Cheltenham Borough Council

Report of Internal Audit Activity

January 2021

Internal Audit ▪ Risk ▪ Special Investigations ▪ Consultancy

Unrestricted

Contents

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- Appendices:

SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors, further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note.

At the conclusion of audit assignment work each review is awarded a "Control Assurance Definition";

- **No**
- **Limited**
- **Reasonable**
- **Substantial**

● Audit Framework Definitions

Control Assurance Definitions

No	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.
Limited	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
Reasonable	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Substantial	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Non-Opinion – In addition to our opinion based work we will provide consultancy services. The "advice" offered by Internal Audit in its consultancy role may include risk analysis and evaluation, developing potential solutions to problems and providing controls assurance. Consultancy services from Internal Audit offer management the added benefit of being delivered by people with a good understanding of the overall risk, control and governance concerns and priorities of the organisation.

Recommendations are prioritised from 1 to 3 on how important they are to the service/area audited. These are not necessarily how important they are to the organisation at a corporate level.

Each audit covers key risks. For each audit a risk assessment is undertaken whereby with management risks for the review are assessed at the Corporate inherent level (the risk of exposure with no controls in place) and then once the audit is complete the Auditors assessment of the risk exposure at Corporate level after the control environment has been tested. All assessments are made against the risk appetite agreed by the SWAP Management Board.

● **Audit Framework Definitions**

Categorisation of Recommendations

When making recommendations to Management it is important that they know how important the recommendation is to their service. There should be a clear distinction between how we evaluate the risks identified for the service but scored at a corporate level and the priority assigned to the recommendation. No timeframes have been applied to each Priority as implementation will depend on several factors; however, the definitions imply the importance.

Categorisation of Recommendations	
Priority 1	Findings that are fundamental to the integrity of the service's business processes and require the immediate attention of management.
Priority 2	Important findings that need to be resolved by management
Priority 3	Finding that requires attention.

Definitions of Risk

Risk	Reporting Implications
High	Issues that we consider need to be brought to the attention of both senior management and the Audit Committee.
Medium	Issues which should be addressed by management in their areas of responsibility.
Low	Issues of a minor nature or best practice where some improvement can be made.

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2019/20 Audits in Draft / In Progress at Annual Opinion									
Key Financial Control	Accounts Receivable		Final Report	Reasonable	4		1	3	Reported in November
Follow-Up	Procurement		Final Report	N/A	-				Reported in November
Follow-Up	Procurement and Contract Management		Final Report	N/A	-				Reported in November
Advisory	Planning Process and Complaints Procedure		Final Report	Advisory	2		2		Reported in November
ICT	Business Continuity		Draft Report						
ICT	Incident Management		Final Report	Reasonable	4		2	2	See Appendix C

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2020/21 Audit Plan									
Operational	Business Grant Funding		Complete	N/A	-				Support to the Council in respect of Data Input
Operational	Vulnerable and Shielding Residents		Complete	N/A	-				Data analysis conducted on support given by the Council to registered residents during the pandemic
Operational	Managers Assurance Statement		Complete	N/A	-				Co-ordination of Managers Assurance Statements
Advisory	CFU Policies		Complete	N/A	-				Reviewing policies held by CFU and advising of changes to legislation
Operational	Continuous Assurance Reports		On-Going						Accounts Payable, Accounts Receivable, Payroll
Key Financial Control	Revenues and Benefits								
	• Council Tax and National Non-Domestic Rates		Draft Report						
	• Housing and Council Tax Benefits		Draft Report						
Key Financial Control	Core Financials								
	• Accounts Payable		In Progress						
	• Accounts Receivable								
	• Main Accounting		In Progress						

