Item 6 Appendix 3

Current Implementation Position for Recommendations Due for Completion by End of Quarter 3 2023/24

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE	TARGET DATE	TARGET DATE REVISED?	CURRENT STATE OF IMPLEMENTATION PER MANAGER
Bereavement Services (2022/23 Audit)				

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Mandatory training should be given to all staff, as outlined in the training matrix.	Timescales for this will vary depending on the individual needs of the member of staff and the availability of courses or internal facilitator.	31 October 2023	Yes – revised to March 2024.	Two colleagues required cremator training. One passed the course on 17 September 2023. The second colleague will start the training in the new year with completion anticipated by end of March 2024. It would not have been possible to complete the cremator training for both colleagues by the original deadline. (BSAM) As at 08/11/23, 80% of all bereavement staff are qualified. To maintain robust service provision under "business as usual" conditions, including holiday and sickness cover, 30% is adequate. Qualifications are included as essential criteria in job descriptions and on the training matrix, timescales to achieve qualification are dependent upon normal job role. Jobs are career graded with this qualification representing a grade boundary milestone. (BSDM)		
Electoral Registration (2022)	Electoral Registration (2022/23 Audit)					
The price charged to the credit reference agencies should be reviewed to ensure that it still	This can be reviewed during the next electoral canvass.	October 2023	Not applicable.	Recommendation completed - fees charged are based on the Electoral Commission fees and guidance.		

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meets the costs of providing the copies of the register.				
Housing Investment & Maint	enance Programmes (2021/22 Audi	it)		
A service-specific risk register for Asset Management should be created at the earliest opportunity.	 Original: Being developed alongside SDC Property Team. Update – August 2022: Following the ending of the merger discussions with SDC this now reverts to an Assets issue although with the addition of Bereavement Services and internal health and safety and proposals to create a wider service with former Neighbourhood Services this is now a wider piece of work and will be completed by end 2022. Update – January 2023: The Premises Manager is now working on an update to cover the newly formed Neighbourhood and Assets' service area. This is due to be completed by the end of March 2023. Update – May 2023: Needs to be as part of new service planning framework and across Neighbourhood and Assets. The task 	October 2023 (Previous target dates of April and December 2022 and, March 2023)	Yes – but within this same reporting period.	Initial Response – October 2023: The results of the Pennington's report need to be reflected in the register, so an extra month will be needed to complete the action. Updated Response: A risk register, covering the Neighbourhood and Assets Service Area has now been completed.

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Allocations, Nominations an	 was allocated to a member of staff who has now left. This will become the responsibility of the new Health and Safety and Premises Manager being recruited who will lead across the service. d Lettings (2022/23 Audit)			
The Housing Needs Risk Assessment should be updated.	Original: Agreed. Updates - August 2023: There have been discussions regarding the need for separate risk assessments for the different types of housing visits, with the decision taken that there only needs to be one. There is a Landlord Services risk assessment that is still within the review period, although this still makes reference to visits during COVID so needs to be updated accordingly. However, the reviewing officer is currently unavailable so this has been left with her line manager (Landlord Operations Manager) to follow up. Subsequent discussion with the Landlord Operations Manager confirmed that he had now been assigned as the reviewer for the	October 2023 (Previous target date of April 2023)	Yes – revised to March 2024.	The risk assessment that was previously in place related to visits during COVID and is no longer applicable. Another risk assessment in place for visits performed by a different Housing team (Lifeline) will either be adapted to make it applicable for all Housing staff performing visits (following discussion with the member of staff `responsible' for this assessment) or a new one will be drawn up for the relevant Housing officers.

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	relevant risk but did not have the relevant access to AssessNet to enable him to update the assessment. This was to be flagged with the Health and Safety and Premises Manager. Update – November 2023: The Landlord Operations Manager and the Housing Needs Manager have sought access to AssessNet and have also requested training via the Health & Safety and Premises Manager so that the Risk Assessment can be reviewed and updated. They are awaiting a response from The Health & Safety and Premises Manager so it's difficult to advise of a new target date. However, it is appreciated that this has been outstanding for a while and the		KEVISED?	
	Housing Needs Manager is keen to complete this action as quickly as possible. He is hopeful to be able to complete by end of the month but I am reliant on access and training to be provided.			
Banking Arrangements	be provided.			

