

IMPLEMENTATION POSITION OF LOW AND MEDIUM RISK RECOMMENDATIONS
ISSUED QUARTER 2 2011/12

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE incl. PLANNED IMPLEMENTATION DATE	CURRENT STATE OF IMPLEMENTATION PER MANAGER
Benefit Fraud Investigation – 25 August 2011		
<p>Refresher 'referrals' training should be provided to all Benefits assessment staff to ensure that they are aware of which cases should be referred to the Benefit Fraud Team for investigation.</p>	<p><i>Benefit & Fraud Manager & Benefit Fraud Investigator:</i> As mentioned in the report the Benefit & Fraud Manager has arranged for some training with DWP and we are awaiting the date for this. The Benefit Fraud Investigator is to arrange refresher training for assessment staff. December 2011.</p>	<p>The DWP have not provided any further information regarding the training that they offered. However the Fraud team have provided refresher training to all Benefit staff including our two new apprentices.</p>
<p>Consideration should be given to the use of a separate Workflow queue to highlight these cases so that they are flagged for the Benefit Fraud Team's attention.</p>	<p><i>Benefit & Fraud Manager:</i> We will not be putting this into place. Most of the returned post is received after we know that the customer has left. The returned post is scanned to the urgent queue that is cleared on a daily basis and if the claim is still live it is more important that the case is cancelled to prevent further payments being made. Staff are aware of the need to refer these cases to fraud once payments have been stopped.</p>	<p>No further response required.</p>

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Guidance should be produced to advise Benefits assessment staff of the types of cases that they should, or should not, be referring to the Benefit Fraud Team.	<i>Benefit & Fraud Manager:</i> Guidance will be produced regarding the referrals and will form the basis of the refresher training. December 2011.	Implemented – guidance provided via training.
A summary report should be produced for Benefits assessment staff on a regular basis highlighting any emerging themes from cases referred to the Benefit Fraud Team.	<i>Benefit Fraud Investigator:</i> The Benefit Fraud Investigator is to produce a monthly summary of fraud outcomes. October 2011.	Details of emerging themes are shared with the assessors as soon as identified. These do not warrant a monthly report. Detailed statistics, however, are compiled and scrutinised.
The Benefit Fraud Strategy and associated Code of Conduct documents should be updated to reflect current arrangements.	<i>Benefit & Fraud Manager:</i> These documents are currently under review. December 2011.	Due to go to Sept F & A.
Investigation files should be indexed and documentation contained within the files should be referenced to provide a clear trail to the reader of the file.	<i>Benefit Fraud Investigator:</i> The files do contain a record sheet that details all actions and information obtained. Documents are not indexed and we will ensure that this is done. September 2011.	This is now in place – documents now being indexed.
All documentation should be clearly dated to ensure that the timeliness of investigations can be ascertained.	<i>Benefit Fraud Investigator:</i> As above. September 2011.	This is now in place.

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<p>A report should be prepared for the Benefits & Fraud Manager to enable her to review cases investigated by the Benefit Fraud Investigator that have not led to a sanction being recommended.</p>	<p><i>Benefit Fraud Investigator:</i> The Benefit & Fraud Manager is now reviewing all cases that have been investigated, regardless of outcome. A specific report is not, therefore, considered necessary.</p>	<p>No further response required.</p>
<p>All files should be signed off by the Benefit Fraud Investigator or another relevant senior officer to confirm that the case has been reviewed and it can be formally closed.</p>	<p><i>Benefits & Fraud Manager:</i> As above, as part of the review process, the Benefits & Fraud Manager is now signing off all files. Immediate.</p>	<p>In place.</p>
<p>Details of previous conviction enquiries should be recorded on the working papers for each case to ensure that the authorising officers have sufficient evidence to enable them to reach an informed conclusion when authorising the appropriate sanctions.</p>	<p><i>Benefit Fraud Investigator:</i> Agreed. This will be implemented. Immediate.</p>	<p>In place.</p>
<p>Network Security & Administration – 23 September 2011</p>		
<p>The process for updating ICT Services of staff leavers in a timely manner should be reviewed and strengthened if possible, with consideration of any facility for automated notification that might be available from the new Oracle HRMS system.</p>	<p><i>HR Manager:</i> Agreed. Once the migration the HRMS system has been completed, the process for notifying ICT Services of starters / leavers will be reviewed. February 2012.</p>	<p>HRMS migration completed December 2012 with both HR and Payroll on the same system. There is in place a 'workflow' (automated email) that advises a number of people when a leaver is entered on the system. ICT is one of these as well as parking etc.</p>

