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Report To:	Audit Committee	**Date:**	**8 January 2013**
Report By:	**Corporate Director Environment, Regeneration & Resources**	**Report No:**	**AC/54/13/AF/APr**
Contact Officer:	**Andi Priestman**	**Contact No:**	**01475 712251**
Subject:	**Internal Audit Progress Report – 24 September to 30 November 2012**		

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 24 September to 30 November is attached as an Appendix to this report since its content is essential to the understanding of the Council's control environment. **Appendix 1**

2.0 SUMMARY

2.1 Two internal audit reports have been finalised since the last Audit Committee meeting:

- Supply Teachers; and
- Control Self-Assessment CHCP.

2.2 This report contains a total of 9 issues, categorised as follows:

Red	Amber	Green
0	4	5

2.3 The 2012/13 audit plan is progressing well and the current status of the plan is as follows:

Stage	Number of Reports
Final Report	4
Draft Report	0
Fieldwork Complete	0
Fieldwork in Progress	5
Planning	0
Not started	2
Total	11

3.0 RECOMMENDATIONS

3.1 It is recommended that Members agree to note the progress made by Internal Audit in the period from 24 September to 30 November 2012.

Aubrey Fawcett
Corporate Director Environment, Regeneration & Resources

4.0 BACKGROUND

4.1 None.

5.0 IMPLICATIONS

5.1 Legal: Relevant action plans will bring processes in line with regulatory and legislative requirements where applicable.
Finance: There are no financial implications arising from this report.
Personnel: There are no personnel implications arising from this report.
Equalities: There are no equalities issues arising from this report.

6.0 CONSULTATIONS

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

7.0 LIST OF BACKGROUND PAPERS

7.1 File of completed internal audit reports: By Andi Priestman, Chief Internal Auditor.

Inverclyde council

Audit Committee Report
Report on Internal Audit Activity from
24 September to 30 November 2012

Section	**Contents**	**Page**

1   Audit work undertaken in the period

Reports issued since last update

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

Red	• In our opinion the control environment is insufficient to address the risk and this could impact the Council as a whole. • Corrective action must be taken and should start immediately. • Overseen to completion by Corporate Management Team.
Amber	• 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. • Corrective action must be taken (some exceptions may be agreed with IA) within reasonable timeframe. • Overseen to completion by Head of Service.
Green	• 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. • Process improvements/efficiencies may be actioned at management discretion in consultation with Internal Audit (IA). • Managed by service owner.

1.2   One report has been finalised since the October 2012 Audit Committee, which is identified below, together with a summary of the gradings of the recommendations made to management. In Section 2 we have provided a summary of the main findings from the review.

	Grading			
Reports finalised since previous Audit Committee	**Red**	**Amber**	**Green**	**Total Number of Issues**
2012/2013 plan				
Supply Teachers	0	3	1	**4**
CSA – CHCP	0	1	4	**5**
Total	**0**	**4**	**5**	**9**

Other activities

Risk Management

1.4   Risk Management is the subject of separate reporting to Audit Committee and a full report is submitted separately.

1.5   **Internal Audit Action Plan Follow Up**

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 24 September 2012.

Supply Teachers

2.2   The Council's schools require temporary teachers to provide cover when permanent teachers are absent. These absences can be categorised as being either planned or unplanned. Unplanned absences are associated with sick leave and planned absences arise due to staff training. Education employee costs are dominated by the costs of teachers, which includes supply teachers. The 2012/13 budget for daily rate teachers is £2.2m.

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 Supply Teachers.

2.4   The overall control environment opinion for this audit review was **Satisfactory**. The review identified three AMBER issues as follows:

Ensuring quality of cover when organising supply teachers

Consistency of learning is maximised when the usual class (or subject) teacher is available, however when permanent teachers are unavailable there is some disruption for pupils. It is important but difficult to minimise the number of supply teachers which pupils face during the school year. Key control procedures which assist in managing supply teachers include:-

- managing teachers performance - Head Teachers manage those permanent teachers whose performance does not meet established quality thresholds such as adequately controlling classes;
- succession planning – supply teacher numbers can be minimised through managing those teachers who retire or take maternity leave; and
- teachers' on-going training and professional development – although schools plan training events, HR is responsible for providing cover. The timing of teachers training events must be co-ordinated with HR in order to assist with the provision of supply cover.

