

Report to Audit Committee

Agenda
Item:

A.4

Meeting Date: 18 December 2020
Portfolio: Finance, Governance and Resources
Key Decision: Not applicable
Within Policy and Budget Framework YES
Public / Private Public

Title: INTERNAL AUDIT PROGRESS 2020/21 (OCTOBER TO DECEMBER)

Report of: CORPORATE DIRECTOR FINANCE & RESOURCES
Report Number: RD45/20

Purpose / Summary:

This report provides an overview of the work carried out by Internal Audit between October and December of 2020/21. The report also includes information on progress against the agreed audit plan, performance indicators and previous audit recommendations.

Recommendations:

The Committee is requested to

- i) note the progress against the audit plan for 2020/21;
- ii) note the progress made on audit recommendations to date outlined in Appendix B.
- iii) approve the suggested amendments to the 2020/21 audit plan in section 5

Tracking

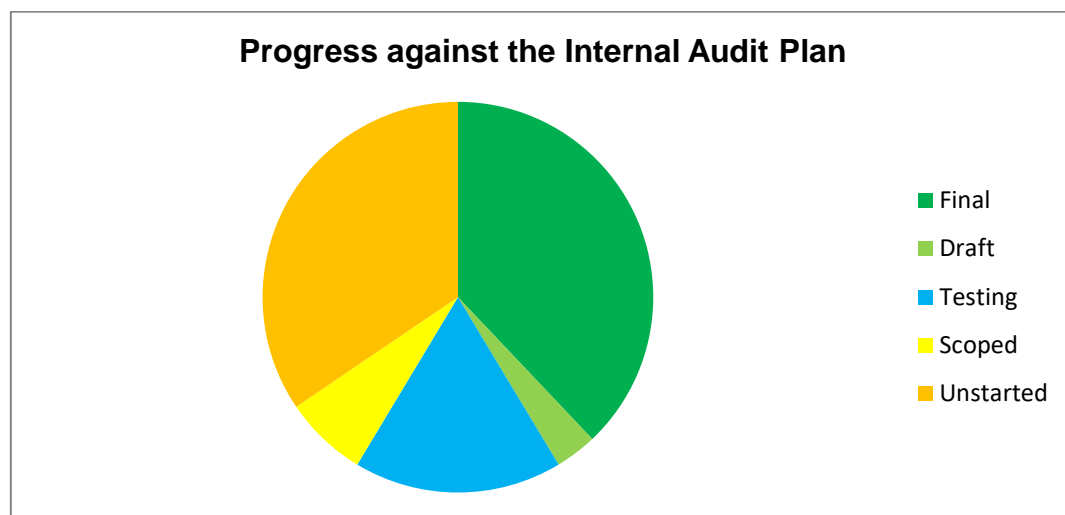
Audit Committee:	18 December 2020
Scrutiny Panel:	Not applicable
Council:	Not applicable

1. BACKGROUND INFORMATION

- 1.1 Management is responsible for establishing effective systems of governance, risk management and internal controls. It is the responsibility of management to establish appropriate arrangements to confirm that their systems are working effectively, that all information within them is accurate and that they are free from fraud or error.
- 1.2 Internal Audit's role is to provide independent assurance to senior management and the Audit Committee over the adequacy and effectiveness of management's arrangements for governance, risk management and internal control.
- 1.3 This report summarises the work carried out by Internal Audit in the period October 2020 to December 2020.

2. PROGRESS AGAINST AUDIT PLAN

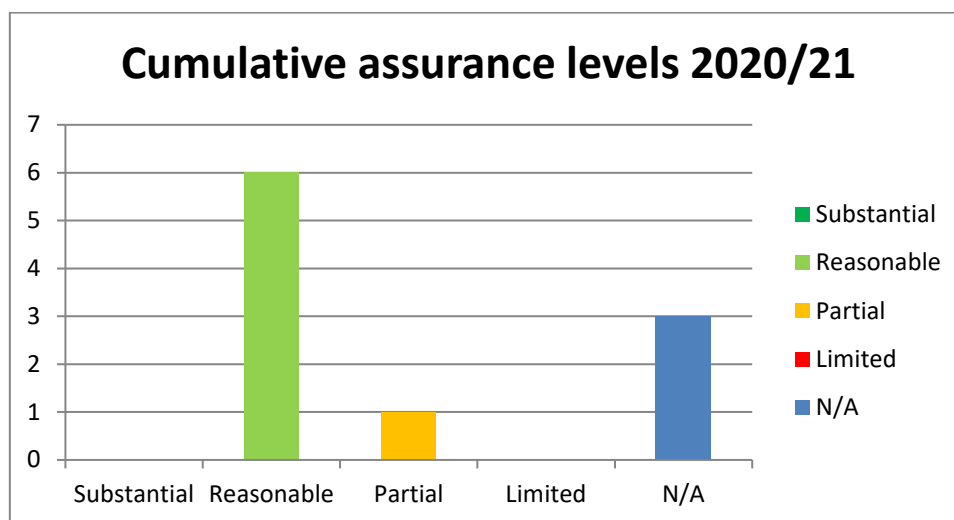
- 2.1 Progress against the 2020/21 audit plan is detailed at **Appendix A**. 38% of planned reviews have been finalised to draft stage, with 3 further reviews expected to be completed in draft by the end of Q3 (48%).



- 2.2 5 planned pieces of work were completed in the period.

Review Area	Assurance Level
Local Air Quality Management	Reasonable
City Centre (Inc events and inspections)	Reasonable
Carlisle Partnership VFM	Reasonable
Income Management (See Part B)	Reasonable
Annual Fraud Review 2019/20 (See Part B)	N/A

These are considered elsewhere on the agenda.



2.3 Audit resource was also utilised on the following during the period:

- Counter-fraud lead for Covid-19 grant payments (reviewing ad-hoc queries from fraud intelligence services N>B No fraudulent activity identified to date)
- Review of Counter-Fraud Policy, providing management with suggested amendments/additions;
- Audit advice to Revenues & Benefits in relation to implementation of new process to administer Track and Trace support payments;
- Ongoing audit advice to Accountancy in relation to amendment of process to issue invoices electronically;
- Audit advice to Senior Management in relation to proposed restructure;
- Audit management activity to recruit to vacant Auditor post (See below)

2.4 Having been scoped in May 2020, an audit review of Development Control was also due to be completed; however, ongoing attempts to liaise with the client to arrange audit testing were unsuccessful. A satisfactory explanation for these delays has now been provided and this audit has been postponed to Q4.

2.5 Internal Audit was also involved in preparation of materials and attending an Effectiveness Review of the Audit Committee. Further work is planned as a result of the review, including preparation of a skills assessment to inform future training provided to Committee Members.

3 PERFORMANCE INDICATORS

3.1 To provide an effective internal audit service, there needs to be a measure of the performance it achieves. The table below shows progress against indicators agreed for 2020/21.

Indicator	Target (YTD)	Performance	Comments
Planned Audits Completed	62%	35%	Annual target 90%
Timely Draft Reports (within 3 months of fieldwork starting)	80%	56%	
Timely Final Reports (within 8 days of client response)	90%	83%	
Recommendations Agreed	95%	100%	
Assignments completed (within 10% of allocated resource)	60%	60%	
Positive feedback	90%	100%	
Chargeable time	80%	73%	
Recommendations implemented	80%	75%	

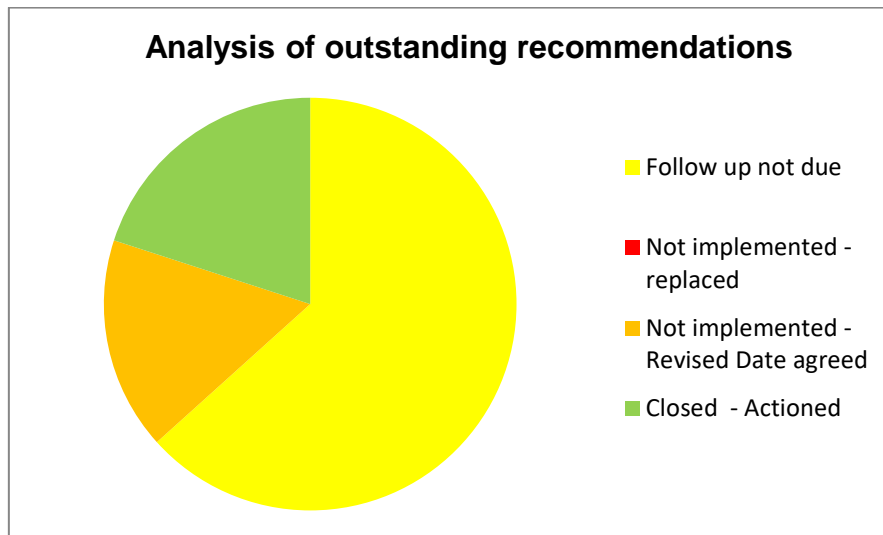
3.2 Due to the disruption of Covid-19 (alongside a vacancy within the team) completion of the Internal Audit plan is currently below target. Proposed actions are in place to review audit plan/resources (see section 5). In addition, priority is being given to those planned reviews that will ensure sufficient coverage to allow Internal Audit to provide an annual audit opinion of the Council's Governance, Risk Management and Internal Control framework.

