

Donegal County Council Internal Audit Department



DONEGAL COUNTY COUNCIL IA21/01 Remote Working and I.S. Response 2020

FINAL AUDIT REPORT

August, 2021

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1. Executive Summary

The Coronavirus pandemic which the world experienced in 2020 impacted all Irish citizens and had an unprecedented effect on how people went about their daily lives including work practices.

Local Authorities were also affected, with new protocols and working arrangements being put in place to ensure the health and wellbeing of staff and the general public. Measures such as remote working brought new work practices into consideration and presented a number of challenges for both managers and staff to ensure that vital functions as well as day-to-day operations were not severely impacted.

A survey conducted by the Local Government Management Agency in May 2020 found that the primary challenges faced by the Local Government sector in the wake of the first set of Covid-19 restrictions related to managing internal services. The survey found that 18% of these challenges related to managing I.T. services.

This audit focused on how new work arrangements were implemented in Donegal County Council. It also assessed the various challenges involved in providing I.T. access to staff working remotely and the security implications of facilitating same. This audit also looked at how these various issues were dealt with by the Information Systems (I.S.) Section and Donegal County Council management.

Several issues were raised in relation to the challenges involved in accommodating remote working for staff and the I.T. implications in relation to same with the primary issues being:

1. Insufficient clarity on staff grades approved for remote working
2. Insufficient resources in the I.S. Section to cope with the extra demands remote working entailed

Cybersecurity was another area highlighted as part of the audit. This area has become an integral part of the work environment in the public sector in recent years; with the recent cyber attack on the HSE highlighting how vital this area is in the day to day operations of an organisation.

During the course of this audit Internal Audit attempted to gain a better understanding of how staff were affected by remote working during the work restrictions implemented in 2020. A questionnaire was sent to each Director of Service for circulation amongst the Line Managers in their area. It should be noted that no responses were received in relation to this questionnaire.

The draft audit was circulated to relevant managers and staff on 16th July, 2021. Any responses and comments received have been incorporated in the completion of this report. Internal Audit's findings and recommendations for remedial action, where applicable, are included herein.

2. Assurance Rating

This audit has been assigned an assurance rating of:

Level 3 – Limited

See **Appendix 2** for Classification of Audit Assurance.

Based on the work carried out in this audit, Internal Audit found that there is a limited system of risk management, control, and governance in place in relation to Remote Working and its impact on I.S. supports and resources. There are also a number of risks to be considered in relation to cyber security by having increased numbers of staff working remotely.

It is evident that processes and controls were not applied consistently across the organisation during the lockdown periods implemented in 2020. It is acknowledged that the majority of issues occurred as a result of the unprecedented scale and effect of the Covid-19 pandemic. However, a prompt, proactive response from Senior Management is required in order to provide clear long-term guidance and strategy for future emergency events of this magnitude as well as changing work processes in relation to remote working.

An in-depth analysis of Information Systems resources is also required to ensure that resources are in place to improve cyber security within the organisation and ensure that the effects of any potential cyber attacks are negated.

Internal Audit Comment (Feb'22)

Internal Audit has been informed that there have been measures implemented to improve the controls in place in relation to cyber security and data protection. These measures include increased staff resources and implementation of new security measures.

Internal Audit will continue to liaise with the Information Systems Section in relation to this area and will review same on a regular basis.

3. Introduction and Scope

With new legislation and guidance being put in place by various bodies such as the Irish Government, the Health Service Executive and the Local Government Management Agency in the wake of lockdown restrictions, Local Authorities implemented new protocols in relation to staff health and welfare. These measures were put in place to ensure the wellbeing of its staff and adherence to new social distancing measures.

IA21/01 Remote Working and I.S. Response 2020

These new work arrangements included:

- Reduced numbers in the workplace
- Alternative working hours
- Remote working arrangements for staff

These new business practices called for the redesign of business processes and ensuring resources were allocated to key work areas.

As part of these protocols, there was a large increase in the number of Donegal County Council staff working remotely, some for the first time. The remote working arrangements for staff meant increased numbers of staff working from home in order to limit their contact with both fellow staff members and the general public.

In response to these measures the Information Systems (I.S.) section of DCC implemented new procedures and systems which involved enhanced I.T. services to support staff working remotely whilst also ensuring online service provision was supported.

The new work practices presented a number of issues in relation to how staff access Donegal County Council's I.T. network and I.S. also had to be mindful of the cybersecurity risks involved in these new processes.

The scope of this audit was as follows:

- Research relevant Legislation regarding remote working arrangements
- Assess the provision and management of remote working arrangements within Donegal County Council
- Assess the oversight and management of staff access to network systems
- Analysis of cyber and data security measures implemented in relation to remote working arrangements
- Verification of compliance with Local Authority and Government guidance in relation to cyber security and remote working arrangements

4. Audit Objectives

The main objectives of this audit were to:

- Assess Donegal County Council's provision of remote working arrangements for staff in 2020
- Assess the provision and management of I.T. access provided to staff working remotely
- Highlight any potential issues in relation to remote working
- Ascertain the cyber security implications of remote working and the Information Systems section's response to same during the same period

5. Methodology

The audit was approached as follows:

- The relevant legislation and policies & procedures were assessed
- Donegal County Council's response to alternative work arrangements under Covid-19 protocols was reviewed
- The timeline for implementing new work arrangements was analysed
- The methodology for providing staff with remote working access to network systems was reviewed
- The cyber security protocols and systems employed in remote working were assessed
- Other potential risk areas were identified
- Discussions were held with relevant staff members to identify other areas for inclusion

Note: Due to the current restrictions imposed under Covid-19 protocols, meetings and interviews with relevant persons were carried out remotely and social distancing guidelines were observed at all times throughout this audit.

6. Relevant Legislation, Guidance and Circulars

Throughout 2020 and 2021 a large volume of Legislation and Procedural documents were produced at both a national and sectoral level in response to Covid-19 protocols.

