

APPENDIX 3

SUMMARY OF RECOMMENDATIONS AND MANAGEMENT RESPONSES FROM INTERNAL AUDIT REPORTS **ISSUED QUARTER 4, 2014/15**

Report Reference	Recommendation	Risk Rating ¹	Responsible Officer	Management Response and Target Implementation Date
Emergency Planning and Business Continuity Management – 30 March 2015				
4.3.16	A decision should be taken as to whether the Elected Members Major Incident Plan is formally issued.	Low	Civil Contingencies Officer	Agreed. The issue will be discussed with the Portfolio Holder following the May elections. 30 June 2015.
4.4.14	Consideration should be given to undertaking some general awareness training for staff that are not included in the Gold and Silver groups.	Low	Civil Contingencies Officer	Agreed. Appropriate training will be provided. 31 March 2016.
Partnership Working – 31 March 2015				
4.3.3	The council's partnership policy should be reviewed and reported to Executive for approval.	Medium	Deputy Chief Executive	Policy will be reviewed by end of calendar year. 31 December 2015.

¹ Risk Ratings are defined as follows:

- High: Issue of significant importance requiring urgent attention.
Medium: Issue of moderate importance requiring prompt attention.
Low: Issue of minor importance requiring attention.

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4.4.9	How scrutiny of the council's partnerships should be undertaken should be included in the next review of the partnership policy.	Medium	Deputy Chief Executive	Agreed. See above. 31 December 2015.
4.5.6	A report should be presented to Executive seeking an exception to the council's Code of Procurement Practice for the work in managing local nature reserves.	Medium	Head of Neighbourhood Services	Procurement Manager has advised that WWT is a sole provider and that there is therefore no need to go out to tender or to get an exemption from Executive. Instead, the Procurement Manager is satisfied that the arrangements be added to the Contract Register in order to note future requirements and the expenditure.
4.6.2	The removal of partnership working should be recorded and managed in service area risk registers where appropriate.	Medium	Deputy Chief Executive	Agreed. To be actioned as part of the Policy review. 31 December 2015.
Collection of Council Tax – 27 January 2015				
4.3.10	Documentation should be produced and retained to support all debts written off.	Low	Exchequer Manager	Staff will be reminded that appropriate documentation is to be processed for all accounts to support write-off. Immediate.
4.3.12	The delegation of authorisation for writing off council tax debts over £1,000 to the Exchequer Manager should be formally documented.	Low	Head of Finance	Head of Finance to formally document the required delegated authorisation. 31 March 2015.

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Collection of National Non-Domestic Rates – 27 January 2015				
4.1.2	To strengthen control the annual NNDR Civica billing audit evidence file should document clearly those items set out in paragraph 4.1.2 of the Internal Audit report.	Medium	Exchequer Manager	Agreed. Year-end Feb 15.
Infrastructure Security and Resilience – 5 March 2015				
3.2.2	The infrastructure team should review options around enabling firewall logging on the external firewalls.	Low	Head of ICT	The logging on the external firewall has been amended to match that of the internal firewall.
3.2.3	The 'warwick-support' account should be disabled on each of the firewalls and replaced with named individual administrator accounts for those requiring access.	Medium	Head of ICT	Individual accounts have been created for named individuals to remove the need to use the generic 'warwick-support' account.
3.4.3	The Admin, Administrator and Guest accounts should all be renamed as a matter of good practice.	Low	Head of ICT	The accounts listed have all been renamed.
3.5.6	Management should create a Disaster Recovery report template to be used during the next annual test. This should include the time taken to recover systems and services, whether recovery objectives have been met and include detail on any issues and/or actions arising from the testing.	Medium	Head of ICT	Accepted – A DR report template will be created in time for the 2015 DR test. November 2015.

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Software Licensing – 21 March 2015				
3.3.3	ICT Management should document the process to be followed when entering / amending data regarding applications in Snow. This should include detail on which fields must be completed and the extent of evidence that should be attached.	Low	Head of ICT	Agreed. Ad documented process will be developed. June 2015.
3.4.3	ICT Management should perform an exercise to gather licensing information and evidence relating to 'line-of-business' applications. An ongoing requirement that business System Owners provide ICT with relevant license evidence at the point of acquisition should be introduced.	Medium	Head of ICT	Maintaining and verifying licence information can be an onerous task and therefore needs to be proportionate to the risk. It is believed that a number of our business applications have site licences or in-built connection counters which prevent licences being exceeded. ICT will conduct an audit of business app licensing models and seek further guidance from the ICT Steering Group. May 2015.
3.6.3	ICT Management should obtain assurance from Snow that the application accurately reflects the licenses purchased and detailed in the MLS and that any errors have been rectified.	Low	Head of ICT	The import of the MLS has been completed satisfactorily.

