

# **Directorate for Internal Audit and Assurance**

# **Internal Audit Report**

# Social Security Scotland 2022-23

# **Incident Management**



**Directorate for Internal Audit and Assurance** 

Issue Date: 12-04-2023

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### 1. Introduction

#### 1.1. Introduction

This Internal Audit review of Incident Management formed part of the Audit Plan agreed by the Accountable Officer and noted by the Audit and Assurance Committee on 25 March 2022. The Accountable Officer for Social Security Scotland is responsible for maintaining a sound system of governance, risk management and system of internal control that support the achievement of the organisations policies, aims and objectives.

#### 1.2. Audit Scope

The scope of this review was to evaluate and report on the controls in place to manage the risk surrounding Social Security Scotland's Incident Management arrangements.

To aide understanding, it is important to clearly set out the relationship between Social Security Scotland and the Social Security Directorate (Programme). Social Security Directorate designs and builds the new Scottish social security system and is delivering the components on an incremental day to day basis. As such Minimal Viable Products for policies, systems and processes for each benefit are built by Social Security Directorate, and then handed to Social Security Scotland to deliver. It is then the responsibility of Social Security Scotland to develop these as appropriate to make them fit for purpose and reflecting actual processes and controls in place.

The agreed Terms of Reference for this review is attached at Annex B.

#### **1.3. Assurance and Recommendations**

|   | Assurance Category         | Reasonable |        |     |  |  |
|---|----------------------------|------------|--------|-----|--|--|
|   | Person mondations Priority | High       | Medium | Low |  |  |
| 1 | Recommendations Priority   | 0          | 4      | 1   |  |  |

Our review has identified four medium and one low priority recommendations. A reasonable assurance rating has been provided. Some improvements are required to enhance the adequacy and effectiveness of procedures. There are weaknesses in the risk, governance and/or control procedures in place but not of a significant nature.

The rationale for this is that Internal Audit recognises that there are significant processes and procedures in place to manage incidents as they occur, there is room to strengthen and develop these processes to ensure they work more effectively. Internal Audit recognises that some of the challenges faced by Social Security Scotland are as a result of tight timeframes within Programme prior to roll out. However, Social Security Scotland is proactive in continually improving response to these issues and has documentation in place to support these activities.

We note that in order to avoid duplication of work, this audit review placed assurance on work done by the Digital Assurance Office who undertake go live gate reviews on pre-release arrangements. The latest report highlighted issues with the testing, and bad practice in relation to timescales for testing being pushed back limiting the time and ability to do testing prior to release. This includes regression testing, which while highlighted as part of the terms of reference, was then found to be outside the remit of this review as this work sits within Programme exclusively. Recommendations are raised through Digital Assurance Office reports and implementation is monitored.

Findings are summarised against recommendations made in the <u>Management</u> <u>Action Plan</u>.

Full details of our findings, good practice and improvement opportunities can be found in section 3 below.

Please see <u>Annex A</u> for the standard explanation of our assurance levels and recommendation priorities.

## 2. Management Action Plan

#### 2.1. Management Action Plan

Our findings are set out in the Management Action Plan below

| No. | Issue & Risk                                    | Recommendation              | Priority | Management Response & Action<br>Owner  | Actior<br>Date |
|-----|---|-----------------------------|----------|--|----------------|
| 1   | Major Incident Response Framework               | The Major Incident          |          | Response: Accepted                     | Aug            |
|     | Issue:  | Response Framework          |          |  | 2023           |
|     | Sections of the Major Incident Response         | document should be          |          | Action: The Major Incident             |                |
|     | Framework document relating to major IT         | reviewed and updated to     |          | Framework is currently under review,   |                |
|     | Incidents require update to ensure alignment    | ensure it reflects current  |          | including the current Officer in       |                |
|     | with the management of Priority 1 (P1)          | practices in the            |          | Charge process and their role in       |                |
|     | incidents. See paragraph <u>3.2.1.</u> for more | management of P1            |          | technical related incidents. The       |                |
|     | detail.   | incidents.                  | М        | Business Resilience Lead will initiate |                |
|     | Risk:   |                             |          | discussions with required              |                |
|     | Incorrect or conflicting information may result | Management should           |          | stakeholders to agree clarity and      |                |
|     | in delays in responding to and managing IT      | ensure such a document is   |          | triggers for when the Officer in       |                |
|     | incidents, negatively impacting on payments to  | subject to periodic reviews |          | Charge/Major Incident Framework        |                |
|     | customers and/or delays in processing           | to ensure it remains        |          | should be invoked. The updated         |                |
|     | applications.                                   | accurate and up to date     |          | framework will include links to        |                |
|     |   | and fit for purpose.        |          |  |                |

