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<b>Report To:</b>	<b>Audit Committee</b>	<b>Date:</b>	<b>22.10.19</b>
<b>Report By:</b>	<b>Corporate Director Environment Regeneration and Resources</b>	<b>Report No:</b>	<b>AC/11/19/SA/APr</b>
<b>Contact Officer:</b>	<b>Andi Priestman</b>	<b>Contact No:</b>	<b>01475 712251</b>
<b>Subject: INTERNAL AUDIT PROGRESS REPORT – 29 JULY TO 27 SEPTEMBER 2019</b>			

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## 1.0 PURPOSE

- 1.1 The purpose of this report is to enable members to monitor the performance of Internal Audit, to discharge their scrutiny and performance monitoring roles and gain an overview of the overall control environment throughout the Council.
- 1.2 The Monitoring Report from 29 July to 27 September 2019 is attached as an Appendix **Appendix 1** to this report since its content is essential to the understanding of the Council's control environment.

## 2.0 SUMMARY

- 2.1 There were two internal audit reports finalised since the last Audit Committee meeting in August 2019:
- FMS Logical Access Controls
  - Waste Management
- 2.2 These reports contained 7 issues categorised as follows:

<b>Red</b>	<b>Amber</b>	<b>Green</b>
0	1	6

- 2.3 The fieldwork for the 2019/20 plan is underway and the current status of the plan is as follows:

<b>Stage</b>	<b>Number of Reports</b>
Final Report	2
Draft Report	0
Fieldwork Complete	1
Fieldwork in Progress	5
Planning	2
Not started	4
<b>Total</b>	<b>14</b>

- 2.4 In relation to Internal Audit follow up, there were no items due for completion by 30 September 2019. The current status report is attached at Appendix 2. **Appendix 2**
- 2.5 The CMT has reviewed and agreed the current status of actions.

### **3.0 RECOMMENDATIONS**

- 3.1 It is recommended that Members agree to note the progress made by Internal Audit in the period from 29 July to 27 September 2019.

**Scott Allan**  
**Corporate Director Environment, Regeneration and Resources**

## 4.0 BACKGROUND

- 4.1 In April 2019, the Audit Committee approved the current Internal Audit Annual Plan which detailed a programme of activity to be undertaken during 2019-20.
- 4.2 Internal Audit regularly reports findings and action plans to relevant Council Officers and the Audit Committee as part of the annual audit plan. A follow up process is in place to allow follow up of current internal audit actions to be co-ordinated and updated by Internal Audit on a monthly basis with regular reporting to CMT and the Audit Committee.

## 5.0 CURRENT POSITION

- 5.1 There were 2 internal audit reports finalised since the last Audit Committee meeting in August 2019:
- FMS Logical Access Controls
  - Waste Management
- 5.2 The fieldwork for the 2019/20 plan is underway and the current status of the plan is as follows:

Stage	Number of Reports
Final Report	2
Draft Report	0
Fieldwork Complete	1
Fieldwork in Progress	5
Planning	2
Not started	4
<b>Total</b>	<b>14</b>

- 5.3 There are 7 current action points being progressed by officers. There were no action points due for completion by 30 September 2019.
- 5.4 The CMT has reviewed and agreed the current status of actions.

## 6.0 IMPLICATIONS

### Finance

- 6.1 There are no direct financial implications arising from this report.

Financial Implications:

### One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

<b>Cost Centre</b>	<b>Budget Heading</b>	<b>With Effect from</b>	<b>Annual Net Impact</b>	<b>Virement From (If Applicable)</b>	<b>Other Comments</b>
N/A					

**Legal**

6.2 There are no direct legal implications arising from this report.

**Human Resources**

6.3 There are no direct HR implications arising from this report.

**Equalities**

6.4 There are no direct equalities implications arising from this report.

**Repopulation**

6.5 There are no direct repopulation implications arising from this report.

**7.0 CONSULTATIONS**

7.1 Relevant officers have been consulted in the preparation of this report.

**8.0 LIST OF BACKGROUND PAPERS**

8.1 File of completed internal audit reports: Available from Andi Priestman, Chief Internal Auditor.



**Audit Committee Report  
Report on Internal Audit Activity from  
29 July to 27 September 2019**

<b>Section</b>	<b>Contents</b>	<b>Page</b>
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1 Audit work undertaken in the period