- COVID-19 FAQs for H.R. in the Public and Civil Service – Department of Public Expenditure & Reform
- Donegal County Council Influenza Pandemic Business Continuity Plan
- "Protecting Personal Data when Working Remotely" – Data Protection Commission
- Health & Safety Guidance – City and County Managers Association
- COVID-19 Protocols and Procedures – Human Resources Section, Donegal County Council
- Donegal County Council COVID-19 Policy Statement
- Guidance and FAQs for Public Service Employers during COVID-19 – Department of Public Expenditure & Reform
- Donegal County Council Safe Operating Guidance for Working from Home
- 'Making Remote Work' – National Remote Working Strategy – Government of Ireland, 2021

It should be noted that this is not a comprehensive list of all the legislation and guidance documents issued in relation to Covid-19 during 2020. The most appropriate documentation in relation to remote working has been included.

7. Policy & Procedures

Following the announcement of various restrictions in relation to social distancing in March 2021, Donegal County Council's Senior Management Team prepared a Business Continuity Plan and met on a regular basis to discuss the situation as it developed.

Staff were advised of changes in work arrangements and protocols through various means including circulars which were emailed to all staff members or announcements on the Covid-19 Updates folder on the staff intranet.

7.1 Guidance Information

A number of guidance documents were issued by various bodies in response to the changing work environment in Local Authorities as a result of the Coronavirus.

7.1.1 Department of Public Expenditure and Reform – Covid-19 FAQs for HR in the Civil and Public Service

This document was issued on 4th March 2020 and dealt primarily with staff welfare and leave in the Public Service in the wake of the Covid-19 outbreak. The document recommended home working should be approved where appropriate and that special leave be granted as necessary to staff that did not have the facility to work from home.

7.1.2 Donegal County Council Business Continuity Plan

This document was circulated by the H.R. Section of Donegal County Council on 9th March 2020; it outlined the Council's response to the Coronavirus pandemic and the emerging risks to staff and the wider community.

In order to ensure continued delivery of services and to counteract any potential disruptions, the following objectives were identified:

- Ensuring the organisation has systems in place to enable it to follow and implement expert advice
- Making sure that the organisation continues to meet health and safety responsibilities in relation to its employees
- Identifying essential functions, posts, and individuals whose absence from work would place the delivery of certain services at a particular risk
- Putting measures in place to maintain core service activities for several weeks in the event of high levels of staff absenteeism
- Identifying services that could be curtailed or closed during all or most intense periods of the pandemic
- Identifying key suppliers/contractors and putting arrangements in place to continue the provision of goods and services

- Ensuring that the other critical response plans (e.g. the Major Emergency Plan) are informed of any changes and/or limitations arising from the implementation of the Business Continuity Plan and that any changes/limitations are communicated as necessary to other principle response agencies
- Ensuring that there is a systematic approach to decision making in the organisation in relation to the COVID-19 contingency implementation and that there is an organisational understanding that decisions will be communicated across the organisation at the appropriate times, so as to avoid a sporadic approach to contingencies
- Considering how the delivery of services might be different during a pandemic

Staff welfare and avoiding the spread of the virus in the wider community was also a key element of the document which committed to:

- Take all reasonable steps to make sure employees that are ill or think they are ill are encouraged to stay at home in accordance with national policy
- Ensure that all employees are aware of any official advice on how to reduce the risk of infection during the pandemic
- Ensure that adequate hygiene facilities are available (e.g. hand washing, hand cleansers etc.)

This document also identified the need to limit face-to-face interactions between staff members, the general public, public representatives, and Council Management. The contingency plan identified the key role I.S. would play in relation to providing remote access to staff stating:

"Information services will have a critical role to play in the provision of technical infrastructure to support tele-working and remote customer interaction. Facilities for tele-working should be increased where possible within operational and security constraints. Improvements to remote access IT Systems to enable staff to work from home and the development of infrastructure to interact with customers remotely, by telephone, e-mail and/or web are elements which can assist in limiting exposure to infection".

7.1.3 Donegal County Council Chief Executive Memorandum

Following on from the Business Continuity Plan, a Memorandum from the Chief Executive of Donegal County Council was circulated to all staff on 19th March, 2020. This memo gave further updates on the National response to the crisis and also provided staff with more detail on key work areas in the short term:

- Details on council facilities which were still open to the public as well as facilities such as playgrounds and libraries which were to be closed immediately

- New workplace arrangements – details on hygiene protocols, social distancing measures and a reduction in staff numbers to ensure social distancing measures were adhered to
- Alternative working arrangements – details on staff that were eligible to work from home and the criteria involved in same, more flexible staff working hours and special arrangements for staff in relation to care requirements
- Staff redeployment – informing staff of possible redeployment as the current situation progresses

7.1.4 LGMA Health & Safety Guidance

The Local Government Management Agency released a Health & Safety Guidance document in May 2020 which outlined further guidelines to Local Authorities in relation to the ongoing Coronavirus situation. This document contained further information in limiting the spread of the virus as well as guidance in relation to working arrangements and the reopening of offices to both staff and the public.

This guidance stated that a combination of office working, remote working, extended working hours and weekend working arrangements should be explored in order to get offices reopened on a phased basis.

It also recommended that meetings should be conducted on a remote basis and returning or new staff should complete a “return to work” form in advance of their resuming office duties. Both of these suggestions were implemented by DCC.

7.1.5 Department of Enterprise Trade and Employment Guidance for Working Remotely

In July 2020 the Department of Enterprise Trade and Employment held a Public Consultation on Remote Work Guidance for both employers and employees. This consultation focused on a number of themes for remote working including: Health & Safety, Data Protection and Cybersecurity. In response to the results of the consultation, the Department published guidance on remote working which acts as a live resource for employers and employees adopting remote working practices.

