

Three Rivers District Council Audit Committee Progress Report 21 March 2024

Recommendation

Members are recommended to:

- Note the Internal Audit Progress Report for the period to 8 March 2024
- Approve amendments to the Audit Plan as at 8 March 2024
- Agree changes to the implementation date for 4 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)

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1. Introduction and Background

Purpose of Report

- 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 8 March 2024.
- 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 8 March 2024.

Background

- 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 30 November 2023.

2. Audit Plan Update

Delivery of Audit Plan and Key Audit Findings

- 2.1 At 8 March 2024, 88% 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 November 2023 Audit Committee.

Audit Title	Date of Issue	Assurance Level	Number and Priority of Recommendations
IT Operations	Dec '23	Reasonable	Two Medium
Safeguarding	Jan '24	Reasonable	One Medium Two Low
Watersmeet Theatre	Feb '24	Reasonable	Four Low

All Priority Audit Recommendations

- 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 8 March 2024, 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	0	1	97%
2020/21	25	24	0	1	96%
2021/22	36	35	1	0	97%
2022/23	44	41	3	0	93%
2023/24	6	2	2	2	33%

- 2.5 Since 30 November 2023 Audit Committee, extension to implementation dates have been requested by action owners for 4 recommendations as follows:
 - One from the 2019/20 Property (Rent and Lease Administration) audit, with a revised target date of 31 August 2024 (was 31 January 2024).
 - One from the 2020/21 Debtors audit, with a revised target date of 31 March 2024 (was 31 December 2023) and,
 - Two from the 2023/24 Taxi Licensing audit, with revised target dates of 28 June 2024 (was 30 April 2024).

Proposed 2023/24 Audit Plan Amendments

2.6 A grant certification was completed by the 1 March 2024 deadline in respect of the DEFRA Waste Recycling funding received by the Council. The time has been taken from the Grant Certifications allocation.

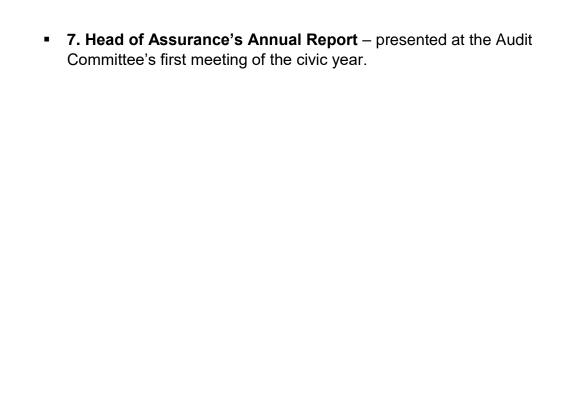
Reporting of Audit Plan Delivery Progress

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 8 March 2024	Actual to 8 March 2024
Planned Days – percentage of actual billable days against planned chargeable days completed (excludes unused contingency)	95%	90% (200 / 221 days)	88% (193.5 / 221 days)
2. Planned Projects – percentage of actual completed projects to draft report stage against planned completed projects by 31st March 2024	90%	63% (12 out of 19 projects to draft)	53% (10 out of 19 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	32% New Indicator – first measurement will be May 2024 (Currently 6/19 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.



APPENDIX 1 INTERNAL AUDIT PLAN 2023/24 - UPDATE ON POSITION AS AT 8 MARCH 2024

2023/24 SIAS Audit Plan

AUDITABLE AREA	LEVEL OF		RE	CS		AUDIT PLAN	LEAD AUDITOR	BILLABLE DAYS	STATUS/COMMENT	
AUDITABLE AREA	ASSURANCE	С	Н	M	L	DAYS	ASSIGNED	COMPLETED	OTATOO/OOMMENT	
Key Financial Systems										
Benefits (Shared Services Plan)						10	SIAS	9	In Fieldwork	
Debt Recovery (Shared Services Plan)						12	SIAS	4	In Fieldwork	
Key Financial Controls Testing (Shared Services Plan)						12	BDO	11	In Quality Review	
Main Accounting / Creditors – Control Risk Assessment (Shared Services Plan)						9	SIAS	8.5	Draft Report Issued	
Payroll (Shared Services Plan)						10	SIAS	7	In Fieldwork	
Parameters Testing (Shared Services Plan)						3	SIAS	3	Draft Report Issued	
Operational Audits										
Agency Staffing (Shared Services Plan)						12	SIAS	11.5	Draft Report Issued	
Emergency Planning						8	SIAS	5	In Fieldwork	
Performance Management / Data Quality						15	SIAS	14	In Fieldwork	
Property Services						10	BDO	9.5	Draft Report Issued	
Safeguarding	Reasonable	0	0	1	2	10	BDO	10	Final Report Issued	
Taxi Licensing	Reasonable	0	0	2	2	9	SIAS	9	Final Report Issued	
Temporary Accommodation						9	SIAS	5	In Fieldwork	

