

IMPLEMENTATION POSITION OF LOW AND MEDIUM RISK RECOMMENDATIONS
ISSUED QUARTER 3 2012/13

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE incl. PLANNED IMPLEMENTATION DATE	CURRENT STATE OF IMPLEMENTATION PER MANAGER
Corporate Property and Portfolio Management – 31 December 2012		
<p>Consideration should be given to assigning responsibility for the Deeds Store to a specified officer or section and for them to provide supervised access and a more sophisticated document tracking system.</p>	<p><i>Economic Development and Regeneration Manager:</i></p> <p>Discussions have been underway with the Democratic Services Manager to deal set up a robust system that is compliant.</p> <p>An interim solution of the management of the Deed Store is required as has the potential to be impacted on by the Housing and Property Services restructure – which proposes to take on Estates Management.</p> <p>Systems being developed with WCC Legal to deal with property risk and access.</p> <p>End May 2013.</p>	<p>Deed Store transferred to DMC and new systems of access being implemented. WCC Legal assisting. Interim measures and restricted access were implemented before the transfer.</p> <p>DMC taking on responsibility as it will include documentation that covers a number of units (e.g. Devpt Services, Members Services, H&PS)</p>

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<p>A detailed examination of the insurance situation for all NOCPs should be undertaken to ensure that it is being charged, recharged and allocated appropriately and correctly.</p>	<p><i>Estates Manager / Insurance Officer:</i> Inspections for vacant properties have been ordered with Property to comply with insurance. In place. Work on insurance charging/recharging being carried out alongside reviews of all leases and property condition inspections. Commencing March 2013.</p>	<p><i>Insurance and Risk Officer:</i> Insurance charging has been checked to ensure premium income and expenditure allocated correctly. Invoicing records are updated following renewal to ensure we are invoicing the correct premium.</p> <p>As far as I'm aware we are recharging insurance where required in the lease.</p> <p><i>Estates Manager:</i> I am happy that the insurances are being charged/collected appropriately and I will ensure that the Insurance & Risk Officer is made aware of any additions/changes, etc.</p>
<p>ICT Backup Strategy, Processes and Procedures – 1 November 2012</p>		
<p>The ICT Electronic Information Backup Policy should be updated to provide clear guidance as to the Council's approach to backup encryption.</p>	<p><i>ICT Services Manager:</i> Agreed. The backup policy has been amended to clarify the position on backup encryption for corporate backups, including the addition of a risk assessment. The encryption guidance for all other backups remains valid. Complete.</p>	<p>No further response required.</p>

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<p>The Council should build a regular review into their tape retention policy to keep track with developing technology.</p>	<p><i>Infrastructure Manager:</i> Agreed. HP Data Protector has 'fair' and 'poor' warnings for tapes based on usage and age. Each time a tape goes 'fair' the operating lifespan of the tape will be validated against the suppliers' current best practice for tape retention and usage. Complete.</p>	<p>No further response required.</p>
<p>ICT Business Applications – Active H Integrated Housing Management System – 14 December 2012</p>		
<p>The need for classifying the data held within Active H should be reviewed, with steps taken accordingly depending on the outcome of this review.</p>	<p><i>Business Manager:</i> Agreed. The need for classifying data held within Active H will be reviewed. April 2013.</p>	<p>We have reviewed the need for classifying data in conjunction with the Data Handling Policy.</p> <p>We are undertaking a wider data management project to include data handling and data storage to ensure compliance with the stricter rules from central government about security. These include allowing connection to the central government Public Sector Network (PSN), Our new target date for completion will be July 2014.</p>

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<p>Password control should be strengthened by amending parameters within the system. Minimum length requirement should be set to eight characters and frequency of password changes should be reduced to every 90 days in line with other systems in use.</p>	<p><i>Application Support Analyst & Senior Finance Officer:</i> Testing will be performed to ensure that these suggested changes will not invalidate users' current passwords, and lock them out of the system. April 2013.</p>	<p>Password length has now been amended to eight characters and the frequency of password changes now reduced to 90 days. This was implemented in September 2013 when ActiveH was upgraded to version 6.0.1.0.</p>
<p>The 'account lockout threshold' within the security parameters should be amended to lock users out after a specific number of unsuccessful attempts.</p>	<p><i>Application Support Analyst & Senior Finance Officer:</i> This will be covered as part of the testing detailed above. April 2013.</p>	<p>The account lockout threshold has been reduced to five attempts. This was implemented in September 2013 when ActiveH was updated to version 6.0.1.0.</p>
<p>The purpose and origin of the instance-level 'administrator' should be ascertained. The privileges assigned to this account should subsequently be adjusted as appropriate.</p>	<p><i>Database Administrator:</i> The administrator account has been disabled. Complete.</p>	<p>No further response required.</p>
<p>A review of the logins assigned to the dbo_owner role should be undertaken. Changes should subsequently be made as appropriate to ensure that only those with a genuine operational need retain this level of privilege and that the correct domain account for each Application Support user is used where administrative privileges are to be retained.</p>	<p><i>Database Administrator:</i> A review has been performed and three logins have been removed (mis_service, ActiveHUser and cpritchard). It was confirmed that the other members are necessary for administering the application. Complete.</p>	<p>No further response required.</p>

