Moray Council

Internal Audit Section

DEPARTMENT: **Health and Social Care Moray**

SUBJECT: **Information Management**

REPORT REF: **23'009**

Follow Up Audit Review

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)**	**Date of Completion**	**Status / Explanation**
Key Control: Appropriate arrangements are in place for secure handling and sharing of personal data.					
5.01	Data Protection Impact Assessments (DPIAs) should be undertaken to determine whether additional safeguards need to be implemented where information concerning service users is shared with care providers.	High	Yes	31/12/2023	**Part Implemented**. This follow up review within Health and Social Care Moray found that Data Protection Impact Assessments (DPIAs) have been completed for care providers within Children Services. However, in Adult Services, work is still ongoing, and due to the number of care providers, significant work is still required before all of the necessary

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					DPIAs are completed. This recommendation is linked to the KPMG review of Adult Social Care Commissioning, which highlighted the need for agreement of new contracts with care providers. Due to the multi-year timescale, it is intended that another audit review will be included in a future Audit Plan to evidence implementation.	
5.02	Assurances should be obtained that appropriate data protection training has been undertaken by NHS Grampian employed officers requiring access to Council administered databases.	Medium	Yes	31/03/2023	**Implemented.** The application process for NHS employed officers to gain access to Council Systems has been amended to include the requirement to disclose the date that Data Protection training was last completed. NHS Grampian has also provided assurances that officers are required to complete annual refresher training on Data Protection.	
5.03	Access to the Staffplan Software Application used to schedule visits	Medium	Yes	31/03/2023	**Outstanding.** Further investigations found that establishing individual log in access would	

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	by Care Workers to service users should require individual user login and password controls.				require significant development and resources to implement. As the system has no link to other software applications, e.g., payroll, this recommendation is not considered a priority at the moment but will be reviewed again in the future. However, all officers using StaffPlan are to be reminded of good ICT security practices, e.g., locking the screen to prevent unauthorised access.	
5.04	Regular reviews should be undertaken to confirm the access requirement to the Occupational Therapy Stores Management System by NHS Grampian employed officers.	Medium	Yes	31/03/2023	**Implemented**. A process of regularly reviewing officer access requirements to the Occupational Therapy Stores Management System is now in place.	

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5.05	The Council and NHS Grampian should agree on an updated Data Sharing Agreement (DSA) for operational information concerning service users that includes the requirements of the current data protection regulations.	Medium	Yes	31/06/2023 (Revised date 31/03/27)	**Part Implemented.** The follow up review noted that the Council and NHS Grampian have now agreed on an Information Sharing Protocol. This is an overarching agreement that allows for the development of DSAs for individual service areas. Work is now ongoing to develop DSAs where information is shared. However, this has been a significantly greater workload commitment than initially envisaged, and a multi-year timescale is needed to implement this recommendation. As a result, it is intended that another audit review will be included in a future Audit Plan to evidence implementation.	

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No.	**Audit Recommendation**	**Priority**	**Accepted (Yes/ No)**	**Date of Completion**	**Status / Explanation**	
5.06	Contract compliance visits to care providers should include a review that appropriate systems are being followed to manage and ensure the security of service user information.	Medium	Yes	Implemented	**Implemented**. The contract monitoring checklist for external care providers was updated to include checking information management arrangements.	