

Three Rivers District Council

Internal Audit Recommendations Log for 24 September 2020 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
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>Non-reactive works over £5k are awarded after receiving three quotes. However, this will be reviewed as part of the specification.</p> <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</p>	Facilities Manager	31 December 2017	✓	<p>31 March 2018</p> <p>30 April 2019</p> <p>31 January 2020</p> <p>30 June 2020</p> <p>31 December 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>continue to obtain 3 quotes as above.</p> <p>Position (September 2019) No update received.</p> <p>Position (November 2019) We are still awaiting the procurement of the condition survey, and this will form the basis of any new contract, we will be in a better position to spec the tender for services required.</p> <p>Position (March 2020) No change to the above.</p> <p>Position (June 2020) Due to the current situation there has been no change as many of the trades are only starting to return to work. We are out to tender for the PPM works.</p> <p>Position (September 2020) The PPM procurement delayed due to COVID is now complete.</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
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>	ICT Section Head	30 September 2019	<p>*</p> <p>Part resolved.</p> <p>Extension requested to deploy new remote working solution.</p>	<p>31 December 2019</p> <p>31 January 2020</p> <p>31 May 2020</p> <p>31 December 2020</p>

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<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 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> <p>Position (November 2019) This is in progress, and a key issue/dependency resolved. Slight delay in roll out means that this is likely to completed mid-end of January 2020.</p> <p>Position (March 2020) The solution is ready to deploy. This has been tested. The deployment has been paused due to the coronavirus outbreak. Migration to a new home working solution during a period where there is a high possibility of large-scale home working required has meant a decision to pause.</p> <p>I have made a request to extend to the end of May to accommodate other business risk also, elections and revenues and benefits year end processing.</p> <p>Position (June 2020) Request made to extend the deployment to December 2020. The deployment has been delayed due to ongoing COVID work and the requirement to continue to maintain and support all Officers to work from home. Partial deployment in place, approx. 70 staff are using the new solution, but this solution is now</p>				

Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			being reviewed with reference to the likely increase on an ongoing basis of an increasing volume of remote working. Position (September 2020) Review of product undertaken. Transition to new product underway.				

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
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 still need. We are now awaiting a date for the training to take place.</p> <p>Position (July 2019)</p>	Benefits Manager	31 May 2019	*	31 October 2019 30 June 2020 30 Sept 2020

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>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> <p>Position (November 2019) No update provided by management.</p> <p>Position (March 2020) The Northgate system is currently being upgraded. The upgrade is now available in test and the live upgrade is due to take place 1st and 2nd May 2020. We will test this module of the system as part of the overall testing. If this module works, we will be able to run scripts which will 'back archive' documents that would have been due to be archived since it was</p>				

Benefits 2018/19

Final report issued April 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>discovered the system was not working properly.</p> <p>Position (June 2020) The required Northgate system upgrade was due to be live now but has been delayed as a result of COVID-19. Northgate have currently rescheduled the upgrade for 8-9 September 2020 and when this takes place, we will test the module and if this is working as expected, run the necessary scripts to archive the data that should have been deleted.</p> <p>Position (September 2020) No update received.</p>				

GDPR (PIR) 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<p>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.</p> <p>Periodic monitoring and auditing exercises should be undertaken to ensure compliance.</p>	Medium	<p>Agreed</p> <p>Position (July 2019) In progress</p> <p>Position (September 2019) On target for completion by 31 December 2019.</p> <p>Position (November 2019) On target for completion by 31 December 2019.</p>	Data Protection Officer	31 December 2019	*	<p>30 Sept 2020</p> <p>31 December 2020</p>

GDPR (PIR) 2018/19

Final report issued June 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>Position (March 2020) No update received.</p> <p>Position (June 2020) Heads of Service have been reminded to review and remove historic data from systems in line with their data retention schedules and privacy notices. The automated redaction tool for the Uniform system has not yet been implemented. An ongoing monitoring and audit of personal data held by each department are being set up.</p> <p>Position (September 2020) This is progressing, but it is unlikely to be completed by the end of September due to other priorities. A revised deadline date of 31 December 2020 is requested.</p>				

Agency Staffing 2018/19

Final report issued December 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that an HR led workforce strategy for the use of agency staff is formally established, jointly agreed and implemented by both Councils. It should cover the financial, administration and overall control benefits of using providers such as Comensura as well as providing clarity about the circumstances when it is appropriate /	Medium	<p>Work has commenced on producing a guide for managers in both Watford and Three Rivers regarding compliance with agency worker regulations and IR 35. This guide once agreed will be provided to Audit for information.</p> <p>Position (March 2020) The guidelines have been drafted and will be available on the intranet shortly. The action will</p>	Head of HR and OD	1 April 2020	✓	31 July 2020

