

# Moray Council

## Internal Audit Section

**DEPARTMENT:** Health and Social Care Moray

**SUBJECT:** Social Care & CareFirst System Information Governance Review

**REPORT REF:** 23'012

### Follow Up Audit Review

<b>Risk Ratings for Recommendations</b>						
<b>High</b>	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	<b>Medium</b>	Less critically important controls absent, not being operated as designed or could be improved.		<b>Low</b>	Lower level controls absent, not being operated as designed or could be improved.
<b>No.</b>	<b>Audit Recommendation</b>	<b>Priority</b>	<b>Accepted (Yes/ No)</b>	<b>Date of Completion</b>	<b>Status / Explanation</b>	
<b>Key Control:</b> Effective information control systems in operation to protect and secure access to social care data.						
<b>5.01</b>	Investigation should be undertaken to explore the possibilities of developing a single case recording system.	Medium	Yes	30/11/2022 Revised implementation date 25/01/2024	Part Implemented- The Service has investigated the possibility of developing a single case recording system. A committee report seeking approval for the replacement of the CareFirst System is planned to be reported to the Moray Integration Joint Board on 25 January 2024.	
<b>5.02</b>	Additional access controls to the CareFirst System should be introduced to include time limited	Medium	Yes	31/10/2022	Implemented- Password parameters for CareFirst have been adjusted to require users to change their password every 90 days.	

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	access and more complex password combination requirements.					
<b>5.03</b>	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.	Medium	Yes	31/10/2022 Revised Implementation date 25/01/2024 to provide update on status	Outstanding- The implementation of this recommendation is dependent on a planned replacement of the CareFirst System. The Service is seeking approval for the replacement of the CareFirst System with a report to the Moray Integration Joint Board on 25 January 2024.	
<b>5.04</b>	An officer should record a clear description within the CareFirst System to explain why access is required to a Restricted Case File.	Medium	Yes	31/12/2022	Implemented- Reminders were disseminated to officers highlighting the need to provide a clear explanation of reasons for access to restricted files within CareFirst. Audit testing found explanations detailing the reasons for access to restricted files.	

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	Where restricted service user records are also held within the shared drive and paper records, a clear description should also be maintained detailing reasons for access.			Revised Implementation date 25/01/2024 to provide update on status	Outstanding– This recommendation remains outstanding as there will be a need to introduce systems and controls to ensure implementation. If a replacement to the CareFirst System is agreed upon, the need for a single case recording system will reduce the requirement for saving service user information on a shared drive or paper file.
<b>5.05</b>	CareFirst Case Files should be deleted in accordance with the Council Document Retention Policy. Deletion of case files should only be actioned after the authority of a senior manager is obtained.	Medium	Yes	31/12/2022 Revised Implementation Date 31/12/2023	Part Implemented- An officer was appointed in May 2023 with responsibility for deleting case files. Audit testing confirmed the deletion of service user information but has highlighted a requirement for maintaining additional records to evidence compliance with the Council's Document Retention Policy.
<b>5.06</b>	The deletion of CareFirst System files should also include	Medium	Yes	31/12/2022	Outstanding– Implementation of this recommendation has been delayed due to

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	information held regarding a service user within the shared drive and paper files.			Revised Implementation date 30/04/2024	long term staff absence within the Service. Revised Implementation date agreed with Service as 30/04/2024.	
<b>5.07</b>	The re-introduction of regular reviews of case files should be undertaken by Managers within Adult, Children and Families Services	Medium	Yes	31/10/2022	Implemented– Service has re-introduced the requirement for case file reviews by managers.	
<b>5.08</b>	Case recording procedures should be updated for Adult, Children and Families Services	Medium	Yes	31/12/2022 Revised implementation date 30/04/2024	Part Implemented– A revised case recording procedure has been drafted but still requires approval by the Service. Revised implementation date agreed with Service as 30/04/2024.	
<b>5.09</b>	A review should be undertaken of the security of paper records held within the Community Care	Medium	Yes	Completed	Implemented– The Community Care Finance Service are now based within the Headquarters. In addition officers have been	

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	Finance Offices to ensure service user information can only be viewed by authorised officers				reminded of the clear desk policy.