

ANNEX B *Summary of Outstanding Recommendations*

(Recommendation status as at 19.05.2022).

Essential Recommendations overdue

| Audit | Risk level | Summary of Recommendation | Target Date | Status |
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| ICT Light Touch Security | E | <p>A target date for CCC re-obtaining PSN certification is agreed and JMT is kept updated of progress towards this target.</p> <p>In view of management's comments on the draft report, we recommend two separate target dates be agreed:</p> <ul style="list-style-type: none">• One for the completion of an ITHC and the submission of an appropriate Remediation Plan to PSN (if needed). Perhaps the target for this could be August 2021• And the other target being for the completion of (at least the high priority elements of) the new Remediation Plan. We suggest this target date could be 3-6 months after the above. | 30/11/2021 | <p>The service conducted an initial ITHC (the first step in obtaining certification) in January 2022, and developed a Remediation Plan to rectify the issues identified in February 2022. A second ITHC is planned to take place in late June 2022, and once this is completed the service can re-apply for PSN certification in July.</p> <p>Revised target date: 31st July 2022</p> |

Recommendations overdue – under 3 months

| Audit | Risk level | Summary of Recommendation | Target Date | Status |
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| Dedicated Schools Grant - High Needs Block Demand Management | I | The service has indicated that there are already plans to review and update the Personal Budget policy. The service should ensure as part of this update that guidance is clear that where any provision is to be secured by a Personal Budget, Section J of the EHCP should include: details of how the Personal Budget will support particular outcomes; the specific provision it will be used for, including any flexibility in its usage; and the arrangements for any direct payments for education, health and social care. | 01/04/2022 | The service report that the target date for this work has had to be pushed back by two months. The policy is due to be reviewed by a new officer who started work in April. Revised target date: 30th June 2022 |
| Dedicated Schools Grant - High Needs Block Demand Management | I | The Quality Assurance Audit Framework should be revised to include checks to identify whether the provision outlined in each EHCP appears to be proportionate to the level of need, and to assess whether the funding allocated to the individual is appropriate. | 31/01/2022 | The recommendation has not been completed yet, as the review of the Quality Assurance framework will take longer to complete than previously estimated. This is due to widening the scope of the review, and the need to ensure consultation and co-production are fully included as part of the programme. The revised date for completion is the end of June 2022. Revised target date: 30th June 2022 |
| Interim Team Leader MID Investigation | I | The service should review all current contracts with interim workers and ensure that contracts include complete mechanisms for the Council to withhold payment in the event of late or absent delivery of | 31/01/2022 | The service has checked its current contract arrangements and verified that for interims within scope of IR35 and employed via OPUS, this mechanism is in place. There are members of |

| Audit | Risk level | Summary of Recommendation | Target Date | Status |
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| | | expected services. | | <p>staff outside the scope of IR35 or employed via other agencies and further work is now being undertaken to verify that mechanisms to withhold payment for late or absent delivery are in place in their contracts.</p> <p>Revised target date: 1st July 2022</p> |
| Interim Team Leader MID Investigation | I | The service should review all other interim arrangements currently in place and ensure that the Council has informed contracting agencies of its requirements regarding pre-employment checks and that appropriate assurances have been received that agencies have carried out checks in line with the Agency Workers & Interims Policy. | 31/01/2022 | <p>The service has now confirmed with all current recruiters what pre-employment checks are undertaken as part of their normal processes. There is still a requirement to obtain some specific documents directly for individual appointments and the service is now working on implementing this process and conducting checks on current interims.</p> <p>Revised target date: 1st July 2022</p> |
| Interim Team Leader MID Investigation | I | The service should conduct a review of the interims currently in post and calculate the mark-up currently being paid for each interim in excess of the full costs of the substantive post being covered. This should then be reviewed and challenged by the Executive Director of Place & Economy, Head of Procurement and Chief Finance Officer. | 31/01/2022 | <p>This action is underway. It has been agreed with Audit to produce a sample at different levels of seniority, rather than calculating the full mark up for each individual. This should help the service identify current average levels of mark up and work to identify outliers. Assumptions are being confirmed through Finance and HR and the target date for completion is now 1st July.</p> <p>Revised target date: 1st July 2022</p> |

| Audit | Risk level | Summary of Recommendation | Target Date | Status |
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| Declarations of Interest - Employees | H | The Council should identify key decision-making officer boards/group's where there is a risk of officers being involved in decisions where they may have an interest which could present a conflict and ensure that declarations at the start of the meeting and incorporated into the groups terms of reference. | 31/01/2022 | Internal Audit is awaiting an update from the service. Revised target date: TBC |

