

Three Rivers District Council
Internal Audit Recommendations Log for 26 September 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.</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 PPM contract will be going 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> <p>Position (September 2019) No update received.</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>	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>Position (July 2018) When the specification as above is complete 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> <p>Position (September 2019) No update received.</p>				

Outstanding Recommendations from the 2018/19 Audit Plan

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. The following management update was received on 30 July:</p> <p>"In progress. Currently managed on a ¼ basis, using Qualys vulnerability software to assess and scan with manual remediation via patching. System will be put in place to automate where possible."</p> <p>Position (September 2019) Procedure in place for 6 monthly vulnerability checking for third party software. Remediation within 4 weeks for critical, remediation within 8 weeks for</p>	ICT Section Head	30 November 2019	✓	

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			high.				
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> <p>Position (July 2019) The following management update was received on 30 July:</p> <p>"Continuous AV monitoring in place. Daily reports reviewed to ensure all connected devices have the most recent signatures. Where the signature has not been applied this is flagged and remediated by an engineer.</p> <p>New remote working solution has AV checker within Enterprise Management module.</p> <p>Request to extend the new remote working solution roll out to December 2019. The rollout will have commenced in August 2019, but needs to be deployed to all users across all</p>	ICT Section Head	30 September 2019	<p>* Part resolved.</p> <p>Extension requested to deploy new remote working solution.</p>	31 December 2019

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>sites, in line with the deployment of new personal IT kit and Unified Communications.”</p> <p>Position (September 2019) Testing of new remote working solution, ready for deployment through Q3.</p>				
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) The following management update was received on 30 July: “Monitoring regarding mandatory training completed now in place via new Learning Management system.</p> <p>Skills gap assessment ongoing.”</p> <p>Position (September 2019) Skills gap assessment underway, being conducted by new permanent IT</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
			Infrastructure and Security Manager, who started with the Council early August. This will be completed by end of September.				

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> <p>Position (September 2019) Melanie Talbot has been training on e-</p>	Housing Supply Manager	31 August 2019	✓	

Temporary Accommodation 2018/19

Final report issued February 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>Financial. Training is being arranged Kasia Luczynska (a new Housing Supply Officer). Housing Benefit payments are manually verified against households in temporary accommodation (the above mentioned benefit schedules).</p> <p>Random management checks are completed on temporary accommodation placements, including correspondence with Revenue & Benefits.</p> <p>No further updates on the Home Connections rent module, but compensating manual control in place pending the system change.</p>				

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 management update received.</p> <p>Position – 21 August 2019</p>	Head of Revenues and Benefits	30 April 2019	*	30 Sept 2019

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>All officers with access to the Revenues and Benefits systems need to sign a declaration annually. This work is underway. We amended our internal Revs and Bens Information Security Policy in May of this year. We are now making some amendments to the declaration itself before it is sent out to all staff for signing. All signed declarations will be held on the Revs and Bens drive electronically for internal and external audit to view whenever necessary. We anticipate this work being completed by 31.08.19. The form will also form part of the new starter process being developed within Firmstep so that we capture new starts as and when.</p> <p>Position – September 2019 (Based on conversation with the Head of Revenues & Benefits) Revised declaration of interest form to be reviewed by SIAS before issue to staff.</p>				
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 & Destruction refresher training day during which they would help us set up the system so that the system does not destroy documents we</p>	Benefits Manager	31 May 2019	*	31 October 2019

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>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> <p>Position (21 August 2019) The system is designed to destroy all documents that are older than 6 years plus current. We discovered that the system was not working properly and has destroyed some documents that are still required to support live Benefit claims and therefore we need to retain. Clearly we could not allow that to continue so the system was been suspended. We have sought advice on how to fix this issue from the system provider and are awaiting their response. I have chased this today and have also now asked if it's possible to use the system in part so that we can carry on destroying old documents that we no longer require for Council Tax and Business Rates and unsuspend the Benefits part of the system once we have fixed the problem. I will escalate this issue in a week if I have not had a response.</p> <p>Position (September 2019) - Based on conversation with the Head of Revenues & Benefits Issue has now been escalated with Northgate.</p>				

Communications 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	We recommend that: a) The Communications Office review use of social media and mobile devices guidance and subsequently it should be reviewed annually. b) The guidance is formally approved. c) The guidance is extended to Officers to ensure personal use of social media does not bring the Council into disrepute.	Low	Agreed Position (July 2019) In progress Position (September 2019) This is scheduled to be completed in October 2019.	Communications Manager	31 October 2019	*	
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 Position (September 2019) This is scheduled to be completed in October 2019.	Communications Manager	31 October 2019	*	

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 Position (September 2019) 90% complete – remainder will be	Data Protection Officer	30 September 2019	*	

GDPR (PIR) 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			completed by 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 Position (September 2019) On target for completion by 31 December 2019.	Data Protection Officer	31 December 2019	*	
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 Position (September 2019) Completed – all new staff attend a GDPR awareness session and attendance records are kept.	Data Protection Officer	30 September 2019	✓	

IT Contract Management 2018/19

Final report issued July 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that the value of having KPIs and SLAs for all future contracts is considered and evidenced, to ensure proportionate monitoring is undertaken on a regular basis.	Low	The inclusion of appropriate KPIs and SLAs will be considered as part of the procurement process for all future ICT contracts. Position (September 2019) Implemented	Head of ICT	Ongoing	✓	

IT Contract Management 2018/19

Final report issued July 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	A review of retention systems should be undertaken to ensure IT contracts are held in a central location.	Low	Action will be undertaken to ensure that soft copies of all current contracts are stored in the appropriate folders on the service drives. Position (September 2019) In progress.	Head of ICT	31 March 2020	*	