Appendix 1 - Progress on information governance issues and implementing releated audit recommendations

Introduction

Officers have been working to implement the agreed Information Governance Strategy 2016-19 to improve the maturity of the organisation and better understand and manage risk. The Strategy was reviewed by Audit and Standards Committee on 12 January 2016 and approved by Policy and Resources Committee on 11 February 2016.

The Strategy sets out that we will implement a risk-based approach and make use of the independent review of internal audit to identify areas requiring improvement. We are working with our third party internal auditors to that end and looking at areas of risk in an iterative way. This works by assessing a theme area from which we can then identify areas for a deeper dive (examples of this are included in the 2017/18 audit plan).

We are also making use of our third line of defence assessments to identify our strengths and weaknesses through independent and accredited penetration testing which drives improvement plans for existing and emerging threats. This contributes to our assurance for both the Public Service Network Code of Connection (PSN CoCo) for which we have recently passed our annual accreditation, as does the NHS Information Governance Toolkit assessment which is due at the end of March.

Implementing audit recommendations

The Committee has requested further update on the two areas below, which were identified by the Information Governance team requiring investigation and action, which have had Internal Audit assessment and agreed actions.

   Buildings and Systems Access Controls –

The audit and its follow up have identified a significant spread of issues across this area of risk, focussed on:

- the controls over our buildings
- some systems access processes for starters, leavers, suspended workers and transfers of staff, schools staff, contractors and volunteers.

The follow up audit acknowledged that significant progress has been made against many of the issues identified. However, as noted in the main body of this agenda item, some of the solutions are interim measures and the long-term nature of some of the concerns requires systemic change. This has been acknowledged as a key organisational priority and a Modernisation Project is underway to tackle the underlying causes.

A Business Process Improvement (BPI) report commissioned by the Project is being finalised which looks at the opportunities to deliver these processes in a different way. Key remaining priorities include ensuring assurance of the removal of access to external web hosted systems and for the removal of IT systems access for suspended schools staff. Meanwhile the Project is working through the systemic changes required across this complex and demanding area.

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       IT Waste Disposal –

The IT Waste Disposal Policy has now been reviewed and rewritten to ensure it is line with good practice and industry standards and covers all forms of ICT Equipment. The previous policy did not cover disposal of all devices types. However this needed to happen in line with the review of a whole suite of Information Governance policies. The "ICT Equipment Disposal Policy" as it now is, has been written, reviewed by the Information Governance Board and will be released as part of the Information Governance Policy suite before the end of March 2017.

This has delayed the undertaking of the formal risk assessment, which needed to be carried out in the context of the new policy. This will now be carried out over the next month. Follow on actions concerning the compliance of the existing contract will be carried out in the context of the new policy and risk assessment.