

East Herts Council

Performance, Audit and Governance Scrutiny Committee 22 January 2019

Shared Internal Audit Service – Progress Report

Recommendation

Members are recommended to:

- a) Note the Internal Audit Progress Report
- b) Note the Status of Critical and High Priority Recommendations

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1. Introduction and Background

Purpose of Report

- 1.1 This report details:
 - a) The progress made by the Shared Internal Audit Service (SIAS) in delivering the Council's 2018/19 Internal Audit Plan as at 4 January 2019.
 - b) The findings for the period to 4 January 2019.
 - c) The implementation status of previously agreed Internal Audit recommendations.
 - d) An update on performance management information as at 4 January 2019.

Background

- 1.2 The 2018/19 Internal Audit Plan was approved by the Performance, Audit and Governance Scrutiny Committee on 13 March 2018. The Performance, Audit and Governance Scrutiny Committee receive periodic updates of progress with delivering the Internal Audit Plan.
- 1.3 The work of Internal Audit is required to be reported to a Member Body so that the Council has an opportunity to review and monitor an essential component of corporate governance and gain assurance that its internal audit provision is fulfilling its statutory obligations. It is considered good practice that progress reports also include proposed amendments to the agreed Internal Audit Plan.

2. Internal Audit Plan Update

Delivery of Internal Audit Plan and Key Audit Findings

- 2.1 As at 4 January 2019, 62% of the 2018/19 Internal Audit Plan days have been delivered (calculation excludes contingency days that have not been allocated).
- 2.2 As at 4 January 2019, the following 2018/19 projects have been finalised:

| Audit Title | Date of Issue | Assurance Level | Number of Recommendations |
|--------------------------------|---------------|--------------------|--------------------------------|
| Payroll Pension Certificate | April 2018 | NA | NA |
| Freedom of Information | July 2018 | Satisfactory | Three Medium, One Low/Advisory |
| Business Grants | Aug 2018 | Limited | Four Medium, One Low/Advisory |
| Performance Mgmt. / | Aug 2018 | Satisfactory | One Medium, One |

| Data Quality | | | Low/Advisory |
|-----------------------------|----------|--------------|----------------------------------|
| CCTV (joint internal audit) | Aug 2018 | Limited | Nine High * |
| DFG Certification | Oct 2018 | NA | NA |
| Contract Management | Nov 2018 | Limited | Four Medium, One Low/Advisory |
| Council Tax | Nov 2018 | Good | None |
| S106 Spend Arrangements | Nov 2018 | Limited | Three High, Two Medium |
| Development Management | Dec 2018 | Satisfactory | One Medium, One Low/Advisory |
| Agency Staffing | Dec 2018 | Satisfactory | One Medium, One Low/Advisory |
| Housing Benefits | Jan 2019 | Good | None |

^{*} While owned by the CCTV partnership as a whole, the recommendations from the CCTV audit are primarily recorded and reported on within the Audit Committee papers for Stevenage Borough Council as the lead authority for the audit. They have thus been excluded from the total number of recommendations set out at para 2.9 below, but have been included for information at Appendix B.

2.3 The table below summarises the overall position with regard to 2018/19 projects as at 4 January 2019. Appendix A provides a status update on each individual project within the 2018/19 Internal Audit Plan. Details of indicative start dates for the individual projects are also shown in Appendix C.

| Status | No of Audits at this Stage | % of Total Audits |
|------------------------|----------------------------|-------------------|
| Final Report Issued | 12 | 37% |
| Draft Report Issued | 4 | 13% |
| In Fieldwork/Review | 4 | 13% |
| In Planning/ToR Issued | 9 | 28% |
| Allocated | 2 | 6% |
| Cancelled | 1 | 3% |

| Total | 32 | 100% |
|-------|----|------|
|-------|----|------|

2.4 The following 2017/18 project has also been finalised in the period since the last progress report to Performance, Audit and Governance Scrutiny Committee:

| Audit Title | Date of Issue | Assurance Level | Number of Recommendations |
|------------------|---------------|--------------------|--|
| Cyber Security * | Sept 2018 | Limited | Three High, Two Medium, Three Merits Attention |

^{*} The above audit was included in the annual audit opinion for 2017/18 and is therefore not included in the performance figures for 2018/19. The three high priority recommendations are contained in Appendix B.