| No. | Issue & Risk                                   | Recommendation             | Priority | Management Response & Action Owner     | Actior<br>Date |
|-----|--|----------------------------|----------|--|----------------|
|     |  |                            |          | incident materials referenced within   |                |
|     |  |                            |          | section 3.2.1                          |                |
|     |  |                            |          |  |                |
|     |  |                            |          | Once the framework is updated, it      |                |
|     |  |                            |          | will be subject to an annual review    |                |
|     |  |                            |          | (as per other Business Resilience      |                |
|     |  |                            |          | documentation).                        |                |
|     |  |                            |          | Action Owners [Dedacted] Business      |                |
|     |  |                            |          | Action Owner: [Redacted] Business      |                |
|     |  |                            |          | Resilience Team                        |                |
| 2   | Chief Digital Office Incident Management       | a) Guidance and            |          | Response: Recommendations A, B         | Aug            |
|     | Guidance and Processes                         | documented processes for   |          | and C accepted                         | 2023           |
|     | Issue 1:                                       | incident management        |          |  |                |
|     | Guidance and documented processes for          | arrangements in the Chief  |          | Action:                                |                |
|     | incident management arrangements in the        | Digital Office should be   | М        | a) CDO IT Service                      |                |
|     | Chief Digital Office are not always in place,  | completed and/or reviewed  |          | Incident/Request/Problem               |                |
|     | formally reviewed and signed off. See          | and formally signed off.   |          | Management Process reviews to          |                |
|     | paragraphs $3.2.4$ to $3.2.7$ for more detail. | Appropriate document       |          | allow formal approval / distribution / |                |
|     |  | controls should be used to |          | governance including review            |                |

| No. | Issue & Risk                                       | Recommendation                 | Priority | Management Response & Action<br>Owner | Action<br>Date |
|-----|--|--------------------------------|----------|---------------------------------------|----------------|
|     | Issue 2:   | allow for audit trail of       |          | schedule. This will underpin          |                |
|     | Staff are unaware of how priorities are            | reviews.                       |          | formation of Operations Handbook in   |                |
|     | allocated to Jira tickets which have been          |                                |          | addition to providing framework for   |                |
|     | raised.  | b) Information on how          |          | Local Working Procedures.             |                |
|     |  | prioritisation is allocated to |          |                                       |                |
|     | Risk:  | Jira tickets should be         |          | b) Updated IT Service Incident /      |                |
|     | Lack of clear guidance and processes may           | made available to all          |          | Request / Problem Management          |                |
|     | result in tickets being allocated inappropriate    | Social Security Scotland       |          | definitions to include Service Level  |                |
|     | prioritisation, resulting in delays in response    | staff.                         |          | Target (SLT) information in the       |                |
|     | and an inadequate level of service being           |                                |          | revised IT Service Management         |                |
|     | provided.  | c) Management should           |          | Process documents.                    |                |
|     |  | consider if the process for    |          | Action Owner: [Redacted]              |                |
|     | Staff are unaware of progress against tickets      | closure of Jira tickets could  |          |                                       |                |
|     | raised and may raise further tickets, resulting    | be made more efficient by      |          | c) IT service desk to review the      |                |
|     | in increasing workloads, negatively impacting      | Live Service Team having       |          | process regarding update and          |                |
|     | on the ability to response to tickets effectively. | access to do this, where       |          | closure of incidents                  |                |
|     |  | appropriate.                   |          |                                       |                |
|     |  |                                |          | Action Owner: [Redacted]              |                |
|     |  |                                |          |                                       |                |

