

## APPENDIX B

# Summary of Outstanding Recommendations – under 3 months

(Recommendations due as at January 6<sup>th</sup> 2021).

Audit	Risk level	Summary of Recommendation	Target Date	Status
GDPR	I	ICT Disaster Recovery Plan is not documented: DPO to liaise with LGSS IT to confirm that an action plan is in place to ensure the DRP is documented with an agreed target date. The DPO should monitor progress against this plan and report any significant delays to the SIRO and JMT.	31/12/20	<p>The new draft disaster recovery plan has been circulated within IT for comment and work is progressing to finalise this, although this is being done with the understanding that the document will be subject to regular review and revision over the next 6-12 months as part of the data centre move. The draft document is in use and has been used in 3 successful IT tests and there is a business test planned for 7th Feb for the department to check access in preparation for the Data Centre move. The disaster recovery process is part of the wider Data Centre move programme governance.</p> <p>Revised target date: 1<sup>st</sup> March 2021.</p>
Accounts Payable	I	Supplier Amendment: A review of supplier classification and set up in ERP Gold should be undertaken with the desired outcome to ensure that only individuals such as care customers are classified as non-commercial suppliers in the system.	31/12/20	<p>Progress on this action was delayed due to a change freeze in ERP Gold. Internal Audit have confirmed that in the interim improved manual procedures around supplier amendments have been put in place to further mitigate the risk of bank mandate fraud.</p> <p>Revised target date: 30<sup>th</sup> April 2021</p>

## Summary of Outstanding Recommendations – over 3 months

(Recommendations due as at January 6<sup>th</sup> 2021).

Audit	Risk level	Summary of Recommendation	Target Date	Status
Special Guardian Payments Investigation	E	<p>The overpayment should be recovered: The service should contact the family by letter requesting repayment of the full amount paid. This letter should include:</p> <ul style="list-style-type: none"> <li>• An itemised summary of payments made to them in error;</li> <li>• An offer to discuss repayment through a payment plan; and</li> <li>• A reminder that they should notify the service in respect of any error payments in the future;</li> </ul>	31/07/20	<p>Meetings have taken place with the Special Guardianship Order carers. These have identified the need for further work to understand the extent of actual debts.</p> <p>The overpayment relates to a female child and the payments were for the period 2017-2020. The child had returned to the care of the mother during that time. However, it is now clear that the carers also provided care to a male child during this period and may have been entitled to an allowance for their care. It is possible that the allowances paid for the male child were wrongly badged to the female child.</p> <p>The responsible head of service is continuing to seek to resolve this issue, and clarity about the outcome is expected by the end of February 2021.</p> <p>Revised target date: 28<sup>th</sup> February 2021</p>
Special Guardian Payments Investigation	E	<p>The overpayment should be recovered: Internal Audit suggest the case is referred to the police to be investigated formally alongside internal steps to recover the amounts as above. A formal request for monies owed via standard recovery processes should not impact a police referral.</p>	31/08/20	<p>Once further work has been undertaken (see above) the service will make a decision whether to refer to the police. This approach has been agreed with the Service Director of Children's Services.</p> <p>Revised target date: 28<sup>th</sup> February 2021</p>

Fostering Contract Management 18/19	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. 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> <p>Given the values involved, consideration should be given to calculating the potential over payments made in previous years to inform a decision as to whether or not these sums should be recovered.</p>	01/10/19	<p>The service has reported progress encompassing the two elements:</p> <ol style="list-style-type: none"> <li>1) Review of previous placements where CYP access home to school transport</li> <li>2) Ensuring that processes are in place to ensure that negotiated fees are arranged for placements going forward.</li> </ol> <p>The first element has been delayed due to Covid19. An up-to-date list has been requested from the Home to School Transport team and it is expected that this review will be completed by March 2021 (in anticipation of some complex negotiations).</p> <p>Regarding the second element, a new process has been implemented to ensure that negotiated fees for home to school transport are managed on a case-by-case basis as a 'blanket approach' would not be appropriate given the complexities of individual cases.</p> <p>Revised target date: 31<sup>st</sup> March 2021</p>
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>This activity has now broadened resulting from the decision to align CCC and PCC fostering services into a new shared Fostering Service. The service has identified 18 areas which they are reviewing with Finance Business Partners to see whether adjustments and alignments can be made between the Councils.</p> <p>The service aimed to have the majority of this work completed by 1st December 2020 but a consultation with Foster Carers at both CCC and PCC will need to be undertaken with implementation of any revised payment agreement in the new financial year.</p> <p>The service had drafted a policy document for CCC and are looking at how they can align across both councils.</p>

