

Overdue High Risk Actions By Aged Analysis (as at 15 December 2023)

<div style="background-color: yellow; padding: 2px;"> <b>&gt; 1 Year &lt; 2 Years</b> </div>											
Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis
21/22	24.21/22 GDPR Governance	The Data Flow Capture Spreadsheet will be updated to include the following areas: • name and contact details of joint controller (if applicable); • categories of individuals; • names of third countries or international organisations that personal data are transferred to (if applicable); • safeguards for exceptional transfers of personal data to third countries or international organisations (if applicable); • Data Protection Act 2018 Schedule 1 Condition for processing; • GDPR Article 6 lawful basis for processing; • link to retention and erasure policy document; and • whether personal data retained and erased in accordance with the retention policy document - reasons for not adhering to retention policy document (if applicable).	High	Alex Cowen	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will ensure that its IT estate is brought up to date in terms of patching as soon as possible	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/10/2022	Overdue	406	> 1 Year < 2 Years
22/23	7.22/23 Leavers Process	We will ascertain why a leavers report was not provided to IT for April 2022 and take any action to ensure reports are provided consistently. Where reports are not received in the first week of the month, the IT Team will confirm with HR whether there any leavers.	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years

<div style="background-color: yellow; padding: 2px;"> <b>&gt; Six Months &lt; 1 Year</b> </div>											
Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis
22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	The DR Policy The Council will document a Disaster Recovery Policy, independent of the Disaster Recovery Plan	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/03/23	Overdue	255	> Six Months < 1 Year

Overdue Medium Risk Actions By Aged Analysis (as at 15 December 2023)

> 1 Year < 2 Years											
Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis
21/22	24.21/22 GDPR Governance	The Information and Records Management Policy will be reviewed and updated to include details on managing the security of records and disciplinary information. In addition, the Corporate Retention Schedule will be updated to include: <ul style="list-style-type: none"> <li>• format of the record (electronic, paper etc.);</li> <li>• storage location;</li> <li>• record owner;</li> <li>• retention trigger;</li> <li>• action at the end of retention period (review for further retention, anonymise, destroy etc.); and</li> <li>• method of disposal.</li> </ul> Following this, the Schedule will be fully completed and referenced in the Information and Records Management Policy accordingly.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	24.21/22 GDPR Governance	The Council will formally document and agree the lawful bases for the different types of data processed by the organisation. This will include the rationale for the lawful bases as relevant. Subsequently, this will be communicated to relevant staff.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/06/22	Overdue	533	> 1 Year < 2 Years
21/22	24.21/22 GDPR Governance	The Council will ensure that all forms used to capture consent under GDPR cover: <ul style="list-style-type: none"> <li>• the name of the organisation/any third-party controllers who will rely on the consent;</li> <li>• a copy of the privacy notice or reference to this and where it is available;</li> <li>• why the organisation wants the data (the purposes of the processing);</li> <li>• what the organisation will do with the data (the processing activities);</li> <li>• whether the data will be shared with any other organisations;</li> <li>• the fact that data subjects can withdraw their consent at any time; and</li> <li>• a recording of explicit consent (rather than implied), including the date when consent was given.</li> </ul>	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/06/22	Overdue	533	> 1 Year < 2 Years

21/22	24.21/22 GDPR Governance	The Council will ensure that a register of third parties to whom 'in scope' (personal) data is transferred to is in place and records: • name of the third party; • whether there will be sharing of personal data with the third party (if it is a general register for all third parties/contracts etc.); • whether a formal contract or other legal act is in place; • contract owner; • whether the contract contains the required contractual data confidentiality terms and conditions / clauses; • start and end dates of the contract; and • other contractual protections that have been put in place/assessed (especially where a contract is not in place), such as reviewing the third party's terms and conditions or privacy notices, or the use of a signed data/information sharing agreement. In addition, the Council will ensure that any Terms and Conditions used within agreements are in line with ICO guidance, and that data sharing agreements cover: • the purpose, or purposes, of the sharing, including aims and benefits; • the potential recipients or types of recipient of the data, the circumstances in which they will have access and their contact details; • procedures for including additional organisations in the data sharing arrangement and for dealing with cases where an organisation needs to be excluded from the sharing; • the data to be shared, including permissions for certain data items (i.e. only to be accessed by trained staff); • basis for sharing (lawful basis); • data quality – accuracy, relevance, compatibility/usability etc.; • data security, including for the transmission of data; • retention of shared data, including procedures for dealing with cases where	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/03/22	Overdue	624	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will ensure documentation is retained for its 'gold' image, including applications to be installed or standard applications to be disabled/removed	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will document within a policy its approach to how default accounts in computers and network devices should be securely configured. This will include the renaming and disabling of default accounts	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will retain a central register of all shared accounts in use, with the justification for this recorded. This will then be subject to periodic review with a view to remove shared accounts where possible	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will document a user account access management procedure covering areas.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will document an administrator account management policy/procedure covering areas	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will document a boundary firewall policy covering different areas.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The IT Password Policy will be updated	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	441	> 1 Year < 2 Years
21/22	29.21/22 Cyber Essentials	The Council will review administrator account levels of access with respect to general browsing (social media etc.) and webmail with a view to restrict this as relevant.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/10/22	Overdue	410	> 1 Year < 2 Years

22/23	7.22/23 Leavers Process	We will define the process for the permanent deletion of leaver user accounts and how this can be extended including who must authorise this, as well as what action to take when leaver notifications are missing information, such as the user's leaving date. We will also complete the date of next review placeholder on the Starter/Leaver Process document and make the new version available to staff.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/10/22	Overdue	410	> 1 Year < 2 Years
22/23	7.22/23 Leavers Process	We will establish an approval process where user accounts need to remain active for longer than three months. This will require approval of the Group Manager – IT and relevant Associate Director of the department the employee relates. We will also follow up on user accounts that have been approved to be extended to ensure they are permanently deleted after the extension period.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/11/22	Overdue	380	> 1 Year < 2 Years

**> Six Months < 1 Year**

Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis
21/22	29.21/22 Cyber Essentials	The Council will periodically review and update the Internet Browser's in use across its IT estate.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/12/22	Overdue	349	> Six Months < 1 Year
21/22	29.21/22 Cyber Essentials	The Council will ensure that auto updates are enforced on all devices where possible, including mobile devices	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/12/22	Overdue	349	> Six Months < 1 Year
22/23	7.22/23 Leavers Process	We will establish a six-monthly dip sample of starters, leavers and current user access over the period to ensure starters and leavers have been processed and current user access is consistent with the role of the related employees	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/12/22	Overdue	349	> Six Months < 1 Year
22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	IT Business Continuity Plan	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/05/23	Overdue	198	> Six Months < 1 Year
22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	Lessons Learnt The Council will document a formal "lessons learnt" process for IT business continuity and disaster recovery. This will include the use of a template report and action plan.	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/03/23	Overdue	259	> Six Months < 1 Year

**><Six Months**

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22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	Business Impact Analysis (BIA)	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	29/09/23	Overdue	77	Three Months
22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	Applications List The Council will ensure that a central register of all applications is retained with priority of recovery for applications, either individually or by group	Medium	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	29/09/23	Overdue	77	Three Months

Overdue Low Risk Actions By Aged Analysis (as at 15 December 2023)

> 1 Year < 2 Years											
Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis
21/22	29.21/22 Cyber Essentials	The Council will document the business requirement for external access to its routers and firewalls with approval of this retained	Low	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/12/22	Overdue	349	> Six Months < 1 Year