

Findings Report

Outstanding Recommendations – implemented

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings
Service: Corporate Services- Human Resources Responsible Officer(s): HR/OD Manager	HR Leave Review 2018/19 A review of the electronic flexi spreadsheet should be undertaken to ensure that:- -Leave can be booked in hours for part-time workers -spreadsheet formulae is correct prior to its annual release on the staff intranet A review of the flexi-time scheme should be undertaken in relation to:- -lunch breaks requirement where officers work 6.5-7hrs	Medium	Mar-21	The flexi-sheet has been updated and is on the intranet. As part of the update, the minimum lunch break has been amended from 30 mins to 20 mins to reflect working time regulations. All part time workers that work 6hrs or more would be expected to take a 20 min lunch break..
Service: Corporate Services- Human Resources Responsible Officer(s): HR/OD Manager with counter fraud unit	Serious and Organised Crime Framework (HR) Audit 2018-19 Consideration should be given to the current level of pre-employment checks undertaken to review whether high risk roles require enhanced vetting checks. Appropriate checks might include: - Credit checks - Employment verification - Identity verification Any changes to procedures should then be documented within the relevant policy.	Low	Apr-20	Evidence was provided by the HR & OD Manager that demonstrated that the pre-employment check standards have been revised including what posts require enhanced vetting checks
Service: Corporate Services-	Serious and Organised Crime Framework (HR) Audit 2018-19	Medium	Apr-20	The 2021-22 PPD form requires all members of staff to declare that they have read the code of conduct.

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Human Resources Responsible Officer(s): HR/OD Manager	The Code of Conduct form should be amended to require staff to sign to demonstrate that they have read, understood and will comply with the Code. This should be issued to all staff and returned to HR once implemented			
Service: Corporate Services- Human Resources Responsible Officer(s): HR/OD Manager	Serious and Organised Crime Framework (HR) Audit 2018-19 The Council's Code of Conduct should be reviewed to ensure it remains appropriate. Consideration should be given to the management and monitoring of conflicts of interests, including: - conflicts such as staff having access to amending systems/ accounts of family and friends - process for linking declared interests to checks within the finance system e.g. raising creditors - employment of spouses where a conflict of interest may arise Once completed, the new form should be issued to all staff, signed and returned to HR.	Medium	Apr-20	The Council's code of conduct has been updated and includes a section on conflict of interest and when staff should notify management. The 21-22 PPD now requires staff to confirm that they have read the code of conduct and also understand their responsibility in relation to reporting conflicts of interest.
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Management Team	Complaints Audit 2019-20 The complaints policy should reflect that the report process is annual. Furthermore, the annual reporting against the policy should demonstrate that the lessons learnt have been implemented.	Medium	Jul-20	Updated complaints policy presented and approved at Executive Committee on 31/3/21. Lessons learnt to be reported to O&S committee. Assurance work on the accuracy and adequacy of the reported lessons learnt will be reviewed by Internal Audit as part of the audit plan.
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Management Team	Complaints Audit 2019-20 In respect of the new CRM system, the programme of works in relation to complaints should include: 1) End to end collection of complaint data including evidence of lessons learnt. 2) Access to closed complaints in order to review and add additional information. see comment above -	Low	Sep-20	Recommendation status: Implemented The new complaints system developed on the Liberty Create platform has taken account of the internal audit recommendations. es are closed unless the customer responses in full had been received. In respect of online forms verbal assurance was provided that as forms are now created the appropriate automatic response times in line with customer care standards are now being included.

