[redacted]

[Minute]

[redacted]

Date: 14 October 2016

[redacted]

[redacted] our understanding of the environment is not as complete as we would wish. [redacted]

4. Correctly calibrating our level of concern/response about the *[TE]* while recognising the effort and progress made in a number of areas is especially challenging. However, overall in my view the current level [redacted] is still not acceptable. [redacted]

[redacted]

[redacted]

6. *[Sets out suggestions to substantially reduce these risks]* –

[redacted]

8. I have been asked to carry out a review of the *[TE]* based on the following terms of reference –

"I will report to the *[TE steering group]* , *[four directors]*

[redacted]

Summarise the key risks/issues generated by *[TE]*, their scale and (for risks) proximity.
Review current mitigation plans [redacted]

[redacted]

'his page is redacted]

003

[redacted]

[redacted]

15. *[There are difficulties in understanding the true nature of the risks]* [redacted]. However, I believe that it is actually possible to focus on [redacted] –

[redacted]

2. A high likelihood of relevant material not being discovered, or being discovered when it should have been deleted, in a disclosure exercise leading to substantial legal or oversight failure.

[redacted]

[REDACTED]

Risk 1 – [redacted]

[redacted]

[redacted]

Risk 2 – Following a major compliance failure based on information held in *[TE]* a substantial review and action plan sought to remedy the IM risks inherent in the system. This made significant progress and concluded with partial mitigations of some key areas of risk. It then sought to switch to a focus on preventing future issues. [redacted]

However, I do **not believe that enough has been done to ensure that this 'legacy' risk doesn't** <u>increase</u> and resolution of identified issues feels as though it is stalled (see below for specific recommendations).

[redacted]

[redacted]

C. Knowledge – [redacted] In the context of Information Management our limited understanding of what is on the system means that we are unable to apply effective review, deletion and discovery techniques. [redacted] – [redacted]

[redacted]

[The following pages are redacted]

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