3.3 This disruption has also resulted in delays in finalising fieldwork, resulting in some draft reports taking longer to complete than normally expected.

4 AUDIT RECOMMENDATIONS

4.1 **Appendix B** shows a summary position of outstanding audit recommendations and progress made against implementing these. Once the agreed implementation date has passed, internal audit will ask the responsible officer for an update of progress. The responses will then be reported to the next available Audit Committee meeting and, if implemented, will then be removed from the list so that only outstanding recommendations remain. Where the recommendations relate to a partial assurance audit, these will be subject to a formal follow up and will be reported back to Audit Committee separately. New recommendations will be added to the list once final reports are agreed.

4.2 29 out of 46 recommendations followed up were found to have been fully implemented (28 of which were followed up for the first time).



- 4.3 The primary reason for delays again relates to the Covid-19 pandemic, which has caused disruption to all Council services. Internal Audit have updated processes to work more closely with Senior Management to ensure recommendations not implemented within agreed timescales are actioned on a timelier basis.

5. AMENDMENTS TO THE AUDIT PLAN/AUDIT RESOURCES

- 5.1 As identified above Internal Audit are currently behind target to achieve the audit plan. A recruitment exercise is underway to fill the vacant post. Internal Audit are also carrying out further work to identify and employ additional temporary resource to assist with the completion of the 2020/21 Internal Audit Plan.
- 5.2 A review of the Internal Audit plan has also been undertaken, including relevant discussion with responsible managers and the following amendments are proposed to the Internal Audit plan:

Corporate Review of Risk Management (Remove)

During 2020/21 the Council's insurers carried out a comprehensive external review of the Council's risk management framework (including consideration of comments provided by Internal Audit. A draft report (including recommendations for improvement) is currently being reviewed by officers within the Council. Internal Audit can take assurances from this review and a further review of risk management would not add value during 2020/21.

ICT Specialist review (Remove)

A new Head of Service is now in post within ICT Services. It would not currently add value to utilise specialist ICT work in this area, until the service is fully established. A scheduled follow-up of all outstanding Internal Audit recommendations will provide assurances on progress against previously identified control issues in this area, enabling a more targeted approach for specialist ICT audit in 2021/22.

Small Business Grants (Remove)

The Internal Audit plan included 10 days consultancy in relation to a proposed project within Economic Development; however, the agreed budget for the project is relatively low, minimising the level of risk involved and the extensive consultancy assignment will not add significant value. Some ad-hoc advice has been provided and consideration will be given to reviewing the scheme in 2021/22.

- 5.3 Given the current resource shortfall it is not considered appropriate to replace these reviews with alternative Internal Audit activity.

6. RISKS

- 6.1 Findings from the individual audits will be used to update risk scores within the audit universe. All audit recommendations will be retained on the register of outstanding recommendations until Internal Audit is satisfied the risk exposure is being managed.

7. CONSULTATION

- 7.1 not applicable

8. CONCLUSION AND REASONS FOR RECOMMENDATIONS

The Committee is requested to

- i) note the progress against the audit plan for 2020/21;
- ii) note the progress made on audit recommendations to date outlined in Appendix B.
- iii) approve the suggested amendments to the 2020/21 audit plan in section 5

9. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES

- 9.1 To support the Council in maintaining an effective framework regarding governance, risk management and internal control which underpins the delivery the Council's corporate priorities and helps to ensure efficient use of Council resources.

Contact Officer: Michael Roper

Ext: 7520

**Appendices
attached to report:**

**Appendix A – Progress against Audit Plan and Timeline of
audits**

**Appendix B – Progress against previous Audit
Recommendations**

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers:

- None

CORPORATE IMPLICATIONS/RISKS:

Legal – In accordance with the terms of reference of the Audit Committee, Members must consider a summary of internal audit activity and summaries of specific internal audit reports. This report fulfils that requirement.

Finance – Contained within the report

Equality – None

Information Governance – None

CARLISLE CITY COUNCIL
PROGRESS AGAINST REVISED AUDIT PLAN 2020/21

Service Area	Review Type	Audit Area	Plan	Actual	Status	Audit Committee	Assurance Evaluation	Comments
Financial Services / Revenues & Benefits	MFS	Internal Control Questionnaires - Non Audited Systems	2	2	Final	Jul 20	N/A	
Council-wide	Governance	Good Governance Principals / Local Code of Conduct	10	11	Final	Jul 20	N/A	
Council-wide	Corporate	Environmental Strategy	15	12	Final	Sep 20	Partial	
Financial Services	Directorate	Insurance	20	22	Final	Sep 20	Reasonable	
Council-Wide	Value for money	Fees & Charges	10	8	Final	Sep 20	Reasonable	
Regulatory Services	Directorate	Local Air Quality Management	20	19	Final	Dec 20	Reasonable	
Health & Well-being	Directorate	City Centre (inc special events/inspections)	20	28	Final	Dec 20	Reasonable	
Financial Services	MFS	Income	15	19	Final	Dec 20	Reasonable	
Carlisle Partnership	Value for money	Carlisle Partnership	10	12	Final	Dec 20	Reasonable	
Council-wide	Counter	Annual fraud review	5	5	Final	Dec 20	N/A	
HR & Payroll	Directorate	Safe recruitment (including health checks etc).	10	13	Draft			
Revenues & Benefits	Counter-Fraud	Business Grants (Covid 19)	10	3	Testing			
Revenues & Benefits	MFS	Housing Benefits	20	3	Testing			
Revenues & Benefits	Directorate	Rev & Ben Revenue Recovery	5	0	Testing			
Electoral Services	Directorate	Electoral Registration	20	14	Testing			
Financial Services	MFS	Financial Services Governance Arrangements	3	3	Testing			
Financial Services	MFS	Debtors	15	3	Scoped			
Development Management	Directorate	Development Control	20	6	Scoped			Postponed

Service Area	Review Type	Audit Area	Plan	Actual	Status	Audit Committee	Assurance Evaluation	Comments
Council-wide	Follow-up	Environmental Strategy	5	1				
Council-wide	Corporate	Risk Management	15	0				Propose removal
Health & Well-being	Directorate	Community Centres	20	0				
Waste Services	Directorate	Waste Services Culture Review	15	0				
Homelessness Services	Directorate	Homeless Accommodation (Part 2)	5	0				
Property Services	Directorate	Property Income	20	0				
Financial Services	MFS	Payroll	15	0				
ICT Services	Follow-Up	ICT Various	10	0				
Council-wide	Follow-up	Driver Checks	5	0				
Regeneration	Consultancy	Small business Grants	10	0				Propose Removal
ICT Services	ICT	Specialist Review	14	0				Propose removal
		Follow-up contingency	10	10				
		Counter Fraud Contingency	20	10				
		Advice & Guidance Contingency	10	13				
		General Contingency	17	19				
		Audit Committee	16	12				
		Planning & Management	58	48				
		OVERALL TOTAL	495	296				

* Days taken as at 6th December (excludes leave and training days)

Ass Code	Audit	Recommendation	Priority	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	No.	Status
B1703	Flexitime & Toil (Reasonable)	The use of the Flexi bank procedures should be reviewed to ensure they are applied consistently.	M	Use of flexi bank procedures will be reviewed alongside the flexi policy and additional guidance issued to Managers and staff, if appropriate.	HR Manager	31 March 2019	31 December 2020	2	A wholesale review of flexi system will be undertaken during 2020 linked to the iTrent development plan.
B1703	Flexitime & Toil (Reasonable)	The policy should be more specific with regards to guidance for travel for courses / training.	M	Existing guidance for travel time, expenses and mileage will be updated for Managers and staff to supplement the current Flexitime scheme.	HR Manager	31 March 2019	31 December 2020	2	A wholesale review of flexi system will be undertaken during 2020 linked to the iTrent development plan. 3rd follow-up scheduled Q4 2020/21
H1707	IT General Controls (N/A)	Given the criticality of data accessible through Active Directory, logs of information security events (i.e., login activity, unauthorised access attempts, access provisioning activity) created by these systems should be proactively, formally reviewed for the purpose of detecting inappropriate or anomalous activity. These reviews should ideally be performed by one or more knowledgeable individuals who are independent of the day-to-day use or administration of these systems.	N/S	Funding for an ICT Security Specialist and an Active Directory auditing tools, SteathBits was included in the 2018/19 ICT Services' budget. The ICT Security Specialist post has been job evaluated based on a new job description. I intend to advertise the post in January 2019. The current issues with recruiting ICT talent for an existing post, has required me to investigate options for making the post more attractive to potential applications, such as adding a market factor supplement and relocation packaged; funding for these needs to be identified. I am also looking at the possibility of converting the post into an apprenticeship. The procurement process for the Stealthbits software will start in December, it anticipated that the software will start monitoring our Active Directory infrastructure in April 2019.	ICT Services Manager	31 December 2017	01 April 2020	3	A contract has been sign with a supplier to provide a managed Security Information and Event Management (SIEM) service; it is anticipated that this service will be 'live' by August 2019. In addition, software has been procured to automate the monitoring of Active Directory; this service will be 'live' by August 2019. To mitigate, the delay in implementing the automated monitoring of Active Directory, manual processes have been put in place to provide ICT management with information on key Active Directory activity. To be included in full formal follow up of ICT Services - Q3/4 2020/21
H1707	IT General Controls (N/A)	Documented policies and procedures addressing change management processes and related control requirements (such as change testing, approvals, and documentation requirements) within Civica Authority Financials, Trent, and Academy should be established, formally approved by the appropriate members of the organisation, and communicated to relevant personnel responsible for implementing them and/or abiding by them	N/S	Following an review of change management methodologies and consultation with my senior managers, I have decide to adopt the Information Technology Infrastructure Library (ITIL) Service Management best practice processes throughout ICT Services. The development of an ITIL implementation plan will be completed by the end of December and implementation will begin in January. Change management and incident management will be the first ITIL processes implemented.	ICT Services Manager	Not stated	01 April 2020	3	All ICT Services staff are undertaking formal training with the aim of gaining ITIL accreditation. A small team has been created to oversee the introduction of ITIL processes throughout ICT Services. This team are currently working on the introduction of Change Management for the management of the council's firewalls; once this is completed, the same process will be expanded to include all services provided by ICT Services. It is anticipated that this will be completed by December 2019. To be included in full formal follow up of ICT Services - Q3/4 2020/21
H1802	Corporate Charge Card (Reasonable)	Card holders should sign a declaration to confirm their adherence to the credit card procedures (including ensuring only they use the card and that the suitable supporting documentation is obtained and completed). Card usage should be independently spot checked to ensure procedures are being adhered to.	H	A declaration form will be prepared and issued to all card holders to sign. This will be updated annually.	Financial Services Manager	30 June 2018	30 May 2020	3	Further developments being undertaken by the Council to introduce virtual Credit Cards. Project delayed due to long-term sickness, followed by impact on Accountancy team due to global pandemic. Internal Audit are continuing to work with finance to ensure new project is adequately controlled. Review progress quarterly.

