

## RFI 1234892 – Extracts from emails relevant to ICO Follow-up audit information

### Information disclosed by H&F

- We got IT to search for any emails and email attachments that were sent between 08 March 2018 - 23 March 2018 and which contained “ICO Audit”.
- We reviewed the email search results and extracted information to do with the ICO’s follow-up audit report sent to H&F on 08 March 2018. The extracted information is included in this document below.
  - We’ve used ‘....’ to indicate where we’ve left out irrelevant information from emails.
  - We’ve used ‘=====’ to indicate where there are several emails within one email chain.
  - We’ve used ‘\_\_\_\_\_’ to indicate where one email chain ends and a new one starts.
  - We’ve used ‘[H&F Officer(s)]/[RBKC Officer(s)]’ to indicate where we’ve redacted junior officer’s personal data.
- We’ve redacted the names and contact details of junior officers (those below Head of Service level) as the FOIA s.40 (Personal Data) exemption applies to this information. Their names and contact details are their personal data. They wouldn’t expect us to make their personal data public in this situation. If we did make it public this would be unfair and would breach Principle 1 (Fair and Lawful) of the Data Protection Act 1998.
- We’ve also attached redacted copies of the ICO’s follow-up audit report and H&F’s remediation plan to our response to your RFI.

### Extracts from emails and email attachments:

---

**From:** [H&F Officer(s)]

**Sent:** 08 March 2018 18:04

**To:** Shimidzu Ciara: H&F <Ciara.Shimidzu@lbhf.gov.uk>; Barella Veronica: H&F <Veronica.Barella@lbhf.gov.uk>

**Cc:** [H&F Officer(s)]

**Subject:** RE: SIRO engagement with IM

Notes from meeting

....

2. ICO Audit: Follow-up report received

**ACTION:** H&F have received the ICO audit report, [H&F Officer(s)] will circulate to key stakeholders and CS will then forward on to Chief Exec

....

---

**From:** [H&F Officer(s)]

**Sent:** 09 March 2018 11:31

**To:** Thomas Sarah: H&F <[Sarah.Thomas@lbhf.gov.uk](mailto:Sarah.Thomas@lbhf.gov.uk)>; Barella Veronica: H&F <[Veronica.Barella@lbhf.gov.uk](mailto:Veronica.Barella@lbhf.gov.uk)>

**Cc:** Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>; [H&F Officer(s)]

**Subject:** RE: FSS and Information Risk

... greater current scrutiny of H&F's Data Protection and Information Security practices by the Information Commissioner's Office (ICO) through:

- the recent ICO Follow-up review and report on H&F's progress with agreed ICO audit recommendations to improve H&F's data protection practices. Details published on [H&F's ICO Audit intranet page](#).

...

- H&F was due to participate in a follow-up review of progress on the ICO audit recommendations and it would not be appropriate for the ICO to take formal action before that process is complete.

---

On 9 Mar 2018 3:43 pm, [H&F Officer(s)] wrote:

Hi David and [H&F Officer(s)],

In case of help, I've attached the remediation plan that was sent to the ICO as part of the follow-up review process as this provides more detail on how H&F plans to 'catch-up' on those recommendations that are past the implementation dates.

=====

**From:** Hughes, David: CP: RBKC

**Sent:** 09 March 2018 10:07

**To:** [H&F Officer(s)]; Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>;

**Cc:** [H&F Officer(s)]

**Subject:** RE: ICO Audit for LB Hammersmith and Fulham - 9 month follow-up report

Thanks [H&F Officer(s)] and [H&F Officer(s)], [H&F Officer(s)] and I will take account of this review in forming the annual opinion.

=====

**From:** [H&F Officer(s)]

**Sent:** 09 March 2018 10:06

**To:** [H&F Officer(s)]; Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>; Hughes, David: CP: RBKC <[David.Hughes@rbkc.gov.uk](mailto:David.Hughes@rbkc.gov.uk)>  
**Cc:** [H&F Officer(s)]>  
**Subject:** RE: ICO Audit for LB Hammersmith and Fulham - 9 month follow-up report

...many thanks for your hard work and the team input into this. David will probably require some time to intelligently appraise the outcomes and findings of the ICO's follow-up report in his considerations as the Head of Internal Audit. I have copied David in as the review is an independent and external form of assurance.

=====

**From:** [H&F Officer(s)]  
**Sent:** 08 March 2018 19:28  
**To:** Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>; [H&F Officer(s)]  
**Subject:** FW: ICO Audit for LB Hammersmith and Fulham - 9 month follow-up report

**Ciara** – Copy of follow-up report and H&F's 9 month progress tracker have been uploaded to the H&F ICO Audit intranet page, under 'Audit Documents': [https://officesharedservice.sharepoint.com/sites/intranet/hf-corporateservices/informationmanagement/Pages/ICO\\_Audit.aspx](https://officesharedservice.sharepoint.com/sites/intranet/hf-corporateservices/informationmanagement/Pages/ICO_Audit.aspx)

=====

**From:** [H&F Officer(s)]  
**Sent:** 08 March 2018 19:02  
**To:** McNamara Dave: H&F <[David.Mcnamara@lbhf.gov.uk](mailto:David.Mcnamara@lbhf.gov.uk)>; Stuart Ann: H&F <[ann.stuart@lbhf.gov.uk](mailto:ann.stuart@lbhf.gov.uk)>; Barella Veronica: H&F <[Veronica.Barella@lbhf.gov.uk](mailto:Veronica.Barella@lbhf.gov.uk)>; [H&F Officer(s)]; Filus James: H&F <[James.Filus@lbhf.gov.uk](mailto:James.Filus@lbhf.gov.uk)>; Black Belinda: H&F <[Belinda.Black@lbhf.gov.uk](mailto:Belinda.Black@lbhf.gov.uk)>  
**Subject:** FW: ICO Audit for LB Hammersmith and Fulham - 9 month follow-up report

Dear All,

Please find attached a copy of the ICO's 9 month follow-up report.

