

Report of the Chief Audit and Control Officer**INTERNAL AUDIT PROGRESS REPORT**1. Purpose of report

To inform the Committee of the recent work completed by Internal Audit.

2. Detail

Under the Council's Constitution and as part of the overall corporate governance arrangements, this Committee is responsible for monitoring the performance of Internal Audit.

A summary of the reports issued and progress against the agreed Internal Audit Plans for 2017/18 and 2018/19 is included at appendix 1. A brief narrative of the work completed by Internal Audit since the previous meeting of this Committee is also summarised at appendix 1.

Internal Audit has undertaken a review of progress made by management in implementing agreed actions within six months of the completion of the respective audits. Details of this follow-up work is included at appendix 2. Where agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

Further progress reports will be submitted to each future meeting of this Committee. A final report detailing the overall performance and productivity of Internal Audit for 2017/18 is included elsewhere on this agenda.

Recommendation

The Committee is asked to NOTE the report.

Background papers

Nil

APPENDIX 1

INTERNAL AUDIT REPORTS ISSUED SINCE SEPTEMBER 2017

No	Audit Title	SIA	Report Issued	Opinion	Actions		IA Plan 2017/18 Complete
					Significant	Merits Attention	
04	Local Auth. Housing Statistics Return	WL	08/09/17	Substantial	0	0	-
05	Asset Register (Estates Management)	CF	15/09/17	Reasonable	1	2	6%
06	Creditors and Purchasing	WL	15/09/17	Reasonable	1	2	8%
07	Land Charges	CF	15/09/17	Substantial	0	0	11%
08	Payroll	WL	15/09/17	Reasonable	1	1	14%
09	Car Parking	CF	15/09/17	Substantial	0	1	17%
10	Disabled Facilities Grants	WL	19/10/17	Substantial	0	0	19%
11	Prospective Tenant at The Square	CF	26/10/17	n/a	-	-	-
12	Willow Court Social Fund	WL	02/11/17	n/a	-	-	-
13	Capital Works	CF	10/11/17	Substantial	0	1	22%
14	NNDR	WL	21/11/17	Substantial	0	0	25%
15	Planning Applications and Income	CF	23/11/17	Substantial	0	1	28%
16	Treasury Management	WL	23/11/17	Substantial	0	2	30%
17	Fin App - Replacement CRM System	CF	04/12/17	n/a	-	-	-
18	Housing Repairs	CF	22/01/18	Reasonable	1	2	32%
19	Leisure Membership Scheme (LLL)	CF	22/01/18	Substantial	0	0	35%
20	HiMO Licences	WL	23/01/18	Substantial	0	4	38%
21	Stores	CF	31/01/18	LIMITED	2	1	41%
22	Kimberley Leisure Centre (LLL)	CF	07/02/18	Substantial	0	1	43%
23	Trade Waste	CF	07/02/18	Substantial	0	0	46%
24	Council Tax	WL	20/02/18	Substantial	0	1	49%
25	Key Reconciliations	WL	01/03/18	Substantial	0	0	51%
26	Bank Reconciliation	WL	06/03/18	Substantial	0	0	54%
27	Rents	WL	20/03/18	Substantial	0	0	57%
28	Pre-Eviction Protocol for Rent Arrears	WL	21/03/18	Substantial	0	0	-
29	Gas Safety Servicing and Maintenance	CF	20/04/18	Substantial	0	1	59%
01	Erewash BC – Risk Management	CF	24/04/18	-	-	-	-
02	Erewash BC – Crematorium	CF	04/05/18	-	-	-	-
30	Financial Resilience	CF	14/05/18	Substantial	0	0	62%
31	CDM Regulations	CF	18/05/18	Reasonable	1	0	65%
32	Human Resources	CF	22/05/18	Substantial	1	1	68%
03	Procurement	CF	07/06/18	LIMITED	1	1	3% 70%
33	Benefits	WL	12/06/18	Reasonable	1	0	73%
34	Risk Management	CF	25/06/18	Substantial	0	3	76%
04	Cemeteries (with Erewash BC)	CF	25/06/18				5% -
35	Parks and Grounds Maintenance	WL	28/06/18	Substantial	0	1	78%
36	Choice Based Lettings	CF	30/06/18	Substantial	0	1	81%

