



Internal Audit

FINAL

South Lakeland District Council

Follow Up Review

2021/22

April 2022

Executive Summary

Introduction

1. This follow up review by TIAA established the management action that has been taken in respect of the recommendations arising from the internal audit reviews listed below at South Lakeland District Council. The review was carried out in March 2022.

Review	Year	Date Presented to Audit Committee
Follow-up – November 2021	2021/22	8 th December 2021
Information Governance	2021/22	8 th December 2021
Treasury Management	2021/22	8 th December 2021
Customer Connect – ‘My Account’	2021/22	8 th December 2021

Key Findings & Action Points

2. 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	Number of Recommendations
Implemented	10
Outstanding	27
Considered but not Implemented / No longer applicable	1
Not Implemented	-

3. The key issue identified is that although there has been some slippage, most recently due to COVID-19 and Local Government Reform, recommendations continue to be implemented. Of the 38 recommendations in this report, 26% have either been implemented or have been superseded by substantially similar recommendations on more recent reports. Of the 27 recommendations that remain outstanding, 81% are due to slippage beyond the original implementation date and 19% are because the original implementation date has not yet arrived. One recommendation will not now be implemented as it is no longer applicable, due to recent changes in practice.

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 established 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.

Disclaimer

7. The matters raised in this report are only those that came to the attention of the auditor during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Release of Report

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

Date draft report issued:	25 th March 2022
Date management responses rec'd:	4 th April 2022
Date final report issued:	4 th April 2022
Revised final report issued:	8 th April 2022

Executive Summary

Follow Up

9. 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:

10. **Follow-up – November 2021**

Audit title	Licensing – Premises & Clubs	Audit year	2017/18	Priority	2
Recommendation	The Statement of Licensing Policy be amended to reflect the current application routes.				
Initial management response	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. 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.				
Responsible Officer/s	Principal Specialist (Health & Environment)	Original implementation date	31/12/2018	Revised implementation date(s)	31/12/2020 31/10/2021 31/12/2021
Latest Update	The Principal Specialist (Health & Environment) advised that the action remains outstanding but that progress has been made with higher priority application forms, several of which are due to go live before end of March (TENS, Hackney Carriage Vehicle, Private Hire Vehicle). These will be followed by driver applications as the next priority.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Awarding of Grants	Audit year	2017/18	Priority	2
Recommendation	An overarching policy on the provision of financial aid be approved which addresses any potential provision of State Aid.				
Initial management response	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.				
Responsible Officer/s	Legal, Governance and Democratic Services Specialist	Original implementation date	31/03/2019	Revised implementation date(s)	31/03/2020 31/03/2021 31/12/2021
Latest Update	Draft documentation regarding the Subsidy Control regime and compliance has been prepared and a workshop has been held with relevant officers to discuss principles/approach. The Subsidy Control Bill, which will provide the framework for a new UK-wide subsidy control regime, is anticipated to take effect later in 2022. It is proposed therefore that work / documentation planned as part of this recommendation needs to align with the new Bill (which is potentially subject to further amendments at this stage). The proposed new implementation date is, therefore, subject to the legislation coming into force and further updates will be provided as necessary.				
New implementation date	30/09/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Debtors	Audit year	2018/19	Priority	2
Recommendation	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.				
Initial management response	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.				
Responsible Officer/s	Finance Lead Specialist	Original implementation date	31/03/2019	Revised implementation date(s)	31/03/2020 30/06/2021 30/11/2021 31/01/2022
Latest Update	The Case Management Team Leader (Support Services) previously advised that further delays to the service redesign, notably due to the Local Government Reform, would suggest that the previously advised due date of 31/01/2022 will not now be met and that a further revision to 31/03/2022 would be more realistic. The update received during this review was that this task has now been taken over by the Finance Lead Specialist who advises that this will be addressed as part of the design of day 1 services for the Westmorland and Furness Council.				
New implementation date	31/03/2023	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Household Waste Collection	Audit year	2019/20	Priority	3
Recommendation	Current terms of reference for the Waste and Recycling Project Board be formulated and subject to periodic review and approval.				
Initial management response	Review at next Project Board meet with input from Simon and Sion.				
Responsible Officer/s	Operational Lead for Delivery and Commercial Services/ Principal Street Scene Officer	Original implementation date	September 2019	Revised implementation date(s)	31/03/2021 30/06/2021 30/09/2021 30/06/2022
Latest Update	The Delivery and Commercial Officer (Delivery and Commercial Services) advised that the Waste and Recycling Project Board has now been superseded by the Local Government Review Waste Working Group. The recommendation is, therefore, no longer applicable.				
New implementation date	No longer applicable	Status	No longer applicable	The recommendation is no longer applicable.	

