

# Cotswold District Council

## Report of Internal Audit Activity

April 2021

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At the conclusion of audit assignment work each review is awarded a “Control Assurance Definition”;

- No
- Limited
- Reasonable
- Substantial

#### Audit Framework Definitions

#### Control Assurance Definitions

<b>No</b>	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.
<b>Limited</b>	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
<b>Reasonable</b>	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
<b>Substantial</b>	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Non-Opinion – In addition to our opinion based work we will provide consultancy services. The “advice” offered by Internal Audit in its consultancy role may include risk analysis and evaluation, developing potential solutions to problems and providing controls assurance. Consultancy services from Internal Audit offer management the added benefit of being delivered by people with a good understanding of the overall risk, control and governance concerns and priorities of the organisation.

Recommendations are prioritised from 1 to 3 on how important they are to the service/area audited. These are not necessarily how important they are to the organisation at a corporate level.

Each audit covers key risks. For each audit a risk assessment is undertaken whereby with management risks for the review are assessed at the Corporate inherent level (the risk of exposure with no controls in place) and then once the audit is complete the Auditors assessment of the risk exposure at Corporate level after the control environment has been tested. All assessments are made against the risk appetite agreed by the SWAP Management Board.

## Audit Framework Definitions

### Categorisation of Recommendations

When making recommendations to Management it is important that they know how important the recommendation is to their service. There should be a clear distinction between how we evaluate the risks identified for the service but scored at a corporate level and the priority assigned to the recommendation. No timeframes have been applied to each Priority as implementation will depend on several factors; however, the definitions imply the importance.

	Categorisation of Recommendations
<b>Priority 1</b>	Findings that are fundamental to the integrity of the service's business processes and require the immediate attention of management.
<b>Priority 2</b>	Important findings that need to be resolved by management
<b>Priority 3</b>	Finding that requires attention.

### Definitions of Risk

Risk	Reporting Implications
<b>High</b>	Issues that we consider need to be brought to the attention of both senior management and the Audit Committee.
<b>Medium</b>	Issues which should be addressed by management in their areas of responsibility.
<b>Low</b>	Issues of a minor nature or best practice where some improvement can be made.

# Audit Plan Progress

# APPENDIX B

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2019/20 Audits in Draft / In Progress at Annual Opinion									
Key Financial Control	Accounts Receivable		Final Report	Reasonable	4		1	3	Reported in October
Follow-Up	S106 Agreements and Funds								Support to the Project Team. Audit review included in 2021/22 audit plan
Follow-Up	Procurement		Final Report	N/A	-				Reported in October
Follow-Up	Procurement and Contract Management		Final Report	N/A	-				Reported in October
Operational	Asset Management and Commercial / Investment Property		Position Statement	N/A					See Appendix C
Advisory	Use of Volunteers		Final Report	N/A	-				Reported in October
Advisory	Grants		Final Report	N/A	-				See Appendix C
ICT	Business Continuity		Final Report	Reasonable	2		2		See Appendix C
ICT	Incident Management		Final Report	Reasonable	4		2	2	Reported in January

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
2020/21 Audit Plan									
Operational	Business Grant Funding		Complete	N/A	-				Support to the Council in respect of Data Input
Advisory	Leisure Funding		Complete	N/A	-				Support to the Council in respect of the Leisure Funding request by the Service Provider
Advisory	CFU Policies		Complete	N/A	-				Reviewing policies held by CFU and advising of changes to legislation
Operational	Continuous Assurance Reports		On-Going						Accounts Payable, Accounts Receivable, Payroll
Support	Business Grant Funding (Part 2)			N/A	-				Head of IA seconded to Council to support processing of Mandatory and Discretionary Business Grants from November onwards
Support	Co-Ordination Team – Flooding			N/A					Support to the Co-Ordination Team during flooding issues in Cirencester
Key Financial Control	Revenues and Benefits								
	• Council Tax and National Non-Domestic Rates		Final Report	Limited	2		1	1	See Appendix C
	• Housing and Council Tax Benefits		Final Report	Reasonable	1		1		See Appendix C
Key Financial Control	Core Financials								



Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
	• Accounts Payable		In Progress						
	• Accounts Receivable								
	• Main Accounting		Draft Report						
	• Payroll		In Progress						
	• Treasury Management and Bank Reconciliation		Final Report	Substantial	1			1	Reported in January
Key Financial Control	Systems Administration		Draft Report						
Key Financial Control	Human Resources		In Progress						
Key Financial Control	Other Support Service provided by Publica • Health and Safety (Of Staff)		Position Statement	N/A					Reported in January
ICT	Cyber Security		Final Report	N/A	5			5	Reported in January
ICT	Use of Anti-Malware Software		In Progress						
ICT	Automatic Back-Up of System Data		In Progress						
Governance	Risk Management		In Progress						
Governance	Performance Management								
Governance	Governance of Programmes and Projects								

Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Operational	Post Payment Assurance – Small Business Grants		Draft Report						
Operational	Authority's Response to Covid-19		In Progress						
Operational	Publica Transformation Benefits Realisation								
Operational	The Delivery of Services by Publica								
Operational	Inclusivity and Diversity								
Operational	Publica Support Costs Recharge Process & Internal Control Process for Contract Variations (NEW)		Audit Deferred						
Advisory	Implementation of the New Revenues and Benefits System		In Progress						Support to the Project Team
Follow-Up	Follow-Ups of Recommendations made in Substantial and Reasonable Audits		On Going						
Follow-Up	Follow-Up of Control Weaknesses identified by the Counter Fraud Unit		On Going						
Follow-Up	Procurement		On Going						Further Follow-Up required
Follow-Up	Procurement and Contract Management		On Going						Further Follow-Up required
Grant Certification	Disabled Facilities Grants		Complete	N/A					



Audit Type	Audit Area	Quarter	Status	Opinion	No of Rec	Priority			Comments
						1	2	3	
Grant Certification	Income Compensation Scheme (NEW)								
Other Audit Involvement	Working with the Counter Fraud Unit		On Going						
Other Audit Involvement	Management of the IA Function and Client Support		On Going						
Other Audit Involvement	Contingency – Provision for New Work based on emerging risks								

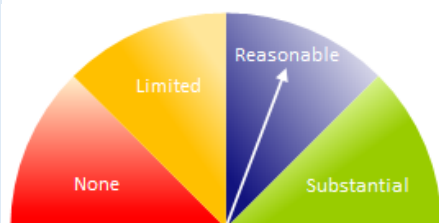
The following information provides a brief summary of each audit review finalised since the last Committee update

## ICT Business Continuity – Final Report – March 2021

### Audit Objective

The objective of the audit is to ensure that the organisation has planned for and can maintain an agreed level of business continuity to priority services in the event of a critical ICT incident.

### Assurance Opinion



There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.

### Agreed Actions

Priority	Number
Priority 1	0
Priority 2	2
Priority 3	0
Total	2

### Risks Reviewed

Over reliance on the ICT service to maintain Corporate Business Continuity resulting in a loss of organisation wide service continuity in the event of a disruption to ICT services.

### Assessment

Medium

### Key Findings



Current Service Level Business Continuity Plan (BCP) templates lack sufficient information and detail of the procedures to be followed in the event of a prolonged ICT outage. The Publica Business Continuity Steering Group have recognised that the current template is not suitable, and a new template is currently under development.



At a high level, the ICT BCP details the critical applications required to continue critical ICT services. However, it is notable that Business Applications are grouped together within a timeframe of recovery that may not meet Publica and the Council's needs.



Publica have an overarching Corporate Business Continuity Plan, and have created a Steering Group, comprised of Group Managers, together with an Emergency Planning and Business Continuity Specialist to oversee BCM strategy moving forwards. Whilst the events of 2020 have prevented a certain amount of progress being made in this area, they have also presented themselves as a live test of business continuity. When a certain amount of normality returns, the Steering Group should complete a full, lessons learned exercise in order to further improve responses in the future.

