Moray Council

Internal Audit Section

Social Care & CareFirst System Information Governance Review

Final Report

Moray Council

Internal Audit Section

DEPARTMENT: Education and Social Care Department

SUBJECT: Social Care & CareFirst System Information Governance Review

REPORT REF: 17'016

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1.   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 Health and Social Care Moray) and for children's services provided by the council.

This audit review is timely given the recent coming in to force of the new General Data Protection Regulation 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.

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2. Introduction

The annual Internal Audit plan for 2017/18 provides for a review to be undertaken of how information is accessed and recorded within the CareFirst System and other information databases within Education and Social Care Services. In addition the audit also reviewed the different levels of access and electronic controls used to administer the CareFirst System.

3. Audit Scope

The purpose of the audit was to undertake a review of how information is recorded and managed within the various information databases for Adult and Children Services. The audit also reviewed access and the electronic system controls operating within the CareFirst System

4. Summary Assessment

The Internal Audit Section will provide Management with an opinion on the internal control environment based on four categories of classification:

Assurance Level	System and Testing Conclusion
Full	The controls tested are being consistently applied
Substantial	There is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
Limited	The level of non-compliance puts the system objectives at risk.
None	Significant non-compliance with basic controls leaves the system open to error or abuse.

Our assessment in terms of the design of and compliance with, the system of internal controls for Social Care & CareFirst System Information Governance Review as limited by the scope of audit is set out below:

System Assessment	Testing Assessment
Substantial	Limited

5. Findings

The main issues raised for management consideration are:

5.1   No single database is used for recording all case details as information and observations may be recorded on three different recording systems i.e. CareFirst, Shared Drive and Paper Files.

5.2   CareFirst Information System is an open database where officers are able to view information but only designated officers are authorised to action a particular function e.g. to incur expenditure.

5.3   Limited evidence was found of how the Service has developed an information security management system with the purpose of minimising the risk of a data security breach.

5.4   Health and Social Care Moray has no officer representation on the Information Assurance Group. An officer from Health and Social Care Moray should attend this Group to ensure they can keep the Service regularly updated with any issues concerning information governance systems and practices.

5.5   No reporting is made to the Information Assurance Group of any breaches in information security, Highlighting any weaknesses or incidents in data security would allow these issues to be discussed and improvements suggested to minimise any possible future loss of information.

5.6   Regular reviews on a sample of case files to ensure completeness, accuracy etc. are undertaken by Children's Services and the Criminal Justice Managers. However there has been no similar co-ordinated review undertaken within Adult Services for a number of years.

5.7   The 'Summary on Case File Auditing Process' used for monitoring within Children's Services and Criminal Justice had not been issued for a number of years.

5.8   It was noted that approximately a third of all case reviews requested for review by Children's Services and Criminal Justice Managers had not been undertaken.

5.9   No clear evidence was noted between the results of auditing case files and changes and improvements in systems and practices.

5.10   The restricted case file access allows for an officer to override the access to a sensitive case file. No authorisation is required from a Team Leader before this access is allowed.

5.11   Limited evidence was noted within the exception report produced by the Services' IT Support Section detailing the reasons provided by officers to access a restricted case file.

5.12   The Service's IT Administration officers may access a restricted case file as part of their duties in managing the CareFirst System. However, this access is not recorded within the exception report provided to Managers.

5.13   Limited evidence was noted of any review undertaken by Managers regarding officers who have overridden access controls to view a restricted case file.

5.14   Sensitive or restricted information may also be held for a client on the Shared drive and paper files, however no authorisation requirement or exception report is produced of officers accessing this information.

5.15   No service instructions were noted regarding the use of mobile storage devices e.g. encrypted USB Sticks.

5.16   From discussions with various officers there was a different understanding of the circumstances where a case file within the CareFirst System may be deleted.

5.17   It was noted that IT Administration Support in accordance with the Council Retention Policy can delete Case Files within the CareFirst System without formal authorisation from a Social Care Service Manager or Team Leader.