REMAINING INTERNAL AUDIT PLAN 2017/18

No	Audit Title	SIA/ Days	Progress	IA Plan Complete
	Serious and Organised Crime Audit	WL	Draft report issued	84%
	Sundry Debtors	WL	Draft report issued (Amalgamate with 2018/19 audit)	86%
	Computer/ICT	WL	Ongoing (Amalgamate with 2018/19 audit)	89%
	Information Governance (Management)	8	Audit deferred to 2018/19	92%
	Corporate Governance	8	Audit deferred to 2018/19	95%
	Fees and Charges	5	Audit postponed	97%
	Local Authority Trading Company	5	Audit postponed	100%

REMAINING INTERNAL AUDIT PLAN 2018/19

No	Audit Title	SIA/ Days	Progress	IA Plan Complete
	Sundry Debtors	WL	Draft report issued (Amalgamate with 2018/19 audit)	8%
	Computer/ICT	WL	Ongoing (Amalgamate with 2018/19 audit)	11%
	Asset Register (Estates Management)	CF	Ongoing (Nearing completion)	14%
	Creditors and Purchasing	CF	Ongoing (Nearing completion)	16%
	Payroll (including Officers Allowances)	WL	Ongoing (Nearing completion)	19%
	Electrical Testing	CF	Ongoing (Nearing completion)	22%
	Information Governance	8	Expected to commence in Q2	24%
	Events (including Play Leadership)	2	Expected to commence in Q2	27%
	Cash Receipting	8	Expected to commence in Q2	30%
	Corporate Governance (incl. Ethics)	8	Expected to commence in Q2	32%
	Legionella Testing (incl. IL Schemes)	5	Expected to commence in Q2	35%
	Right to Buy	5	Expected to commence in Q2	38%
	Section 106 Agreements	5	Expected to commence in Q2	41%
	Safeguarding	8	Expected to commence in Q2/3	43%
	Commercial Properties (All)	8	Expected to commence in Q2/3	46%
	Garden Waste Collection	5	Expected to commence in Q2/3	49%
	Transport (Fleet Management)	10	Expected to commence in Q2/3	51%
	Commercialisation/Business Strategy	8	Expected to commence in Q2/3	54%
	Tenancy Management (incl. ASB)	10	Expected to commence in Q3	57%
	Beeston Town Centre Redevelopment	6	Expected to commence in Q3	59%
	Lifeline (Aids and Adaptations)	5	Expected to commence in Q3	62%
	Licensing (including Taxi Licences)	8	Expected to commence in Q3	65%
	Treasury Management	6	Expected to commence in Q3	68%
	Bramcote Leisure Centre	8	Expected to commence in Q3	70%
	Energy (including Procurement)	8	Expected to commence in Q3	73%
	Homelessness	10	Expected to commence in Q3/4	76%
	Risk Management (Risk Assessment)	8	Expected to commence in Q3/4	78%
	NNDR	10	Expected to commence in Q3/4	81%
	Rents (including Evictions)	12	Expected to commence in Q3/4	84%
	Choice Based Lettings	12	Expected to commence in Q4	86%
	Bank Reconciliation	3	Expected to commence in Q4	89%

REMAINING INTERNAL AUDIT PLAN 2018/19 (CONTINUED)

No	Audit Title	SIA/ Days	Progress	IA Plan Complete
	Key Reconciliations	2	Expected to commence in Q4	92%
	Benefits	20	Expected to commence in Q4	95%
	Council Tax	12	Expected to commence in Q4	97%
	Human Resources	8	Expected to commence in Q4	100%

COMPLETED AUDITS

A report is prepared for each audit assignment and issued to the relevant senior managers at the conclusion of a review that will:

- include an overall opinion on the adequacy of controls within the system to provide assurance that risks material to the achievement of objectives are adequately managed – the opinion being ranked as either ‘Substantial’, ‘Reasonable’, ‘Limited’ or ‘Little’ assurance;
- identify inadequately addressed risks and non-effective control processes;
- detail the actions agreed with management and the timescales for completing those actions; and
- identify issues of good practice.