| No. | Issue & Risk                                     | Recommendation               | Priority | Management Response & Action<br>Owner | Action<br>Date |
|-----|--|------------------------------|----------|---------------------------------------|----------------|
| 3   | Incident Communication Plan                      | The communications           |          | Response: Partially accepted          | June 23        |
|     | Issue:   | approach/plan for            |          | see comments                          |                |
|     | Whilst Social Security Scotland has adopted      | managing incidents should    |          |                                       |                |
|     | the Scottish Government communications           | be reviewed and updated      |          | Social Security Scotland has a        |                |
|     | process guides, at the time of the fieldwork, we | to ensure that this reflects |          | dotted line into Scottish Government  |                |
|     | were unable to obtain evidence of there being    | the needs of the Social      |          | Communications Division. As such, it  |                |
|     | an agreed Social Security Scotland specific      | Security Scotland.           |          | adopts Scottish Government            |                |
|     | communications approach/plan for incidents.      |                              |          | Communications Division ways of       |                |
|     | We also noted these process guides were not      | Management should            |          | working – including our approach to   |                |
|     | integrated into the wider Social Security        | ensure that key              | NA       | incident and crisis communications    |                |
|     | Scotland Major Incident Response Framework       | stakeholders are involved    | М        | and our sign off processes.           |                |
|     | and there was limited awareness and              | in agreeing the final        |          |                                       |                |
|     | understanding of the process outwith the         | approach. As part of the     |          | When an incident occurs,              |                |
|     | Communications team.                             | review, feedback and         |          | communication will allocate a lead to |                |
|     |  | lessons learned from         |          | be part of the incident response      |                |
|     | During our fieldwork we reviewed the Incident    | previous incidents in        |          | team. They will assess the situation  |                |
|     | Lessons Learned tracker and this highlighted     | relation to communications   |          | and provide communication advice      |                |
|     | issues with communications to staff and          | should be considered.        |          | and then follow existing processes to |                |
|     | stakeholders in relation to ongoing incidents.   |                              |          | deliver required communication        |                |
|     |  |                              |          | outputs. The communication team       |                |

| No. | Issue & Risk                                   | Recommendation             | Priority | Management Response & Action<br>Owner  | Action<br>Date |
|-----|--|----------------------------|----------|--|----------------|
|     | Risk:  | The final approach should  |          | have a good understanding of their     |                |
|     | The communications approach to incidents is    | be integrated in the Major |          | roles and responsibilities and         |                |
|     | ineffective, action taken is inconsistent and  | Incident Response          |          | processes.                             |                |
|     | disjointed across teams in Social Security     | Framework and              |          |  |                |
|     | Scotland and relevant staff and stakeholders   | communicated to all those  |          | We accept that the existing            |                |
|     | not being made aware of incidents which have   | involved in incident       |          | communication processes are not        |                |
|     | occurred, resulting in duplicate tickets being | management activities.     |          | widely understood by others involved   |                |
|     | raised unnecessarily and inconsistencies in    |                            |          | in the incident response. To resolve   |                |
|     | messaging and engagement leading to            |                            |          | this, we will develop a short overview |                |
|     | reputational damage and impacting negatively   |                            |          | of the communication approach to       |                |
|     | on staff morale.                               |                            |          | incidents to be included within Social |                |
|     |  |                            |          | Security Scotland incident             |                |
|     |  |                            |          | documentation. This will include       |                |
|     |  |                            |          | clarity on roles and responsibilities. |                |
|     |  |                            |          | Sign off processes are well            |                |
|     |  |                            |          | established and are widely used        |                |
|     |  |                            |          | across Scottish Government and its     |                |
|     |  |                            |          | agencies. These move at pace when      |                |
|     |  |                            |          | required. All steps in these           |                |

| No. | Issue & Risk                                 | Recommendation            | Priority | Management Response & Action Owner    | Actio<br>Date |
|-----|--|---------------------------|----------|---------------------------------------|---------------|
|     |  |                           |          | processes are required to ensure      |               |
|     |  |                           |          | communication activity is appropriate |               |
|     |  |                           |          | and accurate and doesn't create       |               |
|     |  |                           |          | other unintended risks or issues.     |               |
|     |  |                           |          | Action:                               |               |
|     |  |                           |          | Action Owner: [Redacted] External     |               |
|     |  |                           |          | Communications Team Leader            |               |
|     |  |                           |          | (Corporate)                           |               |
| 4   | Lessons Learned                              | Consideration should be   |          | Response: Accepted                    | Jun           |
|     | Issue:                                       | given to centralising the |          |                                       | 2023          |
|     | Lessons learned processes are disjointed and | lessons learned process   |          | Action: Lessons learned process       |               |
|     | not appropriately centralised.               | for incident management   |          | already established. Business         |               |
|     |  | to ensure all relevant    | М        | Resilience Lead has linked with       |               |
|     | Risk:  | lessons are captured and  |          | Agency Lessons Learned Lead and       |               |
|     | Lessons learned may not be adequately        | planned improvements      |          | has agreed to shadow some future      |               |
|     | captured and reflected across the            | monitored and rolled out  |          | lessons learned event. In order to    |               |
|     | organisation, failing to demonstrate         | across delivery.          |          |                                       |               |