However, through discussions with staff we have identified some weaknesses in the management of these procedures as follows:-
- managing teachers performance – as supply cover is short term in nature it is difficult for Head Teachers to manage supply teachers performance. We understand that the practicalities of applying existing HR procedures to underperforming supply teachers have not been fully examined. Although the numbers of such teachers may be very small their impact on pupils' education cannot be discounted;

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

- succession planning - we understand that there is insufficient clarity between Head Teachers and HR around the process for managing staff changes which arise during the school year. We appreciate the need to reconcile the legal and contractual entitlements of teachers with the benefits of minimising supply cover; and
- teachers' on-going training and professional development - we found that there is scope to review how training and supply cover is co-ordinated across all schools over time. This includes the need to minimise the cancellation of staff training events.

In addition, there is an unresolved issue regarding the fair deployment of supply teachers whilst minimising the number of separate supply teachers which a class encounters. Supply teachers are generally deployed on a "first come, first served" basis. Although this is effective for shorter term absences it can lead to changes in cover when a teacher's absence extends into a second or third week.

Risks associated with these findings include:-

- quality of learning can be reduced whenever underperforming supply teachers are not managed effectively and within reasonable timeframes;
- in the absence of effective succession planning there could be unintended use of supply teachers;
- staff training events are more likely to be disrupted when their timing does not adequately allow for the availability of supply teacher cover at different times during the school year; and
- the consistency and quality of learning delivered to pupils may be disrupted whenever any given class of pupils face a succession of supply teachers.

Initiating supply cover for teachers who are on sick leave

Head Teachers and HR staff aim to ensure that supply teachers arrive on time and where required. Meeting those objectives requires an efficient and effective deployment process and the removal of any unavoidable delays in communication between Head Teachers and HR. However, through discussions with staff we have identified some unresolved delays in the organisation of supply cover, namely;

- the need for all teachers, whenever possible, to inform Head Teachers early enough of their initial absence e.g. no later than 8.15am on the day of absence;
- the availability of school office staff to take calls from absent teachers from 8am, especially if the Head Teacher is unavailable; and
- specifying the role of voicemail when teachers inform schools of their initial absence before 8am and over weekends or holidays.

We acknowledge that managing absence notifications is inherently difficult due to its unplanned nature and urgency along with the need to treat absent staff reasonably whilst ensuring the efficient organisation of supply cover.

It is more difficult to organise the timely deployment of supply teachers whenever there are unnecessary delays in notifying HR.

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

Management information for organising supply teacher placements

It is important that Head Teachers, Education management and senior HR staff all have access to relevant, accurate and timely information regarding supply teacher placements. We understand that although the newly introduced supply teacher module on "SEEMIS" (Education Management Information System) already produces operational information for HR staff e.g. supply teacher availability and subject coverage, HR management has not yet fully determined the information requirements of the main stakeholders or the capability of "SEEMIS" to produce such information accurately and regularly.

In addition, a temporary Education/HR working group met during early Summer 2012 to introduce the "SEEMIS" supply teacher module. However, at present there is no formal, regular feedback mechanism between key stakeholders, including review of available management information. We understand that informal feedback is being received by HR staff and HR plan to review the impact of the new process in October.

Without relevant, accurate and timely management information it is more difficult to achieve objectives, improve service delivery and minimise the risks associated with supply teacher placements.

2.5 The review identified a total of 4 issues, three of which we consider to be individually significant, and an action plan is in place to address all issues by 30 April 2013.

