

APPENDIX B *Summary of Outstanding Recommendations – under 3 months*

(Recommendations due as at 31.8.2021).

Audit	Risk level	Summary of Recommendation	Target Date	Status
This Land	I	Self-assessment: The Council (as Shareholder) requires This Land to undertake a self-assessment against the UK Corporate Governance Code (Appendix 1) to confirm the existing governance arrangements in place and produce an action plan for areas which remain outstanding. This should be produced on an annual basis and presented to C&IC for review.	01/08/21	A consultant has recently been appointed to review This Land and the report is due by the end of October.
This Land	I	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: <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 the following areas: <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. • Remedial timescales and actions; • Monitoring of overall delivery or developments. 	01/07/21	A consultant has recently been appointed to review This Land and the report is due by the end of October.

This Land	I	<p>Risk Appetite: This Land should determine (in consultation with the C&IC as Shareholder) a clear risk appetite of how it intends to operate, this should then be supported by a strategy for managing risk. Seeing this presented to, and discussed by, C&IC would give some assurance that there is a level of oversight of the risk appetite of This Land by the committee.</p>	01/07/21	A consultant has recently been appointed to review This Land and the report is due by the end of October.
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	A consultant has recently been appointed to review This Land and the report is due by the end of October.
KPIs	I	<p>The draft Performance Management Framework lacks the specifics of a quality assurance process for KPIs: The draft Performance Management Framework should be edited to include the specifics of:</p> <ul style="list-style-type: none"> • The quality assurance process that KPIs produced within BI (including where BI take data direct from source systems) undergo • Measures taken to provide assurance on data/calculation reliability for those KPIs reported to BI by officers in other CCC services. <p>We recommend that the latter is addressed through both: a) clear delegation in the Framework of responsibility to senior officers in the services in question</p>	01/09/21	<p>Work is ongoing to develop an updated Performance Management framework. The draft shared during the audit is being further updated and revised in line with: the new Administration's priorities; Peer Challenge recommendations; Internal Audit recommendations; and best practice. Proposals will be discussed with Chairs, Vice Chairs and JMT during September with the new framework to be developed for approval at December Strategy and Resources Committee.</p> <p>Revised target date: 31st December 2021</p>

		b) Sample testing to be carried out on some proportion of these KPIs, either by BI or Internal Audit.		
KPIs	I	<p>The draft Performance Management Framework lacks a formal process for the adding of new KPIs to the suite, or indeed the removal of old ones:</p> <p>The draft Performance Management Framework should be edited to include the specifics of a formal process for the addition/removal of KPIs, including what approval is needed (presumably of the committee affected).</p>	01/09/21	<p>The process for adding / amending / deleting indicators is being detailed in the revised Performance Management Framework (see above).</p> <p>Revised target date: 31st December 2021</p>
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>This this has been delayed due to the high priority work on embedding systems at the new Northamptonshire LAs, including supplier data migration work which has had a significant impact on the Supplier Maintenance Teams resources. This action has also been delayed as any open orders on the relevant supplier records need to be reviewed and closed in advance.</p> <p>Revised target date: 31st December 2021</p>

Feeder Systems	I	<p>Early Years Grants:</p> <p>The Early Year's Funding Coordinator should consider implementing an audit programme of childcare providers to sample check attendance records and confirm that all children for whom providers are receiving payments are still attending the providers settings. This would not need to involve an actual visit to providers but simply a requirement for them to provide attendance records to the Early Year's Funding Team for review.</p>	30/06/21	<p>The Early Years Funding Team have drafted and prepared a draft review programme. They have identified the first group of providers to be audited with the plan to conduct the first reviews coincide with the start of the Autumn funding period as a number of providers/childminders closed for the summer break.</p> <p>Revised target date: 31st October 2021</p>
DR 20/21	E	<p>Aged Debt Review:</p> <p>An exercise should be undertaken to review all debt over 12 months old. The aims of this exercise should be to halt rising aged debt levels and reducing existing aged debt. The review should include:</p> <ul style="list-style-type: none"> • An examination of causal factors behind aged debts • Identifying process amendments to address any causal factors identified • An examination of each customers aged debt to determine: • Whether action from the service who raised the invoice is required • What recovery activity should be undertaken • Whether the debt is considered unrecoverable and should be written off. 	30/06/21	<p>The Debt Service has developed a Draft Improvement Plan which will be continually updated to ensure priorities are recognised and delivered. This will involve changes to service processes and will require gradual and evolving work over time.</p> <p>In line with this approach, the points in the recommendation are primarily being addressed by the implementation of new BAU processes. However, the Head of Service has confirmed that they have now also commenced a review of debts over 12 months old to establish the next steps in relation to each customer.</p> <p>Aged debt reports are now reviewed on a regular basis as part of BAU. These reports are provided to budget holders so they can consider potential unrecoverable debts for write off approval, and take action where debts are in dispute. Write off approvals/processing is now done through ERP workflow processes to ensure review and authorisation is directed to the appropriate budget holder.</p> <p>Service Review meetings have been implemented with services, including Adult Social Care. Meetings include the sharing of granular data and categorising debt by complaint code, age and service, to enable targeted communication and</p>