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<p>The privileges and permissions provided to the ActiveHGRP database role should be confirmed. The risk associated with users being inappropriately assigned to this role should subsequently be assessed. If the risk is deemed sufficient to require review, the domain and SQL Server-level accounts assigned to the role should be reviewed to ensure that only current members of staff and other authorised accounts remain assigned to the role. The review should include membership of all domain groups assigned to the role, including through nested domain groups such as WARWICKDC\engineers, which is assigned to the WARWICKDC\Housing ActiveH Access domain group.</p>	<p><i>Application Support Manager:</i> An assessment of the risk has been completed and it has been deemed sufficient to require a review of the accounts assigned to the role, including the nested domain groups. This review has commenced, but will take some time due to the number of accounts involved. Feb 2013.</p>	<p>The nested AD group has been collapsed. The AD group (with database access) now only contains a list of individual users rather than group names.</p>

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<p>The use of the audit logging function should be reviewed to ensure that the tables being logged are of use to management and the system administrators.</p>	<p><i>Business Manager:</i> Agreed. The use of the audit logging function will be reviewed accordingly. April 2013.</p>	<p>We have reviewed the audit logging function and have also sought further advice from our Business Analyst in ICT.</p> <p>There are seven database tables that are currently being logged and these are contact details, contact group contracts, contact group details, contact groups, repair documents, asset adaptations and shared addresses. These are in addition to the rent account table that is logged by default.</p> <p>We have concluded that it is necessary to maintain the logging of these database tables as they involve auditing changes to the contact information for our tenants and to the repair documents that are fundamental to the payments process.</p> <p>ICT have also advised that we do not routinely have to look at the logs as they are primarily there in case something goes wrong.</p>

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Private Sector Housing Grants – 31 December 2012		
A formal method should be established for the charging of fees for each grant, with documentation being subsequently included in grant files to show how the figure for each grant has been calculated.	<p><i>Divisional Environmental Health Officer:</i></p> <p>A formal review of the charging policy on all grant and loan programmes is planned for January to May 2013. June 2013.</p>	We have reviewed the charging policy as part of the Service Redesign of Housing and Property Services. We have agreed in principle to charge a realistic fee for the advice, support and supervision officers give on grant aided works. This will be introduced following Executive approval in April 2014.
Efforts should be made to ensure that all relevant documentation is placed on file.	<p><i>Divisional Environmental Health Officer:</i></p> <p>The importance of file documentation and management will be emphasised in writing to all staff and monitored by random quality assurance checks. January 2013.</p>	We have written to all staff about the importance of file documentation. We have carried out a management audit of a 10% file sample for completed cases carried out Nov 2013 to ensure compliance. These will be on-going.
Supporting People Services – 19 December 2012		
The risks pertaining to the practice of temporary homeless placements in guest rooms at very sheltered schemes should be considered as part of the next review of the Operational Risk Register, along with possible mitigation measures.	<p><i>Head of Housing and Property Services:</i></p> <p>In post-audit discussion with the Business Manager, it was advised that this issue has been taken on board as a causal element in the recent major review of the Operational Risk Register for Housing and Property Services. Complete.</p>	No further response required.

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Subject to clarification on requirements from the Commissioning Body and/or Warwickshire County Council as appropriate, arrangements should be put in place for staff training on understanding and dealing with dementia.	<i>Supporting People Services Manager:</i> Dementia Training is being arranged with the Care Bureau for all staff during March and April, 2013. April, 2013 – Completion end of May 2013.	Dementia Awareness training has been undertaken by Sustaining Tenancies staff on 11/4/13 & 29/4/13
The Support Manual should be reviewed and revised as necessary.	<i>Supporting People Services Manager:</i> Support manual already under review. 31 July 2013.	Housing and Property Services have a new Sustaining Tenancies Manager in post who will review and revise the support manual as necessary by 31/12/13 as agreed with Richard Barr.
Public Conveniences – 12 December 2012		
The cost of servicing the hand dryer in St Peter's car park should be allocated to the correct cost centre.	<i>Senior Contract Officer:</i> Senior Contract Officer has passed recommendation to Property Services to ensure the servicing of the hand dryer in St Peters is charged to the correct budget code. Immediate.	No further response required.