The ICO recognise that H&F has made some progress but not as much as we had originally planned by this date. They acknowledge that we have a remediation plan in place (which ties in with the GDPR readiness project) and they advise H&F to continue our progress with the outstanding actions to the revised implementation dates.

Please all continue to progress the actions sitting with yourselves/your teams and provide me with an update on progress by the 12 month progress update (4<sup>th</sup> May).

I'll publish a copy of the Follow-up report on the H&F ICO Audit intranet page.

---

**From:** [H&F Officer(s)]  
**Sent:** 08 March 2018 21:01  
**To:** [H&F Officer(s)]  
**Cc:** [H&F Officer(s)]  
**Subject:** Re: FW: ICO Audit for LB Hammersmith and Fulham - 9 month follow-up report

... I won't be able to complete one thing which is the local SAR policy.

...

However, I can confirm that the indexing project was approved at SLT this week and I will also be presenting the paper at member briefing on 20th March so that hopefully we can get funding approved for the project.

---

**From:** [H&F Officer(s)]  
**Sent:** 09 March 2018 10:05  
**To:** Stuart Ann: H&F <[ann.stuart@lbhf.gov.uk](mailto:ann.stuart@lbhf.gov.uk)>; Barella Veronica: H&F <[Veronica.Barella@lbhf.gov.uk](mailto:Veronica.Barella@lbhf.gov.uk)>; Redfern Lisa: H&F <[Lisa.Redfern@lbhf.gov.uk](mailto:Lisa.Redfern@lbhf.gov.uk)>; Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>  
**Cc:** [H&F Officer(s)]; Information Management <[InformationManagement@lbhf.gov.uk](mailto:InformationManagement@lbhf.gov.uk)>; [H&F Officer(s)]; Whittingham Viv: H&F <[Viv.Whittingham@lbhf.gov.uk](mailto:Viv.Whittingham@lbhf.gov.uk)>; [H&F Officer(s)]  
**Subject:** RE: OFFICIAL-SENSITIVE: I453 - DP breach/IS Incident (Email disclosure to unauthorised individual): ICO Response[Ref. COM0718683]

...

The ICO will not be taking enforcement action against H&F, in relation to this breach, at this time.

- They refer to the fact that the ICO will complete a follow-up of H&F's progress on ICO Audit recommendations in March 2018.
- ...

The particular actions they recommend H&F implement are captured in the table below. I've assigned owners and included dates. Please keep IMT updated on progress with actions.:

Action Details	Implementation Date	Owner - Lead Officer	Owner - Dept	Owner - Service Area	Owner - IAO	Status Not Started (RED) In Progress (AMBER) Complete (GREEN)	Notes
LBHF should continue to engage with the ICO in relation to its upcoming follow-up audit.	Mar-18	[H&F Officer(s)]	FCS	Information & Strategy - Information Management Team	Veronica Barella (SIRO)	Complete	<b>All</b> - I spoke to the lead auditor earlier this week and the ICO issued the ICO audit follow-up report yesterday so this item is closed. H&F will need to continue with implementing the outstanding recommendations from the ICO audit report. Details of the ICO audit and copies of the relevant documents are on the <a href="#">intranet ICO Audit page</a> .

...

**From:** [H&F Officer(s)]

**Sent:** 09 March 2018 10:23

**To:** McNamara Dave: H&F <[David.Mcnamara@lbhf.gov.uk](mailto:David.Mcnamara@lbhf.gov.uk)>; Miley Steve: H&F <[Steve.Miley@lbhf.gov.uk](mailto:Steve.Miley@lbhf.gov.uk)>; Barella Veronica: H&F <[Veronica.Barella@lbhf.gov.uk](mailto:Veronica.Barella@lbhf.gov.uk)>; Shimidzu Ciara: H&F <[Ciara.Shimidzu@lbhf.gov.uk](mailto:Ciara.Shimidzu@lbhf.gov.uk)>

**Cc:** Maarouf Redouan: H&F <[Redouan.Maarouf@lbhf.gov.uk](mailto:Redouan.Maarouf@lbhf.gov.uk)>; [H&F Officer(s)]

**Subject:** OFFICIAL-SENSITIVE: I462 - Data protection Breach (Miss-sent information): ICO Response [Ref. COM0702339]

[Relevant email content as per email above: 'RE: OFFICIAL-SENSITIVE: I453 - DP breach/IS Incident (Email disclosure to unauthorised individual): ICO Response[Ref. COM0718683]]

---

**Attachment to email**

**From:** Shimidzu Ciara: H&F

**Sent:** 20 March 2018 09:00

**To:** [H&F Officer(s)]

**Subject:** GDPR and schools

**Attachment:** 180313 Feb-18 Highlight Report – SLT Appendix No2 v2

Extract from Attachment:

...

## **Dependencies**

### ***ICO Audit***

The ICO have accepted H&F's remediation plan to address the delays in the agreed ICO Audit action plan. The remediation plan agreed with the SIRO, Caldicott Guardians and Chief Executive was to ensure H&F completed all the deliverables for the GDPR Readiness Project on time as most of the audit actions replicated those on the GDPR Readiness Project Plan. However, they are still expecting H&F to complete those that do not fall within this project, for example ChS to correct errors with historical indexing for offsite archived Looked After Children (LAC) files.

...

---