SIAS
Shared Internal Audit Service
Hertfordshire in Partnership

Three Rivers District Council
Audit Committee Progress Report
30 November 2023

Recommendation

Members are recommended to:
- Note the Internal Audit Progress Report for the period to 17 November 2023
- Approve amendments to the Audit Plan as at 17 November 2023
- Agree changes to the implementation date for 3 audit recommendations (paragraph 2.5) for the reason set out in Appendices 3 to 7
- Agree removal of implemented audit recommendations (Appendices 3 to 7)

Contents

1. Introduction and Background

<u>Purpose of Report</u>

1.1 This report details:

a) Progress made by the Shared Internal Audit Service (SIAS) in delivering the Council's annual audit plan for 2023/24 as at 17 November 2023.
b) Proposed amendments to the approved 2023/24 Annual Audit Plan.
c) Implementation status of all previously agreed audit recommendations from 2019/20 onwards.
d) An update on performance management information as at 17 November 2023.

<u>Background</u>

1.2 The work of internal audit is required to be reported to a Member Body so that the Council has an opportunity to review and monitor an essential component of corporate governance and gain assurance that its internal audit provision is fulfilling its statutory obligations. It is considered good practice that progress reports also include proposed amendments to the agreed annual audit plan.

1.3 The 2023/24 Annual Audit Plan was approved by Audit Committee on 28 March 2023.

1.4 The Audit Committee receives periodic updates on progress against the Annual Audit Plan from SIAS, the most recent of which was brought to this Committee on 28 September 2023.

2. Audit Plan Update

<u>Delivery of Audit Plan and Key Audit Findings</u>

2.1 At 17 November 2023, 41% of the 2023/24 Audit Plan days had been delivered (calculation excludes unused 'To Be Allocated'). Appendix A provides a status update on each individual deliverable within the audit plan.

2.2 The following 2023/24 final reports have been issued since the September 2023 Audit Committee.

Audit Title	Date of Issue	Assurance Level	Number and Priority of Recommendations
Taxi Licensing	Sep '23	Reasonable	Two Medium Two Low
Fast Followers IAR Grant	Oct '23	Unqualified	N/A

<u>All Priority Audit Recommendations</u>

2.3 Members will be aware that a Final Audit Report is issued when agreed by Management. This includes an agreement to implement the recommendations made. It is SIAS's responsibility to bring to Members' attention the implementation status of recommendations; it is the responsibility of officers to implement the recommendations by the agreed date.

2.4 The table below summarises progress in implementation of all outstanding internal audit recommendations as at 17 November 2023, with full details given in appendices 3 to 7:

Year	Number of Recommendations	Implemented	Not yet due	Outstanding & request made for extended time or no update provided	% implemented
2019/20	37	36	1	0	97%
2020/21	25	24	1	0	96%
2021/22	36	34	2	0	94%
2022/23	44	34	7	3	77%
2023/24	4	2	2	0	50%

2.5 Since 28 September 2023 Audit Committee, extension to implementation dates have been requested by action owners for 3 recommendations as follows:

- One from the 2022/23 Financial Reconciliations audit, with a revised target date of 31 December 2023 (was 30 November 2023),
- One from the 2022/23 Treasury audit, with a revised target date of 31 January 2024 (was 30 November 2023), and
- One from the 2022/23 Fixed Asset register audit, with a revised target date of 31 December 2023 (was 31 October 2023).

<u>Proposed 2023/24 Audit Plan Amendments</u>

2.6 A Net Zero: Fast followers Grant certification was completed by the target date of 31 October 2023, with the time taken from the generic allocation of 'Grant Claims – to be allocated'.

<u>Reporting of Audit Plan Delivery Progress</u>

2.7 To help the Committee assess the current position in terms of progress against the projects in the 2023/24 Audit Plan, an analysis of agreed start dates is shown at Appendix 2. Dates have been agreed with management and resources allocated accordingly.

2.8   The 2023/24 Annual performance indicators and targets were approved by the SIAS Board in March 2023. Actual performance for Three Rivers District Council (including the Shared Services Plan) against the targets that are monitored in year is set out in the table below.

Performance Indicator	Annual Target	Profiled Target to 17 November 2023	Actual to 17 November 2023
1. **Planned Days** – percentage of actual billable days against planned chargeable days completed (excludes unused contingency)	95%	45% (100 / 221 days)	41% (90.5 / 221 days)
2. **Planned Projects** – percentage of actual completed projects to draft report stage against planned completed projects by 31st March 2024	90%	39% (7 out of 18 projects to draft)	28% (5 out of 18 projects to draft)
3. **Planned Projects** – percentage of actual completed projects to Final report stage against planned completed projects by the production of the HoA Annual Report	100%	N/A	11% New Indicator – first measurement will be May 2024 (Currently 2/18 delivered to final report stage)
4. **Client Satisfaction** – percentage of client satisfaction questionnaires returned at 'satisfactory overall' level (minimum of 39/65 overall)	95%	100%	50% (based on two received from fifteen issued in 2023/24)
5. **Number of Critical and High Priority Audit Recommendations agreed**	95%	95%	100% (based on one high priority recommendation made)

2.9   In addition, the performance targets listed below are annual in nature. Performance against these targets will be reported on in the 2023/24 Head of Assurance's Annual Report:

- **6. Annual Plan** – prepared in time to present to the March meeting of each Audit Committee. If there is no March meeting, then the plan should be prepared for the first meeting of the financial year.

- **7. Head of Assurance's Annual Report** – presented at the Audit Committee's first meeting of the civic year.

