

Three Rivers District Council
Internal Audit Recommendations Log for 23 July 2019 Audit Committee

Appendix 3

Outstanding Recommendations from the 2016/17 Audit Plan

Contract Management 2016/17							
Final report issued March 2017							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>We recommend that, for each of the four contracts / suppliers selected for testing, there is an examination of the need (as applicable):</p> <p>a) For a formal contract or whether existing arrangements are sufficient for legal and contract management purposes,</p> <p>b) To locate relevant contract documentation where it may exist, and whether any resource expended on this is necessary, or</p> <p>c) To complete and sign any contract documents already in place or whether existing arrangements are sufficient for legal and contract management purposes.</p> <p>d) To re-procure the services to test the market, ensure proper process and provide full documentation with clear</p>	Medium	<p><u>Capital Constructions, Right Maintenance and Orion Heating:</u></p> <p>At present for all non-reactive works over £5K, the service is obtaining 3 quotes before the work is commissioned.</p> <p>We agree that a framework or formal agreement should be in place for planned and reactive works and this will require a detailed specification. At present the team is hugely under resourced and this will be a complicated and time consuming specification to produce hence the long target date.</p> <p>The Property Services Team work in accordance with the specification for the PPM contract agreed for each site. Any Contract would be held with Legal.</p> <p><u>Canon:</u> The Contract Manager has checked with Legal service and they are happy for the contract to continue within the current arrangements. The contract is coming up for renewal in March 2018 and the Contract Manager will ensure</p>	Head of Property	31 December 2017	*	<p>31 March 2018</p> <p>31 December 2018</p> <p>30 April 2019</p> <p>31 January 2020</p>

Contract Management 2016/17

Final report issued March 2017

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
	<p>specifications to enable formal signed contracts to be put in place.</p> <p>It is recommended that this is done in conjunction with Legal, the Procurement Manager and the relevant contract owner / manager.</p>		<p>that a signed contract with the new supplier will be maintained.</p> <p>Position (June 2017) Property Services aim to review working arrangements for all Contractors by the end of December. 3 quotes are still obtained for works under £500 to ensure a competitive price is achieved. Works over £5000 will go out to a competitive tender.</p> <p>Position (September 2017) December deadline still stands for the review.</p> <p>Position (November 2017) The team remains hugely under resourced and do not have the capacity to carry out the work to create the specification required. The Head of Property and Major projects has agreed to appoint an external company to write this for us. Revised date 31 March 2018.</p> <p>Position (February 2018) Update to be given by the Head of Property at the meeting on 20 March.</p> <p>Position (July 2018) A specification of construction works is being written and is due to be complete by the end of 2018.</p> <p>Position (September 2018) In progress.</p> <p>Position (November 2018) New Head of Property has been appointed and will progress this issue. The property Team is working with Watford BC to create a robust framework agreement to address the issues. The PPM contract will be going</p>				

Contract Management 2016/17

Final report issued March 2017

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>through the procurement process before March 2019.</p> <p>Position (March 2019) In progress</p> <p>Position (July 2019) We are currently in the process of procuring a condition survey of all our assets. There is no logic to Procure a PPM contract without this information. The reactive works are often as a result of a backlog of maintenance so we will have a better picture of our requirements once the survey has been carried out.</p>				
03	<p>We recommend that:</p> <p>a) Market testing and price benchmarking should be undertaken to confirm that rates / prices being charged are reasonable,</p> <p>b) If appropriate and contracts are put in place, consideration should be given to inclusion of a schedule of rates for the services procured by the authority from each of the suppliers.</p>	Medium	<p>As per recommendation 1 response.</p> <p>Non-reactive works over £5k are awarded after receiving three quotes. However, this will be reviewed as part of the specification.</p> <p>Position (June 2017) To be reviewed by December 2017.</p> <p>Position (September 2017) To be reviewed by December 2017.</p> <p>Position (November 2017) To be reviewed by December 2017. Please see comments at 01. This will be addressed once the specification has been written and the new contract is in place.</p> <p>Position (February 2018) Update to be given by the Head of Property at the meeting on 20 March.</p> <p>Position (July 2018) When the specification as above is complete</p>	Facilities Manager	31 December 2017	*	<p>31 March 2018</p> <p>30 April 2019</p> <p>31 January 2020</p>

Contract Management 2016/17

Final report issued March 2017

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>the works will go to procurement.</p> <p>Position (September 2018) In progress.</p> <p>Position (November 2018) Please see comments at 01 above. Once a framework agreement is in place this will address all the recommendations.</p> <p>Position (March 2019) In progress</p> <p>Position (July 2019) We are currently in the process of procuring a condition survey of all our assets. There is no logic to Procure a PPM contract without this information. The reactive works are often as a result of a backlog of maintenance so we will have a better picture of our requirements once the survey has been carried out. We will continue to obtain 3 quotes as above.</p>				