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	<p>3) A new decision category to be set up in relation to complaints that cannot be finalised.</p> <p>4)All online forms should provide a response time to be agreed with managers (giving consideration to customer care standards and legislative requirements) prior to being included within the auto acknowledgements</p> <p>A review of online forms to be undertaken to identify auto acknowledgements that have no response time. Response times to be agreed with managers (giving consideration to customer care standards and legislative requirements) prior to being included within the auto acknowledgement.</p>			
<p>Service: Financial & Asset Management Services – Financial Services</p> <p>Responsible Officer(s): Financial Services Manager</p>	<p>Procurement Cards 2019-20</p> <p>A reminder should be sent to all procurement card holders, covering the following points:</p> <ul style="list-style-type: none"> - the requirement for statements to be supported by an invoice in all cases - pointers regarding the correct detail codes to be used - the requirement to have a separation of duties when authorising expenditure - notification that monthly statements will now be received via email - the timeliness of coding and authorising statements - Information should also be made available on the new staff intranet regarding corporate credit cards 	Medium	Feb-20	Verbal and documentary evidence provided which demonstrates that recommendation has been implemented. A new procurement card portal has also been developed by the Business Transformation Team using the Liberty Create platform which will streamline the current process.
<p>Service: Corporate Services- Corporate Services Team</p> <p>Responsible Officer(s): Corporate Management Team</p>	<p>Risk Management 2019-20</p> <p>The corporate risk register should include all risks to achieving corporate priorities, in line with the new council plan. Particularly in relation to the new priorities for 2020-2024 e.g. sustainable environment and delivery of the climate emergency action plan.</p>	Medium	Jul-20	The risk register has identified risks around new priority areas such as the garden town and climate change.
<p>Service: Corporate Services-</p>	<p>DHP Audit 2019-20</p>	High	Apr-20	A checklist has been developed which includes the DHP information as stated in the recommendation.

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings
Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager	REC1: A checklist should be developed to support the collection and assessment of DHP information, to include: 1) Obtaining 3 months of bank statements 2) using bank statements to verify amounts stated on the application form 3) obtaining tenancy agreements to confirm rent liability 4) Obtaining supporting evidence for reported health issues 5) obtaining information on claimants housing status 6) details of conditions applied to the award (for any renewed application confirmation that conditions have been met) 7) details of the exceptional circumstances where DHP is awarded in excess of 13 weeks 8) the provision of personal budgeting support either internally or through partners			
Service: Corporate Services- Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager	DHP Audit 2019-20 REC2: The inclusion of non-essential items should be considered as part of the scheduled review of the DHP policy.	Medium	Apr-20	The DHP policy has been reviewed to clarify non-essential items. The revised policy will be taken to Executive Committee in the New Year.
Service: Community Services- Environmental Services Responsible Officer(s): Head of Community Services	Bulky Waste Audit 2016-17 A review of the bulky waste service, including charges, should be carried out.	Medium	Feb-20	A full review of the bulky waste service has been completed with a new service provider in place, effective April 2021. The project has also introduced a new charging structure, introduced recycling, online bookings and reduced customer wait times.
Service: Community Services- Environmental Services	Bulky Waste Audit 2016-17 Terms of reference for using this service should be established and published.	Low	Feb-20	A review of the online request for bulky waste found that this information is now included within the pre-ordering information.

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings
Responsible Officer(s): Head of Community Services				
Service: Community Services- Emergency Planning Responsible Officer(s): Head of Community Services in conjunction with Civil Protection Officer	Emergency Planning Audit 2019-20 A training programme should be established for the emergency planning response team. This should include: - Identification of ongoing training requirements (including awareness training for elected members). - A schedule of test exercises to be carried out.	Medium	Sep-20	Evidence of a training programme was provided by the Civil Protection Officer (CPO). The programme includes awareness training and exercises the CPO explained that due to COVID training and exercises have had to be postponed. Wherever, possible virtual training has been provided. Further training and exercises are planned to take place by end of the current financial year.
Service: Community Services- Licensing Responsible Officer(s): Environmental Health Manager	Licensing Audit 2017-18 A review of the animal boarding application process should be undertaken.	Low	Oct-20	A review of animal boarding has been undertaken and reported to the Licensing Committee in February 2021.
Service: Community Services- Ubico Fleet Management Responsible Officer(s): Ubico Head of Fleet Management	Ubico Fleet Management Audit 2018-19 A stock management system should be developed in respect of parts ordered	Medium	May-20	The Ubico Head of Fleet Operations confirmed that a fleet Management Computer system had been introduced and incorporates a stock management system. This was demonstrated through the production of an inventory transaction report showing ordering and receipt of parts.
Service: Community Services-	Ubico Fleet Management Audit 2018-19	Medium	Mar-20	The Ubico Annual Report 20/21 notes that there were only 2 reportable RIDDOR incident in the year. Considered as low risk, verbal confirmation from the Ubico Head of Fleet Management stating that the

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings
Ubico Fleet Management Responsible Officer(s): Ubico Head of Fleet Management	The reporting of RIDDOR accidents to TBC should be undertaken within 24 hours of reporting the incident to the HSE.			reporting of RIDDORs is within the agreed time scale has been accepted as proof that the recommendation has been implemented.

