

## ANNEX B *Summary of Outstanding Recommendations*

(Recommendation status as at 14.09.2022).

### *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 CCC PSN application was submitted 2<sup>nd</sup> August 2022 and this application contained a Remediation Action Plan (RAP) containing a list of High and Medium severity vulnerabilities. The CCC PSN application failed the validation stage and was therefore rejected by the Cabinet Office on 23<sup>rd</sup> August 2022 for containing too many high risk vulnerabilities. As of September 2022, the IT service have reduced the number of high severity vulnerabilities from 58 to 31 and plans are in place to close a further 24 high severity vulnerabilities before the next PSN submission.</p> <p>In order to meet the Cabinet Office validation criteria for the next PSN submission, a plan to dovetail the resolution of outstanding vulnerabilities is being formulated with a new IT Health Check to be carried out for confirmation. This work will continue to be progressed as a matter of priority and its progress carefully monitored.</p> <p>Revised target date: 01/03/2023</p>

### *Recommendations overdue – under 3 months*

<b>Audit</b>	<b>Risk level</b>	<b>Summary of Recommendation</b>	<b>Target Date</b>	<b>Status</b>
DSG - High Needs Block Demand Management	I	The service has indicated that they plan to address this concern by developing a fair and consistent banded funding system linked to revised descriptors of need. This should be developed and implemented as soon as possible, and should link to guidance setting out when EHCP's are necessary (see Recommendation 4, below). Existing EHCP funding allocations should be reviewed and re-awarded using the new funding system at Annual Review; if capacity to implement this is an issue, the service should focus on reviewing the most costly EHCP's first.	01/04/2022	The service has indicated this action is complete. Internal Audit are awaiting the receipt of supporting evidence before final closure of this action.
DSG - High Needs Block Demand Management	I	Alongside the new Post Assessment Panel, written guidance should be introduced that will help officers make a decision on whether an EHCP is necessary. In particular, this should include detailed guidance on the types of support that should initially be offered by the school as standard for all children with identified special educational needs, before additional funding via an	01/09/2022	Internal Audit is currently working with the service to review this action.

		EHCP is required. Guidance should link to the funding matrix used to award funding based on finalised EHCPs (see Recommendation 3, above). Given the need to ensure that support is tailored to the individual, the guidance should also include a clear process for additional approval of any exceptional individual cases where there may be recommendation to award an EHCP outside of the normal parameters set by the guidelines.		
DSG - High Needs Block Demand Management	1	Key Performance Indicators should be developed to monitor the effectiveness of the Post Assessment Panel once it is implemented; in particular, tracking changes in the percentage of children assessed where the decision is made not to issue an EHCP.	01/09/2022	The service has indicated this action is complete. Internal Audit are awaiting the receipt of supporting evidence before final closure of this action.
DSG - High Needs Block Demand Management	1	<p>Compliance with the 12-month timescale for annual reviews should be measured and monitored to provide understanding of the baseline position of the service and the impact of current resource issues. The monitoring processes for annual reviews needs to be reviewed in order to ensure that</p> <ul style="list-style-type: none"> <li>• Reviews are completed within the statutory timescale;</li> <li>• The authority receives a written report setting out any recommendations or any amendments to be made to the EHCP within two weeks of the annual review meeting;</li> <li>• The local authority informs the child's parent or the young person and the school attended the decision within four weeks of the review meeting;</li> <li>• A final EHCP is issued within 8 weeks of the original amendment notice.</li> </ul>	01/09/2022	The service has indicated this action is complete. Internal Audit are awaiting the receipt of supporting evidence before final closure of this action.