A1802	Smarter Service Delivery (Reasonable)	A process should be developed to archive and/or delete personal information held within both Salesforce and My Account, in line with suitable retention periods.	M	Scheduled deletion and disposal report tool is currently being configured. MyAccount specific privacy policy is being introduced with appropriate retention schedules applied.	Customer Services Manager	31 August 2018	31 August 2020	3	My Account retention schedules in place. Progress on Salesforce limited due to ongoing vacancy in ICT Services. Extension agreed.
F1804	Council Tax (Reasonable)	Appraisals should be undertaken with all officers and the appraisal documents should be completed timely and processed in line with the Council's processes.	M	Team Leader appraisal notes to be formally agreed. Team Appraisal to be completed in the Revenues Section.	Revenues & Benefits Operations Manager	31st March 2019	31 January 2020	2	Previous documents drafted but not finalised. Delayed due to other priorities in 2020, revised dates to be scheduled for 2020/21 Appraisal. As above, to be scheduled for 2020/21.
F1804	Council Tax (Reasonable)	The GDPR legislation needs to be complied with and data records deleted appropriately.	H	Records to be reviewed, data deletion remains subject to appropriate software functionality	Revenues & Benefits Operations Manager	30 th September 2019	31 March 2020	2	Database review commenced, archiving software used to delete dormant bank details for DD accounts. Further record deletion on an ongoing basis to be evaluated and progress monitored
E1802	Homelessness Services (Substantial)	The Council should obtain clarity on their responsibility for data processed by the Choice-Based Lettings project	M	Meeting of CBL Executive arranged to approve data breach policy.	Homelessness Services Manager.	31 January 2019	31 March 2021	2	Data Impact Assessment completed and draft document circulated for full group approval.
B1804	Casual, Interim & Agency (Reasonable)	The review form should be completed for all agency workers who exceed the 12-week agency rule.	M	Form developed, and process will be updated to ensure compliance. Current Agency agreement with Adecco finished 31st January 2019.	HR Manager	31 March 2019	01 June 2020	2	The whole process for recruiting and employing casuals and agency staff is being reviewed. This is a significant process and has started with a review of all current casual employees. The casual contract needs reviewed together with an update and consolidation of all relevant policies. Review delayed due to impact of Covid-19. Finance team are assisting in making timesheets electronic where possible and a small working group is to be established to review Casual process and paperwork.
B1804	Casual, Interim & Agency (Reasonable)	A process should be developed to ensure HR are aware of all new agency, casual and intermediary staff to ensure relevant employment checks and processes can be performed	M	A new process will be implemented to ensure that the recommendations are met.	HR Manager	30 April 2019	01 November 2020	2	
B1804	Casual, Interim & Agency (Reasonable)	A process to cover the administration of agency, casual and intermediary staff should be completed and approved, including ensuring all posts are approved and that use is monitored on an ongoing basis.	H	Existing council policies will be reviewed and amended, as necessary, to include all classes or workers and employees.	HR Manager	30 April 2019	01 November 2020	2	
A1801	Information Governance (Reasonable)	Recommendation 5 – Assurances should be obtained that all officers without access to a network account have received appropriately targeted training regarding their obligations in relation to records management.	M	Managers with staff who do not have network access will be listed, provided with support and asked to confirm in writing that they have ensured their staff have received appropriate training and information.	Health and Wellbeing Manager	14 June 2019	01 March 2020	2	Training was scheduled for March 2020, but has been postponed due to Covid-19 pandemic (minimal risk due to limited amount of personal records maintained by relevant officers). Revised timescales agreed.
A1801	Information Governance (Reasonable)	Recommendation 9 – Further work is required to ensure the Council stores and disposes of records in line with what is stated in its retention schedules, including particular work required from an ICT perspective.	M	The Council's ICT systems will be reviewed to enable and support the deletion of electronic data. A review of the retention schedules and disposal logs will be added to the Information Governance Inspection Checklist.	ICT Services Manager/ Information Governance Manager	02 August 2019	Review quarterly	N/A	This is a significant exercise, which requires input from ICT Services, who are currently holding a number of vacancies (including Head of Service). It is anticipated that the project will take some time to fully embed. Progress will be reported regularly until completed once a Head of Service is in place.
A1801	Information Governance (Reasonable)	Recommendation 14 – The Council's Home-working guidance and self-assessment should be updated to reflect GDPR requirements	M	The Council's Home-working guidance and self-assessment will be updated to reflect GDPR requirements and re-issued for completion and sign off by managers of staff who work from home	Information Governance Manager / HR Manager	21 June 2019	30 November 2020	2	Covid Pandemic of 2020 has resulted in identifying the need for a wholesale review of the Council's homeworking and agile working policies to be undertaken. Draft revised policies to be drafted and approved - Information Governance Manager has provided model policies to ensure GDPR requirements are addressed.
B1801	Allowances, Travel & Subsistence (Employees) Reasonable	Recommendation 4 – The Council's Scheme of delegation should be amended to include the approval of 'Travel & Subsistence Expenditure'.	M	SST will refer to the Council's Scheme of Delegation for authorised approvers. A general email reminder will be sent to all staff.	Service Support Supervisor / Financial Services Manager	31 July 2019	30 June 2020	2	Scheme of delegation now includes reference to mileage payments. Closed.