Outstanding Recommendations – partially/not implemented with revised target dates

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Services Manager and SPOC in conjunction with Information Asset Owners	GDPR 2018/19 Audit Discussions should take place between Customer Services and relevant service areas to ensure there is a consistency in the information being retained. Following this, in conjunction with ICT, appropriate retention periods should be set within Firmstep for personal data obtained via online forms.	Medium	July 20	Recommendation status: <i>Partially Implemented</i> The previous digital platform (Firmstep) had limited retention functionality. The new platform (Liberty Create) allows retention periods to be established and this is part of the implementation. These need to be reflected within the corporate retention schedule.	Mar-23
Service: Corporate Services- Human Resources Responsible Officer(s): HR/OD Manager	HR Leave Review 2018/19 Guidelines in respect of the type of courses and levels of expenditure that could be supported through the training policy should be established. In addition, a schedule of costs should be included within the training agreement in order to identify the full cost of the training provision to be approved.	Medium	Mar-21	Recommendation status: <i>Partially Implemented</i> A wider review of training is being carried out to ensure that training is appropriate and can be supported by the training budget. A matrix of training is to be established which will categorise the type of training that is mandatory and essential to each job role.	Apr-22
Service: Corporate Services- Human Resources Responsible Officer(s):	Serious and Organised Crime Framework (HR) Audit 2018-19	Low	Apr-20	Recommendation status: <i>Not implemented</i>	Apr-22

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
HR/OD Manager	Consideration should be given to providing the HR team with training to identify fraudulent IDs and documentation			Training has been postponed as a result of the COVID pandemic.	
Service: Corporate Services- Human Resources Responsible Officer(s): HR/OD Manager in conjunction with CFU	Serious and Organised Crime Framework (HR) Audit 2018-19 An investigation should be completed into the availability of providing training to appropriate staff to identify indicators of officers working under duress or potential corruption.	Low	Apr-20	Recommendation status: <i>Partially Implemented</i> Remains partially implemented as the bribery and corruption work stream was delayed due to the pandemic. This work stream is has now been added to the CFU work plan.	Jul-22
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Services Manager	Project Management Framework Audit 2018-19 An annual review of service plans should be carried out in order to ensure all potential projects are identified and horizon forms should be completed in all cases	Low	Apr-20	Recommendation status: <i>Not Implemented</i> The Head of Corporate Services and the Corporate Services Manager will undertake an annual review of service plans.	Mar-22 New Responsible Officer: Head of Corporate Services in conjunction with Corporate Services Manager
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Services Manager	Project Management Framework Audit 2018-19 Training on the project management framework, including risk management, should be provided to all officers involved in project delivery.	Medium	Oct-20	Recommendation status: <i>Not Implemented</i> Earlier follow up established an annual update training on PMF was diarised for April 2020 and that risk management training would be provided at later stage of 2020. However, in view of the pandemic in 2020 these events did not take place. The Corporate Services Manager has indicated that the training is to be provided by March 2022.	April-22
Service: Corporate Services	Risk Management Audit 2019-20	Low	Dec-20	Recommendation status:	Dec-21

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
Responsible Officer(s): HEAD OF CORPORATE SERVICES	Risk Management' should be included as a standard agenda item for all team meetings to encourage discussion around existing and emerging operational risks.			Not Implemented The Head of Corporate Service confirmed that this would be implemented by the end of the current year.	
Service: Corporate Services & Financial Services and Asset Management Responsible Officer(s): HEAD OF CORPORATE SERVICES & HEAD OF FINANCIAL AND ASSET MANAGEMENT	New Income System Audit 2018-19 The Council should comply with the Payment Card Industry Data Security Standards and in this respect should give consideration to:- -the transaction process relating to phone payments, - payments taken at the reception desk -the physical environment in which card transactions are handled -Undertaking a PCI-DSS compliance certification - staff members taking payments when working from home	Medium	Jun-21	Recommendation status: Earlier Follow Up found Partially Implemented A project team has been established and a project initiation form will be brought forward shortly for consideration by Programme Board.	Apr-22
Service: Corporate Services Responsible Officer(s): Head of Corporate Services	Debtors-Service Related Recovery Audit 2019-20 A corporate collection procedure should be developed to cover: - Standardised recovery procedures, including period for issuing chasing letters and number of contacts attempted. - Requirement for services to retain ample supporting evidence to confirm that the invoice information is adequate and the retention period for this information e.g. for 6 years plus the current, or until the debt has been paid in full. - Responsibility and procedures of managers in relation to debt monitoring, including identification of debts incorrectly allocated and the procedure for handling these instances	Medium	Jul-20	Recommendation status: Not Implemented To be carried out by Internal Audit through corporate improvement days	Apr-22
Service:	DHP Audit 2019-2020	Medium	Apr-20	Recommendation status:	Apr-22

