AUDIT REPORT 17'016

SOCIAL CARE - INFORMATION GOVERNANCE

EXECUTIVE SUMMARY

The annual internal audit plan for 2017/18 provides for a review to be undertaken of how information relating to social care service users is recorded, accessed and kept up to date. Effective controls in this area are particularly important due to the sensitive nature of much of the information held. In addition, the council has duties under data protection regulations, and breaches of these regulations can result in censure and substantial financial penalties being levied by the Information Commissioner's office.

This review focused on access controls around the management of case files. This included consideration of who can view, add, amend or delete information, recognising that restricted access has to be balanced with a need for prompt availability of information for those employees who require it for the effective delivery of services.

The council uses a system known as CareFirst to record and manage social care cases for both adult and children's services. CareFirst is a long standing widely used application within the public sector for recording social care data. Most of the service user data is available on CareFirst, with some data retained separately either on a council IT server or in paper files.

With large volumes of data collected by many different officers over an extended period, the holding of all information on a single system has not been possible. This increases the risk that not all information on any one service user will be readily accessible, although Case Recording Procedures have been implemented to provide guidance to officers on how service user data should be recorded and saved.

In terms of issues arising in the course of this audit the main points raised for management consideration and attention relate to:

- Evaluating whether, with improving technology, it is feasible to strengthen case recording procedures such that all data ultimately can be recorded in a single file for each service user.
- Reviewing the access arrangements for CareFirst to limit as far as is practicable access to case files only to those officers who need to see them.
- Improving procedures for auditing who has accessed files and the reason for that access through formal recording of supervisory reviews of system audit logs

- Strengthening password controls, both the format of the password (using a range of characters, digits, capital letters etc.) and making it a requirement to change passwords periodically
- Ensuring to the extent possible that the same processes are applied in respect of case files held both for adult services (now directed by the Integration Joint Board) and for children's services provided by the council.

This audit review is timely given the impending coming in to force of new General Data Protection Regulations in 2018, and provides management with an opportunity to reflect on current information management practice in services where large volumes of complex and sensitive data are held.

Moray Council

Internal Audit Section

Recommendations – Social Care Information Governance

Risk Ratings for Recommendations						
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	Medium	Less critically important controls absent, not being operated as designed or could be improved.	Low		Lower level controls absent, not being operated as designed or could be improved.
No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
Key Control: Effective Information control systems in operation to protect and secure access to sensitive information.						
6.1	Investigation should be undertaken to explore the possibilities of developing a single case recording system.	High	Yes	Planning to begin upgrade to new version of CareFirst which includes document management. Adult and Children Services will jointly review their document management requirements with a view of upgrading to the new Care First System for the future recording	Commissioning & Performance Manager Head of Integrated Children's Serv	31/07/2020

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Risk Ratings for Recommendations						
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	Medium	Less critically important controls absent, not being operated as designed or could be improved.		Low	Lower level controls absent, not being operated as designed or could be improved.
No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
				of all case documents.		
6.2	A review of access rights to CareFirst, Shared Drive and Paper Files should be undertaken with the purpose that officers should only be authorised to view case file information required to undertake their duties.	High	Yes	A review to meet the requirements of both Services will be undertaken, however, implementation may be dependent on the upgrade to the new Care First System.	Commissioning & Performance Manager on behalf of both services	31/12/2018
6.3	The Service should develop a more co-ordinated approach to ensure regular and effective information security practices are communicated across the Service.	Medium	Yes	Regular bulletin for teams.	Commissioning & Performance Manager for both services	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
6.4	A representative from the Integration Joint Board should attend the Information Assurance Group.	Medium	Yes	Invite for a representative to join the Information Assurance Group will be issued .to the Integration Joint Board.	Commissioning & Performance Manager	Complete
6.5	Any breaches in information security should be reported to the Information Assurance Group. This would allow the control environment to be reviewed and for recommending improvements to systems.	Medium	Yes	In consultation with the Information Assurance Group (IAG), procedures will be developed across both services for standard reporting of breaches in	Commissioning & Performance Manager	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
				information security to the IAG.		
6.6	Regular reviews of Case Files to ensure completeness should be undertaken by Adult Services as is currently undertaken within Children and Criminal Justice Services.	High	Yes	Immediate re-introduction of regular audits of case files within Adult Services. However both Adult and Children Services to explore the possibility of agreeing a uniform case auditing and reporting system.	Head of Community Care Head of Integrated Children's Serv	30/06/2018
6.7	A "Summary Report on Case File Auditing" should be undertaken on a yearly basis.	Medium	Yes	Already actioned through QAPPT and single agency	Head of Integrated Children's Serv	Implemented