APPENDIX 1 INTERNAL AUDIT PLAN 2023/24 – UPDATE ON POSITION AS AT 8 MARCH 2024

AUDITABLE AREA	LEVEL OF		RE	CS		AUDIT PLAN	LEAD AUDITOR	BILLABLE DAYS	STATUS/COMMENT
AUDITABLE AREA	ASSURANCE	С	Н	M	L	DAYS	ASSIGNED	COMPLETED	STATUS/COMMENT
Watersmeet Theatre	Reasonable	0	0	0	4	8	SIAS	8	Final Report Issued
Contract Management									
Procurement of Play Areas / Small Outdoor Leisure Facilities						8	SIAS	7	In Fieldwork
Grant Certifications									
DEFRA Waste Recycling Grant	Unqualified	-	-	-	-	1	SIAS	1	Final Report Issued
Net Zero: Fast Followers Grant	Unqualified	-	-	-	-	2	SIAS	2	Final Report Issued
IT Audits									
IT Operations (Shared Services Plan)	Reasonable	0	0	2	0	15	BDO	15	Final Report Issued
Cyber Security (Shared Services Plan)						15	BDO	12	In Fieldwork
To Be Allocated									
Unused Contingency (Shared Services Plan)						0	N/A	0	N/A
Follow-Up Audits									
Follow-up of outstanding audit recommendations						8	N/A	8	Complete
Strategic Support									
2024/25 Audit Planning						5	N/A	5	Complete
Audit Committee						8	N/A	7.5	Through Year

APPENDIX 1 INTERNAL AUDIT PLAN 2023/24 - UPDATE ON POSITION AS AT 8 MARCH 2024

AUDITABLE AREA	LEVEL OF					AUDIT PLAN	LEAD AUDITOR	BILLABLE DAYS	STATUS/COMMENT
AUDITABLE AREA	ASSURANCE	С	Н	M	L	DAYS	ASSIGNED	COMPLETED	STATUS/COMMENT
Head of Internal Audit Opinion 2022/23						3	Yes	3	Complete
Monitoring and Client Meetings						7	Yes	6.5	Through Year
SIAS Development						3	Yes	3	Complete
2022/23 Projects Requiring Comp	letion								
2022/23 Projects Requiring Comple (5 days TRDC plan / 4 days Shared						9		9	Complete
TRDC TOTAL						119		112.5	
SHARED SERVICES TOTAL						102		81	
COMBINED TOTAL						221		193.5	

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) Final Report Issued	Agency Staffing (Shared Services Plan) Draft Report Issued	Watersmeet Theatre Final Report Issued	Debt Recovery (Shared Services Plan) In Fieldwork
	Safeguarding Final Report Issued		Taxi Licensing Final Report Issued		Performance Management / Data Quality In Fieldwork

Oct	Nov	Dec	Jan	Feb	Mar
Key Financial Controls Testing (Shared Services Plan) In Quality Review	Benefits (Shared Services Plan) In Fieldwork	Payroll (Shared Services Plan) In Fieldwork	Cyber Security (Shared services plan) In Fieldwork	DEFRA Waste Recycling Grant Final Report Issued	
Property Draft Report Issued	Temporary Accommodation In Fieldwork	Procurement of Play Areas / Small Outdoor Leisure Facilities In Fieldwork	Emergency Planning In Fieldwork		

APPENDIX 2 2023/24 AUDIT PLAN PROJECTED START DATES

Oct	Nov	Dec	Jan	Feb	Mar
Main Accounting Control Risk Assessment (Shared Services Plan) Draft Report Issued					
Net Zero: Fast Followers Grant Certification Final Report Issued					

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
	We recommend that the Council review the systems used to maintain records of Council owned properties.	Medium	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 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.	Head of Property Services / Property & Legal Services Teams	31 January 2024	* ×	31 Augu 2024

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadlin
			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. 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.				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			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 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.				
			Position – March 2024 Garage data implementation has now been completed and the system is being used for garage purposes (it should be noted that this is a new system, and issues are being addressed as they arise).				
			Mapping data is still being analysed, and is progressing well, led by the Council's GIS Officer. A GIS link is being added to the Trace system, and delays on this completion are due to TRDC-specific requirements being considered. The primary assets have been uploaded onto Trace, in the form of freehold and subsequent leasehold interests. These two systems together will form the basis for asset ownership and associated enquiries. Deed Packets will be retained.				