Audit title	Contract Management	Audit year	2019/20	Priority	1
Recommendation	A guidance procedure be developed to provide responsible officers with a framework for managing and monitoring their contracts.				
Initial management response	Noted that this is the case. Updated guidance procedure to be developed and implemented in line with recommendations 11 and 9.				
Responsible Officer/s	Finance Lead Specialist & Procurement Specialist	Original implementation date	31/05/2020	Revised implementation date(s)	31/12/2020 31/12/2021 31/01/2022
Latest Update	The Procurement Specialist stated that procurement regulations have been updated and the guidance is in progress but there is further slight slippage.				
New implementation date	30/04/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Contract Management	Audit year	2019/20	Priority	2
Recommendation	The contract management and procedure documents be updated to reflect the new procurement and contract management processes within the Council.				
Initial management response	Noted and agreed. There is conflicting policy information which is leading to poor practice. Currently liaising with Strategy Specialist.				
Responsible Officer/s	Procurement Specialist	Original implementation date	31/12/2020	Revised implementation date(s)	31/05/2021 31/10/2021 31/01/2022
Latest Update	The Procurement Specialist stated that these are being currently revised, as Procurement Procedure Rules have been published.				
New implementation date	30/04/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Contract Management	Audit year	2019/20	Priority	2
Recommendation	A standard format for all contract files be developed including a contract risk register.				
Initial management response	Noted and agreed. Although there are some template documents the portfolio needs to be increased and included in the training.				
Responsible Officer/s	Procurement Specialist	Original implementation date	31/05/2020	Revised implementation date(s)	31/12/2020 31/05/2021 31/10/2021
Latest Update	The Procurement Specialist stated documentation has been reviewed by the Procurement Team and that the implementation date stands.				
New implementation date	31/03/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Leisure Services	Audit year	2019/20	Priority	3
Recommendation	A risk register for third party contracts be developed to reduce the risk of non-compliance of contract monitoring, as stated within the Contract Management Policy.				
Initial management response	Risk Register to be created for this contract.				
Responsible Officer/s	Operational Lead Delivery and Commercial Services	Original implementation date	01/09/2020	Revised implementation date(s)	30/06/2021 01/01/2022
Latest Update	The Operational Lead Delivery and Commercial Services has confirmed that a meeting is being held with Leisure Services on 13/04/2022 where the Risk Register will be prepared and signed off.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Insurance	Audit year	2020/21	Priority	3
Recommendation	The Annual Renewal of Insurance Contract Procedure be updated.				
Initial management response	Accepted, work will be undertaken in the summer to update policy and procedures.				
Responsible Officer/s	Finance Specialist and Deputy S151 Officer	Original implementation date	30/09/2021	Revised implementation date(s)	-
Latest Update	The Finance Specialist and Deputy S151 Officer previously advised that the process will be reviewed and updated as the annual renewal process is carried out over the next three to six months and is now being incorporated into the processes for LGR				
New implementation date	31/03/2023	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Creditor Payments	Audit year	2020/21	Priority	3
Recommendation	A detailed Financial Scheme of Delegation table be included in the Financial Procedures.				
Initial management response	Authorisation limits are currently set within the Integra system so when POs are raised they are sent to the authoriser with the relevant limit. We are currently developing a self-serve SharePoint page incorporating easy to use guidance and access to a Crystal Report detailing all authorisers and their limits. The finance procedures will be updated to reference the information on SharePoint.				
Responsible Officer/s	Specialist (Finance), Finance Lead Specialist	Original implementation date	30/06/2021	Revised implementation date(s)	30/09/2021 31/12/2021
Latest Update	The Specialist (Finance) advised that this recommendation relates to the introduction of the Finance self-service page on the Intranet and is still awaiting a timeline for implementation from the IT department. It is acknowledged that several update requests have been submitted to the IT department in this regard, but action is still outstanding.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Creditor Payments	Audit year	2020/21	Priority	3
Recommendation	The Financial Procedures document be updated to include references to the Government's Prompt Payment Code and any other regulations relating to the prompt settlement of invoices.				
Initial management response	A link to the Government's Prompt Payment Code will be added to the Finance self-serve SharePoint page, again with reference to this added into the finance procedure rules.				
Responsible Officer/s	Specialist (Finance), Finance Lead Specialist	Original implementation date	30/06/2021	Revised implementation date(s)	30/09/2021 31/12/2021