Control Self-Assessment – CHCP

2.6 Control Self-Assessment is a process through which the adequacy and effectiveness of internal controls are examined, with the goal of providing assurance that key objectives are being met. The process allows Service Managers and Assistant Service Managers to participate in the assessment of internal controls and develop action plans to address any weaknesses identified. In turn these action plans assist in the evaluation of risks which, if not properly addressed can undermine the achievement of these key objectives. Finally, the Control Self-Assessment process can increase awareness of internal control issues and motivate staff to carefully design and implement suitable control processes.

2.7 The objective of this audit was to provide Senior Management and the Audit Committee with an assessment of the adequacy and effectiveness within the CHCP, of the governance, risk management and controls of key strategic risks.

2.8 The overall control environment opinion for this audit review was **Satisfactory**. The review identified one AMBER issue as follows:

Petty Cash – Completion of Bank Reconciliations

A key control over ensuring that petty cash transactions are completely and accurately recorded is the regular reconciliation of the petty cash book to the bank statements on a monthly basis and that reconciling items should be investigated and resolved in a timely manner. Through findings from Control Self-Assessment responses and discussions with staff we have identified some issues regarding the accuracy of the completion of reconciliations, their timely submission to Finance and staff training requirements to complete and check them.

In the absence of complete, accurate and timely petty cash bank reconciliations it is more difficult to identify operational problems, such as postings not made to the cash book and to validate the balance in the bank account.

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

2.9   The review identified a total of 5 issues, one of which we consider to be individually significant, and an action plan is in place to address all issues by 31 May 2013.

3.   **Audit Plan for 2012/13 – Progress to 30 November 2013**

Planned Audit Cover	Planning	TOR Issued	Fieldwork in Progress	Fieldwork Complete	Draft Report	Report Finalised	Reported to Audit Committee
Risk-Based Reviews							
Business Continuity Management							
Performance Management	√	√	√				
Software Licensing	√	√	√				
Supply Teacher Management	√	√	√	√	√	√	January 2013
Licensing							
Limited Scope Financial System Reviews							
Cash Collection	√	√	√				
Insurance	√	√	√	√	√	√	October 12
Arms Length Organisation Reviews							
Inverclyde Leisure Trust – Control Risk Self-Assessment							
Compliance Reviews							
Carbon Management Plan	√	√	√				
Performance Reviews							
Statutory Performance Indicators	√	√	√	√	√	√	August 12
CSA Education	√	√	√				
CSA CHCP	√	√	√	√	√	√	January 2013
Corporate Governance							
SSIFC 2011/12	Input provided by CIA.						
Projects/Key Change Initiatives							
Information Governance and Management	Input provided by CIA.						

4   Ad hoc activities undertaken since the previous Audit Committee

4.1   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.

4.2   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 input to FOI requests as appropriate.

INVERCLYDE COUNCIL INTERNAL AUDIT

**REPORT TO AUDIT COMMITTEE ON
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)
AT 31 OCTOBER 2012**

Summary: **Section 1**   **Summary of Management Actions due for completion by 31/10/12**

There were 6 items due for completion by 31 October 2012, 5 of which have been reported as completed by management and action in relation to one item has been revised.

In addition, one action with a completion date of 31 December 2012 has been completed ahead of the agreed deadline.

Section 2   **Summary of Current Management Actions Plans at 31/10/12**

At 31 October 2012 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

Section 3   **Current Management Actions at 31/10/12**

At 31 October 2012 there was a total of 22 current audit action points.

Section 4   **Analysis of Missed Deadlines**

At 31 October 2012 there was a total of 14 of the 22 audit action points 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 31.03.12

SECTION 2

Directorate	No. of Actions Due	No. of Actions Completed	Deadline missed Revised date set*	Deadline missed Revised date to be set*
Environment, Regeneration & Resources	5	4	1	
Community Health & Care Partnership (CHCP)				
Education, Communities and Organisational Development	1	1		
Total	**6**	**5**	**1**	

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

In addition, the following action has been reported as completed by management ahead of the agreed deadline:

Action	Owner	Expected Date
Customer Services Review (April 2012)		
Customer Service Strategy (Amber) Customer Service Strategy which incorporates CIVICA findings, workstream savings and Corporate Management restructure will be finalised.	**Revenues and Customer Services Manager**	**31.12.12**

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 31.10.12

SECTION 2

CURRENT ACTIONS BY DIRECTORATE

Environment, Regeneration and Resources	
Due for completion November 2012	1
Due for completion February 2013	1
Due for completion March 2013	3
Due for completion April 2013	1
Total Actions	**6**
Community Health and Care Partnership	
Due for completion December 2012	9
Completion Date to be advised	1
Total Actions	**10**
Education, Communities and Organisational Development	
Due for completion November 2012	1
Due for completion March 2013	3
Due for completion April 2013	2
Total Actions	**6**
Total current actions:	**22**

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 31.10.12

SECTION 3

Environment, Regeneration and Resources

Action	Owner	Expected Date
Customer Services Review (April 2012)		
Quality assurance over incoming telephone calls (Amber) Specify, scope and cost purchase and maintenance costs for voice recorder software for all CSC activity and potential expansion. No budget provision available, bid will require to be made for appropriate funding.	**Revenues and Customer Services Manager**	**01.04.13**
Information for managing the staff/customer interface (Amber) CSC & Corporate Communications Manager to formalise & document procedure for CC keeping CSC updated of any events/relevant information. (Process to be included for Services advising CSC within SLA).	**Revenues and Customer Services Manager**	**31.03.13***
Customer Service Strategy (Amber) Complete SLA with services below; ➤ Education ➤ Licensing / Legal ➤ Procurement ➤ Human Resources ➤ Corporate Communication ➤ Roads / Transport / Waste Collection ➤ Environmental / Streetscene / Registrars ➤ Safer Communities / Pest Control ➤ Revenues ➤ Benefits	**Revenues and Customer Services Manager**	**31.03.13**
Adequacy of Training Needs Analysis (Amber) As part of the appraisal process, a personal development plan will be documented for each member of staff. This will take cognisance of the requirements of the Customer Services Operational Plan and future Welfare Reform impacts.	**Revenues and Customer Services Manager**	**31.03.13**

* 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 31.10.12

SECTION 3

Environment, Regeneration and Resources (Continued)

Action	Owner	Expected Date
Limited Scope Finance Review – Debtors (May 2012)		
Managing Credit Balances (Amber) A full review of the credit balances held on debtors' accounts will be undertaken and a revised procedure for managing credit balances will be written and implemented.	**Principal Accountant (Exchequer)**	**30.11.12**
Insurance (August 2012)		
Compliance with Record Retention Periods (Amber) The electronic records held in the insurance database will be reviewed in terms of the policy for the retention and disposal of insurance documents, to ensure compliance with retention periods for both electronic and paper records. The capabilities of Figtree will be investigated to determine the requirement to hold paper copy insurance files.	**Principal Accountant (Exchequer)**	**28.02.13**

Community Health & Care Partnership

Action	Owner	Expected Date
Homelessness (January 2010)		
Writing-off irrecoverable rent arrears (Amber) Management will review current arrears position and consider write off. Management will consider processes and procedures for monitoring bad debts and introduce a system for write offs which will include: (a) Submitting cases to Chief Financial Officer for write off approval in order to comply with Council Financial Regulations (b) Seeking advice from the Social Work Accountant on how to create ongoing bad debt provision to fund write offs (c) maintaining adequate records of all write off activity	**Service Manager (Homelessness)**	**31.01.13***
Protecting client information from loss or damage (Amber) Management will discuss the following actions with ICT, consider full integration with SWIFT and obtain best practice advice from ICT Services regarding the business continuity issues surrounding the database, including the feasibility of moving the system to be centrally managed by ICT;	**Service Manager/AFO (Homelessness)**	**To be advised***