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The risk register should be reviewed to ensure the information is up to date and that the controls and mitigations in place relate to the risk identified.	This is on the risk register with a low likelihood but high potential impact. The CiA system is Cloud-based, and while reliable to date, could be subject to an extended loss of internet and web connections, which could also affect the web-based bank system, with a consequent period that suppliers could not be paid. The risk register will be reviewed in October and then frequently on a quarterly basis to ensure risks and mitigations are relevant.	October 2023.	Yes – revised to March 2024.	Due to the ongoing external audit and other workload pressures this review hasn't taken place and will have to be deferred until the consideration of the 2024/25 Annual Treasury Management Strategy Statement report to Council, to be approved by 31 March 2024.
The additional resource requirements should be considered as part of the procurement exercise.	The Council invested a considerable staff resource in setting up the bank interface with the current bank provider. All this work would have to be repeated if there was to be the change in bank provider, which is a major project due to the importance of this interface. Also, the Accountancy team does not have capacity to undertake the tender exercise to obtain banking quotes, requiring external resources. This is to be discussed with the Procurement Team soon to discuss options.	October 2023.	Not applicable.	Following a meeting with Procurement it has been agreed to meet with HSBC in January to discuss a 2-year extension to the banking contract to February 2027, to enable Crown Commercial Services to complete work on a new banking framework, which the Council may be able to use once ready.

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Ethical procurement aspects should be considered in the risk register.	The Council's investment counter- party criteria identifies countries that the Council is happy to accept, and the Council's bank provider would be a UK-based subsidiary or company. The risk register will be reviewed in October and then on a quarterly basis.	October 2023.	Yes – revised to March 2024.	Due to the ongoing external audit and other workload pressures this review hasn't taken place and will have to be deferred until the consideration of the 2024/25 Annual Treasury Management Strategy Statement report to Council, to be approved by 31 March 2024.
Grounds Maintenance				
The contractor should be reminded of their contractual obligation to provide a statement of annual account to the Council at the beginning of each financial year.	Agreed to implement. Will be discussed at next managers meeting with IDVERDE.	End of October 2023.	Yes – revised to January 2024.	Not yet raised. This will be discussed in the Partnership meeting in the new year.
Change Management (2022/	23 Audit)			
The Council should ensure that every change request is recorded with the NetSupport ServiceDesk system, regardless of its source (including changes related to cloud-hosted systems) and priority / category.	Agreed – this will be addressed as part of reviewing the Change Management Process.	3 November 2023	Not applicable.	Whilst the formal revisions to the change management policy have not been made, all changes are now being recorded within the Council's service desk software. This recommendation can be marked as completed.

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The Change Management Policy should be reviewed as soon as possible and at regular intervals thereafter.	The Change Management policy does require a review as it was last looked at when we were merging. We will review the policy in context of best practice and bring this back to SLT for approval.	3 November 2023	Yes – revised to February 2024.	Updates to the Change Management Policy have not been completed yet due to resourcing limitations within Customer and Digital Services. However, work toward a revised Change Control process is underway and will be completed shortly.
The Council should implement a formal Change Advisory Board, ensuring that it has an agreed Terms of Reference, representation from across all Council service areas and documented roles and responsibilities. The CAB meetings should be held on a regular basis ideally (for example, quarterly), but at least on an extraordinary basis depending on amount of change backlogs.	A fully dedicated change advisory board many not be possible for the organisation, purely down to the amount of time and resource that would be needed. However, there is a need for greater accountability and visibility of change management processes, particularly for higher profile changes which hold greater risk. As such, the functions of a CAB could be integrated with a reformed ICT Steering Group.	3 November 2023	Yes – revised to February 2024.	Work towards implementing a change advisory board has not been completed yet due to resourcing limitations within Customer and Digital Services. However, work is progressing and will be completed imminently.
The Council should implement a process whereby improved change request monitoring reporting is designed and implemented. These might include (but not be limited to) the following: • Aging of change requests broken down into regressive	Agreed – this will be addressed as part of reviewing the Change Management Process.	3 November 2023	Yes – revised to February 2024.	Updates to the Change Management Policy have not been completed yet due to resourcing limitations within Customer and Digital Services. However, work is progressing and a revised change reporting process will be completed.