### Audit Scope

The scope of the audit included a review of:

- Critical ICT services have been identified and fully documented within Business Continuity Plans.
- Expectations set by the ICT service to the wider organisation in terms of resources and availability of applications is documented and understood.
- Reliance on third party service providers has been identified and documented in the ICT plan.
- Major services have short term recovery strategies which reference the complete loss of the ICT service.
- Critical ICT incidents affecting services are recorded and formally investigated and lessons learned documented.
- The ICT Service Continuity Plan is tested periodically and kept up to date.

### Further Information

Business Continuity planning is essential to an organisations ability to continue to deliver vital services should an event occur to disrupt normal processing. Organisations should identify critical services, complete Business Impact Assessments, and devise plans to respond when an incident occurs.

Publica are actively taking steps to develop and improve the Business Continuity arrangements across the organisation with the creation of a Business Continuity Management Steering Group, consisting of Group Managers, including a Business Continuity and Emergency Planning Manager.

An audit of the ICT BackUp and Recovery controls is planned to be undertaken this year and will be able to provide further assurance of the preparedness of the organisations to be able to recover from incidents of varying size and disruption.

## Asset Management and Commercial Property – Position Statement – December 2020

### **Audit Objective & Scope**

To ensure the Council's activities for its property and land assets are co-ordinated to realise value (release capital and maximise income) whilst supporting its strategic objectives.

Testing included an assessment of sample properties and land assets at each of the partner Councils based on risks to achieving the above objective.

*N.B. Audit fieldwork for this review was carried out between October 2019 and February 2020. All findings reflect the position of Asset Management and Commercial Investments at that time. Due to the pandemic the audit was put on hold. Draft versions of this report were issued to the service area in May / June 2020 and work had commenced to address some of the findings.*

### **Key Findings**

#### **Cotswold District Council**

- The Asset Management Plan (AMP) should be reviewed, updated and approved by Cabinet to ensure compliance with Financial Rules. An AMP ensures that corporate priorities are built into asset management activities and helps to prioritise activities based on the annual funding available. Best practice advocates strategic review of the asset portfolio; an annual report detailing performance would aid this review.
- We identified inconsistencies in the application of rent deposits as a procedure isn't available. Any decisions made are based on officer knowledge and could result in challenge to the authority or potential errors in raising charges. We would suggest that a document is drafted (similar to the Commercial Rents Guidance and Procedure from a partner Council) to ensure consistency and reduce potential challenge.
- An external review was commissioned for the Council's investment properties in March 2019 and recommendations made for each of the properties reviewed. The Business Manager (Assets) advised that the Council's property and land assets are revalued in line with the terms of a lease or on renewal/expiry of a lease. If periodic reviews are undertaken, it would allow the Council to assess alternative usage (if appropriate) and/or possible income generation for the assets in use. Given the current climate it is essential that the best possible benefit can be realised. If the AMP included the frequency of proactive activity based on the type of asset it would help to achieve this aim.
- During 2018/19 reconciliation between subscription invoices and lease charging information was suspended due to resourcing issues, this was reinstated in April 2019.

### **Conclusion**

Due to the pandemic, normal working arrangements were impacted, and officers were required to undertake business continuity/recovery works. This resulted in the audit not being able to be completed. The Estates Manager advised that improvements have been made in some key areas since the fieldwork was undertaken.

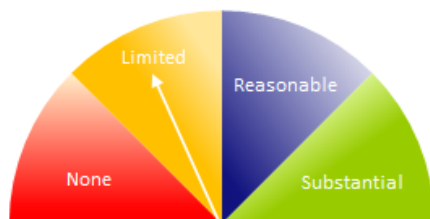
We have therefore not provided an assurance opinion at this stage and have planned to undertake a follow-up review in the 2021/22 audit plan to provide the assurances that the partner Councils and senior management seek.

## Council Tax and National Non-Domestic Rates – Final Report – January 2021

### Audit Objective

To ensure key financial system controls are operating effectively for Council Tax and Business Rates, and that opportunities for error, fraud or corruption are minimised.

### Assurance Opinion



Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.

### Number of Actions

Priority	Number
Priority 1	0
Priority 2	1
Priority 3	1
Total	2

### Risks Reviewed

The Council does not collect all Council Tax and Business Rates due as a result of errors, omissions or fraud leading to financial loss or reputational damage.