The recommendations made by Internal Audit are risk assessed, with the agreed actions being categorised accordingly as follows:

- Fundamental – urgent action considered imperative to ensure that the Council is not exposed to high risks (breaches of legislation, policies or procedures).
- Significant – action considered necessary to avoid exposure to significant risk.
- Merits Attention (Necessary Control) – action considered necessary and should result in enhanced control or better value for money.
- Merits Attention – action considered desirable to achieve enhanced control or better value for money.

The following audit reports have been issued with key findings as follows:

1. Gas Safety (Servicing and Maintenance) Assurance Opinion – **Substantial**

Internal Audit reports that the Council has an appropriate framework in place for the administration of operations in respect of gas safety. The review indicated one area for improvement to involve the Housing Performance Management team in providing ongoing independent assurance over the performance of the Gas Servicing and Maintenance team. This action was duly implemented by the Interim Senior Housing Manager and the Housing Repairs Manager.

2. Erewash Borough Council – Risk Management

As part of the Internal Audit Collaboration arrangements, Internal Audit has completed a review of the systems and procedures operating in respect of Risk Management at Erewash Borough Council which was carried out as part of the Erewash Internal Audit Plan for 2017/18.

3. Erewash Borough Council – Bramcote Crematorium

As part of the Internal Audit Collaboration arrangements, Internal Audit has completed a review of the systems and procedures operating at Bramcote Crematorium which was carried out as part of the Erewash Internal Audit Plan for 2017/18.

Members will be pleased to note that no significant issues were found and Internal Audit duly issued a substantial assurance opinion 'clearance' report.

4. Financial Resilience Assurance Opinion – **Substantial**

Internal Audit sought to ensure that the annual budget and medium term financial strategy (MTFS) are produced in a timely and appropriate manner based upon high quality financial and non-financial data and financial issues identified during their production are promptly addressed.

The Council has engaged the services of the Local Government Association in undertaking a desktop review of its financial position in order to assess the situation and suggest areas for further review to assist in addressing the challenging financial environment that it faces. The review was undertaken by a senior experienced public finance professional. The conclusions were that the Council has managed reductions in funding well over the past seven years. The review did identify specific areas that the Council could examine further in an attempt to strengthen its financial position. These have been considered by the Interim Deputy Chief Executive and have since been reported to the Finance and Resources Committee, with follow-up reports being added to the Committee work programme.

Internal Audit is assured that, going forward, the MTFS will be subjected to greater scrutiny through the General Management Team and the Finance and Resources Committee, with robust challenges being made of the budget assumptions. This level of scrutiny is to be welcomed.

Overall, the review did not indicate any significant weaknesses or areas for concern and, accordingly, a clearance report was duly issued.

5. CDM Regulations Assurance Opinion – **Reasonable**

Internal Audit reviewed the systems and procedures operating in respect of the Construction (Design and Management) Regulations 2015 and found that the Council has an appropriate framework in place to ensure compliance.

There was one 'significant' action proposed relating to the need to ensure overall compliance with the requirements of the CDM Regulations, as follows:

Overall Compliance with CDM Regulations

Internal Audit sought to ensure that processes and procedures within the Council's compliance framework are appropriate and robust.

The overall framework, processes and procedures were reviewed to ensure compliance with the CDM Regulations. These arrangements were found to be satisfactory. It was also noted that processes are operating effectively with regard to major construction projects.

However, the CDM Regulations cover a wide variety of construction type schemes, both large and small. A review of the centrally maintained contractor database suggested that this listing is incomplete, particularly with regard to smaller construction projects managed outside of Capital Works. This inevitably increases the risk of non-compliance.