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Data Protection – 25 February 2015				
<p>The purpose of the assignment was to ascertain progress in implementing recommendations from an earlier review and to assist with the implementation process on a consultancy basis.</p> <p>The audit noted that the original timescales envisaged for implementation (completion by July 2014) had subsequently proved unrealistic due to other priority demands on available resources and that the process is likely to slip into 2015/16. (Further Internal Audit input is planned to assist.)</p> <p>The audit concluded that the process of improving data protection governance arrangements in line with current law and good practice is clearly underway, although there are still some important areas to be progressed once the updated policy and guidance material is adopted.</p> <p>Compliance with the statutory provisions on subject access rights has shown significant improvement in the months since the 2014 audit, but the records still suggest failings within the Service Areas in ensuring that the response timescales are met.</p> <p>No new recommendations arose from this update.</p>				
Payment Card Industry Data Security Standards – 30 March 2015				
<p>The audit was undertaken to look at the approach that has been taken with regards to achieving PCI DSS compliance and the steps that still need to be taken. This included the methods used in securing the card payments and details taken by the Customer Services Centre at Warwickshire County Council on our behalf and payments taken at the various Cultural Services facilities.</p> <p>The Payment Card Industry Data Security Standard (PCI DSS) is mandated by the main card issuing companies (e.g. Visa, MasterCard, American Express etc.) and is an amalgamation of the standards that each company previously had in place.</p> <p>The aim of the standard is to help organisations proactively protect customer card data including PIN numbers and personal data held on the cards. The scope of the standard includes the ICT inventory that deals with the data, including any networks that the data may cross, and the physical security of the locations taking the payments.</p> <p>Non-compliance with the standard can lead to fines being levied and possibly the suspension of card payment acceptance.</p> <p>The audit concluded that there is a substantial degree of assurance that the measures being taken to ensure compliance with the Payment Card Industry Data Security Standard are appropriate.</p> <p>The review did highlight, however, that the Council has not yet completed the relevant self-assessments to show compliance and that, as a consequence, fines were being imposed on an ongoing basis amounting to approximately £10,000 for the current financial year. The report emphasised, therefore, the importance of completing the project as soon as possible.</p> <p>No formal recommendations are included in the report as staff are aware of the steps that are still required for compliance to be achieved (notably the introduction of a compliant solution for the Royal Spa Centre box office and the completion of the relevant self-assessments) and lessons to be learnt from the project have been identified by them.</p>				

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Communications – 27 January 2015				
3.2.3	The links that the Communications strategy has with the People Strategy and Channel Strategy should be clearly established.	Low	Customer Contact Manager	Noted. The Channel Strategy is complete. The links with the People Strategy in relation to Staff Engagement are now in place with a regular update being provided to the People Strategy Steering Group. December 2014.
3.2.3	The ongoing Staff Engagement work should be incorporated within the Communications Strategy.	Low	Customer Contact Manager	The Staff Engagement work is incorporated within the Communication Strategy. January 2015.
3.2.3	The Communication Strategy Action Plan should be monitored and reported to the Senior Management Team at appropriate intervals.	Medium	Customer Contact Manager	An agenda item will be on the SMT agenda at regular intervals in addition to the Staff Engagement Action Plan updates. June 2015.
Homelessness and Housing Advice – 3 March 2015				
4.2.6	Care should be taken to ensure that documentation is retained with the correct case files (either electronic or paper based).	Low	Housing Advice & Allocations Manager	All staff will be reminded of the importance of document management. A monthly file audit will be introduced to monitor document management. 31 August 2015.

