

WAVERLEY BOROUGH COUNCIL

AUDIT COMMITTEE

20 NOVEMBER 2017

Title:

PROGRESS ON THE IMPLEMENTATION OF INTERNAL AUDIT RECOMMENDATIONS

[Wards Affected: ALL]

Summary and purpose:

To inform the Audit Committee of Senior Management's progress in implementing the recommendations raised by Internal Audit following a review in their service areas. This report will enable the Committee to consider what action is required in respect of those that are overdue or appear likely to be implemented later than the target date.

How this report relates to the Council's Corporate Priorities:

Internal Audit work contributes to the safeguarding of assets against loss and waste and for identifying other value or money issues.

Financial Implications:

Internal audit work helps management in achieving good value for money and, individual recommendations may have value for money implications.

Legal Implications:

There are no direct legal implications, although good governance is strengthened by attention to the matters raised in audit recommendations.

Introduction

1. This report provides the Audit Committee with the latest position regarding the implementation of Internal Audit recommendations.

Annexe 1 provides the current position on recommendations due for completion at the end of the month of the Audit Committee date.

2. At the previous Audit Committee meeting, members noted the request for a time extension for three recommendations relating to data protection and information security governance. Members noted that a new Information governance Board had been created which is overseeing the detailed work of the Information Governance Group which comprises officer representation from all services of the Council. The Strategic Director for Finance and Resources advised members that a recommendation would be put to the Executive in October for additional funds to support the procurement of external specialist support to support the Council's

programme of work in order to be compliant with the new General Data Protection Regulations (GDPR) once these took effect in May 2018.

The Executive approved £50,000 of resource to support GDPR implementation and following an invitation to tender, a number of suppliers put forward bids and one has been selected. They are due to commence their information audit on 20 November 2017 and complete it on 4 December 2017.

As noted at the previous meeting, the external specialist work is being done in conjunction with the work underway by Waverley officers on GDPR. Actions since the previous Audit Committee meeting undertaken include:

- Appointment of Project Manager and project planning activity for GDPR compliance;
- Appointment of GDPR 'champions' across the organisation;
- Agreement to work in partnership with East Hampshire and Havant on GDPR technical issues;
- Development of an online GDPR training materials to be rolled out across the Council;
- All staff briefings on GDPR;
- Development of a GDPR communications and engagement strategy.
- Plan to update the Information Governance Policy and associated procedures and refresh the strategy to ensure it is aligned to GDPR requirements

3. Recommendations relate to the control environment and hence the overall governance and risk management of the Council and it is important that agreed actions are completed within timeframes agreed with the relevant Head of Service.

Recommendation

It is recommended that the Committee:

1. considers the information contained in Annexe 1 and, following discussion at the Audit Committee meeting, identifies any action it wishes to be taken; and
2. notes the progress on the project to implement the new GDPR requirements and provides any comments to officers.

Background Papers

There are no background papers (as defined by Section 100D (5) of the Local Government Act 1972) relating to this report.

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Audit Recommendations overdue or due within next month


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Action Status	
	Cancelled
	Overdue; Neglected
	Unassigned; Check Progress
	Not Started; In Progress; Assigned
	Completed

Head of Service Taylor, Robin

Action Code & Description	IA16/22.001 Policies	The Council's Information Management Policy, Record Disposal and Retention Schedule and the Acceptable Use of IT policy were last updated over a year ago. The policies do not cover off the process to be followed in regard to the retention, sharing and disposal of manual or electronic data. The policies also do not cover the procedure to be followed if manual or electronic data is lost or subject to misappropriation.	Exit Meeting Date	02-Jun-2016	
			Due Date	03-Jul-2017	
Audit Report Code and Description		IA16/22 Information Security Governance			
Agreed Action		<p>The Council will update the Record Disposal and Retention Schedule to ensure it includes the preferred disposal method for all types of data.</p> <p>The Council will ensure that the Information Management policy is updated to include the procedure to be followed if manual data is lost or subject to misappropriation. It should also include Council procedure in regard to manual security measures or physical security re the sharing of all types of information.</p> <p>Both the Acceptable Use of IT policy and the Information Management policy will also be updated to include how data loss/misappropriation is reported to Senior Management.</p> <p>All policy and procedural documentation relating to Information Security Governance will be reviewed and updated where necessary on an annual basis going forward.</p>			
Status	 Overdue	Progress	50%	Head of Service	Robin Taylor; Robin Taylor
All Notes	PLEASE SEE COVERING REPORT INTRODUCTION PARA 2 RE UPDATE ON STATUS OF GDPR.			01-Mar-2017	

Action Code & Description	IA16/22.002 Storage of Records re ISO5489	As per the most recent Information Management Policy (Section 10), all records should be stored in accordance with ISO15489. The policy does not go on to state what the requirements of ISO15489 are.	Exit Meeting Date	02-Jun-2016	
			Due Date	03-Jul-2017	
Audit Report Code and Description		IA16/22 Information Security Governance			
Agreed Action		The Council will detail the requirements of ISO15489 within the Information Management Policy that staff will need to comply with to ensure records are stored appropriately.			
Status	 Overdue	Progress	50%	Head of Service	Robin Taylor
All Notes	PLEASE SEE COVERING REPORT INTRODUCTION PARA 2 RE UPDATE ON STATUS OF GDPR.				

Action Code & Description	IA16/22.004 Procedure	As per comment from the Borough Solicitor at the time of the audit, a documented procedure is not in place detailing how the Council upholds Information Security Governance responsibilities if staff normally responsible are unavailable. The Council also does not have a published structure chart in place showing the members of staff involved with Information Security Governance and the responsibilities they hold.	Exit Meeting Date	02-Jun-2016	
			Due Date	03-Jul-2017	
Audit Report Code and Description		IA16/22 Information Security Governance			
Agreed Action		The Council will ensure that the Information Governance Strategy is put into place as soon as possible. It will include the procedure to be followed in relation to upholding Information Security Governance responsibilities if staff members who are normally involved are unavailable. It will also include a structure chart which will detail the staff that are involved with Information Security Governance and the responsibilities they hold. The chart will be disseminated to all staff.			
Status	 Overdue	Progress	50%	Head of Service	Robin Taylor
All Notes	PLEASE SEE COVERING REPORT INTRODUCTION PARA 2 RE UPDATE ON STATUS OF GDPR.				