

# Report to Audit Committee

Meeting Date: 17 March 2023  
Portfolio: Finance, Governance and Resources  
Key Decision: Not applicable  
Within Policy and  
Budget Framework YES  
Public / Private Public

Title: INTERNAL AUDIT PROGRESS 2022/23 (DECEMBER-MARCH)

Report of: CORPORATE DIRECTOR FINANCE & RESOURCES

Report Number: RD70/22

## **Purpose / Summary:**

This report provides an overview of the work carried out by Internal Audit between December and March of 2022/23. The report also includes information on progress against previous audit recommendations.

## **Recommendations:**

The Committee is requested to

- i) note the progress against the audit plan for 2022/23;
- ii) receive the final audit assignments as outlined in paragraph 2.2;
- iii) note the progress made on audit recommendations to date outlined in Appendix 1.

## **Tracking**

Audit Committee:	<b>16 March 2023</b>
Scrutiny Panel:	<b>Not applicable</b>
Council:	<b>Not applicable</b>

## **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.

## **2. PROGRESS AGAINST AUDIT PLAN**

- 2.1 The final outcomes against the audit plan, including performance indicators are recorded in the draft Internal Audit Annual Report (RD65/22).
- 2.2 Four planned pieces of work were finalised in the period.

<b>Review Area</b>	<b>Assurance Level</b>
National Non Domestic Rates	Reasonable
Neighbourhood Services (Culture)	Reasonable
Car Parking Income	Reasonable
Town Deal - Business Assurance Framework (To follow)	Reasonable

### **Outstanding Reviews**

- 2.3 An audit of building maintenance is still in progress and work on Property Income (Follow-up) and annual fraud review are due to start in March. All three reviews are expected to be finalised prior to the cessation of the Council on 31<sup>st</sup> March 2023. The findings of these reviews will be reported to the first meeting of Cumberland Council's Audit Committee (the findings of which will all be equally relevant to the new authority), with copies of final reports circulated to the Carlisle Audit Committee Members for information.

### **ICT Services**

- 2.4 It was agreed with Senior Management that the proposed formal follow-up of ICT recommendations would not currently add value, as the majority of actions would now be reviewed as part of the LGR process. Progress on recommendations has been reviewed informally as part of Internal Audit's routine quarterly follow-up of agreed actions (See section 3).

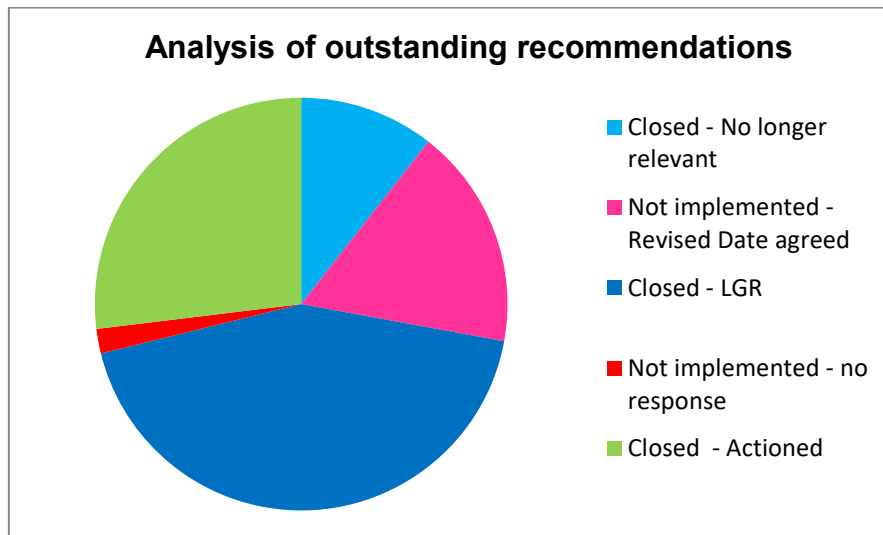
- 2.5 A Local Government Reorganisation ICT workstream consisting of ICT managers across Cumbria, meet once a week. Robust governance arrangements are in place to manage, approve and assign ICT work packages in the lead up to vesting day and beyond.
- 2.6 Following audits of Cyber Security and ICT Services in 2022, there were five high grade recommendations outstanding. One has been actioned and four remain live. Ownership of the recommendations remains with Carlisle City Council until 1st April, although they are unlikely to be actioned before this. Management have informed the LGR workstream on all key ICT issues, including the nature of the four high-grade recommendations and they are all being managed appropriately.