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
	• Payroll		In Progress						
	• Treasury Management and Bank Reconciliation		Final Report	Substantial	1			1	See Appendix C
Key Financial Control	Systems Administration		In Progress						
Key Financial Control	Human Resources								
Key Financial Control	Other Support Service provided by Publica • Health and Safety (Of Staff)		Position Statement	N/A					See Appendix C
ICT	Cyber Security		Final Report	N/A	5			5	See Appendix C
ICT	Use of Anti-Malware Software		ToE Drafted						
ICT	Automatic Back-Up of System Data								
Governance	Risk Management								
Governance	Performance Management								
Governance	Governance of Programmes and Projects								
Governance	Governance Arrangements for Cyber Cheltenham		In Progress						
Operational	Asset Management and Commercial / Investment Property		Final Report	Substantial	2		1	1	See Appendix C
Operational	Planning Applications		In Progress						

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Operational	Planning Enforcement		In Progress						
Operational	Post Payment Assurance – Small Business Grants								
Operational	Authority's Response to Covid-19								
Operational	Publica Transformation Benefits Realisation								
Operational	The Delivery of Services by Publica								
Operational	Inclusivity and Diversity								
Operational	Training Courses		Draft Position Statement						
Operational	Publica Support Costs Recharge Process & Internal Control Process for Contract Variations (NEW)		ToE Agreed						
Follow-Up	Follow-Ups of Recommendations made in Substantial and Reasonable Audits		On Going						
Follow-Up	Follow-Up of Control Weaknesses identified by the Counter Fraud Unit								
Follow-Up	Procurement								Further Follow-Up required

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Follow-Up	Procurement and Contract Management								Further Follow-Up required
Grant Certification	Disabled Facilities Grants		Complete	N/A					
Grant Certification	Income Compensation Scheme (NEW)								
Other Audit Involvement	Working with the Counter Fraud Unit		On Going						
Other Audit Involvement	Management of the IA Function and Client Support		On Going						
Other Audit Involvement	Contingency – Provision for New Work based on emerging risks								

The following information provides a brief summary of each audit review finalised since the last Committee update

ICT Incident Management – Final Report – December 2020

Audit Objective	The objective of the audit is to ensure that technical solutions are managed and deployed to protect data and systems from malicious attack.

Assurance Opinion

There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.

Number of Actions

Priority 1	0
Priority 2	2
Priority 3	2
Total	**4**

Risks Reviewed

Operation of the network or information systems is disrupted. Information and data are intercepted and disclosed or stolen.

Assessment

Medium

Key Findings

As part of the Information Security framework of policies, the Incident Management Policy is out of date and requires review, update, and approval. Update of the policies has been impacted by the Covid-19 pandemic, and the need for a review is recognised by the ICT Audit & Compliance Manager.

There is a lack of detailed standard operating procedural documentation. Incident management investigation is currently based on a high-level process flow-chart denoted in the Incident Management policy; however, this lacks detailed information on how to conduct an incident investigation.

At the initial stages of the audit there was a limited Incident Response plan. It is best practice to develop risk-based scenarios within response plans and regularly test them to prepare for an incident. A detailed plan noting scenarios and action plans is being developed and good progress has been made.

Weekly vulnerability scans are performed, and prioritised vulnerabilities where remedial action is to be taken are actioned using the helpdesk ticketing system. A similar process could be used to track all vulnerabilities detected in the weekly scans as is used for the annual penetration test findings.

Appropriate technology is in place and used to enable the Cyber Security Engineer and wider ICT team to detect, mitigate and respond to security incidents. The Cyber Security Engineer practices continual education and development to keep abreast of current technology, threats, and risks.

Audit Scope

The audit scope was a review and assessment of the policies, plans and processes in place and used together with technology used to detect, prevent, and respond to security incidents or events.

The review also covered the following areas;
- Threat detection and protection
- Vulnerability assessment and remediation

The review was undertaken by interviewing key personnel including the Cyber Security Engineer and the ICT Audit and Compliance Manager, together with the review of documentation and evidence provided.

Next Steps

It is widely recognised that for any organisation, a significant security incident or breach is a matter of 'when', not 'if'. Organisations are increasingly reliant on IT services, therefore, it is critical that an organisation is prepared, as much as possible, for a significant incident that will disrupt ICT service provision.

