Audit Recommendation	Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update
1 Appendix One	Investigation into the Procurement and Manage	ement of Impart Links		
1.1 Whenever any major contract is due for renewal, the process for the retender and the procedures to be adopted should be appropriate to the nature and scale of the contract and the risks involved.	years on Procurement, formal and informal training, email reminders, items on the intranet, is taken to remind Budget Managers of the need to plan ahead	(1) Contract Register updated following discussions with Budget Managers. Instructions to be issued to SAMS.	MS	Meetings held with Service and contract managers to update contract register. Meetings have provided basis for discussions on procurement requirements, forthcoming tenders, training needs etc.
	update – Procurement, Orders, Invoices and Contract Management" sought to remind officers	(2) SAMS to confirm Contract Register accurate and provide regular updates.	SAMS	Updated Contracts Register being reviewed by Heads of Service. Instructions have again been issued to notify Procurement Team of any future changes.
	and ensure there is mutual understanding of forthcoming tender activity, and appropriate plans	(3) Budget Managers to plan all their procurement activity pro-actively in advance and discuss with Procurement Team.	Budget Managers	Discussed with Heads of Service and raised in SMT January and May 2014 reports. Plan of future procurement activity developing from Contracts Register updates.
	procurement activity and compliance/enforcement	(4) Monitor resource/impact on Procurement Team of greater emphasis on central co-ordination of procurement activity and compliance/enforcement.	Head of Finance	Procurement Team workload being assessed based on updated Contract Register, ensuring suitable involvement in all contract opportunities.

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1.2 Whenever a	The recent report to SMT (see above) reiterated	(5) Active contract	Budget	Contract Management training provided by
contractor or consultant is on site in a situation where work is ordered as required as the job progresses, there should be regular monitoring, forecasting and reporting of activity,	some of the basics in contract management.	(5) Active contract management (detailed components of not listed here).	Budget Managers	
progress, cost and				
performance.	The Budget Review process requires Budget Managers to monitor and forecast expenditure. This process is currently being strengthened by the introduction of additional cost centres, where appropriate, to isolate expenditure on specific contracts.	(6) Identify relevant Contract Management Training needs for individual officers.		Initial list of officers needing training identified as part of Contracts Register discussions and from Personal Development Plans. Training to be structured around Contract Management and Tender process/specifications.
	Investigations are currently underway with the system supplier on the use of job cost codes within the General Ledger to assess whether this will assist in contract management. The initial investigations are hoped to be completed by the end of April.	(7) Contract Management Training to be arranged and attended.	HR/Procur ement Team	
	be delivered during 2014/15. HR will be confirming dates shortly.	(8) Budget Managers and Accountants together to review each contract and how the contract spend is monitored against the contract, including how the relevant budget is held on Total, and review additional cost		Considered within May 2014 SMT report. Budget Managers responsible for monitoring contract spend. Accountants assisting/advising on most appropriate use of Total to assist with this.
		centre/codes required to assist manage contract budget more transparently. (9) Annual call off orders to be raised on Total for all contracts spanning full year.		Need for annual orders raised in May 2014 SMT report and within Order training.

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			Budget Managers	Officers informed within SMT reports and Order training.
financial management	An email reminder was issued in December to all Senior Officers setting out the correct Order Processing arrangements that they are required to follow.	can be changed and to confirm the definitive	Principal Accounta nt (Systems)/HoF	Amended orders need to be authroised, requiring involvement of 2 officers. Order limits for individual officers held within Total. Order training provided to all users of Total.
		training to be rolled out to all users of Total.	ICT Trainer/P A(System s)/SAMS	Intensive roll-out of Order training since April 2014, with courses to be provided on an on-going basis for new starters etc. On- line training being finalised.
Whenever it is declared or evident that a member of staff, be they permanent or agency, has an interest or association of any kind with any organisation that the council conducts business with, they should not be involved in any way with any aspects of dealing with them if at all practicable	Executive to SMT/Senior Officers of the requirement to declare all interests, gifts and hospitality. Heads of Service authorise gifts, hospitality and register of	teams of requirement to declare interests and have	SAMS	Heads of Service reminded with May and September SMT reports.