| No. | Issue & Risk                               | Recommendation             | Priority | Management Response & Action<br>Owner | Actio<br>Date |
|-----|--|----------------------------|----------|---------------------------------------|---------------|
|     | improvement, not be subject to appropriate |                            |          | upskill and facilitate session        |               |
|     | scrutiny and implemented as needed.        | Appropriate scrutiny       |          | following a major incident            |               |
|     |  | should be in place to help |          | Support will also be provide when     |               |
|     |  | ensure that activities are |          | needed from the Agency Change         |               |
|     |  | prioritised in line with   |          | Manager.                              |               |
|     |  | business needs.            |          | Action: work is currently ongoing by  |               |
|     |  |                            |          | the Business Resilience Team to       |               |
|     |  |                            |          | streamline process for lessons        |               |
|     |  |                            |          | identified from incidents.            |               |
|     |  |                            |          | Agreement should be made by key       |               |
|     |  |                            |          | stakeholders as to how lessons        |               |
|     |  |                            |          | identified are made visible,          |               |
|     |  |                            |          | prioritised, and progressed           |               |
|     |  |                            |          | accordingly – and aligned with other  |               |
|     |  |                            |          | lessons learned existing processes.   |               |
|     |  |                            |          | Action Owner: [Redacted]              |               |
| 5   | Compliance with Major Incident Guidance    | Management should          | L        | Response: Accepted                    | Jun           |
|     | Issue:                                     | ensure sufficient controls | L        |                                       | 2023          |

| No. | Issue & Risk                                   | Recommendation              | Priority | Management Response & Action<br>Owner | Action<br>Date |
|-----|--|-----------------------------|----------|---------------------------------------|----------------|
|     | Post Incident reports, Incident Logs and       | are in place to ensure that |          | Action: The Business Resilience       |                |
|     | Lessons learned/feedback forms are prepared    | all reports and logs for    |          | Team have recently created an excel   |                |
|     | by Officers in Charge for all Major Incidents. | major incidents are         |          | sheet to track paperwork for all      |                |
|     | These are collated by the Business Resilience  | completed in line with the  |          | incidents, to ensure all necessary    |                |
|     | Team, however, no tracker is in place to       | Major Incident Response     |          | logs are returned by relevant         |                |
|     | ensure that reports and incident logs were     | guidance.                   |          | response team members.                |                |
|     | completed as per official guidance.            |                             |          |                                       |                |
|     |  | Exceptions to this should   |          | A process for non-returns will be     |                |
|     | Risk:  | be examined.                |          | determined and documented within      |                |
|     | Failure to complete documentation in line with |                             |          | the next version of the Business      |                |
|     | guidance may result in inaccurate records,     | Roles and responsibilities  |          | Continuity framework.                 |                |
|     | inappropriate closure of incidents and an      | for this should be formally |          |                                       |                |
|     | inability to capture all lessons learned and   | assigned.                   |          | Action Owner: [Redacted] Business     |                |
|     | ensure remedial action is taken to enable      |                             |          | Resilience                            |                |
|     | continuous improvement in relation to incident |                             |          |                                       |                |
|     | management.                                    |                             |          |                                       |                |



### 3. Findings, Good Practice and Improvement Opportunities

### 3.1. Good Practice

#### Remit 1 – Pre-release governance arrangements

- 3.1.1. Responsibility for the development of releases to be applied to systems lies within Programme. Social Security Scotland participate in release management processes and this engagement generally starts around 12 weeks out from release. This involves ensuring that the Release Managers understand the scope being released at an early stage. Immediately after release, a 'Hypercare' system is implemented while upgrades bed into a steady state. The length of time this is provided for is normally between six weeks and six months. There is documented guidance in place for this and work is ongoing to ensure this works effectively. Social Security Scotland is notified of potential issues from Programme prior to roll-out. Broadly, Social Security Scotland agree which defects can be put into live with the various releases. Impact testing will be undertaken to inform management and enable agreement of which ones are acceptable and which ones are not.
- 3.1.2. The first phase of the Hypercare support is implemented during the 'Go Live Weekend', with establishment of a Jira Board (This displays the team's work as cards you can move between columns. In Jira Software, cards and the tasks they represent are called "issues". The Jira Board aligns with the team's processes and allows for tracking the status of each issue as it makes its way through the team's process, ready for defect creation.). There is agreement around how tickets should be raised. This includes a prefix to identify if incidents raised relate to the release. It is not always clear which incidents are related to release, however, when raised they go through a triage for the technical team to assess if linked. The prefix can then be amended to the correct one. There is then a Post Hyper Support Period, which is in place for six to eight weeks, dependent on the size and scale of the release. This enables issues to be raised by Social Security Scotland to be managed in conjunction with Programme. After this point, the management of outstanding issues will be handed to Social Security Scotland to manage, dependent on the type of issue. There is a oneweek handover period for this. After the Hypercare period the standard Social

Security Scotland Incident Management process is utilised to manage any incidents that occur.