Actions have been agreed with management, with a detailed action plan attached as Appendix 1, to improve incident management preparedness. All actions are due to be implemented by April 2021 or are ongoing exercises. A summary of the key findings from our review will be presented to the Audit Committees and Publica Board.
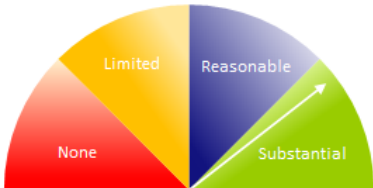
Asset Management – Final Report – December 2020

Audit Objective

The objective of the audit is to ensure the Council's activities for its property and land assets are co-ordinated to realise value (maximise income or release capital) whilst supporting its strategic objectives.

Assurance Opinion

A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Number of Actions

Priority	Number
Priority 1	0
Priority 2	1
Priority 3	1
Total	2

Risks Reviewed

	Assessment
Not all commercial rents, leases and service charges are identified and collected.	Medium
Asset Management Plan (AMP) and core strategies are not aligned in order to achieve Council priorities.	Low
Assets are not reviewed to ensure optimum viability and usage.	Low

Key Findings

Reconciliation between the Uniform system and the Council's finance system is not completed as required by Financial Rules. If reconciliation is not completed regularly there is a risk that inaccuracies are not identified and corrected.

Testing of leases identified discrepancies with key information recorded within the Uniform system.

The Asset Management Plan demonstrates strong links with the Medium-Term Financial Strategy and core CBC strategies. The rolling program of review and valuation ensures assets are revalued at least once every 5 years. The COVID-19 response included a Risk and Opportunity Asset Review.

Audit Scope

Areas reviewed during the period April 2019 – September 2020 are as follows:

- Asset management strategy.
- Capital programme.
- Strategic review of assets.
- Review and valuation process.
- Income process.

Observations and Next Steps

Observation: The Head of Property and Asset Management advised that the AMP is currently being reviewed and updated to ensure it continues to reflect the Councils corporate strategies and priorities whilst also supporting alignment with their COVID-19 Recovery Budget.

Next Steps: Two actions have been agreed with management, with a detailed action plan attached as Appendix 1. All actions are due to be implemented by 31st May 2021. A summary of the key findings from our review will be presented to the Audit, Compliance and Governance Committee.

Full details of our audit testing/ working papers are available upon request. Our audit assurance framework and definitions can be found here (www.swapaudit.co.uk/aboutus)

Health & Safety of Staff – Position Statement – December 2020

Audit Objective	To review and assess Health and Safety arrangements in place for staff, relating to hazardous materials and accompanying Personal Protective Equipment.

Executive Summary and conclusion

A Health & Safety of Staff review was included in the 2020/21 Annual Internal Audit Plan. The focus of the audit was planned to be on site visits and use of Personal Protection Equipment (PPE) in relation to hazardous substances. Initial meetings were held with the Health and Safety Business Partner (H&S BP) for Cheltenham Borough Council to discuss the scope of the audit.

The initial focus of the audit was set prior to COVID-19, where it would have been possible to carry out testing with officers and service areas in person, allowing us to review and provide assurance on practical control arrangements in place which would be most appropriate based on the audit focus. Following initial meetings with H&S BP, we have agreed that due to the remote working arrangements currently in place, it would provide limited value in carrying out the audit at this time.

Based on discussions with the H&S BP, we have no immediate concerns in this area. We have also agreed with the H&S BP that internal audit will accompany them in a sample of their planned future Health and Safety audits relating to the Control of Substances Hazardous to Health (COSHH) and PPE to provide oversight.

We have issued this Position Statement which provides information on where the service is at this current time.

- The Cheltenham Borough Council audit schedule is on rolling 3-year basis, and the H&S BP aims to recommence audits in January 2021.
- H&S reviews were carried out in 2019, with a focus on high-risk areas. The H&S BP has advised that she is confident that all arrangements in place are satisfactory and has not raised any concerns.
- CBC has a Health and Safety Working Group.
- Risk Assessments across the Council have been reviewed and updated in response to COVID-19. Oversight of these has been provided at CBC by the H&S BP and the Health and Safety Working Group.