2023/24 SIAS Audit Plan

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS				AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		C	H	M	L				
Key Financial Systems									
Benefits (Shared Services Plan)						10	SIAS	2	Terms of Reference Issued
Debt Recovery (Shared Services Plan)						12	SIAS	1	In Planning
Key Financial Controls Testing (Shared Services Plan)						12	BDO	5	In Fieldwork
Main Accounting / Creditors – Control Risk Assessment (Shared Services Plan)						9	SIAS	1	In Planning
Payroll (Shared Services Plan)						10	No	0	Allocated
Parameters Testing (Shared Services Plan)						3	SIAS	3	Draft Report Issued
Operational Audits									
Agency Staffing (Shared Services Plan)						12	SIAS	6	In Fieldwork
Emergency Planning						8	No	0	Not Yet Allocated
Performance Management / Data Quality						15	SIAS	0.5	In Planning
Property Services						10	BDO	0.5	In PlanningNot Yet Allocated
Safeguarding						10	BDO	9.5	Draft Report Issued
Taxi Licensing	Reasonable	0	0	2	2	9	SIAS	9	Final Report Issued

| AUDITABLE AREA | LEVEL OF ASSURANCE | RECS | | | | AUDIT PLAN DAYS | LEAD AUDITOR ASSIGNED | BILLABLE DAYS COMPLETED | STATUS/COMMENT |
		C	H	M	L				
Temporary Accommodation						8	No	0	Not Yet Allocated
Watersmeet Theatre						8	SIAS	6	In Fieldwork
Contract Management									
Procurement of Play Areas / Small Outdoor Leisure Facilities						8	No	0	Not Yet Allocated
Grant Certifications									
Grant claims – to be determined						2	No	0	Not Yet Allocated
Net Zero: Fast Followers Grant	Unqualified	-	-	-	-	2	SIAS	2	Final Report Issued
IT Audits									
IT Operations (Shared Services Plan)						15	BDO	14.5	Draft Report Issued
Cyber Security (Shared Services Plan)						15	BDO	0	Allocated
To Be Allocated									
Unused Contingency (Shared Services Plan)						0	N/A	0	N/A
Follow-Up Audits									
Follow-up of outstanding audit recommendations						8	Yes	6	Through Year
Strategic Support									
2024/25 Audit Planning						5	Yes	0	Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS				AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		C	H	M	L				
Audit Committee						8	Yes	5.5	Through Year
Head of Internal Audit Opinion 2022/23						3	Yes	3	Complete
Monitoring and Client Meetings						7	Yes	4	Through Year
SIAS Development						3	Yes	3	Complete
2022/23 Projects Requiring Completion									
2022/23 Projects Requiring Completion (5 days TRDC plan / 4 days Shared Services Plan)						9		9	Complete
TRDC TOTAL						**119**		**54**	
SHARED SERVICES TOTAL						**102**		**36.5**	
COMBINED TOTAL						**221**		**90.5**	

Key to recommendation priority levels:
C = Critical, H = High, M = Medium, L = Low

APPENDIX 2 2023/24 AUDIT PLAN PROJECTED START DATES

Apr	May	Jun	July	Aug	Sept
	Parameters Testing (Shared Services Plan) **Draft Report Issued**	IT Operations (Shared Services Plan) **Draft Report Issued**	Agency Staffing (Shared Services Plan) **In Fieldwork**	Watersmeet Theatre **In Fieldwork**	Debt Recovery (Shared Services Plan) **In Planning**
	Safeguarding **Draft Report Issued**		Taxi Licensing **Final Report Issued**		Performance Management / Data Quality **In Planning**

Oct	Nov	Dec	Jan	Feb	Mar
Key Financial Controls Testing (Shared Services Plan) **In Fieldwork**	Benefits (Shared Services Plan) **Terms of Reference Issued**	Payroll (Shared Services Plan)	Cyber Security (Shared services plan)		
Property **In Planning**	Temporary Accommodation	Procurement of Play Areas / Small Outdoor Leisure Facilities	Emergency Planning		
Main Accounting / Creditors – Control Risk					

Oct	Nov	Dec	Jan	Feb	Mar
Assessment (Shared Services Plan) **In Planning**					
Net Zero: Fast Followers Grant Certification Final Report Issued					

APPENDIX 3   OUTSTANDING RECOMMENDATIONS FROM THE 2019/20 AUDIT PLAN

Property (Rent and Lease Administration) 2019/20							
Final report issued October 2019							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✔	Revised Deadline
01	We recommend that the Council review the systems used to maintain records of Council owned properties.	Medium	Position (September 2022) Progress on the implementation of the Property Management System continues at pace. Data held on the Councils IDOX system has been identified and a bulk extraction & cleansing of that a data has commenced. Mapping data held on the Council's ArcGIS system and ownership data held by the Land Registry is being compared, so that an accurate, and up to date ownership 'layer' can be produced. Once completed, this work will significantly reduce the time taken to establish ownership of TRDC assets and respond to customers. The mapping data will be cross-referenced with the Property Management System so that changes in ownership, new lettings or lease terminations can be reflected in the mapping 'spatial' data (mapping layers). The priority since acquiring the Property Management System is to have the garage properties/tenant records populated and the system fully functional for garage management as soon as possible. The Project Team had set a target date of the end of October 2022 to reach that stage and we are well on track to meet that target. Position (November 2022) Basic data on TRDC's property assets is currently being added to the Trace 'upload' spreadsheets and this work is likely to be concluded by the end of 2022. A data extract report is being downloaded from the IDOX system and any useful information will be	Head of Property Services / Property & Legal Services Teams	31 January 2024	✘	