Reports issued since last update

1.1 In each audit, one of 4 overall opinions is expressed:

<b>Strong</b>	In our opinion there is a <b>sound</b> system of internal controls designed to ensure that the organisation is able to achieve its objectives.
<b>Satisfactory</b>	In our opinion <b>isolated</b> areas of control weakness were identified which, whilst not systemic, put some organisation objectives at risk.
<b>Requires improvement</b>	In our opinion <b>systemic and/or material</b> control weaknesses were identified such that some organisation objectives are put at significant risk.
<b>Unsatisfactory</b>	In our opinion the control environment was considered <b>inadequate</b> to ensure that the organisation is able to achieve its objectives.

1.2 Detailed findings and recommendations reported to management are currently graded using the following criteria:

<b>Red</b>	<ul style="list-style-type: none"> <li>In our opinion the control environment is insufficient to address the risk and this could impact the Council as a whole.</li> <li>Corrective action must be taken and should start immediately.</li> <li>Overseen to completion by Corporate Management Team.</li> </ul>
<b>Amber</b>	<ul style="list-style-type: none"> <li>In our opinion there are areas of control weakness which we consider to be individually significant but which are unlikely to affect the Council as a whole.</li> <li>Corrective action must be taken (some exceptions may be agreed with IA) within reasonable timeframe.</li> <li>Overseen to completion by Head of Service.</li> </ul>
<b>Green</b>	<ul style="list-style-type: none"> <li>In our opinion the risk area is well controlled or our audit highlighted areas for minor control improvement and/or areas of minor control weakness.</li> <li>Process improvements/efficiencies may be actioned at management discretion in consultation with Internal Audit (IA).</li> <li>Managed by service owner.</li> </ul>

1.3 There were 2 audit reviews finalised since the August Audit Committee, which are identified below, together with a summary of the gradings of the issues identified. In Section 2 we have provided a summary of the main findings from the reviews.

Reports finalised since previous Audit Committee	Grading			Total Number of Issues
	Red	Amber	Green	
FMS Logical Access Controls	0	0	5	5
Waste Management	0	1	1	2
<b>Total</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>7</b>

**Other activities**

**Risk Management**

- 1.4 Risk Management is the subject of separate reporting to Audit Committee and a full report is submitted separately on an annual basis.

**Internal Audit Action Plan Follow Up**

- 1.5 The current status of Internal Audit Action plans is set out as an attachment at Appendix 2 to this report.

**2 Summary of main findings from reports issued since previous Audit Committee**

- 2.1 We have provided below a summary of the key findings from the final reports issued after 27 July 2019.

**FMS Logical Access Controls**

- 2.2 As part of an external auditor's report on the 2016/17 audit, a significant fraud was referred that had been perpetrated against Dundee City Council. The report stressed the wider lessons from this incident for other Councils to consider is the important of key internal controls. A key area which was identified for review was Logical Access Controls over the financial management system.
- 2.3 The objective of this audit was to provide management and the Audit Committee with an assessment of the adequacy and effectiveness of the governance, risk management and controls over the key risks faced by Inverclyde Council in relation to logical access within FMS.
- 2.4 The review will focus on the high level processes and procedures in relation to FMS logical access controls and will concentrate on identified areas of perceived higher risk, such as not ensuring logical access to FMS is adequately controlled and monitored.
- 2.5 The overall control environment opinion for this audit review was **Satisfactory**. Five GREEN issues were identified which if implemented by management would enhance the control environment.
- 2.6 An action plan was agreed and all issues will be addressed by 31 October 2019.

**Waste Management**

- 2.7 The Service delivers a comprehensive range of waste management services including household and trade waste collection, civic amenity site operations and recycling bring sites. A range of disposal services are procured from the private sector. These include haulage and disposal of residual waste to landfill, management and operation of the materials recycling facility and the treatment of organic waste.
- 2.8 The objective of this audit was to provide management and the Audit Committee with an assessment of the adequacy and effectiveness of the governance, risk management and controls surrounding the key risks faced by Inverclyde Council in relation to Waste Management.