### **Sustainable Warmth Grant**

- 2.7 An Audit of the Sustainable Warmth Grant was reported to the previous audit committee. An update on the project has been reported to the People Scrutiny Panel on 23 February 2023, outlining progress made, with approximately £1M expenditure now incurred, with further commitments in place. While the Council is unlikely to utilise all the expenditure on the project, it is looking to maximise use of the grant and is in negotiation for an extension with Department for Energy Security & Net Zero. If the extension is renewed Internal Audit will liaise with responsible officers to determine what further assurances are required for ongoing delivery of this project.

## **3 AUDIT RECOMMENDATIONS**

- 3.1 **Appendix 1** shows a summary position of outstanding audit recommendations and progress made against implementing these. Once the agreed implementation date has passed, Internal Audit asks 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.
- 3.2 As reported at the previous audit committee meeting, due to difficulties in obtaining responses and progressing agreed actions, Internal Audit has met individually with responsible managers for each outstanding recommendation, the outcome of which is included in Appendix 1 and summarised below.



3.3 45 out 106 recommendations followed up will not be completed prior to 31 March, as a result of LGR. These will be reviewed and included in a composite schedule of outstanding actions inherited by Cumberland Council and subject to ongoing review.

3.4 28 recommendations were found to have been fully implemented and incomplete or no responses were only recorded for 2 recommendations, indicating significant improvements to responses as a result of the work undertaken by Internal Audit during the period.

#### **4. RISKS**

4.1 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.

#### **5. CONSULTATION**

5.1 not applicable

#### **6. CONCLUSION AND REASONS FOR RECOMMENDATIONS**

The Committee is requested to

- i) note the progress against the audit plan for 2022/23;
- ii) receive the final audit assignments as outlined in paragraph 2.3;
- iii) note the progress made on audit recommendations to date outlined in Appendix 1.

#### **7. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES**

7.1 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.

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**Appendices attached to report:**

1. Internal Audit Report – National Non Domestic Rates (RD.71/22)
2. Internal Audit Report – Neighbourhood Services (Culture) Follow Up
3. Internal Audit – Car Parking Income
4. Internal Audit – Town Deal (Business Assurance Framework)

