

**Internal Audit Recommendation Tracker (Overdue)**

**Appendix B**

Last Updated: 16 November 2018

Audit Year (Date report issued)	Rec Ref	Original Recommendation	Priority	Original Managers Response	Responsible Officer/ Head of Service	Agreed Imp Date	Revised Imp Date(s)	Status Update from Management	Status
<p><b>Human Resources - Recruitment</b>  (September 2015)</p>	<p>2</p>	<p>Recruitment training should be provided to recruiting managers and evidenced.</p>	<p>Low</p>	<p>Agreed. Online training programme to be created on Wisenet and sent out to new managers with recruiting responsibilities. Certificate will be issued at the end of the course and a copy will be placed in individual files.</p>	<p>HR Manager /Head of Governance</p>	<p>31/03/16</p>	<p><del>31/12/16</del> <del>30/06/17</del> <del>30/09/17</del> <del>31/03/18</del> <del>30/04/18</del> <del>30/09/18</del> 30/11/18</p>	<p><b>Jun/Nov16:</b> Due to staff shortages meeting has been postponed until Sept 16 to discuss and prepare online training programme via Wisenet. Estimate completion date Dec 16. Existing Wisenet training course 'Preventing illegal Working' will also be reviewed. In the meantime, the HR Advisor meets, on an ongoing basis, with recruiting managers to give one to one advice and guidance on the recruitment process.</p> <p><b>Feb 17:</b> Trial of online training within HR complete, following which a few edits are to be completed. Thereafter identify small trial of few new managers to be undertaken in February 2017.</p> <p><b>May 17:</b> Trial has been completed. The recruitment module is ready. The staff member who completes e-learning also has other responsibilities, the main one being Payroll. Due to the additional Election this year and unanticipated changes to the e learning platform (systems upgrade which is due in June/July) this is not ready to launch.</p> <p><b>July 17:</b> Wisenet requires a systems upgrade as the existing module is no longer supported, therefore training cannot be provided at the moment. The upgrade will be undertaken by CLS (External Consultants), in liaison with ICT. Awaiting response from CLS.</p> <p><b>Oct 17:</b> Still awaiting response from CLS regarding timescales for the Wisenet systems upgrade. This is unlikely to be achieved until early 2018.</p>	<p>Overdue</p>

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								<p><b>Feb 18:</b> CLS have updated parts of the system and it was anticipated this would progress further in quarter 4. Ilearn (new name for Wisenet) has been impacted by CLS elements still outstanding and unexpected and unavoidable staff absence.</p> <p><b>May 18:</b> HR focus has been to deliver e-learning training for GDPR to all staff prior to 25<sup>th</sup> May. The upgrade required for the e-learning IT system has been completed. Mandatory training courses are under review to ensure compliance with GDPR requirements. Following review the training programme will be published for employees to complete.</p> <p><b>Oct 18:</b> The course has been finalised and has been through pilot with management support in October, some slight changes have been recommended. Due to pre booked annual leave and competing commitments within the HR team this is expected to be finalised in November 2018 for internal publication</p>	
<p><b>External Data Transfers</b> December 2016</p>	<p>2b</p>	<p>Management should ensure that adequate data sharing protocols/ information sharing agreements are in place for Veolia and Kier Harlow. (HTS)</p>	<p>Medium</p>	<p>Agreed. Veolia – Environment and Licensing Manager/ Head of Place</p>	<p>Veolia – Environment and Licensing Manager/ Head of Place</p>	<p>31/12/16</p>	<p><del>01/07/17</del> <del>31/12/17</del> <del>30/07/18</del> 31/01/19</p>	<p><b>May 17:</b> The Environment &amp; Licensing Manager has drafted a data sharing agreement between Veolia and Harlow Council, setting out the principles for data sharing in connection with the waste and recycling contract, to ensure compliance with the Data Protection Act. The draft agreement has been approved by the Assistant Solicitor and sent to Veolia. Awaiting response.</p> <p><b>July 17:</b> No response has yet been</p>	<p>Overdue</p>