Agreed Action (Significant)

The Head of Property Services will ensure that information and assistance is readily available to all those with responsibilities for procuring and commissioning construction related works. Expert support in this process will be provided by the Modernisations Manager.

The importance of compliance with CDM Regulations will be re-emphasised across the Council. This work will include:

- providing the revised 'Introduction to CDM 2015' document, the 'Health and Safety Code of Safe Working Practice for Construction Contractors' and the 'Contractors Health and Safety Assessment Form' on the intranet
- producing an e-Learning course to complement the existing Health and Safety suite of courses
- providing regular reminders to relevant managers and officers.

Managers Responsible

Head of Property Services

Capital Works Manager

Modernisations Manager

Target Date: 30 June 2018

6. Human Resources

Assurance Opinion – **Substantial**

This review identified areas for improvement. One 'significant' action was proposed relating to the need for robust controls in place to ensure that potential IR35 implications are considered and evidenced for all temporary appointments, as follows:

Process and Procedure for IR35

Internal Audit sought to ensure that recruitment is appropriately performed in accordance with Council policy and procedures.

The Council has an appropriate policy and procedure for managing the risks and other administrative matters relating to the impact of 'IR35 legislation' on agency workers, contractors, consultants and other temporary employees.

Unfortunately, an inspection of the records maintained under this policy revealed that the procedures detailed in the policy are not being followed. The central list maintained by the Payroll and Job Evaluation Manager contained the name of only one contractor. This is clearly not the case, given that some departments are known to make extensive use of agency staff and contractors.

Agreed Action (Significant)

The importance of compliance with the IR35 procedures will be reiterated across all senior management. Heads of Service have been reminded to consider IR35 implications for all temporary appointments and to submit the necessary returns to Payroll in a timely manner. The regular monthly emails from Payroll also now include reference to IR35 considerations. Progress will be kept under scrutiny and reported to GMT as necessary.

Managers Responsible

Human Resources Manager

Payroll and Job Evaluation Manager

Target Date: 30 June 2018

The review also indicated an area for improvement, with a 'Merits Attention – Necessary Control' action being proposed in respect of the need to maintain complete records of recruitment documentation and sickness absence with further controls to ensure that all documents are received and filed appropriately.

These actions were agreed by the Human Resources Manager and the Payroll and Job Evaluation Manager. Internal Audit will complete appropriate follow-up work at six months from the date of the audit report and will report back to Committee accordingly.

7. Procurement

Assurance Opinion – **Limited**

Internal Audit proposed a 'significant' action for the requirement to comprehensively review and update the Council's procurement activity, namely:

Comprehensive Review and Update of Procurement Activity

Internal Audit sought to ensure that a relevant Procurement Strategy is in place and that this is effectively implemented throughout the Council.

There had been a prolonged period of vacancy in the lead Procurement role whilst organisational arrangements were reviewed following the departure of the former postholder. It was found that:

- The Commissioning and Procurement Strategy was out-of-date and requires review and update.
- The Contracts Register was incomplete and required updating and action as set out below.
- There was only a limited central mechanism in place to monitor supplier spending and consider value-for-money and/or the need for formal tendering has been in place.

In response to this, the Council has recently appointed an expert Interim Procurement and Contracts Officer with a specific remit to remedy these and other key priorities. A document has been produced to clarify and formalise a work plan which has been considered/agreed by General Management Team.

