

Glasgow City Council Internal Audit Section

Committee Summary

Service – Education Groupcall Review

Item 4(c)

21st May 2025

1

1 Introduction

- 1.1 As part of the agreed Internal Audit plan we have carried out a review of the use of Groupcall Messenger (Groupcall), a school communication system used across the Education Services (EDS) estate. The platform is supplied by Community Brands UK Limited (CBUK).
- 1.2 Groupcall is a web-based service that provides a secure platform for sharing updates and notifications to parents, staff and students. The system synchronises with the school's Management Information System, SEEMIS, and allows schools to send targeted messages to relevant user groups.
- 1.3 The system allows users to send personalised text messages, emails, voice calls and push messages. Recipients can also respond directly to schools. The system also allows messages to be scheduled in advance, so they are received at a suitable date and time.
- 1.4 The *messenger form* module within the system helps negate the need for paper forms including parental surveys and parent's evening bookings, reducing administrative tasks.
- 1.5 We have been advised that the use of the communication tool has led to increased attendance and reduced unauthorised absence, providing an early alert if a child fails to arrive at school. However, there have been instances where human error has resulted in information being sent to the wrong recipients.
- 1.6 The scope of the audit was to ensure there are sufficient and appropriate controls in place to manage the use of Groupcall and minimise the risk of data breaches. The scope of the audit included the key controls in the following areas:
 - System manuals and user guides, including staff training and awareness;
 - Data privacy and security policies;
 - User access and permissions management;
 - Audit trails;
 - Error and exception reports;
 - Business continuity arrangements, and
 - Data integrity.

2 Audit Opinion

- 2.1 Based on the audit work carried out a **reasonable** level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and **three** recommendations which management should address.

3 Main Findings

- 3.1 The key controls are in place and generally operating effectively. System user manuals and administrator procedures for the Groupcall system are documented and easily accessible to staff on the Glasgow Online intranet.
- 3.2 An annual GOLD Information Security and Data Protection training course is required to be completed by all staff. Completion of this is monitored by the Information Security and Integrity Board and EDS management. EDS has undertaken a training needs assessment and following this, CBUK has developed a customised training programme with a data breach focused agenda. Additionally, digital bulletins are issued to all staff to reinforce the use of procedures and guidance.
- 3.3 We selected samples of user system access reports per school and confirmed that the set profiles were aligned to the user's assigned roles.
- 3.4 Groupcall includes an inbuilt preview of messages to ensure that content and attachments are appropriate before dispatch, to help prevent messages being sent to the wrong recipient or with incorrect information. An audit trail is maintained, which provides the status of sent messages.
- 3.5 A data breach reporting procedure is applied when managing data breaches in school establishments and heads of establishments have the responsibility for submitting a data security incident report form should a breach occur. We sampled data breaches that have been reported to the data breach team and confirmed that these were completed in a timely manner.
- 3.6 Our audit testing also identified some opportunities for improvement. A sufficient level of detail was documented within the supplier's procedures, however the Council's procedures are limited in the references to Groupcall. The Groupcall system has built-in steps to allow a second user to review messages and attachments, however, the Council does not have guidance over when and if this feature should be used.
- 3.7 Some other issues were identified during the audit relating to user access and these have been shared with the Service.

- 3.8 School clerical staff are created as administrators centrally by EDS. The clerical staff in establishments then create users in the locations and manage communication through Groupcall. Clerical staff are responsible for ensuring that they review access for users they have created and remove users from Groupcall. However, leavers are not being removed at an establishment level on a regular basis. CBUK is responsible for removing EDS headquarters staff. Our review identified some current users have not accessed the system for several years and have not been removed.
- 3.9 An action plan is provided at section four outlining our observations, risks and recommendations. We have made three recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	0
Medium	Less critically important controls absent, not being operated as designed or could be improved.	3
Low	Lower level controls absent, not being operated as designed or could be improved.	0
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	0

