



Internal Audit

FINAL

Appendix 3

## South Lakeland District Council

Internal Audit Follow Up Report

2019/20

November 2019

## Executive Summary

### Introduction

- This follow up review by TIAA established the management action that has been taken in respect of recommendations arising from the internal audit reviews listed below at South Lakeland District Council. The review was carried out in November 2019.

Review	Year
Follow Up – February 2019	2018/19
Housing Benefit	2018/19
Information Governance	2018/19
ICT Cyber Security	2018/19
Homelessness	2018/19
Health and Safety – Property Risks	2018/19

### Key Findings

- The follow up review considered whether the management action taken addresses the control issues that gave rise to the recommendations. The implementation of these recommendations can only provide reasonable and not absolute assurance against misstatement or loss. From the work carried out the following evaluations of the progress of the management actions taken to date have been identified.

Evaluation	Progress in implementing recommendation	Number of Recommendations
Outstanding	The recommendation has not yet been implemented but is still on target to meet its target date.	5
Outstanding	Implementation is in progress but the original target date has not been met.	12

Evaluation	Progress in implementing recommendation	Number of Recommendations
<b>Outstanding</b>	<b>There is no tangible evidence that the recommendation is being progressed.</b>	-
<b>Completed</b>	<b>The recommendation has been implemented and is now considered closed.</b>	<b>21</b>

3. This review identifies that implementation remains by and large on track; although there has been some slippage, recommendations continue to be implemented.

### Scope and Limitations of the Review

4. The review considered the progress made in implementing the recommendations made in the previous internal audit reports and to establish the extent to which management has taken the necessary actions to address the control issues that gave rise to the internal audit recommendations.
5. The responsibility for a sound system of internal controls rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses that may exist. Neither should internal audit work be relied upon to identify all circumstances of fraud or irregularity, should there be any, although the audit procedures have been designed so that any material irregularity has a reasonable probability of discovery. Even sound systems of internal control may not be proof against collusive fraud.
6. For the purposes of this review reliance was placed on management to provide internal audit with full access to staff and to accounting records and transactions and to ensure the authenticity of these documents.

### Release of Report

7. The table below sets out the history of this report.

<b>Date report issued:</b>	20 <sup>th</sup> November 2019
<b>Date revised report issued:</b>	22 <sup>nd</sup> November 2019

## Detailed Report

### FOLLOW UP

8. Management representations were obtained on the action taken to address the recommendations and limited testing has been carried out to confirm these management representations. The following matters were identified in considering the recommendations that have not been fully implemented:

### THE FOLLOWING RECOMMENDATIONS REMAIN OUTSTANDING

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
1	Insurance	A periodic reconciliation be performed between the system operated by Fleet and the claims system maintained by the Insurance Team to help ensure that all motor insurance work is properly claimed.	2	We will work with Fleet to carry out reconciliations and will monitor the effectiveness of these.	Operational Lead Delivery and Commercial Services	30/01/2018	31/03/2019	Outstanding	19/11/2019	Responsibility for this task will fall to Customer and Commercial Services staff from January 2020 with assistance from Finance staff.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
2	Licensing – Premises & Clubs	The Statement of Licensing Policy be amended to reflect the current application routes.	2	<p>The policy is set by statutory guidance from the Home Office, underpinning this there is an EU service provision directive requiring on line applications and payments.</p> <p>The current IT suppliers do not provide this capability and we have already recognised this as a significant weakness in the current system and is one of the main IT requirements in the new IT solution. This is a key finding of the gap analysis. Due to the work involved and the cost we propose action is deferred until the new IT product is delivered.</p>	Principal Specialist (Environment)	31/12/2018	30/06/2020	Outstanding	21/02/2019	<p>The new system is yet to be developed in line with the Customer Connect programme and the implementation of a digital platform. Once this has been implemented the policy will be updated accordingly.</p> <p>Forms available online for applying for a license and paying are still in development as part of our Customer Connect project.</p> <p>Although this recommendation has not reached its previously revised due date of 31/12/2019, it is not likely to be complete until 30/06/2020.</p>