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								<p>received from Veolia. This may be because the Veolia management team are engaged in bidding for the replacement contract. Nonetheless the Environment &amp; Licensing Manager has written to the General Manager for domestic contracts at Veolia requesting an update on the proposed data sharing agreement. Data Sharing protocols/agreements form part of the current waste service discharged by Veolia and are included in the new tender process to select a new waste management partner in early 2018</p> <p><b>Oct 17:</b> Veolia has responded with several queries and requests for additional information. Negotiations are in progress and the agreement should be completed by December.</p> <p><b>Feb 18:</b> Veolia has been reminded they are required to complete the data sharing agreement for GDPR compliance purposes. The contract specification for the new waste contract includes a requirement for data sharing protocols/agreements between the Council and the successful contractor.</p> <p><b>May 18:</b> The main focus has been to prepare for the procurement of the waste and recycling contract, including agreeing the extension of the existing waste contract with Veolia. The data sharing agreement has therefore not been signed. Veolia will be reminded of the requirement to sign the data sharing agreement to ensure</p>	

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								<p>compliance with GDPR. In mitigation, limited personal data is shared with the waste contractor. On target for completion in July.</p> <p><b>Oct 18:</b> The Environment and Licensing Manager has been in correspondence with the newly appointed Managing Director for Municipal waste at Veolia, regarding this. The draft sharing protocol is agreed but certain specifics such as the identities of officers within Veolia must be identified. Veolia will contact the Environment and Licensing Manager in the near future with the identity of their team members who will be responsible for completing this.</p> <p>The Council has made completion of and adherence to the Data Sharing Protocol, a contract term, and so the contract cannot be signed off until this is in place. Therefore, this is expected to be completed by January 2019.</p>	
				Agreed. Kier Harlow/(HTS) - Assistant Solicitor/ Head of Governance	(HTS) - Assistant Solicitor/ Head of Governance	01/02/17	<del>25/05/18</del> 31/01/19	<p><b>May 2017:</b> All information sharing processes and policies are being reviewed to ensure compliance with the GDPR.</p> <p><b>July 17:</b> Internal and external resource has been allocated to this work, which has commenced.</p> <p><b>Oct 17:</b> HTS has been informed they will need to appoint a DPO and have privacy notices etc. in place. A meeting is to be arranged to meet with HTS to go through what they data they receive and what they do with it, to determine if</p>	Overdue

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								<p>they are data controllers [which they will be in some incidents] or data processors.</p> <p><b>Feb 18:</b> Data sharing mapping has commenced for HTS and terms and conditions for Data Sharing agreements for both HTS and Veolia have been drafted.</p> <p><b>May 18:</b> There is a data sharing protocol on the infonet which is to be used as a template for all contracts that process personal data. These will be published both on the HDC web and the WEISF portal to show compliance with GDPR.</p> <p><b>Oct 18:</b> A draft variation deed for the Services Agreement between the Council and HTS is now in final form and can be signed containing all GDPR Information Sharing obligations between the Parties. In addition, draft protocols for information governance have been provided to the HTS Contract Administrator.</p>	
<p><b>Playhouse (2017/18) October 2017</b></p>	<p>5</p>	<p>Liaise directly with the insurance officer to ensure the lists of contents are updated and an accurate valuation is reached.</p>	<p>Medium</p>	<p>A meeting will be arranged with the Insurance and Risk Manager and identify who will be best placed to carry out the content review due to the time involved.</p> <p>Carry out review of 2011 inventory and</p>	<p>Technical and Projects Manager</p> <p>Community, Leisure and Cultural Services Manager</p>	<p>30/11/17</p> <p>01/04/18</p>	<p><del>30/12/18</del> 31/01/19</p>	<p><b>Feb 18:</b> Meeting with the Council's Insurance Manager originally scheduled for February is to be rearranged for March 18.</p> <p><b>May 18:</b> Meeting with insurance has taken place and works are ongoing and likely to be continued up to end of 2018.</p> <p><b>Oct 18:</b> Working with insurance to obtain quotes for this work to be completed.</p>	<p>Overdue</p>

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				update accordingly.					
<b>Creditors (2017/18) March 2018</b>	3	The Finance Team should review the live system delegated authorisation / approval limits against the manually documented limits, to check consistency between the two records. The system should be updated where appropriate and evidenced. If temporary increases are required to meet operational needs, the live system should revert back to the original (Signatories Listing) figure once the increase is no longer required.	Medium	1. The two sets of records are being standardised during the process of updating the Authorised Signatory List.	Systems Team Leader	30/06/18	31/12/18	<b>Oct 18:</b> The two sets of records are being standardised and will be complete by December 2018.  Temporary increases are managed by the Agresso “substitute” system and are date limited.	Overdue