Latest Update	The Specialist (Finance) advised that this recommendation relates to the introduction of the Finance self-service page on the Intranet and is still awaiting a timeline for implementation from the IT department. It is acknowledged that several update requests have been submitted to the IT department in this regard, but action is still outstanding.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Disabled Facilities Grants	Audit year	2020/21	Priority	3
Recommendation	The Disabled Facilities Grant Policy be reviewed in accordance with its stated review cycle.				
Initial management response	The Disabled Facilities Grant Policy will be reviewed in 2021 to 2022. This will include a consultation period before the revised Policy goes through the relevant approval process.				
Responsible Officer/s	Amanda Pharaoh (Specialist – Housing)	Original implementation date	31/03/2022	Revised implementation date(s)	
Latest Update	A revised policy has now been drafted. This is intended to be presented at Cabinet on 08/06/2022 for approval.				
New implementation date	30/09/2022	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Disabled Facilities Grants	Audit year	2020/21	Priority	3
Recommendation	The Disabled Facilities Grant Policy be enhanced to include: its link to Council priorities; and more explicit service standards.				
Initial management response	The Disabled Facilities Grant Policy will be reviewed in 2021 to 2022. This will include a consultation period before the revised Policy goes through the relevant approval process.				
Responsible Officer/s	Amanda Pharaoh (Specialist – Housing)	Original implementation date	31/03/2022	Revised implementation date(s)	
Latest Update	A revised policy has now been drafted. This is intended to be presented at Cabinet on 08/06/2022 for approval.				
New implementation date	30/09/2022	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Asset Management	Audit year	2020/21	Priority	2
Recommendation	A set of procedure notes be prepared which cover all aspects of fixed asset management including the following: accounting and depreciation; maintenance and repairs; security and insurance; investment and budgeting; verification and audit; valuation and impairment cycles by asset class; and asset management systems used.				
Initial management response	Agreed. A multi-disciplinary group has meet to discuss the practicality of this. Initially the procedure notes will concentrate on the higher-value assets, with some assets prepared later (e.g. museum collection).				
Responsible Officer/s	Finance Lead Specialist supported by IT Shared Service Manager and Operational Lead for Delivery and Commercial Services	Original implementation date	31/12/2021	Revised implementation date(s)	31/03/2022
Latest Update	The Finance Lead Specialist stated that Officers have met and agreed the process and some elements of the task are completed. Additional requests related to LGR may reduce the resources available to fully conclude this recommendation and it is now more likely to be completed by the end of the financial year.				
New implementation date	31/03/2023 in readiness for the new Council and as part of the LGR Assets work package.	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Contract Management	Audit year	2021/22	Priority	2
Recommendation	Paragraph 5 of Article 14 to the Constitution be followed in that contracts over £60,000 be under seal. Paragraph 25.1 of the Contract Procedure Rules be followed in that contracts over £10,000 be in writing. Paragraph 25.4.8 be followed in that contracts over £60,000 shall include a consideration of the need for liquidated damages.				
Initial management response	Instruction to be issued to Assets and Commercial team to adhere to Contract procedure rules and no works to commence on site without contract being in place.				
Responsible Officer/s	Operational Lead for Delivery and Commercial Services	Original implementation date	31/08/2021	Revised implementation date(s)	
Latest Update	An update was provided to the Audit Committee December 2021 meeting by Delivery and Commercial Services (Appendix 3(a) item AUD/25) noting that actions have been taken to ensure that the constitution and procedure rules will be adhered to and if required exemptions and approvals will be sought in future.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Procurement	Audit year	2021/22	Priority	2
Recommendation	In compliance with the Local Government (Transparency Requirements) (England) Regulations 2015, procurement information be published on a quarterly basis. In line with a recommendation of the Local Government Transparency Code 2015, consideration be given to publishing this data at least monthly.				
Initial management response	The Specialist-Performance, Innovation and Commissioning will look at the process for publication with the Caseworker for Freedom of Information. URL links will be tested and the information will be published on a quarterly basis. Monthly publication has been considered, but may be unachievable due to LGR workload issues.				
Responsible Officer/s	Specialist –Performance, Innovation and Commissioning	Original implementation date	31/12/2021	Revised implementation date(s)	-
Latest Update	The Specialist –Performance, Innovation and Commissioning advised that In line with Local Government (Transparency Requirements) (England) Regulations 2015 procurement information will be published on the Council website. Work will continue with the Caseworker for Freedom of Information, Business Process Analysts and Web Development Team. URL links will be tested and the information will be published on a quarterly basis in readiness for the start of 2022/23 financial year.				
New implementation date	01/04/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

