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External Data Transfers December 2016	2b	Management should ensure that adequate data sharing protocols/ information sharing agreements are in place for Veolia and Kier Harlow. (HTS)	Medium	Agreed. Kier Harlow/(HTS) - Assistant Solicitor/ Head of Governance	(HTS) - Assistant Solicitor/ Head of Governance	01/02/17	~~25/05/18~~ ~~31/01/19~~ ~~31/03/19~~ ~~30/11/19~~ 29/02/20	**May 19:** Concluded operational discussions to get a better understanding of the data shared between HDC & HTS. The information will now be used to populate the ROPA and the Information Sharing Protocol by the end of May 2019. **Oct 19:** Due to the work required for the Best Value Review of HTS (P&E) Ltd), work on the ROPA had to ceased. The work has now resumed. It is anticipated that the Data Sharing Protocol will be completed by the end of November 2019 **Feb 20:** The Relationship and Commissioning Manager has drafted a Data Sharing Protocol and ROPA for HTS to use. The HTS Data Protection Officer is working on this and it is anticipated that the work will be completed at the end of February.	Overdue
Purchase Cards (2018/19) October 2018	3.1	Policies are required to clarify the Council's approach for: • the provision of hotel accommodation, • the provision of employee uniform and • subsistence and hotel allowance claims.	Medium	Policies related to allowances , including those referred to within this audit are being reviewed or drafted as a suite of documents which will be presented to SMB by 30/12/18	HR Manager/ Head of Governance	30/12/18	~~30/04/19~~ ~~30/09/19~~ 31/03/20	**Mar 19:** New Head of Governance commenced in January 2019. Draft completed for review of HoS and SMB, recommendation by HR Manager accepted by SMB to expand coverage of policy to include "business travel" and mileage rates within the policy. For appropriate consultation with SMB/TU before implementation. **May 19:** Instruction from SMB to include rates for allowances as part of the overall review committed to by organisation and for consultation, as appropriate with trade union.	Overdue

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								Oct 19: Continuing instruction from SMB being followed with regard to rates for allowances forming part of the overall review committed to by the organisation. For consultation, as appropriate with trade union. Consultation still ongoing. **Feb 20:** Expenses for mileage rates agreed in principle. Employee uniform to follow HMRC requirements. Decision to be taken to SMB.	
Software Licensing (2018/19) December 2018	1	A Software Management policy should be developed and distributed accordingly.	Medium	A Software Management Policy will be developed and distributed to all staff	Senior ICT Manager	28/02/19	31/03/19 31/05/19 31/12/19 01/03/20 31/03/20	**Mar 19**: A Software Management Policy is being developed and will be distributed as part of the updated Information Security Policy and Acceptable Terms of Use by 31/03/19. **May 19:** This is currently in draft format to go to the ICT Operations Board and Information Governance Group. **Oct 19:** This will go to the Information Governance Group (IGG) quarterly meeting in November. It will then have to be deployed using MetaCompliance. **Feb 20:** Draft policy currently being reviewed by IGG	Overdue
IT Asset Management (2018/19) December 2018	1	The ICT Strategy should be updated and the four-year replacement strategy confirmed within it, approved and adopted	Medium	The ICT Strategy will be updated to include IT equipment life-cycle and the replacements strategy.	Senior ICT Manager	31/03/19	31/05/19 30/11/19 31/03/20	**May 19:** This is being included in the ICT Strategy which is in draft format. **Oct 19:** This is still in draft. **Feb 20:** Being progressed	Overdue

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Leasehold Service Charges (2018/19) January 2019	1	As part of the year three Best Value review of the HTS contract, the annual service charge allocation model for leaseholders should be revisited and based on actual HTS costs	Medium	Agreed	Head of Housing	31/08/19	~~31/12/19~~ 01/04/20	**Oct 19:** The recent Best Value Review of HTS P&E Ltd looked at the evidence base of existing ASC (Annual Service Charge) in terms of breaking down cost on individual services for amongst other reasons to represent charges to Leaseholders. It was found that HTS (Property and Environment) Ltd does not record currently at cost centre as HDC does and therefore it was not possible to state the profit or loss on each trading activity or cost centre individually. Based upon the evidence submitted to the review, it has not been possible to exactly determine the base operation costs of HTS (P&E) Ltd and make direct comparisons to the original 2017 business model. Further work should be conducted to ensure this is concluded as a matter of urgency to be included in the prioritised action plan to be approved at Cabinet in Dec 19. **Feb 20:** Implementation from April 2020 onwards of the variation of the cost reporting structure for HTS to correlate with the Council's cost centre arrangements. HTS (Property and Environment) Ltd have confirmed that: a) Callsys system (contractor system) has been updated from 1 January 2020, with detailed allocations of cost centres for upload to their accounting package.	Overdue