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 time periods, to detect change records that have exceeded specific KPIs in this respect. New changes for specific time periods. Resource time allocations to changes, to detect allocation overruns where changes are more challenging to implement. Change request age (the time between the initial record being raised to the request being closed). Changes awaiting approval. All these examples will require agreed KPIs or other suitable metrics for them to be adding value to the service. 				
The Council should update the email template used (to have the business authorise the next steps in the change cycle) to include an explicit option for having the service area confirm that their business process documentation has been updated as required and that relevant training on the new processes has been delivered.	Agreed – this will be addressed as part of reviewing the Change Management Process.	3 November 2023	Yes – revised to February 2024.	This was agreed to be updated as part of the review for the change management process. Unfortunately this review has not been completed yet due to other pressures within the service. It will be completed as soon as possible.

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The Council should document an appropriate data retention policy covering the data processed by the system. Alternatively, a Data Protection Impact Assessment should be undertaken on ServiceDesk to analyse the potential data processing risks associated with the system.	Most of the information retained within Change Control records does not detail individuals – other than the details required to process changes, such as an authorising managers name and email. As such, the privacy impact of our data retention is minimal. However, it is appropriate that information is not kept in perpetuity, particularly when systems are decommissioned and never reused. This will be addressed as part of reviewing the Change Management Process.	3 November 2023	Yes – revised to February 2024.	Updates to the Change Management Policy have not been completed yet due to resourcing limitations within Customer and Digital Services. However, work is progressing and a DPIA for the Change Control process will be completed.
Human Resources Manageme	ent			
Staff should be reminded to include policy change dates on the policies uploaded to the Intranet.	Agreed. Staff to be reminded at next team meeting.	Completed at the time of the final report being issued.		
CIVICA APP Application (202	2/23 Audit)			
An appropriate change authorisation process should be followed and adopted in all cases.	Following a more general audit of change management processes, change management as a whole is being looked into by ICT. This will include provisions for changes made within applications, methods of recording and authorisation processes.	3 November 2023	Not applicable.	A new change log has been created for CIVICA APP for admins to update and log all changes made. This has been stored and saved in the Systems Team folder.

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	It would be recommended that a common change management process is adopted rather than each service area creating its own approach, with the level of information recorded depending on the impact that the change being undertaken could have. This will be fed into other departments once the policy is updated and approved.			
The Information Governance Manager should be contacted to discuss whether there is a need for a specific DPIA for the CIVICA APP system or whether the departmental record is sufficient.	A discussion will be held with the Information Governance Manager as suggested.	December 2023.	Yes – revised to January 2024.	The Information Governance Manager (IGM) was contacted to discuss this further and a meeting was held to create the DPIA for CIVICA APP. A draft DPIA was created and circulated for comments from the Head of Service, other Team Leaders and users of the system. These comments were due to be reviewed and added to the DPIA, however the IGM left, so handover notes were written to ensure that the new IGM discussed the issue with the Systems and Service Support Team Leader (SSSTL) to finalise the DPIA. The appointment of the new IGM was awaited for this to be discussed, although this may be doable with the interim manager.

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				The SSSTL advised that, as the DPIA is nearly complete, he didn't anticipate the completion taking long, so suggested that the target date be revised to the end of January.
The current password controls for the system should be reviewed and updated in line with the Council's policy as far as is possible. The password history (reuse limit) should also be increased (ideally to 22 or more.) Alternatively, the feasibility of linking the application to Active Directory via a Single Sign On process could be reviewed. Doing so will remove the need to set a local password policy within the application as this will be superseded by the Active Directory user login and related password policy.	The password settings will be reviewed in line with the requirements of the new policy once adopted. Application Support staff have checked CIVICA with regards to Single Sign On with APP and have confirmed that it's not possible with the current version used. This 'capability' is something that will be considered as part of the specification for the replacement system.	December 2023.	Not applicable.	The password history (reuse limit) has now been increased to 22.
Business processes related to the management of the interfaces with the CIVICA APP application should be formally documented with regular	When renewing the CIVICA contract, it has been agreed with the Community Safety and Civil Contingencies Manager that a review and progress report of the APP should be done every six months -	December 2023.	Not applicable.	A review meeting was held in December, with meetings set for every six months (whilst the system is still in use) between the SSSTL and the Community Safety and Civil Contingencies Manager.