Agreed Action (Significant)

An Interim Procurement and Contracts Officer has recently been appointed who has significant experience in public sector procurement/contract management. This officer's key priorities and tasks in the short to medium term include:

- Refreshing the Commissioning and Procurement Strategy to ensure compliance with the Public Contracts Regulations 2015 and current corporate requirements.
- Refreshing associated procurement guides on the intranet and website.
- Reviewing the current Contracts Register, in conjunction with senior management and the Legal Department, to ensure that the register is transparent and that there is a robust tendering work schedule covering all significant value transactions (and strategically important) for all Council activities. The initial focus will be on expired and soon to expire contracts.
- Ensuring that the Contracts Register is comprehensive, with analysis of management information to evaluate potential efficiencies/savings and identify areas of spend which should be awarded under contract following a competitive tendering exercise.
- Supporting the current review of the Council's Constitution, in particular relating to Financial Regulations/Contract Standings Orders.
- Establishing a suitable framework for contract management, including liaising with senior management to identify key contracts over £25,000 and advice on how the monitoring of these and operational performance management could be improved.
- Promoting the most efficient means of procurement activity, including the development of e-procurement systems and processes.

Managers Responsible

Head of Finance Services

Chief Audit and Control Officer

Interim Procurement and Contracts Officer

Target Date: 31 October 2018

The review also indicated a further area for improvement, with a 'Merits Attention – Necessary Control' action being proposed to develop a procurement e-Learning package to complement the existing support and guidance that is available on the intranet and website.

The actions were agreed by the Head of Finance Services, Chief Audit and Control Officer and the Interim Procurement and Contracts Officer. Internal Audit will complete appropriate follow-up work at six months from the date of the audit report and will report back to Committee accordingly.

8. Benefits

Assurance Opinion – **Reasonable**

The Council has an appropriate framework in place for the administration of benefits. It was also pleasing to acknowledge the positive outcome of the review of the Benefits Subsidy claim by the external auditors where an unqualified audit report was provided for the second consecutive year. The positive outcome provides further management assurance that the DWP are comfortable with the adequacy of the arrangements in place.

Internal Audit proposed a 'significant' action relating to the need to ensure that benefits claim assessments and overpayment checks are undertaken regularly as prescribed and the performance monitored, as follows:

Checking of Claim Assessments and Overpayments Objectives

Internal Audit sought to ensure that appropriate measures are in place to ensure that the correct Housing Benefit and Council Tax Support, including any overpayments and subsidy, are applied in each case.

A small proportion (4%) of all claims for Housing Benefit and Council Tax Support should be checked by a second Benefits Assessor. It was found that this was not happening on a regular basis, with the last recorded check having been carried out several months prior to the date of the audit testing.

Concerns about the lack of checking were raised at the previous audit, as there is an obvious risk of errors being made that could lead to benefit claims being wrongly assessed.

A similar proportion (4%) of all Housing Benefit Overpayment calculations should also be checked by the Quality and Control team. At the previous audit there was evidence that these checks were being completed, but the error rate was high at around 10%.

Internal Audit confirmed that some checks in relation to overpayments had been completed this year. Whilst only a small number of 'critical' errors (which if undetected would have resulted in benefits being wrongly refused or underpaid/overpaid) were noted, this may have been because only a limited number of checks had been completed.

Management indicated that after this matter was raised at the previous audit, training was given to an officer to complete these checks. However, this officer has since left the authority. This departure has affected the number of reviews completed and another officer has to be trained. This matter raises concerns about accuracy and succession planning.

Agreed Action (Significant)

The checking process for Housing Benefit and Council Tax Support claim assessments and overpayments will be fully reinstated and monitored at the earliest opportunity.

Working practices will be adapted to ensure that the monitoring process is actioned on a regular basis. Some of the monitoring will be undertaken within the Performance team to ensure consistency in the monitoring process. Training will be provided by the Team Leaders to the relevant individual over the coming weeks.

Managers Responsible

Head of Revenues and Benefits Shared Service

Senior Benefits Assistant(s)

Quality and Control Manager

Target Date: 31 July 2018

Internal Audit will complete appropriate follow-up work at six months from the date of the audit report and will report back to Committee accordingly.

