

Executive Summary

1. As part of our 2004/05 audit we have carried out an overview of the Council's website.
2. The main aims of our audit were to ensure:
 - the website supports corporate strategy by providing suitable services and presenting an appropriate public image;
 - the organisation follows best practice with regard to publication, accessibility and protection of privacy;
 - that responsibilities for maintenance are clear, change controls are in place and that publication is properly checked and authorised; and
 - that the organisation has an adequate program in place to identify and mitigate the risk of security incidents.

Conclusion

3. Overall, we found that the website includes details of Council services and encourages interaction between the citizen and the Council. We found that the website offered many one-way transactions and several two-way transactions (forms returned electronically, e-mail response etc) are beginning to be implemented on the website.
4. The Society of Information Technology Management (Socitm), the professional association for ICT managers working in and for the public sector, published in February 2005 a report on websites¹ which covered all Scottish local authorities. Socitm concluded that the Council's website provides "content and encourages some interaction". We found evidence that the services available from the Council's website has improved since this survey.
5. Our review identified several areas where further improvements to the management and operation of the website could be made. A summary of these is included below with details included as part of the action plan at section 2.

Main audit findings

6. The main areas for improving the management and operation of the website include the following:
 - the Council should develop a formal web strategy;
 - the website terms and conditions section is difficult to locate and should be moved to a obvious location;
 - the data protection policy available on the internet should reflect the 1998 Act not the 1984 Act; and

¹Better connected 2005 - A Socitm Insight Publication– Available from the subscriber section of the Socitm website - <http://www.socitm.gov.uk/public/default.htm>

- Guidance should be produced and given to the Web Authors outlining the changes and ways to avoid releasing confidential data and information inadvertently.

Management action

7. Detailed recommendations on those areas where controls could be improved are noted in the action plan that follows. The action plan also describes under the 'risk exposure' column the possible consequences of our audit finding. The factual accuracy of the report and the timescales for implementing our recommendations has been agreed with officers.
8. This report to management sets out our findings from the review carried out. The weaknesses outlined are only those which have come to our attention during the course of our normal audit work and are not necessarily, therefore, all of the weaknesses which may exist.
9. Although we include a number of specific recommendations in this report to strengthen internal control, it is the responsibility of management to determine the extent of the internal control system appropriate to the Council. We would stress, however, that an effective internal control system is an essential part of the efficient management of any organisation.
10. The assistance and co-operation we received during the course of our audit is gratefully acknowledged.

Section 2 – Action Plan

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
1	The Council recognises the website's importance as a method of communicating with citizens. Major website developments are submitted to the Strategic Management Team for approval. Progress is reported back using quarterly service reports. Presently, an overall web strategy for Council does not exist.	Haphazard development of the website with no real objective, may lead to inefficient developments and poor usage by the citizens.	The Council will develop their web strategy and obtain formal approval for its strategic direction. Priority : High	Action: Strategy to be developed and approved as part of the service planning process Responsibility: Communications Manager Date: February/March 2006	This recommendation remains on target to be completed by the agreed implementation date.

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
2	<p>Accessibility of websites relates to the ability of a website's visitor to access all elements of the site, immaterial of the devices they use to interface with the website. The website should be equally accessible by all visitors.</p> <p>The Council has recognised the requirement to develop a website that is usable by the disabled. The Council had adopted a suitable accessibility standard and working towards full compliance with it.</p>	<p>A visitor to the website can make a claim against the Council if the website makes it impossible or unreasonably difficult to access information and services. If the Council has not made reasonable adjustments and cannot show that this failure is justified, then the Council may be liable under the Disability Discrimination Act 1995, and may have to pay compensation and be ordered by a court to change the website.</p>	<p>The Web Team has identified the necessary tasks to ensure that the website complies with the standard. We recommend that this project work is completed and regular checks scheduled to ensure that the website continues to comply with the chosen standard.</p> <p>Priority : High</p>	<p>Action:</p> <p>Accessibility Project Plan 70% complete (W3C WCAG level A status achieved Jul 05) - following actions remain:</p> <ul style="list-style-type: none"> • Level AA Templates to be live end Aug 05 • Level AA manual testing / amendments Sep 05 • Accessible Content Management Guidelines and Procedures in place end Sept 05. • AA Accessibility status achieved end Oct 05 <p>Responsibility: Web Team</p> <p>Date: Total finish end Oct 05</p>	<p>Progress is being made with the recommendation and it is on target to be completed by the agreed implementation date.</p>

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
3	<p>It is Council policy to use plain English and they should recommend and encourage that it is used where applicable.</p> <p>Many website authors have received training in plain English.</p>	<p>Not using plain English can make the web pages difficult to read.</p>	<p>The Communications Manager will remind Web Authors to use plain English for the website content.</p> <p>The Council will consider ensuring that all Web Authors are trained in plain English.</p> <p>The Web Team will consider testing some of the web pages to ensure that they meet the Plain English guidelines.</p> <p>Priority : Medium</p>	<p>Action:</p> <p>Key Communications staff already received “writing for Internet training”</p> <p>“Writing for the Internet” Guidelines already available</p> <p>Plain English guidelines available for Web Authors with option for a training course</p> <p>Responsibility: Communications Manager</p> <p>Date: End Dec 05</p>	<p>Implementation of the agreed recommendation is currently being carried out and will be implemented by the agreed date.</p>