**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**



# Appendix A

Ass Code	Audit	Directorate	Recommendation	Priority	Risk Exposure	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	Status
G2005	Payroll (Reasonable)	Community Services	Recommendation 1 – Review of staff procedure notes, and wider suite of policies, guidance documents and forms on the intranet to ensure alignment to financial regulations, clarity for new members of staff, and regular update.	M	Service cannot wholly demonstrate that they have interpreted and applied the financial regulations that relate to payroll. / New staff are unclear on how to run payroll at short notice. / Key forms and documents are not current	Ensure that there are clear procedure and guidance documents for payroll staff, that align to financial regulations. Ensure that documents and forms are updated on the intranet and dated so that all staff know they are using/viewing the most update version.	HR Manager /Payroll & i-Trent Supervisor	31-Mar-22	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2005	Payroll (Reasonable)	Community Services	Recommendation 2 – Review the critical service recovery arrangements to ensure that there are fully tested and documented planning arrangements in place for all key scenarios, that can be actioned at short notice.	M	Payroll unable to be run. Comprehensive planning not in place for alternative arrangements.	Review the critical service recovery arrangements and agree on a plan and ensure it is documented.	Deputy TC & CE /HR Manager /Payroll & i-Trent Supervisor	31-Dec-21	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
D2001	Community Centres (Reasonable)	Community Services	Recommendation 2 - To develop a training program to provide updated Trustee training for elected members and appointees who have roles on the various Charitable Trust Boards	M	Risk of inappropriate and inconsistent Governance arrangements across the Community Centres	Contact APSE to arrange Trustee training for elected members and appointees who have roles on Charitable Trust Boards.	Healthy City Team Manager	30/12/21	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
D2001	Community Centres (Reasonable)	Community Services	Recommendation 7 – To ensure that updated lease agreements are put into place with appropriate maintenance and improvement criteria clauses incorporated.	M	Risk of Council Assets not being utilised and managed in an appropriate manner as set out in the SLA and funding arrangements	Work with the property team to ensure that update lease agreements are in place. /Implement monitoring of lease to under lease expiry dates.	Property Services Manager	01/04/22	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
I2201	Absence Management	Community Services	Recommendation 1 – Training methods to be proportionate and effective use of HR Officers' time.	M	Improving attendance policy is not being followed because service managers have not received satisfactory training.	Training delivery methods will be reviewed and agreed in conjunction with the Head of Workforce Development to ensure the delivery methods are proportionate taking account of modern delivery methods and the transition to the new authority and likely new absence management policy / procedures.	HR Manager / Head of Workforce Development	31 August 2022		Recommendation evidenced as actioned (Closed)
I2201	Absence Management	Community Services	Recommendation 2 – Management to regularly document confirmation of document disposal in line with the retention schedule.	M	Breach of UK GDPR and possibility of sanctions.	HR are in the process of reviewing data held and managing and disposing of data in accordance with the retention schedule. This is a medium-term project underpinned by the requirements of the pending TUPE transfer	HR Manager	31 January 2023	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
I2201	Absence Management	Community Services	Recommendation 3 – HR to periodically remind services that no personal information relating to absence management should be retained locally.	M	Breach of UK GDPR and possibility of sanctions.	HR has added this requirement to the list of regular reminders to managers which are sent quarterly.	HR Manager	31/07/2023 And quarterly thereafter.	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
J2104	Procurement (Counter-Fraud)	Finance & Resources	Recommendation 5 – Recruitment processes should be adhered to, including the collection of appropriate references.	Medium	Council employs individual previously engaged in unethical or fraudulent behaviour.	To revisit process with team and instigate monitoring with immediate effect. Additional resourcing to be identified to support role.	Head of HR and Payroll	25 May 2022	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
J2104	Procurement (Counter-Fraud)	Finance & Resources	Recommendation 6 – The Council should consider whether posts attracting a degree of fiscal responsibility should be subject to disclosure checks.	Medium	Council employs individual previously engaged in unethical or fraudulent behaviour.	All new employees offered roles from 1st June will be subject to basic disclosure checks as minimum.	Head of HR and Payroll	01 June 2022		Recommendation evidenced as actioned (Closed)
B2103	Recycling (Perf Info)	Neighbourhood Services	Recommendation 1: Guidance should be documented for all tasks relating to recycling performance information and should include relevant records management metadata (review date, version control and author).	M	If procedures are not clearly documented, officers may be unsure of their roles and responsibilities and incorrect practices may occur that may lead to inaccurate information or reputational damage to the Council.	Most of this has already been completed. There is just the Waste Data Flow procedure left to complete.	Team Manager – Technical Services	30 June 2022		Recommendation evidenced as actioned (Closed)
D2101	Development Management (Complaints)	Economic Development	Recommendation 1 - The SharePoint complaints tracker for development management complaints should be set up along with documented guidance for both staff and public to use.	H	If processes and procedures are not clearly set up and documented, officers may be unsure of their roles and responsibilities and incorrect practices may occur that may lead to inaccurate information or financial or reputational damage to the Council.	Set up the Share Point system and train relevant staff on the procedures along with guidance	Head of Development Management	31 June 2022		No response to update request
D2101	Development Management (Complaints)	Economic Development	Recommendation 2 - Development Management should publish their complaints document retention information in the Council's Document Retention Schedule and in their privacy notice which should be published on the Council's website as soon as possible.	M	Failure to adhere to all relevant statutory requirements and breach of data protection legislation through failure to adequately notify individuals on how data will be processed.	Draft policy requires revisions and uploading to website in liaison with the Council's DPO	Head of Development Management	31 August 2022		No response to update request

