

AGENDA

Meeting: Audit Committee
Place: The Kennet Room - County Hall, Trowbridge BA14 8JN
Date: Tuesday 24 January 2017
Time: 2.00 pm

Please direct any enquiries on this Agenda to Becky Holloway of Democratic Services, County Hall, Trowbridge, direct line 01225 718063 or email becky.holloway@wiltshire.gov.uk

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Membership:

Cllr Richard Britton (Vice
Chairman)
Cllr Rosemary Brown
Cllr Tony Deane (Chairman)
Cllr Stewart Dobson
Cllr Mike Hewitt
Cllr George Jeans

Cllr Julian Johnson
Cllr Linda Packard
Cllr Sheila Parker
Cllr David Pollitt
Cllr James Sheppard

Non-Voting Members

Cllr Baroness Scott of Bybrook
OBE

Cllr Dick Tonge

Substitutes

Cllr Chris Caswill
Cllr Terry Chivers
Cllr Peter Evans
Cllr Nick Fogg MBE
Cllr Atiqul Hoque
Cllr David Jenkins

Cllr Jacqui Lay
Cllr Alan MacRae
Cllr Helen Osborn
Cllr Mark Packard
Cllr Ian West

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Part I

Items to be considered while the meeting is open to the public

1 **Apologies and Membership Changes**

To receive any apologies for absence and to note any membership changes.

2 **Minutes of the Previous Meeting** (*Pages 5 - 10*)

To confirm and sign the minutes of the meeting held on 26 October 2016.

3 **Declarations of Interests**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Chairman's Announcements**

To receive any announcements through the Chairman.

5 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Please contact the officer named on the front of the agenda for any further clarification.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named on the front of this agenda no later than 5pm on **Tuesday 17 January** in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on **Thursday 19 January**. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

6 **SWAP- Internal Audit Update and Quarter 3 report**

To consider a general update from SWAP and the internal audit report for Quarter 3 2016/17, report to follow.

7 KPMG Grant Certification Report 2015/16 *(Pages 11 - 18)*

To consider the Grant Certification report 2015/16.

8 Information Governance Update Report *(Pages 19 - 24)*

A report updates on the latest progress with the Information Governance Improvement Plan.

The Committee is asked to note:

- a) the significant steps that have been taken to address and rectify the findings identified by the Information Commissioner's Office (ICO) and the audit engagement with them is now complete.
- b) the continued progress to address the actions identified in the two year improvement programme, which goes beyond the ICO requirements to fully inculcate a new information governance culture and practices across the organisation, whilst ensuring compliance with statutory legislation.

9 Forward Work Programme *(Pages 25 - 28)*

To review the Forward Work Programme for the Committee.

10 Date of Next Meeting

To note that the next regular meeting of the Committee will be held on 26 April 2017.

11 Urgent Items

Any other items of business, which the Chairman agrees to consider as a matter of urgency.

Part II

Items during whose consideration it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

AUDIT

MINUTES OF THE AUDIT MEETING HELD ON 26 OCTOBER 2016 AT THE KENNET ROOM - COUNTY HALL, TROWBRIDGE BA14 8JN.

Present:

Cllr Richard Britton (Vice Chairman), Cllr Tony Deane (Chairman), Cllr Stewart Dobson, Cllr Mike Hewitt, Cllr Julian Johnson, Cllr Sheila Parker, Cllr David Pollitt, Cllr James Sheppard and Cllr Dick Tonge

Also Present:

Dr Carlton Brand, Cllr Alan MacRae and Cllr Stuart Wheeler

37 Apologies and Membership Changes

Apologies for absence were received from Cllr Rosemary Brown, Michael Hudson, Robin Townsend and Carolyn Godfrey.

38 Minutes of the Previous Meeting

Councillors considered the minutes of the previous meeting and the action assigned to the Chairman to contact maintained schools about governance. Liz Williams (Head of Finance) advised that officers would write to the Chairs of Governors and Heads of maintained schools about the Committee's concerns. It was noted that there was no evidence that governance standards at maintained schools were slipping, the information to councillors and schools was intended to pass on only general comment.

Resolved:

To confirm the minutes of the meeting held on 27 July 2016.

