

Update on Swindon Borough Council's Connect to Government Connect

Audit Committee

Date: 23rd June 2009

Author: Group Director, Business Transformation

Parish / Wards Affected: None

Purpose

- To update Members on the current position of the Council's connection to Government connect.

Recommendation

Audit Committee is requested to

- Consider the information within this report

1. Reasons

- 1.1 At its meeting on 27 January 2009, the Head of Internal Audit submitted a report presenting the Internal Audit report on the project for the Council to join the Government Connect Secure Extranet (GCSx). The project had been identified as of 'significant risk' to the Council.
- 1.2 The Committee asked that the Head of IT identify by, 13th February 2009, which Councillors have email forwarding in place, and arrange for alternative arrangements, including training on Citrix where appropriate.
- 1.3 The Committee also asked that the Director of Law and Democratic Services send a copy of the Audit Report to the Leader of the Council highlighting the Committee's concerns at the timescales for implementation of the Government Connect Secure Extranet and the risks involved.
- 1.4 It is the purpose of this report to update Members on the current position of the Council's connection to Government connect.

2. Detail

Background

- 1.1. Government Connect is a central government programme run by the Department of Works and Pensions (DWP). The objective of the programme is for all Local Authorities (LA) to be connected to each other and central government by a secure network. A number of other support

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services will be provided via this secure network including a secure email service and a secure bulk data transfer service.

- 1.2. DWP has stated that information sharing with them must be via the Government Connect Network (GCSx) by the 30 September 2009.
- 1.3. Before any LA can connect to GCSx it must complete a Code of Connection (CoCo). The CoCo contains 91 security controls that have been defined by GCHQ and a local authority must state their compliance with these controls. The CoCo is then assessed by a DWP appointed assessor to give an overall view of the security risk a LA represents and a recommendation to allow the LA to connect. Typically a LA will go through the assessment process 4 times before a connection is allowed.
- 1.4. The CoCo takes a risk adverse approach. It places high emphasis on theoretical technical risk rather than business need. As an example it requires two anti-virus products from different suppliers to be used rather than two from the same supplier. Whilst this addresses a risk that a virus could be missed by two products from the same supplier it results in a more expensive solution as multi-product discounts from software vendors cannot be taken. The CoCo therefore is easier for some LAs to comply with than others and does not always reflect the organisations IT competency.
- 1.5. There is a five stage process that a local authority has to complete to connect to GCSx
 1. Submit GCSX Proforma, to obtain a physical connection
 2. CoCo informal review & consultancy
 3. CoCo Formal Assessments
 4. Submit contracts. CoCo approval & circuit activation
 5. Complete local configuration.

Swindon is currently at Stage 3.

- 1.6. The impact of missing the September 2009 deadline is that the DWP will no longer share information with Swindon. This will seriously limit our ability to deliver our Benefits service.

Progress to Date

- 1.7. We have taken the approach of addressing Government Connect as part of the Council's programme of work to improve information security as a number of the actions required are also required to meet other security

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based requirements such as the Payment Card Industry Data Security Standard and our connection with the NHS Network.

- 1.8. The New Ways of Working (NWoW) programme will also put new emphasis on information security for Council staff. As we change our working practices to be more flexible the risks of a loss of sensitive information will also change and our response to those risks will also need to change. We have therefore linked the engagement with users for Government Connect to that of New Ways of Working to maximise the change in culture around information security.
- 1.9. Our CoCo has been submitted for assessment twice. The feedback from our first iteration was that it has relatively few issues compared to other local authorities with 38 points of clarification in total. The majority of these have been addressed in our second submission.
- 1.10. Specific activity that has been completed since we reported at January's Audit Committee are:
 - Project Sponsor and Lead have been identified (David Titcombe = Head of IT and Michael Bruton – Business Architect respectively)
 - We agreed an extension to our connection date from 1 April 2009 to the 30 September 2009.
 - An Information Security Forum established made up of subject matter experts and chaired by the Director of HR and Change to advise Operations Board on information security risk and ways to mitigate that risk.
 - A physical data connection has been installed at our data centre in West Malling.
 - We are working on our third CoCo submission and have submitted our CoCo for formal assessment twice
 - We have commissioned independent network penetration tests of our network.
 - A funded project has been started to deliver a new email solution for the Council that has secure GCSx email as part defined deliverable.
 - Project Management has increased to recognise the complexity of the project. Both SBC and Capita have project management resource allocated to the project.

Management of Previously Identified Risk

- 1.11. We identified four main areas of concern with the project. We have been actively managing these risks.

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- 1.12. Physical Security of Equipment was a concern as we have 154 sites with network links. DWP consider each of these sites to be a potential risk to network security. We believe we have answered these concerns in our second CoCo submission.
- 1.13. The way our Mail Servers collect email was none compliant with the control within the CoCo. This has now been addressed with funding being agreed to upgrade our email platform to one that is CoCo compliant.
- 1.14. Email Forwarding has been addressed in two ways. Initially we will not give access to GCSx mail to users who require email forwarding. In the medium term we will design a solution to remove the need for email forwarding as it present a general information security risk and not just a barrier to Government Connect implementation.
- 1.15. User Access: In our last report we stated that we would see dispensation from DWP for our business need for generic user accounts. This dispensation has been accepted in the response to our first CoCo assessment.

Project Risks

- 1.16. The largest risk to the project being delivered on time is the view DWP take of the data security arrangements in Capita's Data Centre. The Data Centre is shared by multiple customers in line with industry practice. Customer's data is separated and secured by use of a technology called Virtual Local Area Network (VLAN). Initial CoCo assessments have revealed that DWP consider this to be a risk so a negotiation is taking place on how that risk should be mitigated. This could be relatively inexpensive steps like additional firewall rules. However it may require more expensive and time consuming requirements like encrypting all Swindon network traffic in the data centre or Swindon having its own network put in place within the data centre. Whilst this risk has a high impact, we believe at this stage that the likelihood is low, It should be remembered that Capita's Data Centre is considered highly secure having gained ISO 27001 and PCI DSS

Plan to Completion

- 1.17. The critical path to project completion is:

Work Item	Target Date
Third CoCo Submission	1 July 2009
Fourth CoCo Submission	20 July 2009
Final Solution Design Complete	1 August 2009

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Firewall Installation at West Malling	17 August 2009
Email Service Configuration	17 August 2009
Testing	31 August 2009
User Training	31 August 2009
Service Go-Live	7 September 2009

1.18. The plan assumes that four CoCo iterations will be necessary. This is not something that can be specified exactly as the CoCo submission process is an ongoing dialog until the assessor is able to recommend our connection to the GCSx network. The detail project plan has some flexibility built in due to the iterative nature of the CoCo process. Detail changes significantly before and after each submission.

1.19. The email service configuration will be part of the larger project to replace Swindon's Email platform so there is a dependence on this project.

Risk Management

Financial and Procurement Implications

- The project is currently fully funded from £60k that was approved as part of the recent IT investment approved by Special Committee on the 29/05/2009

Legal / Human Rights Implications

- Internal Audit is a statutory requirement of the Accounts and Audit regulations 2006. The Internal Audit service also provides assurance to the Director of Finance regarding the requirements of Section 151 of the Local Government Act 1972.

Links to Corporate Plans and Policies (in particular to Swindon 2010 Promises)

- Government Connect will affect the way we deliver our Benefits Service so links to Promise 4 and the Community Strategy Section 4

Consultees

- The Director of Finance (Section 151 Officer) and Director of Law and Democratic Services (Monitoring Officer) are consulted in respect of all reports.
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Background Papers and Appendices

- None