

GLASGOW CITY COUNCIL INTERNAL AUDIT SECTION

COMMITTEE SUMMARY

Item 2(b)

17th March 2021

Title of the Audit: Corporate Review – Covid-19 Information Security Monitoring

1. Introduction

- 1.1 The Council has an Information Security Policy and employee guidance framework in place which is largely stable except for occasional iterative changes, as and when new technologies are adopted or when scope for improvement is identified.
- 1.2 Early in 2020 the Covid-19 global pandemic meant that the way that the Council worked had to be adapted at a significant pace. As a result a number of previously accepted controls had to be relaxed or removed in order to facilitate business change / continuity, e.g. the implementation of video conferencing, the use of personal devices etc.
- 1.3 The purpose of the audit was to ensure that where control amendments were brought forward for consideration alternative / compensatory controls were implemented so that an appropriate level of control was maintained, whilst accommodating the changing business environment.
- 1.4 The scope of the audit included reviewing:
- The processes in place for receiving, appraising, approving and recording technical, and non-technical, information security related control relaxation requests;
 - An assessment of the appropriateness of control changes, considering the revised working arrangements brought about by the Covid-19 pandemic;
 - A review of the compensatory controls that have been put in place and their operational effectiveness; and
 - A review of the ongoing information security monitoring arrangements in place during the Covid-19 pandemic.

2. Audit Opinion

- 2.1 Based on the audit work carried out a reasonable level of assurance can be placed on the control environment. The audit has however identified some scope for improvement in the existing arrangements and one recommendation and one service improvement which management should address.

3. Main Findings

- 3.1 We are pleased to report that key controls are in place and generally operating effectively. When changes in working arrangements were required due to the effects of lockdown, appropriate guidance, including Information Security guidance, was developed and communicated to staff. Updated guidance was communicated to staff as it became available. An existing process was in place for services to request and escalate changes to information security controls.
- 3.2 We also noted that the control change relaxations are logged and reported periodically via the Information Security Board (ISB) along with the compensatory controls put in place.
- 3.3 However we noted areas where there is scope for improvement. Although control relaxations were given due consideration, pre-approved to allow business continuity and subsequently reviewed by the ISB on a regular basis, there was no formal acceptance of these changes by the ISB.
- 3.4 We noted that the control relaxation logs could include further details in order to provide members of the ISB additional context on the risks posed.

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- 3.5 An action plan is provided at section four outlining our observations, risks and recommendations. We have made one recommendation for improvement and one service improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	0
Medium	Less critically important controls absent, not being operated as designed or could be improved.	1
Low	Lower level controls absent, not being operated as designed or could be improved.	0
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	1

- 3.6 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.7 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.8 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan

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No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Control changes have been formally approved.				
1	<p>Requests for control relaxations were given due consideration by appropriate staff members and pre-approved to allow business continuity. Subsequently these changes were submitted to the Information Security Board (ISB) and are reviewed on a regular basis, however there was no formal written record of acceptance of these changes by the ISB.</p> <p>Without formal records of acceptance of the control changes there is an increased risk that changes are made without appropriate scrutiny.</p>	<p>The ISB should ensure approval decisions are formally minuted and retrospectively note their approval of the control change relaxations already in place.</p>	Medium	<p>Response: Accepted. Control relaxations have been reported to each meeting of the ISB since April 2020. The minutes will reflect decisions and approvals.</p> <p>Officer Responsible for Implementation: Head of Information Governance and Data Protection Officer</p> <p>Timescale for Implementation: 28 February 2021</p>

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Service Improvement

No.	Observation and Findings	Service Improvement	Management Response
1	<p>We noted that the control relaxation logs could include further details in order to provide reviewers with additional context on risks posed.</p> <p>Without additional contextual information there is an increased risk that members of the ISB are not adequately able to assess the appropriate level of mitigation required.</p>	<p>The ISB should consider the inclusion of additional contextual information on the areas affected by control relaxations.</p>	<p>Response: Noted. This will be considered at the ISB in February 2021.</p> <p>Officer Responsible for Implementation: Head of Information Governance and Data Protection Officer</p> <p>Timescale for Implementation: 28 February 2021</p>