11. Information Governance

Audit title	Information Governance	Audit year	2021/22	Priority	2
Recommendation	Regular meetings of the Information Governance Group be reintroduced.				
Initial management response	Agree – quarterly meetings of SLDC Information Governance Board to be reintroduced.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	31/12/2021	Revised implementation date(s)	
Latest Update	The Cumbria Information Governance/ Data Protection Officer Working Group supports the strategic oversight and direction to the development and operation of the Cumbria Local Government Reorganisation Data and Intelligence Hub in order to achieve the overarching aims of establishing approaches to information sharing (governance and technical) across the programme. The Cumbria Information Governance/ Data Protection Officer Working Group is chaired by the Performance, Innovation and Commissioning Specialist. The Information Governance Group will be set up in line with the Shadow Authority arrangements and Part 3 18(2)(e) and (f) of the Cumbria (Structural Changes) Order 2022.				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Information Governance	Audit year	2021/22	Priority	2
Recommendation	To ensure all staff have an appropriate level of data protection awareness, appropriate mandatory training be put in place for all staff with attendance recorded.				
Initial management response	Agree with recommendations – linked to Information and Cyber Security Audit Recommendations - 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, and a training package to be developed and used as part of a regular cycle of training for staff.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	01/04/2022	Revised implementation date(s)	
Latest Update	<p>On target – in accordance with approved Procurement Schedule – CEX/129 – as approved at Cabinet 03/02/2021: Full Security Awareness Platform (rather than just e-learning or a phishing tool) to help drive culture and user behaviour changes.</p> <ul style="list-style-type: none"> • Combination of awareness formats catered for: Videos, Courses, Phishing Simulation, Policies, Posters, Screen-Saver & Newsletters. • Consistent and Up-To-Date library of short video content available in multiple languages. • Fusion Course Creation Engine allows for courses to be tailored and customised to the needs of the business and individual, high risk groups. • Newsletter/Blog engine to deliver best practice guidance directly to user’s inboxes. • Mature and Automated AD User Provisioning system to allow content targeting to react to changes within South Lakeland District Council. 				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	The overarching Data Protection Policy be updated to include the hierarchy of documentation to highlight supporting guidance, protocols, procedures and policies.				
Initial management response	Agree – Data Protection Policy to be updated to include the hierarchy of documentation across all data protection and information governance framework documents.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	31/12/2021	Revised implementation date(s)	
Latest Update	The overarching Policy will be updated to include the hierarchy of documentation to highlight supporting guidance, protocols, procedures and policies in line with the Shadow Authority arrangements and Part 3 18(2)(e) and (f) of the Cumbria (Structural Changes) Order 2022.				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	A Data Protection training needs analysis be undertaken to identify roles that would benefit from additional training due to their additional Data Protection / Information Governance responsibilities and appropriate training be delivered.				
Initial management response	Agree with recommendations – linked to Information and Cyber Security Audit Recommendations - 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, and a training package to be developed and used as part of a regular cycle of training for staff.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	01/04/2022	Revised implementation date(s)	
Latest Update	<p>On target – in accordance with approved Procurement Schedule – CEX/129 – as approved at Cabinet 03/02/2021:</p> <p>Full Security Awareness Platform (rather than just e-learning or a phishing tool) to help drive culture and user behaviour changes.</p> <ul style="list-style-type: none"> • Combination of awareness formats catered for: Videos, Courses, Phishing Simulation, Policies, Posters, Screen-Saver & Newsletters. • Consistent and Up-To-Date library of short video content available in multiple languages. • Fusion Course Creation Engine allows for courses to be tailored and customised to the needs of the business and individual, high risk groups. • Newsletter/Blog engine to deliver best practice guidance directly to user’s inboxes. • Mature and Automated AD User Provisioning system to allow content targeting to react to changes within South Lakeland District Council. 				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	The review and maintenance of the RoPA and IAR be conducted annually as stated in the Information Data Audit procedure.				