Critical and High Priority Recommendations

- 2.5 A final Internal Audit report is issued when agreed by management. This includes an agreement to implement recommendations that have been made. It is SIAS's responsibility to bring to the attention of Members the implementation status of critical and high priority recommendations; it is the responsibility of officers to implement the recommendations by the agreed date.
- 2.6 The current position in respect of existing outstanding critical and high priority recommendations is shown at Appendix B.

Proposed Internal Audit Plan Amendments

- 2.7 The following changes to the 2018/19 Internal Audit Plan have already been approved by this Committee.
 - a) Land Charges audit cancelled and days returned to contingency.
 - b) CCTV joint internal audit resourced from contingency.

No further changes have been proposed since the last progress report to this Committee.

Performance Management

- 2.8 Annual performance indicators and associated targets were approved by the SIAS Board in March 2018 and are reviewed annually.
- 2.9 The actual performance for East Herts Council against the targets that can be monitored in year is set out in the table below.

| Performance Indicator | Annual Target | Profiled Target | Actual to 4 Jan 2019 |
|---|------------------|-------------------------|---------------------------|
| 1. Planned Days – percentage of actual billable days against planned chargeable days completed (excluding unused contingency) | 95% | 61% (212 / 347 days) | 62% (214.5 / 347 days) |

| 2. Planned Projects – percentage of actual completed projects to draft report stage against planned completed projects | 95% | 61% (19 / 31 projects to draft) | 52% (16 / 31 projects to draft) | |
|--|------|---------------------------------------|---------------------------------------|--|
| 3. Client Satisfaction – percentage of client satisfaction questionnaires returned at 'satisfactory' level | 100% | 100% | 100% (4 returned to date) | |
| 4. Number of Critical and High Priority Audit Recommendations Agreed | 95% | 95% | 100% (3 High priority agreed) * | |

^{*} This figure excludes the 9 high priority recommendations from the CCTV audit and the 3 high priority recommendations from the Cyber Security audit as per paragraphs 2.2 and 2.4 above.

APPENDIX A: PROGRESS AGAINST THE 2018/19 INTERNAL AUDIT PLAN

| AUDITADI E ADEA | LEVEL OF | ı | REC | 3 | AUDIT | LEAD | BILLABLE DAYS | STATUS/COMMENT |
|--|--------------|---|-----|----|-------|---------------------|---------------|---------------------|
| AUDITABLE AREA | ASSURANCE | Н | M | LA | DAYS | AUDITOR ASSIGNED | COMPLETED | STATUS/COMMENT |
| Key Financial Systems – 77 days | | | | | | | | |
| Asset Management | | | | | 10 | Yes | 0.5 | ToR Issued |
| Council Tax | Good | 0 | 0 | 0 | 6 | Yes | 6 | Final Report Issued |
| Creditors | | | | | 10 | Yes | 0.5 | ToR Issued |
| Debtors | | | | | 10 | Yes | 0.5 | ToR Issued |
| General Ledger | | | | | 10 | Yes | 0.5 | ToR Issued |
| Housing Benefits & Rent Allowances | Good | 0 | 0 | 0 | 6 | Yes | 6 | Final Report Issued |
| NDR | | | | | 6 | Yes | 6 | Draft Report Issued |
| Payroll | | | | | 12 | Yes | 3 | In Fieldwork |
| Payroll Certificate | NA | 0 | 0 | 0 | 1 | Yes | 1 | Complete |
| Treasury Management | | | | | 6 | Yes | 0.5 | ToR Issued |
| Operational Audits – 124 days | | | | | | | | |
| Development Management | Satisfactory | 0 | 1 | 1 | 12 | Yes | 12 | Final Report Issued |
| S106 Agreements (spend arrangements) | Limited | 3 | 2 | 0 | 10 | Yes | 10 | Final Report Issued |
| Business Grants Scheme | Limited | 0 | 4 | 1 | 8 | Yes | 8 | Final Report Issued |
| Performance Mgmt. / Data Quality | Satisfactory | 0 | 1 | 1 | 10 | Yes | 10 | Final Report Issued |
| Land Charges | | | | | 1 | N/A | 1 | Cancelled |
| Freedom of Information | Satisfactory | 0 | 3 | 1 | 8 | Yes | 8 | Final Report Issued |
| GDPR – PIR | | | | | 10 | Yes | | Draft Report Issued |
| Homelessness Reduction Act / Temporary Accommodation | | | | | 12 | Yes | 0 | Allocated |
| Houses in Multiple Occupation (HMOs) | | | | | 10 | Yes | 10 | Draft Report Issued |
| Herts Home Improvement Agency | | | | | 2 | Yes | 2 | In Quality Review |
| Digital East Herts | | | | | 12 | Yes | 9 | In Fieldwork |