9. Risk Management Assurance Opinion – **Substantial**

Internal Audit reported that the Council has an appropriate framework in place for Risk Management. The review indicated areas for improvement regarding the need to review and refresh the approach to the risk management process, with three 'Merits Attention' recommendations (including two 'Necessary Control' actions) being proposed to:

- Review the approach to risk management, in conjunction with the Council's insurers, following which a refreshed Risk Management Strategy and Policy Statement should be submitted to this Committee for approval.
- Consider the effectiveness of the Strategic Risk Management Group as part of the risk management review.
- Produce and submit an annual report on the effectiveness of risk management to this Committee for consideration.

An action plan was duly agreed by the Head of Finance Services.

10. Cemeteries Assurance Opinion – **Substantial**

Internal Audit has completed a review of cemeteries, which also considered arrangements at Erewash Borough Council as part of the Internal Audit Collaboration arrangements.

Each Council has appropriate frameworks for its respective cemeteries. The review did indicate an area for improvement with one 'Merits Attention – Necessary Control' action being proposed relating to the need to provide an efficient solution for maintaining effective, full and accurate cemetery records.

The proposed action was agreed by the Head of Property Services (Broxtowe), Head of Green Space and Street Scene (Erewash), the Bereavement Services Manager and the Senior Cemeteries Officer.

11. Parks and Grounds Maintenance Assurance Opinion – **Substantial**

Internal Audit is pleased to report that the Council has an appropriate framework in place for the day-to-day administration of operations in respect of Parks and Grounds Maintenance. A potential area of efficiency was identified relating to the security contractor for the supply of attendants at the recreation grounds for the purpose of providing pavilions/changing facilities for pre-booked matches. If a suitable fixed fee could be negotiated and agreed with the contractor this could provide efficiencies in terms of the processing and checking of timesheets to the mutual benefit of both the Council and the security contractor. This matter is being taken forward by the Business and Projects Manager.

12. Choice Based Lettings Assurance Opinion – **Substantial**

The Council has an appropriate framework in place for the Choice Based Lettings system. Internal Audit was also pleased to note that a revised Allocations Policy was approved by the Housing Committee in June 2018 and is scheduled for full implementation in November 2018.

The review has indicated areas for improvement, with one 'Merits Attention - Necessary Control' action being proposed relating to the need to enhance controls relating to declarations of interest. A further observation was made regarding an ongoing review of user access permissions across the constituent authorities with special regard to GDPR provisions. Internal Audit will follow-up on this matter at the next audit.

An action plan was duly agreed by the Interim Senior Housing Manager, the Temporary Housing Options Manager and the Lettings Manager.

Further reviews in respect of the Asset Register (Estates/Asset Management), Computer, Creditors and Purchasing, Electrical Testing, Payroll (including Officers Allowances), Serious and Organised Crime and Sundry Debtors are ongoing and the reports have yet to be finalised. These will be included in the next progress report to Committee.

Current Audit Performance

Overall 22% of planned audits for 2018/19 are near to completion as at 30 June 2018. This level of performance is similar to what was achieved at this stage in the previous year and the target of 90% is expected to be achieved.

APPENDIX 3

INTERNAL AUDIT FOLLOW-UP

Internal Audit has undertaken a review of progress made by management in implementing agreed actions within six months of the completion of the audit.

The table below provides a summary of the progress made with agreed actions for internal audit reports issued between September 2014 and November 2017 (i.e. within six months of completion), excluding clearance reports. Those audits where all actions have previously been reported as completed have also been excluded from this list.