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
<p>Corporate Services-Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager</p>	<p>Consideration should be given to introducing performance reporting in respect of DHPs. This should be in consultation with the Lead Member for Finance and Asset Management.</p>			<p>Not Implemented</p> <p>The Revenues and Benefits Manager (RBM) confirmed that DHP performance data is currently not included in the member portfolio briefings. In addition, the collection of overpayments of DHP monies needs to be initiated prior to reporting on collection to the lead member. The progression of the implementation of this outstanding recommendation will be provided by RBM to Audit & Governance Committee in December 2021.</p>	
<p>Service: Corporate Services-Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager</p>	<p>DHP Audit 2019-2020</p> <p>An independent verification check should be carried out on a sample of DHP applications (10% of total applications received). This check should include a recalculation of the income and expenditure spreadsheet used by the assessors.</p>	High	June-20	<p>Recommendation status:</p> <p>Not implemented</p> <p>A sample of claims were reviewed and found that no independent verification had been completed. This is critical to ensuring the adequacy of the checking process in particular ensuring bank statements are fully challenged in relation to claimants holding other bank accounts such as 'paypal'; and that DHP conditions are being set. The progression of the implementation of this outstanding recommendation will be provided by RBM to Audit & Governance Committee in December 2021.</p>	Apr-22
<p>Service: Corporate Services-Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager</p>	<p>Council Tax Liability, Discounts & Exemptions Audit 2018-19</p> <p>A review of disregards should be undertaken</p>	Low	Jan-20	<p>Recommendation status:</p> <p>Not implemented</p> <p>The Revenues and Benefits Manager (RBM) confirmed that the review of disregards had been affected by the pandemic. A disabled band reduction review had taken place. However, RBM agreed that a rolling programme of review for disregards should be in place. A fresh programme would be established and implemented by Jun-22.</p>	Jun-22
<p>Service: Financial & Asset Management Services –</p>	<p>Risk Management Audit 2019-20</p>	Medium	Oct-20	<p>Recommendation status:</p> <p>Not Implemented</p>	Mar-22

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
Counter Fraud Unit Responsible Officer(s): Head of Counter Fraud	An operational fraud risk register should be developed; to include consideration of risks in relation to serious and organised crime.			The Counter Fraud Unit Manager explained that a work stream had been agreed for 2021/22 to implement a service specific fraud register and this will include a section relating to those risks associated with serious and organised crime	
Service: Financial & Asset Management Services – Financial Services Responsible Officer(s): Financial Services Manager	Procurement Cards 2019-20 1. Historical data held in relation to procurement cards on the financial services drive should be reviewed and destroyed in line with the council's retention schedule. 2. A privacy notice should be published in relation to the sharing of employee's personal data with Barclays for the purpose of issuing a procurement card.	Medium	Feb-20	Recommendation Status: <i>Partially implemented.</i> Evidence was obtained demonstrating that procurement cards data is being deleted in a timely manner. In addition a corporate credit card privacy notice has been drafted, which now requires some minor additional information relating to stating the legal basis for the retention of this data prior to it being published.	Apr-22
Service: Development Services Responsible Officer(s): Head of Development Services	Community Infrastructure Levy (CIL) Audit 2018-19 Governance of CIL administration and spending of CIL income should be agreed as a matter of urgency.	High	Sep-20	Recommendation status: <i>Partially Implemented</i> It was demonstrated that an informal collective approach is currently being undertaken in relation to the pooling of CIL monies. This approach includes the publishing of separate Infrastructure Funding Statements by the authorities where the statements are identical in relation to the projects that will be funded by CIL monies. The Head of Development Services confirmed that a partnership board is to be established in relation to CIL and future pooling and this is due to be in place by Mar-23. Recommendation rating change: Medium	Mar-23
Service: Community Services- Environmental Services Responsible Officer(s):	Commercial Waste Audit 2015-16 Undertake a review of the discretionary trade waste service to ensure it is operating on a viable commercial level.	High	Jan-20	Recommendation status: <i>Partially Implemented</i> A review of the current service is underway and progress reported at Overview and Scrutiny Committee. The	Apr-23

