



**BDBC Internal Audit Report on the Audit of Information Governance**

Audit work undertaken: October-November 2020      Report issued: February 2021

**1. Audit Opinion**

Internal Audit is able to offer Substantial Assurance (2) that there are adequate controls in place to ensure the integrity and operation of systems concerning

(1) Full Assurance

There is a comprehensive system of internal controls in place designed to achieve the system/function/process objectives. These controls are operating effectively and are being consistently applied.

(2) Substantial Assurance

Key controls designed to achieve the system/function/process objectives are in place. There are opportunities to enhance/strengthen those controls.

(3) Reasonable Assurance

Basic controls designed to achieve the system/function/process objectives are in place. Improvements are required if key controls are to be established.

(4) Limited Assurance

Minimal controls designed to achieve the system/function/process objectives are in place. Significant improvements are required if key controls are to be established.

**2. Audit Opinion History**

Year	2017/18	2018/19	2019/20	2020/21
Level of Assurance	n/a	Substantial	n/a	Substantial

### 3. Key Findings.

**Control Objective 1:** Information governance arrangements and practices minimise the risk of legislative and Information Management Policy non-compliance.

- GDPR/Data Protection compliance continues to be managed satisfactorily within Legal Services by the Data Protection Officer and whilst some policies do require review they remain sound and provide good governance towards GDPR/Data Protection. Policies will be reviewed in 2021 to align with the Smarter Ways of Working (SWOW) project.
- Corporately, governance is managed through the Information Governance Steering Group which has met regularly throughout 2020. The group has begun work on the ICO Accountability Framework Self-Assessment to ensure compliance with GDPR and from this an action plan will be developed to prioritise key areas to be addressed.
- The completion rate of the mandatory e-learning modules is mixed at 87% for data protection but 43% & 27% for FOI & Information Security respectively. If improvements are to be made in the latter two then guidance and enforcement should come from Senior Management.
- All new council projects involving the use of personal data must now undertake a data protection impact assessment which forms part of the new project management system, Verto. It is important that mechanisms to ensure the need to complete the assessment is identified, and completed in a timely manner are embedded into appropriate governance arrangements
- Information Governance is comprehensively addressed in the Corporate Risk Register, RR3, and with a recently updated Service Risk Register, with appropriate risks identified and mitigations in operation.
- A large amount of personal information has been collected in support of the Community Hub, established during the first lockdown of the Covid-19 pandemic and it is important that this is managed and disposed of in accordance with data protection principles.
- Legal Services Service Recovery Plans remain appropriate but are currently being reviewed to include Covid-19.

#### 4. Management Response

##### Head of Law and Governance (29/01/21)

Recommendations 1 to 3 are already in the work plan of the Information Governance Steering Group and it is appropriate to extend the remit of the Group to monitor the suite of e learning on information governance modules. I note the findings on recommendation 4 which is helpful and which will be addressed.

##### Data Protection Officer (01/02/21)

I would reiterate the comments of the Head of Law and Governance and the audit recommendations will be presented to the next meeting of the Information Governance Steering Group.

#### Summary of Recommendations

Rec No.	Recommendation	Category of Risk*	Action Agreed	Officer Responsible	Time Scale
1	An action plan is required to assist with compliance to the ICO self-assessment framework on GDPR compliance.	Significant	A report will be presented to SLT on 17 February where the views of SLT will be sought on what the council should be seeking to achieve through the self-assessment. Following this the Information Governance Steering Group will review and agree to an action plan.	IG Steering Group	April 21
2	Mechanisms are embedded and reviewed to ensure that the need to undertake Data Protection Impact Assessments (DPIA's) is identified at the earliest possible stage and that they are then completed in a timely manner.	Significant	The Project and Procurement Teams have DPIAs as part of their initial scoping templates.  DPIAs are a standing item on the IGSG agenda and, as a result, discussions around the need for a DPIA should be fed back through DMTs by their representatives on the group.	Head of Legal Services/ Head of T&I	Complete

Rec No.	Recommendation	Category of Risk*	Action Agreed	Officer Responsible	Time Scale
3	Staff are reminded of the mandatory requirement to complete information governance related e-learning modules. Senior Management action should be taken where they are not completed.	Significant	The IG Steering Group will receive extended reports on compliance and escalate to Executive Directors as appropriate.  HR send reminders to e-learning module owners in respect of mandatory e-learning modules.	IG Steering Group/ SLT	April 21
4	Personal information collected as part of the Community Hub work should be removed in accordance with data protection principles.	Significant	DPO to speak to the Economy & Culture Manager regarding this.	Head of Legal Services/ Head of Borough Develpt.	April 21

## 6. Timetable

Scope of audit agreed:	Fieldwork commenced:	Fieldwork completed:	Draft report issued:	Management responses received:	Final Report Issued:
02/11/20	02/11/20	18/12/20	08/01/21	01/02/21	03/02/21