

Internal Audit Recommendation Tracker (Overdue)

Last Updated: 01 March 2019

Appendix B

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>External Data Transfers 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>01/07/17 31/12/17 30/07/18 31/01/19 31/03/19</p>	<p>May 17: A data sharing agreement between Veolia and Harlow Council has been drafted, approved by the Assistant Solicitor and sent to Veolia. Awaiting response.</p> <p>July 17: No response has yet been received from Veolia. This may be because the Veolia management team are engaged in bidding for the replacement contract. Nonetheless the Environment & 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.</p> <p>Oct 17: 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>Feb 18: 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>May 18: 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</p>	<p>Overdue</p>

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								<p>sharing agreement has therefore not been signed. Veolia will be reminded of the requirement to sign the data sharing agreement. In mitigation, limited personal data is shared with the waste contractor. On target for completion in July.</p> <p>Oct 18: The draft sharing protocol is agreed. 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> <p>Mar 19: Officers within Veolia have been identified to who will be responsible for completing the Data Sharing Protocol. As part of the contract a draft Data Sharing Protocol has been completed and will be sent to the Council's Legal team for review. The contract starts 01 April 2019 and therefore the Data Sharing Protocol must be completed and approved before that date.</p>	
				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	<p>May 2017: All information sharing processes and policies are being reviewed to ensure compliance with the GDPR.</p> <p>July 17: Internal and external resource</p>	Overdue

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								<p>has been allocated to this work, which has commenced.</p> <p>Oct 17: 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 they are data controllers [which they will be in some incidents] or data processors.</p> <p>Feb 18: 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>May 18: 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>Oct 18: 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>Mar 19: The Variation Deed for the Services Agreement is now complete and there is no further action required</p>	

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								for the formal contract by the Council's legal team. Draft data sharing protocols have been prepared for both the waste contract and HTS and the Data Protection Officer for HTS has this in hand.	
Playhouse (2017/18) October 2017	5	Liaise directly with the insurance officer to ensure the lists of contents are updated and an accurate valuation is reached.	Medium	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. Carry out review of 2011 inventory and update accordingly.	Technical and Projects Manager Community, Leisure and Cultural Services Manager	30/11/17 01/04/18	30/12/18 31/01/19 30/04/19	Feb 18: Meeting with the Council's Insurance Manager originally scheduled for February is to be rearranged for March 18. May 18: Meeting with insurance has taken place and works are ongoing and likely to be continued up to end of 2018. Oct 18: Working with insurance to obtain quotes for this work to be completed. Mar 19: Action to be taken to be confirmed at meeting with Head of Service on 12 th March	Overdue
Harlow Trading Services (Property and Environment) Limited Contract Payment Mechanisms (2017/18) May 2018	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 01/10/19	Oct 18: 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. Mar 19: Due to competing work priorities, only 28 (major & minors KPIs) out of the 78 (major, minor and measurement KPIs) are currently in the	Overdue

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								InPhase system and formally reported via JFPR. This work is ongoing for the rest of the financial year (2018/19) with projected completion date of the summer of 2019/20; as result of competing work priorities	
	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	Oct 18: 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. Mar 19: The review of the Environmental Service KPIs is underway. A review of the Non Housing Service KPIs is an also taking place. The 31 March 2019 remains the completion date for both reviews.	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	Oct 18: The payment mechanism to be included in the Best Value Review of the contract as per Cabinet report of September 2015. Mar 19: Terms of Reference for Best Value review agreed and include payment mechanism; briefing meetings for Project team and officers involved in review to be scheduled for February. Outcomes of review to be reported in January 2020.	Overdue

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Purchase Cards (2018/19) October 2018	3.1	<p>Policies are required to clarify the Council's approach for:</p> <ul style="list-style-type: none"> the provision of hotel accommodation, the provision of employee uniform and subsistence and hotel allowance claims. 	Medium	<p>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</p>	HR Manager/ Head of Governance	30/12/18	30/04/19	<p>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.</p>	Overdue
Software Licensing (2018/19) December 2018	1	<p>A Software Management policy should be developed and distributed accordingly.</p>	Medium	<p>A Software Management Policy will be developed and distributed to all staff</p>	Senior ICT Manager	28/02/19	31/03/19	<p>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.</p>	Overdue
IT Asset Management (2018/19) December 2018	4	<p>Consideration be given to making departments responsible for the verification of the assets and locations, with IT then undertaking a small sample test.</p>	Low	<p>This will be discussed with the Senior Management Board as to the practicalities and risks that this may introduce.</p>	Senior ICT Manager	31/01/19	31/03/19	<p>Mar 19: This still needs to be discussed with the Senior Management Board</p>	Overdue
IT Asset Management (2018/19) December 2018	5	<p>An annual asset to inventory reconciliation process be introduced to confirm the numbers of IT assets within departments. ICT may then undertake a compliance check</p>	Low	<p>This will be discussed with the Senior Management Board as to the practicalities and risks that this may introduce.</p>	Senior ICT Manager	31/01/19	31/03/19	<p>Mar 19: This still needs to be discussed with the Senior Management Board</p>	Overdue

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		on a sample basis.							
Playhouse (Cash unders and overs) follow up 2018/19 January 2019	1b & 1c	Cash handling procedures to be documented and clearly state the responsibilities to protect cash. Staff to sign and agree to these procedures. Cash handling procedures should be displayed in prominent locations around the bar area to remind staff.	Medium	The Playhouse Manager is in the process of developing cash handling procedures in consultation with the Head of Community Wellbeing.	Playhouse Manager	31/01/19	30/04/19	Mar 19: Action to be taken to be confirmed at meeting with Head of Service on 12 th March	Overdue
	1d	All staff involved in cash handling and banking should receive finance training to raise aware of the importance of following correct cash handling procedures.		Training to be arranged in the new year with the Duty Manager (Contact Harlow) - The Playhouse Manager and HR have arranged this.	Playhouse Manager	28/02/19	30/04/19	Mar 19: Playhouse Manager to delegate to Commercial and Development Manager – Internal Audit will be copied in to email.	Overdue