- 3.1.3. The terms of reference for this review highlighted that review of regression testing would also be undertaken, however, this fell outside the remit of this review as responsibility for this sits within Programme. As detailed below the Digital Assurance Office (DAO) division within the Directorate for Internal Audit and Assurance has undertaken work in this area and Internal Audit will be placing reliance on this, rather than reperforming the work completed by this team.
- 3.1.4. In addition, Internal Audit previously undertook a review of Social Programme Management (SPM), the client management system used for the administration of benefits delivered by Social Security Scotland. Within this a recommendation was made in relation to the timescales in place around testing and the need to strengthen this process. The recommendation was accepted by management, with a proposed implementation date of March 2023. Follow-up work is planned at a future date where we will review action taken. As such, no further work was undertaken in relation to this as part of this review.
- 3.1.5. The Chief Digital Office Risk Register shows evidence of regular review and captures immediate risks to delivery, including those relating to release of rollout of new benefits/system upgrades. It is Internal Audit's opinion that this risk register is fit for purpose, adequately captures all risks, evidences regular maintenance, and demonstrates ongoing management and mitigation of risks and issues. Updates on risk through presentations are provided to the Chief Digital Officer. There is also a risk working group with a consistent and regular agenda and the attendee list represents an appropriate cross section of individuals across Social Security Scotland involved in Chief Digital Office.
- 3.1.6. There is a clear process in place for escalation of risks. Internal Audit found this to be a complex process, with checks and balances in place. However, the clarity supports appropriate escalation and management of these risks. Internal Audit is content that there is sufficient processes in place to identify and manage risks and issues relating to issues and updates to the system.

3.1.7. Due to issues occurring as a result of roll out of upgrades to the system, the Testing Team undertook some analysis on the issues to identify the key risks and how these can be managed effectively. During the review a number of findings were made, with recommendations identified to better support and manage roll out, as well as improving the response to any issues that occur as a result of these upgrades. It is Internal Audit's opinion that this demonstrates the team are being proactive in identifying risks and issues and in identifying ways to improve delivery and management.

#### Remit 2 - Incident identification, classification and management

- 3.1.8. The Social Security Scotland Major Incident Response Framework confirms the Major Incident Response Group and the key stakeholders responsible for implementing and managing the incident management process. This information is confirmed within the Problem Management process and within the draft Chief Digital Office Incident Management process.
- 3.1.9. Members of the Chief Digital Office Live Service Team meet with members of the IT Service Desk team on a weekly basis to discuss working arrangements between both teams and to identify improvements in relation to SPM. Actions from these meetings are monitored to ensure implementation.
- 3.1.10. Weekly team sessions are held by the Chief Digital Office Live Service team to allow for team support in managing and resolving complex incidents. This also allows for a discussion of best practice and areas for improvement.

#### Reporting and intervention

3.1.11. Root cause analysis is undertaken for major incidents and corrective actions are identified, tracked, and updated as part of monthly Chief Digital Office IT Service reports. Problem Reports are prepared to summarise the root cause analysis for major incidents, and these are shared with key stakeholders. The Chief Digital Office Major Incident Manager is undertaking analysis on the most common IT failures /incidents reported in order to develop and identify preventative measures with an aim of decreasing incidents/IT failures.

#### 3.2. Improvement Opportunities

#### Incident identification, classification and management

- 3.2.1. All major incidents raised through the Jira portal classified as Priority 1 (P1) incidents, trigger an organisational wide major incident response in line with the Major Incident Response Framework that is owned by the Business Resilience Team. Internal Audit found that:
  - The framework requires finalisation, review and sign off by all key stakeholders in the incident management process.
  - Biannual requirement for review is stated within the framework, with last review of the document recorded as 2021. Internal Audit has noted that some key personnel are no longer in post. (e.g. the named IT Service Desk Manager)
  - Localised incident response plans (Chief Digital Office Incident Management Process, Chief Digital Office Problem Management process, IT Service Desk Major Incident Identification process, Finance Incident Response process, etc) should be included in the framework as annexes to fully reflect the organisation's approach to incident management.
- 3.2.2. Internal Audit recognises that the Major Incident Response Framework covers all aspects of business recovery, not just that relating to major IT incidents. Internal Audit would recommend that the sections applicable to the management of major IT incidents be reviewed in full to ensure alignment with the management of P1 incidents. (Recommendation 01)
- 3.2.3. The Social Security Scotland Major Incident Response Framework highlights the prioritisation of activities while recovering from an incident. It also includes details of the teams that are instrumental in Social Security Scotland's ability to deliver benefits when recovering from an incident. However, at the time of our review, analysis to determine the activities and teams that should be given priority during disruption have not been identified. This is a gap that should be addressed to support delivery of priority activities during any disruption.