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 31.10.12

SECTION 3

Community Health & Care Partnership

Action	Owner	Expected Date
Information Governance and Management (May 2009)		
Organisation (Red) Information Governance and Management will form part of the corporate training programme for employees new to the Council or when employees are trained in new systems by other colleagues.	**Corporate Director CHCP**	**31.12.12***
Consideration will be given to establishing a clear desk policy for all staff with access to the Council's information.	**Corporate Director CHCP**	**31.12.12***
People (Red) Security awareness will be promoted using awareness materials such as brochures, posters or web based documents and through structured education/training programmes or computer based training. Training will be made compulsory for all staff to create security positive behaviour.	**Corporate Director CHCP**	**31.12.12***
Information governance and management responsibilities will be specified in job descriptions, or in terms and conditions of employment, including a non-disclosure/ confidentiality clause.	**Corporate Director CHCP**	**31.12.12***
People (Red) External third parties who need access to the council's information and systems will be required to sign non-disclosure/confidentiality agreements.	**Corporate Director CHCP**	**31.12.12***
Process (Amber) Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include: • Developing and implementing a data/information classification system • Identifying owners for critical information and systems • Ensuring important papers and removable storage media are protected against theft or copying, such as by locking them away, restricting access and via a clear desk policy • Investing in secure archiving facilities for appropriate hard copy records that must be retained in accordance with relevant legislation.	**Corporate Director CHCP**	**31.12.12***

* 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 31.10.12

SECTION 3

Community Health & Care Partnership (Continued)

Action	Owner	Expected Date
Information Governance and Management (May 2009)		
Technology (Amber) Standards and guidance will be prepared to: • Support remote working and ensure workers do not compromise the security of any facilities to which they can be connected. • Ensure that access privileges are revoked immediately when authorised users leave the organisation • Advise staff what to do in the event of a security breach. • Ensure that for new system implementations, an information governance review will form part of the testing and go-live sign off.	**Corporate Director CHCP**	**31.12.12***
Consideration will be given to establishing a dedicated information security function which has council-wide responsibility for promoting and co-ordinating information security across the council, developing information security policies/guidelines, providing expert advice, investigating major information security incidents and conducting security awareness programmes.	**Corporate Director CHCP**	**31.12.12***

Education, Communities and Organisational Development

Action	Owner	Expected Date
Travel and Subsistence (June 2010)		
The anomaly in the mileage rates where teachers are paid a higher rate will be further investigated and a common approach adopted which uses the Inland Revenue rate of 45p per mile to ensure that all employees are treated fairly and equitably.	**HR Manager (Organisational Development)**	**31.03.13***

* 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 31.10.12

SECTION 3

Education, Communities and Organisational Development (Continued)

Action	Owner	Expected Date
Corporate Complaints (June 2010)		
Recording of Complaints (Amber) Management will consider the development of Intelligent eForms as a corporate solution to capturing customer contact in a consistent manner with drop down facility to select type of contact e.g. request for service, complaint, compliment or comment. Management will develop and implement a corporate process for recording of complaints including complainant name, nature/type of complaint, description, timescale for responses, actual response dates, stages of complaint etc. These procedures will then be developed for rolling out to services.	**Corporate Comms Manager**	**31.03.13***
Reporting of Complaints (Amber) Procedures will be developed, documented and implemented for reporting of complaints to P&R committee. This will include the total number of complaints received, the stage of complaints received and the percentage of complaints responded to within agreed timescales.	**Corporate Comms Manager**	**31.03.13***
Supply Teachers (October 2012)		
Ensuring Quality of Cover when organising supply teachers (Amber) Education management, in consultation with HR and Head Teachers, will examine the practical issues around; • applying existing HR procedures to underperforming supply teachers. This will include the means whereby Head Teachers raise concerns and how best to evidence those concerns in ways which can be used by HR officers; • fully applying succession planning to teaching staff during the school year. Education management will aim to minimise the use of supply cover due to teachers who retire or take maternity leave by timing their replacement with permanent or temporary teachers, as appropriate; • how supply teacher capacity can be increased to meet a reasonable level of underlying demand for emergency supply cover whilst at the same time covering core CPD events; and • determining those times of year when CPD events will be avoided or timetabled centrally due to known shortages in the availability of supply teachers.	**Head of Education**	**30.04.13**