Outstanding Recommendations from the 2017/18 Audit Plan

Development Management 2017/18							
Final report issued October 2017							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that a comprehensive manual is produced that includes guidance on all four stages of the application process. The manual should be subject to review every two years, or in the event of significant changes.	Merits Attention	<p>We do have a number of existing manuals / practice notes covering different areas of the DM process. Due to the number of different types of applications we receive there are a number of different requirements so a comprehensive manual is a large document to bring together. In addition we need the support of our CSC as they are now responsible for many of the administrative / validation processes.</p> <p>I would suggest completion of a DM process manual that will cover the different parts of the DM process.</p> <p>Position (November 2017) No update for this committee as final report only recently issued.</p> <p>Position (February 2018) Added to DM E Planning projects list. Work has commenced on reviewing existing manuals in order to establish where amendments/updates required. Also beginning to establish where there are gaps in the process (i.e. where no manual currently exists to cover that part of the process).</p> <p>Position (July 2018) As above. In addition, imminent changes to groupshare folders and how we store documents will result in further assessment and utilisation of existing DM manuals.</p>	Team Leader, Development Management	1 April 2018	✓	1 October 2018 1 April 2019

Development Management 2017/18

Final report issued October 2017

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>Position (September 2018) Following appointment to two vacant planning officer posts and completion of work towards other priorities ie GDPR, Officers are now able to turn increased focus to the formulation of a procedure manual. Officers have been reviewing the existing manuals which are held by both CSC and DM and cover the varying aspects of the Development Management process from receipt to decision. A working party has been set up to progress this project further. The intention is that Officers will produce an overarching contents sheet to list all aspects of the process with reference to a corresponding manual. As part of the project Officers are also looking to review processes and move towards more electronic working and the procedure manuals will be updated to reflect this.</p> <p>Position (November 2018) In progress.</p> <p>Position (March 2019) Work is well underway on the DM Manuals and they are expected to be completed 1 April 2019. A working group was set up to progress this. A shared folder has been created where all the manuals are stored and from where they can be accessed by all officers. This ensures that all officers are using the same version. There is also an index sheet which lists all manuals, their date, version number etc which can be updated as and when changes are made. DM are continually changing our processes as we move towards more electronic working and are finding that this is meaning that manuals are having to be updated regularly and in addition, new manual</p>				

Development Management 2017/18

Final report issued October 2017

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			requirements are being identified and added. Position (July 2019) Manuals completed, however, they are constantly evolving as Officers are frequently updating processes as electronic working increases.				

Outstanding Recommendations from the 2018/19 Audit Plan

NDR 2018/19							
Final report issued December 2018							
Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>a. NNDR Officers and Inspectors are more proactive in determining the current status of leases and account issues.</p> <p>b. Quarterly inspections are completed on all empty properties.</p> <p>c. Action is taken to obtain confirmation of exact location, verification of mast being in use / not in use or de-commissioned. Upon confirmation of the current status, a decision to be taken on whether an inspection visit or change to account is appropriate.</p>	Medium	<p>To review with much more ease once 'Total Mobile' has been implemented late 2018 / early 2019, which is a new software which enables our 2 Inspectors to download and upload their visits into the Academy software.</p> <p>Position (March 2019) Awaiting implementation of Total Mobile, on target for 31 March 2019 as currently in the testing phase.</p> <p>Interim Update (29 April 2019) One training session has been delivered and as a result of some queries raised by the inspectors, a further training session has been scheduled for 17 May 2019, after which it is expected that the new software will go-live. A further update on the status of this recommendation will be provided as part of reporting to July 2019 Audit Committee.</p> <p>Position (July 2019) a. Resolved - contact being made at reminder stage when non-payment is noticed.</p> <p>b. Resolved - inspections done manually – total mobile implementation go live 15th July 2019.</p> <p>c. Resolved – letters issued to all mobile phone mast owners – accounts then</p>	Billing Team Leader	31 March 2019	✓	31 May 2019