## 2 Summary of main findings from reports issued since previous Audit Committee (Continued)

2.9 The review focused on the high level processes and procedures in relation to Waste Management and concentrated on identified areas of perceived higher risk, such as income and expenditure relating to waste streams is not valid, or is not completely and accurately recorded.

2.10 The audit excluded the following:

- the operation of recycling carried out by outsourced company Ward Ltd, but covered the contract management process;
- the collection of waste electronic and electrical equipment as there is no cost to the council for this service as all companies who sell electrical goods must provide a collection and disposal service under the WEEE regulations; and
- low value waste streams where no formal contract was required.

2.11 The overall control environment opinion for this audit review was **Satisfactory**. There was one AMBER issues identified as follows:

### Adequacy of Contract Monitoring Procedures

Within the Environmental & Public Protection Service, a central spreadsheet exists which sets out current price and contract details for all waste streams. A matching exercise is carried out to ensure that the invoice details match the entry on the financial management system prior to authorising the invoice. However, discussions with staff and audit testing identified that:

- for each of the 11 waste streams reviewed, there are no checks to ensure that the contracted rates match the invoice;
- for gully and street sweeping and hard plastics waste streams, there are no formal contracts in place. We understand that the arrangements for gully and street sweeping were originally treated through the refuse transfer station operation. The new dewatering facility commissioned at Pottery Street as part of the depot rationalisation project has effectively separated this material and a contract will be put in place; and
- for textiles and footwear, testing identified that the pricing structure had not been updated on the central spreadsheet for the current contract dated 1<sup>st</sup> April 2018. The previous contract pricing from 2014 had been used instead. Management have re-performed the invoice calculation using the correct pricing structure which shows an underclaim of £8,884.31 over the 15 month period. The textile contractor has been made aware of the error and an invoice has now been issued by the Council.

Where a check of the contract price is not carried out, there is a risk that inaccurate, incomplete or invalid entries are not identified when authorising invoices.

Where a formal contract is not in place, there is a risk that the service may be breaching the council's Standing Orders relating to contracts. There is also a risk that additional invalid charges could be made or the service is not of high quality.

Where incorrect contract pricing is used to recover income, income due to the council is not fully recovered.

2.12 The review identified 2 issues, one of which we consider to be individually significant and an action plan is in place to address all issues by 31 January 2020.

**3. Audit Plan for 2019/2020 – Progress to 27 September 2019**

<b>Planned Audit Cover</b>	<b>Not started</b>	<b>Planning</b>	<b>TOR Issued</b>	<b>Fieldwork in Progress</b>	<b>Fieldwork Complete</b>	<b>Draft Report</b>	<b>Report Finalised</b>	<b>Reported to Audit Committee</b>
<b>Risk-Based Reviews</b>								
HSCP Contract Management		✓	✓	✓	✓	✓	✓	August 2019
Governance of Community Groups	✓							
Safe Recruitment		✓	✓	✓	✓			
Refugee Integration Scheme	✓							
Waste Management		✓	✓	✓	✓	✓	✓	October 2019
IR35 (c/f 2018-2019)		✓	✓	✓				
<b>Limited Scope Financial Reviews</b>								
Sundry Debtors	✓							
<b>Corporate Fraud Reviews</b>								
Tipping Permits	✓							
Residents Parking Scheme		✓						
Employee Expenses – Quarterly Checks		N/A	N/A	✓				
<b>Regularity Audits</b>								
Stock/Inventory Control – Quarterly Checks		N/A	N/A	✓				
Education Control Self-Assessment (CSA)		✓						
Corporate Purchase Cards – Quarterly Checks		✓	✓	✓				
<b>Project Assurance</b>								
SWIFT Replacement Project	CIA providing quality assurance to project Board.							
Business Support Redesign	CIA providing quality assurance to project Board.							
<b>Corporate Governance</b>								
Annual Governance Statement 2018-2019	Complete - Input provided by CIA.							
<b>Other Work</b>								
Council Tax Reduction Scheme/Discounts/Exemptions	Visits are carried out on establish the validity of discounts and exemptions – see section 4							
National Fraud Initiative	Work on the 2018/19 Data Matching Exercise is underway.							
SPOC Liaison with DWP	Ongoing – see paragraph 4 for detailed activity.							
Inverclyde IJB	Internal Audit annual audit plan for 2019/2020 was approved in April 2019 – 45 days allocated to IJB audit plan.							

