

## **SLOUGH BOROUGH COUNCIL**

**REPORT TO:** Audit & Corporate Governance Committee

**DATE:** 8<sup>th</sup> March 2018

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**WARD(S):** All

### **PART I** **FOR COMMENT & CONSIDERATION**

#### **UPDATE ON INFORMATION GOVERNANCE AUDIT ACTIONS AND BUSINESS CONTINUITY**

1. **Purpose of Report**

The purpose of this report is to:

- Respond to member request for an update at December 2017 Audit & Corporate Governance meeting
- Report to members on the progress of the implementation of Internal Audit recommendations relating to Information Governance and Business Continuity.

2. **Recommendation(s)/Proposed Action**

That details of the update on Information Governance Audit Actions and Business Continuity be noted.

3. **The Slough Joint Wellbeing Strategy, the JSNA and the Five Year Plan**

The [Slough Joint Wellbeing Strategy](#) (SJWS) is the document that details the priorities agreed for Slough with partner organisations. The SJWS has been developed using a comprehensive evidence base that includes the Joint Strategic Needs Assessment (JSNA). Both are clearly linked and must be used in conjunction when preparing your report. They have been combined in the Slough Wellbeing Board report template to enable you to provide supporting information highlighting the link between the SJWS and JSNA priorities.

3a. **Slough Joint Wellbeing Strategy Priorities –**

The actions contained within the attached reports are designed to improve the governance of the organisation and will contribute to all of the emerging Community Strategy Priorities

**Priorities:**

- *Economy and Skills*
- *Health and Wellbeing*
- *Regeneration and Environment*

- *Housing*
- *Safer Communities*

3b. **Five Year Plan Outcomes**

The actions contained within this report will assist in achieving all of the five year plan outcomes

4. **Other Implications**

(a) Financial

There are no financial implications of proposed action

(b) Risk Management

<i>Recommendation</i>	<i>Risk/Threat/Opportunity</i>	<i>Mitigation(s)</i>
<i>That Audit &amp; Risk Committee is requested to comment on and note the attached reports</i>	<i>This report concerns risk management across the Council</i>	

(c) Human Rights Act and Other Legal Implications

There are no Human Rights Act or other legal implications in this report

(d) Equalities Impact Assessment

There is no identified need for an EIA

5. **Supporting Information**

5.1 **Information Governance Audit – December 2016**

5.1.1 An audit of Information Governance was undertaken as part of the annual internal audit plan in December 2016. This audit concluded that the Council could not take assurance that the controls in place to manage the risks associated with this area are suitably designed and consistently applied, with particular weaknesses identified in the design of the control framework. Within the report, a total of 2 high, 12 medium and 4 low priority management actions were agreed.

5.2 **Increased Importance**

5.2.1 With the introduction of the General Data Protection Regulations in May 2018, requiring more rigorous controls, the Council will need to be assured that robust information governance processes are embedded within the culture and working practices of the Council. Furthermore, as the Council moves towards more collaborative working with strategic partners, in particular the NHS, there is a need to demonstrate robust compliance with the Data Protection Act and GDPR requirements in relation to the security of data.

### 5.3 **Information Governance Audit Revisited – November 2017**

5.3.1 In view of the increased importance, in November 2017, RSM reviewed the high and medium priority actions to determine the progress made against each and to provide assurance that these actions have been fully implemented.

5.3.2 This audit concluded a “Partial Assurance”. It found that while the Council had taken action to address some of the failings identified in the previous report – where a “No assurance” opinion was provided, a number of issues remained. Mainly in the area of updating key corporate policies. This report identifies 1 high, 10 medium and 2 low actions outstanding. Revised target delivery dates have been agreed.

### 5.4 **Current Position – March 2018**

Significant activity has been undertaken in recent months in preparation for the implementation of GDPR on May 25<sup>th</sup> 2018. A series of Data Mapping workshops – with RSM oversight – are underway across the authority to review data silos and working practices. Key policies are being reviewed in line with best practice and revised documents being authorised by the Council's Information Governance Board. The current position on audit actions is that only 2 medium priority actions remain outstanding. Both of these actions are partially completed - one of these is scheduled to be finalised by 31<sup>st</sup> March 2018 and the other by 31<sup>st</sup> July 2018.

## 6. **Business Continuity Update - February 2018**

### **Background**

The Council has to have robust Business Continuity plan (BCP) as this is stated in the Civil Contingencies Act 2004. Business Continuity Management was also highlighted in an internal audit report and is still a high risk. CMT backed a Project plan to resolve the lack of Business Continuity.

### **Update**

Unfortunately due to the senior management restructure the planned project is behind schedule. I took the opportunity to pilot both the new BIA template and Recover plan template with Housing and Neighbourhoods as they had already carried out their restructure. This was completed in January 2018. In the whole the templates are fit for purpose with few updates. The major issue that was gathered from feed back is that more training is required for the managers completing the templates. This training is being put together. Once that has been completed the project can be rolled out to the rest of the council.

In conclusion the project plan is behind schedule due to the restructure. Also a growth bid is being put together for a staff resource allocated to Business continuity as highlighted in the audit report. The BCM project will shortly be rolled out to the council to complete the templates with support from Business Continuity and response Manager.

7. **Comments of Other Committees**

There are no comments from other Committees.

8. **Conclusion**

Members are requested to note substantial progress in the implementation of Information Governance Audit management actions.

9. **Appendices Attached**

A Information Governance Audit Report 2017/18

B Business Continuity Audit Report

10. **Background Papers**

None