Ass Code	Audit	Directorate	Recommendation	Priority	Risk Exposure	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	Status
B2201	Bereavement Services	Community Services	All procedures should be reviewed and brought up to date where appropriate. They should include version control, date, author, and a review date.	M	If procedures are not clearly documented, officers may be unsure of their roles and responsibilities and incorrect practices may occur this may lead to complaints and reputational damage to the Council.	Review and agree a list of service procedures/ Completed documented procedures in place for Bereavement Services with appropriate version control, date, author and review dates	Bereavement Services Manager	16.01.23	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
B2201	Bereavement Services	Community Services	Risks should be regularly reviewed in line with the Corporate Risk Management and Assurance Framework.	M	If risks are not regularly monitored there is a risk that Council priorities are not achieved / supported.	Risks reviewed on a quarterly basis in line with the Corporate Risk Management and Assurance Framework.	Bereavement Services Manager	31.01.23	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The 2022/23 fees and charges for Bereavement Services should be uploaded to the Council's Website.	M	There is a risk of reputational damage to the Council and customer complaints if fees and charges on the website are not up to date.	IT contacted to request access & guidance to upload 2022/23 fees & charges.	Bereavement Services Manager	16.12.22		Recommendation evidenced as actioned (Closed)
B2201	Bereavement Services	Community Services	In light of the upcoming Local Government Reorganisation (LGR) it is recommended that an appropriate action plan be agreed by both service managers to cover how sensitive information will be securely shared if required.	M	Non-compliance with GDPR legislation resulting in service user details being shared without permission.	Data sharing agreement completed by both service managers to cover how sensitive information will be securely shared if required prior to 1/04/2023.	Bereavement Services Manager	16.12.22	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The following should be completed to ensure compliance with GDPR legislation: - Both paper and electronic document retention should be reviewed by the service to ensure compliance with current regulations. The documentation retention schedule and privacy statement should be aligned to this. A document destruction/ disposal log should be introduced/ -All documentation containing personal data should be stored securely/ Due to LGR it is recommended that the service contacts Information Governance for guidance as to how best to cover the council when sharing data with third parties to ensure compliance with GDPR legislation/ - a review of all forms used by the service should be undertaken to ensure that all documentation covers the Council in relating to GDPR and data sharing.	M	Non-compliance with GDPR legislation and failure to control records management.	Document retention is reviewed and aligned to legislation and the retention scheduled and privacy statement updated accordingly/ -Implement A document storage procedure/ Meeting to be set up with Data Protection/ Information Governance for guidance and actioning of this recommendation/ All forms to be reviewed and updated to cover the Council in relation to GDPR and data sharing	Bereavement Services Manager	31.01.23/ 31.01.23/ 16.12.22/ 31.01.22	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	ITC Services should be advised of the location of the datacentre and where the data is stored (geo location) for the BACAS system.	M	Non-compliance with GDPR legislation and failure to control records management.	Request information from ClearSkies and advise ITC of outcome to ensure that this is satisfactory.	