To note the progress of actions arising from that meeting as detailed above.

39 Declarations of Interests

There were no declarations of interests.

40 **Chairman's Announcements**

There were no Chairman's Announcements.

41 **Public Participation and Councillor's Questions**

There were no members of the public present.

42 **SWAP- Internal Audit Report- Quarter 2**

Representatives from the South West Audit Partnership (SWAP) updated on the performance of the Internal Audit for the second quarter of 2016/17 and highlighted that customer satisfaction with the audit was 90%. The status of audit actions was detailed in Appendix B, in respect of IT services the Committee was advised that the ICT Health Check report was in draft and that a Head of IT was now in post. It was noted that the Healthy Organisations improvement plan was to be progressed through the Council's Corporate Leadership Team.

The Chairman questioned the Overall Assurance Graph for Healthy Organisations and it was confirmed that further detail on where progress was being made within the various workstreams was to be included within the January report. Stylistic changes to the report were suggested, in particular that related issues in appendices B and E be cross referenced, however members were overall pleased with the quality of the report. Outstanding actions from the audit outlined in Appendix F were discussed, in response to questions about outstanding information required from the Finance team it was suggested that, although information had been submitted, it may not have reached the report in time. Officers would meet regularly to progress outstanding options and SWAP would re-issue an updated report.

Councillors commented that they would be keen to see improved linkage between the internal audit and healthy organisation, SWAP advised that overall progress was positive and they could link their Annual Plan to healthy organisations. Members discussed the impact of a recruitment freeze at the Council and retention of skilled staff, it was noted that this was addressed in the Corporate Risk Register. Following questions from Committee, it was confirmed that if a maintained school had insufficient cash flow to pay its staff, this responsibility would ultimately fall to Wiltshire Council, however this would only occur very rarely.

Resolved:

To note the progress of the Internal Audit to date.

43 **Annual Audit Letter 2015/16**

Darran Gilbert, KPMG, introduced the Annual Audit Letter which condensed the findings of the Annual Report. The Committee was advised that KPMG would remain as the Council's external auditor for two further years, and a new auditor would need to be appointed for the 2018-19 year onwards. In response to questions about audit fees, it was confirmed that the auditor could investigate additional issues beyond the original remit of the audit, however this was on an ad hoc basis and could not be planned for in advance. The results of the audit indicated that the Council was fully compliant and that the Governance Accounts and Certificate had been released by the 21 October 2016 deadline.

Resolved:

To approve the Annual Audit Letter 2015/16.

44 **Information Governance Improvement Plan**

Cllr Stuart Wheeler, Cabinet Member for Hubs, Heritage and Arts, Governance and Support Services presented a report on Information Governance. The Cabinet member highlighted that all the recommendations previously identified as requiring action within the service had either been actioned or were in progress. Key updates since the last Audit Committee included that the Information Governance team structure was now in place and had been recruited to, additionally Heads of Service (as Information Asset Owners) had received a training session on managing information held by their service.

Dr Carlton Brand stressed that the review of information held by the Council was highly complex and would be ongoing. The Council was currently reviewing hard-copy documents that it held in storage and would move to store electronic copies of documents in The Cloud. Members discussed that information security would occasionally be breached as a result of human error, however it was important that prevention and mitigation measures were in place to prevent a data breach from escalating.

The Committee expressed satisfaction in the progress made on Information Governance and the Council's response to the Information Commissioner's Office report and requested detail as to how all Council staff would be trained on Information Governance. It was explained that all staff would have to complete mandatory eLearning modules, and Councillors would also receive some IT training as part of the induction following the 2017 elections.

Resolved:

That the Committee notes:

- a) **the significant steps that have been taken to address and rectify the findings identified by the Information Commissioner's Office (ICO) and the audit engagement with them is now complete;**

- b) the continued progress to address the actions identified in the two year improvement programme, which goes beyond the ICO requirements to fully inculcate a new information governance culture and practices across the organisation, whilst ensuring compliance with statutory legislation;**
- c) that a further report will be submitted to the Committee in January 2017.**

45 **Procurement of External Audit**

The Committee was advised that, following changes in legislation the Council was required to review its processes for appointing an external auditor. The Committee was invited to consider the following options: 1- to undertake an individual auditor procurement and appointment exercise; 2- to undertake a joint audit procurement and appointing exercise with other bodies within the locality, or 3- to join a 'sector-led body' arrangement where specified appointing person status had been achieved under the relevant Regulations.