		This monitoring process will also aid with the recently introduced requirement for local authorities to monitor annual reviews as part of the data submission for SEN2 return.		
DSG - High Needs Block Demand Management	I	A detailed written training package should be developed and implemented by the local authority and distributed to schools and special educational needs coordinators (SENCO), with information on how to conduct an annual review meeting and how to amend an EHCP after an annual review has taken place. The service should also seek to identify schools which repeatedly supply annual review forms that do not meet the standard requirements expected by CCC and retrain them, in addition to challenging paperwork sent by schools if it is not completed correctly.	01/09/2022	<p>A new temporary training post is being created. Alongside managers the postholder will develop an Annual Review plan and also train Schools/SENCO's on how to complete Annual Reviews. The service hope this will make reviews more consistent and also inform Schools on the importance of meeting the deadlines. The Training Officer role is currently awaiting job evaluation; it is planned to advertise the role on 30<sup>th</sup> September and the role will commence in the Autumn term 2022. Awaiting revised target date.</p> <p>Revised target date: TBC</p>
Fees and Charges	H	<p>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:</p> <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	<p>Head of Commercial is in discussions with Head of Finance regarding collaboration and ownership between teams to fully complete action. Head of Finance has some reasonable concerns as to whether the completion of the exercise will garner any improvements to the current schedules.</p> <p>Revised target date: 01/12/2022</p>

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	<p>Head of Commercial confirmed 'these are very much underway since we are knee deep in Business Planning. The note for CLT has been completed however due to summer leave and the consultation, it was felt more appropriate to wait until September so that those in the roles going forward will lead. On that note, I shall be handing responsibility for this over to Clare Ellis from 1st September and will handover all background and current work. The ultimate deadlines for these actions I suggest should align to the BP work which gets full sign-off in February therefore December as a final officer deadline makes sense to me - this work isn't isolated as forms part of an overall suite of policies and strategies (as it should) to aid delivery of a coherent and robust business plan.'</p> <p>Revised target date: 01/12/2022</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 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.	30/06/2022	<p>The Head of Procurement has confirmed that the process for formal reporting of procurement waivers and approvals of direct awards will go to the new Procurement Governance Board, which had its first meeting in July. The first report on direct awards and waivers will be taken to the next meeting of the Board on the 28th of September, and this action will be closed once the report is completed and circulated to Internal Audit.</p> <p>Revised target date: 28/09/2022</p>

Consultancy Contracts Assurance	H	Reporting on consultancy expenditure to Committee should include whether or not an approved Approval To Engage a Consultant form (or the new equivalent e-form) has been completed for each separate consultancy assignment.	31/07/2022	<p>The next report on Consultancy Spend will be going to Audit &amp; Accounts Committee on the 24th of November. This will include stating for each consultancy engagement whether there is an Approval To Engage A Consultant form in place.</p> <p>Revised target date: 24/11/2022</p>
Consultancy Contracts Assurance	H	When the new recruitment panel process for consultancy expenditure is implemented, HR should conduct a communications campaign to ensure staff are aware of the process for correctly procuring consultancy resource. This should include targeted communications to Procurement officers and Finance officers, to ensure they are also able to signpost colleagues to the correct process if they are made aware of plans to procure consultants.	31/07/2022	<p>CLT took the decision to implement an eform, rather than a time-consuming approvals panel. This has been developed for managers to seek approval to engage an interim, and will be rolled out as soon as recent senior management structural changes have been updated. Once it is launched, communications will take place.</p> <p>HR are continuing to work on updating the approval process for consultants – work is being undertaken jointly by Procurement, Finance and HR. Once the approval route is finalised, communications will take place.</p> <p>Revised target date: 30/11/2022</p>
Healthy Child Programme	H	Linked to the previous recommendation, Public Health should conduct an exercise to scrutinise all non-staffing costs in the CCS/Cambridgeshire element of the Section 75 Agreement and seek to bring these more in line with the CPFT costs, with particular challenge to the cost of estates and overheads. The Section 75 Agreement permits the cost of the contract to be varied each year as agreed in the Annual Development Plan, so the	31/08/2022	The service report that work to scrutinise non-staffing costs has been underway from the Provider side, specifically focussing on the highest cost estate in Huntingdon, where they have negotiated a new lease price. The provider is now in a state to review expenditure by each service operating out of the site and wider work is underway to explore opportunities for shared