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
Head of Community Services				<p>Council has appointed a new waste contracts manager and also a project officer responsible for Trade Waste.</p> <p>New Responsible Officers:</p> <p>Waste Contracts Manager Principle Trade Waste Projects Officer</p>	
<p>Service: Community Services-</p> <p>Responsible Officer(s): Head of Community Services</p>	<p>Debtor Services Related Recovery Audit 2019-20</p> <p>Rec 1:Review the process for administration of the commercial waste service to ensure that the processing of customer information is accurate. At a minimum, training should be provided to the Operations Admin at Ubico, to ensure that the correct information is provided to enable the council to issue accurate invoices</p> <p><u>Commercial Waste Audit 2015-16</u></p> <p>Rec 1:Commercial waste debt should be regularly reviewed and appropriate recovery action taken.</p>	Medium	Sep-20	<p>Recommendation status:</p> <p><i>Not implemented</i></p> <p>This will be picked up as part of the project.</p> <p>New Responsible Officers:</p> <p>Waste Contracts Manager Principle Trade Waste Projects Officer</p>	Apr-23
<p>Service: Community Services-</p> <p>Responsible Officer(s): Head of Community Services</p>	<p>Debtor Services Related Recovery Audit 2019-20</p> <p>A grounds maintenance charging schedule should be developed to ensure that the council applies charges consistently. Agreements between the council and customers should be established based upon the charging schedule and actual service provided.</p>	Medium	Sep-20	<p>Recommendation status:</p> <p><i>Partially Implemented</i></p> <p>The Environmental Services Officer explained that a charging methodology has been established, which involves using the industry pricing standards to charge customers. There are 3 rates – 2p, 4p and 8p per square meter. The appropriate pricing standard will be encapsulated in a formal customer agreement. Square meterage will be identified through Uniform.</p> <p>New Responsible Officer:</p> <p>Environmental Services Officer – grounds maintenance</p>	Jul-22
<p>Service: Community Services-</p>	<p>Emergency Planning Audit 2019-20</p>	Medium	Jan-20	<p>Recommendation status:</p> <p><i>Partially Implemented</i></p>	Apr-22

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
Responsible Officer(s): Head of Community Services in conjunction with Head of Corporate Services and Out of House Officers	Documentation relating to the council's emergency planning arrangements should be reviewed as follows: <ul style="list-style-type: none"> - The emergency co-ordination room set-up procedure should be documented - Resilience Direct should be reviewed to ensure all documents are up to date e.g. all rest centre plans should be uploaded and out of date documents removed - The RAG status should be reviewed to include a risk matrix and each team leader should provide commentary on the status of their team prior to each Emergency Planning Team Leader meeting - The emergency plan should be published on the intranet (excluding personal contact details) - The link to the community risk register on the Gloucestershire Prepared webpage should be updated 			<p>The Head of Community Services verbally confirmed that documentation concerning emergency planning arrangements have been written but do need to be revised. The DEPLO confirmed that status commentary is now requested from Team Leaders prior to planning meetings. In addition, a risk matrix is no longer required as the scoring on the RAG is purely used to indicate the level of importance associated with the actions needed within the plan.</p> <p>The further actions in relation to the recommendation including</p> <ul style="list-style-type: none"> -publication of emergency plan -link to community risk register -updating of emergency documentation <p>will be included within the emergency 21-22 work plan.</p>	
Service: Community Services- Responsible Officer(s): Head of Community Services in conjunction with HR Services	Emergency Planning Audit 2019-20 A discussion should take place to establish where it is appropriate for job descriptions to include emergency planning operations. Where this is not considered to be appropriate, consideration should be given to developing a guidance document for volunteers in order to ensure roles and responsibilities are defined, to set expectations and ensure consistency across the authority	Medium	Feb-20	Recommendation status: <i>Not Implemented</i> The HR & OD Manager confirmed that no discussion had taken place. The recommendation therefore remains outstanding. A fresh implementation date was agreed with the HR & OD Manager of Jul-22	Jul-22
Service: Community Services- Licensing Responsible Officer(s): Environmental Health Manager	Licensing Audit 2017-18 A risk assessment of licensed premises should be carried out in accordance with the council's statement of licensing.	Medium	Oct-20	Recommendation status: <i>Not Implemented</i> The Head of Community Services and Environmental Health Manager indicated that a full review of all licensing processes is underway and likely to deliver improvements in the next 12 months. A risk assessment of all licence premises will follow this review.	Mar-23