Cyber Security Follow Up Report - October 2020

Audit Objective	To follow up on the 2018/19 recommendations and consider areas for further review in 2020/21.

Executive Summary and conclusion

During 2018/19 a Cyber Security audit was undertaken by SWAP's ICT audit team for Publica and the Partner Councils. The audit was based on a framework of 20 Key Cyber Security controls which covered 32 areas ranging from policy to technology. The audit was a 'high level' audit and testing was undertaken between April and July 2019 to determine whether:

- The control was fully compliant
- Management needed to take action
- Further audit testing (in an area) was to be planned

Due to the ever-changing nature of ICT, we included a subsequent review in the revised 2020/21 Internal Audit Plan. Supported by Publica's ICT Audit and Compliance Manager, we have followed-up the recommendations made in the 2018/19 audit and planned the audits which were identified as warranting a more in-depth audit.

Fully Compliant Areas
The original audit confirmed that the following areas were compliant, therefore no recommendations were made, and no further audit was required:

Control	Area
Inventory of Software Assets (Including Data Assets)	Data Asset Inventory
Control of Accounts with Administrative Privileges	Management of Default passwords for high privileged accounts
Active Monitoring and Analysis of Audit Logs	Audit Logging and Retention Policy
E-mail and Web Browser protections	Use of Network Based URL Filters / Blocking of Uncategorised Websites
Control of Network Ports, Protocols and Services	Documentation and authorisation routines for ports, Protocols and Services
Secure Configuration of Network Devices	Build standards and management process for network devices
Boundary Defences are documented and understood	Management of connections across trusted network boundaries
Programme of Penetration testing	Conducting and following up on penetration testing

Recommendations Made
Thirteen recommendations were made in the 2018/19 audit. This review has found that:

- Seven recommendations have been actioned
- One recommendation is an on-going piece of work and will remain live
- The progress on four recommendations has been affected by Covid-19. The implementation date for these recommendations was June / September 2020. We have agreed with the ICT Audit and Compliance Manager to defer the implementation dates to allow for the recommendation to be actioned. We will follow these up when the target date has been met.
- A recommendation that was made in respect of Asset Lifecycle Management will be planned to be included in the 2021/22 Audit Plan within the Technology Asset Inventory Audit.

Further Audit
An outcome of the audit undertaken in 2018/19 was to enable us to plan the ICT audits going forward, there are areas that we have reviewed at a high level but warrant further audit testing to gain full assurance over the management of risk. IA and the ICT Audit and Compliance Manager have assessed these areas based on the level of risk to Publica and the partner Councils.

Full details of our audit testing/ working papers are available upon request. Our audit assurance framework and definitions can be found here (www.swapaudit.co.uk/aboutus)
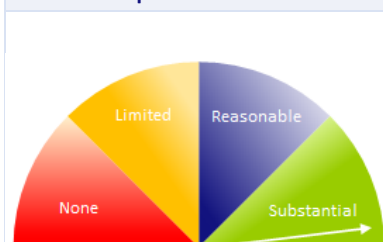
Treasury Management and Bank Reconciliation – Final Report – January 2021

Audit Objective	To ensure that the key controls within Treasury Management and Bank Reconciliations are operating effectively.

Assurance Opinion

A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Number of Actions

Priority	Number
Priority 1	0
Priority 2	0
Priority 3	1
Total	1

Risks Reviewed

Risks Reviewed	Assessment
1. Inadequate treasury management arrangements in place, resulting in financial loss.	Low
2. If bank reconciliations are not regularly carried out, there is a risk of inaccurate financial reporting, loss of income and fraud.	Low
3. If previous recommendations made are not implemented, the organisation may be open to unnecessary risk exposure	Low

Key Findings

One Priority 3 recommendation is still outstanding from the 2018/19 Treasury Management and Bank Reconciliations audit. The Business Partner Accountant has committed to completing the agreed action by the end of January 2021.

A new cashflow monitoring spreadsheet has been implemented at WODC which is updated monthly by the Senior Technical Accountant and provides an easy to view summary for the Chief Finance Officer. This is also planned to be replicated for the other Councils.