- 3.10 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.11 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.12 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Procedures and standards are sufficiently detailed and include all activities and controls.				
1	<p>Although the Groupcall system has the ability for a second user to review messages and attachments, the Council does not have guidance over when and if this feature should be used. We have been advised that significant administration burdens are associated with authorisation, hence all messages including those of a sensitive nature currently lack authorisation.</p> <p>Lack of clarity in the procedures may result in an increased risk of tasks not being completed or being undertaken incorrectly.</p>	EDS management should consider if a second line review could be implemented for messages that are known to contain sensitive personal data. If this is implemented EDS should also review the procedures to ensure they include when messages should be authorised.	Medium	<p>Response: Accepted</p> <p>Education has considered implementing second user reviews within Groupcall for messages containing personal and sensitive information. However, discussions with the vendor have confirmed that this would require all messages to be approved by the Head Teacher and the additional administrative burden would be onerous. Education has put in place other mitigating measures, clerical will always quality assure recipients of messages and content of messages at all times and Groupcall will only be used for confidential, personal and sensitive information where this has been instructed by a member of the school management team. Digital Focus sessions are currently being held across the city to reinforce these messages.</p>

No.	Observation and Risk	Recommendation	Priority	Management Response		
				Officer Responsible for Implementation:		
				Education Support Manager		
				Timescales for Implementation:		
				8 th May 2025		

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Appropriate controls are in place to secure accounts for systems that can be accessed remotely.				
2	<p>Although Groupcall access is limited to only authorised users, it is cloud based, and users can login remotely. We identified an area where access controls could be strengthened and we provided further details to the Service.</p> <p>Without appropriate user access controls there is an increased risk of user accounts being used to gain unauthorised access to sensitive data.</p>	EDS should liaise with the supplier to determine if the access controls in place could be further strengthened.	Medium	<p>Response: Accepted</p> <p>It was confirmed, by Groupcall, that additional access controls are currently in development and will be available to Education Services soon. The Administration and Business Support Team will support any requests to help implement this new process when it becomes available.</p> <p>Officer Responsible for Implementation:</p> <p>Education Support Manager</p> <p>Timescales for Implementation:</p> <p>Education Services is awaiting an update from Groupcall as it appears the introduction of this process is imminent. Provisional timescale of 31st August 2025.</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Leavers and movers are removed from the system in a prompt manner to minimise the risk of unauthorised access.				
3	<p>The supplier, CBUK, is responsible for creating accounts for EDS staff who require to access all schools. It was identified that access for a group of centrally employed staff who were initially added to Groupcall for a specific purpose, was no longer required but had not been removed.</p> <p>We have been advised that CBUK is in the process of completing the removal of historical users in addition to the centrally employed staff, but this now needs to be completed on a school by school basis.</p> <p>Furthermore, leavers are not being removed at an establishment level on a regular basis. Education has advised that reminders have been sent to all schools and in the future, the team will commence spot checks.</p> <p>If users are not removed in a timely manner, there is an increased risk that individuals who no longer require access can view personal information within Groupcall or send messages.</p>	EDS should continue to liaise with the supplier to ensure that the historical users are removed from the Groupcall system as soon as possible. EDS should also introduce sample checking of users within establishments to ensure leavers have been removed in a timely manner.	Medium	<p>Response: Accepted</p> <p>The importance of Groupcall User lists being maintained and only available for access to current users is acknowledged.</p> <p>In conjunction with Groupcall and school staff, a citywide exercise has been undertaken to remove all users who no longer require access to Groupcall.</p> <p>The Digital Team has also reinforced this must be an ongoing essential task for clerical staff in schools i.e. they must review their user list and remove any non-current users. They also have a responsibility to review and maintain these lists on an ongoing basis.</p> <p>A reminder request will be sent to all appropriate staff. A presentation is being delivered to all clerical across the city in May 2025 and will be posted on Education's Business Support 's Digital page.</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
				<p>Peer Support staff will also carry out spot checks with clerical to ensure these lists are being maintained on school visits.</p> <p>Officer Responsible for Implementation:</p> <p>Education Support Manager</p> <p>Timescales for Implementation:</p> <p>31st July 2025</p>