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<b>Harlow Trading Services (Property and Environment) Limited Contract Payment Mechanisms (2017/18)</b>  <b>May 2018</b>	1.1	The performance indicators within the contract should be reviewed to ensure the Council's requirements for improved efficiencies, incentivised performance and value for money are met.	High	A Board will be created to drive this forward, supported by a series of Task and Finish groups.  Governance framework to be in place by 30 September 2018.	Managing Director (as project sponsor)	30/09/18	31/12/18	<b>Oct 18:</b> Due to resourcing constraints JPRM will be used as the vehicle to drive the reviews of KPIs. Task and finish groups established as appropriate through the Shared Operational Performance group.  A review of the datasheets for the Major & Minor KPIs is underway via the Contract Administrator as part of the process to transfer HTS data to the Council's InPhase system. Expected completion: JFPR Q2 2018/19.	Overdue
	1.2	The review of KPIs should be identified and managed as a formal project with appropriate documentation and timescales for each KPI. The review of individual KPIs should be prioritised on a risk basis.					31/03/19	<b>Oct 18:</b> In addition to paragraph 2 above, an in-depth review of the indicators for each service area has commenced with the Environmental Services as part of the Council's Environmental Improvement Project. Environmental Services KPIs to have been reviewed by end of financial year. JPRM to discuss and schedule the other service areas following the lessons learnt from the activities within the Environmental stream.	Overdue
	1.3	As part of the review, consideration should be given on paying HTS in arrears as well as invoking penalty clauses where performance is below expectations.					31/03/20	<b>Oct 18:</b> The payment mechanism to be included in the Best Value Review of the contract as per Cabinet report of September 2015.	Overdue

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	1.4	A sample of indicators used for performance reporting should be selected periodically by the Council for HTS to provide assurance and verify the integrity of information used to report performance.					30/11/18	<b>Oct 18:</b> A report for approval by SMB to be received in November setting out programme for indicator sampling for the remainder of initial 5 year contract period (up to 2021/22)	Overdue
<b>Harlow Trading Services (Property and Environment) Limited Contract Payment Mechanisms (2017/18)</b>  <b>May 2018</b>	2.1	An overarching improvement plan should be created for the Council to collate the reviews of HTS services into one document and enable the Council to monitor and evidence progress that is being made.	Medium	This will form part of the governance framework described above.	Managing Director	30/09/18	31/03/19	<b>Oct 18:</b> JPRM to agree the overarching mechanism to collect, monitor and evidence the reviews of HTS Services – target date to be set, may feed into scope of best value review, otherwise to be completed by March 2019.	Overdue
	2.2	The introduction of an overall improvement plan could also be used to hold HTS to account if targets/remedial action are not addressed in line with timescales agreed by both parties.					31/03/19	<b>Oct 18:</b> The mechanism agreed in 2.1 to include an ‘improvement plan’ which holds HTS to account if targets and remedial actions are not met.	Overdue



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<b>Absence Management (2017/18) June 2018</b>	1	The Sickness Absence Management Policy should be updated to require HR to be notified by line managers, on the first day of absence, when a staff member is absent due to illness. However, this audit recognises that implementation of this recommendation may be hampered by system limitations. In the interim period, Managers should be reminded that Self Certifications, Fit Notes, and Return to Work forms must be submitted to HR, as appropriate, for all periods of sickness absence.	Medium	The Sickness Absence Management Policy will be reviewed to address the recommendation, including suggested system improvements to aid implementation. In the meantime all staff will be reminded of the correct recording and notification of all periods of sickness. This will be through both the Senior Management Board and Third Tier Manager's meetings. In addition an item in WIS will reinforce the requirement.	HR Manager / Interim Head of Governance	30/09/18	30/11/18	<b>Oct 18:</b> The Governance Team plan has set the review of the policy to end of November 2018, thereafter there is the necessity to engage with SMB and the recognised trade union as part of HC commitments, Once the policy has been finalised and agreed relevant implementation processes and where applicable training, following thereafter.	Overdue
<b>Absence Management (2017/18) June 2018</b>	3	All absence management policies should be subject to regular, planned reviews. Review dates should be recorded on the documents to help ensure that the required reviews are	Low	As part of the Sickness Absence Management Policy review, all related absence management policies will be reviewed to reflect current law and good practice. This	HR Manager	30/09/18	31/03/19	<b>Oct 18:</b> Policy review commitments have been made for 2018/19. Where links are made with other policies they will be updated accordingly and subject to competing commitments.	Overdue

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		completed and they continue to meet operational needs. In addition, consideration should be given to developing an Annual Leave Policy covering entitlement, booking, approval etc.		includes formalising an Annual Leave Policy as part of the suite of documents.					