• • •	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 postholder of the Temporary Property Data Analyst left the Council at the end of February 2024 and at the time of writing the post is vacant, however, the closing date for internal applicants is 15 March 2024. As has been stated previously, the completion of this task is largely reliant upon available resources. The extension to the deadline is required to complete the task, based upon the dedicated resources available.									

Debtors Final report	2020/21 t 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	Recovery Team Leader, Revenues Manager and Finance.	31 August 2021	x	31 October 2021 31 October 2022 34 December 2022 30 June 2023 31 December 2023 31 March 2024

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			October 2022; it really depends on how many are on the list.			<u> </u>	Boadin
			Position – November 2022 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				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			the focus on housekeeping projects is not as high as we would like. This is progressing slowly because it needs to be managed 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. Position – March 2024 We have been unable to check many cases during Q4 due to clearing BAU work before entering the annual billing period. Dedicated resource of 46 Hrs per week (2 part-time officers) has now been allocated to the work to complete the first review of duplicate cases by the end of Q1 2024/25.				

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	O1 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. 1.9 – 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	Associate Director of ICT and Shared Services	31 March 2023	x	31 March 2024

_	ecurity 2021/22 t issued April 2022						
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			recommendation and request any growth in 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.				

_	ecurity 2021/22 t 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. Position – March 2024 1.1 The CSOC Alien Vault baselining and fine tuning has completed, and it is now running in full production. 1.2 The CSOC reports will be included within the ITSG cyber security update.				
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	Associate Director of ICT and Shared Services	31 March 2023	\(\frac{1}{2}\)	30 June 2023 30 November20 23 Resolved 31 Jan 2024

_	ecurity 2021/22 t issued April 2022						
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			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.				
			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.				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
			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 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			0.	
			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.				
			Position – March 2024: complete Qualys has been procured direct from Qualys, and has been fully operational since January. We perform daily checks and record the vulnerability position dally with a weekly summary report.				

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. Position – March 2024 Management have accepted the risk - we do this at an overall level for pre-application fees and not by individual charges as this would be too time consuming and not add value for money.	Head of Regulatory Services / DM Team Leaders	30 September 2023	\(\frac{1}{2}\)	31 March 2024

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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 upto-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 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 Position – March 2024 Process notes have been updated and a process is in place to ensure regular review.	Chief Accountant	31 August 2023	× 01 ·	30 November 2023 31 December 2023

<u> </u>	t issued April 2023			1			
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., tobacco, gambling).	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). Position – March 2024 Treasury Management Strategy Statements including ESG Policy statements have been approved by both councils (WBC 30 January 2024, TRDC 20 February 2024).	Head of Finance	30 November 2023		31 January 2024

	Tax 2022/23 t 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. March 2024 - Ongoing 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. Position – March 2024 Q1 and 2 for Council Tax being reviewed and processed. S/Debt write-offs identified during 2023/24 to date have been processed.	Revenues Manager/Data Performance Manager	31 March 2024	*	

Council Tax 2022/23 Final report issued May 2023										
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline			
			Any further write-off's identified for 203/24 will be processed after annual billing and processed before 31 March 2024.							

NDR 2022/23 Final report issued May 2023										
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or ✓	Revised Deadline			
01	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 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.	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. 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. Position – March 2024 The report is being run on a regular basis and worked on.	Revenues Manager	31 March 2024					

NDR 2022 Final report	2/23 issued May 2023						
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
02	 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. Position – November 2024 Arrangements are being checked.	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	Medium	This recommendation is noted and Officers will continue to observe all data protection and GDPR guidance with respect to data security.	Facilities Manager	31 December 2023	√				
	implemented within the TRAMPS		External records will be deleted once this stage of work is complete.							

