

## ANNEX B *Summary of Outstanding Recommendations*

(Recommendation status as at 6.07.2022).

### *Essential Recommendations overdue*

Audit	Risk level	Summary of Recommendation	Target Date	Status
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"><li>• 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</li><li>• 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.</li></ul>	30/11/2021	<p>The IT service has completed a further external IT Health Check (ITHC) penetration testing and has developed an action plan to track remediation works identified as being required by the ITHC. In order to re-obtain PSN Certification, the service need to document and submit a Remedial Action Plan, which is being created based on the current action plan. The service aim to submit this in July 2022 and hope to re-achieve PSN certification shortly thereafter.</p> <p>Revised target date: 31st August 2022</p>

## Recommendations overdue – under 3 months

Audit	Risk level	Summary of Recommendation	Target Date	Status
DSG - 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	This has been delayed by the need to align with work to the new Safety Valve Monitoring (SVM) work now taking place around Dedicated Schools Grant High Needs Block expenditure. The service is now aiming to complete this action in August.  Revised target date: 31st August 2022
Fees and Charges	H	The Director of Resources should commission a piece of work to reconcile from the fees and charges income code (J100) in ERP against the published schedules to ensure that all statutory and discretionary charges are published accurately. In addition, the following types of reduced charge/free services should be identified: <ul style="list-style-type: none"> <li>• Subsidised fees,</li> <li>• Charging exemptions,</li> <li>• Concessions,</li> <li>• Statutory prohibition.</li> </ul>	30/06/2022	Internal Audit awaits progression update and revised target date and/or evidence of completion.  Revised target date: TBC
Fees and Charges	H	Following the update of the policy and guidance, a communication strategy should be developed which raises awareness and embeds the policy and best practice guidance across the organisation.	30/06/2022	Head of Commercial confirmed service communication strategy is underway. The service intends to send communications and guidance out in a timely way as per the business cycle

				<p>timescales as well as provide additional support to services if new to charging or needing a review.</p> <p>The plan is to:</p> <ul style="list-style-type: none"> <li>• Engage with high use services (those with multiple charges / portfolio of income generating products) for feedback as well as commence communication of revised policy [complete – all ‘traded services’ and high use services engaged directly and as a group]</li> <li>• Senior Transformation Advisor has drafted a note for CLT for final sign-off of the policy and the implementation plan. [due mid-July]</li> <li>• Finance Business Partners and their teams to receive briefing so they can check, challenge and support adherence to policy [planned mid-July immediately after CLT]</li> <li>• Embed policy within Business Planning and MTFS documentation, guidance and timeline [complete]</li> </ul> <p>Revised target date: 31<sup>st</sup> July 2022</p>
Consultancy Contracts Assurance	H	A system of formal reporting on the award of procurement waivers and approvals of direct awards should be introduced, with exemptions awarded reported to Internal Audit and CLT in addition to the Head of Procurement. Consideration should also be	30/06/2022	The service has reported that direct awards must now have the approval of the procurement team. The team have established a log to record this activity and are conducting checks of the Contract Register to identify noncompliance.

		given to sending the reporting to Strategy and Resources Committee. This will enable greater scrutiny and challenge of the award of waivers, in addition to the above measure.		Internal Audit are awaiting final evidence of this to enable sign-off of this action as closed.
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### *Summary of Outstanding Recommendations – over 3 months*

Audit	Risk level	Summary of Recommendation	Target Date	Status
DSG - 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	<p>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. A further delay has also been caused by the need to align this work to the new Safety Valve Monitoring (SVM) work now taking place around Dedicated Schools Grant High Needs Block expenditure. The service is now aiming to complete this action in August.</p> <p>Revised target date: 31st August 2022</p>
DSG - High Needs Block Demand Management	I	<p>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"> <li>• Writing a work plan to determine the next steps to be undertaken.</li> <li>• Agreeing performance targets on the basis of number</li> </ul>	01/09/2021	In order to fully develop a backlog recovery plan including measurable targets, a meeting needs to be scheduled with the Statutory Assessment Team Senior Business Officers to establish targets. Then the team can work to develop reporting from the ONE system to track progress