**4 Corporate Fraud Activity**

4.1 The undernoted table sets out progress to date on corporate fraud activity in the period 29 July to 27 September 2019:

<b>Council Tax Reduction Scheme 29 July to 27 September 2019</b>					
<b>Number of Home Visits</b>		<b>Number of Errors Identified and Corrected</b>		<b>Total Overpayment/Future Savings</b>	
45		0		£0	
<b>Council Tax Reduction Scheme – Year to Date</b>					
<b>Number of Home Visits</b>		<b>Number of Errors Identified and Corrected</b>		<b>Total Overpayment/Future Savings</b>	
83		25		£29,316/£18,913	
<b>National Fraud Initiative 2018-2019 Exercise</b>					
Matches have now been received and a detailed review of matches is now underway by Internal Audit and Services.					
Matches received	Number Investigated	No issues	Fraud	Error	Value of Fraud/Error
<b>Housing Benefit</b>					
385	384	372	11	1	£18,283.03
<b>Blue Badge</b>					
201	201	84	0	117	£0
<b>Care Homes</b>					
45	45	45	0	0	£0
<b>Personal Budgets</b>					
7	7	7	0	0	£0
<b>Council Tax Reduction Scheme</b>					
735	681	674	3	4	£1,588.95
<b>Procurement</b>					
38	38	38	0	0	£0
<b>Payroll</b>					
67	58	58	0	0	£0
<b>Creditors</b>					
1254	51	51	0	0	£0
<b>VAT</b>					
56	0	0	0	0	£0
<b>TOTALS</b>					
<b>2788</b>	<b>1465</b>	<b>1329</b>	<b>14</b>	<b>122</b>	<b>£19,871.98</b>
<b>Recheck Report – Single Person Discount</b>					
1218	1107	1085	15	7	£23,078
<b>Stock and Inventory Quarterly Checks – 2019-2020</b>					
Fieldwork is underway.					
<b>Employee Expenses Quarterly Checks – 2019-2020</b>					
Fieldwork is underway.					

**4 Corporate Fraud Activity (Continued)**

4.2 Specific NFI cases being reviewed by Corporate Fraud since the last Audit Committee are set out below:

<b>File Ref</b>	<b>Description</b>	<b>Status</b>
18/19 18-09	CT SPD > Pension (Recheck report)	Passed to Finance for adjudication.
18/19 18-84	CT SPD > State Benefits (Recheck report)	Passed to Finance for adjudication.
18/19 18-109	CT SPD > State Benefits (Recheck report)	Passed to Finance for adjudication.
18/19 18-110	CT SPD > Taxi Drivers (Recheck report)	Passed to Finance for adjudication.
18/19 18-191	Fraudulent Application for CT Exemption	Passed to Finance for adjudication 13/2/19
19/20 19-17	Recheck SPD > Waiting List/ Market Traders/State Benefits	Fraud established. Account updated and liable party rebilled.
19/20 19-20	Recheck SPD > Payroll	Account updated for correct exemption. No financial impact.
19/20 19-22	Recheck SPD > Taxi Drivers	Fraud established. Account updated and liable party rebilled.
19/20 19-34	Recheck SPD > Payroll	Passed to Finance for adjudication.
19/20 19-40	Recheck SPD > Taxi Drivers	Passed to Finance for adjudication 17/5/19.
19/20 19-58	Recheck SPD > State Benefits/ Pension	Fraud established. Account updated and liable party rebilled.
19/20 19-71	Recheck SPD > Payroll/Pension	Passed to Finance for adjudication 8/8/19.
19/20 19-72	Recheck SPD > Payroll/Pension	Passed to Finance for adjudication.
19/20 19-84	Recheck SPD > Deferred Pension	Passed to Finance for adjudication 8/8/19.
19/20 19-95	Recheck SPD > Payroll	Passed to Finance for adjudication 21/8/19.
19/20 19-100	CTR > Payroll	Closed – error identified and corrected.
19/20 19-120	CTR > Payroll	Closed – no fraud detected.
19/20 19-121	CTR > DWP Deceased	Error identified and record updated. No financial impact.
19/20 19-122	CTR > Payroll	Ongoing investigation.
19/20 19-123	CTR > Payroll	Ongoing investigation.
19/20 19-124	CTR > Payroll	Ongoing investigation.
19/20 19-126	CTR > Payroll	Ongoing investigation.
19/20 19-139	CTR > Pension	Ongoing investigation.
19/20 19-140	Payroll > Creditors	Ongoing investigation.
19/20 19-141	CTR > Pension	Ongoing investigation.
19/20 19-142	CTR > Pension	Ongoing investigation.