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
Property (Rent and Lease Administration) 2019/20 **Final report issued October 2019**							
			added to the Trace spreadsheet for uploading to the system. A complete ownership layer of assets and unregistered assets has been created by the Council's GIS Officer. This is a major step forward in being able to visually identify land owned or occupied by TRDC, without the need to download Land Registry Office Copies. The next stage is to correlate the data held on the GIS system with data being uploaded in the Trace system – these are likely to be linked by reference to the UPRN (Unique Property Reference Number). The garage management aspect of the Property Management System is now operational. This follows an intensive period of data-loading, testing and training. CSC colleagues are now getting to grips with the new system in order to manage the Council's garage estate. Minor improvements and amendments will e made in the coming weeks and months, but this stage marks a major milestone in the roll out of the Property Management System. Position (March 2023) The garage management data has been uploaded into the Trace system. Final data reconciliation and testing between the Property and CSC Teams is nearing completion and the official 'go live' for garage management via the Trace system will commence from 1 April 2023. This is all on target.				

APPENDIX 3   OUTSTANDING RECOMMENDATIONS FROM THE 2019/20 AUDIT PLAN

Property (Rent and Lease Administration) 2019/20
Final report issued October 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			The focus now switches to collating and uploading data relating to TRDC's Commercial Estate. The property and asset addresses have been uploaded into the system and the next stage of work will shared between the Property & Legal Teams. Presently both Teams are recruiting key individuals who will lead on this work for the respective Services. In the intervening period, colleagues from the Property Team will continue with scoping and data collection work. Position (July 2023) Garage data has been loaded and reconciled and the Property Management system is being used for the management of garages – reports and processes have been provided. The GIS link has been applied and is currently being tested. Recruitment for a temporary staff member has commenced and once in place will continue with the data collection for the commercial properties. Position (September 2023) GIS link is working. The temporary Officer has been appointed and will start to load the commercial property data. A full procedure has been created to ensure consistency. Full training will be given. Financial data is being collated to compliment the PMS. On target for completion 31st January 2024 **Position (November 2023)**				

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Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
Property (Rent and Lease Administration) 2019/20 **Final report issued October 2019**							
			The Temporary Property Data Analyst is currently engaged in collating data in connection with the Council's commercial property portfolio. The work remains on target for completion 31st January 2024				

Debtors 2020/21
Final report issued June 2021

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
03	Consideration should be given to an annual review of debtor accounts to identify duplicate or dormant for deletion or deactivation.	Low	Position – July 2021 We will speak to Finance about the best way of doing this. Position – September 2021 A complete review of the entire Sundry Debtor service has recently been commenced and this will be included as part of the review. Position – November 2021 No update received. Position – February 2022 No update received. Position – July 2022 To date we have not been able to resource this review as we have had to prioritise Grant work and more recently the Council Tax Energy Rebates. We will pick up this project towards the end of the calendar year once the Energy rebate work is completed. Position – August 2022 No update received – target date not yet reached. Update received September 2022 but after reporting deadline for September 2022 Audit Committee: Finance are going to run and extract this data from the Finance System which Revs & Bens will then check. It may be completed before 30 October 2022; it really depends on how many are on the list. Position – November 2022	Recovery Team Leader, Revenues Manager and Finance.	31 August 2021	✗	31 October 2021 31 October 2022 31 December 2022 30 June 2023 31 December 2023

Debtors 2020/21							
Final report issued June 2021							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			The lists were provided by Finance mid-September, but work has not yet commenced as the entire Revs and Bens Service was delivering the Energy Fuel Rebate payments. Work will commence on the lists, week commencing 14.11.22. Position – February 2023 Revs and Bens have not had the capacity to carry out this work yet as resource has diverted to Energy Fuel Rebate schemes and resource has been very low due to long term staff sickness. Revs and Bens will take ownership of checking duplicate customer account and deleting those where we are certain there is no current billing rule. Finance and the individual services will need to take responsibility for deleting or de-activating old accounts. We will remind them of this requirement. Position – July 2023 The list has been generated and there are 2252 accounts to check. Each one must be checked individually before it can be decided if the duplicate entry can be deleted. Work has commenced on the checking / deletion. We are allocating a little resource to this each week as BAU work is extremely high currently so it will take some time to check all 2,000 accounts. Position – September 2023 Revenues Manager 12.09.23 This recommendation is a low priority, and we continue to be under resourced, which means the focus on housekeeping projects is not as high as we would like. This is progressing slowly because it needs to be managed				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
Debtors 2020/21 **Final report issued June 2021**							
			around BAU. Some further analysis of the reports from Finance is needed because some customers should have multiple account references, where, for example they are being billed for different services, such as Rent, Trade Waste, or for multiple units if they are a larger business. **Position – November 2023** **We have limited resource in the Recovery Team and BAU work takes precedence, but we continue to review these accounts.**				

Cyber Security 2021/22
Final report issued April 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline

01	1.1 Management should ensure that appropriate monitoring controls are in place for the password monitoring and management activities. These should include but not be limited to the following:
	
	• brute-forcing of account passwords including password spraying,
	• login attempts from unexpected geographic areas,
	• unexpected account lockouts
	• password database for the deny list hashes,
	• other unusual behaviour from users.
	
	1.2 The above proposed controls, once in place, should be actively reported upon, through the periodic cyber security reports, to the senior management.
		Medium	01 Mar 2022 the Azure AD Password Protection was implemented. Users will not be able to **change** passwords to weak passwords nor known passwords nor passwords from our Ban List of passwords.
			