Bank reconciliations sampled were found to be accurate and signed off by an appropriately senior and independent officer.

Audit Scope

A high-level review will be completed in the following areas:

- Follow up on last year's recommendations
- Treasury Management reporting process
- Cashflow forecasting

Discussions were held with the Publica Business Partner Accountant and the Senior Accounting Technician. Evidence to support discussions was requested where appropriate.

Bank statements and the bank reconciliations from October 2020 were reviewed for all Councils and Publica.

Next Steps

One action has been agreed with management, attached as Appendix 1. All actions are due to be implemented by the 31st of January 2021. We will follow up to assess progress towards the agreed priority 3 action in due course. A summary of the key findings from our review will be presented to the Audit Committees and Publica Board.

High Priority Findings and Agreed Actions APPENDIX D

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Asset Management 44678	2	Reconciliation between the Uniform system and the Council's finance system is not completed as per the Financial Rules.	Work with finance to implement a process whereby income recorded in Uniform is reconciled with the Business World system in accordance with the financial rules.	May 2021	
ICT Incident Management 44560	2	As part of the Information Security framework of policies, the Incident Management Policy is out of date and requires review, update, and approval. Update of the policies has been impacted by the Covid-19 pandemic, and the need for a review is recognised by the ICT Audit & Compliance Manager.	ICT Audit and Compliance Manager will review and update all ICT Security Policies following the completion of the Cyber Security audit report. The aim to have drafted policies by April 2021 for circulation to all network users.	April 2021	
ICT Incident Management 44562	2	There is a lack of detailed standard operating procedural documentation. Incident management investigation is currently based on a high-level process flow-chart denoted in the Incident Management policy; however, this lacks detailed information on how to conduct an incident investigation.	We have now commenced with documenting our cyber incident and investigation managements procedures	On Going	
Planning Process and Complaints 42323	2	The 2009 Customer Relations Framework must be removed from the website and replaced with the new policy and procedure as soon as possible. This guidance must be cascaded to all staff urgently, so that a consistent and robust process is implemented.	The new Policy and Procedure will be taken to Cabinet for approval in January 2021 and the website will be updated as soon as possible thereafter.	Feb 2021	

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Payroll 43699	2	We recommend that all new starters are subject to a BPSS (or similar) check regardless of the role to which they are being recruited. This will ensure that consistent checks of right to work, employment history and basic criminal record checks are carried out on all employees.	A piece of work has been carried out to re-write the pre-employment check process. The HR and Recruitment Teams are also working towards the implementation of an Application Tracking System (ATS), subject to approval at Publica and the Councils, which would help to mitigate the risks identified. The ATS would not allow for progression in the recruitment and onboarding process without specific criteria being fulfilled first (e.g. obtaining references, ID checks etc).	Sep 2020	Will be followed-up during the annual audit
Procurement and Contract Management 42974	2	Assurance is sought from Publica that the Procurement and Contract Management Strategy is reviewed and updated to ensure it meets the needs of Publica and the partner Councils.	Agreed	Sep 2020	Implementation date changed to 31st December 2020 to reflect amended target implementation date of majority of Procurement/Procurement & Contract Management recommendations to be actioned by Publica Procurement.
Safer Recruitment 41384	2	We recommend that HR policies relating to DBS issues and recruitment of ex-offenders are reviewed to ensure they are still relevant and are updated in line with current procedure and legislation.	These policies will be reviewed to assess whether they are still relevant and necessary, and updates made accordingly.	Aug 2020	Will be followed-up during the annual audit