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reviews being scheduled once they are in place.	the first of which should fall in December.			The SSSTL advised that the documentation includes a look at user numbers, system issues, system output, issues and resolutions (e.g. how, why etc.) and targets, along with a link to the new change management log.	
Local Elections					
To ensure that the costs are in line with contracted amounts, and to promote successful monitoring of budgets and spending, purchase orders should be registered on contract when there is a contract in place.	The contract will be identified on any supporting payment requests / PO's and officers will be reminded to link spending to the appropriate contract when there is one in place.	Completed at the time of the final report being issued.			
Void Management					
Staff should be reminded to upload all evidence to the DMS.	Agreed.	End of November 2023	No response received.	This is being done.	
In line with the abandonment procedure, staff should be reminded to speak to neighbours and next of kin where possible, to gather information regarding tenant whereabouts.	Agreed - to be brought up in next team meeting.	End of November 2023	Not applicable.	Team briefed to speak to neighbours, next of kin etc. about tenants whereabouts in cases of suspected abandonment.	

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Staff should be reminded to issue seven-day letters to all abandoned properties.	Agreed - to be brought up in next team meeting.	End of November 2023	Not applicable.	Team briefed to remind them of the need to ensure seven-day letters are promptly issued in these cases.
Payroll and Staff Expenses (2	2022/23 Audit)			
The HR Handbook should be reviewed, and irrelevant documentation should either be updated or discarded where appropriate.	Agreed to implement – streamlining the HR Handbook is an ongoing project. This will be done in line with the new Intranet platform.	December 2023.	Not applicable.	HR Handbook updates for Payroll and Staff expenses completed as per move to new intranet and updates to I Trent system.
Corporate Health and Safety	(2022/23 Audit)			
The health and safety section of the code of conduct should be reviewed to incorporate relevant hybrid health and safety concerns.	The agile working policy is currently being reviewed, once completed and approved the code of conduct will be updated to be brought in line with it.	December 2023.	Yes – revised to June 2024.	Agile Working Guidelines completed March 2023. The Code of Conduct is being reviewed in line with other Governance areas with the Head of Governance, with the completion due for June 2024.
Microsoft 365 (2021/22 Aud	it)			
Management should ensure the timely completion of work to implement processes that incorporate immutable backups as part of the existing backup procedures already in place.	Original: Immutable backups are being considered as part of our cyber- resilience mitigation actions in conjunction with DLUHC. Update - April 2023: The ICT team has investigated the introduction of immutable backups for Office 365 content and at present, this is very problematic.	December 2023 (Previous target date of 31 March 2023)	Not applicable.	Work has been undertaken to ensure that immutable backups exist. ICT downloads key data to tape for offline storage. This air-gapped mechanism provides a means of ensuring immutability.

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	The use of Office 365 storage, be that through Teams or OneDrive is not corporately structured yet and whilst some use is being made of the facilities, this is not consistent. Most teams and individuals are still utilising our on-premise SAN storage. In addition, our current backup solution was primarily designed for on-premise usage so adapting this to fit with an online service is difficult. However, ICT's Service Plan for 2023-24 will include a programme to			
	migrate user and service data into Office 365 and a backup solution will be required. The immutability of the backups will be considered at this point. It is expected that our migration will take place in six to nine months' time. This recommendation should be kept			
	open until an immutable backup solution has been introduced.			
The Security Incident Management Policy, Change Management Policy and System Lockdown Policy should be reviewed to ensure that they remain compliant with Council requirements.	Original: A review of all ICT Policies is already underway. This was delayed during the merger process as many of our policies would have required integration with SDC, but this is no longer an obstacle.	22 December 2023 (Previous target date of June 2023)	Yes – revised to May 2024.	The security incident management policy and lockdown policy have been reviewed and are now being integrated into a new Cyber Incident Management Policy. Rather than existing as policies within their own right, they will be represented as