B1801	Allowances, Travel & Subsistence (Employees) Reasonable	Recommendation 8 – Consideration should be given to implementing an electronic claim form to improve the legibility, efficiency and internal controls of the travel payment process, including consideration of set mileage for common journeys.	M	This needs to be discussed & investigated further to see if it is time and cost effective. This will be looked in line the i-Trent review which is due to be undertaken in 2020.	Payroll & i-Trent Supervisor / HR Manager	30 April 2021			First informal follow-up scheduled
B1803	Safeguarding (Reasonable)	Recommendation 3 – The Council should ensure all staff required to complete corporate training in relation to adult and child protection complete the relevant modules within Skillgate.	M	A reminder will be issued to all relevant officers asking them to complete the relevant Skillgate training modules.	Corporate Director of Finance and Resources	01-Jul-19	01 July 2020	2	Review of e-learning system indicated various individuals have not yet completed training - revised date agreed.
D1803	Garages (Reasonable)	Recommendation 1 - The Draft Fleet Strategy should be completed, approved and shared corporately	H	Fleet Strategy to be agreed.	Fleet and Depot Manager	30 September 2019	31 March 2020	2	Strategy finalised, but approval delayed due to other priorities (as a result of Covid-19).
D1803	Garages (Reasonable)	Recommendation 8 – Cash banking should be undertaken regularly, and risk assessment should be completed for cash carrying.	M	Cash to be banked on a monthly basis. New reception facilities will reduce risks to staff. Chip and Pin payment system to be installed to reduce cash handling risks / costs / values.	Fleet and Depot Manager	30 April 2019	31 March 2020	2	Changes to banking process in progress. Revised date agreed.
M1801	R&B Shared Service (VFM) (Reasonable)	Recommendation 2 - The Service Level agreement should be signed by all parties.	M	Agreement to be signed, subject to any amendments, as the arrangements are currently being reviewed.	Revenues and Benefits Operations Manager	31 st December 2019	30th November 2020	1	In progress. Delays due to absence of ICT Services Manager . Revised date agreed.
M1801	R&B Shared Service (VFM) (Reasonable)	Recommendation 3 – The Data Sharing Agreements should be checked to ensure compliance with GDPR and should be signed by all parties to formalise the arrangement.	H	Sharing Agreement to be check for GDPR compliance and then signed by all parties.	ICT Service Manager	31 st July 2019	30th November 2020	1	In progress. Delays due to absence of ICT Services Manager .
M1801	R&B Shared Service (VFM) (Reasonable)	Recommendation 5 - Prior to the renewal of the Partnership arrangements consideration should be given to the impact of additional work undertaken by Carlisle City Council staff. Consideration should be given to charging for work undertaken in addition to the SLA agreement.	M	Additional work to be evaluated and options for charging, if required, determined	Revenues & Benefits Operations Manager/ICT Service Manager	30 th September 2019	30th November 2020	1	In progress. Delays due to absence of ICT Services Manager .
M1801	R&B Shared Service (VFM) (Reasonable)	Recommendation 6 - A fully costed option appraisal analysis should be undertaken prior to Carlisle City Council's decision to remain in the Shared Service to ensure financial implication are fully understood. The financial benefits such as the software upgrades and training discounts should be quantified as should the non-financial advantages and disadvantages.	M	Analysis of Partnership costs to be produced to inform decisions on future service provision	Revenues & Benefits Operations Manager	31 st December 2019	30th November 2020	1	In progress. Delays due to absence of ICT Services Manager.
B1901	Customer Services Performance Data (Reasonable)	Recommendation 3 - The Customer Services Manager should liaise with ICT Services to ensure that the telephony system needs are correctly assessed and that a suitable solution is procured.	M	Preliminary demos have taken place with all findings forwarded to IT Services / ICT Services to implement Civic wide telephony plan prior to the implementation of the new Customer Contact Centre system.	Customer Service Manager / ICT Services	Completed	30 September 2020	1	Completion delayed due to ICT Services Manager vacancy. Revised date agreed.
C1902	Affordable Housing Register (Reasonable)	Recommendation 7 - Current processes and systems should be reviewed in conjunction with ICT to ensure a more efficient, fit-for-purpose solution is in place.	M	Review current systems with Senior ICT Officer and identify areas where processes and/ or systems can be improved, with a view to identifying a preferred option.	Investment & Policy Manager	31st December 2019	31 December 2020	1	Register transferred to spread-sheet format - closed.
I1901	Mobile Devices (Partial)	Recommendation 1 – The mandatory cyber-security e-learning module should be updated to include latest issues/trends relating to cyber security and enhanced to cover both the physical security of assets and the Council's ICT policies	H	The Skillgate training module will be updated regularly and mandatory for staff to re-take once refreshed.	ICT Services Manager	1st April 2020			Formal follow-up scheduled
I1901	Mobile Devices (Partial)			With members we will highlight key areas during their migration to Windows 10 on an individual basis and then provide a briefing prior to full Council on cyber security, physical security and council assets					

I1901	Mobile Devices (Partial)	Recommendation 2- All device users (Officers and Members) should confirm they have read key ICT policies on an annual basis.	M	A Skillgate module will be created to use the ICT Policy website and test users on key parts of the policies. This will be mandatory for new starters as part of their induction process and all staff annually. With Members we will work with Democratic Services to ensure councillors confirm they have read these policies during the induction/re-election process	ICT Services Manager	1st April 2020			Formal follow-up scheduled
I1901	Mobile Devices (Partial)	Recommendation 3 – An exercise should be undertaken to ensure all individuals assigned mobile devices have completed a custodian form acknowledging responsibility for their allocated device.	M	Work underway to retrospectively sign custodian forms for users issued with equipment before the policies were implemented. Custodian forms obtained for all users receiving equipment after policies implemented	ICT Lead Officer (Support)	1st December 2019			Formal follow-up scheduled
I1901	Mobile Devices (Partial)	Recommendation 4 – Action should be taken to ensure all Members have access to suitable cyber-security training	H	With Members we will highlight the key areas during their migration to Windows 10 (commencing October 2019) on an individual basis and then have a briefing prior to full Council on cyber security, physical security and council assets at a suitable meeting	ICT Services Manager	1st April 2020			Formal follow-up scheduled
I1901	Mobile Devices (Partial)	Recommendation 5 – The Council should obtain an application locker to prevent device users from being able to download software that does not require administration rights.	M	Application lockdown policies for Microsoft in-tune will be tested with the new version of Windows 10 (1809/1909) - to be deployed to the Council's devices in Q1 2020 – for compatibility. If not suitable, Application lockdown within Windows 10 will be enabled through group policies on the network to restrict software being installed where admin privileges are not required e.g. browsers	ICT Lead Officer (Infrastructure)	1st May 2020			Formal follow-up scheduled
I1901	Mobile Devices (Partial)	Recommendation 6 – There should be a regular ongoing review of mobile phone usage to ensure devices are still required.	M	Working with current contract supplier (Social Telecoms) to have them review mobile phone usage for misuse and identify unused devices on a monthly basis	ICT Lead Officer (Infrastructure)	1st December 2019			Formal follow-up scheduled
D1902	Bereavement Services (Reasonable)	Recommendation 1 – A review of the procedure notes should be undertaken.	M	Procedure notes will be reviewed and updated where necessary.	Bereavement Services Manager	30 th Nov 2020	30th December 2020	1	Progress has been made towards procedural notes being reviewed and updated with out of date documents have been deleted. Further work required to complete.
D1902	Bereavement Services (Reasonable)	Recommendation 2 – Management should ensure that the identified team priorities are addressed.	M	Once R3 is implemented a new appraisal will be completed and team priorities addressed.	Bereavement Services Manager	30 th June 2020	28 February 2021	1	In-house training has happened, however, alongside Covid-19, annual leave and staff shortage more progress required. The priority during the last 7 months has been to provide meaningful funerals for the bereaved in a Covid safe environment subject to Government guidelines. Further work required to complete.
D1902	Bereavement Services (Reasonable)	Recommendation 3 – A review of the staffing at the Crematorium should be undertaken to ensure the current level can adequately provide the service.	M	A review of the current staffing is currently being undertaken and recruitment process has been commenced.	Bereavement Services Manager	30th April 2020		1	Review complete and recruitment exercise undertaken, with all posts either filled or in process of being filled. Closed.
D1902	Bereavement Services (Reasonable)	Recommendation 4 - The Provision of Crematoria Mutual Aid agreement should be reviewed and updated to ensure that it complies with legislation.	M	Discussions will be held with Copeland Council and Legal Services to update the agreement to ensure it is covering the necessary legislation	Bereavement Services Manager	30th April 2020	30 December 2020	1	Initial contact made with other parties, but no progress to date.

D1902	Bereavement Services (Reasonable)	Recommendation 5 – The retention schedule and privacy statement should be reviewed to ensure the same retention period is applied.	M	The retention schedule will be updated to reflect the current practices and the privacy statement. Discussion will be held with the Information Governance Manager.	Bereavement Services Manager	30th April 2020	30 December 2020	1	No progress to date. Conversation required with Information Governance Manager.
D1902	Bereavement Services (Reasonable)	Recommendation 6 – All personal data should be stored securely.	M	All personal data is now stored securely.	Bereavement Services Manager	Implemented		1	Additional secure storage space identified and utilised.
D1902	Bereavement Services (Reasonable)	Recommendation 7 – The memorial forms should be reviewed so that service users are aware their data is being sent to a third-party provider.	M	Memorial forms will be reviewed and updated accordingly.	Bereavement Services Manager	30 March 2021	01 March 2021	1	Process changed to stop sharing of personal information; however, forms still need to be revised. Revised date agreed.
D1902	Bereavement Services (Reasonable)	Recommendation 8 – The Contract with ClearSkies Software should be updated to include reference to meeting GDPR legislation.	M	Discussions will be held with ClearSkies and Legal Services to update the Contract to ensure it is covering the necessary legislation.	Bereavement Services Manager	30th April 2020		1	Evidence provided that contract updated to include clause to ensure appropriate handling of personal information. Closed.
D1902	Bereavement Services (Reasonable)	Recommendation 9 – A record of the Green Spaces job sheets issued should be retained within Bereavement Services, which can then be followed up to ensure jobs are completed.	M	A register will be designed and updated to ensure that all Job Sheets issued are recorded in Bereavement Services.	Bereavement Services Manager	30th April 2020		1	Evidence provided that register of jobs (including completion) is now maintained. Closed.
D1902	Bereavement Services (Reasonable)	Recommendation 10 – The premises handbook should be completed in full.	M	Full review of the premise's handbook will be completed.	Bereavement Services Manager	30th Nov 2020	31 March 2021	1	No progress to date. Revised timescales agreed.
D1902	Bereavement Services (Reasonable)	Recommendation 11 – The premises handbook should be used to record any incidents at the crematorium.	M	Incident forms will be completed as necessary.	Bereavement Services Manager	Implemented		1	Staff informed of procedural change and will use hand-book for future incidences.
D1902	Bereavement Services (Reasonable)	Recommendation 12 – The Surveillance Camera Operating Procedure should be completed, and the signage updated in line with the procedure.	M	The Surveillance Camera Operating Procedure will be completed and implemented.	Bereavement Services Manager	30th April 2020	31 December 2021	1	No progress to date. Revised timescales agreed.
D1905	Tourist Information Services (Reasonable)	Recommendation 1 - Procedures should be updated to ensure all tasks are documented.	M	All tasks will be documented including the opening and closing procedure, Assembly Room hire, stock control, Lone working guidance specific to this service and processing till discrepancies.	Destination Manager	02 January 2020		1	Closed - evidence of revised procedures provided.
D1905	Tourist Information Services (Reasonable)	Recommendation 2 - Risks including the control strategy / mitigating actions should be reviewed and updated on a quarterly basis in line with the Corporate Risk Management Policy.	M	All risks are now identified and are updated in line with Corporate Risk Management Policy and timetable.	Destination Manager	11 November 2019		1	First informal follow-up scheduled.
D1905	Tourist Information Services (Reasonable)	Recommendation 3 - Tourist Information Services should update their retention schedule and disposal log in line with the current corporate template.	M	Data retention to be reviewed and new procedures for each type of data to be implemented.	Destination Manager	03 February 2020		1	Retention schedule updated in line with corporate requirements. Closed.
D1905	Tourist Information Services (Reasonable)	Recommendation 4 - Formal agreements, including data processing agreements should be set up with all third parties that the service processes personal information for. A copy of each third party's privacy notice should be provided and retained.	M	Formal agreements, including data processing agreements will be set up with all third parties.	Destination Manager	03 February 2020	31 January 2021	1	Not been possible to complete due to disruption of Covid-19. Proposed review date agreed.
D1905	Tourist Information Services (Reasonable)	Recommendation 5 - All credit and debit card slips and personal information should be securely retained.	M	Store rooms to upper floor of the Town Hall to be made secure for storage of credit and debit card slips and personal information. Working / live documentation will be retained in a lockable cabinet.	Destination Manager	03 February 2020		1	Closed - assurances provided that work complete to improve security arrangements.
D1905	Tourist Information Services (Reasonable)	Recommendation 6 - All stock should be adequately insured.	M	TIC staff to liaise with the Insurance Officer to make sure that all stock held in the TIC is covered by the Council's insurance policy.	Destination Manager	06 January 2020		1	Closed - evidence provided that stock is included in Council's insurance policy.