The guidance deals with a number of key areas in relation to remote working including:

- Employer responsibilities
- Health and Safety
- Returning to work
- Insurance and liability
- Employment conditions
- Training and additional supports

It is envisaged that this guidance will act as a live resource for employers and employees adopting remote working practices.

As such, it will be updated as new guidance is developed to support workers and businesses, both in response to Covid-19 and in the longer-term.

7.2 New Work Arrangements for Staff

Following the issue of the Business Continuity Plan and the Chief Executive Memorandum in March 2020, a number of different measures were made available to Donegal County Council staff to ensure adherence to social distancing measures and ensure the health and wellbeing of staff. The main options that were implemented were:

- Alternative working hours (typically 6 a.m.–2 p.m. and 2 p.m.–10 p.m.)
- Spreading work patterns over the course of a seven-day working week
- Remote or home working

In order to implement these measures in a section a number of different criteria had to be fulfilled and several issues taken into account including:

- Differing staff work patterns
- Offering flexibility to staff whilst ensuring services remain intact
- Ensuring staff continued to be managed in terms of work output
- Ensuring that working hours were continued to be recorded on the Core time and attendance system

Special Leave consideration was also taken into account for staff with health issues or who had caring responsibilities for family members with special requirements. Any requests for leave of this nature were dealt with on a case by case basis by their Line Manager and/or Staff Welfare Officer.

7.3 Information Systems Processes

Prior to March 2020, |

| had remote access privileges to the DCC network. These staff members all used the Cisco AnyConnect VPN without multi-factor authentication.

After the outbreak of the pandemic I.S. liaised with the Finance Directorate on 12th March 2020 and identified staff performing critical functions which were necessary for day to day financial operations such as payroll and accounts payable. The following week, further critical staff were identified in finance along with staff in the Timesheet Processing Unit, Human Resources and Customer Contact Centre.

These staff members were configured with Cisco AnyConnect VPN (no multi-factor authentication) for remote access to systems.

On the week commencing March 23rd, Information Systems staff members were configured with Cisco AnyConnect VPN (no multi-factor authentication) for remote access, the following week 'Citrix Gateway' solution was implemented with multi-factor authentication enabled (Microsoft Authenticator app) allowing users to access the DCC network.

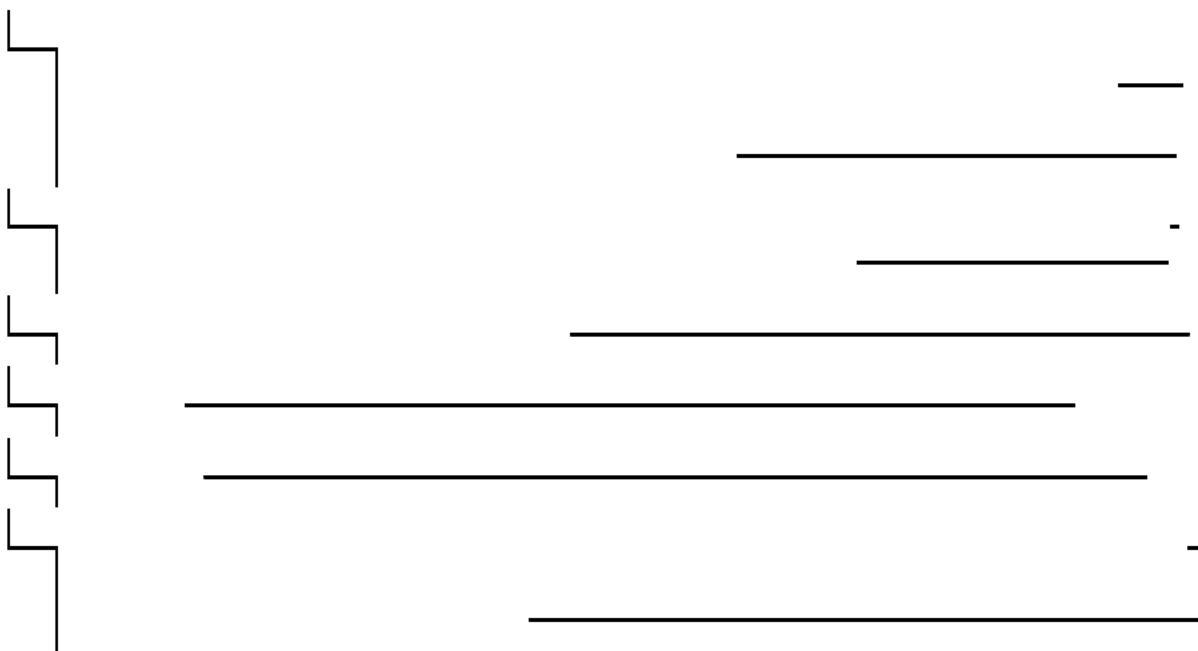
In May, I.S. implemented Cisco Duo multi-factor authentication solution that integrated with the Cisco AnyConnect VPN solution. This Adaptive Multi-Factor Authentication (MFA) reduces the risk of a data breach and also verifies users' identities. This was subsequently rolled out to all VPN users. On July 9th, I.S. carried out a report on staff currently availing of remote working arrangements.