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<p>The environmental conditions within the network installation room at the Pump Rooms premises should be reviewed based on a formal threat/risk assessment of the area. Ideally the room should only house IT and network communications equipment with the water source and storage of general items relocated to a different area.</p>	<p><i>Infrastructure Manager / Heritage & Arts Manager:</i> Agreed. ICT Services has made an initial assessment and removed all unnecessary ICT Equipment. ICT have contacted the Pump Rooms Building Supervisor who has escalated the issue regarding the water tank. February 2012.</p>	<p><i>Building Supervisor, Royal Pump Rooms:</i> All old PCs and equipment have been removed from the Comms Room except for the water tank that is now empty and the pump switched off. A decision has yet to be taken regarding the status of the water feature though I suspect very strongly it will never run with water again!</p>
<p>Information Governance – 14 September 2011</p>		
<p>Responsibility for the governance of information assets should be clarified and formally assigned to a named officer or group of officers.</p>	<p><i>Corporate Management Team:</i> The Draft Report was considered by Senior Management Team on 17th August 2011. The item was minuted as: "SMT considered report from Internal Audit and discussed best way of implementing and making it sustainable going forward. Identify previous work done on this and revisit with view to drawing out key actions for future".</p>	<p>CMT took the view that this piece of work was not a priority given the necessity to increase the speed of delivery of FFF. However, time has now been allocated to consider the recommendations and DCX (AJ) will progress this work with a full response by the end of the year.</p>
<p>Consideration should be given to establishing an 'Information Management Steering Group' with a remit to focus on the governance of all information assets.</p>		<p>See above.</p>

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The following action points to address issues and potential areas of risk identified from this audit should be considered by the responsible officer or group of officers as designated:		See above.

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<ul style="list-style-type: none"> • the corporate risk assessment process, both strategic and operational, should identify and assess all aspects of risk that could compromise the security of information assets. This could be achieved by issuing risk owners within all service areas guidance on how to identify such risks; • the need for an information management strategy should be assessed, with particular reference to the 'Fit for the Future' Programme; • corporate policy should be defined and formally adopted by all service areas in relation to the retention and disposal of information assets. Consideration should be given to integrating all aspects of the information lifecycle, including retention and destruction, into a single document entitled 'Records Management Policy' in line with good practice; and • safety or other desirable outcomes for customers. • protocols should be agreed to facilitate internal information sharing across service areas, especially outside normal business operations where this can be shown to be lawful and in the interest of community. 		

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Leaseholder Service Charges – 30 September 2011		
<p>Concerted efforts should be made to ensure that a new Leaseholder Management System is put in place.</p>	<p><i>Senior Technical Administration Officer:</i> STAO to contact other MIS users e.g. Walsall Housing Group to establish how they use the system for Leasehold Management. The names and any correspondence addresses of leaseholders have already been input into MIS. 31 December 2011.</p>	<p>The STAO has been working with ICT Services to ensure that leasehold service charges can be managed through MIS. The leasehold management system in MIS will also link to the Planned Maintenance Module which is being finalised for implementation in December 2012. Initial contact has been made with Raglan Housing who use MIS for leasehold management.</p>
<p>Discussions should be held on a regular basis between Technical Administration staff and Surveyors (and other relevant staff) to ensure that Technical Administration are aware of any major works projects that are forthcoming for which leaseholders need to be recharged.</p>	<p><i>Senior Technical Administration Officer:</i> This is now a standing item discussed at the weekly Managers briefing which is attended by the Property Manager, Energy Manager, Building Construction & Surveying Manager, Repairs & Maintenance Manager and the STAO. Weekly and ongoing.</p>	<p>No further response required.</p>