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revise Deadlin
	tem these external records are eted.		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. Position – March 2024 All records involving tenant bank details held outside of the Trace (Property Management) System have been deleted. This will leave only documents pertaining			× Ol ∧	Deadlii

	s Continuity Planning 2022/23 t issued July 2023	3					
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or <	Revised Deadline
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. Position – March 2024 Service Continuity Plans are being reviewed and updated. A table-top exercise to validate the plans will be undertaken in summer 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. Position – March 2024 The BCP is being reviewed and updated. A table-top exercise to validate the plan will be undertaken in summer 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	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.	Chief Accountant	31 October 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			
	ensure that accurate finance records can be created and maintained.		Pro-forma returns to be issued to capital budget holders, to be completed with support from Finance Business Partners, specifying information to be provided regarding additions and disposals.		31 December 2023					
			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.							
			Position – March 2024 This action has been completed with the process incorporated into year end work. This will form part of BAU in future years.							

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 reminder should be sent back to the applicant detailing the correct method for submitting applications. In order to retain audit trails, the CIL Officer	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. We do not feel it would be good practice to refuse and ask the sender to re submit. Position – November 2023	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					
	should forward all applications to the CIL inbox.		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.									
			Position – March 2024 All relevant reports/comms have been updated'.									
			The Governance Report doesn't detail the email contact, therefore doesn't need updating.									

Taxi Lic	ensing t issued September 2023						
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
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 Officers are continuing to liaise with finance to ensure that payee details are transferred to the payment system to ensure reconciliation can be achieved. Position – March 2024 Officers are continuing to liaise with finance to ensure reconciliation.	Lead Licensing Officer	30 April 2024	×	28 June 2024
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	x	28 June 2024

Taxi Licensing Final report issued September 2023							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or ✓	Revised Deadline
			To be discussed with the Data Protection Officer within the next month and then to review process.				

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or √	Revised Deadline
01	Management should develop an overarching IT Asset Management Policy which establishes how the Council manages its IT assets in order to support the achievement of the Council's corporate objectives. The Policy should include, but not be limited to: Purpose Scope Principle (Councils' assets that are known, identified and managed with appropriate security protection in place) Inventory of Physical and Virtual assets Inventory of data assets (Data and information assets identified and an inventory of these assets is drawn up and maintained) Inventory of Software License Assets (Software and software licenses identified, and an inventory of these assets is drawn up and	Medium	We have most of the component parts listed under 'Recommendation' captured within other ICT policies. Inventory of data assets are out of scope for ICT, as data assets are the responsibility of the business. Consequently, we will not be reporting this inventory – this will be reflected within the policy. The overarching policy will be created by the stated target date. Position – March 2024 These policy changes are on target for the end of March	Service Delivery Manager	31 March 2024	×	2344111

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or √	Revised Deadline
	maintained) Ownership of Assets (Individuals, roles or teams that are assigned ownership of assets) Returning of Assets when they are no longer required Arrangements for reporting a lost or stolen IT asset The requirements for securing an IT asset Policy compliance (compliance measurement, exceptions, non compliance, continual improvement) This policy should be approved and made available to all members of staff. Further guidance on implementing asset management for good cyber security is available via this link: Asset management - NCSC.GOV.UK						
02	An over-arching policy for problem and incident management should be developed. The policy document should define: The scope of incident and problem management Guidelines for incident and problem management operations Guidelines to decide urgency level	Medium	We have most of the component parts listed under 'Recommendation' captured within other ICT policies. This policy will be completed in full for the target date of March 2024. Position – March 2024 This policy change is on target for the end of March	Service Delivery Manager	31 March 2024	×	

IT Operations 2023/24 Final report issued December 2023							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved × or ✓	Revised Deadline
	 Roles and responsibilities of incident/problem manager, team structure, RACI Matrix Service Level Agreements (SLAs) Deliverable mapping (reports and meetings) Life cycle of a problem and incident and the monitoring activities. This policy should be approved and made available to all members of staff. 						

APPENDIX 8 ASSURANCE AND RECOMMENDATION PRIORITY LEVELS

Audit (Opinions						
Assura	ance Level	Definition					
Assura	nce Reviews						
Substa	antial	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 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 achievement of objectives in the area audited.		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 risks to the achievement of objectives in the area audited.		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 provide an opinion on the adequacy of governance or internal control arrangements. Recommendations will however be made where required to see the control arrangements.		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 Certifi	cation 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		ed on the significance of the matters included within the report, the Council have not complied with the funding conditions associated with the funding received.					
Recom	nmendation Pr	iority Levels					
Priority	y 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.					
· ·	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.					
Service	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.					
Ø	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 practically possible.					