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
<p>Service: Community Services-Licensing Responsible Officer(s): Environmental Health Manager</p>	<p>Licensing Audit 2017-18</p> <p>A review should be undertaken in respect of license processes regulated by the Licensing Act 2003.</p>	Medium	Apr-20	<p>Recommendation status:</p> <p><i>Partially Implemented</i></p> <p>Earlier follow up found that this recommendation was partially implemented as licence processes had been reviewed i.e. application references are now recorded within the general ledger and the conviction declaration form required for personal licences now lists all convictions that must be declared. <u>An action remains outstanding in respect of Temporary Event notices whereby the website information requires updating.</u></p> <p>The Head of Community Services and Environmental Health Manager indicated that a full review of all licensing processes is underway and likely to deliver improvements in the next 12 months</p>	Sep-22
<p>Service: Community Services-Licensing Responsible Officer(s): EH Manager/SLO</p>	<p>SOCF-Licensing Audit 2019-20</p> <ol style="list-style-type: none"> 1. The fields within the licensing module of Uniform need to demonstrate that the driver safeguarding test has been completed; 2. A regular sample check of Hackney/Private Hire (both driver and vehicle) and also operator licences should be undertaken to ensure that all information has been accurately recorded into Uniform; that all documentation requested within the application forms have been imaged and linked to the licence; and where a licence has been refused sub-licensing committee dates have been included within Uniform. 3. Complaints within the service request module of Uniform should be linked to the licensing module. In relation to proactive enforcement, any spot checks should also be recorded against the licence record 4. The licensing module within Uniform should demonstrate that two officers are involved in the 	Medium	Jan-20	<p>Recommendation status:</p> <p><i>Not Implemented</i></p> <p>The Head of Community Service and Environmental Health Manager explained that taxi/private hire policy is currently under review and that these recommendation actions will be considered under the licence process review (which is underway) over the next 12 months.</p>	Sep-22

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Findings	New implementation date
	validation/authorisation of a driver, operator and vehicle licences.				
Service: Community Services-Environmental Services Responsible Officer(s): Head of Community Services	Ubico Client Monitoring Audit 2019-20 A review should be undertaken to ensure performance indicators are in place for all elements of the service and that these include measurable targets i.e. timeliness of service delivery. Service areas to include: - Grounds Maintenance - Trade Waste - Bring sites The review should take into consideration the systems in place to collate the required data and the reporting functionalities available when agreeing any new KPI's.	Medium	Apr-20	Recommendation status: Not Implemented This recommendation remains outstanding. The establishment of PI's in relation to trade waste will form part of the commercial waste review that is expected to be completed by April 2023. The development of PI's concerning grounds maintenance and bring sites will be reviewed at the same time New Responsible Officer Waste Contracts Manager	Apr-23
Service: Community Services-Environmental Services Responsible Officer(s): Head of Community Services	Ubico Client Monitoring Audit 2019-20 The following variations to the Ubico contract should be formally agreed: - Receipt of a final reconciliation invoice at year end as opposed to quarterly. - Introduction of budget review meetings.	Low	Jan-20	Recommendation status: Not implemented The Head of Community Services explained that the Ubico contract is to be extended for a further 5 years from 1 April 2022 and therefore the variations to this contract will be undertaken prior to this date.	Apr-22
Service: Community Services-Ubico Responsible Officer(s): Head of Community Services	Ubico Health and Safety Monitoring Audit 2018-19 Copies of all health and safety reports should be requested to obtain assurance that any recommendations have been implemented.	Low3	Jul-20	Recommendation status: Not Implemented The Head of Community Services confirmed that this has not been progressed . New Responsible Officer: Waste Contracts Manager	Apr-22
Service: Community Services-Ubico Responsible Officer(s):	Ubico Health and Safety Monitoring Audit 2018-19 Evidence of the resolutions to risks identified within the service risk register should be requested and target dates agreed in respect of their completion.	Low	Mar-20	Recommendation status: Not Implemented	Apr-22