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<p>The leaseholder handbook should be updated and reissued as soon as possible.</p>	<p><i>Senior Technical Administration Officer:</i></p> <p>Monthly meetings are held between the STAO & the Chair of LAG where the updating of the handbook has been discussed.</p> <p>The STAO is working with the Chair of LAG to update the handbook and there is a leaseholders questionnaire to be sent out in October that will ask for volunteers to be involved in updating the handbook.</p> <p>31 December 2011.</p>	<p>The leaseholder handbook has been updated in line with the new Tenant Handbook (approved in August 2012) to ensure consistency across our Service on the common areas such as estate management.</p> <p>The new handbook was developed by the STAO working in partnership with the LAG Committee.</p> <p>We are working with the Media Team on the layout of handbook & a first draft will be available by the end September 2012.</p>
<p>Licensing – 31 August 2011</p>		

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<p>Documentation should be drawn up that formally delegates powers to the Licensing Services Manager.</p>	<p><i>Licensing Services Manager, Head of Community Protection and Civic & Committee Services Manager:</i></p> <p>Agreed to draw up documents formally delegating powers to the Licensing Services Manager.</p> <p>End of current financial year (April 2012).</p>	<p><i>Licensing Services Manager:</i></p> <p>All delegation has now been amended to reflect that all delegations necessary are to Head of Community Protection as per company policy.</p> <p><i>Civic & Committee Services Manager:</i></p> <p>The scheme of delegation is established, based on advice from Head of Legal Service, so that delegations are to Heads of Service. Heads of Service are authorised to authorise officers to work on their behalf but should keep local evidence of which people they have authorised i.e. Licensing Services Manager (CP1 to CP 9) I believe.</p> <p>The scheme of delegation has just been reviewed and considered by Executive for approval by Council in September. However some changes were made at a more recent Executive for Licensing Services.</p>

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<p>DMC and Reception staff should be reminded of the correct codes for each type of payment received.</p>	<p><i>Licensing Services Manager, Head of Community Protection and Senior Committee Services Officer:</i></p> <p>Response from the Licensing Services Manager:</p> <p>Every time that a charge changes and when a mistake is found, I email both DMC and the staff on Reception giving the new amount and code. I sit down with the DMC Team Leader from time to time and go over the cost codings and the amounts due. Licensing have recently trained the Reception staff on all matters of licensing and stressed the importance of correct coding amongst other things. If we do not see the document which is incorrectly coded until the day after it is received neither DMC nor the Reception staff can amend the code and we must then pass it to Income for recoding. I feel it would be difficult to either remind the staff at DMC or on Reception any more often or with any greater emphasis than both myself or the team do all ready.</p>	<p>No further response required.</p>

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<p>Licensing staff should check the coding on receipts to ensure that the payments have been coded correctly.</p>	<p><i>Licensing Services Manager:</i> Response from the Licensing Services Manager: I feel that Licensing is perhaps unfairly taking the blame for the poor processes and carelessness of other departments. These services are provided at no inconsiderable cost to Licensing and for us to have to check their work is a poor reflection upon them rather than upon the Licensing team.</p>	<p>No action necessary for Licensing Services – action required by DMC. They are notified each time they make a mistake.</p>
<p>Rateable values should be checked each year to ensure that the correct annual premises license fees are being paid.</p>	<p><i>Licensing Services Manager:</i> Response from the Licensing Services Manager: The non-domestic rateable values are changed on a 4 yearly cycle. The Licensing Services Manager spent a considerable amount of time when they were changed last, at the request of income, checking ALL of our licences were showing the correct payment band. I feel, personally, that the time taken to check these annually could not be justified by the officer time involved.</p>	<p>No further response required.</p>

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Errors identified (by Internal Audit) with respect to premises license fees paid should be followed up, with the correct fee being charged based on the current rateable value of the properties.	<i>Licensing Services Manager:</i> Agreed. As soon as the identified errors are passed to the Licensing Services Manager, they will be changed in the licensing records and Income will be notified if any changes to the annual fee are due. Immediate (Complete).	No further response required.

IMPLEMENTATION POSITION OF HIGH RISK RECOMMENDATIONS
ISSUED QUARTER 4 2011/12

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE incl. PLANNED IMPLEMENTATION DATE	CURRENT STATE OF IMPLEMENTATION PER MANAGER
Royal Spa Centre – 7 March 2012		
Visits to the bank to obtain change for the bar and catering should cease and the services of G4S should be used.	<i>General Manager:</i> Assistant Manager (Bars and Catering) to speak with Business Support Officer to put this in place. Immediate.	Recommendation implemented – G4S are now being used.