			1.1 – requires a third-party tool and associated funding would be required. The implementation of the password protection for Azure AD lowers the risk.
			
			1.2 - this would be dependent on the ability to fund with a third-party tool – 1.1.
			
			Position – July 2022
			Third party tools currently being reviewed and costed. Item not yet due.
			
			Position – August 2022
			1.1 - Third party tools have been evaluated and Netwrix has been selected as the preferred tool.
			
			1.2 – Netwrix had demonstrated the tool in detail and a 30-day trial to test the system further is available.
			
			1.3 – Quotation for 1- and 3-year option has been provided.
			    • 1-year option - £7,806
			    • 3-year option - £16,483
			
			1.4 – Implementation of the tool will be dependent on the ability to fund the third-party tool, this will require an approval by ITSG for an additional spend. A paper to review this recommendation and request any growth in
				Associate Director of ICT and Shared Services	31 March 2023	✗	31 March 2024

Cyber Security 2021/22							
Final report issued April 2022							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
			budget 2022.				
			Position – November 2022				
			1.1 – Due to the audit, which was performed by DLUHC, the scope of the security posture has extended. The grant to address the sections of the new recommendations within the scope has been successfully secured.				
			1.2 – The evaluation of the third-party tool has been extended, due to the new requirements within the scope presented post the DLUHC audit.				
			1.3 The new proposed completion dates recommended by DLUHC is end of Q4 March 2024.				
			Position – February 2023				
			In progress. Produce options and costs continue to be reviewed and costed against all recommendations included within the DLUHC cyber grant budget.				
			Position – July 2023				
			1.1 – All available options offered by a number of vendors have been evaluated. The decision has been made to utilise the DLUHC grant and to expand on the existing CSOC provision from Exponential-e to meet the requirements of the recommendation.				
			1.2 The quotation has been provided from Exponential-e to expand the CSOC offering. This has been approved and the project is now moving to the procurement phase. The procurement should be completed by the end of October 2023.				

Cyber Security 2021/22							
Final report issued April 2022							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			Position – September 2023 1.1 The procurement to expand the CSOC offering is completed, duration of the contract is set for 24 months. 1.2 – The on prem virtual deployment is currently in progress, deadline to implement the solution is set for end of October 2023. **Position – November 2023** **1.1 The implementation phase is completed, finetuning and baselining of the alerting with the vendor to reduce the false positives. This phase is expected to run over 8 week period.** **1.2 Once the finetuning and baselining is completed, it will be handed over to CSOC for monitoring, triage, and remediation**				
03	Management should conduct regular monthly vulnerability scans across the entire IT estate including endpoint, to identify and mitigate vulnerabilities including software flaws, missing patches, misconfigurations and malwares.	Low	This would require additional budget and would need a growth item approved, as there are licence implications for the Qualys scanner. Position – July 2022 Extension of current third-party tools currently being reviewed and costed. Item not yet due. Position – August 2022 1.1- Third party Qualys had introduced a new module which will enable the management of remote devices through the cloud. 1.2 – Both options are currently being evaluated and costed. Decision made will be based on cost, functionality, and management.	Associate Director of ICT and Shared Services	31 March 2023	✗	~~30 June 2023~~ 30 November 2023

Cyber Security 2021/22
Final report issued April 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			Position – November 2022 1.1 – Due to the allocation of a new Account Manager at Qualys and the changes within the licensing structure, Qualys are currently reviewing the proposed quotation to align the requirements with the new licensing structure. 1.2 – Workshop with Qualys has been scheduled to discuss the new proposed licensing structure and the modules which are required to enable the management of the devices remotely through the cloud and not relaying on the VPN. Position – February 2023 Remains in progress, however Associate Director of ICT and Shared services requests an extension of 3 months. This is due to a. Qualys licencing for public sector has recently changed. Awaiting updated quotations. b. In terms of funding, a recent grant award from DLUHC will cover this item. Therefore, no requirement for additional growth within the ICT service budget. Position – July 2023 1.1 The quotation from Qualys has been provided to extend the service to include the endpoint vulnerability scanning. This has been handed over to the desktop support team, who are currently reviewing the offering. Position – September 2023				

Cyber Security 2021/22

Final report issued April 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			1.1 The revenue budget is currently being reviewed by the Director of Partnerships in absence of the Associate Director of ICT and Shared Services. **Position – November 2023** **1.1 Meeting took place with LittleFish 15 Oct – they are preparing a quote for us to consider.** **1.2 Direct meeting with vendor Qualys has take place to review available options and pricing. Request for a full system demo has been submitted, vendor to provide dates.**				

Complaints Handling 2021/22

Final report issued May 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	We recommend that when a complaint is received, it is not only forwarded to the Head of Service but also to the designated complaints officer within the service. The officer should then immediately log the complaint on Firmstep and monitor timescales through to resolution. This would give the designated officer more context into the complaint and allow them to help adhere to the Council's prescribed timescales for dealing with complaints. Additionally, we recommend that when a complaint is	High	Complaints to be communicated to the Designated Complaints Logging Officer as well as Head of Service/Complaints Officer at time of receipt. Discussions to take place with Departments to find the best way of delivering this across platforms. If via Enquiries email then CSC will email to the designated officer as well as the Head of Service. Logging Officer then responsible with logging the complaint in a timely manner and monitor timescales until resolution. Head of Service/Complaints Officer to send Logging Officer response so complaint can be closed asap on Firmstep. Position (July 2022) We are currently reviewing the Corporate	Customer Service Centre Team Manager	31 October 2022	✓	~~Implement~~ ed