Unrestricted

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Accounts Receivable 43752	2	Duplicate subscriptions should be reviewed, and appropriate corrections made. Any duplicate payments should be returned to the debtor.	All subscriptions will be corrected where applicable. Will discuss with team to ensure that prior to setting up new subscriptions a search for existing subscriptions is performed. If any queries arise the AR officer will refer to the service area for clarification. Responsible Officer – AR Team Leader	Aug 2020	Will be followed-up during the annual audit
Integrity of Data 41689	2	We recommend that CBC consider onboarding to the Business World Self-Service functionality for sickness reporting. This will enable line managers to enter sickness periods immediately, or as soon as practically possible, and also provides Payroll with up to date absence information. This would then reduce potential delays encountered due to manual forms being requested, delivered and sometimes chased by Payroll. It would also reduce any risk of mistakes being made with the additional manual input of sickness data.	This project has commenced and will be completed early next year.	Jun 2020	This work was temporarily parked due to the pandemic. It has been picked up again now. Further follow-up required

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Integrity of Data 41980	2	We recommend that precise work instructions to complete MI reports are documented so that personnel responsible for producing MI reports, are able to gather and report on the information in a consistent and accurate manner, especially as the process is only undertaken once every three months. We also recommend that, peer review is completed on management information to verify its accuracy.	Work has commenced to gather, store and utilise MI data centrally. The work is being overseen by the Contract Manager.	Mar 2020	Follow-up delayed due to Covid-19.
Integrity of Data 41849	2	As stated by Publica HR, we recommend that a project be initiated to review and bring up to date CBC employee's personal data. HR Processes should also ensure that required data is captured and recorded accurately.

CBC should work with the HR service to determine the information they require to be collected as part of the refresh project and ongoing collection.

Availability of Self-Service functionality to empower employees to view and update their own personal information should be investigated.

Personal data collection and use should be completed in line with the Data Protection legislation, including the deletion of records that are no longer necessary. | We will commence work to update the emergency contact data for CBC employees by end of Feb 2020.
We have shared the data that we could collect with CBC and we are investigating with ICT how we can develop self-service so that employees can view and update their personal information – we will provide a plan on how this could be undertaken this by 31st March 2020 | Mar 2020 | This work was temporarily parked due to the pandemic. It has been picked up again now.

Further follow-up required |

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Human Resources (Use of Volunteers) 42368	2	We recommend that all volunteers that have signed historic version of the application form are asked to sign their consent to the current data protection arrangements and retention period. The current Volunteer Privacy Statement should also be brought to the attention of all volunteers who have not previously been made aware of it.	To strive to ensure that volunteers with historic consent forms are signed up to the 5-year data protection arrangements and retention period.	Mar 2020	The Participation and Engagement Team Leader advised the following: "Volunteers with 18 month consent have been deleted as their consent has expired. For those on a 5 year, but different version form, we are holding off contacting them to renew paper work until a volunteer role is available to advertise. Our thoughts are that people are more likely to fill out the new form if there is a role they wish to do. If we send the forms out cold now, but have no role to offer them I think we will have a much lower take up and risk more people not getting back to us or being asked to be taken off the records." Recommendation actioned and closed

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Human Resources (Use of Volunteers) 42379	2	We recommend that a copy of a constituted group's Safeguarding Policy is received and reviewed by CBC officers before the group is allowed to participate in voluntary work on behalf of the Council.	Participation and Engagement Team leaders to review Safeguarding policy process with CBC Partnership Team Leader to agree on appropriate approach.	Mar 2020	The Participation and Engagement Team Leader advised that group applications would be put on hold until advice was sought from the Safeguarding Board/CBC Safeguarding Officer She also advised that she processes the applications so the process hasn't been documented but does see value in this being documented. Suggested wording to be included in the staff guidance document? 1.To direct any members of the public who have made direct contact with you to complete the volunteering application form to register as a CBC volunteer. If a group would like to volunteer, please direct them to complete the group application form. This form goes to the Participation and Engagement Team Leader to assess their suitability. As part of the application process groups are asked to sign the form to state that they have an accurate and up to date safeguarding policy in place. If this is not present or deemed insufficient, the application will be put on hold until they have received guidance from the safeguarding board or CBC officer. Recommendation actioned and closed
Property Use of Contractors 42872	2	We recommend that the Property Services team, return any invoice that does not contain detailed information on the works completed, including materials and labour costs and ensure only sufficiently detailed invoices are approved for payment.	We have contacted the contractors and requested that a breakdown of invoices are provided in all cases. All staff have been instructed to return invoice if they are not adequately broken down.	Mar 2020	At the end of April 20, the service manager reported to senior management as follows: Contractors have been asked for more information on their invoices or back up documentation, where possible this is now being stored on uniform still needs developing more. Revised implementation date to 31/12/20 due to Covid-19

