

**Internal Audit Recommendation Tracker (Overdue)**

Last Updated: 09 November 2019

**Appendix D**

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
<b>External Data Transfers</b> 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)  Legal Services Manager, Land Charges, Information Governance, Operational Procurement Manager  Head of Governance	(HTS) - Assistant Solicitor/ Head of Governance	01/02/17	<del>25/05/18</del> <del>31/01/19</del> <del>31/03/19</del> 30/11/19	<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>Mar 19:</b> The Variation Deed for the Services Agreement is now complete and there is no further action required 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.</p> <p><b>May 19:</b> Concluded operational discussions to get a better understanding of the data shared between HDC &amp; HTS. The information will now be used to populate the ROPA and the Information Sharing Protocol by the end of May 2019.</p> <p><b>Oct 19:</b> Due to the work required for the Best Value Review of HTS (P&amp;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</p>	Overdue

**Internal Audit Recommendation Tracker (Overdue)**

**Appendix D**

Last Updated: 09 November 2019

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
<b>Purchase Cards (2018/19)</b> October 2018	3.1	<p>Policies are required to clarify the Council's approach for:</p> <ul style="list-style-type: none"> <li>the provision of hotel accommodation,</li> <li>the provision of employee uniform and</li> <li>subsistence and hotel allowance claims.</li> </ul>	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	<p><del>30/04/19</del> 30/09/19 31/03/20</p>	<p><b>Mar 19:</b> 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> <p><b>May 19:</b> 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.</p> <p><b>Oct 19:</b> 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.</p>	Overdue
<b>Software Licensing (2018/19)</b> 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	<p><del>31/03/19</del> 31/05/19 31/12/19</p>	<p><b>Mar 19:</b> 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> <p><b>May 19:</b> This is currently in draft format to go to the ICT Operations Board and Information Governance Group.</p> <p><b>Oct 19:</b> This will go to the Information Governance Group quarterly meeting in November. It will then have to be deployed using MetaCompliance.</p>	Overdue

**Internal Audit Recommendation Tracker (Overdue)**

Last Updated: 09 November 2019

**Appendix D**

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
<b>IT Asset Management (2018/19)</b> 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	<del>31/05/19</del> 30/11/19	<b>May 19:</b> This is being included in the ICT Strategy which is in draft format. <b>Oct 19:</b> This is still in draft.	Overdue
<b>Leasehold Service Charges (2018/19)</b> 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	<b>Oct 19:</b> 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.	Overdue

## Internal Audit Recommendation Tracker (Overdue)

## Appendix D

Last Updated: 09 November 2019

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
<b>HTS (Property and Environment) Strategic Governance 2018/19</b> 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.	Managing Director for the Council	30/09/19	31/03/20	<b>Oct 19:</b> Currently being progressed.	Overdue
<b>Safeguarding 2018/19</b> February 2019	3b	The Safeguarding record/policy should be updated so that it is clear on what data should be kept, where and for what period, in line with GDPR and the Council's retention policy.	Medium	This will be included in the next policy review/update.	Youth and Citizenship Manager, (Head of Community Wellbeing)	30/11/19	01/01/21	<b>Oct 19:</b> The Safeguarding Policy will not be reviewed until late 2020/early 2021	Overdue
<b>Complaints 2018/19</b> 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	<b>Oct 19:</b> 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.	Overdue
<b>Complaints 2018/19</b> 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	<b>Oct 19:</b> 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	Overdue

**Internal Audit Recommendation Tracker (Overdue)**

**Appendix D**

Last Updated: 09 November 2019

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
<b>Customer Services Review 2018/19</b> May 2019	1	Revisit the Customer Service Review Action Plan ensuring the revised/new Action Plan has SMART objectives and measurable benefits in place, with regular reporting against these to the Customer Services Board. The Action Plan should be explicit on outcomes and benefits for customers, how this will be achieved and measured. Consideration should be given to the Action Plan being a programme of projects, including any relevant/interrelated projects not owned by the Customer Service Board, to ensure the Board has a holistic overview.	Medium	The Customer Services Board will discuss this at the next meeting with a view to implementing the recommendations.	Customer and Media Services Manager)/ Head of Governance	30/09/19	31/03/20	<b>Oct 19:</b> Customer Service Board was due to meet in July 2019 but this was cancelled due to service moving to Governance in August 2019. Meeting set for 11/11/19 to discuss next steps.	Overdue
<b>Customer Services Review 2018/19</b> May 2019	2	The Customer Services Board should ensure for the projects it is responsible for	Medium	There is not a formal project management methodology adopted at the	Customer and Media Services Manager)/ Head of	30/09/19	31/03/20	<b>Oct 19:</b> As above; Customer Service Board to meet to discuss next steps.	Overdue

**Internal Audit Recommendation Tracker (Overdue)**

Last Updated: 09 November 2019

**Appendix D**

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
		formal project methodology is in place, using the checklist as at appendix A as an aide memoir. This includes establishing, where appropriate, Officer project groups at the earliest opportunity who have an agreed Terms of Reference and project plan. In addition, a lessons learnt review of the cash office closure project should be undertaken.		council. All future projects will follow the basic guidelines. A lessons learnt review will be done.	Governance				
<b>Customer Services Review 2018/19</b> May 2019	3	The Customer Services Board should meet on a regular basis. This could be achieved by setting up meetings a year in advance.	Low	This will be done.	Customer and Media Services Manager)/ Head of Governance	30/06/19	31/12/19	<b>Oct 19:</b> Customer Service Board was due to meet in July 2019 but this was cancelled due to service moving to Governance in August 2019. Meeting set for 04/11/19 to discuss next steps.	Overdue
<b>HTS (P&amp;E) and GDPR compliance 2019/20</b> August 2019	1	Review, and where relevant, update the information security and data protection action plan on the back of the findings of this audit. A copy should be supplied to the Council's Internal	Medium	Work is already in hand to update the action plan.	HTS Data Protection Officer	13/09/19	30/11/19	<b>Oct 19:</b> Work is in progress and this recommendation is covered under action point 1 in the HTS GDPR action plan.	Overdue

**Internal Audit Recommendation Tracker (Overdue)**

Last Updated: 09 November 2019

**Appendix D**

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
		Auditors and the Council's Data Protection Officer when updated.							
<b>HTS (P&amp;E) and GDPR compliance 2019/20</b> 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	<b>Oct 19:</b> 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: <ul style="list-style-type: none"> <li>• A proposal on GDPR champions was presented to HTS Senior Management Team in October for a decision by December 2019</li> <li>• The September 2019 SHEC report which presented to HTS SMT &amp; sent to Harlow Council as part of monthly pack</li> <li>• Data Protection Champions Role Description has been created.</li> </ul>	Overdue

## Internal Audit Recommendation Tracker (Overdue)

Last Updated: 09 November 2019

## Appendix D

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
<b>Responsive Housing Repairs 2018/19</b> August 2019	2(b)	Post inspections completed on more complex housing repairs should be formally documented and retained.	Medium	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	<p><b>Oct 19:</b> HTS carries out a 100% post inspection regime on all housing voids it completes (See enclosed handover forms to demonstrate this).</p> <p>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.</p> <p>We will provide a further update once this is resolved.</p>	Overdue