Complaints Handling 2021/22
Final report issued May 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
	resolved this is noted immediately on Firmstep to ensure accurate information is available.		Complaints and Compliments Policy and Procedure with the intention that all complaints are to be logged by the Customer Service Centre. Centralising where the complaints are coming into will make us able to log the complaints immediately on receipt and help monitor response time from Departments. Once the complaint is logged it will be sent to the Department's Head of Service to investigate and respond to the complaint. Position (September 2022) We are currently reviewing the Corporate Complaints and Compliments Policy and Procedure with the intention that all complaints are to be logged by the Customer Service Centre. Centralising where the complaints are coming into will make us able to log the complaints immediately on receipt and help monitor response time from Departments. Once the complaint is logged it will be sent to the Department's Head of Service to investigate and respond to the complaint. This revised Compliments & Complaints policy is going to P&R Committee in November and will be put in place following approval. Position (November 2022) The new complaints and vexatious complaints policies were agreed at P&R on 7th November which are now live. Work is taking place in the creation of a new Corporate Complaints Procedure. These should be circulated by January 2023. Position (March 2023) Complaints procedure has been finalised and				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
Complaints Handling 2021/22							
Final report issued May 2022							
			work is continuing to be done so that members of the public are able to raise a complaint online using the self-service portal. Position (July 2023) We have finalised the wording for the Compliments and Complaints online forms, including internal and external correspondence. The forms have been built. Testing is underway to confirm function and raise any anomalies. This will allow members of the public to raise their complaints online using the self-service portal and Customer Service representatives to raise complaints as soon as they are received whether that is by email, letter, or over the phone. Completing and submitting the form will automatically log an open complaint on the Granicus system. (30th September 2023). Position (September 2023) We are currently in the final testing stage. We are on target to launch the new process for 1st October 2023. **Position (November 2023)** **The new procedure allows the complainant to log their complaint online which will log the complaint automatically on the Granicus system.** **A daily triage system is in place, and this will confirm whether the complaint will be dealt with in line with the compliments and complaints policy and if so, will be forwarded to the relevant department.** **Complaints received by alternative means will be dealt with under the same**				

Complaints Handling 2021/22

Final report issued May 2022

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			Compliments and Complaints policy. **Relevant departments' complaint handlers and Heads of Service have access to the Granicus case viewer for their service to view and respond to complaints. Customer Service Team Manager in charge of monitoring complaints response times also has access to see open complaint jobs and will prompt services accordingly.** **Once the complaint has been responded to then the job will be closed.**				

APPENDIX 6   OUTSTANDING RECOMMENDATIONS FROM THE 2022/23 AUDIT PLAN

Development Management – Pre-Application Fees 2022/23
Final report issued February 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
02	The Council should produce a line-by-line breakdown of the pre-application fees and charges and how they relate to the costs of the service to ensure that the costs are recovered fully and all resource requirements are considered adequately.	Low	**Position (March 2023)** It is proposed to undertake a full cost exercise that will take into account the cost of the team and organisational overheads for setting charges for 2024/25. **Position (July 2023)** Support from finance team needed to undertake this action. Finance team have to date been occupied by end of year work. HOS and TLs to discuss next steps with finance, however, six month extension suggested at this time to accommodate this work. **Position (September 2023)** Awaiting support from the Finance team. Still aiming for March 2024 completion. **Position (November 2023) Officers are discussing with Finance colleagues. Still aiming for March 2024 completion.**	Head of Regulatory Services / DM Team Leaders	30 September 2023	✘	31 March 2024

Financial Reconciliations 2022/23
Final report issued April 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
01	We recommend that the reconciliation procedure notes detail the responsible owner as well as the next review date to ensure they remain up-to-date and relevant.	Low	The process notes do name the author of the note; however, we will add a next review date and responsible person. We will introduce a front sheet on each reconciliation to provide all details recommended. Position – July 2023	Chief Accountant	31 August 2023	✘	~~30 November 2023~~ **31 December 2023**

Financial Reconciliations 2022/23
Final report issued April 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			Process notes are in the process of being updated – on target for completion by deadline. Position – September 2023 Process note updates are continuing but progress is slower than anticipated due to work pressures. Completion is expected by 30th November 2023. **Position – November 2023** **Work pressures from external audit continue to delay completion of the review and update work. Completion is now expected by 31st December 2023**				

Cyber Security 2022/23
Final report issued April 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	Management should review and assess the current cyber security training platform and put arrangements in place so that training completion can be recorded, reported and monitored on an going basis. Arrangements should be put in place for ensuring that the cyber security training is completed by all members of staff, as required, which could include: • Identifying specific staff members who are required to	Medium	We will review the current cyber security training platform. The current platform is used for all mandatory training for staff. We will review the viability of users not receiving their device until they have completed their cyber-related mandatory training. Position – July 2023 1.1 – A review of alternative training platforms has been conducted and a demo of the products has been provided by the vendors.	Associate Director of ICT and Shared Services	31 December 2023	✓	

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
	complete the training and working with their line managers to ensure completion. • Ensuring regular, top-down communication to increase awareness of the training. Requiring completion of the e-learning before issuing new devices to individuals or as part of performance and progression reviews.		1.2 - Each product comes at a cost and budget implications are being considered. 1.3 - The management of training completion by staff is currently being carried out by HR and members of staff are being notified by email when they are due to complete each training module. 1.4 – Starters, Movers, Leaver's process is currently being updated to ensure that joiners complete the Cyber Security Modules as part of the probation period as per HR Probationary Policy. Position – September 2023 1.4 – The Starters, Movers, Leaver's process has been updated to reflect the completion of the cyber security module as per the requirement of the HR Probation Policy. **Position – November 2023** **1.1 – W3R HR have updated the probation policies for each council (WBC and TRDC) with our suggested text - "Ensuring the employee has satisfactorily completed all mandatory training – including CyberEssentials training if the employee has an ICT account"** **TRDC policy** **WBC policy**				