It was noted that the Council's external auditor was present at the meeting however the Chairman was satisfied that this was appropriate given that the meeting was to discuss the process of appointment only and was in open session.

In considering the options, the Committee agreed that both options 2 and 3 brought benefits, however commented it would have liked to see the options costed. The Cabinet Member for Finance responded that this was not possible as a procurement exercise would need to be undertaken. The Committee was advised that all of the options presented would ensure competitive bids from a similar pool of auditors, the options presented would affect only how the Council would be able to influence the choice of the auditor. Cllr Tonge, Cabinet member for Finance, indicated that option two, to undertake joint arrangements with other bodies, would be limited due to the preference of other bodies.

The Committee was reassured that regardless of the process in appointing an auditor it would be under the same requirements to maintain communication and a positive relationship with the Committee. Following questions, it was explained that the Council was not aware of the intentions of other authorities, however expected that most would change their arrangements and combine with other public bodies to achieve economies of scale. Councillors concluded that both options 2 and 3 had benefits however, on balance favoured option 3 in principle, subject to the conditions as detailed below.

Resolved:

To support in principle an approach by Wiltshire Council to join a 'sector led body' arrangement where specified appointing person status had been achieved under the relevant Regulations, provided that: (a) value for

money is achieved and (b) the period of appointment for auditors is specified.

46 **Forward Work Programme**

Resolved:

To note the Forward Work Plan for the Committee.

47 **Date of next meeting**

The next ordinary meeting of the Committee was to be held on 24 January 2017.

48 **Urgent Items**

There were no urgent items.

49 **Exclusion of the Public**

Resolved;

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Minute Number 50 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraphs 1 & 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public

50 **Public Service Network Update**

Dr Carlton Brand updated on the Public Service Network and a recent review of system vulnerabilities.

Resolved:

To note the verbal update provided at the meeting.

(Duration of meeting: 10.30 am - 12.55 pm)

The Officer who has produced these minutes is Libby Beale, of Democratic Services, direct line (01225) 718214, e-mail elizabeth.beale@wiltshire.gov.uk

Press enquiries to Communications, direct line (01225) 713114/713115

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Annual Report on grants and returns 2015/16

Wiltshire Council

16 January 2017



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This report is addressed to the Authority and has been prepared for the sole use of the Authority. We take no responsibility to any member of staff acting in their individual capacities, or to third parties. Public Sector Audit Appointments issued a document entitled Statement of Responsibilities of Auditors and Audited Bodies summarising where the responsibilities of auditors begin and end and what is expected from audited bodies. We draw your attention to this document which is available on Public Sector Audit Appointment's website (www.psa.co.uk).

External auditors do not act as a substitute for the audited body's own responsibility for putting in place proper arrangements to ensure that public business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

We are committed to providing you with a high quality service. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact Darren Gilbert, the engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with your response please contact the national lead partner for all of KPMG's work under our contract with Public Sector Audit Appointments Limited, Andrew Sayers (andrew.sayers@kpmg.co.uk). After this, in relation to the certification of the Housing Benefit Subsidy grant claim, if you are still dissatisfied with how your complaint has been handled you can access PSAA's complaints procedure by emailing generalenquiries@psaa.co.uk, by telephoning 020 7072 7445 or by writing to Public Sector Audit Appointments Limited, 3rd Floor, Local Government House, Smith Square, London, SW1P 3HZ.

Introduction and background

This report summarises the results of work we have carried out on the Council's 2015/16 grant claims and returns.

This includes the work we have completed under the Public Sector Audit Appointment certification arrangements, as well as the work we have completed on other grants/returns under separate engagement terms. The work completed in 2015/16 is:

- Under the Public Sector Audit Appointments arrangements we certified one claim – the Council's 2015/16 Housing Benefit Subsidy claim. This had a value of £116 million;
- Under separate assurance engagements we certified two returns as listed below:
 - Teachers' Pensions Contributions for the year ended 31 March 2016 with a value of £17 million; and
 - Pooling of Housing Capital Receipts 2015/16 with a value of £2 million.