(Recommendation 01)

- 3.2.4. Guidance and documented processes for incident management arrangements are not always in place, formally reviewed and signed off. This includes:
  - The Chief Digital Office Problem Management process No evidence of formal review and sign off. The document refers to a 'Problem Board' which has not been established.
  - The Chief Digital Office Incident Management process Document details that this was last reviewed in 2019. Internal Audit notes that a review of this has now commenced, including supplementary documentation, such as templates.
  - The Chief Digital Office Live Operations Handbook and associated incident management guidance are still to be completed.
  - The IT Service Desk One Note included incident management guidance that differed to the versions provided to Internal Audit by the Chief Digital Office Major Incident Manager. Internal Audit also notes that the guidance on OneNote does not show evidence of review since 2020 and there is a risk that this does not reflect current processes.
- 3.2.5. It is Internal Audit's opinion that the current IT Service Desk process for identifying Major Incidents (P1 and P2s) requires improving. At the time of the review, there was no guidance in place for IT Service Desk administrators who triage incoming tickets, therefore Internal Audit is unable to comment on the effectiveness of the initial stage of the Incident Management process. Internal Audit would recommend that guidance is put in place to enable identification of major incidents in a timely manner. In addition, current system functionality does not allow for analysis of the number of users impacted by a particular outage. This would provide support in classifying incidents and would enable better communication to staff. (Recommendation 02)
- 3.2.6. There is no guidance available to all staff which details how Jira tickets are classified and prioritised. Management may wish to consider introducing an automated response once the ticket is allocated a priority, to provide assurance that the issue is being managed and to enable understanding of priority allocation. (Recommendation 02)

- 3.2.7. The Chief Digital Office Live Service Team currently pass resolved incidents/Jira tickets back to the IT Service Desk to be closed. As the IT Service Desk is currently managing large volumes of tickets, management should consider whether there may be a way for the Chief Digital Office Live Service Team to update and close incident tickets rather than creating a new ticket confirming resolution. (Recommendation 02)
- 3.2.8. Social Security Scotland have adopted the Scottish Government communications process guides. From our review of these guides, we note that these contain reference to the Scottish Government and do not reflect bespoke arrangements within Social Security Scotland. We also noted these process guides were not integrated into the wider Social Security Scotland Major Incident Response Framework and there was limited awareness and understanding of the processes outwith the Communications team. The Framework referred to a Major Incident Communications strategy, however, no detail was included in the annex. During our fieldwork we reviewed the Incident Lessons Learned tracker and this highlighted themes around delays in communicating issues and incidents to staff and stakeholders.
- 3.2.9. The communications approach/plan for managing incidents should be reviewed and updated to ensure that this reflects the needs of the Social Security Scotland. Management should ensure that key stakeholders are involved in agreeing the final approach. As part of the review, feedback and lessons learned from previous incidents in relation to communications should be considered. The final approach should be integrated into the Major Incident Response Framework and communicated to all those involved in incident management activities.
- 3.2.10. The plan/approach should make it clear who has responsibility for such communications, what their roles and responsibilities are, the means of communication to be used (e.g. lines to take, Interactive Voice Recording, Staff Communications, Group Call, ministerial messaging, social media, mygov website, etc.), the route for agreement and sign off and timescales for communicating.

(Recommendation 03)

#### Reporting and Intervention

- 3.2.11. The process for gathering lessons learned is embedded in the Major Incident Management Process and while lessons learned and corrective actions are identified on multiple levels within the organisation, the processes in place suggest silo working and lack of coordination. There is currently no working group/panel in place to scrutinise efforts and ensure that any corrective actions identified are appropriately prioritised and actioned. We note that this weakness has already been identified by the Business Resilience Manager and escalated to the Agency Leadership Team. Internal Audit would recommend that processes be implemented to centralise this process. (Recommendation 04)
- 3.2.12. Reporting processes are still being developed and are currently manual, time consuming and prone to human error with only some dashboard reporting available through the existing Chief Digital Office IT Service Desk management systems. This impacts the ability to obtain information efficiently and effectively. A review to determine whether current reporting output is fit for purpose has not been completed. This was highlighted in the Internal Audit review of IT Supply in 2022, therefore a formal recommendation will not be made here.
- 3.2.13. Post Incident reports, Incident Logs and Lessons learned/feedback forms are prepared by Officers in Charge for all Major Incidents. These are collated by the Business Resilience team. As part of our fieldwork, we tried to obtain evidence that for a sample of incidents the required documentation had been completed and processes appropriately actioned with lessons captured and actions taken to progress and implement these, however, due to lack of a tracker or other relevant process, we were not able to review and therefore cannot confirm that in all cases the required documentation and activities are completed as required. (Recommendation 05).