NDR 2018/19

Final report issued December 2018

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			updated – if physically removed then reported to VO.				
02	We recommend that the Billing and Recovery Team Leaders review system reports of all accounts on hold or suppressed, completing spot checks to ensure the reasons are appropriate and where relevant, that timely action is being taken to recover the debt.	Low	<p>Bi-monthly spot checks by Billing & Recovery Team Leaders, which are documented for reasons of holds.</p> <p>Position (March 2019) Started and will be on course covering all recovery notices in sync with Council Tax by deadline date.</p> <p>Interim Update (29 April 2019) Accounts on a recovery hold are automatically brought back into the recovery / reminder cycle on expiry of the hold. These are monitored weekly and an automated report sent to officers to action.</p> <p>Position (July 2019) Implemented</p>	Billing & Recovery Team Leaders	31 March 2019	✓	
03	We recommend that an exercise be undertaken to summarise what 'aged debt' has been deemed unrecoverable and consideration be given to obtaining timely committee approval to write off these debts from previous years.	Low	<p>Agreed</p> <p>Position (March 2019) Write Offs over £3k currently being prepared for both Council's with a view to authorisation before 31 March 2019.</p> <p>Interim Update (29 April 2019) N/A – original target date 30 June 2019.</p> <p>Position (July 2019) Complete</p>	Revenues Manager	30 June 2019	✓	

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>Management should put a defined plan in place to address all existing critical and high priority vulnerabilities in a timely manner.</p> <p>There should be a defined procedure in place to resolve vulnerabilities as and when they are encountered.</p>	Medium	<p>Update existing procedures to review and remediate vulnerabilities (other than MS patches).</p> <p>If required, implement additional system e.g. SCCM to manage deployment of "other" vulnerabilities.</p> <p>Position (March 2019) Review of products such as SCCM to manage 3rd party patching across the estate.</p> <p>Position (July 2019) No update provided by management.</p>	ICT Section Head	30 November 2019	*	
02	<p>There should be a mechanism to restrict any non-complying devices to connect to the Council's IT network.</p> <p>Additionally, there should be continuous monitoring in place for all devices connected on the network to be fully antivirus protected.</p>	Medium	<p>Review current AV and VPN solution and viability to restrict devices with no up to date protection from connecting to the network fully.</p> <p>Ensure that daily reports for AV protection are monitored against asset register and this is reported to the ICT Section Head.</p> <p>Position (March 2019) Reporting mechanism from Infrastructure monitoring through to desktop services is in place. Mechanism to ensure that desktop services remediate the gaps sufficiently is currently underway.</p> <p>Replacement VPN, for all homeworking, is within scope for replacement Wide Area Network. New VPN solution will review ability to ensure that all connected devices have up to date AV.</p>	ICT Section Head	30 September 2019	*	

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			Position (July 2019) No update provided by management.				
03	<p>A training needs assessment should be performed for all members of staff that have responsibility for Cyber security so as to determine their training needs.</p> <p>Compliance should be monitored and action taken when members of staff are found to have not completed the IT Security and Data Protection training.</p>	Medium	<p>Review current skills against role to assess gap, recommending appropriate training as an outcome. Note funding will have to be approved.</p> <p>HR Manager Monitor and report against all staff who have not completed the annual requirement to refresh knowledge via the Security awareness programme.</p> <p>Position (March 2019) New Learning Management system will be ready approximately April 2019. This is led by the HR service. Once in place more accurate reporting mechanisms can be used to ensure staff are completing the required mandatory training.</p> <p>Position (July 2019) No update provided by management.</p>	ICT Section Head	<p>30 September 2019</p> <p>30 June 2019</p>	<p>*</p> <p>*</p>	

Temporary Accommodation 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>We recommend that:</p> <ul style="list-style-type: none"> Procedures are produced covering the reconciliation of Housing Benefit payments to temporary accommodation tenant records and validation checks, A suitable officer within the Housing Supply team is nominated to perform the reconciliation of Housing Benefit payments to temporary accommodation tenant records and validation checks, Management checks are performed to ensure that Housing Benefit payment schedules have been reviewed in accordance with expectations and evidence is retained and signed-off. 	Medium	<p>Procedure to be produced covering housing benefit payment dates but not possible to check the housing benefit payments until new software system in place. Housing Supply Officers will undertake this task once the above has been completed.</p> <p>Benefit schedules to be reviewed monthly to confirm dates as above but payments will not be able to be checked until new system in place as above.</p> <p>Position (March 2019) In progress</p> <p>Position (July 2019) The new software is not yet in place. We were planning on using Academy until the new Home Connections module has been developed; unfortunately using Academy is no longer an option and we are no closer to getting any estimated date on the Home Connections rent module. Melanie Talbot is the designated officer within the Housing Supply Team, who administers the debt procedure as per recommendation 4.</p>	Housing Supply Manager	31 August 2019	*	
04	<p>We fully endorse plans to produce a procedure surrounding the utilisation of Aged Debt reports for current residents of Temporary Accommodation.</p> <p>We recommend that a suitable officer within the Housing Supply team is nominated to receive Aged Debt reports and review debts relating to current residents;</p>	Medium	<p>Housing Supply Manager to develop a procedure in partnership with the Recovery Team Leader.</p> <p>These go to the Housing Supply Officers, copied into Housing Supply Manager, for action.</p> <p>Position (March 2019) Meeting held with the Recovery Team and my counterpart at Watford Borough Council to</p>	Housing Supply Manager	31 January 2019 Implemented	✓	30 April 2019