Certification and assurance results (Pages 3-4)

Our certification work on Housing Benefit Subsidy claim included:

- agreeing standard rates, such as for allowances and benefit incomes, to the DWP Circular communicating the value of each rate for the year;
- sample testing of benefit claims to confirm that the entitlement had been correctly calculated and was supported by appropriate evidence;
- undertaking an analytical review of the claim form considering year-on-year variances and key ratios;
- confirming that the subsidy claim had been prepared using the correct benefits system version; and
- completing testing in relation to modified schemes payments, uncashed cheques and verifying the accurate completion of the claim form.

Following the completion of our work, the claim was subject to a qualification letter as a result of:

- errors identified in relation to the recording of claimant income, rent liability and claim start dates; and
- the calculation and classification of overpayments.

Our work on the other grant assurance engagements resulted in reasonable assurance reports in relation to both the Teachers' Pension Contributions and Pooling of Housing Capital Receipts returns with no issues being reported.

Adjustments were necessary to one of the Council's grants and returns as a result of our certification work this year with the overall value of the Housing Benefit Subsidy claim being reduced by £9,725.

Recommendations

We have made no recommendations to the Council from our work this year. This reflects the fact that those issues identified through our audit are not uncommon across the sector and arise from the large volume of claims being processed by the Council's benefits team throughout the year. We note that the level of errors identified is reduced from the prior year.

In addition there were no recommendations raised as a result of the previous years' work on grants and returns.

Fees (Page 5)

Our fee for certifying the Council's 2015/16 Housing Benefit Subsidy grant was £16,916, which is in line with the indicative fee set by PSAA.

Our fees for the other 'assurance' engagements were subject to agreement directly with the Council and were:

- £3,000 for the certification of the Teachers' Pensions Contributions Return; and
- £3,000 for the certification of the Pooling of Housing Capital Receipts Return.

Summary of reporting outcomes

Overall, we carried out work on three grants and returns:





- two were unqualified with no amendment;
- one required a qualification to our audit certificate.

Detailed comments are provided overleaf.

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Detailed below is a summary of the reporting outcomes from our work on the Council’s 2015/16 grants and returns, showing where either audit amendments were made as a result of our work or where we had to qualify our audit certificate or assurance report.

A qualification means that issues were identified concerning the Council’s compliance with a scheme’s requirements that could not be resolved through adjustment. In these circumstances, it is likely that the relevant grant paying body will require further information from the Council to satisfy itself that the full amounts of grant claimed are appropriate.

	Comments overleaf	Qualified	Significant adjustment	Minor adjustment	Unqualified
Public Sector Audit Appointments regime					
— Housing Benefit Subsidy	1				
Other assurance engagements					
— Teachers’ Pensions Contributions	2				
— Pooling of Housing Capital Receipts.	3				
		1	-	1	2

Summary of certification work outcomes

This table summarises the key issues behind each of the adjustments or qualifications that were identified on the previous page.

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Ref	Summary observations	Amendment
1	<p>Housing Benefit Subsidy</p> <p>As a result of our sample testing of claims we identified:</p> <ul style="list-style-type: none"> 31 errors (from a sample of 180 claims) in relation to the recording of income and rental figures. These resulted in both under and overpayments of benefits; 21 inaccuracies (from a sample of 180 claims) in relation to the identification and classification of overpayments resulting in errors in the level of subsidy being claimed; and Three instances where benefit payments had been incorrectly recorded as backdated payments where they should have been treated as standard benefit entitlement. <p>Whilst the number of errors identified may appear relatively high, representing 14% of the overall sample, the average value of the errors was only £48 per claim compared to average claim values of £1,351. No adjustments were made to the claim in relation to these errors; rather the Department for Work & Pensions will consider the results of this work and decide if any adjustment is required.</p> <p>In addition to the above we identified the following errors where the whole population could be tested and therefore an adjustment could be made:</p> <ul style="list-style-type: none"> 22 instances where non-dependent deductions had been incorrectly set at £1 when calculating the benefit entitlement; and Nine instances where expenditure had been misclassified as a result of the rent officer referral being incorrectly recorded or not received. 	(£9,725)
2	<p>Teachers' Pensions Contributions</p> <p>No issues identified as a result of out certification work</p>	No Amendment
3	<p>Pooling of Housing Capital Receipts</p> <p>No issues identified as a result of out certification work</p>	No Amendment

Fees

Our fees for the Housing Benefit Subsidy claim are set by Public Sector Audit Appointments.