		<p>of cases that should be cleared per month, and how performance will be reported.</p> <ul style="list-style-type: none"> <li>• 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"> <li>- High value placements</li> <li>- Any cases where there are concerns over the current provision</li> <li>- For individuals with personal budgets</li> <li>- Schools that are requesting additional funding</li> </ul> </li> </ul>		<p>against the plan. This has been delayed due to annual leave of the officers who need to be involved in developing the plan, but is now expected to progress and the service is aiming to agree a formal backlog recovery plan in August.</p> <p>Revised target date: 31st August 2022</p>
DSG - 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	<p>This has been delayed by the need to align with work to the new Safety Valve Monitoring (SVM) work now taking place around Dedicated Schools Grant High Needs Block expenditure. The service is now aiming to complete this action in August.</p> <p>Revised target date: 31st August 2022</p>
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 expected services.	31/01/2022	<p>The service has been working on this action and has been in regular correspondence with Internal Audit to discuss progress and possible different approaches to mitigating the risk. At the time of writing, these discussions are ongoing.</p> <p>Revised target date: 31<sup>st</sup> August 2022</p>
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	The Assistant Director, HR Services, confirmed that "This was discussed in CLT and it has been agreed that we will write out to all officers twice a year as a reminder about the process to be followed. We considered keeping a central

				<p>record of boards and who is on them but realistically it changes so fast that it would be out of date as soon as it was signed off. What CLT have agreed to do is:</p> <p>Issue a reminder to all officers along with some guidance that has been prepared by the Legal Team on advice for members and officers serving on outside bodies and we will reissue the guidelines to remind people of the importance of declarations both for themselves and the council. We will ask people twice a year to consider whether there is anything new that they should have declared but haven't or whether anything has changed in the last 6 months that needs updating/removing from the record."</p> <p>Revised target date: 31<sup>st</sup> July 2022</p>
DR 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"> <li>• 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)</li> <li>• Guidance on how to undertake recovery activities</li> <li>• How activity should be evidenced and recorded to maintain complete and consistent case notes</li> </ul>	30/09/21	<p>The Income Policy has been reviewed and updated for all clients and came into effect from April / May 2022. The policies set out the key principles in respect of billing and income recovery. Additionally to support staff responsible for debt recovery there are a number of working documents and crib sheets that are provided to staff as part of their induction or following training.</p> <p>It is recognised however that it would be good for the individual documents to be incorporated</p>

		<ul style="list-style-type: none"> <li>• All recovery strategies and guidance on decision making, specifically on criteria for unrecoverable debt</li> <li>• Procedures in relation to dealing with services over disputed debt/debt managed outside of the debt teams</li> <li>• Write off processes</li> <li>• How debts are allocated to Recovery Officers and how these should be prioritised</li> <li>• How ERP Gold workflows and functionality will be best utilised</li> <li>• Use of complaint codes</li> <li>• Deceased cases recovery processes</li> </ul>		<p>into a single guidance document that all staff can make reference to as part of their role. Bearing this in mind an Income notes of guidance document for staff is planned to be produced during 2022/23.</p> <p>Revised target date: 30th September 2022</p>
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 the specific staff from Finance who are needed to progress this action are currently working full time on preparing the draft accounts, so there has not been capacity to progress this further.</p> <p>Finance have confirmed that they are hoping to have some capacity to look at this action with the service in mid to late August.</p> <p>Revised target date: 30th September 2022</p>

Fostering Contract Management	I	<p>No control process to identify errors in in-house payments:</p> <p>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>Head of Service for Corporate Parenting has shared with audit an extract from the draft Foster Carer Handbook detailing the council's current payment arrangements.</p> <p>This document outlines the current Level 1-4 basic allowance as well as gives details of additional allowances that professional foster carers may be eligible. Once the document has been finalised, printed and distributed, it should be possible to close this action.</p> <p>Revised target date: TBC</p>
Key Policies and Procedures	I	<p>Policy Framework:</p> <p>A policy framework document should be drafted which includes:</p> <ul style="list-style-type: none"> <li>• A definitive list of CCC's key policies</li> <li>• links to each policy or where to find them</li> <li>• The update schedules for each</li> <li>• Whether any particular legislation must be taken into account when updating</li> <li>• Whether legal advice is needed on updating (to prevent misinterpretation of legislation)</li> <li>• Who is responsible for updating each policy</li> <li>• Who needs to approve changes to the policy (e.g. JMT or service committees)</li> <li>• Templates and Guidelines for the creation of new policies (e.g. is an Equalities impact assessment needed)"</li> </ul>	30/04/21	<p>The Draft framework policy has been reviewed by the BID Director and went to Democratic Services for inclusion in the CLT pack for 4th July.</p> <p>Audit has reviewed this policy against the recommendation item suggestions and fed back to the Policy &amp; Strategy Lead.</p> <p>Service are consulting with DMT for further feedback and intend to take the policy to CLT in October for approval.</p> <p>Revised target date: 31<sup>st</sup> October 2022</p>