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Property Use of Contractors 42062	2	We recommend i. that the frequency of budget monitoring and reconciliation between the Council's financial system and the Uniform system is undertaken in accordance with the Financial Rules so that any issues related to budgets and expenditure are identified at an early stage. Regular management information reporting should be implemented to ensure transparency of the situation. ii. Consideration should be given to investigating whether the Uniform and Business World systems can be linked to aid budget monitoring processes.	Publica Finance has now appointed an accountant to liaise with and we will reconcile the Uniform and Agresso figures quarterly. Reviews are set up to feed into the financial reporting cycle. A brainstorming session has been set up to review the way Uniform and Agresso are used and explore what functionality and data can to be shared across systems. Once this is determined, we will liaise with Publica IT to progress further.	Mar 2020	At the end of April 20, the service manager reported to senior management as follows: Link requested for uniform to agresso link, with Programme Manager representing the corporate body for consideration, still doing manual quarterly process at present, with finance. Revised implementation date to 31/12/20 due to Covid-19
Property Use of Contractors 42058	2	We recommend i. that process documents and associated procedures, aligned with CBC's Contract and Financial Rules, are documented and put in place so that a consistent approach to tasks can be followed and undertaken within the team as soon as possible. ii. A review of the service design should be undertaken to ensure that appropriate and effective processes and structures are in place.	Develop flow charts and sub processes to be agreed and signed off by section 151 officer. Started and talked already with Director and Publica Procurement to produce report on options going forward for strategic procurement of building related needs.	Mar 2020	At the end of April 20, Service Manager reported to senior management as follows: a.Procurement have set up the under £25k system and templates are used for works over £10k and under£ £25k b.Draft procedures as item 1 awaiting feedback. (rec. 42057) Revised implementation date to 31/12/20 due to Covid-19

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Property Use of Contractors 42057	2	We recommend: i. that unless specialist skills are required to complete specific works, only approved framework contractors are used for general building works. ii. that the progress of updating the contractor framework is pursued and if necessary escalated through Publica/One Legal Client Officers and Senior Management to ensure focus on this requirement is maintained.	Now using only framework contractors or obtaining waivers for non-specialist works. Additional frameworks are being pursued though One Legal for use of the GCC framework and Publica Procurement for additional frameworks.	Mar 2020	The Service manager reported to senior management at the end of April 20 as follows: a.Procurement have not sent out the framework tender for small contractors despite various chase ups b.GCC are no longer responding to us about their framework and use rates etc. so we are struggling to use that one c.Process for agreeing best value under 10k drafted I am awaiting feedback before it can be finalised. Revised implementation date to 31/12/20 due to Covid-19
Systems Admin 41204	2	We recommend a principal Identity and Access Management process detailing requirements for 'Joiners, Movers and Leavers' is developed and documented and that complies with the requirements set out in the Information Security and Access Control Policy. The overarching process should apply to and embrace all systems that may not be included within the standard ICT team scope and should be available for all employees to view and follow. System administrators should then document or update local processes and procedures that should be in alignment with the overarching policy and process requirements. and documented on a quarterly basis as per the requirements of the Risk Management Policy	Our team ICT Administrators are now updating and documenting our Access Management system process for joiners, Movers and Leavers. A change control process will be introduced that will document significant changes to the ICT infrastructure which will also align to our ICT User Policies and guidance.	Mar 2020	Flowcharts have been produced for the starters / leavers / variation processes. The ICT Audit and Compliance Manager will refresh the ICT Policies following the completion of the Cyber Security audit report. He is aiming to have drafted policies by March 2020 for circulation / consultation at CGG and JMT. Further follow-up has been included in the 2020/21 audit plan Revised implementation date to 31/12/20 due to Covid-19

