MIDLOTHIAN AUDIT SERVICES
INTERNAL AUDIT REPORT

Midlothian

Subject: Frameworki

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Submitted to: Audit Committee – December 2013

Date: November 2013

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EXECUTIVE SUMMARY

1   Objective of the Audit

The purpose of the audit was to provide assurance to senior management and the Audit Committee that the Council has adequate controls in place for the use of the Frameworki case management system for Adult and Community Care. Our main findings and recommendations form the basis of this report.

2   Scope of the Audit

The audit focused on internal controls relating to the following areas:

- access and access levels;
- confidentiality;
- policies and procedures;
- data quality;
- case closure;
- training; and
- audit trails.

Excluded from Scope

Our audit focused on specific aspects of Frameworki relating to Adult and Community Care. We have not examined the specific use of Frameworki by other areas of the Council. Finance functionality of Frameworki related to authorising expenditure, recording commitments and making payments was outside the scope of this audit.

3   Background

Frameworki, developed by Corelogic, is a business critical workflow case management and finance system used by various areas across the Council including Adult and Community Care, Children and Families and Criminal Justice.

Midlothian selected Frameworki in March 2008 and first launched the software in November 2008. The delivery and support of the software in Midlothian is managed by a dedicated Social Work Management Information System (SWMIS) team within Adult and Community Care led by the SWMIS Project Manager. Training for new and existing users is provided by this team with a help-desk available to provide additional support and assistance.

Frameworki is aimed at allowing case workers to record and share accurate and relevant information in a timely manner with other professionals. The design is based on the premise that if workers find the software helpful and easy to use, the data captured will be of a higher quality and therefore allows more informed judgements to be made.

Given that Frameworki contains highly sensitive personal information concerning customers, it is vital that robust security arrangements are in place to protect that information and ensure its accuracy. The system has functionality to restrict access however Management has indicated that there is a need to balance any restrictions with the potential impact this may have on clients where a social worker was not in possession of all the relevant facts of a case. Therefore, it is necessary that access and access levels are appropriately monitored and controlled and that all users have received sufficient training.

Midlothian is soon to upgrade from Frameworki to Mosaic which is also provided by Corelogic. Preparations are currently underway for upgrading to Mosaic and the expected implementation date is around quarter four 2013/14. Recommendations and issues identified in this audit are relevant and directly applicable to the Mosaic implementation. Therefore, some recommendations made in this audit have been made for Mosaic and others for both Mosaic and Frameworki.

4   Audit Conclusion and Opinion

Our audit identified that management have established a number of policies, procedures and internal controls to help manage the risk of using Frameworki. These include:

- account profiles with access rights that vary depending on the user's job role and responsibilities;
- a robust audit trail and access audits to check that the case users access are appropriate;
- an Access and Security Policy that explains Midlothian Council's approach for implementing Frameworki;
- an access agreement that sets out employee's responsibilities when using Frameworki;
- a dedicated Frameworki helpdesk available to provide swift assistance to users; and
- an effective training programme with reasonably up to date documentation available on the intranet.

The main issues identified during our review were as follows:

- the access agreement has not been signed by a large number of users;
- the access agreement could be made more robust and is not appropriate for external workers;
- improvements need to be made over the removal of access for the emergency social work service, agency staff and for the service to be informed of individuals that move post;
- the number of access audits per month should be increased as it is low compared to the total Frameworki users;
- some users were identified as having more access rights than necessary;
- policies and procedures are out of date in some places; and
- improvements can be made to the procedures for data quality and case closure.

Because a number of the issues identified have potential Data Protection risks and the Council has already received a monetary fine for non compliance we have given a high priority to resolving these Data Protection related issues.

Management have developed a number of controls to help manage the risk of using Frameworki and have met a number of the audit objectives. However, as control failings have been identified that will need to be addressed within a reasonable timescale we have rated the audit as yellow on this occasion (please see grid below).

Colour	Level of Assurance	Reason for the level of Assurance given
Blue	**Very High**	Internal Control, Governance and the Management of Risk are at a very high standard with no unacceptable residual risk existing.
Green	**High**	Internal Control, Governance and the Management of Risk are at a high standard with only marginal elements of residual risk, which are either being accepted or dealt with.