Summary of Outstanding Recommendations – over 3 months

| Audit | Risk level | Summary of Recommendation | Target Date | Status |
|--|------------|--|-------------|--|
| Dedicated Schools Grant - High Needs Block Demand Management | I | The Statutory Assessment Team should evaluate the annual review process and ensure that there is a control implemented (i.e. a checklist) within the annual review process that prompts the casework officers to check whether the details of the EHCP and particularly the funding allocated is still appropriate to meet the child/young person's needs. | 31/12/2021 | A new Project Manager has started work on the EHCP Improvement Plan; the Annual Review Improvements will fall under this. The deadline will need to be pushed back so the new project manager can get up to speed, and also due to the expansion in scope of this element of the project to cover the whole EHCP, not just Annual Reviews. Revised target date: 1st June 2022 |
| Dedicated Schools Grant - High Needs Block Demand Management | I | A formal backlog recovery plan needs to be written to address the current backlog. The planning should include: <ul style="list-style-type: none"> • Writing a work plan to determine the next steps to be undertaken. | 01/09/2021 | Work on this action is underway and the service has provided evidence of new monitoring information showing the number of cases cleared each week, and a high-level action plan focused on resourcing the service. Internal Audit is |

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| | | <ul style="list-style-type: none"> • Agreeing performance targets on the basis of number of cases that should be cleared per month, and how performance will be reported. • The service should identify an agreed prioritisation of cases. Internal Audit would recommend considering prioritising completion on annual reviews for; <ul style="list-style-type: none"> - High value placements - Any cases where there are concerns over the current provision - For individuals with personal budgets - Schools that are requesting additional funding | | <p>awaiting evidence of a full backlog recovery plan with a set of performance targets and reporting in order to be able to sign this off as complete.</p> <p>Revised target date: 1st June 2022</p> |
| Debt Recovery 20/21 | I | <p>Detailed best practice procedures should be developed, communicated, and embedded to govern effective debt recovery activity across all three clients. These best practice procedures should be continually assessed to ensure they are proportionate, efficient, and effective. The procedures should be documented and cover:</p> <ul style="list-style-type: none"> • Recovery activities and associated timescales (including timescales for DCA to recover debts and timescales for sending back to the client if debts are not recovered) • Guidance on how to undertake recovery activities • How activity should be evidenced and recorded to maintain complete and consistent case notes • All recovery strategies and guidance on decision making, specifically on criteria for unrecoverable debt • Procedures in relation to dealing with services over disputed debt/debt managed outside of the debt teams • Write off processes • How debts are allocated to Recovery Officers and how these should be prioritised | 30/09/21 | <p>This has been delayed due to covid/and other priorities. The Service has developed a Service Improvement Plan which is continually being updated. This includes introducing and embedding a new portfolio process. The introduction of new documented best practice procedures will be developed and finalised in line with the implementation of processes in the Service Improvement Plan and once the portfolio process has been embedded.</p> <p>A revised Income and Debt Policy including have been sent to S151 for review. Detailed guidance documents will be developed once the policy is agreed.</p> <p>Revised target date: 30th June 2022</p> |

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| | | <ul style="list-style-type: none"> • How ERP Gold workflows and functionality will be best utilised • Use of complaint codes • Deceased cases recovery processes | | |
| Soham Library Preschool Investigation | M | Consideration should be given to the accounting treatment for any Less Than Best lease arrangements (including rent holidays) with the 'cost' of any subsidy being recognised as a nominal cost to a service's accounts to reflect the community benefit invested in these arrangements. | 31/10/21 | <p>The Sector Development and Funding Manager confirmed that this complex proposal is currently being discussed with colleagues in Finance and Education to identify how it could be progressed. As this is a notional accounting entry it is technically complex, and additionally the service experienced high workload due to Covid from January - March 2022, meaning that focus has only been shifted back to policy and service development issues of this nature more recently. The service will continue to update Internal Audit on progress with the action.</p> <p>Revised target date: 30th June 2022</p> |
| Fostering Contract Management | I | <p>Double paying for home-to-school transport: Establish a suitable fee reduction to ensure travel costs are not paid for twice and publish this clearly as part of fee negotiation guidance. Before negotiations for a contract start, it should be fully established whether the child is eligible under the home to-school transport assistance policy and the fee reduction should be agreed accordingly.</p> <p>Guidance should be updated to state that every contract should include a note re: how Home to School transport and transport to contacts is funded, and that this should also be noted on the placement plan.</p> | 01/10/19 | <p>Commissioning presented the draft version to Children's External Placements Governance Board; some minor amends were requested, and they have been asked to share the amended draft with the Social Care Transport meeting attendees for their views. It is estimated that a further month is needed to undertake this consultation element.</p> <p>Revised target date: 1st June 2022</p> |