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Head of Community Services				The Head of Community Services confirmed that this has not been progressed . New Responsible Officer: Waste Contracts Manager	
Service: Community Services-Ubico Responsible Officer(s): Head of Community Services	Ubico Health and Safety Monitoring Audit 2018-19 An overview of all completed risk assessments and safe systems of work against each operational activity should be requested from Ubico, this should include review dates in order for effective monitoring to take place	Medium	Mar-20	Recommendation status: Not Implemented The Head of Community Services confirmed that this has not been progressed . New Responsible Officer: Waste Contracts Manager	Apr-22
Service: Community Services-Ubico Responsible Officer(s): Head of Community Services	Ubico Health and Safety Monitoring Audit 2018-19 In accordance with the contract, Ubico should be instructed to undertake regular health and safety checks on bring sites that are open to the public and details of these checks be provided to monitoring officers	Medium	Mar-20	Recommendation status: Earlier follow up found that this recommendation was partially implemented. Earlier follow up noted that Ubico have been instructed to undertake health and safety checks at the bring sites and details of these were to be included in future monitoring reports. The Head of Community Services confirmed that this has not been further progressed . New Responsible Officer: Waste Contracts Manager	Apr-22

Outstanding Recommendations – to be removed as a result of the recommendation review

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Conclusion
Service:	GDPR 2019/20 Audit	Medium	July 20	Recommendation status:

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Conclusion
<p>Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Services Manager and SPOC in conjunction with Information Asset Owners</p>	<p>A.The information group should establish a new action plan to include the following:-</p> <ol style="list-style-type: none"> 1) Outstanding recommendations from previous plans. 2) Review of the service risk assessment to ensure outstanding recommendations have been completed including a review of privacy statements 3) The list of processing held by the SIRO should be reviewed using the ICO template. 4) Review of individual services to ensure that: data sharing and processing agreements are up to date. 5) Establishment of a corporate training plan 6) Establishment of a scoring matrix for data breaches and the inclusion of the revised data protection security policy and breach form on the intranet. <p>-----</p> <p>B.Governance arrangements should be enhanced to include the following:-</p> <ol style="list-style-type: none"> 1) Regular reporting of breaches and data subject access requests to the Information Group. 2) The establishment of an organisational chart relating to data protection including identification of all IAOs. 3) The establishment of an IAO group email to ensure all data is captured in the subject access request process. 4) Job descriptions for officers in IAO roles to be updated to reflect their data protection responsibilities. <p>-----</p> <p>C.Service areas should be prioritised based on an assessment of current data retention risks - such as incompleteness of the service retention schedule; regularity of data deletion; adequate file structure in drives to aid deletion and the type of information held. The</p>			<p>Mitigated</p> <p>Evidence was supplied by the SPOC which demonstrate that the recommendations made in the audit have been incorporated within the Information Governance Board's current action plan. Monitoring of the completion of this plan will be undertaken through the Board. Further assurance of the implementation of these recommendations will be carried out through the ongoing work of IA as GDPR controls are now incorporated within all appropriate assigned audits.</p>

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Conclusion
	completion of this work should be included on the action plan monitored through the information group.			
Service: Corporate Services- Corporate Services Team Responsible Officer(s): Corporate Services Manager and SPOC in conjunction with Information Asset Owners	Sundry Debtor 2019/20 audit The online privacy notices should be updated to include reference to the use of information for debt recovery/raising of invoices.	Medium	July 20	Recommendation status: Mitigated Evidence was supplied by the SPOC which demonstrate that the recommendations made in the audit have been incorporated within the Information Governance Board's current action plan. Monitoring of the completion of this plan will be undertaken through the Board. Further assurance of the implementation of these recommendations will be carried out through the ongoing work of IA as GDPR controls are now incorporated within all appropriate assigned audits.
Service: Community Services- Environmental Health Responsible Officer(s): Head of Community Services in collaboration with JWT	Recycling 2016/17 audit Further consideration should be given to establishing a recycling data protocol between the JWT, UBICO and TBC to identify expected audit and contract performance monitoring exercises and escalation procedures in the possible event of non-payment of recycling credits.	Low	Dec-19	Recommendation status: Mitigated Previous follow ups had identified that a data protocol had been drafted. However, the JWT work with the council has now ceased and therefore the protocol is no longer required.
Service: Corporate Services- Revenues & Benefits Responsible Officer(s): Revenues & Benefits Manager	Housing Benefits – DHP 2017-18 In line with the scheduled review of the Council's DHP policy, consideration should be given to the recovery of overpayments, monitoring functions and the establishment of contingency funds	Low	Apr-20	Recommendation status: Mitigated This recommendation will be reviewed through the follow up of the DHP 2019/20 audit recommendations as elements of this recommendation are included within recommendation 3 of the 19/20 audit.
Service: Financial Services & Asset Management-	Financial e-ordering 2018-19 A proactive approach should be taken to identify instances where purchase orders have been raised after the receipt	Medium	Feb-20	Recommendation status: Mitigated

