

**Three Rivers District Council**  
**Internal Audit Recommendations Log for 11 November 2020 Audit Committee**

**Appendix 3**

**Outstanding Recommendations from the 2018/19 Audit Plan**

<b>Cyber Security 2018/19</b>							
<b>Final report issued January 2019</b>							
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</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>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 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</p>				

## Cyber Security 2018/19

Final report issued January 2019

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p>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 being reviewed with reference to the likely increase on an ongoing basis of an increasing volume of remote working.</p> <p>Position (September 2020) Review of product undertaken. Transition to new product underway.</p> <p><b>Position (October 2020)</b> <b>An extension was given in July 2020 to December 2020. The July update confirmed that the reason for this extended delay was as a result of COVID. Transitioning to a new homeworking solution (which is required to meet this audit recommendation) with the current reliance on homeworking takes additional planning and effort to ensure that we don't impact service delivery across the Councils. In parallel to this ICT have had to review the remote working solutions altogether as homeworking for all officers is not only an essential part of technology landscape, but levels of the resilience requirements etc have increased. This is not something we had planned for when the solutions were originally procured (pre-covid), therefore a review was required, which has been taking place.</b></p>				

## 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. 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 &amp; 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> <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</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>escalate this issue in a week if I have not had a response.</p> <p>Position (September 2019) 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 1<sup>st</sup> and 2<sup>nd</sup> 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 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> <p><b>Position (October 2020) No update provided.</b></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> <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> <p><b>Position (October 2020)</b> <b>No update provided.</b></p>	Data Protection Officer	31 December 2019	*	30 Sept 2020  31 December 2020

## 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 17<sup>th</sup> March is too soon and therefore this will go to the meeting due on 23<sup>rd</sup> June.</p> <p>Position (June 2020) None taken to date. Delay down to coronavirus. Committee Meeting now identified for 22<sup>nd</sup> September.</p> <p>Position (September 2020) Review underway however due to Coronavirus and other prioritises there will be a further delay. Committee meeting now identified for 17<sup>th</sup> November.</p> <p><b>Position (October 2020)</b> <b>As above.</b></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>

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

## Cyber Security 2019/20

Final report issued January 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<p><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.</p>	Medium	<p>Agreed.</p> <p>Position (March 2020) No action as yet.</p> <p>Position (June 2020) No action as yet.</p> <p>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.</p> <p><b>Position (October 2020) Completed</b></p>	Head of ICT	30 September 2020	✓	
03	<p><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.</p>	Medium	<p>Agreed.</p> <p>Position (March 2020) In progress. Security awareness training in the process of being updated prior to being circulated to all staff for completion.</p> <p>Position (June 2020) Security training updated, but yet to be confirmed to all staff. Delayed due to COVID related activities.</p>	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
			<p>Position (September 2020) Cyber Security training module reminder to all staff as a mandatory module will be emailed through September 2020.</p> <p><b>Position (October 2020) In progress.</b></p>				

## 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	*	<b>30 November 2020</b>

## Taxi Licensing 2019/20

Final report issued April 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<p><b>Position (October 2020)</b>                      The setting up of the new procedures requires access to the office to ensure the process works correctly. It also requires external IT assistance from the software provider. Given the availability of only one part time Council Officer who has the ability to create/amend the appropriate IT software (Uniform), the new process has been delayed due to other priorities to keep services running during the outbreak. Work has commenced and implementation is expected later in November.</p>				
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> <p><b>Position (October 2020)</b>                      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. 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> <p><b>Position (October 2020) No update provided.</b></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	*	

## Community Strategy 2019/20

Final report issued May 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
			<b>Position (October 2020) No update provided.</b>				

## Risk Management 2019/20

Final report issued June 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
02	<p>Management should present the Policy &amp; 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. 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> <p><b>Position (October 2020) As above.</b></p>	Emergency Planning and Risk Manager	30 September 2020	*	<b>30 November 2020</b>
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</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		

## Risk Management 2019/20

Final report issued June 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
	basis to those in key positions.		<b>Position (October 2020)</b> <b>No update provided.</b>				

## Benefits 2019/20

Final report issued October 2020

Ref No.	Recommendation	Priority	Action to Date	Responsibility	Deadline	Resolved * or ✓	Revised Deadline
01	We recommend that Benefits Assessors are reminded to ensure that confirmatory evidence is obtained to support the exact type of Pensioner Credit and that when 'Searchlight' (DWP System Records) are checked these are reviewed to show the exact type of benefit the claimant is receiving, i.e. Pensioner Credit Guaranteed or Savings. In respect to the case identified details have been reported to the Quality Assurance Team for remedial action.	Low	All Benefit Officers have been reminded to ensure that a spotlight check for a Pension Credit claim is captured and confirms which type of Pension Credit is in payment. The Quality Team when checking new claims where PC is in payment will check that the spotlight check does show which type of PC is in payment or otherwise that we have received the necessary evidence from another source.  <b>Position (October 2020)</b> <b>Implemented</b>	Benefits Manager	Implemented	✓	
02	We recommend that an exercise should be undertaken to identify historical cases that have outstanding attachment of benefit and Searchlight checks done to identify any that are in receipt of benefits and other actions explored, as appropriate.	Medium	We are currently reviewing all debts that do not have an arrangement in place. Where there is a state benefit in place that we might be able to attach to, we will send the request to the DWP and enter a diary date to review. The Recovery Team Leader and Revenues Manager will monitor that diary dates are reviewed and completed.  <b>Position (October 2020)</b> <b>As above.</b>	Revenues Manager	31 March 2021		