* See Analysis of Missed Deadlines – Section 4

SECTION 3

Education, Communities and Organisational Development (Continued)

Action	Owner	Expected Date
Organising supply cover for teachers who are off sick (Amber) Education management, in consultation with HR, will; • advise all teachers of the preferred timescale for notifying schools when they require to take sick leave; and • examine the arrangements for Head or Depute Head Teachers to take calls from absent teachers earlier, if possible, along with specifying the role of voicemail. Any new arrangements will allow for managers roles in applying the Council's absence management policy and procedures. The role of school office staff in taking calls will be carefully and closely supervised by Head Teachers or staff nominated by them.	**Head of Education**	**30.04.13**
Management information for supply teacher placements (Amber) HR will develop appropriate information to manage supply teacher placements.	**HR Manager (OD)**	**30.11.12**

* 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
Homelessness (January 2010)	**Protecting client information from loss or damage (Amber)** Management will discuss the following actions with ICT, consider full integration with SWIFT and obtain best practice advice from ICT Services regarding the business continuity issues surrounding the database, including the feasibility of moving the system to be centrally managed by ICT.	**31.03.10** **30.06.10** **31.12.10** **31.05.11** **30.09.11** **31.03.12**	**To be advised**	ICT has recently started work on these issues in conjunction with AVD Ltd. Co-ordination with both management and the company will be required along with the technical aspects of the database being on a separate server whilst ensuring the "front end" processes for users remain.
Information Governance and Management (May 2009)	**People (Red)** External third parties who need access to the council's information and systems will be required to sign non-disclosure/confidentiality agreements.	**30.04.10**	**31.12.12**	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting upon the current action plan to ensure appropriate resources are in place.
Information Governance and Management (May 2009)	**Organisation (Red)** Information Governance and Management will form part of the corporate training programme for employees new to the Council or when employees are trained in new systems by other colleagues.	**30.04.10**	**31.12.12**	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting upon the current action plan to ensure appropriate resources are in place.
Information Governance and Management (May 2009)	**People (Red)** Information Governance and management responsibilities will be specified in job descriptions, or within terms and conditions of employment. This will include a non-disclosure/confidentiality clause.	**30.06.10**	**31.12.12**	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting upon the current action plan to ensure appropriate resources are in place.

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
Information Governance and Management (May 2009)	**Organisation (Red)** Consideration will be given to establishing a clear desk policy for all staff with access to the Council's information.	31.08.10	31.12.12	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting upon the current action plan to ensure appropriate resources are in place.
Homelessness (January 2010)	**Writing-off irrecoverable rent arrears (Amber)** Management will review current arrears position and consider write off. Management will consider processes and procedures for monitoring bad debts and introduce a system for write offs.	30.09.10 31.12.10 31.05.11 30.09.11 31.01.12 30.06.12	31.01.13	Discussions are taking place with RSL regarding the use of their system to manage rent arrears for current and former tenants. Relevant action will then be taken.
Travel and Subsistence (June 2010)	**Value for Money – Mileage Claims (Amber)** The anomaly in the mileage rates where teachers are paid a higher rate will be further investigated and a common approach adopted which uses the Inland Revenue rate of 45p per mile to ensure that all employees are treated fairly and equitably.	31.12.10 31.03.11 30.04.11 30.09.11 31.03.12	31.03.13	A report has been presented to and approved by CMT. New policy will be in place by the end of the financial year.
Corporate Complaints (June 2010)	**Reporting of Complaints (Amber)** Procedures will be developed, documented and implemented for reporting of complaints to P&R committee. This will include the total number of complaints received, the stage of complaints received and the percentage of complaints responded to within agreed timescales.	31.01.11 30.04.11 30.06.11 31.07.12	31.03.13	A corporate complaints policy has been drafted based on SPSO guidance which has been approved by CMT. Timescales for complaints handling will be built into LAGAN system and staff will be trained on new system, processes and timescales. It is anticipated that the policy will be launched by 31 March 2013.

