



# Information Security Checks 2019/20

## City of York Council

### Internal Audit Report

Business Unit: Corporate and Cross-Cutting  
Responsible Officer: Interim Assistant Director – Legal and Governance  
Service Manager: Information Governance and Feedback Team Manager  
Date Issued: 24 October 2019  
Status: Final  
Reference: 10260/028

	P1	P2	P3
<b>Actions</b>	0	2	0
<b>Overall Audit Opinion</b>	Reasonable Assurance		

# Summary and Overall Conclusions

## Introduction

- 1.1 Information is one of the most valuable assets held by any organisation. Good information governance is a key element of delivering high quality services. A failure to secure personal and sensitive<sup>1</sup> data can lead to data breaches under the General Data Protection Regulation (GDPR) and Data Protection Act 2018. These breaches can cause significant reputational damage as well as the potential for financial penalties up to €20 million.
- 1.2 The council holds and uses large amounts of personal and sensitive data. Senior management recognise there are information governance risks associated with holding this information and that appropriate practices need to be followed by council staff.
- 1.3 In accordance with the agreed audit plan for 2019-20, information security checks were undertaken at West Offices and Hazel Court in August 2019. The purpose of these checks is to assess the extent to which personal, sensitive and confidential data is stored securely and to ensure that data security is being given sufficient priority within council service areas.
- 1.4 Previous checks conducted in 2018-19 (West Offices in September and Hazel Court in November 2018) gave an overall opinion of Reasonable Assurance.
- 1.5 At the time of this audit (August 2019), the secure key storage system at West Offices had been in operation for almost two years and 45 teams were registered as using the system. The Hazel Court key storage system was installed in January 2018 and all the teams within the building had been allocated a key to teams at the time of this audit.

## Scope of the Audit

- 1.6 As part of this audit, the two main council offices, West Offices and Hazel Court, were visited. This was the twelfth of these information security checks since the opening of West Offices in 2013 and the council-wide implementation of a clear desk policy. The large number of non council staff who share West Offices means it is important for each service to recognise that information must be held securely within their area of the building.

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<sup>1</sup> For example data defined as special category data under data protection legislation (such as race or religious beliefs) or other sensitive data such as commercially sensitive information.



- 2.6 All individual items of information found during these checks have been rated according to the level of risk they pose if this information was accessed inappropriately, disclosed or lost. All items recorded pose some risk and action should be taken to ensure all information is kept securely. Particular attention should be paid to those rated as medium and high risk in the detailed findings in Annex 3.

### **Hazel Court**

- 2.7 Access to Hazel court buildings is controlled through perimeter security, with a security officer located on the site at all times. Staff are required to keep all cupboards locked then place the keys in a key safe. The security officer on duty checks each night if any keys have not been returned and locks cupboards that have not been locked. A log is maintained of any instance of cupboards being left unlocked and any instances logged are then reported to relevant members of staff.
- 2.8 During our visit it was found that the vast majority of cupboards were locked and those that were not locked did not contain any personal data. There was one cabinet that we found to be unlocked which contained staff sickness/medical and interview records. There were a few instances of personal data being left out on work surfaces such as appointment cards and gas safety checks that contained customer names and addresses.
- 2.9 Some work information (e.g. road safety audit results) was left unsecured but this did not contain personal data and so represents only a very low risk to the council.
- 2.10 We also identified assets that were left in an unsecure location; these included mobile phone, tablets and keys for access to gas meters.
- 2.11 A new secure key storage system is being implemented in the work room, similar to that in operation for the office areas, which will also serve the purpose of ensuring only authorised drivers can access specific vehicle keys. While the new key storage system is being installed the vehicle keys are stored within a portakabin on site. At the time of our visit the portokabin was locked, the security officer provided us with access. Inside the portakabin the key safe used to store vehicle keys was unlocked and appeared to be broken.
- 2.12 Findings from the Hazel Court information security checks are detailed in Annex 3.

### **Overall Conclusions**

- 3.1 The council remains reasonably well protected against accidental disclosure of information. The majority of information is stored in cupboards. Cupboard doors are generally closed; the majority of cupboards are locked and the clear desk policy is largely adhered to throughout both offices.

- 3.2 However, despite the implementation of the secure key storage system at West Offices (which had been in operation for around two years, at the time of the information security checks), it appears more work is required to ensure that it delivers the intended information security benefits. Guidance has been produced instructing all department line managers to arrange with security to use the secure key cabinet and this will be disseminated through directorate management teams.
- 3.3 There remain improvements to be made, particularly at West Offices, to protect against deliberate unauthorised access by ensuring all personal and sensitive information is locked away. Action is also required to ensure that confidential information (e.g. financial data) is kept securely.
- 3.4 Overall, there is currently satisfactory management of risk but a number of weaknesses were identified. An acceptable control environment is in operation but there are a number of improvements that should be made. Our opinion of the controls within the system at the time of the audit was that they provided **Reasonable Assurance**.

## **Actions**

- 4.1 Actions to address the weaknesses identified in this report are included in Annex 1 below.

**Agreed Action 1.1**

Guidance relating to the key tracker will be communicated to staff requiring all teams to use the key safe. Then escalate any service area that has not registered to use the key tracker to Corporate Management Team.

<b>Priority</b>	2
<b>Responsible Officer</b>	Total Facilities Manager
<b>Timescale</b>	31 March 2020

**Agreed Action 2.1**

Develop a process for monitoring and reporting when keys have not been returned to the key safe.

<b>Priority</b>	2
<b>Responsible Officer</b>	Total Facilities Manager
<b>Timescale</b>	31 March 2020

# Audit Opinions and Priorities for Actions

## Audit Opinions

Audit work is based on sampling transactions to test the operation of systems. It cannot guarantee the elimination of fraud or error. Our opinion is based on the risks we identify at the time of the audit.

Our overall audit opinion is based on 5 grades of opinion, as set out below.

Opinion	Assessment of internal control
High Assurance	Overall, very good management of risk. An effective control environment appears to be in operation.
Substantial Assurance	Overall, good management of risk with few weaknesses identified. An effective control environment is in operation but there is scope for further improvement in the areas identified.
Reasonable Assurance	Overall, satisfactory management of risk with a number of weaknesses identified. An acceptable control environment is in operation but there are a number of improvements that could be made.
Limited Assurance	Overall, poor management of risk with significant control weaknesses in key areas and major improvements required before an effective control environment will be in operation.
No Assurance	Overall, there is a fundamental failure in control and risks are not being effectively managed. A number of key areas require substantial improvement to protect the system from error and abuse.

## Priorities for Actions

Priority 1	A fundamental system weakness, which presents unacceptable risk to the system objectives and requires urgent attention by management.
Priority 2	A significant system weakness, whose impact or frequency presents risks to the system objectives, which needs to be addressed by management.
Priority 3	The system objectives are not exposed to significant risk, but the issue merits attention by management.

**Detailed Findings**



Annex 3- Details of findings..xlsx

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