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| Fostering Contract Management | I | <p>No control process to identify errors in in-house payments: Create a payment policy document that clearly sets out the different scenarios that occur and how they are paid for, such as: respite breaks, children going to university, level 6 carers with a staying put placement etc. Include details about IFA carers transferring to in-house, and the fee agreements relating to children already in place.</p> | 01/07/19 | <p>The consultation response was sent to Foster Carers on 30th March, so the consultation has now concluded and the revised payments came into effect on 1st April. In addition the Fostering Service will publish its Allowances and Skill Level payments alongside other associated allowances on the public Fostering Service website alongside other Local Authorities so that these are easily accessible to current Foster Carers and prospective foster carers. All Approved Foster Carers will be issued a new Fostering Agreement by the end of May 2022 that incorporates these changes. The Service is confident that all carers are aware of the new allowances and service expectations as this continues to be an area of focused work and appraisal in Foster Carer supervision, overseen by Team Managers and the work of the Corporate Parenting Finance Team where any issues are identified.</p> <p>Revised target date: 1st June 2022</p> |
| Key Policies and Procedures | I | <p>Policy Framework: A policy framework document should be drafted which includes:</p> <ul style="list-style-type: none"> • A definitive list of CCC's key policies • links to each policy or where to find them • The update schedules for each • Whether any particular legislation must be taken into account when updating • Whether legal advice is needed on updating (to prevent misinterpretation of legislation) | 30/04/21 | <p>The Policy Framework is currently in draft and Internal Audit has seen sight of it. The process of finalising the framework has been slightly delayed due to staff turnover, but it will be going to CLT for approval on 13th June 2022.</p> <p>Revised target date: 13th June 2022</p> |

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| | | <ul style="list-style-type: none"> • Who is responsible for updating each policy • Who needs to approve changes to the policy (e.g. JMT or service committees) • Templates and Guidelines for the creation of new policies (e.g. is an Equalities impact assessment needed)" | | |
| Complaints | I | <p>Complaints Monitoring: The current complaints processes do not include any corporate monitoring or reporting mechanisms. Without these it is difficult to assess whether complaints are being acknowledged investigated, escalated, or responded to in line with procedures and timescales. It is also difficult to assess the number, nature and type of complaints received by the Council. This is important to support the identification of thematic issues and drive service improvement.</p> <p>The introduction of the corporate Feedback Policy and the new digital complaints solution provides a timely opportunity to introduce monitoring and reporting arrangements.</p> | 01/10/20 | <p>Reporting of corporate complaints will proceed as planned to achieve this audit recommendation using the existing systems and processes, rather than a new system as originally planned. This reporting will note the incoming volumes through the current system and will track which complaints subsequently move through all 3 stages of the corporate complaints process, as by definition these are the complaints that CCC is struggle to resolve.</p> <p>From this it will be possible to see how complaints that come through to Stage 3 have been responded to, including the timeliness of our response, the nature and quality of the investigation and how these complaints have been escalated. Complaints will be categorised according to service, noting the nature of the complaint, the themes emerging through these complaints, the actions CCC has committed to and the learning we need to take from these complaints.</p> <p>A 6 monthly report will be produced with this data, the first one being by 30 Sept 2022 for the first 6 months of 2022/23.</p> |