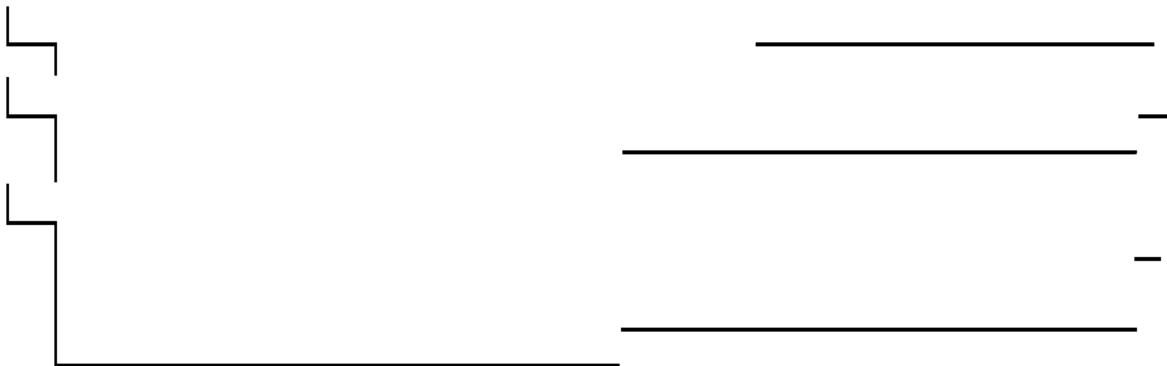
When the "second wave" of widespread Coronavirus infections was experienced by the country in October, a further list of critical staff was supplied to I.S. by the Senior Management Team. Between October and December remote access was provided to staff identified on this list who were confirmed as being Covid-19 positive or had been identified as close contact of a person who had been confirmed as Covid-19 positive.

In January 2021 additional capacity for [REDACTED] remote access connections ([REDACTED] was provided across all Directorates, the following month capacity of another [REDACTED] connections was offered and fulfilled.

7.4 Network Access

In order to provide secure remote access to their network, Donegal County Council used two separate platforms: Cisco Anyconnect VPN and Citrix Workspace Gateway. The broad outline of the process involved in setting up staff with remote network access is as follows:





7.5 Online Meetings

As a result of the new work arrangements put in place to ensure social distancing, there was a marked increase in the number of meetings which were held online rather than face to face. These meetings were across a large number of council functions including staff meetings, meetings with outside parties and elected member meetings.

The I.S. section determined that GoToMeetings was the remote platform which was best suited to conduct staff meetings. Initially, 100 licences were sourced and this was expanded to 150 as lockdown measures were extended.

Cisco Webex was added due to the requirement for online council meetings. Webex has capacity to deal with more video feeds; it is a more stable platform with better functionality. This platform is currently on an extended trial agreement with Cisco.

I.S. staff were also required to provide extra support for elected members and Council meetings. A number of Council meetings were held in the Aura Leisure Centre. Wi-Fi networks were configured and integrated into the broadband network at the Aura. I.S. also advised on audio systems in place for these meetings and advised against "hybrid meetings" where numerous people were on site and others joined remotely.

From 17th June 2020 to 17th June 2021, 5,215 online meetings were carried out involving DCC staff. This equated to 283,285 minutes worth of meetings involving 22,457 attendees. In contrast, for the prior six-month period there was approximately 371 meetings carried out. The numbers attending meetings were reported at the monthly Municipal District meetings.

7.6 Future Planning

In January 2021 the Irish Government announced "Making Remote Work" which is a new national strategy in relation to remote working for staff. These proposals focus on several key areas for facilitating remote working going forward:

- Mandating that home and remote work should be the norm for 20% of public sector employment

- Reviewing the treatment of remote working for tax and expenditure purposes
- Mapping and investing in a network of remote working hubs across the country
- Legislating for the right to request remote working
- Developing a code of practice to ensure staff welfare
- Accelerating the provision of high-speed broadband across the country

In its strategy, the government breaks down the benefits and challenges that have come with a mass shift towards remote working. The benefits include:

- Attracting and retaining talent
- Improving the work life balance of staff
- Improved child and family wellbeing
- A reduction in commute times

The strategy also highlights possible challenges in implementing remote working on a large scale:

- The impact on individuals' mental health
- Learning to "switch off" and keep regular working hours
- The possible impact on productivity

To ensure these benefits are experienced and risks are mitigated, the Government has committed to take action to remove barriers and develop infrastructure to support remote working into the future.

8. Findings

8.1 Guidance Information

The nature of the Covid-19 pandemic meant that both legislation and guidance at both a national and local level were constantly evolving, and this was echoed in the means of communicating the information.

Staff in various Directorates reported to IA that there was insufficient clarity on issues such as the different sections and staff grades which were permitted to work remotely and definite dates for returning to office work.

A review of guidance information also highlighted notable gaps in the timing of guidelines being issued at both a local and National level especially during the period of both lockdowns (i.e. March-May and October-December).

8.2 New Work Arrangements for Staff

Following the communications from H.R. and the Chief Executive in March 2020, Line Managers were tasked with identifying and implementing new work arrangements for staff in their area to ensure adherence to social distancing measures.

In order to implement these new working strategies, managers had to carry out several processes including:

- Identifying critical functions (e.g. payroll/H.R.)
- Assess the protocols being put in place and their resulting effect
- Liaise with H.R. and I.S. to ensure adherence to various guidelines in place

In order to record staff working remotely, the 'Business absence' function on the Core system was utilised. These records could be updated by the staff member if they had network access through the VPN. Alternatively, managers could update clocking records retrospectively using the Core Back Office application.

H.R. has provided the following information in relation to business absences recorded on the Core system for the period March – December 2020:

Business Absences Mar - Dec	2020	
	No. Employees	No. Business Absence days
Directorate		
Community Development & Planning	[REDACTED]	[REDACTED]
Economic Development, IS & Emergency Services	[REDACTED]	[REDACTED]
Finance		
Housing, Corporate & Cultural Services	[REDACTED]	[REDACTED]
Roads & Transportation	[REDACTED]	[REDACTED]
Water & Environment Services	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]

In order to ascertain the increase in staff using this function and to provide a broad outline of the number of staff working remotely in 2020, these figures were compared to the previous year:

Business Absences Mar - Dec	2019	
	No. Employees	No. Business Absence days
Directorate		
Community Development & Planning	[REDACTED]	[REDACTED]
Economic Development, IS & Emergency Services	[REDACTED]	[REDACTED]
Finance	[REDACTED]	[REDACTED]
Housing, Corporate & Cultural Services	[REDACTED]	[REDACTED]
Roads & Transportation	[REDACTED]	[REDACTED]
Water & Environment Services	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]

The following points are relevant in relation to these figures:

- Although there has been only a small increase in staff numbers, the average amount of business absences [REDACTED]
[REDACTED]
- There has been a marked overall increase [REDACTED] across the organisation in the number of days being recorded as business absences
- The Directorates which have seen the biggest increases were
[REDACTED]
[REDACTED]

Comment from [REDACTED]

"Different Directorates interpreted the remote working issue in different ways. Some adopted a liberal attitude and sought technical arrangements for a wide range of staff whilst other Directorates adopted a conservative approach. This lack of direction put I.S. in an impossible position as Council staff were coming directly to us seeking technical solutions."