4 Corporate Fraud Activity (Continued)

File Ref	Description	Status
19/20 19/143	CTR > Pension	Fraud established. Account updated. Reduction in weekly benefits.
19/20 19/144	CTR > Pension	Ongoing Investigation.
19/20 19/145	CTR > Pension	Fraud established. Account updated and liable party rebilled.
19/20 19-146	CTR > Pension	Closed – error identified. No financial impact.
19/20 19-147	CTR > Payroll	Ongoing investigation.
19/20 19-148	CTR > Pension	Ongoing investigation.
19/20 19-149	CTR > Pension	Closed – error identified. No financial impact.
19/20 19-150	Creditors > Payroll	Ongoing investigation.
19/20 19-151	HB/CTR > Pension	Ongoing investigation.
19/20 19-152	CTR > Pension	Ongoing investigation.
19/20 19-154	CTR > Pension	Ongoing investigation.
19/20 19-159	CTR > Pension	Ongoing investigation.
19/20 19-160	CTR > Pension	Ongoing investigation.
19/20 19-161	CTR > Pension	Passed to Finance for adjudication 10/9/19.
19/20 19-162	CTR > Pension	Passed to Finance for adjudication 23/8/19.
19/20 19-163	CTR > CTR	Fraud established. Account updated and CTR has been adjusted. Case has been referred to debt recovery.
19/20 19-168	Recheck SPD > Pension	Error identified. Account updated. No financial impact.
19/20 19-169	Recheck SPD > Payroll	Ongoing investigation.
19/20 19-170	Recheck SPD > DWP/Taxi Drivers	Closed – no fraud detected.
19/20 19-171	Recheck SPD > Payroll	Ongoing investigation.
19/20 19-172	Recheck SPD > Deferred Pension/ Payroll	Ongoing investigation.

4.3 **SPOC Liaison 29/7/19 – 27/9/19**

DWP Referrals	16 this period	30 to date
LAIEF requests actioned	16 this period	36 to date

**4 Corporate Fraud Activity (Continued)**

4.4 **Whistleblowing/Referrals**

Files closed/being investigated since the last Audit Committee are as follows:

<b>File Ref</b>	<b>Description</b>	<b>Status</b>
17/18 17-96	Council Tax Exemption	Passed to Finance for adjudication.
18/19 18-149	Single Person Discount	Passed to Finance for adjudication.
19/20 19-75	Potential Irregularity in Accounting Practices – Community Facility	Report finalised and issued to management. Summary findings included at Section 6 of this report.
19/20 19-94	Employee Fraud – Annual Leave	Closed – no fraud detected.
19/20 19-104	Employee Fraud – Flexi Leave	Referred to Service.
19/20 19-118	External Fraud – Payroll	Ongoing investigation.

4.5 In addition, the status of other enquiries received between 29/7/19 and 27/9/19 is as follows:

<b>Blue Badge Enquiries</b>					
<b>Number of Enquiries</b>	<b>Misuse Identified</b>		<b>No misuse</b>	<b>Ongoing</b>	
19	16		2	1	
<b>Council Tax Referrals (Whistleblower/Services)</b>					
<b>Number of Enquiries</b>	<b>Fraud Established</b>	<b>No Fraud</b>	<b>Referred to Finance</b>	<b>Referred to External Agency</b>	<b>Ongoing</b>
6	1	2	1	0	2

**5 Ad hoc activities undertaken since the previous Audit Committee**

5.1 From time to time, management will request the assistance of Internal Audit in certain activities that are in addition to the annual Operational Plan. Examples of such activities include investigations of alleged irregularities, review of changes in system procedures etc.