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								b) Detailed alignment of allocations to be concluded by end of February 2020.	
HTS (Property and Environment) Strategic Governance 2018/19 February 2019	2	With the assistance of Council Officers the Shareholder Sub Committee should ensure the role and remit of the Council's representative on the HTS Board is documented.	Low	As above – this will be considered by the Shareholders Sub Committee when they receive this report at their April 2019 meeting.	Chief Executive for the Council	30/09/19	~~31/03/20~~ 23/06/20	**Oct 19:** Currently being progressed. **Feb 20:** A paper on this will be submitted to the next Shareholder Sub Committee meeting, being held on 23 June 2020	Overdue
Housing Rents 2018/19 April 2019	3	Conflict of Interest forms should be completed by all staff who have access to tenant accounts in Orchard or by managers who may be able to influence the process.	Low	Any account adjustments are processed through an independent officer and approved by a team leader where appropriate. Officers cannot complete account adjustments/refunds online as they are "read access" only. Adjustments are emailed to the rent debit officer for action and all refunds are countersigned weekly by team leader / manager. The new orchard system will be able to lock down screens to individual officers so they may be able to view but unable to	Senior Housing Operations Manager Housing Assets & Business Systems Manager	31/12/19	30/04/20	**Feb 20:** All users of the Orchard Housing Management System will be required to complete Conflict of Interest forms. A version of the form which mirrors the Revenue and Benefits process is being tested. In mitigation, it should be noted that any account adjustments are processed through an independent officer and approved by a team leader where appropriate. Officers cannot complete account adjustments/refunds online as they are "read access" only. Adjustments are emailed to the rent debit officer for action and all refunds are countersigned weekly by team leader / manager. In addition, all officers are bound by the Officer's Guide of Conduct and the use of IT and personal responsibility. We will undertake a twice-yearly review of potential conflicts of interest. The new Orchard system will be able	Overdue

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				change with effect 01 April 2019. In addition, all officers are bound by the Officer's Guide of Conduct and the use of IT and personal responsibility. We will undertake a twice-yearly review of potential conflicts of interest.				to lock down screens to individual officers so they may be able to view but unable to change with effect 01 April 2020.	
Complaints 2018/19 May 2019	1	Implement a mechanism whereby actions from the lessons learnt questionnaire are followed up. This could be achieved by SMB receiving a follow up action report.	Medium	A quarterly report is sent to SMB in regards to this.	Customer and Media Services Manager/ Head of Governance	30/06/19	31/03/20	**Oct 19:** This has been happening since in a basic format since June 2019. It will give Heads of Service key trends but does require further development and this is likely to coincide with the action below. **Feb 20:** A report is still scheduled to go to SMB prior to 31 March 2020. This will outline a request to move to a two stage process and further work on a sustainable mechanism to learn from complaints.	Overdue
Complaints 2018/19 May 2019	2	Consider moving to a two stage complaints process by presenting a paper to SMB (Senior Management Board) on this	Medium	This has been considered previously and will be raised again.	Customer and Media Services Manager/Head of Governance	30/06/19	31/03/20	**Oct 19:** Although not progressed due to changes in service area, it has now been raised with Head of Governance with a view to take a report to SMB before 31/03/20 **Feb 20:** A report is still scheduled to go to SMB prior to 31 March 2020. This will outline a request to move to a two stage process and further work on a sustainable mechanism to learn from complaints.	Overdue

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HTS (P&E) and GDPR compliance 2019/20 August 2019	2	Provide periodic assurances to the HTS Senior Management Team and the Council's Data Protection Officer that the risk of non compliance with GDPR is being adequately managed. This could be achieved by sharing the information security and data protection action plan and data breach log on a quarterly basis. To begin with this should be on a monthly basis to ensure high priority/risk actions are completed promptly.	Medium	Reporting of the action plan and data breach log will be diarised. Regarding reporting within HTS, consideration will be given to including it within the formal SHEC report which goes to SMT and the Board.	HTS Data Protection Officer	30/09/19	30/11/19 31/03/20	**Oct 19:** Work is in progress and this recommendation is covered under action point 17 in the HTS GDPR action plan. So far the following action has been undertaken: • A proposal on GDPR champions was presented to HTS Senior Management Team in October for a decision by December 2019 • The September 2019 SHEC report which presented to HTS SMT & sent to Harlow Council as part of monthly pack • Data Protection Champions Role Description has been created. **Feb 20:** The action plan and data breach log has been updated and submitted to the Council. Quarterly submission of these to the Council will be diarised	Overdue

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Responsive Housing Repairs 2018/19 August 2019	2b	Post inspections completed on more complex housing repairs should be formally documented and retained.	Medium	Agreed. Customer Satisfaction Surveys are currently sent out to tenants on a sample basis. The sample size will be increased to ensure that the quality of repairs works is completed to a satisfactory standard. Post inspections completed on complex repairs works will be formally documented and retained	HTS Operations Director and the Council's Housing Operations Manager	30/09/19	~~31/01/20~~ 30/04/20	**Oct 19:** HTS carries out a 100% post inspection regime on all housing voids it completes (See enclosed handover forms to demonstrate this). There are ongoing discussions with HDC over who should be carrying out more detailed Post Inspections on completed Housing Repairs. Traditionally this has been carried out by Technical Services who transferred from HTS and now work for HDC. We will provide a further update once this is resolved. **Feb 20:** It has been agreed that HTS will carry out post inspections on repairs from 1st April 2020. These will be recorded formally.	Overdue
Conflicts of Interests and Gifts and Hospitality (Staff and Members) 2019/20	1b	The Governance Support Team should periodically reconcile the online records of declarations of gifts and hospitality completed by Officers to the completed forms signed and approved by management and to follow-up with management where forms are missing.	Medium	This will be carried out every three months.	Corporate and Democratic Services Manager	31/01/20	30/04/20	**Feb 20:** In progress and on target to be completed by the revised deadline.	Overdue