Our fees for other assurance engagements on grants/returns are agreed directly with the Council.

The overall fees we charged for carrying out all our work on grants/returns in 2015/16 was £22,916.

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Public Sector Audit Appointments certification arrangements

Public Sector Audit Appointments set an indicative fee for our work on the Council’s Housing Benefit Subsidy claim in 2015/16 of £16,916. Our actual fee was the same as the indicative fee, and this compares to the 2014/15 fee for this claim of £28,220. The reduction in the fee compared to prior year is a result of the methodology used by Public Sector Appointments Limited in calculating the fee.

Grants subject to other assurance engagements

The fees for our assurance work on other returns are agreed directly with the Council. Our fees for 2015/16 were the same as those in 2014/15.

Breakdown of fees for grants and returns work

Breakdown of fee by grant/return		
	2015/16 (£)	2014/15 (£)
Housing Benefit Subsidy claim	16,916	28,220
Teachers’ Pensions Contributions	3,000	3,000
Pooling of Housing Capital Receipts	3,000	3,000
Total fee	22,916	34,220



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Wiltshire Council

Audit Committee

24 January 2017

Information Governance

Executive summary

The purpose of this report is to update the Audit Committee on progress with the information governance improvement programme.

The programme continues to address the findings identified by the Information Commissioner's Office (ICO), with key actions already having been delivered and a 2 year programme in place, identifying timescales for further improvements, which are beyond the scope of the ICO audit and will seek to provide the organisation with a robust framework for even better compliance with statutory Governance requirements.

Proposal

That the Committee notes:

- a) the significant steps that have been taken to address and rectify the findings identified by the Information Commissioner's Office (ICO) and the audit engagement with them is now complete.
- b) the continued progress to address the actions identified in the two year improvement programme, which goes beyond the ICO requirements to fully inculcate a new information governance culture and practices across the organisation, whilst ensuring compliance with statutory legislation.

Reason for proposal

Report provided for information only.

**Dr. Carlton Brand, Corporate Director
Wiltshire Council**

Information Governance

Purpose of report

1. To inform the Audit Committee of the progress of the improvement programme that has been set up to address the findings identified by the ICO.

Background

2. An information governance improvement programme has been developed to address the recommendations in the ICO's report and is based on the NHS and Local Authority Information Governance Toolkit (version 13), which is recognised as providing a comprehensive set of standards for information governance and meets with the approval of the ICO.
3. The ICO provided some constructive feedback on the action plan in April 2016 and advised that the audit engagement is now complete. It is acknowledged that whilst some of the timescales have moved from the original plan, the ICO Board felt it is important that the organisation does not have a rapid, quick fix approach to put things right; but that there is the creation of a much more sustainable framework and strategy for Information Governance across the Council.

Information Governance was and is specifically included in reports of the 27 October 2015, 26 January 2016 and 27 July 2016.

Main Considerations for the Committee

ICO Recommendations update

4. Substantial progress is being made in the areas for improvement identified in the ICO's report. The current position is as follows:

Scope area	Number of recommendations in each scope area from the original audit report	Number of actions complete, partially complete and not implemented. Last report Oct 16	Number of actions complete, partially complete and not implemented. Current Status
Records Management	31	16 Complete 15 in progress	20 Completed 11 in progress
Subject Access Requests	27	7 Complete 20 in progress	16 Completed 11 in progress
Data Sharing	16	6 Complete 10 in progress	8 Completed 8 in progress
TOTAL TOTAL COMPLETE TOTAL IN PROGRESS	74 44 (59%) - an increase of 20% of recommendations being completed within the last 4 months 30 (41%)		

5. The Information Governance Assurance Steering Group will continue to monitor Information Governance Risk for the Council, reporting into the Information Governance Programme Board. All IG risks are updated on a quarterly basis as part of the Corporate Performance and Risk report into Cabinet.