### Assessment

Medium

### Key Findings



Three former Publica employees had active Northgate user ID's, their access has since been removed. Four shared Northgate Accounts with enquiry access are active, these are used by the External Audit provider, Counter Fraud Team and Revenues Officers, when they do not use their individual ID's which allows them to update the CDC Revenues systems.



The officer responsible for monitoring suppressed accounts also has system permissions to add suppressions. Segregation of duties should be introduced to protect both the officer and the council from potential allegations of wrongdoing.



4 key control recommendations from previous audit reviews relating to suspense account monitoring, the Service level Business Continuity Plan and Council Tax and NNDR bills being reconciled to the actual bills posted are still outstanding. 1 relating to closed Council Tax accounts in credit has been partially implemented. These agreed actions should be implemented to address the weaknesses identified and ensure controls are operating effectively going forwards.



The reconciliations of the Council Tax and NNDR systems to the General Ledger supplied for both Councils balanced.

### Audit Scope

A high-level review of key controls, financial reconciliations, variance reporting, system access and generic accounts was undertaken in October 2020. A follow up of recommendations made in last year's audit has also been undertaken.

Due to officer involvement with the project to implement Civica across all Publica sites at the time of audit work, it was agreed Data Analytics would not add value to this year's review, and sample testing would not be undertaken.

Evidence was supplied by, and discussions were held with the Business Manager Operational Services, the Revenues Technical Lead / Homeless Prevention Officer, the Revenues Technical Lead, and a Business Partner Accountant.

### Next Steps

Two new actions have been agreed with management. All actions including those from previous audit reviews are due to be implemented by 31<sup>st</sup> March 2021.

## Housing Benefits and Council Tax Support – Final Report – January 2021

### Audit Objective

To ensure key financial system controls are operating effectively for Housing Benefits and Council Tax Support, and that opportunities for error, fraud or corruption are minimised.

### Assurance Opinion



There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.

### Number of Actions

Priority	Number
Priority 1	0
Priority 2	1
Priority 3	0
Total	1

### Risks Reviewed

Housing Benefits and Council Tax Support claims are not processed correctly, completely and on a timely basis as a result of errors, omissions or fraud leading to financial loss or reputational damage to the Council.

### Assessment

**Medium**

### Key Findings



Reconciliation of Housing Benefit to the General Ledger has not been undertaken for CDC during this financial year because of the increased workload due to Covid-19. This is non-compliance with the Financial Rules.



Two former Publica employees had active Northgate user ID's and access to the CDC Benefit systems, this access has since been removed. A recommendation has been made in this year's Council Tax and NNDR audit report to check access rights on a periodic basis



Four generic Northgate user ID's with enquiry access are currently active. These are used by the External Audit provider, Counter Fraud Team and Benefits Officers during year end processes, when they do not use their individual ID's which allows them to update the CDC Benefit systems.



The reconciliation of the Council Tax system to the Housing Benefit and Council Tax Support Systems supplied for all three Councils balanced.



Customers are no longer able to provide benefits evidence in person due to Council Office closure but can still make an appointment with a Benefits Officer if required. We were advised the process itself is unchanged since before the pandemic.

### Audit Scope

A high-level review of key controls, financial reconciliations, variance reporting, system access and the benefits evidence process since Covid-19 restrictions were introduced was undertaken in October 2020. There are no recommendations to follow up from last year's audit.

Due to officer involvement with the project to implement Civica across all Publica sites at the time of audit work, it was agreed Data Analytics would not add value to this year's review, and sample testing would not be undertaken.

Evidence was supplied by, and discussions were held with the Business Manager Operational Services, the Revenues Technical Lead / Homeless Prevention Officer, the Revenues Technical Lead, Benefits Technical Lead and a Business Partner Accountant.

### Next Steps

One action has been agreed with management, which was due to be implemented by January 2021, this will be followed up in due course.