Cyber Security 2022/23
Final report issued April 2023

Treasury 2022/23
Final report issued April 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	1) The Councils should develop an ESG policy, which ensures that investments are made in consideration with the Councils climate change, environmental and governance policies. The policy should emphasise that the Council seeks to be a responsible investor and consider ESG risks as an important overlay to the investment process, thereby improving future sustainability of investments. Once incorporated, ESG risks should also be included in under the Risk Management section of the Treasury Management Practices document for consistency.

2) The policy should also explain that the Councils will not knowingly invest directly in businesses whose activities and practices pose a risk of serious harm to individuals or groups, or whose activities are inconsistent with the Council's mission and values.

3) The policy should outline the conditions where investments should not be made with certain organisations, which have material links to:
• Human rights abuse (e.g., child labour, political oppression)
• Environmentally harmful activities (e.g., pollutants, destruction of habitat, fossil fuels)
• Socially harmful activities (e.g., | Medium | An ESG Policy will be developed for both Councils during 2023/24 for approval alongside the 2024/25 Treasury Management Strategy Statements.

Position – July 2023
Guidance has been provided by our Treasury Management providers and we are on target to include an ESG policy within the 2024/25 Treasury Management Strategy Statements.

Position – September 2023
We remain on track to include an ESG Policy in the Draft Treasury Management Strategy Statements for 2024/25 which will be presented to Audit Committees in November and December.

Position – November 2023
The draft ESG policies have been published for Audit Committees and will form part of the budget papers to Council in January (WBC) and February (TRDC). | Head of Finance | 30 November 2023 | ✗ | 31 January 2024 |

Treasury 2022/23
Final report issued April 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
	tobacco, gambling).						

Council Tax 2022/23
Final report issued May 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	TRDC should ensure that a review of debt outstanding is conducted, and decisions taken regarding whether or not to proceed for write-offs. Subsequently, write-offs should be conducted at regular intervals going forward. The 'How and Why to put a write off code on a Council Tax Account' procedure should include version control to ensure that it is reviewed periodically.	Medium	A review of all outstanding debt will be completed during 2023/24. All outstanding write-offs have been cleared since this report was written and on-going write-offs will be reviewed once a quarter. Agreed. Our quality team will get a version control sheet added. Position – July 2023 The review of all debt is underway, and this will include looking at debts suitable for write-off. The write-offs for Q1 are being prepared. Version control has been added to all procedures. Position – September 2023 Revenues Manager 12.09.23 The team continue to identify and put forward cases for write off where appropriate. **Position – November 2023** **Q1 write-offs have been prepared and await sign-off. Q2 write-offs are being prepared.**	Revenues Manager/Data Performance Manager	31 March 2024	✗	

APPENDIX 6   OUTSTANDING RECOMMENDATIONS FROM THE 2022/23 AUDIT PLAN

Council Tax 2022/23
Final report issued May 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
04	The Council should document the processes relating to backdated discounts and exemptions to ensure that consistent actions are undertaken by staff and these refunds are appropriately reviewed and approved prior to payment.	Low	Agreed. Position – July 2023 The document for backdating an SPD has been documented. We will incorporate the approach for all the other types of discount and exemptions so that it the guidance is held in once process. Position – September 2023 Revenues Manager 12.09.23 The processes are documented, they just need to be collated, which has been delayed due to the summer period. Management controls are in place to ensure appropriate review takes place prior to approval. **Position – November 2023** **The process notes for issuing refunds have been updated and refunds are authorised at Team Leader level prior to payment.**	Revenues Manager/Data Performance Manager	30 June 2023	✓	30 Sept 2023

NDR 2022/23
Final report issued May 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	We recommend that: • Actions are taken to address the issue preventing the production of the monthly 'default arrangement list' and (subject to the issue being successfully resolved), arrangements are put in place for	Medium	The default arrangements list is working and being run. During 2022/23 much of the BAU recovery work slipped due to the service having to process energy and business grants (CARF). During 2023/24 all recovery work will be reviewed, and this will include a review of arrangements that have defaulted.	Revenues Manager	31 March 2024	✗	

NDR 2022/23
Final report issued May 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
	Senior Officers to check that these are being actioned appropriately. • As an interim measure, Revenues Officers should be reminded to diarise arrangements to enable checks to be conducted to confirm arrangements are being complied with.		Position – July 2023 Review is currently underway. Position – September 2023 Revenues Manager 12.09.23 A review of the Recovery processes is ongoing and as part of this we are looking at the ways in which this can be managed more efficiently. **Position – November 2023** **No change to the position in September. The review of recovery processes continues.**				
02	We recommend that: • Seven-day lists are produced and actioned at regular interval (e.g. monthly). • Arrangements are put in place for Senior Officers to check that these are being actioned appropriately.	Medium	The 7-day list is working and being run. During 2022/23 much of the BAU recovery work slipped due to the service having to process energy and business grants (CARF). During 2023/24 all recovery work will be reviewed, and this will include a review of arrangements that have defaulted. Position – July 2023 Review is currently underway. Position – September 2023 Revenues Manager 12.09.23 A review of the Recovery processes is ongoing and as part of this we are looking at the ways in which this can be managed more efficiently. **Position – November 2023** **No change to the position in September. The review of recovery processes continues.**	Revenues Manager	31 March 2024	✘	