| AUDITABLE AREA | LEVEL OF | ı | REC | S | AUDIT | LEAD | BILLABLE DAYS | STATUS/COMMENT |
|--|--------------|----|----------|-----------|------------------|------|---------------|---------------------|
| AUDITABLE AREA | ASSIDANCE | | ASSIGNED | COMPLETED | STATUS/COMINIENT | | | |
| Agency Staffing | Satisfactory | 0 | 1 | 1 | 12 | Yes | 12 | Final Report Issued |
| Commercialisation / Income Generation | | | | | 12 | Yes | 0.5 | In Planning |
| DFG Capital Grant Certification | NA | 0 | 0 | 0 | 1 | Yes | 1 | Complete |
| CCTV – joint internal audit | Limited | 9* | 0 | 0 | 2 | Yes | 2 | Final Report Issued |
| Garden Town - Project Assurance | | | | | 2 | Yes | 1.5 | In progress |
| Procurement – 29 days | | | | | | | | |
| Waste Contract – client services, trade waste | | | | | 15 | Yes | 0.5 | In Planning |
| Compliance Monitoring Contract | | | | | 2 | Yes | 0.5 | In Planning |
| Contract Management | Limited | 0 | 4 | 1 | 12 | Yes | 12 | Final Report Issued |
| IT Audits – 30 days | | | | | | | | |
| Cyber Security | | | | | 6 | Yes | 0 | Allocated |
| Incident Management | | | | | 6 | Yes | 0.5 | In Planning |
| Mobile Device Management and BYOD | | | | | 6 | Yes | 6 | Draft Report Issued |
| TSS Improvement Plan - Governance | | | | | 12 | Yes | 10 | In Fieldwork |
| Shared Learning – 8 days | | | | | | | | |
| Shared Learning Newsletters / Summary Themed Reports / Joint Reviews | | | | | 8 | N/A | 2 | In Progress |
| Risk Management – 0 days | | | | | | | | |
| No audits | | | | | | | 0 | |
| Anti-Fraud – 3 days | | | | | | | | |
| Anti-Fraud – Controls Review | | | | | 3 | N/A | 0 | Through Year |
| Strategic Support – 51 days | | | | | | | | |
| 2019/20 Audit Planning | | _ | | | 10 | N/A | 7 | In Progress |