		service should seek to agree a reduction to non-staffing costs to be implemented in the 2023/24 Annual Development Plan (or sooner if agreement can be reached with the provider).		<p>use of estates across a broader range of partners. The service note that the Provider has flagged the increased associated costs with Estates Management, linked to the inflation and higher energy costs, which will impact on buildings across Cambridgeshire &amp; Peterborough.</p> <p>Revised target date: 31/12/2022</p>
Healthy Child Programme	M	Include greater detail on forecast outturn projections in the quarterly financial reporting with information on the assumptions underlying the forecast.	31/08/2022	<p>In the Q1 Contract Meeting, commissioners flagged that information submitted on forecast outturns was in the same format of previous submissions. This will be the focus of the Finance Meeting scheduled in October and is part of the work on contract finance that the service is progressing with the Head of Diligence &amp; Best Value. This is closely linked to wider work around developing robust open book reporting, which is a complex action and there is significant work required with the provider to develop this. The Provider has agreed to start forecasting outturn projections earlier than previous years, with a detailed forecast to be prepared for the 6m finance meeting on the 6th of October.</p> <p>Revised target date: 31/10/2022</p>

### *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	As part of the Safety Valve Project the team are reviewing 2000 EHCP allocations currently in place. The intention is to use this work to develop the checklist indicating good practice. It was intended that the checklist would be developed by the end of August but this has not been completed. Awaiting a revised target date for this action.  Revised target date: TBC
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	A new Personal Budgets Officer has been appointed and is currently reviewing all Personal Budgets. The Personal Budget Policy will be updated after this review. Awaiting a revised target date for this action.  Revised target date: TBC
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	Internal Audit met with the service to discuss this action. The service agreed to implement the action for new interim contracts going forwards, but felt that it would risk relationships with interims to attempt to implement this retrospectively for existing contracts. Instead the aim will be to implement this for existing contracts at the point of contract renewal or



				<p>negotiation. The service have committed to update their internal recruitment guidance to reflect this and carry out communications with staff recruiting interims for the service to ensure they are aware of this requirement.</p> <p>Revised target date: 30<sup>th</sup> September 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> <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> </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 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: 30<sup>th</sup> September 2022</p>

		<ul style="list-style-type: none"> <li>Deceased cases recovery processes</li> </ul>		
Soham Library Preschool Investigation	M	<p>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.</p>	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>Revised target date: 30th September 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"> <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>Service has provisional date of 17th October to return to CLT. Draft policy making rounds at DMT for comment.</p> <p>Service are developing a short training course for Policy Officers and will be asking the Services to nominate colleagues to attend. It will be 2 sessions split over 2 hours where they will be introduced to the framework and library and will have a couple of exercises to work on. These are planned to run in September.</p> <p>Policy &amp; Strategy Manager confirmed 'We have also started to have conversations about a more sophisticated library. The current excel</p>

				<p>spreadsheet is a good starting point, but what we really want is something housed on Camweb that is easy for Officers to use and access. This will (hopefully) be in place by the new financial year. We are also exploring the appetite for a Policy Officer Community of Practice – this is one of the things we will canvas at the training session.'</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>
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 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	<p>There are 27 recommendations in the Capital Programme Governance Review report that became due for implementation on 30 June 2021.</p>	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>
	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 control accounts.	30/09/2021	<p>The Lead Authority Board meeting on 24th August was presented with an update on the Payroll and HR Transaction Service Improvement Plan. Although the service has had some success in recruiting, vacancy is still an issue for the team; however, meetings have taken place with all the partner finance teams as part of the work to clear control accounts. There is a known issue with the Teacher's Pensions control account, and until this is rectified this control account cannot be reviewed; further information on the length of time it will take to rectify this issue has been requested. The Service Director for Finance &amp; Procurement has requested an update on timelines for reviewing the overpayments control accountant Cambridgeshire and detail regarding the division of responsibilities for clearing this payroll account between Payroll, Finance and Business Systems. A further update will be provided at the next Lead Authority Board meeting at the end of September.</p> <p>Revised target date: 30th September 2022</p>