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
3	Lake Services – Moorings and Encroachments	Proper procedures be developed that evidence ownership of key areas of the service provision.	2	An overall procedure that details responsibilities for the complete process of lake encroachment documentation and ownership is in development. Debt collection is via the Council's agreed procedures and policies. Debt rose sharply during 2011/12 when changes to the method of calculation were made and this led to an over capacity of work for the Legal and Finance teams. The current debt recovery position is very encouraging and the position more secure following a large amount of work by the Legal Team. Challenges are most commonly seen during works to develop sites and as a result of ownership changes. These relate to updated and revised plans and dimensions.	Legal, Governance and Democracy Specialist Finance Lead Specialist Operational Lead Delivery and Commercial Services	31/10/2018	31/01/2020	Outstanding	19/11/2019	A meeting has taken place between officers of the Council and Lambert Smith Hampton to discuss roles and responsibilities.  As part of Customer Connect, the work of the Process Design team is still on-going to ensure it fits with revised structures. A permanent property solicitor is now in post.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
4	Debtors	Procedures be amended to highlight the importance of the existing mitigating controls that address the risk that a separation of duties does not exist between the person raising and the person authorising a sales invoice and the risk that authorisation levels for sales invoices are not defined.	2	There are an increasing proportion of invoices raised through interfaces from other systems, particularly for rents from the Technology Forge system which would complicate the approval process.  The Customer Connect programme includes a full review of all processes. This recommendation will be considered as part of that review.	Operational Lead Support Services	31/03/2019	31/03/2020	Outstanding	19/11/2019	The Service redesign has not yet covered this aspect of processing.
5	Treasury Management	The four clauses listed in Section 5 of the CIPFA Treasury Management in the Public Services: Code of Practice be formally and explicitly adopted by the Council, as recommended by the Code.	3	Agree to change as part of review of Treasury Management Practices and 2019/20 Treasury Management Framework.	Senior Finance Specialist	28/02/2019	30/03/2020	Outstanding	19/11/2019	The draft Treasury Management Strategy for April 2020 is currently being updated and includes the required references.
6	Treasury Management	The 12 Treasury Management Practices in place be updated to comply with the latest version of the CIPFA Treasury Management in the Public Services: Code of Practice.	3	Review of Treasury Management Practices (TMP) to be undertaken this autumn.	Senior Finance Specialist	31/10/2018	30/03/2020	Outstanding	19/11/2019	The draft Treasury Management Strategy for April 2020 is currently being updated and includes the required references.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
7	Use of Agency, Interim and Casual Workers	Controls be strengthened to ensure that casual workers may not successfully seek employee status, for example by virtue of the length of their working relationship with the Council, or by arguing their working hours and patterns can be shown to be set and regular.	2	Agree. Business as Usual HR colleagues will undertake periodic reviews. In line with Customer Connect the use of casual workers will be significantly reduced therefore mitigating current risk.	HR Lead Specialist	31/01/2020	N/A	Outstanding	19/11/2019	<p>The due date for implementation of this recommendation has not yet been reached.</p> <p>SLDC is in the process of ensuring that an EIA is completed as part of the next Pay Policy statement. The NJC is currently in negotiations and the Pay Policy will be finalised once SLDC has further information from NJC, anticipated in the New Year.</p>
8	Use of Agency, Interim and Casual Workers	In line with LGA advice, an assessment of female casual workers be included in any Equality Impact Assessments of pay and reward policies.	2	Agree, these have not taken place previously. Given the fact that there have not been any quality claims in the past two years does not present an immediate risk. However as an EAI is required under the LGA we will commit to ensuring this is carried out in the future.	HR Lead Specialist	31/01/2020	N/A	Outstanding	19/11/2019	<p>The due date for implementation of this recommendation has not yet been reached.</p> <p>SLDC is in the process of ensuring that an EIA is completed as part of the next Pay Policy statement. The NJC is currently in negotiations and the Pay Policy will be finalised once SLDC has further information from NJC, anticipated in the New Year.</p> <p>Charles Officer Senior HR Advisor</p>