# Annex A Definition of Assurance and Recommendation Categories

#### Assurance Levels

| Substantial Assurance<br>Controls are robust and<br>well managed         | Risk, governance and control procedures are effective in<br>supporting the delivery of any related objectives. Any<br>exposure to potential weakness is low and the materiality<br>of any consequent risk is negligible. |
|--|--|
| Reasonable Assurance<br>Controls are adequate but<br>require improvement | Some improvements are required to enhance the adequacy and effectiveness of procedures. There are weaknesses in the risk, governance and/or control procedures in place but not of a significant nature.                 |
| Limited Assurance<br>Controls are developing                             | There are weaknesses in the current risk, governance<br>and/or control procedures that either do, or could, affect<br>the delivery of any related objectives. Exposure to the  |
| but weak   | weaknesses identified is moderate and being mitigated.   |

## **Recommendation Priority**

| High   | Serious risk exposure or weakness requiring urgent consideration.         |  |
|--------|---|--|
| Medium | Moderate risk exposure or weakness with need to improve related controls. |  |
| Low    | Relatively minor or housekeeping issue.                                   |  |

Annex B – Terms of Reference



# **Directorate for Internal Audit and Assurance**

# **Internal Audit Terms of Reference**

# **Social Security Scotland 2022-23**



**Directorate for Internal Audit and Assurance** 

Issue Date: 28-09-2022

# Key Audit Contacts

| Audit Year:                            | 2022-23   |  |
|--|---|--|
| Client Accountable Officer:            | David Wallace, Chief Executive                                  |  |
|  | [Redacted], Head of Change and Project Management               |  |
|  | [Redacted], Live Service Manager                                |  |
|  | [Redacted]Live Service Manager                                  |  |
|  | [Redacted], Project Management Office Manager                   |  |
|  | [Redacted], Acting Head of Change and Project Management        |  |
|  | [Redacted] Head of Change & Project Management                  |  |
|  | [Redacted] Change Manager                                       |  |
|  | [Redacted] Head of Business Change Management                   |  |
| Client Audit Contact(s):               | [Redacted] Business Resilience Manager                          |  |
|  | [Redacted] Fraud and Error Systems and Process Lead             |  |
|  | [Redacted] Social Security Directorate Programme Change Service |  |
|  | Manager   |  |
|  | [Redacted] Social Security Directorate Programme Delivery lead  |  |
|  | [Redacted] Social Security Directorate Programme Test manager   |  |
|  | [Redacted] Social Security Directorate Programme Delivery       |  |
|  | [Redacted], Social Security Directorate Head of Release         |  |
|  | Management, Transition & Lessons Learned                        |  |
| Lead Senior Internal Audit<br>Manager: | [Redacted]  |  |
| Internal Audit Manager:                | [Redacted]  |  |
| Internal Auditor                       | [Redacted]  |  |

# **Estimated Reporting Timescale**

|  | Fieldwork Starts:        | September 2022 |  |
|--|--------------------------|----------------|--|
|  | Fieldwork Ends:          | October 2022   |  |
|  | Draft Report Issued:     | November 2022  |  |
|  | Final Report Issued:     | November 2022  |  |
|  | Estimated Resource Days: | 30             |  |
|  |                          |                |  |

### 1. Introduction

- 1.1. This internal audit review forms part of our planned audit coverage set out in our Annual Internal Audit plan issued on 25 March 2022 and agreed by the Accountable Officer and noted by the Audit and Assurance Committee.
- 1.2. We have been advised by management that Social Security Scotland has recently encountered a number of incidents in relation to SPM, some of which were as a result of new releases having an impact on live benefits already being delivered. New releases include the introduction of new benefits as well as change and development activity. In each instance Social Security Scotland has had to manage the incident and take action to remedy the situation. Each incident has had an impact on teams across the organisation where business continuity actions have had to be taken, putting colleagues under increased pressure and having to deviate from their usual activities in order to ensure continued delivery and payment of benefits to clients. As such we propose to undertake a review to assess the pre-release arrangements, including consideration of regression testing and controls around non-production environments which are used, the impacting and acceptance process of testing outcomes prior to release, in relation to currently live benefits (excluding Adult Disability Payment), the post release incident management arrangements and the lessons learned activities in order to identify root cause of such issues and minimise the likelihood of them happening again.
- 1.3. The Social Security Scotland Strategic Risk Register includes the following risk:
  - IF there is no formal Business Continuity Management System in place THEN any incident that requires its plans to be invoked will depend on reactive management to resume services RESULTING IN significant reputational damage, impact to client service delivery, impact on health, safety and wellbeing of our people, significant financial implications and failure to meet statutory obligations.
  - IF appropriate Change Control/Change Management (as a function)
     processes are not in place THEN we may fail to land new benefits safely,