				<p>actions.</p> <p>The sharing of the data is allowing closer working with Finance Business Partners, who in turn are working with Budget Holders to support debt recovery and any further action required.</p> <p>Debt improvement groups have been implemented to work with services, including ASC, to establish debt principles for recovery, and Debt Portfolios have been implemented and assigned to recovery officers to support a more focussed, structured and targeted approach to active debt recovery.</p> <p>In addition, the Head of Service has confirmed she will be reporting directly to Committee on a regular basis, providing updates on service improvement and activity.</p> <p>Revised target date: 31st December 2021</p>
DR 20/21	I	<p>CCG Debt:</p> <p>The Debt Service should meet with Corporate Finance to agree a target date for when the CCG account will be reconciled and hold regular meetings to monitor progress. It is important that this account is reconciled as a matter of priority so that debt recovery is not adversely impacted by this issue.</p>	30/06/21	<p>CCG is now discussed in the monthly Service Review meetings that have been implemented. A reconciliation of the CCG debt will become part of standard BAU processes.</p> <p>CCG accounts have been streamlined and Finance are liaising with budget holders to ascertain any potential billing issues that may be impacting this area. High level discussions are ongoing between Finance, including the S151 Officer, and CCG on this matter and work is being undertaken to reach a settlement for previous years debt balances. .</p> <p>Revised target date: 30th September 2021</p>

DR 20/21	I	<p>CCG Debt:</p> <p>The Debt Service should arrange a review of the CCG account (with particular regard for invoicing/payment processes) in conjunction with Corporate Finance and the Income Processing Team to establish the root causes of the problem/s that have led to the current position of the CCG account and put measures in place to ensure this does not happen in the future.</p>	30/06/21	<p>CCG is now discussed in the monthly Service Review meetings. Some of the original Debt problem stemmed from the implementation of ERP where payments were allocated on an oldest first approach. This has particularly caused issues on the CCG accounts due to the sheer volume of invoicing, and part payments made by the CCG.</p> <p>A new CCG Account has been set-up to help address the problem going forward.</p> <p>High level discussions are ongoing between Finance, including the S151 Officer, and CCG on this matter. CCG accounts have been streamlined and Finance are liaising with budget holders to ascertain any potential billing issues that may be impacting this area.</p> <p>Corporate finance are working with the NHS to solve issues with way the NHS's third party provider reference remittance advice notes which should improve the application of payments to invoices.</p> <p>Revised target date: 30th September 2021</p>
DR 20/21	I	<p>KPIs and targets:</p> <p>KPIs and targets for debt recovery should be introduced. High level targets should be agreed with clients at a senior level, and KPIs and performance measures should be introduced within debt teams for DR Officers.</p>	30/06/21	<p>The service has agreed with the Partnership Board that no high level debt recovery targets will be implemented. However, new debt reports provide management with detailed information with which to monitor debt levels, movement, and collection.</p> <p>A new debt portfolio process is to be introduced imminently which will ensure individual debt recovery officers priorities are outlined based on a number of factors including the value an debt age and value. This change means that introducing individual targets at this stage could mean they are unrealistic so it has been decided to review performance data once the new portfolio process</p>

				<p>has been embedded so that targets to drive team and individual performance can be based on BAU data.</p> <p>Revised target date: 30th April 2022</p>
DSG - High Needs Block Demand Management	I	<p>Backlog recovery plan: A formal backlog recovery plan needs to be written to address the current backlog. The planning should include:</p> <ul style="list-style-type: none"> • Writing a work plan to determine the next steps to be undertaken. • 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 	01/08/21	<p>Writing a formal backlog recovery plan is still a planned action but has yet to be completed due to staff absences. However the service has mentioned that it working to address the backlog by recruiting six SEN Casework officers and Business Officers</p> <p>Revised target date: 30th September 2021.</p>
Capital Programme Governance Review	I	<p>There are 26 recommendations in the Capital Programme Governance Review report that became due for implementation on 30 June 2021.</p>	30/06/21	<p>A progress report from the Project Assurance Group is being prepared at the end of September for the Executive Director to assess progress against the management actions from the audit.</p> <p>Revised target date: 30/12/21</p>

Summary of Outstanding Recommendations – over 3 months

(Recommendations due as at 31.8.2021).