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	possible interests and these had highlighted DS' links to IL. A discussion will be held with SMT in March on the learning points from this case and how better records can be maintained to demonstrate the integrity of the Chinese Wall between employees making such a declaration and any relevant contractors.	Èmployee Code of Conduct.	Manager	Updated Code presented to September 2014 Employment Committee.
		Code of Corporate	Audit & Risk Manager	Audit & Risk Manager to update following completion of CIPFA Certificate in Corporate Governance in October.
	early December.	(16) Instructions over use and management of Comensura to be issued to all managers.	HR	After agreement with Alt SMT and a review of the control and processes within Comensura we HR are now in the process of training the HR support team and preparing narrative to SMT regarding how they plan to administer this, this will be completed by end November with relevant communication taking place between now and this time.
		(17) Active management of Comensura contract	HR	See 16.
	to the remuneration arrangements were included in the brief provided to WME who were conducting the	(18) Management information from Comensua to be issued to SAMS	HR/SAMS	See 16. HR to issue information.

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	HR are reviewing the terms of the Comensura contract with Procurement. Instructions are planned to be issued to officers on the operation and management of posts recruited through Comensura. The instructions will detail such aspects as, when it is appropriate to use, what the rates/oncosts are, how to manage the hours, expenses, dealing with extensions over the initial period.	agency staff employed.		Review has shown how use of agency staff has reduced from 34 in April 2014 to currently 19.
		(20) Changes to appointments agreed by CMT (VARF) to be confirmed by CMT.	CMT/SAM S	Part of 16.

	Audit Recommendation	Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update		
	2 Appendix Two Investigation into the Procurement and Management of One Stop Asbestos Consultants and Services Ltd Issues						
2.1	Contracts should be appropriately signed and entered into.	This issue was highlighted within the January report to SMT: 'Finance update – Procurement, Orders, Invoices and Contract Management'.	(21) Original signed contracts for all existing and new contracts in Contracts Register to be issued to Procurement, Departments to retain their own working copy.	SAMS	Requirement now for all signed copies to be held in Central Deeds Store. May SMT report reminded officers to retain their own management copies.		
		The Procurement Team have been working with Budget Managers to ensure compliance. The recent discussions with all Budget Managers, still on-going, have highlighted some further action that is needed and this is now being undertaken.			Instruction for signed contracts to be held in Central Deed Store issued. Need to cross reference contracts submitted with Contracts Register held by Procurement.		
		Copies of all new contracts are now held centrally with the Procurement Team, with the contract manager holding a duplicate working copy. This check has been introduced to ensure that in future all contracts are properly signed, correctly filed and accessible.	(23) Unsigned contracts to be signed, working with Legal/Procurement.	SAMS	H&PS actively progressing getting signed contracts in place with 5 of the 13 March 2013 now signed. Heads of Service reminded to ensure signed contracts are in place. Signed contracts in place for all contracts since August 2013.		
		It has already been established that a number of the major H&PS contracts, let under the Open Book Accounting method in April 2013 remain unsigned. Officers within Property Services, Procurement and Legal are currently reviewing the position in regard to these contracts and agreeing the process required to ensure they are regularised.	Recommendation Report" to be issued for all tenders		Requirement to be formalised within updated Code of Procurement Practice.		
		The Procurement Team are now ensuring that any new tender process includes a summary report that will be presented to the relevant Head of Service prior to signing the contract.		Procurem ent/SAMS	See 1.		

Audit Recommendation	Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update
be drawn up to make it clear what is and isn't expected to be covered by the prices	Requirement of clear tender specification. Procurement Team provide help/advice here, with further tender specification training planned. Procurement Team will challenge tender documentation, but it is the contracts managers who have knowledge of the services required to be specified.	(26) Tender/specification writing training needs assessment (see 6.)	SAMS/Pro curement Team	HR sourcing suitable providers. See 5.
		(27) Tender/specification writing training (see 7.)	HR/Procur ement Team	See 5.
2.3 Contracts / contractors should be appropriately managed. The relevant manager should familiarise themselves with the contract, enabling them to ensure that the contract is adhered to and payments are appropriate and are authorised accordingly.			Procurem ent	See 5. To be reviewed following update to Code of Procurement Practice and associated documents.