Colour	Level of Assurance	Reason for the level of Assurance given
Yellow	**Moderate**	Internal Control, Governance and the Management of Risk have displayed a mixture of little residual risk, but other elements of residual risk that are slightly above an acceptable level and need to be addressed within a reasonable timescale.
Amber	**Limited**	Internal Control, Governance and the Management of Risk are displaying a general trend of unacceptable residual risk and weaknesses must be addressed within a reasonable timescale, with management allocating appropriate resource to the issues.
Red	**Very Limited**	Internal Control, Governance and the Management of Risk are displaying key weaknesses and extensive residual risk above an acceptable level which must be addressed urgently, with management allocating appropriate resource to the issues.

We would like to take this opportunity to thank all staff involved for their time and cooperation during the course of this audit.

Frameworki Access and Training

Before access is granted to Frameworki, users must:

- attend a basic training session that will cover the core functions of Frameworki and explain the Frameworki Security and Access Policy; and
- sign a document agreeing to the terms of use of the Frameworki system.

Testing by Internal Audit identified that out of the 525 users 142 (27%) were recorded as not having attended the training while 225 (43%) had not returned the access forms.

In response to these findings Management have indicted that at the launch of Frameworki:

- a robust system was not in place to record that training had been delivered and therefore although the training may have been provided, physically records of completion were not maintained; and
- users were only required to sign the Council's generic system access forms and there has been no retrospective signing on introduction of the new Frameworki access request forms.

It was noted however that 13 new users from July 2012 to 30 April 2013 have not returned the access forms and are not recorded as having attended the core training. They would therefore not fall into the above two categories identified by management.

Risks
If there was a Data Protection breach of personal sensitive information, the Information Commissioner would undertake a review of the controls that the Council has in place to reduce such risks. They are likely to look unfavourably on any controls that are incomplete or cannot be demonstrated to be working effectively. This therefore increases the risk to the Council of a fine and / or reputational damage should a breach occur.

Rec. No.	Recommendation	Priority	Manager	Target Date
1	Users who have not signed the access agreement should be contacted and notified that their access to Frameworki/Mosaic will be disabled unless a signed access form is submitted to the SWMIS team. A deadline of four weeks should be given.	High	SWMIS Manager	31/01/2014
2	All users must be required to attend the basic training sessions provided on Framworki and records retained centrally to confirm that this has been achieved. Any user that claims they have attended a training session but this has not been centrally recorded should be asked to confirm this in writing or via email to the SWMIS team.	Medium	SWMIS Manager	31/01/2014

Frameworki Access Request Forms

A number of concerns were noted with the current Frameworki access request forms:

- the access agreement is not appropriate for external workers (for example: it does not require the employing organisation to be noted on the form; require the individual to immediately notify the Council when their access is no longer required; and the current form makes reference to disciplinary action by the Council where they are not the employing authority); and
- the current access agreement has a number of omissions for Midlothian Council staff for example: the requirement to disclose any relatives so the worker's access to those records can be restricted; that the user accepts responsibility for information breaches made personally by them as a result of their access to Frameworki/Mosaic; and that misuse of Frameworki/Mosaic could be regarded as a criminal offence under section 55 of the Data Protection Act where the user could potentially be liable to a £5,000 penalty.

We also noted that an external worker had been granted access to Frameworki but there was no information sharing agreement in place with the organisation.

Risk

Management have indicated that the number of external users is not high and therefore believe that the likelihood of any breach is low. Nevertheless it is important for Midlothian Council to have contracts in place with any third party with which it shares information. The contracts and Frameworki access request forms need to fully define the consequences to third parties of any misuse of Council data.

The Council should provide the opportunity for staff to disclose any relationships and to fully understand the consequences of any misuse.

Were there to be any breaches of information the Information Commissioner would review the strength of internal controls within the Council and are likely to fine where these are not fully robust.