5.2 Contingency has been made available in the Operational Plan for such ad hoc activities. Since the previous Audit Committee, ad hoc activity undertaken in the period is as follows:

- Providing relevant information in relation to FOI requests.
- Providing risk management training to HSCP management.

**INVERCLYDE COUNCIL INTERNAL AUDIT**  
**REPORT TO AUDIT COMMITTEE ON**  
**STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)**  
**AT 30 SEPTEMBER 2019**

**Summary: Section 1 Summary of Management Actions due for completion by 30/09/19**

There were no actions due for completion by 30 September.

**Section 2 Summary of Current Management Actions Plans at 30/09/19**

At 30 September 2019 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

**Section 3 Current Management Actions at 30/09/19**

At 30 September 2019 there was a total of 7 current audit action points.

**Section 4 Analysis of Missed Deadlines**

At 30 September 2019 there was one audit action point where the agreed deadline had been missed.

**Section 5 Summary of Action Plan Points by Audit Year**

**INVERCLYDE COUNCIL INTERNAL AUDIT  
 REPORT TO AUDIT COMMITTEE ON  
 STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
 SUMMARY OF MANAGEMENT ACTION PLANS DUE FOR COMPLETION BY 30.09.19**

**SECTION 2**

<b>Directorate</b>	<b>No. of Actions Due</b>	<b>No. of Actions Completed</b>	<b>Deadline missed Revised date set*</b>	<b>Deadline missed Revised date to be set*</b>
Environment, Regeneration & Resources	0	0		
Health and Social Care Partnership (HSCP)	0	0		
Education, Communities and Organisational Development	0	0		
<b>Total</b>	<b>0</b>	<b>0</b>		

\* These actions are included in the Analysis of Missed Deadlines – Section 4



**INVERCLYDE COUNCIL INTERNAL AUDIT  
 REPORT TO AUDIT COMMITTEE ON  
 STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
 SUMMARY OF CURRENT MANAGEMENT ACTION PLANS AS AT 30.09.19**

**SECTION 2**

**CURRENT ACTIONS BY DIRECTORATE**

<b>Environment, Regeneration and Resources</b>	
Due for completion January 2020	1
<b>Total Actions</b>	<b>1</b>
<b>HSCP</b>	
Due for completion November 2019	2
Due for completion December 2019	1
Due for completion November 2020	1
<b>Total Actions</b>	<b>4</b>
<b>Education, Communities and Organisational Development</b>	
Due for completion October 2019	2
<b>Total Actions</b>	<b>2</b>
<b>Total current actions:</b>	<b>7</b>

**INVERCLYDE COUNCIL INTERNAL AUDIT  
REPORT TO AUDIT COMMITTEE ON  
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
CURRENT MANAGEMENT ACTIONS AS AT 30.09.19**

**SECTION 3**

**Environment, Regeneration and Resources**

Action	Owner	Expected Date
<b>Waste Management (September 2019)</b>		
<p><b>Adequacy of Contract Monitoring Procedures (Amber)</b> Management will ensure that:</p> <ul style="list-style-type: none"> <li>• the central spreadsheet is updated with new contract details and communicated to staff;</li> <li>• as part of the invoice authorisation process, a check of the contract price is carried out to ensure accuracy of the calculated income;</li> <li>• arrangements are put in place to recover the income owed to Inverclyde Council due to the incorrect pricing structure being applied in error; and</li> <li>• formal contractual agreements will be put in place regarding hard plastics and gully and street sweeping.</li> </ul>	<b>Team Leader Environmental Services</b>	<b>31.01.20</b>