No	Audit Title	Report Issued	Opinion	Number of Actions (Significant in brackets)	Progress
14	Leasehold Service Charges 2014/15	19/09/14	Reasonable	6	Completed
01	Procurement 2015/16	28/05/15	Reasonable	3 (1)	Next Audit
10	CCTV 2015/16	09/09/15	LIMITED	3 (2)	2 Outstanding
36	Household Refuse/Bulky Waste 2015/16	06/06/16	Reasonable	5 (1)	1 Outstanding
12	Members Allowances 2016/17	06/10/16	Substantial	3	1 Outstanding
32	Flexi-time Management 2016/17	11/05/17	Reasonable	3 (1)	Completed
33	Information Management 2016/17	12/05/17	Reasonable	4	2 Outstanding
35	Benefits 2016/17	24/05/17	Reasonable	2 (1)	Next Audit
03	Cash Receipting 2017/18	31/07/17	Reasonable	4 (1)	Completed
38	Sundry Debtors 2016/17	10/08/17	Reasonable	1 (1)	Next Audit
05	Asset Register (Estates Management)	15/09/17	Reasonable	3 (1)	Next Audit
06	Creditors and Purchasing 2017/18	15/09/17	Reasonable	3 (1)	1 Outstanding
08	Payroll 2017/18	15/09/17	Reasonable	2 (1)	Completed
09	Car Parking 2017/18	15/09/17	Substantial	1	Completed
13	Capital Works 2017/18	10/11/17	Substantial	1	Completed
15	Planning Applications and Income 2017/18	23/11/17	Substantial	1	Completed
16	Treasury Management 2017/18	23/11/17	Substantial	2	Completed

Further details of progress being made with agreed actions that have not yet been fully implemented are included below along with comments from management reflecting any updates on progress. Evidence of implementation will not be routinely sought for all actions as part of this monitoring process. Instead, a risk-based approach will be applied to conducting further follow-up work.

Where the agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

OUTSTANDING ACTIONS

1. CCTV		September 2015, Limited Assurance, Agreed Actions – 3 (with 2 Significant)
1.1 CCTV Management and Control		Progressing
1.2 CCTV Policy		Progressing
<p><u>Agreed Actions (Significant)</u></p> <p>There is consideration of establishing a central management and control function in respect of CCTV at Broxtowe, with the proposal to create this expertise under the revised remit of the Parking Manager.</p> <p>A comprehensive policy/guidance document covering the operation of CCTV systems across the Council will be created having due regard to the relevant legislation, regulations and codes of practice.</p> <p>To support this process, the Parking Manager will initially complete a schedule of visits to all satellite sites with CCTV systems to offer guidance and support. These visits will include a summary review of the respective systems in place and, where appropriate, immediate restrictions will be applied if found to be necessary. Whilst the Parking Manager will be the direct contact for advice and support, a responsible officer will be identified for individual systems at each site.</p> <p><u>Managers Responsible</u> Head of Property Services Parking Manager</p>	<p><u>Management Progress Report of the Head of Property Services</u></p> <p>Centralised management has taken place for 90% of the Council's camera surveillance stock. All sites have been visited with the purpose and need for each system being reviewed. Recommendations have been made regarding the appropriateness, centralisation and continued monitoring responsibilities of each system. All officers associated with surveillance systems have received guidance on appropriate use in line with the Government's Camera Surveillance Commissioner's principles.</p> <p>The Council is working in accordance with Government guidance, but policies need updating to reflect changes in circumstances.</p> <p>The Parking Manager has made progress with centralisation and has advised Liberty Leisure on its operations. Centralising all systems is difficult and will require further dedicated resources to fully complete this process. A lack of officer resources does not allow an alternative site visit-based monitoring and enforcement option. Some savings have been achieved by reducing monitoring costs for the shared service. Negotiations in relation to shared control room and CCTV maintenance management is taking place. This will hopefully secure funding for additional resource to support CCTV, Security and Parking Services.</p> <p>The process of developing updated and more accurate comprehensive policies to reflect surveillance activities has been delayed.</p>	