Records Management

6. The project with regard to removing paper storage from sites across the County, continues to move forward. Completion is due by the end of March and is well on target. The key timings:

Monkton Park basement – all paper storage removed week ending 13th January
Churchfields (Salisbury) – all paper storage removed by 31st January
Riverway (Trowbridge)– all paper storage removed by 31st January
Devizes – removal due to start on 15th February lasting approx 3 weeks

A total of 25,645 boxes have been removed to Iron Mountain which equates to 29,278 cubic feet of space which has been released.

7. The IM Connect portal for services to retrieve files is up and running, being well utilised by staff and Iron Mountain continue to add files to the system.
8. One of the actions to arise from the ICO audit was the need to complete a review of the council's retention schedule.
9. The retention schedule contains the council's policy for how long it keeps various types of record and what it does with them once that period of retention has expired. The existing schedule is incomplete and not particularly user friendly.
10. The IG team have now contacted all services to review their parts of the retention schedule, and have been asked to advise us of any additions or amendments that need to be made to the existing schedule or to indicate where the existing schedule remains appropriate.
11. The Information Governance Team will then use the responses we receive to create a single point of reference for the council that officers can use to ensure that records are maintained and disposed of in line with a single and consistent policy.

Information Asset Register

12. A composite Information Asset Register to record all the council's information assets has been designed, successfully piloted and was rolled out across the organisation at the beginning of October, for completion by the Information Asset Owners (Heads of Service) by the first week of December 2016. Workshops to support this were run during October and November with one to one sessions being arranged where appropriate.
13. The response rate from Heads of Service for this initial phase is 77%. There has been some significant restructuring in certain areas and this is where

the focus has been. The IG team has worked with these services to ensure that support was given to encourage completion as soon as possible and for the majority of services this has been achieved. Carlton Brand in his role as Senior Information Risk Owner for Wiltshire Council has been updated with progress.

14. Information received within the register from services will now be reviewed and assessed and Phase 2 will include extracting more detail and clarification from services to ensure the organisation is able to understand and manage its assets and the risks associated with them, in order to protect the information held and exploit its potential.

PSN

- 15 In order for the Council to exchange data securely with central government and other public sector partners remain it is necessary for it to be part of and therefore compliant with the Public Services Network requirements for information security. Compliance and approval are subject to annual review, which includes penetration testing, both on the IT system itself and physical entry into buildings
- 16 NCC Group provided a detailed 417 page report, which identified several areas of concern, for both the physical and technological elements. These issues have been ranked from critical to low. Progress has been significant since last year. The critical and high issues have decreased by 29%, with an overall decrease of 3.1%. *Please note: this is across the combined Council/Police estate.*

Main Outstanding Issues

Of the 70 medium or above issues identified in the 2016 PSN penetration test, 1 critical, 2 high and 3 medium level risks remain open but are being progressed. Detailed risk plans are in place but progress has been slow due to the availability of specialist external support resources. The restructure of IT has also had an impact.

A further 10 issues have been risk accepted by CLT: 1 high and 9 medium level risks. The medium level risks are issues where the action required to remediate the risk outweighs the potential harm from the vulnerability.

SharePoint

- 17 Together with IT and the Programme Office, IG are currently developing a team site on Sharepoint which is hoped will provide a template for team sites across the organisation. The project has fallen into two distinct phases. The first phase is focusing on developing the look and functionality of a team site. Exploring what the site needs to do for each team, the visual look and feel of the site to ensure staff engagement and considering how information can be managed and stored.
- 18 It is planned that a version of the team site will be available for the IG team in late January. There will then be a period of testing the functionality. The second phase will then focus on workflow and case management.