## Grants – Advisory Report – November 2020

### Executive Summary and conclusion

The Council are undertaking a review of their current Community Grants processes. To inform this review, SWAP Internal Audit Services were requested to complete a benchmarking exercise, rather than the planned audit review, to compare the current Cotswold District Council (CDC) Community Grants processes and criteria to other councils' processes and criteria.

A sample of local authority policies were collated from their respective websites to identify current themes and ideas which could highlight any areas of improvement CDC could consider incorporating into their processes. Items of note were selected from the CDC application process / form and criteria to baseline against other councils' respective documentation (notes on these can be seen in the accompanying spreadsheet).

Information relating to CDC processes was provided by Council officers responsible for managing the processes, however the benchmarking data is based solely on the publicly available information from the other Councils' websites.

Overall, no standard or consistent formats, guidelines, processes or criteria were observed across the sample of Councils. We found that councils offer a number of different schemes and the provision of grants in relation to the schemes are based on the 'priorities' of each council.

Our audit identified some areas that the Council may wish to consider:

- Review of information presentation. New rules regarding accessibility come into effect from September 2020 and details of this can be found on the Publica intranet. Current documents should be reviewed to ensure they meet these requirements, and consideration could be given to publishing information in different formats to prevent potential compatibility issues or format limitations.
- Consideration could be given to presenting more information, on the schemes available, on the webpages, which could include a short video presentation, however there is no precedent for this. Consideration could be given to also separating the guidance documents from the application form and presenting them in a different, more colourful and visually appealing format. One of the Councils have online applications, however the guidance provided stands out as being visually appealing rather than being fully text based as most council's provide. One of the other councils, in our sample, provides a nicely displayed guidance document.
- The inclusion of a Data Protection and Privacy statement on the application form, or guidance, should be discussed with the Data Protection Officer, to ensure obligations, required under Data Protection Act with regards to the collection and processing of personal information, are being met.
- Although an acknowledgement of council funding involvement is stipulated, not many councils provide added information on the promotion of each project, however one of the councils provide a detailed guidance document to help with project promotion and expectations regarding acknowledgement of the council.

Generally, no common themes, processes or criteria were identified that are not already undertaken by Grants officers at CDC.

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
Council Tax and NNDR 44610	2	The Revenues Technical Lead reviews suppressed accounts but is also able to add suppressions to accounts. Ensuring there is separation of duties reduces the risk of accounts being suppressed and not checked.	To ensure there is separation of duties, the Revenues Technical Lead should have his suppression permissions removed.	Mar 2021	
Housing Benefits and Council Tax Support 44592	2	At the time of audit work the Business Partner Accountant advised that due to the increased workload brought about by Covid-19, reconciliation of Housing Benefit has not been undertaken so far during this financial year.	It was confirmed that it will be undertaken as soon as workloads allow.	Jan 2021	
ICT Business Continuity 44816	2	The current Service Level Business Continuity Plans (BCP) lack sufficient information and detail of the steps to taken by teams should the critical functions identified within them suffer a serious disruption by the extended loss of the ICT service due to and for example a significant ransomware attack.	New templates will be devised, to include: <ul style="list-style-type: none"> <li>- A comprehensive Business Impact Analysis identifying the critical functions.</li> <li>- Documented detailed action plans to consider the extended loss of ICT service.</li> </ul>	May 2021	

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
ICT Business Continuity 44817	2	It is important the ICT service have a full understanding of each Service Area and the wider organisation's business requirements to ensure a structured recovery in the event of a disruption to service. Business applications have been grouped together and documented in the ICT BCP plans, however there are some inconsistencies between the criticality of business area's tolerable downtime, and the potential restoration of those services by the ICT team. There are also inconsistencies within the plan itself whereby it is stated Business Applications will be restored within 48 hours, but then also state recovery will be within 1 week to 10 days.	<ol style="list-style-type: none"> <li>1. Consider a permanent ICT representative in the BCM Steering Group.</li> <li>2. Work on the Asset Inventory has already commenced and is to be completed.</li> <li>3. Determine recovery timescales from the BIA, update new BCP template and DR Plans. (The Template is set to be introduced in May 21.)</li> </ol>	<p>Dec 2021</p> <p>May 2021</p>	BCM Steering Group will include ICT officials.
ICT Incident Management 44560	2	As part of the Information Security framework of policies, the Incident Management Policy is out of date and requires review, update, and approval. Update of the policies has been impacted by the Covid-19 pandemic, and the need for a review is recognised by the ICT Audit & Compliance Manager.	ICT Audit and Compliance Manager will review and update all ICT Security Policies following the completion of the Cyber Security audit report. The aim to have drafted policies by April 2021 for circulation to all network users.	Apr 2021	
ICT Incident Management 44562	2	There is a lack of detailed standard operating procedural documentation. Incident management investigation is currently based on a high-level process flow-chart denoted in the Incident Management policy; however, this lacks detailed information on how to conduct an incident investigation.	We have now commenced with documenting our cyber incident and investigation managements procedures	On Going	