IMPLEMENTATION POSITION OF HIGH RISK RECOMMENDATIONS
ISSUED QUARTER 1 2013/14

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE incl. PLANNED IMPLEMENTATION DATE	CURRENT STATE OF IMPLEMENTATION PER MANAGER
Catering Concessions – 22 May 2013		
<p>Concerted and appropriate efforts should be made to resolve the situation concerning the outstanding debts due to the council from Kudos.</p>	<p><i>Head of Cultural Services / Business Support Officer:</i></p> <p>Meeting held 2nd Aug with Kudos representative, Head of CS and Business Support Officer. Detailed discussion on principles for future calculation re utilities and service charges and clarification on outstanding invoice queries. Resolved queries, now in process of re-issuing amended invoices.</p> <p>Prior to the above meeting a one off payment of £50,000 had been received from Kudos. This has been offset against outstanding payments.</p> <p>Payment owed to WDC by Kudos as at 7th Aug 2013 is estimated to be between £10,000 and £15,000; to be confirmed on agreement of April – June sales figures.</p> <p>Members may like to note that under the terms of the contract with Kudos, The Council holds a £22,000 deposit from Kudos that if necessary could be used to cover outstanding debts.</p> <p>Immediate.</p>	<p>Further meeting held in Sept 2013 with Kudos Director that confirmed the principles of bill (see action below) and lead to agreement on outstanding monies due to WDC.</p> <p>Position @ 21st November 2013 – 2 invoices now overdue by 2 weeks (total £30,832.22).</p>

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<p>In future, invoices for service charges and commission should be raised regularly every quarter.</p>	<p><i>Business Support Officer:</i> Confirmation of principle for calculation (see above); quarterly invoices to be raised as per contract. Oct 2013 (Q2).</p>	<p>Principles for invoicing agreed with Kudos in Aug and confirmed at meeting with Kudos Director in Sept.</p>
<p>Local Land Charges – 19 June 2013</p>		
<p>A fundamental review of the Local Land Charges fee structure should be undertaken, with appropriate legal advice, to bring it into line with national regulations and government guidelines.</p>	<p><i>Head of Development Services/ Head of Finance:</i> <u>From Head of Finance:</u> Agreed – fees need to be fundamentally reviewed ahead of 2014/15 Fees & Charges setting. <u>From Head of Development Services:</u> Fee comparison with other authorities necessary. Full searches need to be competitive in cost against personal searches with income breaking even. Fees to be reviewed ahead of 2014/15 Fees and charges setting. October 2013.</p>	<p><u>Head of Finance</u> The basis for the charges recently agreed for 2014/15 in October are based on a break-even forecast in line with the Regulations. <u>Head of Development Services</u> Comparisons on fees of other authorities in the sub-region was undertaken to find that WDC was significantly higher on fees than all our neighbours. We have analysed the fee to ensure that we are close to being cost neutral, which results in a fee reduction from £145 to £95.</p>

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<p>Checks should be undertaken to ensure that all future submissions to Executive for approval of fees and charges completely and correctly represent the Local Land Charges fee structure (where this included).</p>	<p><i>Head of Development Services/ Head of Finance:</i></p> <p><i>From Head of Finance:</i> Agreed - Head of Development Services to advise the correct charges, with a view to clarifying them in the August Budget Review report.</p> <p><i>From Head of Development Services:</i> Correct charges to be clarified in the August Budget Review report. End of August 2013.</p>	<p><i>Head of Finance</i></p> <p>The basis for the charges recently agreed for 2014/15 in October are based on a break-even forecast in line with the Regulations.</p> <p><i>Head of Development Services</i> New fee will be set for 2014/15.</p>
<p>Information required under Section 9 of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 in respect of the financial year ended 31st March 2012 should be published without delay.</p>	<p><i>Head of Development Services/ Head of Finance:</i></p> <p><i>From Head of Finance:</i> Agreed – Development Services to supply information for this to be done.</p> <p><i>From Head of Development Services:</i> Information to be published on website. End of June 2013.</p>	<p><i>Head of Finance / Head of Development Services</i></p> <p>Details in respect of 2012/13 are now on the Council’s website.</p>

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<p>Arrangements for publication of information required under Section 9 of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 should be reviewed to ensure that results in respect of every financial year from 2012/3 onwards are promptly published.</p>	<p><i>Head of Development Services/ Head of Finance:</i></p> <p><u>From Head of Finance:</u> Agreed – Development Services to supply information for this to be done before end of June (to comply with statutory requirements).</p> <p><u>From Head of Development Services:</u> Information to be published on website.</p> <p>End of June 2013.</p>	<p><u>Head of Finance / Head of Development Services</u></p> <p>Details in respect of 2012/13 are now on the Council’s website, with plans in place to publish future years.</p>