

## Appendix 4

### **Current Implementation Position for Recommendations Due for Completion by End of Quarter 4 2021/22**

RECOMMENDATIONS	INITIAL MANAGEMENT RESPONSE	TARGET DATE	TARGET DATE REVISED?	CURRENT STATE OF IMPLEMENTATION PER MANAGER
<b>Responding to Complaints &amp; FOI Requests</b>				
Service area managers should be aware of complaints within their area and manage them effectively to reduce the number of late responses.	CS Team to introduce monitoring reports of remedies and learning points. Quarterly report to JMT for conformation of work completed (similar process as audit reports)	From the next quarter then ongoing on a quarterly basis (Follow up at the end of Q4)	Not applicable.	Quarterly reports are now in place.
<b>Statutory Monitoring Functions</b>				
The Council should investigate entering into an arrangement with another local authority that operates a crematorium to perform joint visits to ensure that there is appropriate 'oversight' of the inspections undertaken.	Discussed with line manager the option to liaise with counterpart in Rugby who have agreed to provide 'peer review' by way of a reciprocal arrangement.	31st January 2022	Yes – revised to 30 June 2022	The position was checked with the Environmental Health and Licensing Manager who confirmed that she had received agreement from Rugby to be that support to us in this area of enforcement. However, due to resource issues in the team (maternity leave and extended periods of sickness) it has not yet progressed.

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Ensure that there is a consistent approach to the removal of environmental permits from the list held on the website where permits have been revoked or surrendered.	Environmental Protection Team Leader to advise the Senior Environmental Health Officer of this requirement and monitor through routine 1-2-1's.	31 March 2022	Yes – revised to 30 June 2022	The relevant officer has been on sick leave and is now on a phased return. A meeting has been scheduled for May 2022 to get this addressed.
<b>Leaseholder Service Charges</b>				
An income recovery process should be established and followed.	To create & implement procedure for management and recovery of leaseholder debt.	31 March 2022	Yes – revised to 31 July 2022	Awaiting input from Legal Services regarding recovery options surrounding first tier tribunals for procedure to be written.
<b>Corporate Training (20/21 Audit)</b>				
Corporate Training should continue to remind SMT and senior managers of the importance of recording the appraisal documents.	With the new Performance Module of the HR/Payroll system being implemented July 2021 this will form part of a more empowered service for Managers to monitor within their own teams	31st March 2022 (Previous target date of July 2021)	Not applicable.	The Appraisal annual email reminder will be sent in next two days* about the process updates for 2021/22 and the new processes tied into I Trent (* Response date 6 April 2022)
<b>Car Parking</b>				
The website should be updated to accurately reflect the approved charges and timeframes published in the Section 35 notice.	Website will be updated at the appropriate time.	January 2022	Not applicable.	All charges updated, hourly charging structure replaced and all prices and car parks are aligned to town centre prices as advised in latest increases.

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Parking information on the Ring-go application should accurately reflect the approved charges and timeframes published in the Section 35 notice.	Ring-go information to be updated accordingly.	January 2022	Not applicable.	The erroneous 12 minutes charge increment added by RingGo on a previous update has been removed.
<b>Corporate Property and Portfolio Management</b>				
When it is written into leases that the building insurance is to be provided by the tenant, proof should be obtained and evidenced to help protect the Council from losses.	The Senior Building Surveying Project Manager will check that the insurance held is valid and meets the level of insurance required. The Risk & Insurance Officer can provide guidance if needed.	1 March 2022	Not applicable.	We are in the process of contacting the few properties that undertake their own insurances in order to request their insurance documents. A new process is now in development that enables a Ripplestone report to be produced that automatically provides an overview of these properties and when the insurance is due for expiry. This will allow further contact to be programmed in. The Risk & Insurance Officer will check insurance documents provided to ensure that they are suitable & sufficient.