"In effect I.S. had to identify key staff initially and put technical arrangements in place. Afterwards the decision making was forced back to SMT for sign off as it was not appropriate for I.S. staff to decide on applications for remote working. We viewed our role as putting approved arrangements in place rather than as decision makers on remote working".

8.3 Information Systems Processes

Owing to the increased workload faced by staff in the I.S. section in order to provide remote access to staff, processes and procedures were implemented to ensure that staff were provided with suitable access in an efficient manner.

These processes involved:

- Identifying staff providing critical functions to ensure that there was adequate access to systems and appropriate cover available in the event of increased staff absences
- Adapting to constantly changing information in relation to working arrangements
- Dealing with different approaches to the new work arrangements in different areas

Comment from

"In addition to the remote working and the online meetings supports Covid19 necessitated unplanned work in a number of other important business areas;

1. *The development of systems of receipts and payment of a wide range of government support grants to business*
2. *The development of CRM systems to support contact centre staff with the community support initiative*
3. *Ongoing website development for public information purposes*

During the Covid emergency day to day I.T. support requests have increased by about 50% which reflects the additional support Council staff need for the revised working arrangements".

8.4 Network Access

In October 2020, as the second Lockdown was announced by the Irish Government, the I.S. Section compiled a spreadsheet detailing the staff with existing remote access and staff with critical functions who required access to same. These details were broken down by Directorate:

Directorate	Staff No's
Economic Development, Emergency Services & Information Systems	[REDACTED]
Water and Environment	[REDACTED]
Finance	[REDACTED]
Roads & Transportation	[REDACTED]
Community Development and Planning Services	[REDACTED]
Housing, Corporate and Cultural Services	[REDACTED]
Total	[REDACTED]

As of June 2021, there [REDACTED] people working remotely with network access which represents almost a 50% increase from January.

After access was initially rolled out on a prioritised basis for staff identified as "essential workers", since January 2021 all requests for remote access have been facilitated through the Senior Management Team (SMT).

This resulted in an additional [REDACTED] being provided with access ([REDACTED] extra licences per Directorate) and a more systematic approach to providing remote access to staff.

The I.S. Section keeps a detailed record of staff with access to laptops. The information recorded includes:

- The staff member and section
- The laptop make and type
- The laptop serial number and operating system
- The laptop ID name

There are currently [REDACTED] staff laptops in use within DCC. As part of the process of providing remote access to staff, the I.S. Section had to source [REDACTED] extra laptops in order to facilitate remote working. This presented a number of different issues including following procurement directives whilst assessing the current stock of laptop availability to determine staff needs.

8.5 Online Meetings

The figures provided by I.S. show a marked increase in the number of online meetings conducted by DCC staff. This increase is in keeping with the guidelines issued by the LGMA which stated that meetings be conducted on a remote basis. The I.S. Section also reported several issues in relation to the setting up and conducting of the increased level of online meetings:

- One section advertised a "hybrid meeting" which caused an issue as other areas requested similar meetings. This put a considerable extra overhead on the support of a remote meeting and equipment required for same.
- A number of staff members created accounts on the "Zoom" meetings application, despite advice against the security of this platform at the initial stages of the pandemic. I.S. does not have any access to backend admin of Zoom so therefore have no record of usage of these accounts.

- I.S. purchased additional Wi-Fi Access points to put onto the Wi-Fi network to facilitate better coverage in County House for SMT and at the Public Service Centres to facilitate the Municipal District meetings. The network had to be substantially reconfigured to maximise the coverage with the equipment available.
- I.S. also purchased an additional high-speed broadband Connection into the County House to act as backup for online council meetings. This provided better capacity and improved redundancy.

8.6 Data Security and Future Planning

The security of all hardware, software and data was also an area that had to be considered by I.S. and all areas of the organisation as the new work arrangements were implemented. Increased numbers of staff working remotely presented new data security risks as staff accessed the Council network off-site. The transfer of data from laptops to drives on the network as staff returned to their offices also presented security issues.

A recent report conducted in February by the Institute of Internal Auditors highlighted that cyber crime has been exacerbated by the pandemic, with criminals capitalising by exploiting remote working protocols through increasing the pace and sophistication of cyber attacks.

Data protection is covered under Donegal County Council's "ICT Acceptable Use Policy" which covers issues such as data storage and transfer to non-council devices.

Data security is also covered under Rule 4 of Donegal County Council's Data Protection Policy (2013) which states that:

"High standards of physical and technical security are essential to protect the confidentiality of all personal data and are expected of all employees."

The policy goes on to state:

"These may include [...] ensuring that personal data is protected by a high standard of encryption when being stored on portable devices or transferred electronically"

Following the implementation of new work protocols, the Local Government Management Agency (LGMA) produced a document on safe operating guidance for working from home; this was forwarded to all staff in September 2020.

This document provided guidance on data security, integrity and confidentiality when working remotely. It also provides advice on the use and storage of devices such as laptops, USBs, and phones.

Measures put in place by I.S. such as encrypted devices, regular security updates and return to work information forms helped alleviate potential security issues for remote working.