Rec. No.	Recommendation	Priority	Manager	Target Date
3	There should be two separate access agreement forms; one for external workers and one for Midlothian employees.	Medium	SWMIS Manager	31/01/2014
4	The external worker form should state that details of any misuse will be forwarded to the line manager of their employer and that their access will be immediately revoked. Also, it should require the user to disclose the organisation they are employed by and to inform Midlothian when their access is no longer required	Medium	SWMIS Manager	31/01/2014
5	Access agreements for external workers and Midlothian employees should be expanded to include all those requirements noted above.	Medium	SWMIS Manager	31/01/2014

Rec. No.	Recommendation	Priority	Manager	Target Date
6	All external workers should sign the redrafted external workers access agreement.	Medium	SWMIS Manager	31/01/2014
7	External workers granted access to Frameworki from organisations that are not part of the Lothian and Borders Partnership General Protocol for Sharing Information should be examined to determine if there is a need to establish a separate information sharing agreement with that organisation.	High	SWMIS Manager / Head of Adult and Community Care	31/01/2014

Removal of Access Rights – Midlothian Council Employees

A review of access controls to the Frameworki system identified the following concerns:

- the current policy in place as outlined in Frameworki's Security and Access Policy is to disable accounts that are unused for thirty days. At the time of the audit this had not been applied in approximately the past three months and the user list reviewed included 117 accounts that had not accessed Frameworki in the past 30 days. The risk of a leaver obtaining unauthorised access is low as a Frameworki account requires a live active-directory account (a Midlothian PC user account) and procedures are in place for Corporate IT to disable the accounts of leavers using information from HR;
- there is a risk that a Frameworki user can move post and the SWMIS team will not be informed of this. This could mean that a user will change to a job that does not require Frameworki, or requires Frameworki at a lower access level, and the user's access is not disabled or appropriately amended; and
- additionally, there is a risk that for agency workers line managers may not inform Corporate IT timeously of the workers leaving date. This means that the active directory account will not be disabled promptly after the worker leaves so unauthorised access could be given if the worker has shared their Frameworki password.

Corporate IT has a policy of disabling active directory accounts 21 days after the expected leaving date of the agency worker. But if the agency worker leaves before the expected date the control is not effective.

Corporate IT has created a New Starts and Leavers Workgroup. This workgroup provides reports on starters, leavers and movers allowing system administrators to identify post changes and leavers so access can be promptly amended or disabled as necessary. The SWMIS manager is currently not a part of this group and does not receive updates on new starts, leavers or movers.

<u>Risks</u>
Staff may view accounts that they are not authorised to view and the Council could be criticised and or fined for not having in place robust controls to limit access to authorised users.

Rec. No.	Recommendation	Priority	Manager	Target Date
8	SWMIS team members should be part of the New Starts and Leavers Workgroup. This will allow the SWMIS manager to periodically disable accounts of leavers, revise access privileges and check for post changes for those users.	Medium	SWMIS Manager	31/01/2014
9	Line managers with access to Frameworki must be reminded of their duty to inform Corporate IT and the Frameworki team of the leaver date of agency (non-payroll) staff. This responsibility should be set out in the revised Access and Security Policy.	Medium	SWMIS Manager	31/01/2014

Control of External Workers

Midlothian Council uses the Emergency Social Work Service (ESWS) provided by Edinburgh City Council. In order to carry out this service, ESWS workers require access to Frameworki.

Each ESWS worker is assigned an individual login to Frameworki and to Citrix so the worker can access Frameworki remotely through Edinburgh City Council's network from specific Edinburgh PCs with Citrix installed. There is a separate authorisation form for granting remote access and this agreement outlines the conditions under which the access for this has been granted.

Currently the SWMIS Team is not receiving updates of changes to ESWS staff. At the time of the audit there were 63 active ESWS accounts, but only 18 of these had logged into Frameworki in the past month and 26 in the past 4 months. 3 ESWS accounts have been active since 2009 but the user has never logged into the system. There are 34 active ESWS accounts where the user has never logged into Frameworki.

In response to this issue Corporate IT have developed a report that will provide a list of all ESWS workers with access to Frameworki. With this developed the SWMIS team will be able to periodically run this report and liaise with the nominated Edinburgh Social Work Manager to verify that these users still require access.

Risks
Midlothian Council is not adequately controlling external access to Frameworki and therefore may incur fines and or suffer reputational damage should there be a data protection breach.

