Internal Audit Report 2018/19 Plan - May 2019

APPENDIX A

Date Plan Key

AR	Original target timescales as determined by the Audit Report
Complete	Items that have benn completed
Scheduled	Items that are still scheduled within the target timescales
Late	Items that are, or are forecasted to be delived late

Audit Report Item	Categorisation	Area of Concern	Action	Responsibility	Sub Tasks	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20
1	High	Information Asset Registers																	
			1	Justin Thorne / IGG /DPA															
					Generate new IAR template and distribute for review	Complete	AR												
					DPA to review new IART to previous IAR versions			Complete											
					Update IART to include suggestions and feedback			Complete											
					Agree IAR Template format between Gavin Rosie Justin and DPA			Complete											
					Agree approval of new IART with IIGG			AR	Late										
			2	Justin Thorne / IGG /DPA															
					Review systems to obtain a full list of Services			Complete											
					Contact all Department and Service heads to obtain confirmation of the contact point for IAR competion			Complete											
					Follow up the confirmation of contact points with non returned Services				Late										
					Prepare distribution email including completeion instructions and target return date				Late										
					Distribute IAR Template to Service leads for completion				Late										
					Follow up the IAR returns to ensure full return compliance				Late										
			3	DPA															
					Assist in follow up of IAR returns to ensure full compliance by closure date			AR	AR	AR									
					Collate IARs					Scheduled									
					Review IARs on a sample basis to check adequacy						Late								
					Review IARs with Justin, Rosie and Gavin							Late							
					Re-approach IAR Service leads if IAR inacceptable						Late								
			4	DPA															
								AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR
					Prepare progress report for IIGG														
					Attend IIGG meetings														
					Present progress report to IIGG														
					Sign off 2019 IAR completion														

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2	High	IT Systems																	
			1	Gavin Muncaster / IGG /DPA				AR	AR										
					Initial Meeting between DPA and Gavin to discuss current ITS system GDPR status			Complete											
					Review of ICT issues to be addressed														
					Review of eMail use in relation to GDPR scope														
					Generate new ITS central GDPR Compliance system Register					Late									
			2	DPA				AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR
					Review ITS GDPR issues with Gavin			Complete											
					Address ITS GDPR issues in support of ITS			Complete											
					Prepare ITS GDPR Issues report for IIGG														
					Report on ITS GDPR Issues to IIGG with Gavin														
					Address IIGG feedback with ITS														
3	High	Contracts	1	DPA/Jonathan Murphy				AR											
					Initial discussion of GDP in relationship to Contracts with a value >£25K			Complete											
					Revue Contract change v letter issuance for Suppliers with Contracts and Justin			Complete											
					Contracts to supply analysis of all contracts of value<£25K in terms of Complete, issued and no progress				Late										
					Prepare Contract GDPR Compliance Letter to send to contract suppliers				Late										
					Agree Format and content with Procurement Team				Late										
					Distribute GDPR Coompliance Letter to relevant Contract suppliers				Late										
					Identify contracts requiring GDPR Compliance update				Late										
					Evaluate and Rate Risks associated with non GDPR Compliants contracts				Late										
					Produce plan to address non GDPR compliant contracts				Late										
			2	DPA				AR	AR		AR	AR	AR	AR	AR				
					Contact outstanding Contract owners to discuss compliance			Complete											
					Follow up the confirmation of contact points with non returned Services			Complete											
					Distribute GDPR Updated contracts			Complete											
					Follow up contract non returns			Complete											
					Ensure all >£25K contracts updated			Complete	Late										
			3	DPA			AR												
					Review content of under £25K contract letter			Complete											
					Confirm owner of under £25K Contract letter			Complete											
					Jonathan to update Under £25K contract letter.			Complete											
					Confirm Content of GDPR <£25K Contract Guidance with Justin and Jonathan			Complete											
					Obtain list of staff with <£25K Contract Management Responsibilities			Complete	Late										
					Follow up the confirmation of contact points with non returned Services				Late										
					Prepare relevant document to be sent to all contract management staff				Late										