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
Payroll 43699	2	We recommend that all new starters are subject to a BPSS (or similar) check regardless of the role to which they are being recruited. This will ensure that consistent checks of right to work, employment history and basic criminal record checks are carried out on all employees.	A piece of work has been carried out to re-write the pre-employment check process. The HR and Recruitment Teams are also working towards the implementation of an Application Tracking System (ATS), subject to approval at Publica and the Councils, which would help to mitigate the risks identified. The ATS would not allow for progression in the recruitment and on-boarding process without specific criteria being fulfilled first (e.g. obtaining references, ID checks etc).	Sep 2020	Will be followed-up during the annual audit
Health and Safety – Fire Risk Assessments 43147	2	We recommend that officers should ensure all remedial actions identified in fire risk assessments are completed using a risk-based approach.	These remedial action requirements are in progress and will be completed in accordance with the noted time scale.	Sep 2020	<p>The Buildings Services Officer has supplied IA an updated version of the Cotswold District Council schedule. Actions have been updated and any outstanding/ongoing have been given a target date of April 2021. Further follow-up will be required.</p> <p>The Building Services Officer provided a schedule of works for Cotswold District Council in line with the Fire Risk Assessments. The schedule had been updated since the initial audit, but most (if not all) actions had a target date of September 2020. Covid-19 has put restrictions on the actions that can be carried out so work has focussed on actions that could be carried out safely - e.g. review and further assessment of outstanding actions and update of schedules.</p>
Procurement and Contract Management 41127	2	We recommend that assurance is sought from Publica that contracts held and managed on behalf of the Council are monitored and managed effectively.	Publica colleagues have been requested to respond to the recommendations made in the report issued. Assurance has been requested that contract management and monitoring is undertaken.	Sep 2020	Publica have included 'Get commissioning right' as one of the four priorities in their 2020-22 Business Plan, including Procurement in the supporting Action Plan (Strategic Action 8). Good progress has so far been made towards outstanding recommendations from both the Procurement and the Procurement and Contract Management audits.

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
Accounts Receivable 43752	2	Duplicate subscriptions should be reviewed, and appropriate corrections made. Any duplicate payments should be returned to the debtor.	All subscriptions will be corrected where applicable. Will discuss with team to ensure that prior to setting up new subscriptions a search for existing subscriptions is performed. If any queries arise the AR officer will refer to the service area for clarification. Responsible Officer – AR Team Leader	Aug 2020	Will be followed-up during the annual audit
Section 106 Agreements and Funds 40365	2	To ensure the Council can be held to account in managing the delivery of S106 obligations, the progress of S106 Agreements should be regularly reported at an appropriate Committee and on the Council's website.	Once the Government has produced the data specification and collection tools, these will be used to produce reports for Members and published on the Council's website. There is currently no known date for the publication of these tools, therefore a prolonged timescale has been proposed to implement this action.	Mar 2020	This recommendation will be addressed with the implementation of Exacom (system purchased to monitor S106s and CIL) IA are part of the project team and will continue to ensure actioning of the recommendation We have made provision for an audit of S106s in the 2021/22 audit plan, this finding will be included in the scope of the audit.  Recommendation Closed.