Bereavement Services Manager	31.12.22	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The Bereavement Services Manager should be set up with a user ID for BACAS and complete system training in order to be able to use the system efficiently to support the team when required.	M	Customer Service may be impacted in the event of staff absence / shortages.	User ID set up and training undertaken by BACAS.	Bereavement Services Manager	30.11.22	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	A review of the team's training should be completed to ensure that all relevant areas have been covered and that new team members received all the appropriate training to support them in their roles.	M	Failure to identify and act upon ways to improve service delivery.	Team training reviewed and a team training plan agreed for 2023/24.	Bereavement Services Manager	31.03.23		Recommendation evidenced as actioned (Closed)
B2201	Bereavement Services	Community Services	All health and safety risk assessments, safe systems of working and the Premises Handbook should be reviewed and brought up to date as appropriate.	M	Failure to meet Council's procedures / guidance on health & safety for the service which may lead to staff and members of the public being put at risk	Review and update health and safety risk assessments and safe systems of work/ Review and update the Premises Handbook in conjunction with Property Services to clearly define roles and responsibilities	Bereavement Services Manager	31.03.23	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The Surveillance Camera Operating Procedure should be completed. The signage should be updated in line with the new Cumberland Council's Surveillance Policy.	M	Non-compliance with council procedures and GDPR legislation.	The Surveillance Camera Operating Procedure completed, documented and signage updated.	Bereavement Services Manager	28.02.23	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The medical referees should provide assurances that appropriate lone working procedures are in place when they are visiting Council premises out of hours.	M	Non-compliance with Council procedures and failure to be aware of all factors affecting the facilities.	A copy of the medical referees lone working procedures provided.	Bereavement Services Manager	31.01.23	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2201	Bereavement Services	Community Services	The fob access report should be reviewed and anyone who no longer requires access should be removed.	M	Unauthorised access to the Council premises.	Fob access report reviewed, and access removed for all individuals who no longer require access.	Bereavement Services Manager	30.11.22	31.01.23	Recommendation evidenced as actioned (Closed)
B2101	Sands Centre Development	Neighbourhood Services	1 - Review reasons for overdue actions	M	Actions not reviewed on a timely basis	Actions recorded (with agreed deadlines) using the MS Planner will be reviewed at the start of each SCRIPT meeting	DCEO	10th May 2022 onwards		Recommendation no longer relevant due to change in circumstances (Closed)
B2101	Sands Centre Development	Neighbourhood Services	2 - Record acceptance of assigned responsibilities by the Project Board and wider project team members.	M	Reduced accountability and transparency of individual and group performance	A review of the 'assigned responsibilities' will be undertaken and a record of acceptance will be made.	DCEO	24th May 2022		Recommendation no longer relevant due to change in circumstances (Closed)
B2101	Sands Centre Development	Neighbourhood Services	3 - Project Board members to formally record regular review and agreement of the project risk register	M	Key risks escalate and Project Board members are unaware	A review of the project risks will be undertaken quarterly (or at more frequent intervals if necessary) and recorded at SCRIPT.	DCEO	24th May 2022		Recommendation no longer relevant due to change in circumstances (Closed)