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
4	<p>The Web Team has checked the operation of the website using Microsoft Internet Explorer only. No checks against other common browsers, for example Mozilla FireFox and Apple Safari or Opera have taken place.</p>	<p>Web browsers can present the same web page differently. The difference can vary from purely cosmetic, i.e. a small change in colour, to a major change, which makes the web page on it readable. Many users are using non-Microsoft products. Recent surveys indicate that less than 90% of internet users use Microsoft Internet Explorer to browse the web. Therefore, the Council risk alienating a small but growing percentage of potential website users.</p>	<p>The Web Team will check the website operation by using other browsers.</p> <p>Priority : High</p>	<p>Action: Accessibility "AA" templates have been tested against commonly used browsers – Firefox, Internet Explorer, Netscape & Opera - website viewed and accessed successfully.</p> <p>Other browsers will be tested as part of Accessibility plan.</p> <p>Responsibility: Web Team</p> <p>Date: End Oct 05 (as Accessibility plan completion)</p>	<p>Progress is being made with this recommendation and is on target to be completed by the agreed implementation date.</p>

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
5	The website includes a page on the terms and conditions. The terms and conditions section covers copyright, privacy and data protection issues among others. Terms and conditions can help avoid disputes and problems that may arise between the website operator and the user. Currently, the terms and conditions page is difficult to find and is hidden away within the website.	Users that are unable to find the terms and conditions can effectively ignore them.	Set-up will link it to the terms and conditions page from all the web pages on the website. It should be possible to modify in the web page template to ensure that the terms and conditions page is located in a highly visible place. At the very least it must be clearly visible from the home page. Priority : High	Action: Link to Terms and conditions is will be clearly visible from the home page and heading on all site pages. Responsibility: Web Team Date: End Sep 05	This recommendation remains on target to be completed by the agreed implementation date.

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
6	<p>The Council has made available electronically many documents listed in this the Freedom of Information Publications Scheme. These included the Data Protection policy.</p> <p>We note that the policy did not cover the latest Data Protection Act, which was passed in 1998.</p> <p>In particular,</p> <ul style="list-style-type: none"> • The policy was approved in that 1997 - year before the current Act was passed; • The position of Data Protection Commissioner was replaced by the Information Commissioner in the 1998 Act; and • The principles listed in the policy refer to those listed in the 1984 Act not in those the 1998 Act. 	<p>Posting out of date information on the website reflects badly on this website operator.</p>	<p>The Data Protection Policy will be updated to reflect the Data Protection Act 1998 Act.</p> <p>Priority : High</p>	<p>Action: Remove document Replace with current policy</p> <p>Responsibility: Communications Manager / FOI Administrator</p> <p>Date: End Oct 05</p>	<p>Progress is being made with this recommendation and is scheduled to be complete by the agreed implementation date.</p>
August 2005			8	Audit Services-Audit Scotland	

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
7	Within the terms and conditions web page is a section clearly indicating that the Council are not responsible for the content of external websites.	Users believe that the content of the external site meets Council approval and that reflects Council policy.	<p>Include a brief statement stating that the Council is not responsible for the contents of external web links positioned near all external web links.</p> <p>Priority : Medium</p>	<p>Action: Suitable statement to be included on the footer of every web page and within “see also” section which is relevant to links.</p> <p>Responsibility: Communications Manager</p> <p>Date: End Sep 05</p>	The recommendation is on target to be completed by the agreed implementation date.

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
8	The Web Team does not offer any guidance to ensure that confidential information is not revealed via the website.	Many file formats, including Word, Excel PowerPoint, and Adobe Acrobat to name a few, store copies of previous versions of the same file. In many cases, it is possible for users to access the previous versions. This can reveal confidential information. Many high profile organisations in both public and private sectors have inadvertently released confidential information in this manner.	<p>The Web Team will publish guidance to the Web Authors on the dangers of releasing confidential information via website including steps on how to minimise this risk.</p> <p>The Web Team will check documents currently available from the website to ensure that no confidential information is inadvertently released.</p> <p>Priority : High</p>	<p>Action:</p> <ol style="list-style-type: none"> 1. Guidelines formalised for Web Authors 2. Plan formed to check currently published documents <p>Responsibility: Web Team</p> <p>Date: End Dec 05</p>	Progress is being made with this recommendation. It is on target to be completed by the agreed implementation date.

No.	Audit Finding	Risk Exposure	Recommendation	Action Responsibility and Date	Progress as at the 18 th of August 2005
9	<p>Disaster Recovery tests were conducted by the web server. The outcome of these tests resulted in two actions:</p> <ul style="list-style-type: none"> External web server backup is changed to allow a successful restoration of the server. This restoration is required to be verified as soon as possible. External web server application restoration documentation will be created or modified as appropriate; verified by further testing. 	<p>The disaster recovery tests identify two issues, which need addressing. By addressing these issues, the ICT department should be able to restore the website from backup.</p>	<p>The ICT Department will complete the already identified actions necessary to be able to recover the website from backup.</p> <p>Priority : Medium</p>	<p>Action:</p> <ul style="list-style-type: none"> a) Develop improved technical approach to web server backup b) Develop restore documentation c) Following a) and b) full restore to a new live server environment will be undertaken as part of server consolidation project <p>Responsibility: ICT Applications Manager</p> <p>Date: End Nov 05</p>	<p>The agreed action and date are currently being progressed; management will provide confirmation of progress for the next Audit Committee.</p>