Audit	Risk level	Summary of Recommendation	Target Date	Status
GDPR	I	The Information Register is not complete and reviewed on a regular basis: DPO to ensure that a continual review of the Information Asset Register is undertaken and any gaps are reported to the Information Management Board including escalation to the relevant Director.	30/04/21	<p>The IG Service is looking at how best to bring together the information asset registers for both councils (CCC & PCC) into one to ensure that they have visibility across both organisations with consistency in how assets are described. This also requires the engagement of services as a full understanding is needed regarding the information held and shared, especially given the impact of COVID 19 on the need to process new information and share with new partners. Most of the work requires input from services and the pressures on services during the pandemic has meant that progress has been slowed. However, the IG service has been able to reorganise itself to dedicate greater resources to review the registers - gaps have been identified and therefore the service is able to address any issues or urgent updates in the meantime.</p> <p>A paper will be going to the Information Management Board in September to set out the plan with services.</p> <p>Revised target date 30th September 2021</p>
Fostering Contract Management	I	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	01/10/19	<p>The process for the Access to Resources Team to request discounts / negotiated fees for provisions where Home to School Transport is provided is embedded into the team processes. It is noted however that at present there is no formal process recorded (that is to say, the team</p>

		<p>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>have a procedure they undertake, but this is not a documented procedure).</p> <p>Commissioning are in the process of formalising the procedure and seeking ratification for it from senior managers; this process may take up to three months. As outlined previously, Access to Resources are not able to apply a 'blanket approach' to home to school transport – there are situations where a carer travels a significant distance for contact or where children attend school in two different directions, where it would not be appropriate to request a discount for transport, but this is considered on a case by case basis; the process will reflect this.</p> <p>Revised target date: 31st December 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 broadened resulting from the decision to align CCC and PCC fostering services into a new shared Fostering Service. The implementation of this recommendation has been delayed due to the restructuring of the service and the required staff consultation taking priority.</p> <p>However, new systems are in place and the payments policy has now been drafted. A consultation with Foster Carers at both CCC and PCC will to be undertaken as the next step prior to fully implementing the finalised policy. Many carers are on holiday during the summer months; therefore the consultation will be launched in September when carers are available to respond.</p> <p>Revised target date: 31st October 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>This recommendation now forms part of the block of 26 Capital Programme Governance Review recommendations, detailed on pp.8-9 of this document.</p> <p>Revised target date: 30th September 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"> • Apply different staff rates, including overheads and risk percentages, for each project. • Automatically calculate staff costs for each project based on the applied rates. • Interface with/upload data to ERP Gold to provide an efficient way of updating project ledgers with staff costs. 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. 	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 as planned.</p> <p>The latest update from the service confirmed that a system that can be added onto MS Teams has now been identified but the implementation will take some further time.</p> <p>Revised target date: TBC</p> <p>The Service is awaiting an update from IT regarding a revised implementation date.</p>
Accounts Payable 19/20	I	<p>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.</p>	31/12/20	<p>Progress on this action has been delayed due to a change freeze in ERP Gold, and also by the impact of the pandemic/priority work on embedding systems at the new Northamptonshire LAs, including supplier data migration work which has had a significant impact on the Supplier Maintenance Teams resources. Work on this is now progressing, linked to other changes in ERP to further strengthen the supplier amendment process. This has increased the complexity of the build so more time is required.</p>