**HSCP**

Action	Owner	Expected Date
<b>Stock and Inventory Control (March 2019)</b>		
<p><b>Adequacy of Stock Controls within Inverclyde Centre for Independent Living (Amber)</b> Funding has been secured to procure a new stock control system which will be used for ICIL equipment. As an interim measure, managers have carried out a manual stock check and a year-end stock check will be carried out by end of March.</p>	<b>Service Manager (Innovation and ICIL)</b>	<b>31.12.19</b>
<b>HSCP Contract Management (July 2019)</b>		
<p><b>Adequacy of Contract Management Framework documentation (Amber)</b> Management will finalise the draft guidance on the management of underperforming HSCP service providers. In turn, the final guidance will be:</p> <ul style="list-style-type: none"> <li>• submitted to the Health &amp; Social Care Committee for approval;</li> <li>• included within the next update of the Contract Management Framework; and</li> <li>• communicated to all relevant officers.</li> </ul>	<b>Service Manager (Quality and Development)</b>	<b>30.11.19</b>

\* See Analysis of Missed Deadlines – Section 4

**INVERCLYDE COUNCIL INTERNAL AUDIT  
REPORT TO AUDIT COMMITTEE ON  
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
CURRENT MANAGEMENT ACTIONS AS AT 30.09.19**

**SECTION 3**

**HSCP (Continued)**

Action	Owner	Expected Date
<b>HSCP Contract Management (July 2019)</b>		
The finalised guidance will be formally reviewed for its effectiveness within a year of its being applied in practice.	<b>Service Manager (Quality and Development)</b>	<b>30.11.20</b>
Management will review the monitoring indicators contained within the Contract Management Framework.	<b>Service Manager (Quality and Development)</b>	<b>30.11.19</b>

**Education, Communities and Organisational Development**

Action	Owner	Expected Date
<b>Education CSA (December 2018)</b>		
<b>Managing GDPR and Information Governance (Amber)</b> Management will develop and implement an Education wide action plan which appropriately manages GDPR and information governance requirements along with trying to minimise variances in local practice between Education establishments.	<b>Head of Culture, Communities and Educational Resources</b>	<b>31.10.19</b>
Management will address specific issues regarding the implementation of GDPR.	<b>Head of Culture, Communities and Educational Resources</b>	<b>31.10.19*</b>

\* See Analysis of Missed Deadlines – Section 4

**INVERCLYDE COUNCIL INTERNAL AUDIT  
REPORT TO AUDIT COMMITTEE ON  
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
ANALYSIS OF MISSED DEADLINES**

**SECTION 4**

Report	Action	Original Date	Revised Date	Management Comments
<b>Education CSA (December 2018)</b>	<b>Managing GDPR and Information Governance (Amber)</b> Management will address specific issues regarding the implementation of GDPR.	<b>30.04.19</b>	<b>31.10.19</b>	<p>A number of actions have been implemented however work is ongoing to:</p> <ul style="list-style-type: none"> <li>• formalise the sharing of data between Education Services and the Inverclyde HSCP;</li> <li>• provide staff with guidance on when consent is required before information is shared with other Services or agencies along with specifying how best to record consent;</li> <li>• develop an Education data sharing template for use with all relevant external organisations</li> <li>• develop guidance on GDPR and information governance which is written from the perspective of staff who work within Education Services and this guidance will aim to address key issues.</li> </ul> <p>Assistance is required from the Information Governance team to finalise these issues.</p>

**INVERCLYDE COUNCIL INTERNAL AUDIT  
REPORT TO AUDIT COMMITTEE ON  
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)  
SUMMARY OF ACTION PLAN POINTS BY AUDIT YEAR**

**SECTION 5**

The following table sets out the total number of agreed actions raised by audit year together with their completion status as at 30 September 2019.

<b>Audit Year</b>	<b>Total Agreed Actions</b>	<b>Total Actions Completed</b>	<b>Total Current Actions Not Yet Due*</b>		
			<b>Red</b>	<b>Amber</b>	<b>Green</b>
2013/2014	116	116	0	0	0
2014/2015	77	77	0	0	0
2015/2016	52	52	0	0	0
2016/2017	66	66	0	0	0
2017/2018	53	47	0	0	6
2018/2019	45	21	0	3	21
2019/2020	7	0	0	4	3
<b>Total</b>	<b>416</b>	<b>379</b>	<b>0</b>	<b>7</b>	<b>30</b>

\*This part of the table sets out the total number of current actions not yet due at the date of the follow up report. The AMBER actions are included in Section 3 of the follow up report.