Property Services 2022/23
Final report issued May 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✔	Revised Deadline
03	The Council should ensure that it is aware of all records which were held outside of the Capita System, and that once the information is fully implemented within the TRAMPS system these external records are deleted.	Medium	This recommendation is noted and Officers will continue to observe all data protection and GDPR guidance with respect to data security. External records will be deleted once this stage of work is complete. A wider Council review of direct debit data transfer is being carried out. As part of this a data upload into the TRAMPS system is being considered. Position (July 2023) Data protection and GDPR guidance continues to be followed by Officers. Completion date remains on target. Position (September 2023) work is ongoing and remains on target for completion by the specified date. Once the data transfer has been fully reconciled, data from the legacy system will be fully and thoroughly deleted. **Position (November 2023)** **Final reconciliation work is nearing completion and on target for 31st December date. Once complete all legacy data will be deleted.**	Facilities Manager	31 December 2023	✘	

Business Continuity Planning 2022/23
Final report issued July 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved �× or ✓	Revised Deadline
01	In order to prevent unnecessary delays in the case of a business continuity incident all recommendations within the Disaster Recovery Plan should be actioned and followed up.	Medium	The DR Plan is separate to the BC Plan and is the responsibility of ICT to update/maintain **Position (November 2023) The recommendations have been actioned and are being followed up.**	ICT Service Delivery Manager	30 November 2023	✓	
02	An agreed plan for regular Business Continuity training should be scheduled to ensure all staff with business continuity responsibilities have received all the necessary training and support to be able to fully perform their duties.	Medium	Agreed. Tabletop exercise will be undertaken in Q1 of 2024 **Position (November 2023) On target to complete by March 2024.**	Emergency Planning & Risk Manager	31 March 2024	✗	
04	The Council should ensure that a full review of the Business Continuity Plan is completed by March 2023.	Medium	Implementation has been delayed so that the SCPs will align with new Council structure and new post of EP & Risk Officer filled. **Position (November 2023) On target to complete by March 2024.**	Emergency Planning & Risk Manager	31 March 2024	✗	

Fixed Asset Register
Final report issued July 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved �× or ✓	Revised Deadline
01	We recommend that procedures are put in place by the finance service, which make clear the information to be provided regarding the acquisition and disposal of assets in order to ensure that accurate finance records can be created and maintained.	Low	We will issue updated guidance about the information to be recorded on Purchase Orders to coincide with he roll-out of upgraded Finance System. Pro-forma returns to be issued to capital budget holders, to be completed with support	Chief Accountant	31 October 2023 31 December 2023	✗	31 December 2023

Fixed Asset Register

Final report issued July 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
			from Finance Business Partners, specifying information to be provided regarding additions and disposals. **Position – November 2023** **Initial review of capital additions and disposals will be conducted in January 2024, ahead of interim audit. Pro-forma returns to be created in December 2023.**				
02	We recommend that the Fixed Asset Register includes as a minimum the following information related to valuations: • Indication of whether asset is in scope for revaluation • Date of Last Valuation • Date of Next Valuation Valuation Methodology	Low	We note the recommendation and will ensure that the recommended fields are included in the final Fixed Asset Registers for 2020/21 and subsequent years. **Position – November 2023** **The fixed asset register spreadsheet redesign is complete and the required fields have been captured.**	Chief Accountant	30 November 2023	✓	

CIL Spend

Final report issued June 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✘ or ✓	Revised Deadline
01	We recommend that the policy (Governance Report) is updated to outline the method of submitting CIL applications, e.g. to the CIL inbox. This should be communicated across the Council. Where applications are received directly to an individual officer, a	Low	We can update the Governance report to specify applications are sent to the dedicated CIL Inbox Should emails be received directly by the CIL Officer we will ensure they are forwarded to the dedicated inbox and the sender notified of the correct email address for future correspondence.	CIL Officer	31 August 2023	✘	

CIL Spend
Final report issued June 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✖ or ✓	Revised Deadline
	reminder should be sent back to the applicant detailing the correct method for submitting applications. In order to retain audit trails, the CIL Officer should forward all applications to the CIL inbox.		We do not feel it would be good practice to refuse and ask the sender to re submit. **Position (November 2023)** **With effect of November 2023 the CIL Inbox is being used for all correspondence. Until now this has caused problems because the CIL Inbox wasn't working correctly (you couldn't send or forward emails from this destination). The governance Report has not been updated yet.**				

Payroll 2022/23
Final report issued July 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✖ or ✓	Revised Deadline
01	We recommend that managers are reminded to inform HR if any starter information changes, including start date.	Low	On this occasion, the manager of the service area agreed an earlier start date with the employee, after the contract had been sent out but without informing HR. This resulted in an underpayment that was rectified and the right date entered onto the iTrent system. HR will remind managers that HR need to be informed if an earlier or later start date is subsequently agreed.	HR Operations Lead.	Implemented	✓	Implemented
02	We recommend that officers should annotate the starter form to confirm that it has been input by one officer and checked by a different officer.	Low	The Payroll preview forms are reviewed by the first and second officer and MHR are annotated to note changes to payroll in the month and to review any discrepancies. Cross checking, and annotation, is therefore undertaken at pay preview as well as at the	n/a	Implemented	✓	Implemented