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
9	Information Governance	On completion of the Customer Connect programme and once the restructure has taken effect, GDPR refresher training be undertaken and tailored to the requirements of new staff roles.	3	Agreed - current e-learning package to be reviewed in light of new staff roles - notably Customer Contact and Case Management roles. Consult and seek recommendations from Corporate Learning & Development Team. Resources to be made available.	Senior Specialist Performance, Innovation and Commissioning	20/12/2019	31/03/2020	Outstanding	19/11/2019	A draft implementation programme and action plan is being developed with Corporate Learning & Development Team – includes Transition arrangements as part of Customer Connect.  Although the deadline for this recommendation has not yet been reached, a revised deadline has been added to reflect the current progress with the restructure.
10	Cyber Security	The e-learning system introduced to deliver GDPR training also be used to deliver periodic mandatory information security awareness / refresher training both to staff and Council members and followed up by email phishing tests.	2	Agreed for a training package to be developed and used as part of a regular cycle of training for staff.	Senior Specialist Performance, Innovation and Commissioning	31/12/2019	N/A	Outstanding	19/11/2019	The GDPR e-Learning system is in place. Work is underway with the Learning & Development team to develop and deliver information security awareness and refresher training.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
11	Cyber Security	A risk analysis be undertaken of the impact potential cyber threats may have on the Authority which should evaluate both technical and behavioural risk, cover those aspects of ICT delivery contained in the NCSC/CESG 10 steps to Cyber Security and include on-going consideration of security alerts issued by recognised cyber security authorities.	2	Agreed for the risks of Cyber threats to be reviewed at a corporate level using the NCSC 10 steps as a guide.  This should be linked into the business continuity and disaster recovery plans.	Digital Lead Specialist	31/12/2019	N/A	Outstanding	19/11/2019	This recommendation is in progress to be completed by the original deadline.
12	Cyber Security	A cyber security incident response plan be produced identifying the various types of action required to address known threats detailed in the cyber risk analysis, referenced to detailed procedures dealing with the different actions required to the diverse types of security threat to which the Council may be subject.  The arrangements for investigation of cyber incidents be supported by detailed forensic readiness procedures in order to preserve evidence to assist with the investigation and resolution of incidents and lessons learnt recorded.	2	Agreed that a security incident management policy and a corresponding response plan are required.	Digital Lead Specialist	30/09/2019	31/03/2020	Outstanding	19/11/2019	The plan has been drafted but there is more work to do on it. It is proposed that the work done so far is reviewed as part of the Cyber Security audit scheduled for December 2019 and progressed from there. An additional workshop is taking place with the Cumbria Local Resilience Forum in December to help draft a plan for Cumbria.  Revised dates will be agreed as part of the Audit in December based on the work done so far.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
13	Cyber Security	Once in place, the cyber security incident plans and procedures be periodically tested, for example during testing/rehearsal of the corporate business continuity arrangements.  The Audit Committee be made aware of the contents and requirements of the policy, procedures and response plans.	2	The Management Policy and response plan will be shared with Audit Committee when completed.	Digital Lead Specialist	31/12/2019	31/03/2020	Outstanding	19/11/2019	This is delayed; the documents will be shared as soon as they are ready.
14	Homelessness	The working relationship with Cumbria County Council relating to homelessness be documented and agreed by both parties such that the service can provide appropriate, efficient and timely action.	2	Work continues in this area and further partnership sessions are to take place with the CC to improve joint working in the future.	Principal Specialist People	30/09/2019	31/03/2020	Outstanding	19/11/2019	This work is ongoing. There has been recent proposed changes to Supporting People which have been escalated to the CEO and to leader of the Council. The changes have not yet been agreed by County Council's Cabinet and don't go for approval until December 2019.
15	Homelessness	As far as they remain relevant, recommendations from the 2015 internal audit report on the social lettings scheme be implemented once further funding is secured.	3	We were hopeful that we would have received the additional funding as it was a sound application jointly with Eden. Unfortunately the grant wasn't approved and we are seeking further funding to support this work – if that fails we will need to undertake a fundamental review of the current scheme.	Principal Specialist People	31/12/2019	31/03/2020	Outstanding	19/11/2019	SLDC has managed to get the grant via another route. The relevant post-holder within SLDC has only just started. The current schemes are in the process of being reviewed.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
16	Awarding of Grants	An overarching policy on the provision of financial aid be approved which addresses any potential provision of State Aid.	2	Following completion of the review recommended at point 10 above, an overarching policy can be prepared which will set out the broad principles to be taken into account when entering into grant arrangements with an economic activity. This will be completed within 3 months of completion of recommendation 10.	Legal, Governance and Democracy Specialist	31/03/2019	31/03/2020	Outstanding	22/11/2019	The policy is currently being drafted; the delay in completion has been due to staffing changes in the Legal team.
17	Awarding of Grants	Training be delivered to relevant Officers such that State Aid rules and related risks be sufficiently understood and that concerns be reported to a central Council Officer or team.	2	It is considered that training should be offered to Members as well as officers given the potential implications of providing unlawful State Aid. Given the complexities surrounding State Aid, steps have been taken to seek an external training provider.	Legal, Governance and Democracy Specialist	31/12/2018	31/03/2020	Outstanding	22/11/2019	Training is being arranged on State Aid and will be part of a suite of training for Managers and offered to Members.