Communications and Training Programme

- 19 The continued success of the improvement programme remains reliant on culture change and embedding the importance of information governance across the organisation. A communications and engagement strategy is currently being drafted to underpin this and enhance the training delivered to date and in the future.
- 20 The IG team continue to deliver bespoke training to relevant service areas and will continue to promote and provide professional support and guidance across the organisation.
- 21 Work is also being undertaken to look at requirements to train the remaining staff within the organisation, potentially through an eLearning package.
- 22 The IG team are currently in discussion with Learning & Development with regard to contributing to the Councillor Induction training being provided later in the year. Focus will be around informing Councillors of their responsibility when dealing with personal and sensitive information, how to store it, how to share it and their responsibilities around security of information.

Environmental Impact

- 23 There are no environmental impact implications.

Procurement Implications

- 24 Procurement guidance has been updated to support proposed changes to the Council's Procurement Rules, which include requirements for data sharing and information security. The guidance will cover the Council's obligations in respect of information governance and seeks to ensure engagement of Information Security at the point of initiation to provide the relevant safeguards for new specifications.

Equality and Diversity Impact

- 25 There are no equality and diversity impact implications.

Risk Assessment

- 26 Failure to implement improvement actions will increase the risk of non-compliance with information legislation resulting in reputational harm, litigation, fines and costs.

Financial Implications

27 Work is being undertaken to ensure the budgetary transfers required from across the Authority which will cover the cost of the records contract with Iron Mountain.

There are no financial implications

Legal Implications

28 The measures that are being taken under the Improvement Programme will ensure that the Council meets its obligations under information legislation.

Conclusion

29 Significant steps continue to be taken and actioned to address and rectify the findings identified by the Information Commissioner's Office.

30 The IG team continues to drive both the ICO requirements and meet the demands of compiling with statutory legislation to encourage a new information governance culture across the organisation.

31 It remains key to the continuing success of the IG programme to raise the profile of IG across the organisation and to encourage both staff and managers to engage with and take responsibility for managing their information.

**Robin Townsend,
Associate Director, Corporate Function, Procurement and Programme Office**

Report Author:

Sarah Butler, Information Governance Manager

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AUDIT FORWARD PLAN

PROPOSED WORK PROGRAMME FOR THE AUDIT COMMITTEE - 2017/18

Meeting Date and Time	Name of Report	Report Author	Deadline for submission of report	Publication dates
Tuesday 24 January 2017 2pm Page 25	Q3 IA report	SWAP	10/01/2017	16/01/2017
	Grant Certification Report 2015/16	KPMG	10/01/2017	16/01/2017
	Update on Information Governance Improvement Plan	Dr Carlton Brand	10/01/2017	16/01/2017
Wednesday 26 April 2017 2pm	Q4 IA report	SWAP	11/04/17	18/04/17
	Internal Audit Plan	SWAP	11/04/17	18/04/17
	KPMG Audit Fee Letter	KPMG	11/04/17	18/04/17
	KPMG External Audit Plan	KPMG	11/04/17	18/04/17

PROPOSED WORK PROGRAMME FOR THE AUDIT COMMITTEE - 2016/17

Wednesday 26 July 2017 10:30am Page 26	IA Annual Report 16/17	SWAP	12/07/17	18/07/17
	Q1 IA report	SWAP	12/07/17	18/07/17
	Annual Governance Statement	Legal	17/07/17	18/07/17
	Report to those Charged with Governance (ISA 260) 2016/17	KPMG	12/07/17	18/07/17
	Statement of Accounts	Michael Hudson	12/07/17	18/07/17
Tuesday 31 October 2017 2pm	Q2 IA report	SWAP	17/10/17	23/10/17
	Annual audit letter	KPMG	17/10/17	23/10/17
Wednesday 24 January 2018 10:30am	Q3 IA report	SWAP	10/01/18	16/01/18
	Grant Certification Report 2016/17	KPMG	10/01/18	16/01/18

* Whether this is a full report or a brief letter will depend upon the nature and extent of any issues identified.

** The timing of these reports may be subject to change depending upon the nature of any issues found and the time taken to resolve these.

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PROPOSED WORK PROGRAMME FOR THE AUDIT COMMITTEE - 2016/17

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Legal: Ian Gibbons – Associate Director, Legal & Governance

Corporate Office: Robin Townsend – Associate Director, Corporate Function, Procurement and Programme Office