				Revised target date: 1 <sup>st</sup> April 2021
Transport Contract Management	I	<p>Financial processes: A full financial processes review should be conducted by the SETT in conjunction with the Professional Finance team. This should include immediately ensuring that payments made via interface spreadsheet are linked to a SWIFT ID or other relevant identifier. The review should also ensure that interface payments are being used in the most efficient manner, reducing the amount of duplicate entry required and the risk of human error occurring in the payments.</p> <p>And in the longer term:</p> <ul style="list-style-type: none"> <li>• Developing a new commitment record spreadsheet for adults and LAC transport, which contains all journeys and client information.</li> <li>• Reinstating the use of Purchase Orders and receipting for the payment of all SETT invoices, in line with the Scheme of Financial Management.</li> </ul>	31/07/19	<p>The review has grown in scope from that originally envisaged by the audit. The service confirmed that the Children in Care Transport payments are now entered with a “job number” reference which ties the payment to a specific journey.</p> <p>The commitment record is still work in progress – a more comprehensive/user friendly spreadsheet of routes and costs is now in place, but further work is required. Dealing with social distance transport requirements has had an impact on the services operations and priorities so this work has been delayed.</p> <p>Revised target date: 31<sup>st</sup> January 2021</p>
18/19 Ely Bypass Review	I	<p>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.</p>	31/10/19	<p>Previous update from the service was that they were looking at delegated authorities and how the various levels might best work and that a paper was being developed for consideration.</p> <p>No update has been received for this reporting period so no revised target date can be provided.</p> <p>Revised target date: 30<sup>th</sup> April 2021</p>
19/20 Fire Safety Checks	I	<p>There is not an adequate process for recording and monitoring remedial actions: The Head of Property should ensure that a new central, overarching process is developed to ensure all remedial actions recommended in FRA's are recorded and monitored in detail, including:</p>	31/12/19	<p>The implementation of this action was delayed due to officers in the service being committed to priority Covid-19 Risk Assessment works throughout the Authority. Progress has now been made with some further work needed to fully implement the recommendation. Internal Audit will</p>

		<ul style="list-style-type: none"> <li>• The exact nature of the action required</li> <li>• The priority/risk rating of the action</li> <li>• The date the FRA was completed</li> <li>• The date implementation is required</li> <li>• Who is assigned to undertake the required action e.g. external contractor or internal team/officer.</li> <li>• Responsibility for this new process should be clearly assigned to a specific officer.</li> </ul> <p>It would also assist in timely implementation of actions if who needs to be engaged to undertake the required work was also recorded against each action e.g. external contractor or internal team.</p> <p>The new process should include close liaison with the Compliance Team and regular checks should be conducted to ensure all actions from FRA's have been recorded.</p> <p>The Compliance Team currently record all actions from the FRA they have undertaken in detail and this spreadsheet should be useful in developing the new process.</p> <p>In addition, the Head of Property should investigate whether there are any value for money software solutions that would provide a robust and efficient tool for managing FRA's and the implementation of remedial actions that could be utilised by both the Compliance Team and Facilities Management.</p>		<p>review the amended process in January.</p> <p>Revised target date: 31<sup>st</sup> December 2020</p>
19/20 Fire Safety Checks	I	<p>Detail on FRA's remedial actions and implementation are not reported:</p> <p>Detailed information on remedial actions and implementation of those actions should be reported to the Head of Property on a regular basis. Monitoring recommended at 4.2 would support this reporting.</p> <p>The Head of Property to formally ask HASCAM, the Strategic Health, Safety and Wellbeing Group, the Corporate Health Safety and Wellbeing Group and the Section 151 Officer if they also require this information to</p>	31/12/19	<p>The implementation of this action was delayed due to officers in the service being committed to priority Covid-19 Risk Assessment works throughout the Authority.</p> <p>The Service plans to report to the Chief Finance Officer and the Assistant Director on at least a quarterly basis. Weekly meetings will be re-instated with the Property and Compliance Teams. A training session is being organised on the new process. A separate inbox will be</p>