| AUDITADI E ADEA | LEVEL OF | ı | RECS | | AUDIT | LEAD | BILLABLE DAYS | CTATUC/COMMENT |
|---|-----------|---|------|----|--------------|---------------------|---------------|-------------------|
| AUDITABLE AREA | ASSURANCE | Н | М | LA | PLAN DAYS | AUDITOR ASSIGNED | COMPLETED | STATUS/COMMENT |
| Audit Committee | | | | | 12 | N/A | 8.5 | Through Year |
| Client Meetings | | | | | 10 | N/A | 7 | Through Year |
| Liaison with External Audit | | | | | 1 | N/A | 0.5 | Through Year |
| Head of Internal Audit Opinion 2017/18 | | | | | 4 | N/A | 4 | Complete |
| Plan Monitoring | | | | | 9 | N/A | 6.5 | Through Year |
| Ad-hoc Advice | | | | | 2 | N/A | 1 | Through Year |
| SIAS Development | | | | | 5 | N/A | 5 | Through Year |
| Contingency – 15 days | | | | | | | | |
| Contingency | | | | | 13 | N/A | 0 | Not yet allocated |
| Follow Ups – 3 days | | | | | | | | |
| Follow up of priority recommendations | | | | | 3 | N/A | 2 | Through Year |
| 2017/18 Projects requiring completion – 20 days | | | | | | | | |
| Various | | | | | 20 | Yes | 20 | Complete |
| EHC TOTAL | | 3 | 16 | 6 | 360 | | 214.50 | |

^{*} While owned by the CCTV partnership as a whole, the recommendations from the CCTV audit are primarily recorded and reported on within the Audit Committee papers for Stevenage Borough Council as the lead authority for the audit. They have thus been excluded from the total number of recommendations, but have been included for information at Appendix B.