Ass Code	Audit	Directorate	Recommendation	Priority	Risk Exposure	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	Status
M2002	Partnership VFM (Reasonable)	Community Services	Recommendation 2 – Once an approved strategy with agreed shared objectives and priorities has been established a framework for measuring progress against objectives should be designed and monitored by the Partnership on a regular basis, using a combination of narrative and quantitative measures	M	Failure to ensure suitable progress being made to achieve priorities.	Options to be discussed as part of preparation of Strategy, including potential Task and Finish Group and further consultation with Internal Audit.	Partnership Manager	31 June 2021		Recommendation evidenced as actioned (Closed)
A2202	Corporate Internal Controls	Corporate Support	Recommendation 1 - A review of the assignment of modules within Skillgate should be undertaken to maximise efficient and consistent allocation of modules.	M	Officers do not get assigned relevant training.	Managers are responsible for selecting the relevant modules from a list of regulatory identified by OD. The OD team will prompt selection of appropriate modules to ensure compliance. Changes have already been made to include those highlighted within this report	Head of Workforce Development	Actioned - 09/22		Recommendation evidenced as actioned (Closed)
G2105	Creditors	Finance & Resources	Recommendation 6 – Oversight of bank detail changes to verify the robustness of checks carried out.	H	Controls in place are not robust enough to detect fraudulent payments.	A review of the process for bank detail changes will be undertaken	Finance Officer (Systems Control and Development)	30 September 2022	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2004	Income (Reasonable)	Finance & Resources	Recommendation 2 – Arrangements, authorisation and limits for holding income within individual service areas should be formalised and documented.	M	Inadequate governance leading to non-compliance with Financial Procedure Rule requirements resulting in inconsistent practices and increased exposure to the risk of theft and fraud	Scheme of Delegations to be updated to include arrangements, authorisation and limits for holding income.	Financial Services Manager	30-Sep-21	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2004	Income (Reasonable)	Finance & Resources	Recommendation 3 – PCI-DSS non-compliance should be subject to formal risk assessment activity to identify and facilitate implementation of required controls, action planning and sources of assurance (both short and long-term).	H	Failure to comply with Payment Card Industry (PCI) Security Standards leading to loss or compromised data and resulting in fines or sanctions.	A risk assessment be completed for PCI-DSS non-compliance and added to the Corporate Risk Register	Financial Services Manager / Customer Services Manager	31-Dec-21	30.06.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
B2202	Fleet Management Strategy	Community Services	Recommendation 1 – Put an arrangement in place to demonstrate positive outcomes of key strategic objectives through seeking regular, verifiable, documented evidence.	M	Key service objectives are not being achieved and management are unaware.	Fleet Management Strategy to be refreshed/ Core KPI to be identified/ Quarterly internal reporting of performance against core KPI to be established	Fleet & Depot Manager	October 2022/ December 2022/ March 2023		Recommendation evidenced as actioned (Closed)
B2202	Fleet Management Strategy	Community Services	Recommendation 2 – Put an arrangement in place to verify compliance with relevant legislation and DVSA general guidance.	M	Possible sanctions through non-compliance with relevant legislation.	Monthly check-sheet to be developed/ Wider reporting of performance to be picked up as part of quarterly internal reporting above	Fleet & Depot Manager	December 2022/ March 2023		Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2202	Fleet Management Strategy	Community Services	Recommendation 3 – Review oversight arrangements for driving licence checks.	M	Possible sanctions through non-compliance with relevant legislation.	Reminder to be sent to all managers to reinforce their responsibilities for managing road risk for their staff in line with current policy, and to reference further information and advice eg Driver Handbook/ Driving licence checks is identified on the delivery/ risk plan for LCP	Fleet & Depot Manager	October 2022/ March 2023		Recommendation evidenced as actioned (Closed)
B2202	Fleet Management Strategy	Community Services	Recommendation 4 – Fleet Management to carry out a full review of driving assessment management.	M	Staff or member of the public suffers loss due to driver not operating Council vehicle effectively.	Trained assessors conduct driving assessments and document their findings. Upon completion, such documents are delivered to the Fleet Office within 24 hours for evaluation. Fleet engage with the relevant service manager to confirm a successful assessment or discuss further action if required	Fleet & Depot Manager	Closed		Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
B2202	Fleet Management Strategy	Community Services	Recommendation 5 – Proportional supporting evidence to be documented for fleet challenge and service reviews.	M	Financial loss and reputation damage to the Council because management are unable to demonstrate fleet, cost and carbon reduction in line with the planned Strategy	Template issued to client / user department in relation to fleet replacement.	Fleet & Depot Manager	September 2022		Recommendation evidenced as actioned (Closed)
D2002	City Centre (Reasonable)	Community Services	Recommendation 7: Delegated authority / responsibility for issuing pavement café licences should be included in the relevant Scheme of Delegation.	M	Pavement café licences may be granted / rejected without proper authorisation which may lead to reputational damage to the Council.	Health and Wellbeing Services Manager to include pavement café licences in the relevant Scheme of Delegation.	Health and Wellbeing Services Manager	29-Jan-21	30 August 2021	Recommendation evidenced as actioned (Closed)
D1901	Tullie House (Reasonable)	Community Services	Recommendation 8 – The Council should obtain assurances that performance information represents value for money and continuous improvement	M	Failure to ensure delivery of VFM.	To be discussed at next contract monitoring meeting and actions agreed and recorded	Health & Well-Being Manager	26-Feb-20	31 March 2021	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
A1802	Smarter Service Delivery (Reasonable)	Corporate Support	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	Council in possession of unnecessary personal information. Risk of breaching data protection legislation. Risk of fines and sanctions	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	30.06.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2103	Council Tax	Finance & Resources	Recommendation 1 – Wider management team to regularly and accurately document service risks.	M	Key risks may not be identified or correctly assessed.	Review of risks considered collectively previously and risks deemed to be appropriate. Further internal review to be undertaken in 2022/23	Head of Revenues & Benefits	30th November 2022		Recommendation evidenced as actioned (Closed)