Initial management response	Agree – current RoPA and IAR to be reviewed. Procedural documentation to be established to ensure annual review and maintenance is stated and implemented.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	01/04/2022	Revised implementation date(s)	
Latest Update	<p>In accordance with approved Procurement Schedule – CEX/129 – as approved at Cabinet 03/02/2021:</p> <ul style="list-style-type: none"> • Develop a Council wide Business Classification Scheme (BCS). A platform for an improved information architecture forming an essential component of the information governance framework. A fit for purpose BCS to enhance activity: Grouping information; supporting retrieval of records relating to a function or activity; assigning access rights and security protection and assigning retention periods and disposal. 				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	A general description of technical and organisational security measures be included within SLDC's processing documentation.				
Initial management response	Agree – current RoPA to be reviewed. Procedural documentation to be established to ensure annual review and maintenance is stated and implemented.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	01/04/2022	Revised implementation date(s)	
Latest Update	<p>In accordance with approved Procurement Schedule – CEX/129 – as approved at Cabinet 03/02/2021:</p> <ul style="list-style-type: none"> Develop a Council wide Business Classification Scheme (BCS). A platform for an improved information architecture forming an essential component of the information governance framework. A fit for purpose BCS to enhance activity: Grouping information; supporting retrieval of records relating to a function or activity; assigning access rights and security protection and assigning retention periods and disposal. 				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date will not be met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	Subject Access Requests be completed within the required one month timescale or an extension agreed.				
Initial management response	Agree – Subject Access Request protocol and procedures to be updated in line with recommendation.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	31/12/2021	Revised implementation date(s)	
Latest Update	No further update was provided for this review.				
New implementation date	01/06/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Information Governance	Audit year	2021/22	Priority	3
Recommendation	The responsibility for cover of the DPO's duties when unavailable be delegated and documented.				
Initial management response	Agree – DPO delegated duties to be documented. Details to be approved through SLDC Information Governance Board.				
Responsible Officer/s	Performance, Innovation and Commissioning Specialist	Original implementation date	01/04/2022	Revised implementation date(s)	
Latest Update	No further update was provided for this review.				
New implementation date		Status	Outstanding	The original implementation date has not yet arrived.	

12. Treasury Management

Audit title	Treasury Management	Audit year	2021/22	Priority	2
Recommendation	The contract with Link Treasury Services Limited, which ended on 31 st March 2021, be formally extended to cover the ongoing service provision.				
Initial management response	This was overlooked during a busy period. The contract will be formally extended as soon as possible.				
Responsible Officer/s	Finance Lead Specialist	Original implementation date	31/12/2021	Revised implementation date(s)	
Latest Update	This task is still outstanding and is being resolved for both 2021/22 and 2022/23.				
New implementation date	31/05/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

Audit title	Treasury Management	Audit year	2021/22	Priority	3
Recommendation	The Council's Treasury Management Practices be updated and then reviewed periodically.				
Initial management response	Will be included as part of the approval process for the 2022/23 Treasury Management Strategy to be considered by Council in February 2022.				
Responsible Officer/s	Finance Specialist (Deputy s151 Officer)	Original implementation date	22/02/2022	Revised implementation date(s)	
Latest Update	This will be included in the Treasury Management Annual Report to Cabinet in June 2022 and Council in July 2022				
New implementation date	31/07/2022	Status	Outstanding	Implementation is in progress but the original target date has not been met.	