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
Corporate Complaints (June 2010)	**Recording of Complaints (Amber)** Management will develop and implement Intelligent eForms as a corporate solution to capturing customer contact in a consistent manner with drop down facility to select type of contact e.g. request for service, complaint, compliment or comment. Management will develop and implement a corporate process for recording of complaints including complainant name, nature/type of complaint, description, timescale for responses, actual response dates, stages of complaint etc. These procedures will then be developed for rolling out to services.	**31.01.11** **30.04.11** **30.06.11** **31.07.12**	**31.03.13**	A corporate complaints policy has been drafted based on SPSO guidance which has been approved by CMT. Timescales for complaints handling will be built into LAGAN system and staff will be trained on new system, processes and timescales. It is anticipated that the policy will be launched by 31 March 2013.
Information Governance and Management (May 2009)	**People (Red)** Security awareness will be promoted using materials such as brochures, posters or web based documents and through structured education/training programmes and computer based training. Training will be compulsory for all staff to create security positive behaviour.	**31.03.11**	**31.12.12**	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting on the current action plan to ensure appropriate resources are in place.

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
Information Governance and Management (May 2009)	**Process (Amber)** Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include: • Developing and implementing a data/information classification system • Identifying owners for critical information and systems • Ensuring important papers and removable storage media (e.g. CDs) are protected against theft or copying, such as by locking them away and restricting access and via a clear desk policy • Investing in secure archiving facilities for appropriate hard copy records that must be retained in accordance with relevant legislation.	31.03.11	31.12.12	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting on the current action plan to ensure appropriate resources are in place.
Information Governance and Management (May 2009)	**Technology (Amber)** Standards and guidance will be prepared to: • Support remote working and ensure workers do not compromise the security of any facilities to which they can be connected. • Ensure that access privileges are revoked immediately when authorised users leave the organisation. • Advise staff what to do in the event of a security breach. • Ensure that for new system implementations, an information governance review will form part of the testing and go-live sign off.	31.03.11 31.03.12	31.12.12	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting on the current action plan to ensure appropriate resources are in place.

INVERCLYDE COUNCIL INTERNAL AUDIT
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SECTION 4

Report	Action	Original Date	Revised Date	Management Comments
Information Governance and Management (May 2009)	**Technology (Amber)** Consideration will be given to establishing a dedicated information security function which has council-wide responsibility for promoting and co-ordinating information security across the council, developing information security policies/guidelines, providing expert advice, investigating major information security incidents and conducting security awareness programmes.	31.03.12	31.12.12	Regular reporting is undertaken to CMT on action plan progress with relevant updates to P&R Committee. The structure of the working group is currently being reviewed in light of changes in legislation impacting on the current action plan to ensure appropriate resources are in place.
Customer Services (April 2012)	**Information for Managing the Staff/Customer Interface** CSC & Corporate Communications Manager to formalise & document procedure in relation to CC keeping CSC updated of any events/relevant information. (Process to be included for Services advising CSC within SLA).	31.10.12	31.03.13	New Corporate Communications Manager in post. SLA for services that are already operational will be in place by March 2013. For new services, an SLA will be developed as part of the take-on process and any corporate communications requirements will be included at that point.

INVERCLYDE COUNCIL INTERNAL AUDIT
REPORT TO CMT 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 31 October 2012.

Audit Year	Total Agreed Actions	Total Actions Completed	Total Current Actions		
			Red	Amber	Green
2006/2007	26	26	0	0	0
2007/2008	174	174	0	0	0
2008/2009	214	207	5	2	0
2009/2010	194	176	0	5	13
2010/2011	118	117	0	0	1
2011/2012	62	49	0	5	8
2012/2013	16	7	0	5	4
Total	**804**	**756**	**5**	**17**	**26**