No.	Audit Title	Recommendation	Priority	Management Response	Responsible Officers	Due Date	Revised Due Date	Status	Last Update	Latest Response
18	Lake Services – Moorings and Encroachments	Invoiced amounts for encroachments be properly determined using accurate encroachment dimensions. Agreements be updated accordingly and invoices raised at correct rates, be they residential or commercial. This proper determination of invoiced amounts be effected more economically via a phased approach, on a case by case basis, rather than a full lake survey.	2	<p>The current Asset Database used by the Council and LSH is in the process of being updated. It is anticipated that this work will be completed by 31<sup>st</sup> December 2018. Budgets are in place to complete this work.</p> <p>Also note that updated plans and dimensions are established whenever works to sites are approved and on completion, when the legal ownership transfers between parties and during the resolution of any dispute process. This has been the case since the registration of the title occurred in 2006.</p>	Operational Lead Delivery and Commercial Services	31/12/2018	30/04/2020	Outstanding	22/11/2019	This recommendation cannot be progressed further until after the implementation of the TF Cloud system; this is anticipated to be in place by April 2020.

## THE FOLLOWING RECOMMENDATIONS HAVE BEEN IMPLEMENTED

Please note that for completed recommendations, role/job titles have not been updated to reflect the current structure.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
19	Health & Safety – Property Risks	Contracts be put in place as soon as possible for the Council's property service work. In the interim, a contractual relationship be established ahead of the full procurement exercises and a timeframe and action plan for procurement of these services be established.	2	Property Services Contract Manager	17/05/2019	N/A	Completed	19/11/2019	These contracts have now been let and have been added to the Contracts Register on 1 <sup>st</sup> August 2019.
20	Bereavement Services	Management should assure themselves that efficiencies relating to future service planning opportunities have been fully explored and actions identified and progressed as appropriate.	2	Community and Leisure Manager Prin. Community Spaces Officer Bereavement Services Officer Assistant Director – Neighbourhood Services	31/12/2016	31/05/2019	Completed	22/11/2019	The Parks and Open Spaces Strategy 2019-2029 was approved by Cabinet in June 2019.
21	Bereavement Services	Management should ensure that adequate arrangements are in place to review and assess the Services future planning arrangements. This could include ensuring provision can be maintained, identifying ways of improving the service and possible cost reductions for the Council.	1	Prin. Community Spaces Officer Assistant Director – Neighbourhood Services	31/12/2016	31/05/2019	Completed	22/11/2019	The Parks and Open Spaces Strategy 2019-2029 was approved by Cabinet in June 2019.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
22	Housing Benefit	Amounts to be written off individual debtor accounts that are in excess of £20,000, regardless of the reason, be approved in line with the requirements of the Financial Procedure Rules.	2	Financial Services Manager	31/12/2019	N/A	Completed	22/11/2019	New authorisation guidance has been issued to relevant staff clarifying who can write-off and the levels of delegation.
23	Housing Benefit	Controls over Discretionary Housing Payment claims be strengthened and brought in line with existing controls by including these claims within the existing review process operating for Housing Benefits, in compliance with the DWP Housing Benefit Quality Assurance Process Good Practice Guide.	3	Benefits Manager	30/09/2019	N/A	Completed	14/11/2019	Procedures have been put in place to ensure consistency in decisions with the introduction of a DHP consideration checklist, breaking down the information that the DHP has been awarded on the basis of. From 01/10/2019, the Benefits Manager is conducting a 4% check on all DHP decisions made which is recorded on the DHP award spreadsheet. There was a slight delay in the introduction due to the departure of the previous DHP Officer and internal restructure.
24	Housing Benefit	A suitable checklist be implemented for each housing benefit decision check performed, not just for decisions determined to be incorrect. This would accord with the DWP Housing Benefit Quality Assurance Process Good Practice Guide.	3	Benefits Manager	30/09/2019	N/A	Completed	14/11/2019	The existing checklist used to detail incorrect decisions is also being used to detail correct decisions which have been checked in accordance with internal quality checking procedures.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
25	Information Governance	The action plan be updated to include timescales, resources and ownership of tasks already identified together with any additional tasks identified in this report; this will provide an understanding of the resources required and timescales involved in order to complete work on the GDPR compliance framework.	2	Data Protection Officer (with advice from Projects & Innovation Officer)	03/05/2019	N/A	Completed	22/11/2019	Progress update: Customer Connect Programme action plan updated to include timescales, resources and ownership of tasks.