5.18   A CareFirst File may be deleted however information regarding a Service User may still be recorded and remain within the Shared Drive or Paper File.

5.19   The CareFirst IT Administration Team will monitor details of officers who have not accessed the system, however there is no established time period after which access is automatically suspended.

5.20   A number of categories within the paper file contents index for both Adult and Children Services were found to be no longer relevant.

5.21   It was noted that the Case Recording Procedure within Adult Services has been recently reviewed, but the revised procedures are still in draft and have not been issued.

5.22   No reference is made within the Case Recording Procedure to the Information Security Policy that could assist officers to ensure good information security practices are followed.

5.23   Information Security Policy has not been reviewed since 2009

5.24   No confidentiality agreement has been signed between the Council and OLM Group, the providers of CareFirst.

5.25   Discussions with officers within the services noted variances of where information, observations, correspondences etc. should be saved. It was also found that difficulties could occur in retrieving data due to generic terms used to save information.

5.26   The Information Systems Support Team for the CareFirst System is based within the Community Care Service and not the ICT Section.

6. Recommendations

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.						
5.1	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's Services will jointly review their document management requirements with a view of upgrading to the new Care First System for the future recording of all case documents.	Commissioning & Performance Manager Head of Integrated Children's Services	31/07/2020

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.2	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
5.3	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
5.4	A representative from Health and Social Care Moray 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
5.5	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 information security to the IAG.	Commissioning & Performance Manager	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.6	Regular reviews of Case Files to ensure completeness should be undertaken by Adult Services as is currently undertaken within Children's 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 Adult Services Head of Integrated Children's Services	30/06/2018
5.7	A "Summary Report on Case File Auditing" should be undertaken on a yearly basis.	Medium	Yes	Already actioned through QAPPT and single agency processes. To be reported to Practice Governance Board.	Head of Integrated Children's Services Commissioning & Performance Manager	Implemented 31/08/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.8	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 Services	Implemented
5.9	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 Board.	Head of Integrated Children's Services Commissioning & Performance Manager	Ongoing 31/08/2018
5.10	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

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.11	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
5.12	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
5.13	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 Services	30/06/2018

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5.14	Authorisation should also be obtained from a senior manager of any access required to a restricted case file when information is stored within the Shared Drive or Paper File.	Medium	Yes	Review current process and investigate viability of new processes.	Commissioning & Performance Manager Strategy Officer	31/12/2018
5.15	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 5.3 using corporate guidance. ICS has issued recent guidance circulated from GDPR officer.	Commissioning & Performance Manager	31/12/2018

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5.16	CareFirst Case Files should be deleted in accordance with the Council Document Retention Policy. Deletion of any case files should only be actioned after authority of a senior manager within the Service is obtained.	High	Yes	Procedures in both Services include a requirement for a Senior Manager to delete a file. Any files highlighted for deletion by System Support will also require the authority of a Social Work Manager.	Commissioning & Performance Manager Head of Integrated Children's Services	30/06/2018
5.17	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 Services	30/06/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.18	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 access should require the authorisation of a Team or Service Manager.	Medium	Yes	Agreed - System Support will retain evidence of Service/ Team Manager authorisation for reinstatement of officer access to CareFirst. Review of compliance to be undertaken	Commissioning & Performance Manager Commissioning & Performance Manager	Implemented August 2018
5.19	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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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.20	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 within Children Services	Head of Community Care Head of Integrated Children's Services	31/12/18
5.21	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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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.22	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
5.23	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 Software Supplier	Information Systems Officer	30/09/2018
5.24	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 Services Commissioning & Performance Manager	31/12/2018

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No.	Audit Recommendation	Priority	Accepted (Yes/ No)	Comments	Responsible Officer	Timescale for Implementation
5.25	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 Services Commissioning & Performance Manager Joint Head of HR and ICT	31/03/2019