D1905	Tourist Information Services (Reasonable)	Recommendation 7 - The electronic data currently stored on the Google Drive should be brought in-house and stored on the Council's network.	M	OFS staff to introduce an alternative in house (SharePoint) solution for shared access between Council departments.	Healthy City Team Manager & Destination Manager	31 March 2020		1	Confirmation provided that shared drive now deleted and alternative data sharing arrangements now in place.
D1905	Tourist Information Services (Reasonable)	Recommendation 8 - Casual officers should be given access to and complete the Skillsgate GDPR and Cyber-Security training.	M	This action plan is being prepared off season. Implementation will be held until spring when casual officers are required.	Destination Manager	01 May 2020		1	Closed - confirmation from Organisation Development that casual officers employed by TIC registered for mandatory e-learning.
D1905	Tourist Information Services (Reasonable)	Recommendation 9 - Casual officers should receive the annual pay uplift.	M	Casual officers will receive the annual pay uplift.	Destination Manager	31 March 2020		1	Closed - confirmation that casual officers employed by TIC being paid 2020-21 casual rates (with uplift included)
D1905	Tourist Information Services (Reasonable)	Recommendation 10 - To comply with the financial procedure rules all value should be accounted for and the number of petty cash floats should be reduced. Petty cash returns should be regularly completed.	M	The spare float used for events is to be eliminated. The £105.52 will be accounted for.	Destination Manager	31 January 2020		1	Closed - rationalisation action confirmed as completed, reducing petty cash floats in place.
D1905	Tourist Information Services (Reasonable)	Recommendation 11 - The relevant fees and charges schedule should be reviewed as part of the next budget process to ensure it accurately reflects all rates and charges.	M	All fees and charges are now included in the financial process.	Destination Manager	01 October 2019	30 May 2021	1	Relevant update not included as part of latest fees and charges reporting cycle. To be included in 2021/22 exercise.
D1905	Tourist Information Services (Reasonable)	Recommendation 12 - An agreement / contract should be implemented between the Council and Booking.com and signed by both parties.	M	The Destination Manager will contact Booking.com to establish if this is possible.	Destination Manager	31 January 2020	31 January 2021	1	Not been possible to complete due to disruption of Covid-19. Proposed review date agreed.
D1905	Tourist Information Services (Reasonable)	Recommendation 13 - A key list should be documented, and staff should sign for the keys that they have been issued with. Arrangements should be made to have an additional safe key cut. Safe keys should not be retained on the premises overnight.	M	All keys & alarm fobs will be accounted for and signed for by officers in possession of keys for Town Hall.	Destination Manager	31 January 2020		1	Reported as implemented - but currently unable to access relevant evidence to allow closure.
D1905	Tourist Information Services (Reasonable)	Recommendation 14 - The Health and Safety file should be reviewed, and all outstanding services / checks should be completed, and a procedure implemented for raising the alarm with adjoining businesses in the event of a fire.	M	Health and Safety files to be reviewed and all outstanding checks completed including arrangements for fire alarms with adjoining businesses.	Destination Manager & Facilities Manager	31 January 2020		1	Closed - confirmation that files updated provided (unable to access due to Covid-19 and files too large to scan)
E1902	Contaminated Land (Substantial)	Recommendation 1 – Individual and team meetings should be carried out more frequently.	M	One to ones to be put in place every 16 weeks.	Principal Health and Housing Officer	Immediately		1	Fortnightly pop-up meetings and quarterly one to ones now in place for team. Evidence provided that appointments are included in team calendars. Closed
E1902	Contaminated Land (Substantial)	Recommendation 2 – Individual training undertaken without Organisational Development involvement should be logged accordingly.	M	The team have started to update their records and this information has been passed to OD. Will ensure all staff with professional training are completed.	Principal Health and Housing Officer	31 January 2020		1	Records updated (minimal returns currently due to pandemic, but process now in place). Closed.
E1902	Contaminated Land (Substantial)	Recommendation 3 – Procedures should ensure that the GIS system is updated timely.	M	This will be incorporated and updated with IT support.	Principal Health and Housing Officer	31 May 2020		1	Procedure confirmed as updated. Closed.
E1902	Contaminated Land (Substantial)	Recommendation 4 – The correct fees should be published for environmental searches and guidance provided on when to apply the charges.	M	Information has been updated.	Regulatory Services Manager	Immediately		1	Fees no longer included on the website - closed.
A1903	Information Security (N/A - Memo)	R1. - A joint ICT and Information Governance document detailing planned and ongoing action to implement Information Security improvements should be created and managed.	M	A joint ICT and Information Governance Action Plan detailing planned and ongoing action to implement Information Security improvements will be created and managed.	Lead ICT Officer Infrastructure Management/ Information Governance Manager	31-Aug-20			Informal follow-up scheduled

A1903	Information Security (N/A - Memo)	R2. - The development and implementation of an Information Asset register should be included within a joint ICT and Information Governance action plan.	M	Development of a corporate Information Asset Register will be added to the joint ICT and Information Governance action plan and will take into consideration existing lists of assets and information processing, with the potential to link them together.	Information Governance Manager	31-Aug-20			Informal follow-up scheduled
A1903	Information Security (N/A - Memo)	R3. – Corporate risks relating to Information Governance and Information Security should be formally identified, recorded, assessed and managed.	M	A review of existing risks and identification of other potential risks will be undertaken to ensure the Council's risk exposure is accurate and up to date.	ICT Lead Officer Infrastructure/ Information Governance Manager	31-Aug-20			Informal follow-up scheduled
A1903	Information Security (N/A - Memo)	R4. - Existing records relating to ICT risks, both Corporate and Operational should be reviewed/ revised to clearly identify and segregate current embedded controls from planned actions.	M	Existing records relating to ICT risks will be reviewed/ revised to clearly identify and segregate current embedded controls from planned actions.	ICT Lead Officer Programme and Project Management	31-Jul-20			Informal follow-up scheduled
C1901	Building Control (Substantial)	Recommendation 1 – A copy of system reports used for performance reporting should be retained on file.	M	This is now in place.	Building Control Services Manager	Implemented		1	Evidence provided that audit trail of reports now retained on new SharePoint site. Closed.
C1901	Building Control (Substantial)	Recommendation 2 – A review of all documentation retained by the team should be carried out to determine which records should be retained and for how long. Duplicate and outdated records should be deleted.	M	The storage of information on shared drives will be reviewed and obsolete information removed as part of the transfer of data onto one drive. Completed files on submit-a-plan will be removed and the information retained on IDOX document management system only.	Building Control Services Manager	01 June 2020		1	Records reviewed, reduced and retained on new SharePoint site. Closed.
C1901	Building Control (Substantial)	Recommendation 3 – Access to IDOX should be reviewed on a regular basis. Users that no longer require access should have their accounts removed.	M	This work has now been actioned and will be reviewed regularly as an officer's status changes.	Building Control Services Manager	Implemented		1	Latest access report indicates only relevant and current officers have access to system. Closed.
D1901	Tullie House (Reasonable)	Recommendation 1 – The monitoring meetings should be scheduled in a way that minimises disruption for both parties but allows for timely & complete reporting	M	Reschedule meetings to ensure that they fit in with both parties schedules	Health & Well-Being Manager	26 February 2020		1	Minute notes (Aug 2020) indicate this joint action has been agreed with THT and parties negotiate meeting dates together. Closed.
D1901	Tullie House (Reasonable)	Recommendation 2 – Monitoring meeting minutes should be developed to ensure all actions are logged and only removed once confirmed as completed.	M	Contract monitoring meetings minutes to be reviewed to ensure adequate information is contained	Health & Well-Being Manager	26 February 2020		1	Meeting minutes amended to include list of outstanding action. Closed.
D1901	Tullie House (Reasonable)	Recommendation 3 – Monitoring meeting minutes should be made available to both parties on a timelier basis.	M	Contract monitoring meetings minutes to be issued within 7 days of the meeting	Health & Well-Being Manager	26 February 2020		1	Evidence provided that minutes issued to all parties on a timelier basis - closed.
D1901	Tullie House (Reasonable)	Recommendation 4 – A process should be established to obtain assurances over the Trust's adherence to the collection and loans agreement	M	To be discussed at next contract monitoring meeting and actions agreed and recorded	Health & Well-Being Manager	26 February 2020		1	Letter issued to THT clarifying position. Closed.
D1901	Tullie House (Reasonable)	Recommendation 5 – The risk register should be reviewed and updated to include all current risks, including achievement of saving targets specified in the Council's Medium-Term Financial Plan	M	Update risk register to ensure that all current risks are included	Health & Well-Being Manager	1st April 2020		1	Risk register reviewed and up to date, including consideration to funding disputes.
D1901	Tullie House (Reasonable)	Recommendation 6 – The Council should obtain regular assurances regarding the Trust's risk management and develop a system to manage shared risks.	M	Explore option for shared risk register at next contract monitoring meeting and implement	Health & Well-Being Manager	31st May 2020	31 March 2021	1	Started, but further work needed to implement. Revised date agreed.
D1901	Tullie House (Reasonable)	Recommendation 7 – The SharePoint site should be developed to include all relevant records.	M	This has been developed and will be the default site for all information	Health & Well-Being Manager	26 February 2020		1	Evidence SharePoint site has been developed. Closed.
D1901	Tullie House (Reasonable)	Recommendation 8 – The Council should obtain assurances that performance information represents value for money and continuous improvement	M	To be discussed at next contract monitoring meeting and actions agreed and recorded	Health & Well-Being Manager	26 February 2020	31 March 2021	1	Started, but on hold as both organisations need to prioritise response to Covid-19 pandemic. Revised date agreed. Revised date agreed.