		allow for independent monitoring and challenge and highlight any significant risks identified from FRAs.		<p>created to make sure that the Fire Risk Assessments are picked up by the appropriate team (the only caveat on this will be if that is viable from an IT perspective).</p> <p>Revised target date: 31<sup>st</sup> March 2021</p>
P&E Cost Recovery	I	<p>Time Recording Software: The exercise to procure time recording software should be pursued as a matter of priority to ensure an efficient time recording system is in place to underpin a robust and consistent cost recovery process across Infrastructure and Growth. The software should be able to:</p> <ul style="list-style-type: none"> <li>• Apply different staff rates, including overheads and risk percentages, for each project.</li> <li>• Automatically calculate staff costs for each project based on the applied rates.</li> <li>• Interface with/upload data to ERP Gold to provide an efficient way of updating project ledgers with staff costs.</li> </ul> <p>This would also support an efficient way of raising accurate invoices to external organisation direct from ERP Gold rather than multiple complex spreadsheets. The software should also be user friendly and simple for staff to use and provide management reporting.</p>	31/03/20	<p>The service has confirmed that due to impact of Covid19 on the service (and IT having to divert their resources into higher priority projects) this project has not been progressed.</p> <p>Revised target date: 31<sup>st</sup> March 2021</p>
Direct Payments	I	<p>Clawback of Overpayments on Direct Payment: In line with the procedure undertaken when recovering underspent or overpaid personal budgets for children, clawback of underspent or overpaid monies is conducted by netting off the amount to be recovered against future payments. This will reduce the amount of money that is due back to the Council that is not returned. Internal Audit's understanding is that this is the process in place for Children's Services and so conversations should be held with key officer's to understand how to apply this system to the Adult's Service.</p>	30/06/20	<p>The service is investigating whether this can be managed via the Mosaic system as an automated clawback function. The service reports that Covid19 events has delayed the required analysis and testing in Mosaic. The service aims to address this recommendation as part of Mosaic finance review project.</p> <p>Revised target date: 31<sup>st</sup> March 2021</p>

Cyber Security	I	<p>Cyber Security Policy:</p> <p>The Council should develop a Cyber Security Policy. This should outline the Councils approved approaches to cyber security, its ongoing security control framework and how it safeguards the Council from the threat of cyber-attacks. It should also provide an overarching governance policy for the protection and security of Council information and data.</p>	30/07/20	<p>CCC have recruited a technical Cyber Security Manager who working with the HOS in both authorities to be the SPOC for cyber related threats and shared between authorities.</p> <p>A cyber security board has been formed that feeds into the information management board.</p> <p>As part of this work a cyber-security dashboard has been produced and shared with JMT along with a clear action plan.</p> <p>Revised target date: 30<sup>th</sup> June 2021</p>
Cyber Security	I	<p>Cyber Security Risk Statement:</p> <p>At the time of our review the Council did not have a risk appetite statement relating to cyber security.</p>	30/07/20	<p>Risks are continually reviewed in relation to threats. An improvement plan has been developed with timelines and the action plan is owned by the new cyber security board. Further work needed including review by information management board.</p> <p>Revised target date: 30<sup>th</sup> June 2021</p>