Agency Staffing 2018/19

Final report issued December 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
	necessary to consider alternative suppliers. It should also include clearly defined responsibilities for overseeing and monitoring the overall use of agency staff and for carrying out periodic reviews of agency staff.		<p>be completed in accordance with the original timescale.</p> <p>Position (June 2020) The situation is that the guide has been written however, unfortunately with covid-19 it has not been shared with the appropriate management teams or adopted as yet. We do however, have it planned to go to CMT at Three Rivers on 30 June and are sharing with Unison for their input. I would anticipate the guide being available and approved by end of July.</p> <p>Position (September 2020) The guide was approved 28 July 2020 and is live on the Intranet.</p>				
02	<p>We recommend that appropriate corporate policies and procedures are established, formally agreed and then implemented in both Councils regarding the use of agency staff.</p> <p>This should provide clarity about the engagement process and the use of Comensura or alternative suppliers. Also, it should provide confirmation of the key roles and responsibilities of the local Service Areas, the shared HR Service, and for financial administration, including appropriate coding, in relation to the use of agency staff.</p>	Medium	<p>As above, we believe the guide will cover the requirements for both councils.</p> <p>Position (March 2020) The guidelines have been drafted and will be available on the intranet shortly. The action will be completed in accordance with the original timescale.</p> <p>Position (June 2020) The situation is that the guide has been written however, unfortunately with covid-19 it has not been shared with the appropriate management teams or adopted as yet. We do however, have it planned to go to CMT at Three Rivers on 30 June and are sharing with Unison for their input. I would anticipate the guide being available and approved by end of July.</p> <p>Position (September 2020) The guide was approved on 28 July 2020</p>	Head of HR and OD	1 April 2020	✓	31 July 2020

Agency Staffing 2018/19

Final report issued December 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			and is live on the Intranet.				

Appendix 5

Outstanding Recommendations from the 2019/20 Audit Plan

Development Management (Enforcement) 2019/20

Final report issued September 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that the Council review the Enforcement Plan at the earliest opportunity.	Low	<p>Agreed.</p> <p>Position (November 2019) In progress</p> <p>Position (March 2020) The work is in-progress; however, the updated enforcement plan is required to go to the Infrastructure, Housing and Economic Development Committee to be agreed by Members. The meeting on 17th March is too soon and therefore this will go to the meeting due on 23rd June.</p> <p>Position (June 2020) None taken to date. Delay down to coronavirus. Committee Meeting now identified for 22nd September.</p> <p>Position (September 2020) Review underway however due to Coronavirus and other prioritises there will be a further delay. Committee meeting now</p>	Team Leader (Projects and Compliance)	31 May 2020 (formal adoption of new plan following on-going review)	*	<p>30 June 2020</p> <p>30 Sept 2020</p> <p>30 November 2020</p>

Development Management (Enforcement) 2019/20

Final report issued September 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			identified for 17 th November.				

Property (Rent and Lease Administration) 2019/20

Final report issued October 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that the Council review the systems used to maintain records of Council owned properties.	Medium	<p>Agreed</p> <p>Position (November 2019) In progress</p> <p>Position (March 2020) The matter of a new property system is very much still "in progress". For info, the second and third recommendations below, naturally fall out of the first one, and can only be addressed in parallel. A 'project board' does meet periodically, a budget has been secured at the last Full Council (25/02), a preferred system has been identified, and the preliminary work needed prior to a procurement (confirmation of specification, selection of framework to use, resource demand for implementation, etc) is underway.</p> <p>Position (June 2020) Following the departure of staff previously overseeing this task the situation is being reviewed. It is evident that a specification is needed to determine the precise systems</p>	Principal Property and Asset Manager	30 April 2021	*	

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
			<p>required and how they link property to finance etc this specification is being finalised. The system is also being procured jointly with Watford Borough Council to cover shared services so a coordination exercise will be needed. Thereafter a suitable system will be procured. The new timescales for full implementation is by mid-2021. In the meantime, the existing systems are being kept up to date and as reliable as possible.</p> <p>Position (September 2020) In progress.</p>				
02	We recommend that the Council explore what reports are available from the systems in place to better inform property activity.	Medium	<p>Agreed</p> <p>Position (November 2019) In progress</p> <p>Position (March 2020) See recommendation 1</p> <p>Position (June 2020) This issue will be resolved as part of the new system procurement above. More important is to link property information better to finance information so that the collection of rents and arrears can be examined live and accurately.</p> <p>Position (September 2020) In progress.</p>	Principal Property and Asset Manager	30 April 2021	*	
03	We recommend that the Council draw up a brief procedural guidance, with templates if necessary, to ensure the completeness of the property records held.	Low	<p>Agreed</p> <p>Position (November 2019) In progress</p> <p>Position (March 2020) See recommendation 1</p>	Principal Property and Asset Manager	30 April 2021	*	