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				processes To be reported to Practice Governance Board	Commissioning & Performance Manager	31/08/2018
6.8	A reminder should be issued to all Managers and Senior Officers within Children's Services and Criminal Justice of the importance of completing Case File Reviews at the required intervals.	Medium	Yes	Already actioned – quarterly reports coming to ICS	Head of Integrated Children's Serv	Implemented
6.9	Service improvements highlighted from case file reviews should result in a documented improvement plan for implementation by the Service.	Medium	Yes	ICS working to improve communication of audit findings through PGG and developing PRISM. To be reported to Practice Governance	Head of Integrated Children's Serv Commissioning & Performance Manager	Ongoing 31/08/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
				Board.		
6.10	Access to restricted case files within the CareFirst System should only be allowed after authority is obtained from a Team Manager.	Medium	Yes	Review process with a view of implementing new authorisation procedures.	Commissioning & Performance Manager	31/12/2018
6.11	Clear description should be detailed of why access is required by an officer to a Restricted Case File.	Medium	Yes	As 5.10	Commissioning & Performance Manager	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
6.12	Access by any officer including IT Officers and Support should be clearly recorded within the Restricted Case File Access Report.	High	Yes	Investigate feasibility for amendment to report. Agreed in principle- Any access by officers out with SWS should be scrutinised by a senior member of SWS.	Commissioning & Performance Manager	30/06/2018
6.13	Evidence should be retained to confirm restricted Case File access report has been reviewed by a Senior Manager.	Low	Yes	Agreed in principle- Will review report distribution list and guidance across both Services. Closely linked to 5.10-5.13 above	Commissioning & Performance Manager Head of Integrated Children's Serv	30/06/2018
6.14	Authorisation should also be obtained from a senior manager of any access required to a restricted case file when information is stored	Medium	Yes	Review current process and investigate viability of new processes.	Commissioning & Performance Manager	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
	within the Shared Drive or Paper File.				Strategy Officer	
6.15	The Service should develop clear guidelines regarding the use of mobile storage devices e.g. encrypted USB sticks.	Medium	Yes	Guidance will be issued to all officers incorporating Corporate Information Security Policies. Also be incorporated into 6.3 using corporate guidance; ICS has issued recent guidance circulated from GDPR officer.	Commissioning & Performance Manager	31/12/2018
6.16	CareFirst Case Files should be deleted in accordance with the Council Document Retention Policy. Deletion of any case files	High	Yes	Procedures in both Services include a requirement for a Senior	Commissioning & Performance Manager	30/06/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
	should only be actioned after authority of a senior manager within the Service is obtained.			Manager to delete a file. Any files highlighted for deletion by System Support will also require the authority of a Social Work Manager.	Head of Integrated Children's Serv	
6.17	Information held within the Shared Drive and Paper File should be deleted and destroyed at the same time as deleting the case file within CareFirst.	Medium	Yes	Procedures within both Services include this requirement- Ongoing review undertaken to ensure compliance.	Commissioning & Performance Manager Head of Integrated Children's Serv	30/06/2018
6.18	Access rights to the CareFirst System should be suspended where an officer has not accessed the system for a period of 3 months. Any reinstatement of	Medium	Yes	Agreed- System Support will retain evidence of Service/ Team Manager	Commissioning & Performance Manager	Implemented

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	access should require the authorisation of a Team or Service Manager.			authorisation for reinstatement of officer access to CareFirst. Review of compliance to be undertaken	Commissioning & Performance Manager	August 2018
6.19	The revised Case Recording Procedures within Adult Services currently in draft, should be agreed and issued.	Medium	Yes	Already actioned.	Performance Officer.	Implemented

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6.20	Reference should be made to the Information Security Policy within the Case Recording Procedure to ensure officers have a greater awareness of good information management practices.	Low	Yes	Implemented within Adult Services. Review recording policies to ensure reference to ISP's within Children Services	Head of Community Care Head of Integrated Children's Serv	31/12/18
6.21	The category index used for paper files should be reviewed and amended accordingly to reflect current information recording requirements.	Low	Yes	Short term working group from both adult & children's services to agree recording requirements.	Commissioning & Performance Manager	31/12/2018

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6.22	The Information Security Policy should be reviewed and updated as required.	Medium	Yes	A review of the Corporate Information Security Policy will be included within the ICT Infrastructure Security Projects for 2018/19.	ICT Infrastructure Manager	31/03/2019
6.23	Documented assurance should be obtained from the CareFirst Software Supplier of the requirement for confidentiality of personal information when technical access is required for updates etc.	Medium	Yes	To follow up with OLM	Information Systems Officer	30/09/2018
6.24	Consideration should be given to providing all officers with regular briefing sessions regarding the recording, saving etc of service user information.	Medium	Yes	Annual staff briefing

Regular bulletin (see also 5.3) | Head of Integrated Children's Serv

Commissioning & Performance Manager | 31/12/2018 |

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6.25	Consideration should be given in partnership with the ICT Applications Manager whether the Information Systems Team within the Community Care Service should be moved to be under the line management of the Corporate ICT Section.	Low	Yes	Investigate advantages/ disadvantages of this recommendation	Head of Integrated Children's Serv. Commissioning & Performance Manager Joint Head of HR and ICT	31/03/2019