Rec. No.	Recommendation	Priority	Manager	Target Date
10	The SWMIS team should use the ESWS report to periodically confirm the ESWS users who still require access with the Edinburgh Social Work Manager. Appropriate action should be taken thereafter to remove the access of users as required.	High	SWMIS Manager	31/01/2014

Appropriateness of Access Levels

When Frameworki was launched, permissions of different workers were outlined in an 'access grid' and this was authorised by Heads of Service with users that make use of Frameworki. The Frameworki Security and Access Policy specifies that future minor changes and amendments will be signed off by the relevant Head of Service. In general, the principles of the access grid have been applied and role profiles have been set that vary depending on the user's job role and responsibilities. All users are given unique user accounts. There is only one 'generic' user account in Frameworki and this is only used by the SWMIS manager, the system administrator and the software provider, Corelogic.

It was noted that the 'access grid' has not been updated since 08/04/2010. The grid currently reflects an older Council structure and does not include the level of access given to some employees that make use of Frameworki such as Revenues and the Contact Centre. Also, although Frameworki allows for list view, view, and view with amend levels of access the grid has not gone into this level of detail. Some workers were identified as having more access than is necessary for their role and details of these have been forwarded to the SWMIS team.

Risk
Access to Frameworki is not adequately controlled and therefore Midlothian Council may incur fines and or suffer reputational damage should there be a data protection breach.

Rec. No.	Recommendation	Priority	Manager	Target Date
11	For the Mosaic implementation a more detailed access grid should be developed and maintained by the SWMIS team. This should include more role profiles than the previous grid and whether the access granted is list view, view, or view with amend. The grid should be kept up to date with changes to roles and the Council structure.	Medium	SWMIS Manager	30/11/2014

Rec. No.	Recommendation	Priority	Manager	Target Date
12	The SWMIS team should review the role profiles identified by Internal Audit as having more access than necessary and make appropriate amendments.	Medium	SWMIS Manager	31/01/2014

Access Audits

A system is in place where 5 random Frameworki users per month will have 2 days of their access log checked by their team leader / manager. This is to confirm that the records accessed by the employee are appropriate. Although this is a good control, the number of cases reviewed seems low when compared to the number of users with access to Frameworki (525). Additionally, there is currently no procedure in place to check the access / system changes of users with 'super-user' accounts.

Risk
Sample checks may not be regarded as sufficient to detect misuse of Frameworki and Midlothian Council may incur fines and or suffer reputational damage should there be a data protection breach.

Rec. No.	Recommendation	Priority	Manager	Target Date
13	Increase the number of users to be included in the monthly access audit. Ensure that the sample regularly includes ESWS and team leaders given these users have a high level of access. Basic guidance should be issued to Team Leaders for carrying out Access Audits. Management Comment The costs and benefits of increasing sample sizes will be reviewed and increased if appropriate following this exercise.	Medium	Performance and Information Systems Manager / SWMIS Manager	31/01/2014
14	Management should review the feasibility of introducing a spot check on Frameworki/Mosaic users with super-user accounts (e.g. the SWMIS Manager).	Medium	Head of Adult and Community Care / Performance and Information Systems Manager	31/01/2014

Confidentiality

System Prompts
Frameworki contains highly sensitive personal information. Therefore it is essential that Midlothian Council establishes security arrangements to protect client confidentiality. All employees are required to complete the Information Management MILO course and be briefed in Midlothian's IT Acceptable Use Policy. There are however currently no system prompts within Frameworki to remind users of the importance of data confidentiality. The web-page confidentiality prompt currently in place can be easily by-passed by users.

Rec. No.	Recommendation	Priority	Manager	Target Date
15	Management should investigate the possibility of incorporating a system prompt within Mosaic to highlight the importance of confidentiality.	Low	SWMIS Manager	31/01/2014

Policies and Procedures

The Frameworki Access and Security Policy outlines basic guidance on the use of Frameworki and when issued were robust and comprehensive. However, the policy has not been updated since 15/06/2010. Therefore, there are areas of the policy that do not reflect current practice.

Risk
The Information Commissioner in their audit of Midlothian Council highlighted the need to review and keep up to date all relevant policies and procedures. Midlothian Council may incur fines and or suffer reputational damage should there be a data protection breach and this recommendation was found not to be adopted.

