

## Appendix 2 - Incomplete High Risk Management Actions

Title	Action Plan	Management Actions	Target Date	Recommendation Rating	Completion Notes	Implementation Status
- Person Responsible: <b>Simon Pallett</b>						
Information Governance	The Information Governance Policy was last reviewed and updated in 2012; however the arrangements and processes documented within it had not been fully established. The policy was therefore not fully reflective of the current IG environment within the Council.	The Information Governance Policy will be reviewed and updated to ensure it reflects the arrangements and processes within the Council, in line with the HSCIC guidance, including; <ul style="list-style-type: none"> <li>• Roles and responsibilities, covering senior IG roles (Caldicott Guardian, SIRO and IG Lead), other key staff roles in relation to IG as well the responsibilities of the wider workforce;</li> <li>• The specific resources within the Council to fulfil these roles.</li> <li>• The key policies underpinning the overarching Information Governance Policy;</li> <li>• Governance arrangements for overseeing the IG agenda within the Council;</li> <li>• Processes for delivering training and awareness programmes to staff; and</li> <li>• Arrangements for reporting, escalating and monitoring IG incidents and breaches.</li> </ul> Once updated, the policy will be presented to the IT and Information Governance Board for approval, and then subsequently circulated to staff and made accessible via the intranet. The policy will be reviewed annually thereafter, with version control included within document to record approval and next review details.	31/3/2017	High	In progress	Partially Completed
Business Continuity & IT Disaster Recovery	Recovery time objectives for SBC systems and data have not been formally agreed increasing the risk that in the event of an incident incorrect recovery decisions could be made impacting operational capability.	Management will ensure that arvato provide recovery time profiles for key systems as soon as the DR infrastructure has been implemented, which will include the provision of recovery servers.	31/3/2017	High	Follow audit amended findings	No Action Taken
Information Governance	The Council has not undertaken a data flow mapping exercise and there was also no documented	The Council will undertake a data flow mapping exercise to ensure all flows, both inbound and	30/9/2017	High		

	plan to undertake such an exercise.	outbound, of person identifiable and sensitive information in all service areas have been identified mapped and recorded. The information flows will be risk assessed, with necessary actions identified to address risks highlighted. The outcome of the mapping exercise and the risks identified will be reviewed by the IT and Information Governance Board, prior to subsequently being reported to CMT.				
- Person Responsible: <b>Phil Brown</b>						
Risk Management	At the time of our audit, and following the go-live of Intalex in November 2016, the system had not been rolled out at a Directorate level.	The Council will agree the roll out of Intalex to record directorate level risks with each directorate.  This will include agreement of responsibilities at directorate level to update risks on a regular basis.	30/6/2017	High	This action is near to completion and once the RSM system is operation throughout the Council this will be done	Partially Completed
- Person Responsible: <b>Joe Carter</b>						
Business Continuity Planning Arrangements	A Business Impact Analysis (BIA) was last undertaken in July 2013 and has not been reviewed and updated since.	"The Council will establish and maintain a documented process for undertaking business impact analysis and risk assessments at Service, Directorate and Council-wide level that; • Establishes the context of the assessment and defines the criteria for evaluating the potential impact of a disruptive incident; • Takes into account legal and other commitments; • Includes systematic analysis and prioritisation of risk treatments; • Defines the required output from the business impact analysis and risk assessment; and • Specifies the requirements for this information to be kept up-to-date. The business impact analysis will include; • Identifying activities that support the provision of services; • Assessing the impacts over time of not performing these activities; • Setting prioritised timeframes for resuming these activities at a specified minimum acceptable level (RTO - Recovery Time Objective), taking into consideration the time within which the impacts of not resuming them would become	30/9/2016	High	Partially Complete as per Follow Up audit 04/17	Partially Completed

		<p>unacceptable (MTPD - Maximum Tolerable Period of Disruption); and</p> <ul style="list-style-type: none"> <li>Identifying dependencies and supporting resources for these activities, including suppliers and outsource partners.</li> </ul> <p>The risk assessment will include;</p> <ul style="list-style-type: none"> <li>Identifying risks of disruption to the Council's prioritised activities and the processes, systems and resources that support them;</li> <li>Systematically analysing risks in line with the Council's risk management methodology;</li> <li>Evaluating which risks require treatment/mitigation; and</li> <li>Identifying treatments/mitigations in line with business continuity objectives and the Council's risk appetite.</li> </ul> <p>The processes will be documented within the Council's overarching Business Continuity Management Policy.</p> <p>risk appetite.</p> <p>The processes will be documented within the Council's overarching Business Continuity Management Policy.</p> <p>"</p>				
- Person Responsible: <b>Roger Parkin</b>						
Matrix Management of Agency Staff	Staff were not inputting sufficient notes into the Matrix system when approving staff, for instance, whether sufficient budget is available.	<p>We will ensure that all staff approving new agency workers or approving the extension of existing agency contracts on the Matrix system input relevant notes of checks that have been carried out, for instance:</p> <ul style="list-style-type: none"> <li>Whether adequate budget is available for the post;</li> <li>The post was required urgently out of hours and therefore, there is only authorisation from one member of staff; or</li> <li>The reason why the contract has been extended.</li> </ul> <p>If this information is not detailed then the approval will be refused.</p>	31/5/2016	High	No Action	No Action Taken
- Person Responsible: <b>Frederick Narmh</b>						
Matrix Management of Agency Staff	We noted that the Council did not have an assigned Contract Manager for Matrix.	The Council will formally assign a Contract Manager who will have responsibility for managing the Matrix contract.	31/5/2016	High	Corporate procurement will continue to manage the Matrix contract on an interim basis till the contract expires. Following the eminent expiry of the Matrix contract in 2018, it is anticipated	Partially Completed

						that HR will actively manage the new service contract with a dedicated resource. HR to assist in Managing this contract that has been extended for a further year.  As per FN A fixed term contract person will be appointed to manage Matrix by mid Oct 2017	
- Person Responsible: <b>Vijay McGuire</b>							
General Ledger	<p>We were unable to obtain the Council's contract with Trustmarque and therefore were unable to establish the agreement in place for the back-up of the General Ledger and any disaster recovery procedures and test whether these occur.</p> <p>In addition, further review with key staff within the organisation identified that no assurance is currently received from Trustmarque that backups are undertaken or tested.</p>	The Council will ensure that the frequency of backups is stated within the contract with Trustmarque and that assurance is received that backups are conducted regularly and disaster recovery arrangements are tested for the ledger.	30/6/2017	High	cannot complete it without Finance involvement and we have asked for copies of the contract with Trustmarq which are not yet been made available. I have asked again and copied you into the request  This issue is now between Barry and Simon  Barry Stratfull will talk to Trustmarque to see who our contract is with and take matters further	No Action Taken	