26	Information Governance	The RoPA be updated (column AM) to record: <ul style="list-style-type: none"> <li>the specific organisations with whom personal data is shared;</li> <li>the arrangements for sharing data with processors/joint processors.</li> <li>the security of data at rest.</li> </ul>	2	Data Protection Officer	28/06/2019	N/A	Completed	22/11/2019	RoPA updates include link to specific Data Sharing Agreements through Data Sharing Agreement Log; this includes GDPR compliance statements as directed and managed through Data Protection Agreement Log. Both Logs available and accessible via the Data Protection SharePoint as well through RoPA.  Security Incident Policy updated to include security arrangements for Data at Rest. Secure Data Transmission Protocol updated and amended to include security arrangements for Data in Transit. Policy and Protocol available via Information Governance found on Data Protection SharePoint.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
27	Information Governance	The means by which the Council's data retention policy and procedures are to be applied to both digital and documentary records be recorded in local procedure notes held and implemented/evidenced by the responsible data owners, with the specific arrangements for disposal summarised in the RoPA (column BL) and periodically monitored by the DPO.	2	Data Protection Officer (working with Information Asset Owners identified in IAR)	28/06/2019	N/A	Completed	22/11/2019	Records Retention Schedule amended to include specific legislative rationale for retention periods. All statutory, regulatory and service procedures mapped to specific legislative standards. Schedule also mapped to RoPA and Information Asset Register (IAR). Records Retention framework includes Records Management Policy, records handling and classification protocols in support of local procedure to manage and evidence local records creation, retention and disposal arrangements.
28	Information Governance	A procedure for periodic review of the RoPA is required, which should include an updated information data audit completed by Information Asset Owners identified in the IAR.	3	Data Protection Officer (working with Information Asset Owners identified in IAR)	27/09/2019	N/A	Completed	22/11/2019	Information Data Audit Protocol developed and uploaded to Data Protection SharePoint.
29	Information Governance	The suggestions made to the DPO regarding updates to policies and procedures be reviewed and in particular the updates to the data protection and data breach policies be enacted.	3	Data Protection Officer	03/05/2019	N/A	Completed	22/11/2019	The Data Protection Policy has been updated to include links to ICT Incident Management Policy and arrangements as part of data breach reporting protocol and procedures.
30	Information Governance	The suggestions made to the DPO regarding routine maintenance and consolidation of the GDPR SharePoint site be reviewed, and in particular multiple copies of a DPIA template be rationalised to ensure that the latest version of the template is used consistently across the Council.	3	Data Protection Officer	03/05/2019	N/A	Completed	22/11/2019	The Data Protection SharePoint site has been tidied up to ensure consistency of documentation.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
31	Information Governance	<p>The suggestions made to the DPO regarding updates to Privacy notices be reviewed and in particular:</p> <ul style="list-style-type: none"> <li>• The Corporate Privacy notice published on the Council's web site be updated to make reference to the Council's data retention policy and procedures.</li> <li>• The privacy notice for staff be updated to include all data subject access rights.</li> </ul>	3	Data Protection Officer	28/06/2019	N/A	Completed	22/11/2019	The Corporate Privacy Notice has been amended to make reference to Council's Records Retention procedures. Staff Privacy Notice to be updated to include subject access rights.
32	Information Governance	A link to the location of the Assessment of Legitimate interests be entered in the RoPA at Column AV.	3	Data Protection Officer	28/06/2019	N/A	Completed	22/11/2019	A Legitimate Interest Assessment Protocol has been developed and is in place. The documents are available via Data Protection SharePoint.
33	Information Governance	A record of consent be maintained by the DPO and periodically reviewed and confirmed that consent is still given by the data subject, with a link to the location of the record of consent entered in the RoPA at Column AZ. Data subjects be clearly notified of the arrangements for withdrawal of consent.	3	Data Protection Officer	28/06/2019	N/A	Completed	22/11/2019	A Consent Log and protocol have been developed and in are in place. Links available through Data Protection SharePoint. The documents are available via Data Protection SharePoint.
34	Information Governance	An overarching Data Protection Impact Assessment framework be established, with the production of DPIAs and resources required for this being included in business transformation plans.	3	Data Protection Officer	27/12/2019	N/A	Completed	22/11/2019	A Data Protection Impact Assessment Protocol and framework have been developed and are in place. The documents are available via Data Protection SharePoint.