Complaints	I	<p>Complaints Monitoring:</p> <p>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.</p> <p>This report 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 – by definition these are the complaints that CCC struggles to resolve.</p> <p>From this the service can 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. We will categorise these complaints according to service, noting the nature of the complaint, the themes emerging through these complaints, the actions we have committed to and the learning we need to take from these complaints.</p> <p>We will produce a 6 monthly report, the first one being by 30 Sept 2022 for the first 6 months of 2022/23.</p> <p>Revised Target Date: 30th September 2022</p>
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This Land	I	<p>Governance arrangements: A formal document is produced and presented to C&amp;IC (as Shareholder) containing governance arrangements of:</p> <ul style="list-style-type: none"> <li>• Reporting to Shareholder;</li> <li>• Corporate performance indicators for delivery against the benefits identified;</li> <li>• Business plan;</li> <li>• Financing the company;</li> <li>• Reserved matters;</li> <li>• Risk, Audit, and internal control</li> </ul> <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>Director of Resources confirmed:</p> <ul style="list-style-type: none"> <li>• Annual submission of business plan is due at Sept 2022 S&amp;R Committee.</li> <li>• A new chairman of This Land and company secretary have recently come into role, providing a timely opportunity, alongside the AY recommendations, to refresh these arrangements.</li> <li>• The external solicitors, Freeths, have been appointed to advise the Council on refresh of the governance documents, taking account of the recommendations raised here, and service are currently in liaison with This Land around this and expect to be able to advise Sept 2022 S&amp;R Committee on the outcome of that advice and enhancements/changes that result from it.</li> </ul> <p>Revised target date: 21<sup>st</sup> September 2022</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</p>

				<p>exercise to identify and review any existing suppliers that are set up as both commercial and non-commercial types.</p> <p>Requirement will form part of procurement of new duplicate payment checker solution to be procured during 2022/23, thereby ensuring that the solution implemented manages and reports such duplicate to facilitate data cleansing across all clients.</p> <p>Revised target date: 31<sup>st</sup> December 2022</p>
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 &amp; Accounts Committee, a further progress report was provided by the Service to the Audit &amp; Accounts Committee's May 2022 meeting.</p> <p>This progress report summarised the extent to which the suite of recommendations have been implemented and are routinely complied with.</p> <p>The implementation of these will be verified by an audit in Q3 2022/23.</p>

18/19 Bypass Review	Ely I	<p>Limits on Delegated Authority:</p> <p>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>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 &amp; Accounts Committee, a further progress report was provided by the Service to the Audit &amp; Accounts Committee's May 2022 meeting.</p> <p>This progress report summarised the extent to which the suite of recommendations have been implemented and are routinely complied with.</p> <p>The implementation of these will be verified by an audit in Q3 2022/23.</p>
	I	<p>Urgent action is taken in conjunction with the Payroll and HR Transactions Manager to address the weaknesses in the quality and accuracy of payroll control accounts.</p>	30/09/2021	<p>The Lead Authority Board met on 9th July to discuss a proposed Payroll Service Improvement Plan which has included identification of additional resource required for reconciliation of payroll control accounts. This resulted in an agreement to recruit to additional posts. An improvement plan and workflow pathway mapping for payroll, supported by the WNC Transformation Team has been shared with the Chief Finance Officers.</p> <p>At CCC, Finance staff have developed their own action plan to address the high balances on CCC payroll control accounts, which has been shared with Internal Audit. Work has started on trying to</p>

				<p>clear the aged suspense items where CCC Finance staff are able to do so, although this work will not be fully resourced until the preparation of the Council's accounts is complete.</p> <p>Revised target date: 1st September 2022</p>
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