

### **Internal Audit progress report – September 2017**

The purpose of this report is to advise the Audit Committee of our progress since the last update in June 2017.

#### **Reviews completed**

##### GDPR Review

The review of the GDPR project was completed in June. The overall assessment was Green and whilst there were some opportunities to improve, the programme of work was well controlled, utilising existing governance and management structures. There was one medium finding, which related to establishing a plan that includes significant milestones for each of the workstreams.

#### **Progress to date**

Planning meetings have been held for the IT Procurement and IT Supplier Management reviews. The IT Procurement review has been scheduled for the end of September, and the IT Supplier Management for early December (specific dates are to be agreed in early September). Scheduling has been agreed for the Corporate Governance review which will take place in October.

The follow up to GDPR is now scheduled for Q4 to allow sufficient time for actions from reviews in 2016-17 to be implemented. Specific timing is to be agreed with management shortly.

The proposed review of Fee Forecasting has been deferred at the request of Management following delays in the development of the regulations.

We have also had an initial meeting with the Head of Finance to plan an additional review on the ICO expenses process. The review will take place as soon as possible, subject to identifying resources. It will use time originally allocated to the Fee Forecasting review.



## Overall summary of plan progress

Review	Scope	Timing	Days	Progress	Audit Committee report date
Data Protection Law Reform follow up	The follow up the project review from 2016-17 and will include the follow up to the People Strategy review carried out by Internal Audit in 2016. It will establish that the findings have been actioned and that the project overall is on track to deliver the outcomes each workstream is required to deliver. Focus will be on the People Strategy and how the capacity and capability risks are being managed.	Q4	10	To be planned	March
Corporate Governance	Internal Audit has not reviewed the ICO corporate governance arrangements in the last four years. The review will cover how corporate governance arrangements have changed for 2017-18 (including risk management) and incorporated the changes to the organisation. The ICO has established a new senior leadership team and the Information Commissioner started in July 2016. The review will compare new governance and organisation structures to best practice.	October	14	To be planned	January
Fee Forecasting *	Should the ICO establish a revised income through a new Registration Fees model and potentially other sources of income, the ICO may be able to plan more strategically and hence deliver more services (such as investigations, education programmes, audits). The audit will establish how the ICO established what the income should be from fees and incorporate the process to chase outstanding fee payment.			Deferred	-
IT Procurement	ICO will be involved in more procurement of IT products and services as the strategy is to take more responsibility for IT services. The review will establish the approach to procuring IT services and establish that the ICO will be able to go to market making use of existing government procurement frameworks where appropriate and ensure that those frameworks represent value for money.	September	9	Planning commenced	January
IT supplier Contract Management	The ICO currently has one main IT services contract with Northgate and a number of smaller or specialist suppliers. While there is formality over the Northgate contract management the level of formal management over the smaller value contacts may be insufficient. The review will establish whether sufficient controls are in place for smaller contracts.	December	8	Planning commenced	January
Expenses **	Following changes made by HMRC, the ICO no longer can apply for dispensation. The review is to establish that the ICO's expenses policy is being appropriately applied and that the controls operate to enforce the policy.	September tbc	5-7	Planning started	January
Follow Up	Review of the arrangements to capture and implement audit recommendations in a timely manner.	Q4	3.5	Yet to start	March

\* Deferred

\*\* Additional review



# Grant Thornton

An instinct for growth™

**[www.grant-thornton.co.uk](http://www.grant-thornton.co.uk)**

© 2017 Grant Thornton UK LLP. All rights reserved.

Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions. Please see [grant-thornton.co.uk](http://grant-thornton.co.uk) for further details

This publication has been prepared only as a guide. No responsibility can be accepted by us for loss occasioned to any person acting or refraining from acting as a result of any material in this publication.