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Conclusion
Financial Services Responsible Officer(s): Finance Manager	of invoice. Outcomes should be escalated to management where appropriate.			Previous follow ups identified that quarterly reports were being produced identifying instances where purchase orders had been raised after receipt of invoice.
Service: Financial Services & Asset Management- Financial Services Responsible Officer(s): Finance Manager	Financial e-ordering 2018-19 In order to comply with the 'pay creditors' privacy statement, all creditors to whom a payment has not been made 1 year after the last payment date should be identified and associated bank details be redacted and deleted. This should be carried out on an annual basis.	Medium	Feb-20	Recommendation status: <i>Mitigated</i> It has been identified that creditors bank details need to be retained for 7 years for HMRC purpose and therefore cannot be deleted after 1 year. The 'pay creditors' privacy statement has been amended to reflect this position.
Service: Corporate Services- ICT Responsible Officer(s): ICT Manager	ICT PSN Submission & ICT Environmental Controls 2016-17 Key ICT policies and procedures should be reviewed and where appropriate updated. This should include appropriate reference to all physical and environmental information security risks.	Low	Apr-20	Recommendation status: <i>Mitigated</i> The ICT Gap Analysis Report recently reviewed ICT policies and recommended a list of required policies that needed to be amended or introduced in order to meet ISO standards. The ICT PSN/Environmental Controls recommendation has therefore been superseded by the requirements of the GAP Analysis recommendation.
Service: Community Services Responsible Officer(s): Ubico Head of Fleet Management	Ubico Fleet Management Audit 2018-19 When TBC vehicles are used by other partners/parties, the council should be notified promptly. The partner should be charged a hire fee in line with the agreed daily rate, set by the Head of Community Services. Quarterly reports should be provided to the Council detailing the usage and income received.	Medium	Jan-20	Recommendation status: <i>Mitigated</i> The Ubico Head of Fleet Management confirmed that vehicles are no longer shared between partners and therefore this recommendation has been mitigated.
Service: Community Services- Ubico Fleet Management Responsible Officer(s): Ubico Head of Fleet Management	Ubico Fleet Management Audit 2018-19 Repair data should identify any trends in causes for repairs, particularly driver error in order to identify any training issues.	Low	May-20	Recommendation status: <i>Mitigated</i> This recommendation was made in relation to identifying trends in repairs which could be linked to specific causes such as 'access issues'; poor driving etc. A reporting suite is available within the fleet management computer system that can be used to identify areas of driver improvement. However, the current main method of identifying trends is through the review of vehicle accidents. The Ubico monthly reports now provide information in relation to accident causes such as 'access issues'. The 20/21 Ubico annual report

Service and Responsible Officer(s)	Audit & Recommendation:	Rec. Rating	Expected Implementation date:	Conclusion
				further explains that trends are linked to employee monthly debriefs in order to reduce the future occurrences.
Service: Community Services- Ubico Fleet Management Responsible Officer(s): Ubico Head of Fleet Management	Ubico Fleet Management Audit 2018-19 In compliance with the hire agreement clause D1, the format of the annual service report should be agreed between the council and UBICO representatives. This should be compiled for the current financial year and provided to the council promptly after year end. The annual report should be supported by quarterly updates provided to the ESPB. - additional action: repair and tyre data including costs to be reported quarterly to ESPB.	Low	May-20	Recommendation status: Mitigated The recommendation has been mitigated through the production of a fleet compliance audit score and the inclusion of detailed financial costs in relation to tyres and repairs within the Ubico budget reports. In addition, the Ubico Head of Fleet Management stated that the fleet management computer system produces reports on tyres and these are to be included in the monthly Ubico report to TBC.