No.	Audit Title	Recommendation	Priority	Responsible Officer	Due Date	Revised Due Date	Status	Last Update	Latest Response
35	Cyber Security	ISO 27002, the international standard for information security policies, be used as a checklist to ensure the completeness of operational policy/procedures.	2	IT Services Manager Information Governance Officer	30/09/2019	N/A	Completed	22/11/2019	The documentation has been completed and is now subject to regular reviews and updates as part of business as usual.
36	Cyber Security	The Acceptable Use Policy be updated to include treatment of issues and risks such as phishing scams, malicious links, malign websites, malware and other cyber threats.	2	IT Services Manager	31/03/2019	N/A	Completed	22/11/2019	The policy has been updated.
37	Cyber Security	The utilisation of the intrusion detection and prevention functionality provided by the firewall software be explored, the rationale for which will be an outcome of the cyber risk analysis referred to at Recommendation 4 and the implementation of which will inform the incident response plan referred to at Recommendation 7.	3	IT Services Manager	30/09/2019	N/A	Completed	22/11/2019	The intrusion detection and prevention functionality has been reviewed.
38	Cyber Security	Changes to firewall rules be recorded in the helpdesk or in a management spreadsheet and approved.	3	IT Services Manager	21/01/2019	N/A	Completed	22/11/2019	A spreadsheet is utilised on SharePoint to record, review and approve firewall changes.
39	Homelessness	Section 1(4) of the Homelessness Act 2002 be complied with, in that the Council ensures it publishes a Homelessness Strategy every five years.	2	Public Protection Manager	30/06/2019	N/A	Completed	22/11/2019	Action completed. The policy has been adapted to ensure this requirement is met.

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