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	Update – August 2023: The Policy Reviews indicated have not yet been completed due to resourcing constraints within ICT and the demand for resources in projects. This will however be concluded in Q3 2023/24 with a revised target date of 22/12/2023. Revised policies will be passed to SLT for approval until the ICT Steering Group is reformed.			Action Cards, within an overarching framework. This is currently being reviewed by the ICT Cyber Group and our Emergency Planning lead. The revised CIMP will be passed to SLT for consideration shortly and is also required for our Cyber Audit. The Change Management Policy was given a light-touch review, but is now being modified in a much fuller way to incorporate software change management in a wider corporate context. Work has been slow going due to the lack of resource within ICT to dedicate to the reviews, whilst accommodating the office move and other workstreams.

Planning Policy (2022/23 Audit)

The Service Area Lone-Worker Policy should be updated.	Original: The current lone worker policy remains largely relevant; however, it would benefit from being updated as it was prepared prior to the pandemic, when most staff were office-based for most of the time. Update – March 2023: As per the Audit in December I committed to reviewing/updating the lone worker policy for the policy	December 2023 (Previous target dates of March and June 2023)	No response received.
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	 team. We indicated that we would look to do that by the end of March. However, owing to other pressing matters and the need to take annual leave before the end of the financial year this has not yet been possible. We have had a major consultation on the South Warwickshire Local Plan, I have led public examination hearings for the Council this month on the Net Zero Carbon DPD and I have been busy recruiting and then helping new staff settle in to the organisation (amongst lots of other things!). I do appreciate this is a priority but want to ensure I can commit the appropriate time to reviewing the corporate policy, what we currently have and what my colleagues in Development Management have in place. Therefore, I am requesting that I could have a bit longer to produce this – preferably a couple of months. Could we say 1st June 	DATE		IMPLEMENTATION PER MANAGER
	please? I will be on leave for 2 weeks after this week and will no doubt have a mountain of work to get through upon my return before I can focus on tasks including this.			

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	In the meantime new starters are being told about the procedures for going on site and I have recently ensured our ICE information for my team is up-to-date, including for new starters. Update - July 2023: I have been unable to prioritise this owing to an extremely heavy workload. It remains on my long to- do list. Will be completed by end of 2023 - this feels appropriate given that it has a 'Low' rating.			
Health and Safety Compliand	e of Council Buildings (2022/23 Aud	dit)		
Council properties with non- housing tenants should be providing the relevant documentation to comply with legislation such as the Fire safety order 2005.	Original: There is an identified need to request and review compliance documentation from non-housing/ commercial tenants, although limited resource has only allowed for an intermittent approach to requesting this data and subsequently managing it. It is intended to review this as part of a review of the Neighbourhood and Assets team restructure during 2023. Update – August 2023:	December 2023 (Previous target date of July 2023)	Yes – revised to December 2024.	In Autumn 2023 Neighbourhood & Assets Services commissioned an external audit on regulatory compliance for Housing stock. That report identified several areas for development and, as such, an action plan has been produced to address these recommendations. Much of the work identified and now being undertaken is relevant and inherently linked to Council properties with non- housing tenants and the recommendation made. I would therefore, request that this specific
	The admin resources required for this to be actioned will be picked up			recommendation 'due date' be brought in line with the Housing