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				Procurem ent Manager/ Budget Managers	See 28.
	Legal advice should be sought regarding the current status of the 'contract' and the payments relating to the outstanding invoices and remaining contract period.	held with the contractor resulting in full and final settlement being agreed on 20 February 2014.	None.		
2.5	how the council meets its asbestos management, whether this is by the resumption of the contract or by	The Council intends to bring the management of its asbestos contracts 'in-house'. CMT have approved the recruitment of a specialist asbestos surveyor post to manage external contracts, 'own' the asbestos register, and programme survey and removal works. The post is initially being recruited via Commensura pending the Stage 2 redesign of the Asset Management team within H&PS when the intention will be to make this a permanent appointment.	None.		
		An OJEU compliant procurement exercise is underway to appoint a specialist asbestos contractor to undertake all survey and removal works.			
		In the meantime the current interim arrangements to enable responsive survey and removal works to be undertaken via the main repair and void contract will be strengthened to ensure the Asset Register is reviewed, updated and maintained on a timely basis and programmed surveys and removals resume. The February Executive approved an exemption to the CoPP to allow an experienced contractor to be appointed and this contract is now in place.			

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3	Appendix Three	Independent Audit Review of Selection of H&PS	Contractors		
	Issues				
3.1	The Head of Finance should arrange for a complete analysis to be undertaken of all payments to five named suppliers to provide assurance that all payments in respect of those contracts were examined during this audit.	This analysis will commence in April 2014, to be undertaken by a Senior Internal Auditor.	(30) Analysis completed and reported presented to Deputy Chief Executive. CMT to meet with relevant parties and future actions agreed.	DCE	
3.2	The Head of	Formal review and update of all Procurement	(31) Formal review and	Procurem	Documents being updated, aimed to go to
	Procurement should amend the CoPP to require decisions to extend contracts to be: - Subject to the same approval process that	documentation currently underway, bringing in the requirements of the Social Value Act and the changes to the EU Procurement Regulations recently issued. Changes to the Code will be presented to the Executive. This is to be a 2014/15 Service Plan activity for which the detailed milestones are yet to be determined. As part of recent discussions with Budget Managers, some potential new requests for extensions to	update of all procurement documentation to be	ent	SMT in October ahead of Executive in December.
	applied to the letting of the original contract and - Subject to a formal report that confirms	existing contracts have been identified, with appropriate actions, e.g. the need for a report to Executive to request an exemption from the CoPP as brought to the February Executive, agreed. Further reports will be brought to future Executive meetings if appropriate.			
	satisfactory performance of the supplier concerned.				

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3.3	develop detailed guidance regarding	the CoPP and all associated procurement documentation in line with new EU Regs, the Social Value Act and the Council's business requirements	(32) To be addressed as part of the review and update of the CoPP and all associated procurement documentation (see 31).	Procurem ent Manager	Code of Procurement Practice being updated to go to December 2014 Executive.
	methodologies to always be fully	The Procurement Team review all scoring matrices before agreeing a contract is let and ensure that this is in line with recognised best practice and recommend a contract can be signed by the relevant Head of Service.			
3.4	Manager should undertake detailed	together and it is expected that the findings will be	(33) Completed. Recommendations and findings to be addressed by H&PS.	H&PS	

	Audit Recommendation	Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update
3.5	During the above the Audit & Risk Manager should ensure that all relevant documents are provided for examination. Any contracts entered into with the firms concerned should be examined and a full evaluation of payments made should be undertaken.		As above, completed.		
	The Head of Procurement, in liaison with the Audit & Risk Manager should:	an exemption from the CoPP was approved by Executive in February. This has allowed PTL to be re- engaged in their previous role for a maximum period of 8 months. This timescale covers the OJEU tender period, allowing for any unanticipated slippage, and, potentially, a handover period to the new contractor if this is considered desirable.	agreed by Executive for the	H&PS	Following February 2014 report, further Exemption report to October 2014 Exec.
	that services are no	In respect of the second contractor, (Insuheat), all work has now stopped and no further orders will be placed with this company.			
	there is a need for	51	(35) Works ceased with Insuheat.		

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3.7		further top level review referred to below.	(36) Details relating to the letting of these contracts to be collated by H&PS. Once collated A&RM will provide to CAL to undertake review.		Review undertaken in March 2014 by Internal Audit and included as Appendix 6 within the March Executive report.
3.8	During the above the Audit & Risk Manager should ensure that: -All documents are provided for examination - Fully review all documents and, in liaison with the Deputy Chief Executive, decide whether either of the 2 contracts should be subjected to more detailed examinations around the contract extension criteria and quality/price scoring methodologies	To be covered in the above process.	See 36.		See 36.