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
			<p>Position (June 2020) To be addressed as part of the new system procurement.</p> <p>Position (September 2020) In progress.</p>				

Financial Account Reconciliations 2019/20

Final report issued December 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<p>We recommend that all identified reasons for differences are carried forward and clearly shown in the next periods explained comments column where unresolved or action is pending.</p> <p>In addition, a date be detailed in the reason / comment column to provide a time trail leading back to the original date the difference occurred.</p>	Low	<p>A review of financial procedures is currently underway that will ensure a consistent approach is taken.</p> <p>Position (March 2020) We are currently working on the financial regulations and we are on target to implement a consistent approach for all reconciliations.</p> <p>Position (June 2020) Due to the impact of Covid-19 this has been delayed and will be reported back in September.</p> <p>Position (September 2020) The action is complete now. We have a reconciliation tracker which monitors all the financial account reconciliations and is</p>	Section Head - Financial Accounting and Technical	31 March 2020	✓	30 Sept 2020

Financial Account Reconciliations 2019/20

Final report issued December 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			reported monthly to the Head of Finance.				

Cyber Security 2019/20

Final report issued January 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<u>Updated Recommendation</u> Furthermore, there should be requirement to have a process to perform a full scan on the end point devices and servers on a regular basis.	Medium	Agreed. Position (March 2020) No action as yet. Position (June 2020) No action as yet. Position (September 2020) In progress, trialling of a monthly user end point full scan and a monthly server endpoint full scan. Will be resolved by 30 September.	Head of ICT	30 September 2020	*	
03	<u>Updated Recommendation</u> The Councils should determine an appropriate percentage of staff that should complete the cyber security training – best practice would be 100%. Performance against this target should be monitored and reported.	Medium	Agreed. Position (March 2020) In progress. Security awareness training in the process of being updated prior to being circulated to all staff for completion. Position (June 2020) Security training updated, but yet to be confirmed to all staff. Delayed due to COVID related activities. Position (September 2020)	Head of ICT	30 April 2020	*	31 December 2020

Cyber Security 2019/20

Final report issued January 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			Cyber Security training module reminder to all staff as a mandatory module will be emailed through September 2020.				

Contract Management 2019/20

Final report issued March 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>1. We recommend a contract management risk is included in the service risk registers or Strategic Risk Register, with controls identified which can be applied to all contracts.</p> <p>2. For significant contracts (high monetary value or critical services) a dedicated risk register should be created outlining the key risks of the contract and how they are to be managed.</p> <p>3. Risks should be regularly reviewed, by contract managers, as part of contract monitoring.</p>	Medium	<p>TRDC do not consider this to be a strategic risk. We will ask for a corporate risk to be included in the relevant service operation risk register.</p> <p>Position (June 2020) In the process of adding the risks to relevant operational risk registers. It is aimed to be completed by September 2020.</p> <p>Position (September 2020) Contract Management risks have been added to relevant risk registers in the 2020/21 Service Plans.</p>	Data Protection Officer to ensure these are included in the Service operation Risk Register.	30 April 2020	✓	30 Sept 2020

Taxi Licensing 2019/20

Final report issued April 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	We recommend that correct documents are received to meet the licence requirements. Reminders should be diarised for any of the documents that need to be updated, to maintain proper evidence.	High	<p>Reminder letters are in the process of being implemented which will chase those licences/documentation which are expiring.</p> <p>Officers to discuss that correct documents are required by CSC.</p> <p>Officers to ensure that Uniform records are updated when site visits are undertaken to Operators and all consultee responses are uploaded onto EDMS.</p> <p>Position (June 2020) All being implemented apart from reminder letters. This process is still outstanding and has been delayed due to Coronavirus.</p> <p>Position (September 2020) This process is still outstanding and has been delayed due to Coronavirus. Aim to set up reminder letters by revised deadline.</p>	Team Leader, Projects and Compliance	30 September 2020	*	31 October 2020
05	We recommend that as best practice, the service should consider sending licence renewal reminders to the operators as well as drivers to encourage the renewal of licences on time.	Low	<p>Officers are already working towards sending reminders out via Uniform.</p> <p>Officers recognise that this is important and testing is underway. There have been a number of issues with the system which has prevented this from going ahead quicker.</p> <p>Position (June 2020) As above, this process has been started but is yet to be completed and has been delayed due to Coronavirus.</p> <p>Position (September 2020) As above.</p>	Team Leader, Projects and Compliance	30 April 2020	*	31 October 2020