D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 4 - All existing agreements (including Loomis if necessary) should be reviewed to ensure that they cover the service provided / received, reflect the correct charges and are signed by an authorised signatory from both parties.	M	Agreements will be reviewed/set up.	Team Manager (Parking & Enforcement)	30 April 2020			Informal follow-up scheduled
D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 5 - The Outstanding debts should be resolved, and a revised service level agreement should be presented to M&S including relevant fees.	H	Will liaise with Legal Services and Finance to draw up new SLA and outstanding debt.	Team Manager (Parking & Enforcement)	31 March 2020			Informal follow-up scheduled
D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 8 - A full review should be completed and brought up to date including setting up a Traders Licence and agreement.	M	A car park strategy is currently being developed in partnership with Councillors to support our Local economy, some projects in place including Free after 3. Current activity will be looked at and actioned following Legal advice.	Team Manager (Parking & Enforcement)	31 March 2020			Informal follow-up scheduled
D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 9 - Management should review the current safe-key holding arrangements and ensure a suitable process is in place to ensure income is fully covered by the Council's insurance.	M	Clarification being sought from insurance.	Team Manager (Parking & Enforcement)	12 February 2020			Informal follow-up scheduled
D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 12 - Car Park inspections should be undertaken within the required frequency.	M	Programme of inspections have started in January 2020 and will be completed by the end of February 2020	Team Manager (Parking & Enforcement)	29 February 2020			Informal follow-up scheduled
D1903 / G1901	Car Parking (inc Income) (Reasonable)	Recommendation 13 - The Council should obtain assurances that the Sands Centre monitors both current and future car parking arrangements.	M	Further discussions to held with GLL. CEOs will carry out routine checks to ensure virtual permits issued correctly.	Team Manager (Parking & Enforcement)	19 February 2020			Informal follow-up scheduled
D1904	Driver Checks (Partial)	Recommendation 1 – All officers should be regularly reminded of their responsibility for carrying out necessary driver checks.	H	All managers given guidance and reminded of their responsibilities via email (November 2018 and December 2019). Payroll & Fleet to co-ordinate regular quarterly reminders to all officers. Payroll to review feasibility of loading relevant documents into iTrent and issuing automated reminders from the system Skillgate module to be developed for managers and permitted drivers to further embed checking process and highlight improved guidance.	Fleet and Depot Manager	Completed			Formal follow up scheduled
D1904	Driver Checks (Partial)	Recommendation 2 – The Driver Handbook should be presented to and reviewed by Senior Management to determine if it should be implemented and to what extent it replaces the current road risk policy.	M	Handbook for Drivers to be reviewed and approved by SMT.	Fleet and Depot Manager	31 March 2020			Formal follow up scheduled
D1904	Driver Checks (Partial)	Recommendation 3 – Current processes should be reviewed to ensure there are assurances that driver checks are carried out for all relevant officers.	H	Managers to ensure checks are carried within their remit in line with existing policy and repeated guidance. Payroll to check 'permitted drivers list' before paying any mileage allowance for staff using their own vehicles. Fleet office will continue to provide advice and remind all officers of their responsibilities in line with existing policy to check drivers. Fleet office to also provide monitoring role to ensure compliance prioritising risk-based approach (highest mileage first).	All managers	30 April 2020			Formal follow up scheduled

D1904	Driver Checks (Partial)	Recommendation 4- A process should be in place to ensure all staff driving a pool car have an appropriate licence in place.	H	Additional check to be introduced as part of pool car booking system (Fleet and SST to review option to share list of checked drivers to allow for a more efficient checking process) (Fleet office will continue to provide advice and remind managers of their responsibilities in line with existing policy to check drivers.)	Service Support Supervisor	30 April 2020			Formal follow up scheduled
E1903	Homeless Accommodation (Substantial)	Recommendation 1 - Budgets should be reviewed to ensure that they are realistic and suitable to meet the demands of the service.	M	To review staffing budgets in line with budget cycle review periods. NOTE: caution will need to be applied this financial year given the additional costs and loss of income as a result of dealing with the COVID pandemic	Homelessness Prevention & Accommodation Manager	31 Dec 2020 (2020/21 – 2021/22 financial year)			First informal follow-up scheduled.
E1903	Homeless Accommodation (Substantial)	Recommendation 2 - Casual staff should complete all mandatory training within Skillsgate including GDPR and Cyber Security training.	M	To arrange with OD to set up all casual staff access to Skillsgate for all mandatory units. Once established ensure all casual staff have completed this	Homeless Accommodation Manager & Assistant Homeless Accommodation Manager	30 June 2020 / 30 September 2020			First informal follow-up scheduled.
E1903	Homeless Accommodation (Substantial)	Recommendation 3 - Individual training undertaken without Organisational Development involvement should be logged accordingly.	M	To establish system to collate and notify OD quarterly of training directly arranged on an ongoing basis.	Homeless Accommodation Manager & Assistant Homeless Accommodation Manager	30 June 2020			First informal follow-up scheduled.
G1902	Treasury Management (Substantial)	Recommendation 1 - Risks should be reviewed by another officer in the absence of the risk owner, in line with the Corporate Risk Management Policy.	M	Risk Register contact details to be updated to include a Deputy should the Risk Owner be absent for any reason. Risk Management Assurance Framework to be updated to ensure deputy risk owners are nominated.	Principal Accountant/ Office Manager & PA to Chief Executive	01 July 2020			First informal follow-up scheduled.
G1902	Treasury Management (Substantial)	Recommendation 2 - Access to the Accountancy Drive and the folders within this including treasury management should be reviewed and restricted to officers who only need access.	M	Password protection to be added to the master cash flow spreadsheet and the password shared with relevant officers. Restrictions were previously in place to limit access for certain individuals to specific folders only. Unsure when or why these have been removed. A review of access to the Accountancy drive to be undertaken with IT and access restricted again where required. Roll out to Office 365 would resolve this going forward.	Technical Finance Officer / Principal Accountant	May 2020 / October 2020			First informal follow-up scheduled.
G1903	NNDR (Substantial)	Recommendation 1 – Job descriptions should be updated to reflect the current roles and reporting lines	M	Job Descriptions to be reviewed and amended as required	Revenues and Benefits Operations Manager	30th June 2020			First informal follow-up scheduled.
G1903	NNDR (Substantial)	Recommendation 2 – Appraisals should be undertaken with all officers and the appraisal documents should be completed timely and processed in line with the Council's processes.	M	Appraisals to be held for Team Leaders / Team Appraisal to be determined for completion	Revenues and Benefits Operations Manager	30th June 2020			First informal follow-up scheduled.
G1903	NNDR (Substantial)	Recommendation 3 – Action should be taken to ensure electronic records containing sensitive personal information can be deleted within acceptable timeframes	M	Subject to suitable software upgrades providing functionality, retention schedule to be reviewed to reflect record deletion timescales	Revenues and Benefits Operations Manager	31st December 2020			First informal follow-up scheduled.
A1902	Absence Management (Partial)	Recommendation 1 – the policy should be reviewed on a regular basis and managers should be made aware of any amendments.	M	Initial review to be carried out (see Recommendation 3). Review date to be included in new policy (suggestion likely to be every two years)	HR Manager	31 st December 2020.			Formal follow-up scheduled