assess impact on current benefits and fail to influence future launches RESULTING IN financial loss and missed/delayed client payments leading to sub-optimal staff and client experience.

1.4. We met with [Redacted] Head of Change and Project Management; [Redacted] Project Management Office Manager; [Redacted], Live Service Manager and [Redacted], Social Security Scotland Corporate Assurance Team, on 25th July 2022 to discuss relevant risks and agree the details of this review. Our key risks below have been developed through these discussions and our knowledge of Social Security Scotland and its objectives.

### 2. Scope

- 2.1. To evaluate and report on the controls in place to manage the risk surrounding Social Security Scotland's Incident Management arrangements.
- 2.2. Remit Item 1 Pre release governance arrangements To assess whether Social Security Scotland has established appropriate governance arrangements for the consideration, impacting, acceptance and signoff of risks and issues identified as part of pre-release testing and that mitigating action has been implemented as part of Social Security Scotland's readiness activities prior to new releases going live on SPM.

### Key Risks:

- A failure to establish appropriate acceptance and sign off procedures prior to release leading to mitigating processes and controls not being developed and implemented prior to releases resulting in Social Security Scotland not being ready and live benefits being negatively affected.
- Lack of arrangements for understanding the impact of system deficiencies/weaknesses, leading to an inability to make an informed decision as to whether Social Security Scotland is ready and prepared for such impacts and able to accept the update in its current form.
- Insufficient processes established for recording and managing risks and issues inherited as a result of the go live of new benefits, change activity or system updates that have deficiencies/weaknesses.

2.3. Remit Item 2 – Incident Identification, classification and management

To determine if the systems, processes and controls are appropriate for identifying and classifying issues as incidents and the processes for managing such incidents through to recovery.

Key Risks:

- Process for identify issues and appropriately classifying incidents is inefficient or ineffective leading to incidents not being suitably prioritised and managed and corrective action not being taken in a timely manner.
- Social Security Scotland does not have effective processes for managing such incidents impacting the organisations ability to continue to deliver benefits resulting in poor service delivery, financial hardship of clients and reputational damage.
- Appropriate colleagues are not involved in the incident management activities or aware of the recovery actions required leading to inconsistent/inefficient incident management approach and an inability to effectively recover.
- Social Security Scotland does not have the capacity and/or capability and has
  insufficient support to understand what is impacted in such incidents, identify
  a solution and implement this resulting in Social Security Scotland being able
  to effectively manage such incidents and recover leading to an inability to
  achieve strategic objectives and deliver services.

#### 2.4. Remit Item 3 – Reporting and intervention

To assess the processes and controls in place to report incidents to relevant teams within Social Security Scotland to ensure any action required to resolve and correct benefit processing and payment administration is understood, impact known and action taken.

Key Risks:

- Failure to report incidents for corrective action resulting in clients not obtaining benefits they are due, increased financial loss due to overpayments not being rectified in a timely manner and reputational damage.
- Lack of process to understand impact of corrective actions and the resulting impact on the teams responsible leading to failure to achieve team and

business objectives resulting in diminished service levels and poor quality output impacting client satisfaction and reputation.

• Lessons are not learned, captured and communicated resulting in the same issues recurring.

### 3. Approach

- 3.1. We will undertake the audit in compliance with the Internal Audit Charter and the Memorandum of Understanding agreed between Internal Audit and Social Security Scotland.
- 3.2. Due to current Scottish Government remote working requirements, this review will utilise eRDM Connect for sharing documents and screen sharing technology as necessary. It has also been agreed that some elements of fieldwork would be done onsite. Methods of undertaking fieldwork will be amended as appropriate.
- 3.3. Management are reminded of our need for timely access to people and responsiveness to information requests, to enable the reporting timetable to be met.
- 3.4. At the conclusion of the audit a customer satisfaction questionnaire will be issued to the main client audit contact. Internal Audit appreciate feedback and to facilitate continuous improvement, we would be grateful if you could complete and return the questionnaire.