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					Re-circulate GDPR compliance contract guidance to all <£25K contract management staff				Late										
			4	DPA	Request Confirmation from all <£25K Contract Management staff that variations to contracts/letters have been issued			AR	AR	Late									
					Follow up on non replies to requests for Confirmation from all <£25K Contract Management staff that variations to contracts/letters have been applied						Late								
			5	DPA	Prepare schedule for sample testing of lower value contracts			AR		AR	AR	Scheduled	AR	AR	AR	AR			
					Perform sample testing of lower value contracts								Late						
					Analyse results of sample testing of lower value contracts								Late						
					Feedback results of lower value contract analysis to relevant Contract Management staff									Late					
			6	DPA	Prepare ongoing small contract revision progress report for IIGG			AR	AR	AR	AR	Scheduled	AR	AR	Scheduled	AR		Scheduled	
					Present ongoing small contract revision progress report to IIGG			AR	AR	AR	AR	Scheduled	AR	AR	Scheduled	AR		Scheduled	
			7	DPA	Prepare guidance document for all service areas to re-iterate need to ensure they have copies of small value contracts and to store them securely		AR		Late										
					Issue guidance document for all service areas to re-iterate need to ensure they have copies of small value contracts and to store them securely		AR		Late										
			8	DPA	Prepare and priority rate missing high value contracts				Late										
					Continue to source replacement copies of missing high value contract				Late										
4	Medium	Data Protection Impact Assessments (DPIAs)		Jonathan Murphy / Debbie Downer		AR													
			1		DPA to Liaise with Jonathan and Debbie to review DPIA issue	AR			Complete										
					Undertake DPIAs for the Procurement Processes	AR													
					Undertake DPIAs for the Project Management Processes	AR			Complete										
					Undertake DPIAs for the ICT Upgrade Processes	AR													
					Requirement for Service Areas to carry out DPIAs identified and completed	AR													

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5	Medium	Oversight																	
			1	DPA			AR												
					Review GDPR reporting content being supplied to Governance Forums such as IIGG				Late										
					Review attendees at the relevant Governance Forums				Late										
					Perform Gap Analysis to determine required changes to forums structure and content					Late									
					Present recommendations to relevant forums						Late								
					Agree Governance forum changes						Late								
			2	Justin Thorne				AR											
					Review recommendations for forum structure and content change						Late	Late							
					Ensure GDPR comprehensive reporting is provided to forums							Late	Late	Late	Late	Late			
					Implement recommended and agreed changes to Governance Forums							Late							
			3	Justin Thorne				AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR
					Initial review of IIGG attendees to ensure suitable attendance, especially by Procurement and Contract Management				Scheduled										
					Ongoing review of IIGG and IGG attendance to ensure relevant attendance					Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled

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6	Medium	Core Documentation																	
			1	Justin Thorne				AR	AR	AR	AR	AR	AR						
					Update 2016 Protective Marking Policy			Complete											
					Update 2017 IWC Corporate Retention Policy				Scheduled	Scheduled	Scheduled	Scheduled							
					Cascade 2016 Protective Marketing Policy and 2017 IWC Corporate Retention Policy to all Services Stafff								Scheduled						
			2	Justin Thorne		Complete	Complete												
					Repair broken link to 2018 Data Protection Policy on councils' website	Complete	Complete												
			3	DPA			AR												
					Obtain a copy of the 2017/18 Information Management Report			Complete											
					Generate an IWC Policy table showing Policies, Versions, Dates, Owners, Authors and renewal information			Complete											
					Locate and Review all policy documents			Complete											
					Contact Policy Document Authors to request update of Policy Documents				Scheduled										
					Collate and cross reference new Policy review details in IART and Policy Management Documents				Scheduled										
					Review with Rosie and Justin, Information Management roles to determine correct post holders e.g. SIRO				Late										
					Ensure updated roles are included in the 2019/20 Policy Documents				Late										
7	Low	Overall Plan																	
			1	DPA			AR		AR	AR	AR	AR	AR	AR	AR				
					Review GDPR Compliance actions outstanding in Internal Audit Report		Complete												
					Prepare initial high level Plan of action to address outstanding actions, including ownerships and completion dates		Complete												
					Prepare in depth action Plan to address outstanding actions, including ownerships and completion dates			Complete											
					Agree acceptance of in-depth Project plan with Justin and Rosie			Complete											
					Maintain and update Project Plan as required			Complete	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	
					Present Overall GDPR Compliance Plan to IIGG for approval				Scheduled										
			2	DPA			AR	AR	AR	AR	AR	AR	AR	AR	AR				
					Present Overall GDPR Compliance Plan to IIGG for approval							Scheduled			Scheduled				
					Prepare GDPR Compliance progress report for IIGG							Scheduled			Scheduled				
					Present GDPR Compliance progress report for IIGG							Scheduled			Scheduled				

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8	Low	Record of Processing Acrtivities (ROPA)	1	DPA				AR	AR	AR									
					Obtain a copy of the ICO ROPA			Complete											
					Review ICO ROPA			Complete											
					Obtain a copy of the IoW Council ROPA			Complete											
					Compare IoW Council ROPA to ICO ROPA to ensure IoW Council ROPA meets the minimum sufficiency levels required				Scheduled										
					Address IoW Council ROPA issues				Scheduled										
					Issue updated IoW Council ROPA					Scheduled									
9	Low	Data Exchange Agreements (DEAs)	1	Vanda Niemiec		Complete													
					Ensure all redundant DEAs are removed from the Council Intranet	Complete													
10	Advisory	Strategic Risk Register	1	Justin Thorne / DPA				AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR	AR
					Add GDPR to the Strategic Risk Register			Complete											
					Manage remedial work updates as and when required				Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled	Scheduled