A1902	Absence Management (Partial)	Recommendation 2 – The current training provision should be reviewed to avoid duplication, as well as ensuring any amendments made to the policy are incorporated into future training.	M	Training will be provided once new policy is developed and approved. Will roll out through VAR Management briefing but then look at Skillsgate modules as well as regular Managers' sessions.	HR Manager and Organisational Development Manager	31 st March 2021			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 3 – the policy should be revised to ensure it can deliver a consistent and fair approach, including incorporation of actions to address the issues identified within this audit.	H	Task and finish group has been established made up of members and HR to review. First virtual meeting scheduled w/c 15 th June 2020	HR Manager	31 st December 2020			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 4 – Current responsibilities should be reviewed to ensure all are still appropriate and streamlined where possible. Retained responsibilities should be documented in the policy.	M	As Recommendation 3 review of Policy will ensure responsibilities are reviewed and made clear in the policy document.	HR Manager	31 st December 2020			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 5 - A process should be adopted to ensure regular formal communication between responsible functions, including maintaining a list of agreed actions	M	As Recommendation 3 review of Policy will ensure clarity of responsibility and trigger points will allow for easier monitoring and action.	HR Manager	31 st December 2020			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 6 – Absence information should be reported to BTSP on a more frequent (quarterly) basis when sickness levels rise above target levels. (subject to the agreement of the Chair of the Panel).	M	Agreed that from January 2021 this will be in place – following review and implementation of the new Policy (subject to agreement from BTSP Chair)	HR Manager	31 st January 2021			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 7 – Template forms should be revised and consideration should be given to developing a more intuitive electronic process.	H	As Recommendation 3 review of Policy will ensure new and easier forms & recoding methods. Every attempt will be made to utilise our current systems and/or electronic reporting.	HR Manager	31 st December 2020			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 8 – Monitoring, training and support should be provided to managers to ensure a consistent approach is taken towards managing individuals who have hit key trigger points.	H	As Recommendation 4 review of Policy will ensure new and easier triggers and policy should limit any ambiguity.	HR Manager	31 st March 2021			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 9 – Reference to the employee privacy statement should be included on absence management notification forms	M	Reference to be made on all forms which share personal information. Wording to be agreed between Information Governance Manager and HR Manager.	Information Governance Manager & HR Manager	31 st December 2020			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 10– Retention periods should be reviewed to ensure they are aligned with all relevant legislation and guidance	M	Retention periods to be reviewed and agreed with Information Governance Manager and OH Provider.	HR Manager & Information Governance Manager	31 st December 2020 (could be earlier as not dependent on Policy review)			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 11 – A process for ensuring absence information is retained in one location by Human Resources (avoiding duplicate records) should be undertaken, including ensuring information is deleted once it has expired.	H	HR and Payroll are moving to electronic only records. All referrals and absence related data should only be kept by HR and Payroll and revised policy will include sections on data retention.	HR Manager	31 st December 2020 (could be earlier as not dependent on Policy review)			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 12 – the service level agreement in relation to Physiotherapy should be updated and include reference to data protection legislation	M	The service level agreement in relation to Physiotherapy should be updated and include reference to data protection legislation.	H&S Manager and Legal	31 st December 2020 (could be earlier as not dependent on Policy review)			Formal follow-up scheduled
A1902	Absence Management (Partial)	Recommendation 13 – all third parties handling sensitive personal absence data should be required to complete the Information Governance Manager's questionnaire.	M	This to form part of the OH and third-party contracting processes.	H&S Manager	31 st December 2020 (could be earlier as not dependent on Policy review)			Formal follow-up scheduled

A2001	Environmental Strategy - Baseline Data (Partial)	Recommendation 1 – A documented Project/Activity Action Plan should be developed to clearly communicate objectives, required actions, responsibilities, timescales and inform risk management activity related to Environmental Strategy data collection/assessment activity and reporting.	H	An action plan to complete the organisational carbon footprint is being progressed, this plan will be a detailed sub-plan of an action in the Policy & Communication Service Plan. This plan will allocate roles and set a timescale for the completion of the work.	Policy & Communication	31/07/2020			Formal follow-up scheduled
A2001	Environmental Strategy - Baseline Data (Partial)	Recommendation 2 – Clear and comprehensive local data definitions should be formally developed relevant to the City Council to inform and support Environmental Strategy data collection/assessment activity and reporting.	H	Ongoing work to formally develop local data definitions will be completed and definitions will be subject to regular review/revision as data availability/maturity improves.	Policy & Communication	31/08/2020			Formal follow-up scheduled
A2001	Environmental Strategy - Baseline Data (Partial)	Recommendation 3 – Details and arrangements for the completion of data quality activity should be developed and communicated accordingly.	M	Policy and Communications Team arrangements and responsibilities for ensuring the quality of data processed by the Team in accordance with local data definitions will be developed and communicated to team members. The Policy and Communications Team will develop a dashboard to monitor data quality and highlight issues to be followed up with source data owners.	Policy & Communication	31/08/2020			Formal follow-up scheduled
A2001	Environmental Strategy - Baseline Data (Partial)	Recommendation 4 - The process and associated responsibilities for monitoring and managing data collection, assessment and reporting activity should be developed and communicated accordingly.	M	The Policy and Communications Team process and associated responsibilities for monitoring and managing data collection, assessment and reporting in accordance with local data definitions will be developed. This will be communicated to Policy and Communications Team members and shared with source data owners.	Policy & Communication	31/08/2020			Formal follow-up scheduled
F2002	Insurance (Reasonable)	Recommendation 1: Procedures / guidance should be documented to cover the Finance Officer's (Corporate Insurance & Governance) role.	M	A procedure manual and guidance notes are in the process of being completed and will be undertaken alongside the main activities as they occur. This was put in place prior to the audit as a succession planning strategy.	Financial Services Manager	31/03/2021			First informal follow-up scheduled.
F2002	Insurance (Reasonable)	Recommendation 2: The Risk Management Sub-Group should ensure suitable tracking of outstanding actions and meeting minutes should be formally recorded as presented to the Corporate Risk Management Group (CRMG).	M	Agreed	Office Manager and PA to Chief Executive	30/09/2020			First informal follow-up scheduled.
F2002	Insurance (Reasonable)	Recommendation 3: Access to the insurance documentation should be reviewed and restricted to appropriate officers only.	M	Agreed – This has been completed	Financial Services Manager	31/08/2020			First informal follow-up scheduled.
F2002	Insurance (Reasonable)	Recommendation 4: All relevant officers should receive formal training to ensure full compliance with the Council's Managing Occupational Road Risk Policy. Ongoing monitoring should continue to take place to ensure that all incidents / accidents are appropriately recorded and reported.	M	Further & ongoing training for staff in terms of road risk, standards and incident reporting and training / briefings to support managers. Ongoing monitoring to ensure compliance. The approved Handbook for Drivers (approved by SMT) will be circulated to all drivers, relevant managers and supervisors.	Fleet & Depot Manager	31/12/2020			First informal follow-up scheduled.
F2002	Insurance (Reasonable)	Recommendation 5: Guidance should be issued to officers to ensure that the Finance Officer (Corporate Insurance & Governance) receives copies of all third party insurance documentation to ensure appropriate cover is in place.	M	Agreed – A reminder will be issued to appropriate officers.	Financial Services Manager	30/09/2020			First informal follow-up scheduled.

M2001	Fees & Charges - VFM (Reasonable)	Recommendation 1 Formal records of annual fees and charges review activity should be created and retained to demonstrate consideration of all elements and principles of the Corporate Charging Policy.	M	Corporate Charging Policy will be amended to incorporate a requirement for records of review activity to be retained.	Corporate Director of Finance and Resources (supported by Principal Accountant)	31-Jul-21			First informal follow-up scheduled.
M2001	Fees & Charges - VFM (Reasonable)	Recommendation 2 Annual Fees and Charges reports prepared/presented in accordance the Corporate Charging Policy should be required to include content to demonstrate how all elements and principles of the policy have been considered/applied in each service area.	M	Corporate Charging Policy will be amended to incorporate a requirement for annual fees/charges review reports to include content to demonstrate/confirm all policy elements and principles have been considered/applied.	Corporate Director of Finance and Resources (supported by Principal Accountant)	31-Jul-21			First informal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 1 - The Firewall Management Procedure (policy) should be reviewed to include other key issues e.g. procurement, frequency, completion and management of independent penetration testing review, conditions for and completion of internal vulnerability testing / checks including monitoring, results and action(s) taken.	M	Update Policies and implement regular reviews around policies, external penetration testing (including remedial actions). Create a centralised log of reviews taking place and actions taken. Create Centralised Calendar for reviews with dates and times accordingly	ICT Services Manager	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 2 - A Change Management policy should be drafted.	M	Update change management policy with a specific policy for firewalls	ICT Services Manager	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 3 - Key ICT policies should be approved by Executive Management and / or Elected Members.	M	Seek approval of key policies Executive Management and / or Elected Members	ICT Services Manager	1 st May 2019			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 4 - Review the action(s) planned and the target dates in the ICT Services Risk Register.	M	Carry out regular reviews of the Corporate ICT risk register and send updates to policy & performance who update this.	ICT Services Manager	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 5 - ICT should formally agreed and document operational arrangements with the external supplier (TNP).	H	Speak to TNP and get a written statement of understanding/SLA around support	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 6 - ICT management should ensure an appropriate management framework is established to oversee operations and management of the Sonicwall firewall.	H	Speak to Elitetele and get a written statement of understanding around support	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 7 - Change management procedures should be drafted, approved and implemented. Firewall specific testing should be formally recorded and attached to the Service Desk (Remedyforce) application records.	H	Formalise change management procedures for the firewall including roles and responsibilities. Rule checking and testing should be documented and formalised. Formalise rule testing as part of change management	ICT Lead Officer (Infrastructure)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 8 - Day-to-day management tasks should be documented and diarised accordingly. In addition to this ICT management should ensure others members of ICT undertake tasks on a rotational basis to aid familiarity.	M	Update/document all firewall management tasks. Firewall changes to be checked by a 2nd officer once done and signed off in the change management call in Remedyforce	ICT Lead Officer (Infrastructure)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 9 - ICT should ensure the configuration of the Fortiguard (firewall) application is documented. This documentation would in the event of a need to re-install software ensure all agreed settings are known.	M	Document the firewall configuration e.g. ports used connectivity etc and show changed from default config.	ICT Lead Officer (Infrastructure)	1 st June 2019			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 10 - ICT should ensure all connected network devices are documented and subject to a periodic evidenced review.	M	Document all network devices and configuration for them.	ICT Lead Officer (Infrastructure)	30-Sep-19			First formal follow-up scheduled.