APPENDIX B: IMPLEMENTATION STATUS OF HIGH PRIORITY RECOMMENDATIONS

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|--|---|--|-------------------------|--|--|
| 1. | CCTV - joint review led by Stevenage Borough Council (2018/19) - These recommendations and their implementation status are overseen and monitored by Stevenage Borough Council as the lead authority, but are included here for Member information. | We recommend that the governance framework for the overall CCTV Partnership is reviewed and confirmed as being fit for purpose, or changed as necessary, and is clearly understood by all parties, including the respective roles and responsibilities of the relevant Members and Officers. | We will draft a governance framework for the overall CCTV arrangements to include: - Governance for Hertfordshire CCTV Partnership - Governance for Hertfordshire CCTV Partnership Ltd Governance lines between the Partnership and the Company - Member roles and responsibilities -Officer roles and responsibilities These will be consulted on and agreed by the CCTV Joint | CCTV Joint Executive and Company Board of Directors. | 1 December 2018. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|--|---|---|--------------------------------------|-------------------------|--|--|
| | | | Executive and the Company Board of Directors. | | | | |
| 2. | CCTV - joint review (2018/19) As above. | We recommend that an appropriate new Partnership Agreement between the current four CCTV Partner Authorities is drawn up and executed. It should clearly include the specific roles and responsibilities of the Partner Authorities. It should also clearly state the relationship the Partner Authorities have with Hertfordshire CCTV Partnership Ltd. and the function of that company in respect of the overall CCTV Partnership. | We will prepare an updated CCTV Partnership Agreement drafted through the CCTV Officer Management Board to be signed by all four Partner Authorities. | CCTV Officer Management Board. | 31 March 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |
| 3. | CCTV - joint review (2018/19) As above. | We recommend that the current Shareholders' Agreement for the Company is reviewed to ascertain if it remains fit for purpose | The Company Directors' will consider this recommendation through their Shareholder Representatives | Company Board of Directors. | 31 March 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|--|--|--|---|-------------------------|--|--|
| | | and, if so, that the terms are fully complied with. | in light of future considerations relating to the future of Hertfordshire CCTV Partnership Ltd. | | | | |
| 4. | CCTV - joint review (2018/19) As above. | We recommend that appropriate revised / new Terms of Reference for the CCTV Joint Executive and the CCTV Officer Management Board are drawn up and formally agreed. | Terms of Reference will be updated for the CCTV Joint Executive and a Terms of Reference will be created for the CCTV Officer Management Board. | CCTV Joint Executive and CCTV Officer Management Board. | 31 March 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |
| 5. | CCTV - joint review (2018/19) As above. | We recommend that, once agreed, the revised/new Terms of Reference for the CCTV Joint Executive and the CCTV Officer Management Board are revised / added in the Constitutions for each of the four Partner Authorities, together with the | New Terms of Reference will be submitted for formal incorporation into constitutional arrangements for the four Partner Authorities. | Each of the four Partner Authorities. | 31 July 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|--|---|---|-------------------------|--|--|
| | | updated Member/Officer representation for both groups. | | | | | |
| 6. | CCTV - joint review (2018/19) As above. | We recommend that a new five year Business Plan for the overall CCTV Partnership is drawn up and agreed. As a minimum, the plan should be monitored on a monthly basis in terms of achievements against projections and it should be the subject of a full review and refresh annually to cover the next five years ahead on a rolling basis. Besides financial projections, it should include nonfinancial aims and targets that should be monitored, reviewed and refreshed on the same basis. | We will develop a new five year rolling Business Plan (with monthly monitoring and full annual reviews) for the overall Hertfordshire CCTV Partnership based on decisions about the future direction of Hertfordshire CCTV Partnership Ltd. | CCTV Joint Executive and Company Board of Directors. | 31 July 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |
| 7. | CCTV - joint review | We recommend that the role and | The role of the SBC Group | CCTV Officer Management | 31 July 2019. | This is a new addition and the management | Not yet implemented – |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|--|--|--|---|-------------------------|--|--|
| | (2018/19) As above. | responsibilities of the SBC Group Accountant in respect of the overall CCTV Partnership are reviewed, evaluated and formerly confirmed. Consideration should be given to increased use of the external Accountants with regard to the accounting requirements of Hertfordshire CCTV Partnership Ltd. | Accountant in relation to the overall Partnership will be clarified in the revised Partnership Agreement. The Company Directors will consider the accountancy needs of the Company and source appropriately. | Board, Company Board of Directors and SBC Assistant Director, Finance & Estates. | | response opposite is therefore the latest comment. | continue to monitor. |
| 8. | CCTV - joint review (2018/19) As above. | We recommend that all reporting arrangements for the Partner Authorities are formally reassessed, agreed and documented to ensure there is complete clarity and transparency of expectations and understanding across all interested parties | Authority reporting arrangements to be included as part of a revised Partnership Agreement, Shareholder Agreement and Terms of Reference as necessary. | CCTV Joint Executive, CCTV Officer Management Board and Company Board of Directors as appropriate. | 31 July 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|--|---|---|-------------------------|--|--|
| | | regarding the need, responsibility, frequency, timing, content, format and distribution of each report required. | | | | | |