However, despite these measures there was evidence of actions which may have resulted in data security issues e.g. at least one section removed hardware from their office for remote working without the prior consent of I.S.

An LGMA survey conducted in July 2020 identified the need for sufficient I.T. capabilities to support remote working for staff. It also highlighted the need for proper support in the use of online and telephone communication channels for efficient public service delivery. These findings should be considered as Donegal County Council implements the new Government strategy in relation to remote working.

9. Conclusions and Recommendations

It is recommended that the findings in this report be considered and that appropriate remedial action be taken where necessary.

9.1 Legislation and Guidance

Conclusion

The frequently changing information issued by various bodies throughout both lockdown periods in 2020 led to some confusion among both line managers and staff as to who was eligible for alternative working arrangements and how the process should be applied in their area.

The research conducted during this audit suggests a lack of consistency across the functions of the organisation in both how the different work arrangements were applied and the eligibility of staff for working remotely. This may be as a result of either a lack of guidance being issued or how the information was interpreted by managers across the organisation.

Although there were regular communications from various sources such as the Chief Executive, H.R. and the "Covid 19 updates" application on DCC's intranet, there were gaps in the timeline of how information was communicated and staff were not always alerted to updates as they occurred.

Recommendation

Internal Audit acknowledges the unprecedented challenges presented to Local Authorities and the public sector in general in an ever-changing working environment during 2020.

However, it is recommended that Donegal County Council employs a 'lessons learned' approach in relation to how information is relayed during emergency events.

The nature of the Covid-19 pandemic meant that information in relation to the response to Covid-19 and measures in relation to social distancing changed on an almost daily basis. It is vital that staff are alerted to changes such as these as they happen in future events of this nature.

9.2 New Work Arrangements for Staff

Conclusion

The only means of calculating the numbers of staff availing of the remote working facility was obtaining data from the Core system on staff that had used the 'Business Absence' clocking option.

These figures showed significant increases in staff using this option across the organisation; however, it is not possible to ascertain exact numbers for staff working remotely without conducting further detailed analysis of the Core system and/or analysing individual staff records.

Recommendation

It is recommended that H.R. and/or Line Managers across the organisation carry out a report on the Core system to ascertain more precise figures in relation to the numbers of staff that have availed of remote working. These figures would benefit both managers and the organisation as a whole in the event of future crisis events.

9.3 Information Systems processes

Conclusion

The I.S. section faced a number of difficulties in providing remote working access and ensuring the protection of both data and DCC's network itself. A lack of staff resources placed an added workload on staff which meant tasks had to be prioritised.

Constantly changing information meant that there was a lack of clarity re alternative working arrangement; this resulted in some inconsistency in processes and access. The shifting work environment required flexibility in adapting processes and procedures in order to facilitate staff needs.

Recommendation

It is recommended that Senior Management liaise with I.S. in order to identify potential weaknesses in processes in the event of an emergency situation.

It is also recommended that a comprehensive review of all I.S. resources be conducted in order to ensure both the staff numbers and digital infrastructure are in place to respond to crisis events.

9.4 Network Access

Conclusion

The ever-changing nature of the work arrangements and protocols in place meant that the I.S. Section had to remain flexible in their response to requests for remote network access.

During the initial lockdown, there was a lack of consistency in how requests for access were submitted to I.S. which can be attributed to a lack of clarity in the information being communicated from various sources.

The compilation of details of staff working remotely during the second lockdown in October 2020 alleviated these issues and the centralisation of requests through Senior Management from January 2021 has helped streamline the network access process.

Recommendation

It is recommended that a comprehensive central record of staff working remotely is kept and updated as necessary by both H.R. and I.S.; this will enable managers and I.S. staff to identify potential risks in service delivery as well as potential staff to provide cover in areas where extra resources are required.

9.5 Online meetings

Conclusion

Although I.S. communicated to all staff the guidelines for conducting meetings including the recommended platform to use, there were a number of breaches of these guidelines which posed potential risks in relation to I.S. operations and data security.

Recommendation

It is recommended that the I.S. Section issue a document to all staff outlining the processes for carrying out all online meetings. This document should include relevant information in relation to the platform to be used and potential data security risks when conducting meetings remotely.

9.6 Data Security and Future Planning

Conclusion

The area of data security is a key issue in the area of remote working and the post Covid-19 work environment.

It is evident from this audit that there is currently a lack of a structured approach towards data security within Donegal County Council and a disconnect between the Corporate Directorate and the I.S. Section in their approaches to same.

A structured approach towards data security and implementing a stronger cyber security culture across the organisation is required in order to avoid cybersecurity attacks similar to that suffered by the Health Service Executive recently.

This approach should consider factors such as:

- An up to date cyber security strategy and policy
- Proper governance of I.T. resources from both a technical and business aspect.
- Senior Management support
- Improved awareness of cyber security among staff at all levels of the organisation
- Structured guidance in relation to data security with a particular focus on the transfer and storage of data

Recommendations

It is recommended that I.S. and the Corporate Directorate engage in a consultation process to promote awareness of cyber and data security and put in place proper guidance and processes in relation to same.

This information will be of vital importance as the Government's plans for increased numbers of staff working remotely and "hybrid" works arrangements are implemented.

Staff training should also be provided across the organisation to ensure staff are made aware of and properly equipped to deal with cyber threats such as phishing and malware.

Response from [REDACTED]

"I agree with the need for business led corporate governance rules for protecting Council systems and data as well as clearly defined rules for remote working.

LGMA had produced a sectoral draft in 2020 which covered all aspects of remote working including HR and Data Protection considerations as well as the technical issues".

I'm not sure if this strategy has been completed but something of this nature is definitely required if remote working is to continue as a permanent fixture".

10. Acknowledgement

I would like to acknowledge the assistance and co-operation of staff from the I.S. Section as well as the H.R. and Staff Welfare Sections in the course of this Audit. Their prompt response and willingness to engage with Internal Audit helped ensure this audit was completed in a prompt and efficient manner.