N1801	Firewall (Partial)	Recommendation 11 - ICT should complete the work surrounding monitoring the Windows Defender Anti-Virus software as soon as possible and establish processes for managing any exceptions identified.	M	Continue to deploy Windows Defender ATP on devices and enhance configuration	ICT Lead Officer (Infrastructure)	30-Sep-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 12 - ICT Management review the Incident Management Procedure (Policy) ensuring it relates to the Council's structures and operations.	M	Incident management policy to be reviewed and ensure reporting structure is accurate	ICT Lead Officer (Service Support)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 13 - ICT Management should take steps to put in place a contract for the services provided by TNP.	H	Speak to TNP and Elitetele around a formal contract for support. Support agreement is in place and evidenced but is around support hours etc.	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 14 - ICT Management should take urgent action to address leaving the automatic fire protection system in automatic mode when individuals / external suppliers are working in the computer suite unattended. In addition to this logs should be established for access / work completed in the computer suite. On a periodical basis this should be reviewed by management to confirm it is completed and adhered to by all staff and third parties. Finally, server cabinets should be made secure.	M	Implement sign in system for external contractors explaining the use of FM200 in the datacentre. Refresh training for ICT staff on FM200 system. Ensure where there is a risk of accidental system activation that it is put into manual during the work period and activated afterwards Computer room is in a secure fob area with CCTV. Cabinet doors won't fit due to newer fibre patch leads more rigid than the older ones. Adjusting door hinges so door will fit and if not possible will look at moving firewall to a different cabinet with lockable door at next refresh in Summer 2019. Implement sign-in system for external contractors. Additional IT only fob on build room/computer room door. Signage on all doors and procedures that no-one can enter without being escorted by ICT Services and approval	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 15 - ICT Management should establish a framework for managing the request, completion and action(s) identified for external testing completed. Specifically the following should be addressed: 1) Managing reports received highlighting responsibilities, timescales for action(s) identified by category, records to be maintained with evidence, reporting as well as long term monitoring (if applicable). 2) Restricting access to reports and action(s) to ICT staff with specific responsibilities for this area. 3) Ensuring summary information on outcomes and action(s) taken with reports received are issued to the Senior Management Team and Elected Members accordingly.	H	Document the management procedure for external ICT Health check reports / Review and update Remedial actions plans from ICT health check / Folder on K Drive now locked down to specific individuals who need access - ICT Management & infrastructure only. This will be carried forward when moved to SharePoint as it contains Penetration testing reports etc which are security sensitive. / Use Remedyforce for all change management/incidents relating to firewalls and reference this when producing management reports / Implement a governance framework for reporting outcomes and remedial action plans of external testing with SMT	ICT Lead Officer (Infrastructure)	01 May 2019			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 16 - ICT Management should ensure significant network incidents are handled as required via the agreed incident management policy and reported.	H	Network core issue in November wasn't raised retrospectively in Remedyforce. Senior management were kept informed and staff were updated accordingly. All incidents will be documented.	ICT Lead Officer (Infrastructure)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 17 - Management should develop firewall incident specific procedures for such events with first steps clearly documented.	H	Create an incident management process for firewall incidents specifically and ensure staff are aware	ICT Lead Officer (Service Support)	01-May-19			First formal follow-up scheduled.

N1801	Firewall (Partial)	Recommendation 18 - ICT should ensure the issue relating to installing the latest Fortiguard (firewall) application software is formally tracked. The reasons for not installing the latest version should be formally documented and signed off by senior management.	M	Review console in infrastructure meetings based on FortiGate release schedule. Remedyforce regular task and liaise with TNP over suitable software versions so they are installed promptly / Current version is minor release and TNP advised against it as they had seen issues in their testing and at other clients. /Reviews and reasons need documented in Remedyforce	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 19 - Steps should be taken to ensure the backup process for the Fortiguard (firewall) application is formalised with a copy stored outside of the Fortiguard environment.	M	Take weekly off-device firewall backups through the console and seek advice from TNP whether this can be automated. Backups are created automatically on the devices but are then not stored off-device. Create a Remedyforce regular task and document procedure.	ICT Lead Officer (Infrastructure)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 20 - ICT should look to deploy a solution relating to the management of network devices and logs produced as soon as possible. A suitable management framework should be in place to report on alerts accordingly.	M	SIEM solution currently being evaluated for central log management/alerting	ICT Services Manager	01-Jul-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 21 - ICT should look to implement a firewall solution between the Council and Allerdale Borough Council.	M	Investigate enabling the ASA's firewall functions on both Allerdale and Carlisle devices already in place, beyond the current IP address limiting functions to control traffic. Need agreement from Allerdale BC and steer on R&BS shared service as this may impact service and replication speeds.	ICT Lead Officer (Infrastructure)	01-Sep-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 22 - Firewall security for the FortiGate solution should be reviewed and action taken to address the weaknesses identified.	H	Implement password changes on all firewalls every 3-6 months and document when they have taken place. Use remedy force regular tasks to ensure regular changes take place / Implement password complexity settings available in firewall /Implement idle time out override to 30 mins / Speak to TNP and get a written statement of understanding around support / Carry out regular reviews of firewall admin accounts and document reviews - Use Remedyforce regular tasks and review same time as password changes / Implement management audit log reporting/alerting via SMTP to Remedyforce / Update procedures for firewall admin account approval - must be signed off by head of ICT Services	ICT Lead Officer (Infrastructure)	01-May-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 23 - Firewall rule management for the FortiGate solution should be reviewed and action taken to address the weaknesses identified.	H	Update descriptions on all rules and review external supplier rules on a regular basis using Remedyforce tasks / Rule rationalisation exercise need to be completed./Update descriptions on all rules as part of rule rationalisation project. / Create a central review repository that is updated when regular reviews take place use Remedyforce regular tasks baseline against last set number of rules. / Document all rules and carry out 6 monthly review to confirm additions/deletions. All changes must go through Remedyforce change control.	ICT Lead Officer (Infrastructure)	31-Mar-19			First formal follow-up scheduled.

N1801	Firewall (Partial)	Recommendation 24 - Alerts should be defined for the FortiGate firewall for any key failures / events. In addition to this ICT Management should consider using visual displays in the main ICT office to alert staff of any key failures / events on the firewall.	H	Implement SMTP alerts for Critical and High alerts to come to Infrastructure and automatically into Remedyforce for assignment/investigation. Look at an Alert display in the ICT office with the SIEM solution to show alerts.	ICT Lead Officer (Infrastructure)	30-Sep-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 25 - Internal vulnerability testing should be established urgently. ICT Management should agree and document the processes and management framework for undertaking internal vulnerability testing, storing and recoding and remedial action(s) as well as securing outputs and evidence.	H	Framework to be designed and signed off by SMT / Security folder on K Drive now locked down to specific individuals who need access - ICT Management & infrastructure only. This will be carried forward when moved to SharePoint as it contains Penetration testing reports etc which are security sensitive. Any remedial actions plans need referenced back to Remedyforce.	ICT Services Manager / ICT Lead Officer (Infrastructure)	30-Sep-19			First formal follow-up scheduled.
N1801	Firewall (Partial)	Recommendation 26 - Steps should be taken to review the storage of log information for the Fortianalyzer solution and alerting should be established for significant / key events.	M	Check current retention schedules. Speak to TNP to see if auto-archiving can be implemented / Implement SMTP alerts for Critical and High alerts to come to Infrastructure and automatically into Remedyforce for assignment/investigation.	ICT Lead Officer (Infrastructure)	01-Jun-19			First formal follow-up scheduled.

Recommendation evidenced as actioned (Closed)
Recommendations evidenced as part actioned and replaced by new recommendation (Closed)
Recommendation not appropriate for follow up e.g. relates to one off scheme (Closed)
Formal Audit follow up scheduled
Management Statement scheduled to request evidence of implementation
Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
Follow up scheduled for recommendation previously identified as unactioned
Recommendation reviewed and not confirmed as actioned (no response/revised timescales have passed)