Ass Code	Audit	Directorate	Recommendation	Priority	Risk Exposure	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	Status
G2103	Council Tax	Finance & Resources	Recommendation 2 – Consider whether the draft Collection and Recovery Policy should be finalised and published.	M	Reduced level of staff direction.	Consideration to be made during 2022/23, which may assist LGR preparation for Cumberland Council	Recovery Team Leader	31st January 2023		Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2103	Council Tax	Finance & Resources	Recommendation 3 – Systems Support Team to apply the Academy system archiving tool.	M	Non-compliance with UK GDPR.	Consideration to be given, after priority requirements have been implemented for LGR	Systems Support & Controls Manager	30th November 2023	30th November 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2103	Council Tax	Finance & Resources	Recommendation 4 – Consider if any proportionate additions or updating to service guidance is required.	M	Reduced level of staff direction.	Consideration to be made during 2022/23, which may assist LGR preparation for Cumberland Council	Revenues Team Leader	31st January 2023	31st December 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2103	Council Tax	Finance & Resources	Recommendation 5 – Consider if sample checks should be introduced to confirm robust eligibility criteria checks.	M	Increased risk of fraud and error.	Consideration to be made during 2022/23, which may assist LGR preparation for Cumberland Council	Revenues Team Leader	31st January 2023		Recommendation evidenced as actioned (Closed)
G2103	Council Tax	Finance & Resources	Recommendation 6 – Review if any improvements can be made to the overpayment recovery reports.	M	Overpayment recovery inefficiencies are not identified.	Review of reports to be made during 2022/23, to see if improvements can be identified.	Recovery Team Leader	30th November 2022		Recommendation evidenced as actioned (Closed)
J2104	Covid-19 Grants - Counter Fraud (Partial)	Finance & Resources	Recommendation 1 – Use the post-payment assurance process to demonstrate that eligibility criteria has been met; and that error and fraud has been minimised.	H	Payments made to ineligible or fraudulent claimants, or in error.	Eligibility and evidence for a sample of payments aligned to the review of likely incidence of fraud and error to be reviewed, with results documented / Independence and size of sample reviewed to be agreed with Corporate Director for Finance and Resources	Head of Revenues & Benefits Services / Revenues Team Leader / Head of Administration and Performance Management	30th Sept 2022	31st July 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
J2104	Covid-19 Grants - Counter Fraud (Partial)	Finance & Resources	Recommendation 2 – Review the likely incidence of fraud and error that may have occurred for all schemes and investigate findings as part of the post-payment assurance assessment.	H	Payments made to fraudulent claimants or made in error.	Review of likely incidence of fraud and error for all schemes to be conducted	Revenues Team Leader / Head of Administration and Performance Management	30th Sept 2022	31st July 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 2 – Guidance documents to be regularly reviewed and updated with consideration given to DWP good practice.	M	Content of key documents not current or align to DWP good practice guidance.	Documentation to be reviewed in accordance with DWP circulars and relevant good practice guidance	Revenues and Benefits Operations Manager	31st December 2021	31st July 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 4 – Staff training requirements to be regularly assessed with outcomes recorded.	M	Staff are not fully trained to carry out their role.	All staff training requirements to be captured and documented.	Revenues and Benefits Operations Manager	31st January 2022		Recommendation no longer relevant due to change in circumstances (Closed)
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 5 - Collection and Recovery Policy to be finalised and published.	M	Service priorities are unclear to staff.	Documentation to be reviewed and formally approved for publication.	Recovery Team Leader	31st December 2021		Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 6 – Update the current arrangements in place with the Authority's collection agent.	M	Level of service of Collection Agent is not formally agreed and falls below expectations.	Agreement to be reviewed with monitoring arrangements and information reviews to be re-instated.	Recovery Team Leader	30th September 2021		Recommendation evidenced as actioned (Closed)
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 8 - The Systems Support Team should apply the archiving tool provided to the Academy system to ensure historic records no longer required are deleted on a timely basis.	M	Authority may not be fully compliant with UK GDPR	Archiving processes to be commenced and appropriate records removed.	Systems Support and Control Manager	31st March 2022	30th November 2023	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2006	Housing Benefits (Reasonable)	Finance & Resources	Recommendation 11 – Clear recovery targets to be set for Overpayment Recovery staff in line with DWP good practice guidance.	M	Overpayment recovery is not efficient and effective	Target performance to be determined, based on previous years collection performance.	Recovery Team Leader	31st October 2021		Recommendation no longer relevant due to change in circumstances (Closed)
A2102	Environmental Strategy (Reasonable)	Community Services	Recommendation 7 - Set a timetable for completion of communication and engagement planning.	M	Loss of Council reputation and partner engagement.	Finalise communication and planning alongside a new action plan (Rec.1).	Policy and Communications Manager	01 January 2022	30.06.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.