Sean Canning

**Sean Canning,
A/INTERNAL AUDITOR.**

Appendix 1 – Circulation List

19/08/2021 Final Report sent to:

[REDACTED]

Copied to:

[REDACTED]

16/07/2021 Draft Report sent to:

[REDACTED]

Copied to:

[REDACTED]

Appendix 2 – Audit Classification

Level	Definition
1. Substantial	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> -There is a robust system of risk management, control and governance - The systems in place should ensure that objectives are fully achieved - The control processes tested are being applied consistently
2. Adequate	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is a generally adequate system of risk management, control and governance - The systems in place should ensure that essential objectives are fully achieved - The control processes tested are, in general, being applied consistently - However, there are some weaknesses in control that are placing some objectives at risk. There is a risk that some objectives may not be fully achieved - Some improvements are required to enhance the adequacy and/or effectiveness of risk management, control and governance
3. Limited	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is a weak system of risk management, control and governance - There is considerable risk that objectives will not be achieved - The control processes that exist are not being applied consistently - There are some significant weaknesses in control in a number of areas - Prompt action is required to improve the adequacy and effectiveness of risk management, control and governance
4. Unsatisfactory	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is an inadequate system of risk management, control and governance - The system has failed or there is a real and substantial risk that the system will fail to meet its objectives - Systems/processes are open to significant error or abuse - Urgent action is required to improve the adequacy and effectiveness of risk management, control and governance
5. No Assurance	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - Internal Audit has been unable to form an opinion on the system of risk management, control and governance - Internal Audit has been unable to access or has been prevented from accessing essential information required to form an opinion - Internal Audit has not received the cooperation of staff/management

Appendix 3 – IA21/01 Remote Working & I.S. Response 2020 - Summary Recommendations

	<i>Recommendations</i>	<i>Response from Directorate</i>	<i>Follow-up Actions undertaken by</i>	<i>Timeline</i>
1	<p><u>9.1 Legislation and Guidance</u></p> <p>It is recommended that Donegal County Council employs a “lessons learned” approach in relation to how information is relayed during emergency events.</p>	<p>An ongoing review of the type and form of communication channels, the frequency and timing of communications within the organisation and the effectiveness of those is being implemented and monitored at SMT level.</p> <p>In this regard, one option being explored is the development of a staff APP which would add to the existing tools used for communications with staff, i.e. by email Intranet, text etc</p>	Corporate/I.S.	Ongoing
2	<p><u>9.2 New work arrangements for staff</u></p> <p>It is recommended that H.R. and/or Line Managers across the organisation carry out a report on the Core system to ascertain more precise figures in relation to the numbers of staff that have availed of remote working.</p>	<p>The Core/People XD system is a national system that will be adapted to capture blended/remote working, as part of the implementation of the new Blended working Strategy for the Local Authorities.</p> <p>Remote working is defined as either working at home, in an area office or a hub as agreed with line managers.</p>	Corporate/I.S.	Ongoing

3	<p><u>9.3 Information Systems processes</u></p> <p>It is recommended that Senior Management liaise with I.S. in order to identify potential weaknesses in processes in the event of an emergency situation.</p> <p>It is also recommended that a comprehensive review of all I.S. resources be conducted in order to ensure both the staff numbers and digital infrastructure are in place to respond to crisis events.</p>	<p>This recommendation is so wide as to be impractical to apply. However, Senior management, in identifying issues arising in processes as a result of remote working engage with relevant services, including IS, to identify and develop solutions to issues presenting, and will continue to do so in the future as the evolving national remote working policy is developed for the Local Authority sector into 2022.</p> <p>The human, capital and revenue resources required to maintain both normal and enhanced response capabilities within the Council, to ensure that the service levels required and expected, remain in continuous review as part of the management of the IS Division. Prioritization of tasks and realignment of human resources in particular, to meet unforeseen demand, whether through a pandemic or through an unexpected external demand, is the normal response to managing this. This is carried out within the envelope of available limitations on staffing & financial resources.</p>	SMT/I.S.	Ongoing
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		<p>It is intended in 2022, as part of a cyclical review, to assess the level and extent of IS resources in place at present and to consider what changes in those levels and types of resources are needed in the future to meet the ever increasing demands of this service.</p>		
4	<p><u>9.4 Network Access</u></p> <p>It is recommended that a comprehensive central record of staff working remotely is kept and updated as necessary by both H.R. and I.S</p>	<p>The Core/People XD system is a national system that will be adapted to capture blended / remote working, as part of the implementation of the new Blended working Strategy for the Local Authorities. Remote working is defined as either working at home, in an area office or a hub as agreed with line managers.</p> <p>IS has and does retain a record, on an ongoing basis, of staff that have been provided a capability, from an IS perspective, of working remotely.</p>	Corporate/I.S.	Ongoing
5	<p><u>9.5 Online meetings</u></p> <p>It is recommended that the I.S. Section issue a document to all staff outlining the processes for carrying out all online meetings.</p>	<p>Training/tutorials have been provided, from a technical and accessing perspective by IS to staff and members requiring this facility.</p> <p>It has been recommended that a limited number of platforms be used, for security reasons and this will be reviewed into the future.</p>	I.S.	Ongoing

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6	<p><u>9.6 Data Security and Future Planning</u></p> <p>It is recommended that I.S. and the Corporate Directorate engage in a consultation process to promote awareness of cyber and data security and put in place proper guidance and processes in relation to same.</p> <p>Staff training should also be provided across the organisation to ensure staff are made aware of and properly equipped to deal with cyber threats such as phishing and malware.</p>	<p>The Training Dept. (HR) is currently rolling out a "Phishing" awareness programme to all staff with email access. This work is being undertaken in conjunction with IS.</p> <p>Information/data security is to be reviewed as part of a broader Corporate Governance framework in 2022.</p>	<p>H.R. /I.S.</p> <p>Corporate</p>	<p>2022</p> <p>2022</p>