Rec. No.	Recommendation	Priority	Manager	Target Date
16	The Access and Security Policy should be refreshed for the Mosaic implementation. An annual review date and document ownership should be specified for this policy. All documents relevant to the Access and Security Policy (such as the 'access grid') should be made available on the intranet.	Medium	SWMIS Manager	31/01/2014

Data Quality

Referrals
We sought to establish if data quality checks were being performed at the initial referral stage when data is input to Frameworki. Data quality checks are carried out by contact centre team leaders, though the process was informal and there was not a record of the cases checked.

Risk
Were there to be a data breach the Information commissioner would review the strength of the internal control environment. One of the key controls would be the level and quality of monitoring over the accuracy of the data held. If it was not possible to prove that these checks were occurring fines would be more likely.

Rec. No.	Recommendation	Priority	Manager	Target Date
17	Record keeping of the quality assurance process for referrals should be improved and the process formalised.	High	Contact Centre Manager	31/01/2014

Data Quality Policy and Action Plan
A data quality policy is on the Social Work intranet; however, it has not been updated since 23/03/09 and is currently not used by the Performance and Information Systems Team. The action plan included various exception reports and data matches that would be periodically run by the Performance and Information Systems Team in order to ensure the integrity of data in Frameworki.

Risk
The Information Commissioner in their audit of Midlothian Council highlighted the need to review and keep up to date all relevant policies and procedures. Midlothian Council may incur fines and or suffer reputational damage should there be a data protection breach and this recommendation was found not to be adopted.

Rec. No.	Recommendation	Priority	Manager	Target Date
18	The data quality policy should be revisited and updated. Appropriate data matches and exception reports should be developed to assist in ensuring the accuracy of information held in Frameworki.	Medium	Performance and Information Systems Manager / SWMIS Manager	31/01/2014
19	As per the recent Information Commissioner's audit report, KPIs related to data quality and access audits should be reported to the relevant Divisional Information Management Group.	Medium	Performance and Information Systems Manager / SWMIS Manager	31/01/2014

Case Closure

End Involvement

Policies and procedures are in place for case closure and training on this is provided by the Frameworki Helpdesk. Based on observational testing the guidance appeared to be adequately followed by Administration employees, but it was identified that sometimes social work staff may update the client's status as deceased in Frameworki, but not select the option within Frameworki to inform Administration of this. An exception report was run to identify cases where the client is in Frameworki as deceased but the case status is open. 8 cases were identified as being open when they should have been closed due to the individual being deceased. One of the cases identified by Internal Audit was for a care home that Midlothian Council was still making payments to 6 months after the individual died. This

has since been rectified and the amount overpaid of £6,366 has been deducted from the June payment run from the care provider.

Risk
Fines are more likely where data is not kept fully up to date on Frameworki. Additionally, there is a risk that care packages may be overpaid in error.

Rec. No.	Recommendation	Priority	Manager	Target Date
20	Exception reporting around case closure should be introduced and sent to the Local Administrator to ensure anomalies such as the above are promptly identified and corrected.	Medium	Performance and Information Systems Manager / SWMIS Manager	31/01/2014

Adaptations
We reviewed the audit trail of how adaptations are recorded in Frameworki. We found that for major adaptations (>£500 in value) there was a full audit trail, but for minor adaptations (<£500) the process was recorded as complete as soon as the task was passed to the building maintenance department.

Rec. No.	Recommendation	Priority	Manager	Target Date
21	Sample of minor adaptations (approximately 15%) should be checked to confirm that the adaptation has actually been delivered.	Low	Fieldwork Group Manager Community Care / SWMIS Manager	31/01/2014

Training

Training is provided by the SWMIS team and a record is maintained of users that have received training on the Frameworki case management system. Training records for Community Care are reasonably up to date and an exercise is currently underway to rationalise and improve the training that is currently available.

Rec. No.	Recommendation	Priority	Manager	Target Date
22	Consider matching training courses to role profiles in Frameworki/Mosaic so the individual training needs of different users can be tracked more effectively.	Low	SWMIS Manager	31/01/2014

Audit Trail

An adequate audit trail of client records exists within Frameworki. Frameworki provides a clear single source of information for users from referral to closure of client cases.