DATA LABEL: PUBLIC

West Lothian Council

AUDIT COMMITTEE

INTERNAL AUDIT OF INFORMATION SECURITY

REPORT BY AUDIT, RISK AND COUNTER FRAUD MANAGER

A. PURPOSE OF REPORT

To inform the Audit Committee of the outcome of an internal audit of the management of information security breaches within the council.

B. RECOMMENDATION

It is recommended that the Audit Committee notes that control is considered to be unsound.

C. SUMMARY OF IMPLICATIONS

I	**Council Values**	Being honest, open and accountable, making best use of our resources.
II	**Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)**	The audit is relevant to risk WLC032 "Failure to meet the requirements of the new data protection legislation (GDPR)" and risk WLC007 "Failure to prepare, or effectively deploy, up to date information security policy and procedures".
III	**Implications for Scheme of Delegations to Officers**	None.
IV	**Impact on performance and performance Indicators**	Weaknesses in internal control may have an adverse impact on performance.
V	**Relevance to Single Outcome Agreement**	Our public services are high quality, continually improving, efficient and responsive to local people's needs.
VI	**Resources - (Financial, Staffing and Property)**	None.
VII	**Consideration at PDSP**	None.
VIII	**Other consultations**	Managers within Corporate Services as part of the audit process.

D. TERMS OF REPORT

As part of the 2016/17 audit plan we conducted an audit of the management of information security breaches and the outcome was reported to the Audit and Governance Committee on 19 December 2016. Our report concluded that control was unsound.

The action plan response to the report stated that the risk assessment process would be reviewed and a new process implemented. The response also stated that a review would be undertaken to assess the feasibility of introducing an electronic system for completing risk assessment templates.

The Audit and Governance Committee noted the contents of the report and agreed that a follow-up report on the progress with the action plan and review of procedures would be submitted to a future meeting of the Committee by the Head of Corporate Services.

The Head of Corporate Services submitted a progress report to the Audit Committee on 30 June 2017. This included revised data breach risk assessment procedures and revised risk assessment templates. The report advised that the actions identified in the internal audit report had been completed.

In accordance with the internal audit plan for 2018/19, a further audit has been undertaken of the management of information security breaches within the council. This included a follow up of the previous audit report issued in 2016. The audit fieldwork was undertaken in November 2018 and it was once again concluded that control was unsound.

The audit report includes an action plan containing agreed management actions. The action plan response states that an Objective workflow has been implemented from January 2019. The Objective system is the Council's electronic content management system, and further detail on the Objective workflow system is included in the action plan responses and in appendix F to the audit report.

A further audit of the process for managing information security breaches is included in the annual audit plan for 2019/20.

E. CONCLUSION

Our audit of the management of information security breaches within the council has concluded that control is unsound.

F. BACKGROUND REFERENCES

Report to the Audit and Governance Committee 19 December 2016: Internal Audit of Information Security Breaches

Report to the Audit Committee 30 June 2017: Information Security Breaches - Risk Assessment - Progress Report

Report to the Audit Committee 19 March 2018: Internal Audit Plan 2018/19.

Appendices/Attachments: Internal audit report dated 15 March 2019: Information Security

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