2. HOUSEHOLD AND BULKY WASTE		June 2016, Reasonable Assurance, Agreed Actions – 5 (including 1 ‘Significant’)
2.1 Income Reconciliation for Special Collections		Outstanding
<p><u>Agreed Action</u> (Merits Attention – Necessary Control)</p> <p>The formal reconciliation of special collection income (bulky items) will be reinstated and completed on a monthly basis to ensure that all monies received agree to the amounts expected and to the transactions posted on the general ledger. This check will be evidenced by way of a signature.</p> <p><u>Managers Responsible</u> Environment and Business Development Manager</p>	<p><u>Management Progress Report of the Environment and Business Development Manager</u></p> <p>Due to resource issues and work priority this has still not been actioned. Discussions are taking place to determine how best this can be done within existing resources.</p>	
3. MEMBERS ALLOWANCES		October 2016, Substantial Assurance, Agreed Actions – 3
3.1 Motor Insurance – Business Use		Progressing
<p><u>Agreed Action</u> (Merits Attention)</p> <p>Members will be asked to provide annual confirmation to the Council that their motor insurance policy provides cover for ‘business use’ wherever appropriate. This will be provided via Democratic Services.</p> <p><u>Managers Responsible</u> Head of Administrative Services/Chief Audit and Control Officer</p>	<p><u>Management Progress Report of the Head of Administrative Services</u></p> <p>This matter is being considered as part of a wider review of the Driving at Work Policy. Any requests for information will be supported by Democratic Services.</p>	

4. INFORMATION MANAGEMENT		May 2017, Reasonable Assurance, Agreed Actions – 4
4.1 Progress to address previously identified issues		Progressing
<p><u>Agreed Action</u> (Merits Attention – Necessary Control)</p> <p>The SIRO audit will be completed as soon as the appropriate resources are identified. Internal Audit’s support with this matter would be appreciated and has been offered.</p> <p><u>Managers Responsible</u> Chief Information Officer</p> <p style="text-align: right;">Target Date: 30 June 2017</p>	<p><u>Management Progress Report of the Chief Information Officer</u></p> <p>Progress on this piece of work was delayed due to officer time being taken up largely with GDPR related work and supporting the implementation of the action plan up to and beyond the end of March.</p> <p>The latest SIRO Audit has now commenced, with the Information Governance Officer starting to receive replies from Information Asset Owners (IAO). The Chief Information Officer will review the returns and produce the combined report that will be presented to GMT before the end of July.</p>	
<p>The summary findings of the forthcoming SIRO audit will be presented to GMT for consideration. GMT will be encouraged to consider the actions identified within their respective departmental management team meetings to ensure transparency and to encourage progress.</p> <p><u>Managers Responsible</u> All Chief Officers</p> <p style="text-align: right;">Target Date: Ongoing from July 2017</p>	<p>As above, the latest SIRO audit findings will be presented to GMT for consideration and with Chief Officers for consultation with their respective management teams.</p>	
4.2 Destruction of Records		Progressing
<p><u>Agreed Action</u> (Merits Attention – Necessary Control)</p> <p>The next SIRO audit will include the need for Information Asset Owners to confirm deletion in line with their agreed documented arrangements (Information Asset Register).</p> <p><u>Managers Responsible</u> Chief Information Officer</p> <p style="text-align: right;">Target Date: 30 June 2017</p>	<p><u>Management Progress Report of the Chief Information Officer</u></p> <p>This information has been captured as part of the Information Asset Registers (which form part of the GDPR Action Plan). Any identified risks regarding deletion arrangements and controls will be followed up as part of the current SIRO audit.</p>	

5. CREDITORS AND PURCHASING		September 2017, Reasonable Assurance, Agreed Actions – 3 (including 1 ‘Significant’)
5.1 Authorisation for Payment		Outstanding
<p><u>Agreed Action (Significant)</u> The Creditors system approval groups will be comprehensively reviewed and updated to ensure that invoices are being appropriately authorised. In the meantime, authorisers will be reminded (via email to Heads of Service and Administrative Officers) of their obligations when approving invoices for payment.</p> <p><u>Managers Responsible</u> Head of Finance Services Chief Accountant</p> <p style="text-align: right;">Target Date: 31 March 2018</p>	<p><u>Management Progress Report of the Head of Finance Services</u> A reminder email was sent to Heads of Service and administrators in March 2018.</p> <p>Following the completion of priority work to produce the annual Statements of Accounts, there is now a commitment to complete the comprehensive review and update approval groups as part of the forthcoming system upgrade, with a revised target date of 30 September 2018.</p>	