| 9. | CCTV - joint review (2018/19) As above. | We recommend that there is a review of how charges are being calculated and billed to the Partner Authorities, clarification of who is responsible for this and agreement of the timing. | A schedule of charges to be prepared for the Partnership. The schedule will identify recharges applied to the Partnership, including; staffing, overheads, IT, etc. The schedule will also include recharges applied to Hertfordshire CCTV Partnership Ltd. A quarterly finance report to be prepared for the CCTV Officer Management | SBC Assistant Director, Finance & Estates. | 1 November 2018. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---------------------------------|--|--|--|-------------------------|--|--|
| | | | year-end financial projections for the Partnership. | | | | |
| 10. | Cyber Security (2017/18) | The Council must define its position regarding its ability to identify and manage devices that are connecting to its IT network. A solution must be able to manage devices that have physically connected to the Councils' IT networks. Devices that have connected to the network should be reviewed and, where they are found to have not been authorised, they should be removed. The solution should include the use of personal devices to connect to the IT network. Furthermore, management should | This will be resolved with the correct solution not only for devices but also for ports on all devices that need to be restricted. | Strategic ICT Partnership Manager. | 31 March 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---------------------------------|--|--|--|-------------------------|--|--|
| | | put arrangements in place to monitor network access on a regular basis. | | | | | |
| 11. | Cyber Security (2017/18) | Management should perform a full review of the Councils' perimeter firewall rules and, where necessary, remove inactive or unnecessary rules unless explicitly required. The 'Any' rules should be replaced with port object groups that contain an explicit set of ports as required for the rule. Management should also ensure that all users that have access and can make changes to any of the Councils' external firewall rules have individual accounts and should put arrangements in place for monitoring all | The majority of the council's firewalls need replacing and part of that work will require the correct configuration and management. ICT Partnership Manager has been tasked to restructure the ICT department and as part of that to have dedicated security and network staff to resolve and maintain control of these areas. | Strategic ICT Partnership Manager. | 31 March 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---------------------------------|---|--|--|-------------------------|---|--|
| | | configuration changes. Furthermore, management should establish a record of how all firewalls, both internal and external, have been configured and should review the rules for appropriateness on a routine basis. | | | | | |
| 12. | Cyber Security (2017/18) | Management must complete the action on the IT Improvement Plan to migrate all IT services and systems onto servers that are running supported operating systems. Furthermore, the Councils' patch management procedures should be approved and made available to all relevant members of staff. | This is in the current work schedule which means that all servers running supported OS will be removed from the network by the end of September. | Strategic ICT Partnership Manager. | 30 September 2018. | This is a new addition. November 2018 - The council is now running supporting operating systems and software. IT also has ongoing plans to move off operating systems which will be going out of support in coming years. IT has automated patch management where possible, and where not these are manually applied by ICT staff. In general all staff need to know is when they need to | Partially implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|---|---|---------------------------------------|-------------------------|--|-------------------------------|
| | | | | | | reboot devices, so outside of ICT there is no requirement for staff to see or approve patch management procedures. | |
| 13. | S106 Spend Arrangements (2018/19) | Departmental and individual roles and responsibilities in relation to the end to end process for S106 agreements, including the spend arrangements, are made clear and they are documented. This should incorporate senior management oversight of operating effectiveness, including appropriate use of risk registration and budgetary control processes. | This area had already raised concerns and as a result, a Section 106 Programme Manager is currently being recruited to oversee the entire process from initial agreement negotiation, project allocation, internal authorisation, monitoring, collection and mobilisation of funds. A programme of works for all activities will also | Deputy Chief Executive Officer. | Complete. | This is a new addition and the management response opposite is therefore the latest comment. | Implemented. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|---|---|---------------------------------------|-------------------------|--|--|
| | | | be monitored and managed by this officer, and monthly reporting will commence. Further to this will be the full process mapping of Section 106 and allocation of R&Rs within each specific service area as part of these works. | | | | |
| 14. | S106 Spend Arrangements (2018/19) | Record keeping of S106 contributions, the spend arrangements and associated timeframes be reviewed to confirm fitness for purpose. An effective master record is adopted for monitoring and reporting purposes. | There currently exist a number of records relating to different areas of Section 106. These include our planning system – Uniform, our finance system – Advanced and a further Excel based database. It is recognised that there exists some gaps in these and a full | Deputy Chief Executive Officer. | April 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---|---|---|---------------------------------------|-------------------------|--|--|
| | | | audit of contained data has commenced and a single harmonised database will be established to provide monitoring triggers, fund allocation and reporting. | | | | |
| 15. | S106 Spend Arrangements (2018/19) | The Council establish a sound legal position in respect of any time expired contributions. Contributions due to expire in the near future are subject to urgent consideration and remedial action where required. | All mentioned funding had already been highlighted internally and work on the pertinent contributions is ongoing to ensure application. Before any final allocation any project would be scrutinised by our legal team to ensure complicity with all relevant | Deputy Chief Executive Officer. | February 2019. | This is a new addition and the management response opposite is therefore the latest comment. | Not yet implemented – continue to monitor. |