				<p>Revised target date: 31st October 2021</p> <p>It should be noted that the 20/21 AP report gave good assurance over controls and compliance.</p>
AP 20/21	I	<p>Supplier Review:</p> <p>A review of Virgin Media Ltd suppliers in ERP gold should be undertaken with the aim of reducing the number of suppliers for that company and ensuring that the instances where Virgin Media Ltd is set up for non-commercial payments are either deleted or disabled.</p>	30/04/21	<p>A Duplicate Suppliers report is now available in ERP to identify suppliers with duplicate payment sites. In addition to the BAU processes above, an exercise will be undertaken specifically to review the Virgin Media Ltd suppliers but this has been delayed due to the high priority work on embedding systems at the new Northamptonshire LAs, including supplier data migration work which has had a significant impact on the Supplier Maintenance Teams resources. This action has also been delayed as any open orders on the relevant supplier records need to be reviewed and closed in advance.</p> <p>Revised target date: 31st December 2021</p>
Accounts Receivable 19/20	I	<p>Income allocation is not monitored with data and performance against targets regularly reported: Reporting should be amended to provide information to management, including data on KPIs, to allow for effective monitoring in key areas relevant to performance. This should be provided on a monthly basis and include:</p> <ul style="list-style-type: none"> • New suspense items cleared - value and volume • New suspense items cleared in that month - value and volume (a KPI associated with this would be better than 3 days clearance) • Total value and volume cleared each month • Volume & value (and percentage) of aged suspense items relating to each previous month) • Performance against agreed KPIs • This will help provide context to performance and help drive performance in a way that current reporting cannot. 	31/01/21	<p>The implementation of this recommendation has been delayed due to the impact of the pandemic/the LGSS review and transition to the lead authority mode. In addition, the service was prioritising the future Northamptonshire project work.</p> <p>Further discussions are required with Finance Business Partners regarding the introduction of a fortuitous income code.</p> <p>Income suspense is reported on a monthly basis to Finance Business Partners with a RAG status and suspense items broken down into age profile. Current reporting has been enhanced and developed to include the bullet points in the recommendation (with the exception of data on items relating to each previous month) so that reporting provides detail of the timeliness of</p>

		<p>Last year it was recommended that any aged items in suspense should be allocated to a fortuitous income code once all proportionate investigations had been unable to allocate the payment. This is progressing but has not yet been fully implemented and embedded across all three clients yet. Once implemented, data on aged items allocated to fortuitous income should be included in reporting.</p>		<p>suspense account clearance each month</p> <p>Revised Target Date: 30th September 2021</p> <p>Whilst this action remains outstanding it should be noted that the 20/21 AR report has now been completed which gave good assurance over controls and compliance.</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) • 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)" 	30/04/21	<p>The Head of Policy, Design and Delivery confirmed that work on this recommendation is underway, however has been delayed due to vacancies (recruitment underway), commitments in existing projects and the policy and strategy work in the Joint Agreement Action Plan. This work is also being undertaken to include the new Administration priorities and Peer Challenge recommendations.</p> <p>Revised target date 31st October 2021</p>
Complaints	I	<p>Complaints Policy and Guidance: The review highlighted that the Council was operating without either a Corporate Complaints Policy or detailed guidance on local operating procedures. Instead, a corporate complaints leaflet with minimal details was in place. There was no consistent process in place for dealing with complaints across the Council. Instead inconsistent local processes were in place in different directorates and services. These issues have been identified by the Council and plans are in place to introduce a Corporate Feedback Policy and implement a digital complaints solution across</p>	31/03/20	<p>The Director Customer & Digital Services has advised;</p> <p>"The policy and guidance are now in place. However, to assist with the implementation of this policy the service planned to implement a digital complaints management solution. Progress with this system was impacted by pressure on the LGSS Digital team through the height of the pandemic when work had to be re-prioritised to support our COVID response. This team was then impacted by the re-patriation of staff from LGSS to the various LGSS partner authorities in October</p>

		the Council to replace the various spreadsheet based local processes.		<p>2020 and by the backlog of digital work, particularly the creation of on-line forms, which again had to be carefully prioritised. Progress is now being made, the system has been developed and testing is currently taking place. On the assumption that the testing progresses well we expect that the recommendation will be fully implemented by 30th September 2021”.</p> <p>Revised target date: 30th September 2021</p>
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 is planned to commence once the digital complaints solution has been implemented and new processes have been embedded (see above).</p> <p>Revised Target Date: 31st December 2021</p>
This Land	I	<p>Annual Assurance Statement: An annual assurance statement should be provided to the Shareholder considering whether or not a sound system of internal control exists within the company and that the obligations documented with the Loan Facility Agreements have been met. An independent Internal Audit function should deliver an annual opinion on whether this is in place and highlight any areas of concern. As a wholly owned company of the Council, a public body, the requirements of the Accounts and Audit Regulations apply and therefore the Council’s Audit Committee has responsibilities to be assured regarding the governance,</p>	01/05/21	<p>A consultant has recently been appointed to review This Land and the report is due by the end of October.</p>

		control and risk management operating within the company.		
This Land	I	Corporate Risk Register: The council captures the risks associated with This Land on its corporate risk register.	01/03/21	This will be included in the risk register ASAP. Revised date 30/9/21