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	under the restructure which is still ongoing.			Compliance action plan and changed to 'End of December 2024'.
Employee Attendance Manag	ement			
Where an officer is absent, there should be effective communication with teams regarding short term (or long term) changes in hierarchy and expected workloads.	To add to policy:' If a member of staff or manager is off sick the line manager should ensure that relevant staff are informed of any changes in reporting procedures or other temporary changes to workloads.'	December 2023.	Not applicable.	The policy has been updated accordingly.
The role of managers should be included in the policy in regard to their responsibility for uploading and storing information and documents regarding attendance.	Policy to be updated to include this.	December 2023.	Not applicable.	The policy has been updated accordingly.
VAT Accounting			1	
A timetable of VAT tasks should be developed and progress regularly reviewed by the Strategic Finance Manager.	Timetable to be produced annually in line with the Finance report timetable.	December 2023.	Yes – revised to April 2024.	This has not yet been actioned due to workload issues and, as we are nearly at financial year end, there is currently not time to action this. The Strategic Finance Manager suggested that he needs to find time for the Assistant Accountant to complete this task.

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Treasury Management (2022	2/23 Audit)			
The Treasury Management Practice documents should be reviewed to ensure that they are complete and up to date.	 Original: The TMPs will be reviewed as soon as time permits. Update - April 2023: These have been significantly rewritten but need the S151 Officer to review a number of points Once comments have been received, time will be needed to amend the documents accordingly. Update - October 2023 The Strategic Finance Manager and the Principal Accountant will arrange a meeting with the Head of Finance soon about the updated Treasury Management Practices that were drawn up in February, as he needs to agree what has been said as the S151 Officer's responsibilities are based on the CIPFA recommendations. It has never quite got to the top of priorities give the external audit situation, change of Council, etc. 	December 2023 (Previous target dates of March and September 2023)	Yes – revised to March 2024.	A Treasury Management Policy Statement was included in the Annual Treasury Management Strategy Statement 2023/24, at Appendix A, adopted by Council in March 2023. This statement will also be included in the Annual Treasury Management Strategy Statement 2024/25 currently being drafted for Cabinet on 6 March 2024 (for Council on 20 March 2024).

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GIS and NLPG						
Sample checking of data plotted by ICT staff should be undertaken by another member of the GIS team.	Increased checking of data to be undertaken; no formal software currently available to monitor data accuracy of inputting.	December 2023.	Not applicable.	This is now undertaken.		
All appropriate proposed names should be added to the approved street names list.	An additional list of "Inappropriate Street Names" will be incorporated into service.	December 2023.	Not applicable.	Any issues with street names are discussed and the spreadsheet is updated accordingly.		
Emergency Planning and Bus	iness Continuity Management (202	2/23 Audit)				
The Council's main Business Continuity Plan should be reviewed and bought up to date.	Original: The plan will be updated and brought in line with the recently-reviewed Emergency Management Plan. Update – November 2023: Can the completion date be change to the next quarter please. I wasn't aware the plan was being audited until after the due date.	December 2023 (Previous target date of September 2023)	Yes – revised to February 2024	The responsible officer was off sick for two weeks in December and was subsequently on leave for two weeks so will need a further four weeks to complete.		
Cloud Applications and Hosti	Cloud Applications and Hosting Contracts					
Procurement and ICT should agree on a process that allows all delivery options for new software solutions to be considered and fully evaluated.	ICT will work with the Procurement team to agree an appropriate process and ensure this is embedded within future projects for all software solutions.	December 2023.	Yes – revised to May 2024	Work with our procurement team to address this issue has not been completed due to staff availability and operational constraints. However, work is being picked up and this recommendation will be addressed by 31/05/2024		

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Documented procedures should be developed to support the Cloud Service Assessment Framework.	The CSAF as recognised in the audit is a relatively new document that has been introduced with the support of colleagues from Procurement. ICT will develop this further to establish formal procedures for evaluation and sign off, ensuring that all appropriate stakeholders are consulted.	December 2023.	Yes – revised to May 2024	ICT's Cyber Improvements Group has been tasked with redeveloping the Cloud Security Assessment questionnaire into a lighter format. Work is due for completion by 31/05/2024. This timescale is reflective of the resources available to the group.
A cloud security assessment should be integrated into the MMR and a shorter assessment should be developed for smaller cloud applications.	A lighter version of the CSAF will be prepared for smaller applications as recommended. In addition, a tailored version will be produced for inclusion with MMR documents.	December 2023.	Yes – revised to May 2024	