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<b>Housing Repairs and Maintenance</b>				
A review should be carried out to identify and initiate enforcement action on all outstanding recharges within the 6-year limitation period.	Policy & Procedure to be written and introduced following consultation with partners at Legal Services, that details arrears recovery relating to rechargeable repairs.	January 2022	Not applicable.	In consultation with partners, including Legal Services about what actions can be taken to recover non-payment.
Ripplestone reports should be modified to include the 'Urgent' job priority type.	Agreed – post is currently vacant but seeking to recruit in near future.	31st March 2022 (Previous target date of December 2021)	Not stated	The Data Coordinator post has now been filled and this can now be implemented.
<b>Information Governance</b>				
A review of relevant contracts should be performed where contractor staff have access to Riverside House or other relevant Council properties to ensure that appropriate reference is made to data security.	Contract managers will be asked to review their contracts to ensure that the need for data security has been appropriately considered in each case.	Initial: September 2021 Revised (Q2): December 2021 Revised (Q3): February 2022	Not applicable.	Heads of service have confirmed the position for all relevant contracts.

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A review of work-issued devices (such as mobile phones) should be performed to ensure that they are suitable for the work now being performed at home (or other 'off-site' locations).	ICT Steering Group will be asked to perform a review of devices currently in use and to identify the resourcing implications of providing replacement devices where necessary.	31st March 2022 (Previous target date of September 2021)	Not applicable.	<p>The ICT Steering Group was disbanded in 2021 and combined with the Transformation Steering Group.</p> <p>In response to the COVID 19 Pandemic, ICT comprehensively reviewed the devices it issued to staff, switching to a standard setup of laptop, dual screens (where needed) dock, camera and headset in the office. Staff working from home were offered the same equipment when they were sent off-site for COVID and recently, ICT has refreshed certain elements of this.</p> <p>The concern raised in the audit that staff may not be able to deal with data securely can be fully addressed. All laptops are encrypted, all network traffic is via a secure VPN and all mobile devices are secured at the application level. Staff are also provided with headsets to ensure the privacy of conversations and are frequently reminded of their information governance responsibilities.</p>

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<b>Cyber Security (20/21 Audit)</b>				
A formal Network Monitoring Policy and supporting operational procedures should be documented. The policy should set out the scope of the monitoring activity; for example, specifying the infrastructure logs that are relevant, roles and responsibilities and the reporting and follow up processes needing to be carried out.	ICT can review its network monitoring and logging processes in line with the latest guidance from NCSC. An appropriate policy and process will be produced for consideration by the ICT Steering Group.	31st March 2022 (Previous target date of September 2021)	Not applicable.	ICT have started to develop a network monitoring process, but this is a continual cycle of development. We've taken the basic guidance issued by the NCSC regarding monitoring and logging and have adapted this for our environment. We've also invested in training one of our staff formally on cyber security and have deployed the log-point application to enhance our monitoring facilities.

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Reviews should be conducted of the relevant Third-Party remote access policies, their related procedures and the remote working policy for staff and members. A regular review of the policies should be undertaken on an appropriately regular basis.	Several of ICT's key operational policies have not been reviewed according to the normal schedules, principally due to the impact of COVID-19 on capacity to carry out the work and the absence of key staff within the service. The Council's overall remote working and access policy requires a review to ensure that it takes account of the changed circumstances of WDC, where more staff are working remotely than ever before. A review of supplier remote access will also be undertaken to ensure that appropriate safeguards are in place and effective monitoring is operational.	31st March 2022 (Previous target date of September 2021)	Not applicable.	This recommendation in part has been superseded by the Council's merger workstreams. One such workstream relates to the harmonisation of ICT policies and processes. Many of the policies captured in this recommendation are in scope and are actively being reviewed. ICT is also beginning a process of risk evaluating its policies to better inform their required revision timescales. The monitoring of supplier remote access is also now being more effectively utilised as ICT has introduced a revised MFA requirement for suppliers and a new logging system.

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<b>Housing Investment and Maintenance Programmes</b>				
The Council should develop a robust procedure for dealing with instances where reasonable requests for access are refused. These cases should be escalated until remedial action has been completed and every effort should be made to recover the cost from the tenant.	Housing Services will consider as part of the tenancy agreement review and, if necessary, write and implement a procedure that covers access to our customers' homes. However, it must be noted that ultimately it is a legal obligation of any tenancy agreement that a tenant must have quiet enjoyment of their home, which means a Landlord cannot gain or try to obtain access unnecessarily or without good reason. A court order must be obtained and we would need to establish whether legal proceedings would be classed as abuse of process to carry out improvement works. Similarly, whether we would be able to charge tenant for refusing access is a difficult situation to assess. There may be very many reasons why we wouldn't want to charge, or even be successful if we did, in recovering any money, including how we could prove costs incurred for non-access.	March 2022	No response received.	