13. **Customer Connect – ‘My Account’**

Audit title	Customer Connect – ‘My Account’	Audit year	2021/22	Priority	2
Recommendation	Privacy Impact Assessments be completed for My Account and the ESB technology platform including any other related or interfacing systems.				
Initial management response	Some progress on PIA, need to complete and ensure built into day to day activity.				
Responsible Officer/s	Head of Shared ICT Operational Lead for Customer and Locality	Original implementation date	31/03/2022	Revised implementation date(s)	
Latest Update	-				
New implementation date		Status	Outstanding	Implementation is in progress but the original implementation date has not yet arrived.	

Audit title	Customer Connect – ‘My Account’	Audit year	2021/22	Priority	2
Recommendation	The arrangements for system(s) ownership and information / system security be agreed and formalised. This could be based around a hierarchy of responsibilities including the retention of the RAPID, ‘Design Authority’ decision making process.				
Initial management response	<p>1. System Ownership: Part of the changes to the project delivery have improved the understanding of responsibility and accountability across the project team and upwards to Leadership. We have two product owners who take a lead in defining the priorities and requirements which has helped structure the work into a more defined plan. The Digital product owns spans both SLDC and Eden and ensures that a consistent approach to the platform is adopted.</p> <p>2. Information Security: This will be driven as a result of the PIA process as mentioned in the above recommendation for both SLDC and Eden. This will be enhanced as per the above recommendation.</p> <p>3. Decision Making Process: Any decisions/issues that need escalated above the project team will be to Head of ICT and Operational Lead for Customer and Locality. Head of ICT also sits on Leadership across both SLDC and Eden. Any design decisions are part of this process and the appropriate method for resolving them is implemented whether this be RAPID or alternative.</p>				
Responsible Officer/s	Head of Shared ICT Operational Lead for Customer and Locality	Original implementation date	1. Complete 2. 31/03/2022 3. Complete	Revised implementation date(s)	
Latest Update	-				
New implementation date		Status	Outstanding	Implementation is in progress but the original implementation date has not yet arrived.	

14. The following recommendations have been implemented.

Audit Title	Recommendation	Priority	Responsible Officer	Due Date
Contract Management	All projects be identified prior to the start of the new financial year.	3	Finance Lead Specialist with Procurement Specialist	31/03/2020
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	Operational Lead Delivery and Commercial Services	30/01/2018
NNDR	A review of resources be undertaken and an action plan be developed to address the backlog of work and to ensure that there are adequate resources going forward.	2	Operational Lead – Case Management	30/06/2021
Council Tax	A review of resources be undertaken and an action plan be developed to address the backlog of work and to ensure that there are adequate resources going forward.	2	Operational Lead – Case Management	30/06/2021
Contract Management	Contract Procedure Rules be followed for each procurement exercise unless a Request For Exemption From The Contract Procedure Rules Form has been properly completed and approved.	2	Operational Lead for Delivery and Commercial Services	31/08/2021
Lake Services	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	Operational Lead for Delivery and Commercial Services	31/03/2022
Procurement	Contract Procedure Rules be followed for each procurement exercise unless a Request For Exemption From The Contract Procedure Rules form has been properly completed and approved.	2	Procurement Specialist	31/12/2021
Procurement	Request For Exemption From The Contract Procedure Rules forms be held in a single location visible to all Officers who would need access. Only one form be used to evidence all required authorisations.	2	Procurement Specialist	31/12/2021
Treasury Management	Links from the Council's Fund Management web page and the Policies and Plans web page to the Treasury Management Framework and the Treasury Management Strategy be kept up-to-date.	3	Finance Lead Specialist	Implemented

Audit Title	Recommendation	Priority	Responsible Officer	Due Date
Customer Connect – ‘My Account’	A project plan be compiled for the ongoing roll-out of My Account on-line forms and processes. The development of transaction streams within My Account be prioritised within an overall SLDC project / programme portfolio. Note: This recommendation will need to be viewed in the context of the proposed Local Government Reorganisation in Cumbria.	2	Head of Shared ICT Operational Lead for Customer and Locality	Implemented