			time of inputting and discrepancies are picked up before final sign off. Payments cannot be made until all relevant information is obtained and inputted.				
03	We recommend that all additional payments are reviewed to ensure that an end date is included. This should be for the period the additional payment is required (e.g. six months). Furthermore, approvals for additional payments should be received before the extra duties or additional work is undertaken. Full explanation of the reasons for the additional payment should be recorded and retained on file.	Medium	These occasions relate to instances where backpay has been applied, i.e. the officer has already been undertaking the duties and managers have agreed the earlier commencement date for the duties and payment to be applied. HR are already ensuring that end dates (where applicable) are included on all forms and that explanations for the additional payment is recorded and retained. However, it is not always possible to ensure approval for the additional duties is received prior to the duties being carried out, especially when managers agree that a backpay situation has occurred. In all situations of additional payment, HR are already ensuring no payment is made until there is approval.	HR Operations Lead.	Implemented	✓	
04	We recommend that the Council ensure that all claims are submitted online and authorised prior to the payment period commencing and employees are reminded of the necessity to do so.	Low	It is not possible to ensure that all overtime claims are submitted online. There is a significant workforce at the Depot that do not have access to iTrent to input their overtime claims and this must be done as a manual exercise. A manual claim would also need to be made in cases where overtime has been approved by the manager in the employee's notice period, if the overtime has taken place after the pay run has already been made for the month. There are occasions where it has been agreed between the manager and employee to undertake overtime but the claim is made after the event. It is important to note that accuracy figures obtained from MHR show a 98-100% accuracy month on month and the risk of overpayment is	HR Operations Lead	n/a	✓	Implemented

			low.				

Taxi Licensing
Final report issued June 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
01	We recommend that should a licence holder fail to renew any of their key documents within the term of their licence, that they should be contacted, and their licence suspended until they complete the renewal process.	Medium	We have a process in place whereby suspension notices are sent out by officers when document has expired. This is currently done on a weekly basis. We will look at running this process on a daily basis (officer time allowing) to ensure licenced drivers are contacted and their licence suspended. Work requires input from Senior Technical Support Officer and Customer Service Centre as the latter may be tasked with running the check on a daily basis and producing reports. **Position (November 2023)** **Suspensions letters are now created with the actual date of the suspension. Officers check the suspensions daily and send to licensees accordingly (6 November 2023)**	Lead Licensing Officer	30 April 2024	✓	Implemented
02	We recommend that the service updates their website to show the most up to date list of supporting documents needed to issue a licence.	Medium	We can confirm that the website has now been updated and the documents that are not a mandatory requirement have been removed. **Position (November 2023)** **Completed**	Lead Licensing Officer	Immediate	✓	Implemented
03	We recommend that fees should be reconciled monthly between Idox and the finance system.	Low	This had already been raised with the digital team and finance prior to the audit. Officers will continue to liaise with finance to ensure that payee details are transferred to the payment system to ensure reconciliation can be achieved. **Position (November 2023)**	Lead Licensing Officer	30 April 2024	✗	

Taxi Licensing
Final report issued June 2023

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved ✗ or ✓	Revised Deadline
			Officers are continuing to liaise with finance to ensure that payee details are transferred to the payment system to ensure reconciliation can be achieved.				
04	We recommend that the service should undertake a data cleansing exercise on an annual basis to ensure they are only keeping necessary information.	Low	We will discuss further with the relevant officer and review the retention policy. When a licence has been surrendered, we are required to keep the record if the driver has issues that could be of interest or concern to another licensing authority. **Position (November 2023)** **To be reviewed with the Data Protection Officer and potentially delete and securely dispose of all files that are not required.** **(Retain files indefinitely where there is information that should be shared with other authorities such as any enforcement action that has been taken by Three Rivers).**	Lead Licensing Officer	30 April 2024	✗	

APPENDIX 8 ASSURANCE AND RECOMMENDATION PRIORITY LEVELS

Audit Opinions	
Assurance Level	**Definition**
Assurance Reviews	
Substantial	A sound system of governance, risk management and control exist, with internal controls operating effectively and being consistently applied to support 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.
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.
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.
Not Assessed	This opinion is used in relation to consultancy or embedded assurance activities, where the nature of the work is to provide support and advice to management and is not of a sufficient depth to provide an opinion on the adequacy of governance or internal control arrangements. Recommendations will however be made where required to support system or process improvements.
Grant / Funding Certification Reviews	
Unqualified	No material matters have been identified in relation the eligibility, accounting and expenditure associated with the funding received that would cause SIAS to believe that the related funding conditions have not been met.
Qualified	Except for the matters identified within the audit report, the eligibility, accounting and expenditure associated with the funding received meets the requirements of the funding conditions.
Disclaimer Opinion	Based on the limitations indicated within the report, SIAS are unable to provide an opinion in relation to the Council's compliance with the eligibility, accounting and expenditure requirements contained within the funding conditions.
Adverse Opinion	Based on the significance of the matters included within the report, the Council have not complied with the funding conditions associated with the funding received.

Recommendation Priority Levels		
Priority Level		**Definition**
Corporate	**Critical**	Audit findings which, in the present state, represent a serious risk to the organisation as a whole, i.e. reputation, financial resources and / or compliance with regulations. Management action to implement the appropriate controls is required immediately.
Service	**High**	Audit findings indicate a serious weakness or breakdown in control environment, which, if untreated by management intervention, is highly likely to put achievement of core service objectives at risk. Remedial action is required urgently.
	Medium	Audit findings which, if not treated by appropriate management action, are likely to put achievement of some of the core service objectives at risk. Remedial action is required in a timely manner.
	Low	Audit findings indicate opportunities to implement good or best practice, which, if adopted, will enhance the control environment. The appropriate solution should be implemented as soon as is practically possible.