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| | | | | Revised Target Date: 30 September 2022 |
| This Land | I | <p>Governance arrangements: A formal document is produced and presented to C&IC (as Shareholder) containing governance arrangements of:</p> <ul style="list-style-type: none"> • Reporting to Shareholder; • Corporate performance indicators for delivery against the benefits identified; • Business plan; • Financing the company; • Reserved matters; • Risk, Audit, and internal control <p>This could be a development of the drafted Memorandum of Understanding or a separate document which should be discussed and agreed by the committee, with changes made if necessary. Implementation of this recommendation would substantially increase the audit opinion.</p> | 01/06/21 | <p>The Chief Finance Officer advised that the solicitors, Freeths, have been appointed to work on this action. A governance document is expected in the next 2 months.</p> <p>Target date: 30th June 2022</p> |
| This Land | I | <p>A contract to support the construction/development and bridging loans should be established: A contract to support the construction/development and bridging loans should be established, this should capture:</p> <ul style="list-style-type: none"> • CCC responsible officer/team for managing the arrangements; • What CCC staff should be consulted when This Land purchase 3rd party developments and formalise existing arrangements for purchases from the Council; • Operational performance indicators are identified for | 01/07/21 | <p>The Chief Finance Officer advised that the solicitors, Freeths, are working on consolidating the loan agreement which is supportive of this action. However most of the other components are already in place across the existing loan agreements and work of the monitoring surveyor so once this has been evidenced to Internal Audit, this action can be closed.</p> <p>Target date: 30th June 2022</p> |

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| | | <p>the following areas:</p> <ul style="list-style-type: none"> - Delivery of individual developments to include time, quality, and cost; - Progress reports (as identified in D&C Loan Facility Agreement); - Health and safety; - Any other suitable areas consistent with the Loan Facility Agreements. <ul style="list-style-type: none"> • Remedial timescales and actions; • Monitoring of overall delivery or developments. | | |
| AP 20/21 | I | <p>Supplier Review:</p> <p>A review of suppliers in ERP should be undertaken to identify any further instances where the same company is set up as both a commercial and non-commercial supplier. Each case should be reviewed to establish if the existence as both supplier types is appropriate and if not if should be determined which supplier instances should be deleted or disabled.</p> | 30/06/21 | <p>To mitigate this risk, the New Supplier Request form advises the user to check that a supplier record does not exist in ERP and the Suppliers team is required to complete further checks to prevent duplicate supplier records being set up in ERP.</p> <p>A Duplicate Suppliers report is now available in ERP to identify suppliers with duplicate payment sites and this will be used to undertake an exercise to identify and review any existing suppliers that are set up as both commercial and non-commercial types.</p> <p>An extension is required, due to the additional workload from Future Northants, alongside some challenges in recruiting which are being discussed. This is reliant on experienced resources to review the data and take appropriate action. This is a significant piece of work that requires considerable resource to review supplier databases.</p> |

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| | | | | Revised target date: 30th September 2022 |
| Capital Programme Governance Review | I | There are 27 recommendations in the Capital Programme Governance Review report that became due for implementation on 30 June 2021. | 30/06/21 | <p>Work to establish progress with these recommendations is being progressed as a separate exercise by the Service.</p> <p>As agreed with the Chair of the Audit & Accounts Committee, a further progress report will be provided by the Service to the Audit & Accounts Committee's May 2022 meeting.</p> <p>This progress report will summarise the extent to which the suite of recommendations have been implemented and are routinely complied with.</p> <p>Revised target date: May 2022 A&A Committee</p> <p>The implementation of these actions will be verified by an audit review in Q3 2022/23.</p> |
| 18/19 Ely Bypass Review | I | Limits on Delegated Authority: Consideration should be given to whether the Constitution should be adapted to incorporate limits to delegating authority away from Committees, particularly when there are significant financial implications. | 31/10/19 | This recommendation is being managed in conjunction with the capital programme governance recommendations - see above. |
| | I | Urgent action is taken in conjunction with the Payroll and HR Transactions Manager to address the weaknesses in the quality and accuracy of payroll | 30/09/2021 | Internal Audit met with the Head of Finance and Strategic Finance Manager to discuss progress with this action. It was confirmed that payroll |

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| | | control accounts. | | <p>control account reporting is being received by Finance from the Lead Authority from January 2022. The Finance team are working to establish the extent of unreconciled items and obtain assurances over how these items will be reviewed and cleared. An action plan to address issues with payroll control accounts across all partners is expected to be presented to the Lead Authority Board in June 2022.</p> <p>Revised target date: 30th June 2022</p> |
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