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
Systems Admin 41204	2	We recommend a principal Identity and Access Management process detailing requirements for 'Joiners, Movers and Leavers' is developed and documented and that complies with the requirements set out in the Information Security and Access Control Policy. The overarching process should apply to and embrace all systems that may not be included within the standard ICT team scope and should be available for all employees to view and follow. System administrators should then document or update local processes and procedures that should be in alignment with the overarching policy and process requirements. and documented on a quarterly basis as per the requirements of the Risk Management Policy	Our team ICT Administrators are now updating and documenting our Access Management system process for joiners, Movers and Leavers. A change control process will be introduced that will document significant changes to the ICT infrastructure which will also align to our ICT User Policies and guidance.	Mar 2020	Flowcharts have been produced for the starters / leavers / variation processes. The ICT Audit and Compliance Manager will refresh the ICT Policies following the completion of the Cyber Security audit report. He is aiming to have drafted policies by March 2020 for circulation / consultation at CGG and JMT.  Further follow-up has been included in the 2020/21 audit plan  Revised implementation date to 31/12/20 due to Covid-19
Procurement 41030	2	To ensure there is an audit trail to support all contract payments, the introduction of "No PO, no payment" policy should be considered to assist with the efficient monitoring of contract spend.	This will be considered	Dec 2019	We were advised that no decision has been made yet regarding the implementation of a 'no PO, no pay' policy across the Publica Councils. Proposals will need to be submitted by Publica for consideration by Cabinet at each Council. This recommendation will require further follow-up in 2020/21.
Procurement 41002	2	All Officers should be informed during Procurement Process training of the following to ensure when applicable; • Procurement are consulted on all contracts over £5,000 so all approved contracts are entered onto the Contract Register, and waiver details can be accurately recorded when appropriate	Agreed	Dec 2019	This is included in the Procurement and Commissioning User Guide and accompanying mandatory training for Publica, CDC, WODC and FoDDC staff.  Recommendation Closed.



## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action(s)	Due Date	Update April 2021
Procurement 41323	2	To ensure all transactions are raised and approved appropriately and in line with the current organisational structure, all requisitioning and approval permissions should be reviewed in BWO.	Following the recent organisation changes, the approvals permissions will be reviewed to ensure they are aligned with new roles and implemented accordingly on the ABW system.	Dec 2019	We were advised: •A review of ABW requisitioner and approver roles is currently in progress. •Together with the finance team, the ABW support team aim to review all clients over the coming months. • Work on CDC approvers is still underway. This recommendation will require further follow-up in 2020/21.
Procurement 41181	2	A copy of the approved contract must be held on In-Tend for all contracts over £5,000, as well as the quotes used during the tendering process, to demonstrate best value and ensure there is a complete central record.	Agreed, subject to a review of the contract value requirements.	Dec 2019	Any documentation that is present on In-Tend will relate to the formation of a contract, or a contract already in place. All other documentation relating to the tendering process will be kept on Google Drive.  A sample of contracts was taken from the current contracts database, and we were able to confirm that they were all on In-Tend.  Recommendation Closed.
Procurement 41029	2	Budget Holders should regularly undertake monitoring of expected contract spend to actual contract spend as part of contract monitoring, to ensure contracts are managed in accordance with strategy, and inform Procurement of any changes to contract values to ensure the values recorded on the Contract Register are correct.	Agreed	Dec 2019	No evidence has been provided of actions carried out by responsible officers to support implementation of this recommendation at the time of follow-up. As part of the 2020/21 Audit Plan, an audit of the Management and Monitoring Contracts will be carried out. The scope of this audit will include budget monitoring arrangements in relation to contract spend and will therefore inform the follow-up of this recommendation. Revised implementation date to 31/12/20 due to Covid-19

## Summary of all Agreed Actions from April 2019 and Progress against them

CDC ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/19)	0	1	6	7
Open and current	0	0	0	0
Open and Outstanding/Overdue Subject to follow up	0	0	0	0
Open with date extended	0	1	2	3
Closed	0	0	4	4

PUB ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/19)	0	12	11	23
Open and current	0	5	5	10
Open and Outstanding/Overdue Subject to follow up	0	1	2	3
Open with date extended	0	4	2	6
Closed	0	2	2	4