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P In view of the findings of the top level review the Deputy Chief Executive, in liaison with the Audit & Risk Manager, should consider whether similar top level reviews should be undertaken of the processes associated with the letting of contracts to a further 8 named firms indicated as having received more than £100,000 inc VAT since 1/4/12	CAL Ltd. have been commissioned to undertake this further review.			
	manual records held within H&PS and it is	tender documentation from		Procurement data extracted from Delta and shared with Property Services.
	anticipate that this further review will identify any	· · ·	Asset Manager	Asset Manager collating contract documents held by Property Services. Officers in Housing and Property Services are assembling the information they hold for the contracts in question and anticipate completing this exercise by 31st October 2014.

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4.1	responsibility for entering into		(39) Training needs assessments. See 6 and 26.	SAMS	See 6 and 26.
		Despite this, it is clear that a renewed emphasis on procurement training is now required.			
		Current training needs being assessed to collate the procurement training being planned for 2014/15, as detailed in the main report.	. ,	HR/Procur ement	See 5, 6 and 26.

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4.2	Consider whether there is a need to introduce a requirement to fully inform and update the appropriate officer (Line Manager/Procurement Manager) as part of any future training interventions into procurement practice. Assess whether there be any benefit in adding an additional `checking layer` at Head of Finance , even if this is just to have an awareness of what contracts are being sought at the initial procurement	Training needs being assessed – see above.		HR/Procur ement	See 5, 6 and 26.
	stage	The current review of all procurement documentation (see above) will consider any need to review/change of procedures if necessary. Budget holders have responsibility to ensure their have adequate budget before commencing procurement activity, and planning their procurement activity in advance with the Procurement Team.	(42) Need for 1 2 1s and team meeting to consider procurement issues, ensuring managers are aware of any problems relating to contracts, current or potentially emerging.		SMT reminded as part of May 2014 SMT report.

Aud Recomme		Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update
4.3 Consider the the exercise additional s (within fair proper recru	e need for e of any scrutiny and uitment of potential where be s with ns who red with enders etc ouncil. This mething including ection on ication chrough ment	The Deputy Chief Executive (BH) has raised this issue directly with the interim HR Manager and current recruitment practices will be reviewed. Any appropriate revisions to current practices will be discussed with the relevant Portfolio Holders as per recommendation 2. 4 and, if necessary, reported to Executive as per recommendation 2.5	See earlier points re training and declarations of interests.		

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additional safeguards put in place to	Staffing budgets are ring-fenced and any proposal to vire from/to these budgets needs to be discussed and agreed with Finance. The Head of Finance will be issuing further instructions to budget managers on this issue during April.		HoF	Clarification discussed within Budget Review Report October 2014.
	5 1	Instructions re Commensura – see 16.	HR	
management support is provided to staff at all levels to include,	CMT have taken management action to ensure that those service areas currently operating without a Head of Service are directly managed by one of the Deputy Chief Executives, ensuring that regular 1-1s are held with relevant managers	(44) Review at 1 2 1s.	SAMS	SMT reminded as part of May 2014 SMT report.

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		(45) Review and update service risk registers for procurement risks.	SAMS	SMT reminded as part of May 2014 SMT report.
Reinforce the need for early clarity to be established by the Procurement Manager as to who exactly has the overall responsibility for a specific contract/tender and ensure that any future contractual/tender management reporting lines are stated clearly within the confines of the ITT or other appropriate contractual documentation	Plan and tendering process. This is being enforced	(46) Project plan to be in place for all procurement exercises.	SAMS	SMT reminded as part of May 2014 SMT report.

Audit Recommend	lation	Action Taken as reported in Appendix 5 of March 2014 Executive Report	Further actions identified	Owner	October 2014 Update
4.7 Review the role	e of the lanager it ding a hen r an	The Procurement Manager is strengthening existing procedures by both parties. This procurement Manager is strengthening existing procedures by introducing a 'Recommendation Report'. This will set out a summary of the procurement process followed, the evaluation of tenders (& PQQ where applicable) and make the final recommendation with reasons. This will need to be signed off and agreed by the project team and relevant Head of Service before a formal award is made. This new process follows procurement best practice and gives an opportunity for questions and clarification discussions to take place. The contract register will, in future, be part of the e.tendering system – Intend- where contract review dates can be applied to contracts linking the review back to suppliers and procurement. This will bring benefits for contract monitoring in the procurement function with tighter controls and ownership for both the supplier and WDC. As set out above, Contracts Management training will be included within the 2014/15 Procurement training programme.	(47) Review and reissue terms of reference/mission statement of Procurement function as part of review of all Procurement documentation (see 31) . This will clarify their role and responsibilities in procurement activities.	Procurem ent Manager	Part of current review of Code of Procurement Practice due to go to December Executive and associated documentation.