Appendix 4 – Return to Work Form



Donegal County Council Covid-19 Pre- Return to Work Form

Question	Yes	No
1. Do you have symptoms of cough, fever/high temperature, difficulty breathing, loss or change to your sense of smell or taste now or in the past 14 days?		
2. Have you been diagnosed with confirmed or suspected COVID-19 infection in the last 14 days?		
3. Are you awaiting the results of a COVID-19 test?		
4. In the past 14 days have you been in contact with a person who is a confirmed or suspected case of COVID-19?		
5. Have you been advised to self-isolate at this time?		
6. Have you been advised to restrict your movement at this time?		
7. Have you been advised to cocoon at this time?		
8. Please provide details* below of any other circumstances relating to COVID-19, not included in the above, which may need to be considered to allow your safe return to work. Further information on people at higher risk from Coronavirus can be accessed here People at higher risk from COVID-19 - HSE.ie		
Additional Information		

If you are unsure whether or not you are in an at risk category, please check the link at question 8.

I confirm that I have responded to the questions above truthfully based on my current condition.

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I also commit to advising Line Management if this situation changes and I will exclude myself from my work location should I develop COVID-19 Symptoms and seek GP advice while I self-isolate at home.

Name: _____

Employee Number: _____

Signature: _____

Date: _____

Employer: _____

Donegal County Council will protect your personal data and use it only for the purpose of confirming RTW as part of Covid-19 protocol

Appendix 5 - Working from Home Self Declaration Questionnaire



Donegal County Council Working from Home Self Declaration Questionnaire

Name:		Date:	
Line Manager:		Location:	
Dept/Office		Division:	
Hazard Checklist			
Working environment of area where remote working takes place:			Y/N
<ul style="list-style-type: none"> • Is there sufficient ventilation? • Can windows be opened without risk to employee or others? • Is there sufficient lighting for the task? • Is there sufficient heating? • Are heating systems / portable heaters maintained in good working order? • If portable heaters are used are these positioned to prevent toppling and away from combustible materials? • Is there sufficient space for all the furniture and equipment used? • Is flooring in good condition and free from trip hazards? • Is there sufficient safe and secure storage space for equipment and documents used? 			

<ul style="list-style-type: none"> Is the work area subject to noise at a level which is likely to affect the employee's concentration? 	
Electrical safety:	
<ul style="list-style-type: none"> Is the fixed electrical system in good condition e.g. no signs of scorching or arcing on sockets? Are there a sufficient numbers of sockets to prevent overloading? Is electrical equipment used for remote working in good condition and free from any visual faults? Does the employee undertake visual checks of electrical equipment to identify any obvious faults such as worn or damaged leads or plugs? 	
Safe Posture	
<ul style="list-style-type: none"> Has the employee received training / information on how to set up their workstation to avoid poor posture? Does the chair used provide sufficient lumbar support? Can the chair be adjusted so that the employee can sit with their shoulders in a relaxed position and their elbows at a 90° angle, with the upper arms vertical and forearms horizontal whilst keying and using the mouse? Is the work surface of a sufficient size to accommodate all the equipment to be used? Is the sufficient space in front of the keyboard for the employee to rest their hands in between keying? Is there sufficient space below the work surface for the employee's legs to enable them to stretch and change position? 	

<ul style="list-style-type: none"> • If the employee has to use a laptop do they use a docking station / laptop riser? • Is the employee likely to regularly use the telephone whilst using the keyboard or mouse? (If yes, a headset should be provided). • Is the employee aware of the importance of taking regular breaks from computer based work before fatigue sets in? • Has the employee experienced pain or discomfort when using the computer at home? If YES, Has employee been made aware of DCC's arrangements for referral for medical assessment in the event of an injury, health issue, etc 	
Visual Fatigue	
<ul style="list-style-type: none"> • Is the screen positioned at the correct height and viewing distance? (The employee's eye-line must be just below the top of the screen and the screen must be positioned directly in front of the user at approximately an arm's length away). • Is the screen free from glare or reflections? (Ideally the screen should be at right angle to windows, windows should be provided by blinds or curtains to prevent glare from falling onto the screen.) • Is the screen free from flicker and are images clear and stable? • Has the employee had a recent eye-sight test? • Has the employee been advised of the need to seek medical attention or assessment if required? Employees are required to self notify their employer of any changes in their medical condition which would affect their ability to carry out their work. 	
Stress	
<ul style="list-style-type: none"> • Is there sufficient segregation from disruptions e.g. children, pets, other 	

<p>family members?</p> <ul style="list-style-type: none"> • Are there arrangements for keeping in contact with the remote worker? • Are there arrangements in place to conduct regular supervision / personal development reviews with the remote worker? • Does the remote worker have support to deal with either IT problems or other specific work queries? E.g. contact numbers available. • Does the remote worker have access to sufficient training, information and instruction to enable them to undertake their work safely? 	
<p>Emergency Arrangements</p> <ul style="list-style-type: none"> • Does the accommodation used for remote working have a smoke alarm? • Has the remote worker identified what they will do in the event of a fire? (They must plan their escape route and what they would do if the route was unavailable due to fire / smoke, e.g. having tools to break double-glazed windows etc.) 	
<p>Security Considerations</p> <ul style="list-style-type: none"> • Is the accommodation used for remote working a safe environment? • Is any documentation, whether electronic or physical, visible or accessible by others? For example passers-by looking in. • Is the remote worker aware there is an expectation that employer equipment would need to be kept out of sight / harm or locked away in a secure place (for example not a car) when not in use? 	

Action taken by employee to address any issues:	
Action taken by Line Manager to address any issues	
Signed Line Manager: _____ Date: _____ Employee: _____ Date: _____	