

## Audit and Assurance Committee

The author must complete this page before submitting the paper to the Business Support Office.

### Publication

To demonstrate openness and transparency, all governance group papers will now be published on the website of Social Security Scotland. All governance group papers should be written in line with the Writing for Publication Guidance.

Papers which contain sensitive information which should not be published must set out the reasons why. The author must identify the relevant exemption which should apply. The exemption should be stated in the section below, with the reasoning for this decision. Please speak to the Data Protection and Information Governance team before submitting your paper if you are unsure which exemption may apply.

1. I am aware that this paper may be published in the public domain and I am content for the information to be published.
2. I believe information in this paper should be withheld from publication and that an exemption applies.

38(1)(b): An exemption under section 38(1)(b) of FOISA (personal information) applies to a small amount of the information requested because it is personal data of a third party, ie names of individuals and disclosing it would contravene the data protection principles in Article 5(1) of the General Data Protection Regulation and in section 34(1) of the Data Protection Act 2018. This exemption is not subject to the 'public interest test', so we are not required to consider if the public interest in disclosing the information outweighs the public interest in applying the exemption.

35(1)(a): An exemption under section 35(1)(a) of FOISA applies to some of the information you have requested. This exemption applies where disclosure of information under the Act would, or would be likely to, prejudice substantially the prevention or detection of crime. To disclose the information requested would place the security of this key system in delivery of social security benefits at risk if the specific details of its capability and vulnerabilities were made public.

This exemption is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, there is a greater public interest in the security and integrity of the system that is key to the payment of social security benefits to the people of Scotland.

2.1. Please state the exemption and explain your reasoning:  
Paper Summary for Website Publication (max 100 words)

This internal audit review of SPM (Social Programme Management, the client management system used for the administration of the benefits delivered by Social Security Scotland) formed part of the Audit Plan agreed by the Accountable Officer and noted by the Audit and Assurance Committee in February 2021. The scope of this review was to evaluate and report on the controls in place to manage the risk surrounding Social Security Scotland's SPM system arrangements. The review focussed on the arrangements in place for the management of Bugs and Defects; Technical Debt; and System Changes, Developments and Controls.

Paper authors should write a short paragraph here to summarise the content of the paper.