| No. | Report Title / Date of Issue | Recommendation | Management Response | Responsible Officer | Original Target Date | Management Comments | SIAS Comment (Jan 2019) |
|-----|---------------------------------|----------------|--|------------------------|-------------------------|------------------------|-------------------------------|
| | | | contractual requirements and stipulations. A S106 Officer group has also been established to oversee allocation. | | | | |

APPENDIX C: INTERNAL AUDIT PLAN ITEMS - INDICATIVE START DATES AGREED WITH MANAGEMENT

| Apr | May | Jun | July | Aug | Sept |
|--|---|--|---|---|---|
| Payroll Annual Pension Certificate (Complete) | Business Grants Scheme (Final Report Issued) | Freedom of Information (Final Report Issued) | GDPR – PIR (Draft report Issued) | S106 (Final Report Issued) | Home Improvement Agency (In QR) |
| | Contract Mgmt. (Final Report Issued) | Agency Staffing (Final Report Issued) | Land Charges (Cancelled) | HMOs (Draft Report Issued) | Development Mgmt. (Final Report Issued) |
| | Mobile Device Mgmt. and Bring Your Own Device (Draft Report Issued) | Performance Mgmt. / Data Quality (Final Report Issued) | | | Digital East Herts (In Fieldwork) |
| | CCTV – joint audit (Final Report Issued) | | | | |
| Oct | Nov | Dec | Jan | Feb | Mar |
| Council Tax (Final Report Issued) | NDR (Draft Report Issued) | Debtors (ToR Issued) | Creditors (ToR Issued) | HRA & Temporary Accommodation (Allocated) | |
| Housing Benefits (Final Report Issued) | Payroll (In Fieldwork) | Asset Mgmt. (ToR Issued) | Waste Contract (In Planning) | TSS Improvement Plan – Cyber Security (Allocated) | |
| Commercial / Income Generation (In Planning) | Compliance Monitoring Contract – joint audit (In Planning) | Main Accounting (ToR Issued) | TSS Improvement Plan - Incident Mgmt. (In Planning) | | |
| DFG Capital Grant Certification (Complete) | TSS Improvement Plan – Governance (b/f from Jan) (In Fieldwork) | | Treasury Mgmt. (ToR Issued) | | |

APPENDIX D: ASSURANCE DEFINITIONS/PRIORITY LEVELS

| Assurance Level | Definition | |
|-----------------|--|--|
| Good | The design and operation of the internal control framework is effective, thereby ensuring that the key risks in scope are being well managed and core objectives will likely be achieved. There are minor reportable audit findings. | |
| Satisfactory | The internal control framework is largely working well in managing the key risks in scope, with some audit findings related to the current arrangements. | |
| Limited | The system of internal control is only partially effective, with important audit findings in key areas. Improvement in the design and/or operation of the control environment is necessary to gain assurance risks are being managed to an acceptable level, and core objectives will be achieved. | |
| No | The system of internal control has serious gaps, and controls are not effective in managing the key risks in scope. It is highly unlikely that core objectives will be met without urgent management intervention. | |

| Priority Level | | Definition |
|----------------|----------------|--|
| Corporate | Critical | Audit findings which, in the present state, represent a serious risk to the organisation as a whole, i.e. reputation, financial resources and / or compliance with regulations. Management action to implement the appropriate controls is required immediately. |
| Service | High | Audit findings indicate a serious weakness or breakdown in control environment, which, if untreated by management intervention, is highly likely to put achievement of core service objectives at risk. Remedial action is required urgently. |
| | Medium | Audit findings which, if not treated by appropriate management action, are likely to put achievement of some of the core service objectives at risk. Remedial action is required in a timely manner. |
| | Low / Advisory | Audit findings indicate opportunities to implement good or best practice, which, if adopted, will enhance the control environment. The appropriate solution should be implemented as soon as is practically possible. |