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4.3.5	Staff are reminded of the need to accurately complete all relevant fields in Active-H.	Low	Housing Advice & Allocations Manager	All staff will be reminded of the importance of completing fields on Active-H accurately. A monthly file audit will be introduced to monitor the accuracy of data entry. 31 August 2015.
Newbold Comyn Leisure Centre – 10 March 2015				
4.5.3	The £100 petty cash imprest should be repaid from one of NCLC's budgets.	Low	Sports Facilities Area Manager	Petty cash imprest account has been reimbursed from NCLC budget. Petty cash no longer in use in leisure centres and has been replaced by purchase cards with authorised users. 19 March 2015.
4.6.2	The stock control option in Flex should be used as intended to enable standard stock control to operate.	Medium	Operations Manager	Nominated Receptionist will be responsible for carrying out stock checks and report any concerns to Operations Manager. Operations Managers will review stock records on a monthly basis and address any discrepancies. 13 March 2015.
4.8.6	Supervisors and receptionists should be instructed to ensure that the end of shift cashing-up routine involves two people and that the cashing-up sheet is signed by both of them.	Medium	Operations Manager	A memo sent out to Receptionists and Supervisors instructing them to comply with regulation. Operations Manager will maintain an overview of compliance and raise irregularities with relevant staff. 13 March 2015.

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4.8.7	All staff responsible for issuing membership cards should be reminded of the importance of entering issue details on the log sheets.	Medium	Operations Manager	All staff reminded of the importance of completing membership card issue log. This will be monitored by the supervisors on an ongoing basis. Completed sheets are signed off by Operations Managers before being sent to Riverside House. 13 March 2015.
4.8.8	Managers at all sites should ensure that copies of all completed membership card log sheets are forwarded to the Business Support Manager.	Medium	Sports Facilities Area Manager	Operations Managers send their completed logs to the Business Support Manager who will check for accuracy. 31 March 2015.
4.8.12	The centre manager should ensure the correct application of VAT to invoices raised manually.	Medium	Operations Manager	All managers are aware that VAT needs to be added to fees and charges figures unless otherwise stated. Fees and charges document to be altered to make sure that non vat figures are clearly identifiable. 13 March 2015.
4.9.4	The centre manager should instruct all staff to complete and sign the signing in and out book and ensure that any visitors do the same.	Medium	Operations Manager	Memo gone out to all staff to say they have read and understood the requirement for staff and visitors to sign in and out. This will be monitored daily by the supervisor on each shift. 19 March 2015.

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Economic Development – 31 March 2015				
3.5.7	Formal arrangements for scrutiny of DMO reports and accounts by senior management and Members should be established.	Medium	Head of Development Services / Head of Finance	Board reports to be circulated by ED&R manager to DS HoS and Head of Finance. Immediate. Annual Scrutiny Report or Presentation (depending on preference of scrutiny). Annually, by each November.
Environmental Protection Functions – 30 January 2015				
3.6.5 (1)	Enhanced exception reporting from APP Civica should be explored to comprehensively capture unclosed service request cases.	Low	Head of Health and Community Protection	Agreed. Now that we have filled a vacant post with some responsibility for collating performance data, this will be monitored through DMT meetings. April 2015.
3.6.5 (2)	Unclosed APP Civica service requests should be monitored at appropriate intervals to ensure prompt closure action where required.	Low	Head of Health and Community Protection	As above. April 2015.
3.9.6	The Contaminated Land Inspection Strategy should be revised to reflect the current approach to discharging the Council's obligations on contaminated land.	Low	Head of Health and Community Protection	The Strategy will be revised. June 2015.

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Refuse Collection and Recycling – 19 March 2015				
4.2.15	Staff should again be reminded of the need to ensure that an appropriate level of detail is recorded on Flare so that anyone else reviewing the case can ascertain exactly what has been done to resolve the issue.	Medium	Senior Contract Officer	This work is ongoing and has been brought up in regular 1 to 1's with the Contract Officers. This will continue on a regular basis to ensure compliance. October 2015.
4.2.15	A review should be performed of the complaints that have not been closed on the system to ensure that action is, or has already been, taken as appropriate to investigate the issues raised.	Medium	Senior Contract Officer	Due to a recent Service Area restructure, a review of categorising will be carried out shortly. October 2015.
4.3.7	The issues identified in relation to the variation orders are investigated and are resolved as appropriate.	Low	Senior Contract Officer	The issues have been investigated and amended variation orders have been issued to the contractor. Completed.
4.5.2	A copy of the performance bond in relation to the contract should be obtained.	Low	Head of Neighbourhood Services	The issue is being followed up by the Head of Neighbourhood Services with Legal Services (WCC) who are currently looking into the issue. In progress.