Community Strategy 2019/20

Final report issued May 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	Review, update and approve terms of reference for Board and partnership theme groups to bring them up to date and schedule an annual review of all terms of reference.	Medium	<p>Review of the Families First Partnership Board will be scheduled by Oct 2020 due to the priority of Covid-19 recovery planning.</p> <p>Review of the Three Rivers 11-19 Strategy Group Terms of reference to be scheduled for the autumn term meeting.</p> <p>Position (June 2020) The LSP Board will consider the revised terms of reference on 23 June 2020 Board meeting. The first meeting of each year will be used to review the terms of reference as part of the revised workplan.</p> <p>Position (September 2020) No update received.</p>	Head of Community Partnerships	30 November 2020	<p>*</p> <p>*</p>	
03	Management to update risk registers with review dates, actions and action plan completion dates.	Medium	<p>Risk registers to be reviewed and dated by the end of December 2020 as priority at present is for the development of Covid-19 Action Plans – which will need to have their own risks identified.</p> <p>Position (June 2020) Strategic risk register has been reviewed for Covid-19. Service Risk Registers have been reviewed for Covid-19. LSP Board risk register will be developed following completion of the Covid-19 Impact Assessment, and recovery action plan.</p> <p>Position (September 2020) No update received.</p>	Head of Community Partnerships	31 August 2020	*	

Risk Management 2019/20

Final report issued June 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	<p>An independent review of the Operational/Business Unit risk registers should be undertaken periodically, by the Risk Management Group, to ensure that they include;</p> <ul style="list-style-type: none"> • Clear risk descriptions which include the risk hazard, the cause and the consequence • Controls which clearly describe how the control mitigates the risk • An assigned risk owner for each risk • Risk reviews are appropriately completed and dated confirming any changes • Risk scores are correct in accordance with risk management strategy. 	Medium	<p>The RMG will review all risk registers over the summer and advise Heads of Service where inaccuracies or gaps need to be addressed.</p> <p>Position (June 2020) In progress</p> <p>Position (September 2020) All risk registers have been reviewed and updated.</p>	Emergency Planning and Risk Manager	30 September 2020	✓	
02	<p>Management should present the Policy & Resources Committee with the strategic risk register for review on a six-monthly basis.</p> <p>The Audit Committee should also be presented with the strategic risk register (or extracts) at each meeting.</p> <p>Reviews of the strategic risk register could comprise of a complete review of the risk register, or alternatively reports from relevant committees with a summary of any changes and confirmation of cases where reviews are outstanding.</p>	Medium	<p>Audit Committee are not responsible for reviewing the Strategic Risk Register.</p> <p>Review of the Strategic Risk Register has been added to the work programme for the Policy and Resources Committee.</p> <p>Position (June 2020) In progress</p> <p>Position (September 2020) A full review of the strategic risks is being undertaken and will be reported to the November meeting of the Policy and Resources Committee.</p>	Emergency Planning and Risk Manager	30 September 2020		

Risk Management 2019/20

Final report issued June 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
03	<p>When Committee reports include risk sections, heads of service should ensure that any associated risks are incorporated into service risk registers.</p> <p>Heads of Service should complete quarterly reviews within departmental meetings as an open forum for discussion to ensure reviews are accurate, and this will also allow for new risks to be identified.</p>	Medium	<p>Agreed – Heads of Service to be reminded to update their registers after committee decisions are made and to undertake quarterly reviews.</p> <p>Position (June 2020) In progress</p> <p>Position (September 2020) Risk registers are regularly reviewed and updated.</p>	Emergency Planning and Risk Manager / Heads of Service	30 September 2020	✓	
04	<p>The Council should ensure that new starters are identified and that those in key risk management positions are also identified and appropriate training provided.</p> <p>Refresher risk management training should be provided on an annual basis to those in key positions.</p>	Medium	<p>Agreed - A new e-learning package will be prepared and made available for all staff.</p> <p>Position (June 2020) In progress</p> <p>Position (September 2020) In progress.</p>	Emergency Planning and Risk Manager	31 December 2020		