Temporary Accommodation 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
	We recommend that clarity is sought over the roles and responsibilities of the Housing Supply and Recovery teams to ensure the two-way flow of information is optimal.		<p>discuss their processes.</p> <p>I discussed the roles and responsibilities with our Recovery Team and I would be in a position to draft a procedure using the Aged Debt reports, however there are parts of Watford's processes that I would like to incorporate into our own if practical and this will take longer to complete.</p> <p>Position (July 2019) Rent Arrears procedure completed in April 2019.</p>				

Council Tax 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<p>As previously recommended in the 2017/18 Council Tax audit :</p> <p>a. Staff should be reminded to enter review and provisional end dates for Student Exemptions.</p> <p>b. An exercise should be performed to check existing Student Exemptions cases to ensure that dates are in place. This review should be undertaken annually in future.</p>	Medium	<p>Billing Team Leader on a quarterly basis.</p> <p>Position (March 2019) Billing Team Leader received training week commencing 11 February 2019, and deadline will be met whilst also reviewing on a quarterly basis.</p> <p>Interim Update (29 April 2019) All Student exemptions have been reviewed for the presence of an end date and going forward this will be completed on a quarterly basis.</p>	Billing Team Leader	31 March 2019	✓	

Council Tax 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			Position (July 2019) Implemented				
03	<p>We recommend that:</p> <p>a. inspections on second homes are completed and further action taken if found unfurnished and /or unlikely to be used as a second home.</p> <p>b. The Revenues Manager completes the review of empty properties within the identified parish boundary changes and ensures appropriate action is taken.</p> <p>c. Action is taken to determine the current status on the property Left Empty by Deceased with no charge made since 05/07/2016.</p>	Low	<p>Once Total Mobile up and running to be added to parameters. Go Live date mid-February, 2019.</p> <p>Position (March 2019) Awaiting implementation of Total Mobile, on target for 31 March 2019 as currently in the testing phase.</p> <p>Interim Update (29 April 2019) One training session has been delivered and as a result of some queries raised by the inspectors, a further training session is scheduled for 17 May 2019, after when the new software will go-live. A further update on the status of this recommendation will be provided as part of reporting to July 2019 Audit Committee.</p> <p>Position (July 2019) a. & b. Further training now provided and Total Mobile Implementation new software go live 15/7/19 will be inserted into parameters from that date onwards.</p> <p>c.Resolved – visits being made by inspectors.</p>	Billing Team Leader	31 March 2019	✓	31 May 2019
05	<p>We recommend an exercise is undertaken to summarise what 'aged debt' has been deemed irrecoverable and consideration be given to obtaining timely committee approval to write off these debts from previous years.</p>	Low	<p>The aged debt analysis is not all related to write offs, some of the outstanding monies highlighted are at different recovery enforcement stages, i.e., currently in arrangements or with our Enforcement Agents (Bailiffs) for collection, therefore reducing the amount to be proposed for write off at the date of statistical analysis.</p>	Revenues Manager	31 March 2019	✓	30 June 2019

Council Tax 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>This will also apply to the same recommendation made in the NDR Final Report issued 20 December 2018.</p> <p>Position (March 2019) Head of Service currently on sickness, however, meeting arranged for 27.03.19, hopefully sooner to discuss recommendation exercise.</p> <p>Interim Update (29 April 2019) N/A – latest target date 30 June 2019.</p> <p>Position (July 2019) Complete</p>				

CIL (Recovery and Enforcement) 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	The stop warning notice procedure should be updated to include the guidance required.	Low	<p>This procedure has now been updated to include the guidance recommended.</p> <p>Position (July 2019) Complete</p>	CIL Officer	Already implemented	✓	
02	Allocations made should be checked by an independent member of the Finance team prior to posting. Evidence of the independent check should be retained on file.	Low	The procedure has now been changed to ensure that the Assistant Finance Manager is copied into the email from the CIL Officer to the Finance Officer so that they can undertake an independent check and keep evidence of that check on file.	Assistant Finance Manager	Already implemented	✓	

