

MANAGEMENT ACTION PLAN

Directorate:	Chief Executive's Office
Audit report:	IT20/2013/14 – Review of Information Governance
Dated:	27 March 2014

PRIORITY RATINGS

Priority High (H) - major control weakness requiring immediate implementation of recommendation

Priority Medium (M) - existing procedures have a negative impact on internal control or the efficient use of resources

Priority Low (L) - recommendation represents good practice but its implementation is not fundamental to internal control

I agree to the actions below and accept overall accountability for their timely completion. I will inform Internal Audit if timescales are likely to be missed.

The auditor agrees that the actions set out below are satisfactory.

Lead Responsible Officer (HOS): Rachel Crossley on behalf of Ann Charlton

Auditors: Siva Sanmugarajah and Lyle Lumsden

Date: 4 April 2014

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Para Ref	Recommendation	Priority Rating	Management Action Proposed	Timescale for Action	Officer Responsible	Audit Agree?
5.10	Review the Information Governance guidance and procedures for reporting breaches in all services to include the appropriate links to relevant policies and officer levels to which breach reporting should be escalated. The use of a flowchart could aid understanding of breach reporting.	Medium	The guidance and procedures on reporting breaches will be reviewed. The use of a flowchart will be considered and updated on the S:net.	June 2014	Grisilda Ponniah, Corporate Information Governance Manager	✓
5.11	The production of the	Medium	The Breach report will	September 2014	Grisilda Ponniah, Corporate	✓

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5.22	<p>annual breach report should be formalised so that its purpose, frequency of production and reporting arrangements are clear. The Service should determine the appropriate forum to receive the annual breach report such as the Continual Improvement Board.</p> <p>Develop and communicate the 'one stop shop' page on the S:net on Information Governance. This should reference</p> <ul style="list-style-type: none"> the council's strategy for Information Governance; the roles of the Information Governance Team(s); key Information Governance policies such as Data Protection, Records Management, 	High	<p>continue to be produced annually with a clear purpose to identify any trends in data breaches and propose actions to address these where not already in place. The Annual Breach Report will be reported to the Information Governance Board which is expected to meet on a quarterly basis with the first meeting planned for late April 2014.</p> <p>One-stop shop S:net page already exists but can be reviewed to ensure these elements are all covered. All policies relating to Information Governance will be reviewed and updated with links to related policies published and maintained on the S:net.</p>	September 2014	Information Governance Manager Grisilda Ponniah, Corporate Information Governance Manager	√

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	<p>Caldicott Guardianship, and Information Technology (IT) Security Policy;</p> <ul style="list-style-type: none"> • Procedures to deal with data breaches; • Arrangements for periodic reporting to senior management and Members regarding Information Governance; • All policies should be clear, comprehensive and up to date. They should be regularly reviewed and tested to ensure that all links within S:net pages work. <p>The views of the Governance Panel should be sought on the inclusion of the Information Governance Policy as a Corporate Policy.</p>		Information Governance Policy will be referred to the Governance Panel to consider whether it should be included as a Corporate Policy.	September 2014	Grisilda Ponniah, Corporate Information Governance Manager	
5.29	Children's Information Governance Team should reinstate its presence on the S:net and should also include links to the various	High	The findings from this report have been included in a review of Information Governance arrangements.	September 2014	Liz Ball, Head of Performance and Support and Julia Bowman, Business and Development Manager	✓

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	Corporate Information Governance policies and procedures and requirements stipulated by the Caldicott Guardianship and the Information Commissioner's Office.		Julia Bowman, Business and Development Manager is now managing this element of the service and Liz Ball, Head of Performance and Support will be working with her to address the findings as set out in the report.			
5.44	Consider making the training on Information Governance mandatory to all staff in all the services in the Council and to those working with our partner agencies.	Medium	This will be presented to the Governance Panel for consideration. Council-wide Communications Campaign on Information Governance already scheduled to start in April 2014 which will help to raise awareness and increase understanding of staff responsibilities in this area.	September 2014 April 2014 and ongoing	Grisilda Ponniah, Corporate Information Governance Manager	√
5.45	Accurate and up to date training statistics on classroom courses and team meetings should be maintained by the Corporate Training Team	High	The Training Administration Team (TAT) are able to upload details of all courses and attendees into SAP if the trainers of courses provide	September 2014	All Information Governance Team Managers, Acting Organisation and People Development (OPD) Relationship Manager and Human Resource (HR)	√

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	(CTT) by ensuring attendance is confirmed to the CTT by the trainer.		them with course names, dates and list of attendees soon after delivering the courses. On a quarterly basis the TAT will check for nil returns against any uncanceled courses. The Organisation and People Development (OPD) Team and TAT will again trial the 'Instructors' Portal' in the SAP Learning Solutions module, which will enable trainers to input delegates' attendance directly to SAP via the portal.		Group Manager	
5.46	Training statistics should be made available to all line managers to ensure that staff are fully trained. The CTT should make the line managers aware that e-learning information via 'My Learning Extra' is available to them should managers require confirmation.	Medium	The TAT is able to provide training statistics including those on e-learning courses to all line managers on a quarterly basis. This will also inform line managers that TAT can access the statistics on e-learning via 'My Learning Extra'.	September 2014	Neil Bradley, HR Group Manager	√
5.68	The Corporate Information Governance Manager (CIGM) should work with	High	The CIGM and IMT should work together and the policy should be formally	June 2014	Paul Brocklehurst, Head of IMT and Grisilda Ponniah, Corporate Information	√

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	Information Management Technology (IMT) service and the sponsors of the Modern Worker Project to formulate a holistic policy for the Bring Your Own Device (BYOD) initiative. The policy should also make clear the considerations about the intended recipients of this functionality since there are cost implications to Surrey County Council.		approved by the Information Governance and Risk Board which meets for the first time in late April 2014.		Governance Manager	
5.69	The IT Networks and Security Platform Lead should continue to work closely with the CIGM on all IT projects with information governance implications to identify issues at the early stages of the projects and to take mitigating actions.	Medium	Agreed. The CIGM has been invited to the IT Security Group's meetings held quarterly.	Ongoing	Morgan Rees, IT Networks and Security Platform Lead and Grisilda Ponniah, Corporate Information Governance Manager	√
5.70	Clearly written procedures should be developed and if there is sufficient demand publish the policy on S:net to make staff aware of the steps they need to follow if	Medium	Agreed.	Ongoing	Morgan Rees, IT Networks and Security Platform Lead and Grisilda Ponniah, Corporate Information Governance Manager	√

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	they wish to volunteer to participate in BYOD. More importantly IMT should continue to monitor the Central Government approach and lobby for change.					
5.71	IMT should continue with the replacement of 'Good' with the MobileIron solution to ensure compliance with Public Sector Network (PSN) requirements.	High	Agreed.	September 2014	Paul Brocklehurst, Head of Information Management Technology	√
5.77	Services should be reminded to maintain the Freedom of Information database.	Low	Freedom of Information Officer to raise this issue at the Information Access Officers' meetings.	June 2014	Grisilda Ponniah, Corporate Information Governance Manager	√

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