Ass Code	Audit	Directorate	Recommendation	Priority	Risk Exposure	Agreed action	Responsible Manager	Original Completion Date	Revised Completion Date (if applicable)	Status
B2103	Recycling (Perf Info)	Neighbourhood Services	Recommendation 2: Guidance should be documented in relation to targets and the calculation methodologies used for each of the performance standards reviewed.	M	If procedures are not clearly documented, officers may be unsure of their roles and responsibilities and incorrect practices may occur that may lead to inaccurate information or reputational damage to the Council.	The existing guidance will be reviewed and updated to provide greater clarity on targets and the calculation methodologies used for each of the performance standards.	Policy & Communications Manager	30 September 2022	30.06.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
G2202	Financial Services Governance Arrangements	Finance & Resources	Review narrative for operational risk mitigating actions	M	Risks escalate because mitigating actions are ineffective	Risks will be reviewed at the next update of the Operational Risk Register	Head of Financial Services	31.03.23		Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
G2202	Financial Services Governance Arrangements	Finance & Resources	Verify that all required documents are disposed of in line with the Financial Procedure Rules and Data Protection Legislation	M	Service is not compliant with Financial Protection Rules or Data Protection Legislation	Disposal log will be updated and guidance given to the team on ensuring documents are disposed of in line with the guidance	Head of Financial Services	31.03.23		Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
G2104	MAS	Finance & Resources	Recommendation 3 – Reinstatement the monthly bank reconciliation supervisory review and authorisation	M	Bank reconciliation errors may not be identified in a timely manner	The monthly bank reconciliation review will be reinstated	Head of Financial Services	30 September 2022		Recommendation evidenced as actioned (Closed)
J2104	Procurement (Counter-Fraud)	Finance & Resources	Recommendation 3 – Training and/or information should be provided to budget holders to help maintain awareness of current procurement fraud issues	Medium	Responsible officers unaware of current developments and issues within risk environment	A process will be investigated to determine how best to disseminate information of current procurement fraud issues to service managers	Head of Financial Services	30 September 2022	30.09.23	Rec will not be implemented by Carlisle City Council. Move to schedule of recommendations to be considered during transition.
J2104	Procurement (Counter-Fraud)	Finance & Resources	Recommendation 4 – A process should be put in place to ensure the procurement fraud risk environment is closely monitored and consideration should be given to including management of this risk within the Council's operational risk registers	Medium	Limited awareness and failure to manage new and emerging risks	Inclusion of procurement fraud in the operational risk register for finance will be considered	Head of Financial Services	30 September 2022	30.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
G2205	Treasury Management	Finance & Resources	Recommendation 1 – Formal authorisation and confirmation to be recorded for all Treasury management Investments	M	Financial loss through fraud or error	A process will be put in place to ensure oversight of investments placed	Head of Financial Services	01.12.22		Recommendation evidenced as actioned (Closed)
A2201	Risk Management	Corporate Support	Recommendation 1 – Corporate Risk Management Group to formally review and agree the Corporate Risk Register on a continuing basis, in line with the Council's Financial Procedure Rules.	M	Risks to Corporate objectives escalate and management unable to make informed decisions on corrective action.	Regular meetings of the CRMG to be scheduled up until Vesting Day/ Corporate Risk owners to be e-mailed monthly che3kcin for any escalations/ identification of new corporate levelrisks. Special meeting of the CRMG can be called when required/ The City Council's current corporate risk register is part of discussions at an LGR Task & Finish Grop, this will ensure that the relevant risks migrate to the new Cumberland authority. It will also ensure examples of bes practice from across the districts	Chief Executive's Office Manager	November 2022/ November/ These meetings are taking place regularly as of October 2022		Recommendation evidenced as actioned (Closed)
A2201	Risk Management	Corporate Support	Recommendation 2 – Corporate Risk Management Group to formally review and agree the effectiveness of the Risk Management Sub-Group, on a continuing basis.	M	Risk Management Sub-Group is not operating effectively with reduced oversight of risks to operational objectives	RMSG minutes to be a standing item on the CRMG agenda/ The RMSG has agreed the need to continue to meet beyond Vesting day/ CRMG to have a discussion as to how best carry out the review and identify actions/ timescales	Chief Executive's Office Manager	November 2022		Recommendation evidenced as actioned (Closed)
A2201	Risk Management	Corporate Support	Recommendation 3 – Corporate Risk Management Group to formally review and agree the effectiveness of major project risk management arrangements on a continuing basis.	M	Risks to major Council projects escalate and management unable to make informed decisions on corrective action.	Project Managers to continue to be requested to identify escalating risks and flag these with the Chief Executive's Office to arrange necessary escalation routes/ A discussion to take place at CRMG around adding this to the role of that Group	Chief Executive's Office Manager	On-going	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)
A2201	Risk Management	Corporate Support	Recommendation 4 – Risk Management Sub-group to formally review and agree the effectiveness of operational risk management arrangements, on a continuing basis.	M	Risks to service objectives escalate and management unable to make informed decisions on corrective action.	This process is about to re-commence with the consideration of the HR operational risk register at the November meeting of the RMSG. At the end of the RSMG the next operational risk register for consideration will be identified and agreed and the penholder invited to attend the next meeting to present	Chief Executive's Office Manager	On-going	31.03.23	Recommendation not actioned - revised timescales for implementation agreed (or rec replaced)