CIL (Recovery and Enforcement) 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			Position (July 2019) Complete				

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>We recommend that declaration of interests forms are completed by all staff annually.</p> <p>A process for new staff should be put in place to form part of the induction programme to complete a declaration of interests form.</p>	Medium	<p>Declarations of interests will be completed by all Revs and Bens staff for 19/20.</p> <p>A prompt for this form to be signed will be added to our corporate wide new starter form so that we pick up new starters as and when required.</p> <p>Position (July 2019) No update provided by management.</p>	Head of Revenues and Benefits	30 April 2019		
02	We recommend that testing of the module is carried out to reinstate the ability to delete obsolete data.	Medium	<p>The Retention and Destruction module is currently suspended from use as it has been destroying documents incorrectly that we are still relying on to support 'live' housing benefit claims.</p> <p>We have reported this to the system supplier (Northgate) and have requested their assistance with correcting the issue so that we can start using the module again and remain GDPR compliant.</p> <p>During a meeting with Northgate on 21.03.19 we agreed we needed a Retention &</p>	Benefits Manager	31 May 2019		

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>Destruction refresher training day during which they would help us set up the system so that the system does not destroy documents we still need. We are now awaiting a date for the training to take place.</p> <p>Position (July 2019) No update provided by management.</p>				

Communications 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that the Communication Strategy 2019/22 is approved by the Policy and Resources Committee.	Low	<p>Do not agree that this should be signed off by P&R Committee. It can go to Management Board for formal sign off.</p> <p>Position (July 2019) Circulated to Management Board for consideration/sign-off.</p>	Communication s Manager	30 June 2019	✓	
02	<p>We recommend that:</p> <p>a) The Communications Office review use of social media and mobile devices guidance and subsequently it should be reviewed annually.</p> <p>b) The guidance is formally approved.</p> <p>c) The guidance is extended to Officers to ensure personal use of social media does not bring</p>	Low	<p>Agreed</p> <p>Position (July 2019) In progress</p>	Communication s Manager	31 October 2019	*	

Communications 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
	the Council into disrepute.						
03	We recommend that there is regular monitoring and reporting to Senior Management on the traditional methods of communications performance (i.e. press releases, noticeboards, website, intranet) and if shortfalls are identified corrective action is taken.	Medium	Agreed Position (July 2019) In progress	Communication s Manager	31 October 2019	*	

Main Accounting 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that the figures are moved out of the suspense account promptly.	Low	Agreed Position (July 2019) Complete	Finance Managers	30 June 2019	✓	
02	We recommend that bank reconciliations are reviewed and signed promptly by a Finance Manager after completion.	Low	Agreed Position (July 2019) Complete	Finance Managers	Immediate	✓	
03	We recommend that key account reconciliations should be completed and reviewed in accordance with the agreed timetable.	Low	Agreed Position (July 2019) Complete	Finance Managers / Assistant Finance Manager	Immediate	✓	

GDPR (PIR) 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	Data audits should be reviewed and retention schedules established for all data categories in line with guidance from IRMS.	Low	Agreed Position (July 2019) In progress	Data Protection Officer	30 September 2019	*	
02	The Council should review its overall approach to removing historic data from systems in line with its retention schedule. Responsible individuals should be allocated on a service level. Periodic monitoring and auditing exercises should be undertaken to ensure compliance.	Medium	Agreed Position (July 2019) In progress	Data Protection Officer	31 December 2019	*	
03	The Council should include the requirement to assess whether a DPIA is applicable on the PID template. Project owners should make a formal declaration as part of the project initiation process that they have considered the requirement to complete a DPIA.	Low	Agreed Position (July 2019) Completed – the PID template has been amended to include DPIA.	Data Protection Officer	31 December 2019	✓	
04	The DPO should formally report data breaches to the SIRO, FD and the CEO in all cases. The DPO should ensure that all data breaches reported to the ICO are done so within a 72-hour timeframe. This should include a continuity plan for when the DPO is out of office.	Medium	There is not an automatic requirement to report a breach to CE/DF/SIRO – this is only required if the breach warrants it. In these cases, they did not. The procedure has been amended to make this clearer. In the absence of the DPO, breaches are reported to the Principal Solicitor in Legal. Position (July 2019) Completed	Data Protection Officer	30 June 2019	✓	

GDPR (PIR) 2018/19**Final report issued June 2019**

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
05	HR should keep an up to date record of training completion rates. The DPO should review training records on a periodic basis and remind staff to book themselves on to training courses.	Low	Agreed Position (July 2019) In progress	Data Protection Officer	30 September 2019	*	