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Apprenticeship Scheme 42609	2	We recommend that a reconciliation process is implemented for Apprenticeship Levy payments.	Reconciliation is now carried out monthly between the Finance spreadsheet, the General Ledger and the online apprenticeship levy portal. Support will be requested from Finance to ensure reconciliation is being done correctly in the initial stages. The internal apprentice recruitment form has also been amended to ensure that the recruiting manager consults with the Finance Department to ensure there is appropriate levy funding available in the online account before the post goes for approval at the Resource Managers Group.	Implemented & ongoing (to be followed up Feb 2020)	Recommendation followed up but no response was received from the service. Due to the lapse in time the recommendation has been closed.

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Procurement 41181	2	A copy of the approved contract must be held on In-Tend for all contracts over £5,000, as well as the quotes used during the tendering process, to demonstrate best value and ensure there is a complete central record.	Agreed, subject to a review of the contract value requirements.	Dec 2019	The Senior Procurement Business Partner demonstrated the Contracts Module on In-Tend during fieldwork. We were advised that all new contracts since the implementation of the Contracts Module (October 2019) have been input into In-Tend. These contracts are being managed by the Procurement Team via this system in terms of monitoring of contract expiry dates. We were able to confirm all relevant documentation (including a copy of the approved contract) was stored for the sampled CBC contract. We were advised by the Senior Procurement Business Partner that it is intended that contracts that were already in place at the time that the Contracts Module was implemented will be loaded into the system in the same way as new contracts, but the speed at which this can be done is dependent on available resources to carry out the work. To assist them in managing existing and future contracts, the Procurement Team have implemented a future Work Plan for all authorities. Revised implementation date to 31/12/20 due to Covid-19
Procurement 41029	2	Budget Holders should regularly undertake monitoring of expected contract spend to actual contract spend as part of contract monitoring, to ensure contracts are managed in accordance with strategy, and inform Procurement of any changes to contract values to ensure the values recorded on the Contract Register are correct.	Agreed	Dec 2019	No evidence has been provided of actions carried out by responsible officers to support implementation of this recommendation at the time of follow-up. As part of the 2020/21 Audit Plan, an audit of the Management and Monitoring Contracts will be carried out. The scope of this audit will include budget monitoring arrangements in relation to contract spend and will therefore inform the follow-up of this recommendation. Revised implementation date to 31/12/20 due to Covid-19

Unrestricted

Audit Name	Priority	Agreed Actions	Agreed Action	Due Date	Update January 2021
Business Continuity Management 39756	2	Consideration should be given to the clarity of the existing template and its ability to guide an officer in difficult and stressful times, and adopting an existing template, to better meet the authority's responsibilities.	An independent review of the CBC BCPs has been agreed with the Civil Protection Team this will commence after April 2019 when resources become available. The Corporate BCP will be identified as the first plan to be reviewed.	Jun 2019	Review of the new BCP template confirms that the format provides clear guidance, roles, and responsibilities so that in the event of business disruption, officers can easily see what actions need to be taken to enable a swift recovery. In September 2019, an officer from the GCC Civil Protection team delivered a mandatory training session for all service managers. We were advised the officer followed up the training with 1:2:1 sessions to ensure that service specific matters were addressed. The Programme & Governance Manager advised that due to the Covid-19 pandemic, the Corporate BCP has not been updated to the new format. Agreed to extend implementation date to 31/10/20

Summary of all Agreed Actions from April 2019 and Progress against them

CBC ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/19)	0	11	9	20
Open and current		2	4	6
Open and Outstanding/Overdue Subject to follow up	0	1	0	1
Open with date extended	0	6	3	9
Closed	0	2	2	4

PUB ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/19)	0	7	5	12
Open and current	0	2	4	6
Open and Outstanding/Overdue Subject to follow up	0	2	0	2
Open with date extended	0	2	1	3
Closed	0	1	0	1

Overall
CBC and Publica Actions Progress

Legend:
- ■ Open and current
- ■ Open and Outstanding/Overdue Subject to follow up
- ■ Open with date extended
- ■ Closed