses holding records. See additional requirement below to strengthen this.	1	Completed	01/12/14	30/09/15		Complete
a2	Operational responsibility for records management across the council should be assigned to a corporate records manager. The main responsibility of the records manager should be enabling and ensuring implementation of records management policy and procedure.	1	Completed	01/09/16	30/09/16	A Records Manager was appointed and took up position with effect from September 2016	Complete
a20	Test tapes holding back-ups periodically to ensure data can be recovered if required.	1	Completed	01/03/16	01/08/16		Complete
a21	Create service area disaster recovery plans as soon as possible. Ensure they explain how client records and systems holding client records are to be reconstituted following a disaster. These plans should be subject to periodic testing	1	Completed	01/07/15	01/11/15		Complete
a26	Ensure that passes are signed out to individuals rather than staff members (include in policy) Please see additional requirement regarding physical security below.	1	Completed	20/04/16	31/07/16	A global communcation has been issued to all staff to reinforce the process of visitor passes that must be signed out to to individuals rather than staff members. A policy has been created to support this process also.	Complete
a28	Whilst records at the Trowbridge warehouse are currently stored in a way which does not promote findability, ensure that staff searching for records are accompanied by another member of staff with sufficient seniority to enforce security rules if required e.g. a facilities manager. `	1	Completed	01/12/14	30/09/15		Complete
a3	Assign local records management responsibilities and include these within the records management policy. This could be done by incorporating such responsibilities within the remit of the planned Information Asset Owners. The SIRO should receive assurances from the service areas in regard to implementation of the Records Management policy.	1	Completed	01/10/15	31/12/15		Complete
a32	Review the requirement for Children's Services staff to access all records and apply restrictions if necessary. Client records should not be accessed by staff unless there is a business requirement for them to do so.	1	Completed	01/07/16	01/04/17	Since the ICO audit we have written and implemented a Restricted access policy which allows for restricted access to be managed for more sensitive records. We have started the procurement of new case management systems and we will be looking to improve role based security with the implementation of new systems with more refined access abilities. System roll out is planned through to 2020.	Complete
a33	Create an off-site/remote working policy which sets out the expectations on staff when handling personal information when outside of the office.	1	Completed	01/10/15	31/12/15		Complete

a6	Once new responsibilities and approach to records management has been determined, update the records management policy. It should be ratified at senior level e.g. at the IASG to verify that it is fit for purpose. Ensure that the document is reviewed periodically and has been assigned an owner.	1	Completed	01/10/15	31/12/15		Complete
a9	Provide specialist training for IAOs and consider whether other staff should be provided with records management related training. Adequate training should be provided for the role responsible for Records Management going forward.	1	Completed	01/09/16	31/12/16		Complete
b1	Implement a dedicated SARs Policy defining how the Council handles and oversees the handling of SARs. The SARs Policy once implemented, should then be subject to regular review.	2	Completed	01/10/15	31/12/15		Complete
b12	Roll out a dedicated SARs training course to staff handling SARs within Services.	2	Completed	01/10/16	31/12/16		Complete
b13	Identify & implement data protection departmental representatives for departments where personal data is processed. This may ease the volume of queries directed to the Principal Information Officer.	2	Completed	01/09/16	01/07/17		Complete
b16	Where unavoidable delays occur, requesters should always be updated and provided with a revised timescale for the final response, to provide clarity on the process and manage requester expectations regarding a response date.	2	Completed	01/09/16	30/11/16		Complete
b18	Ensure that procedures are in place to check that requests are dealt with in a timely manner and that late responses are reported to a suitably senior person(s) to track and feed into any required improvement plans	2	Completed	01/01/16	01/07/16		Complete
b29	Document formal procedures to offer onsite viewing facilities to requesters where appropriate.	2	Closed	01/05/15	01/09/16		Complete
b36	Review how SARs related complaints information is recorded and how this could be extracted in the form of a management report or equivalent	2	Completed	01/05/16	17/06/16	The Delta system provides this	Complete
c10	The Council should introduce the proposed tick box within Carefirst records to record provision of fair processing information to clients, as planned.	2	Completed	01/07/16	31/12/16	Response from Lynda Cox, Caldicott Guardian 06.10.2016: Fair Processing is recorded in the pack that goes to families when services first contact them.	Complete
c14	Fair processing proposals for the Wiltshire Single View project should be discussed and agreed as appropriate, and should be in line with the relevant legal framework.	2	Completed	01/05/15	01/05/16		Complete
c16	The Wiltshire Single view PIA should be developed, discussed and agreed in line with project requirements, and the use of specialist IT staff included as proposed.	2	Completed	04/01/16	30/06/16		Complete
c19	Council to introduce a specific process for the assessment / authorisation of data sharing agreements, even where part of a contract.	2	Completed	01/05/15	01/09/16		Complete
c5	The 'Decision Making Process for Single View of Client (SVOC) Data Sharing DRAFT' and the proposed SVOC Governance Board Terms of Reference should be considered and approved by all parties, as appropriate and in line with the agreed process. Please see below for additional requirement relating to the Single View Documents	2	Completed	01/01/15	30/04/15	Documents require review but were created & approved in Nov 2015	Complete
c7	Training or awareness raising sessions should be provided in line with Council data sharing procedures, for staff who are routinely involved in data sharing activities.	2	Completed	27/06/16	30/09/17		Complete