Inverclyde council

AGENDA ITEM NO: 4

Report To:	**Audit Committee**	**Date:**	**23 April 2013**
Report By:	**Corporate Director Environment, Regeneration & Resources**	**Report No:**	**AC/61/13/AF/APr**
Contact Officer:	**Andi Priestman**	**Contact No:**	**01475 712251**
Subject:	**Internal Audit Progress Report – 4 February to 27 March 2013**		

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 4 February to 27 March 2013 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:-

- Performance Management; and
- Cash Collection.

2.2 These report contains a total of 10 issues, categorised as follows:

Red	Amber	Green
0	2	8

2.3 The fieldwork for the 2012/13 audit plan is now complete and the current status of the plan is as follows:

Stage	Number of Reports
Final Report	7
Draft Report	2
Fieldwork Complete	2
Fieldwork in Progress	0
Planning	0
Not started	0
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 4 February to 27 March 2013.

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.

APPENDIX 1

Inverclyde council

Audit Committee Report
Report on Internal Audit Activity from
4 February to 27 March 2013

INVERCLYDE COUNCIL – REPORT ON INTERNAL AUDIT ACTIVITY FROM 4 FEBRUARY TO 27 MARCH 2013

APPENDIX 1

Section	Contents	Page
1	Audit work undertaken in the period	
2	Summary of main findings from reports issued since previous Audit Committee	
3	Audit Plan for 2012-2013– progress to 27 March 2013	
4	Ad hoc activities undertaken since the previous Audit Committee	

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 Two reports has been finalised since the February 2013 Audit Committee, which is 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 review.

	Grading			
Reports finalised since previous Audit Committee	**Red**	**Amber**	**Green**	**Total Number of Issues**
2012/2013 plan				
Performance Management	0	1	3	**4**
Cash Collection	0	1	5	**6**
Total	**0**	**2**	**8**	**10**

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 1 February 2013.

Performance Management

2.2 At its simplest the Council has a number of objectives and deploys its resources in order to achieve those objectives. Objectives can be expressed in terms of outcomes (or impacts) and are measured in both monetary and non-monetary ways. Resources are essentially staff time and money. However, these resources are becoming increasingly limited due to competing priorities and a sluggish economy. Achieving objectives must be directly linked to the allocation of resources across the Council and improving the delivery of services. A successful performance management framework can contribute to linking resources to objectives along with demonstrating the delivery of nationally and locally set outcomes.

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 Performance Management.

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

<u>Managerial capacity and training for implementing performance management</u>

The managers responsible for implementing performance management must have sufficient time to understand and fully apply the process in practice. Although the Corporate Policy Team appreciates the importance of managerial capacity we have identified some issues which require further examination:-

- the pace of corporate change continues to grow whilst the number of managers continues to fall. We understand more work is being pushed down to less senior staff which increases the risk of over-delegating;
- deciding the best means of avoiding improvement action plans which “over-promise” but under-deliver when financial resources are declining and the time pressures on managers are increasing;
- determining how to sensitively but adequately manage the weaknesses which may slowly emerge from implementing the performance management framework;
- specifying the role of Corporate Management Team and elected members in overseeing the performance management framework in practice, including the need to undertake a “challenge” role over the output and action plans flowing from the process.

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

A key way of successfully implementing the performance management framework involves training managers. Relevant staff have received performance management presentations and written guidance from the Corporate Policy Team. However, managers need to combine their professional expertise with generic management skills such as decision making, delegation and overseeing change. The Corporate Policy Team anticipates that on-going support for managers will help to implement and embed the new framework. In addition, HR have introduced a number of initiatives such as performance appraisal and Leadership Development which indirectly support performance management. We understand that HR is currently reviewing the Workforce & Development Strategy and this exercise will include specifying which training courses are mandatory for managers. However, the specific training needs of managers implementing the new framework have not yet been fully assessed.

Underlying risks include:-

- managers who over-delegate due to operational service pressures may find it more difficult to successfully implement performance management;
- there is a risk of criticism by external inspectors and therefore of reputational damage whenever overly ambitious action plans fail to deliver promised improvements;
- any failures in managing weaknesses which emerge from implementing performance management may compromise delivery of the Council's strategic objectives;
- the performance management process may not gain from the CMT's collective knowledge and experience if their oversight and "challenge" roles are not adequately specified, with this same risk also applying to elected members; and
- managers who do not fully understand and implement the performance management framework are less likely to produce robust and worthwhile improvement actions.

2.5 The review identified a total of 4 issues, one of which we consider to be individually significant, and an action plan is in place to address all issues by 31 March 2014.

2.6 **Cash Collection**

2.7 The Customer Service Centre offers a single point of contact for people wanting to access a wide range of Council services. It is responsible for offering payment facilities to customers who wish to call in person at the Council office or make a payment via the telephone. It aims to deliver an effective, efficient and timely service.

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 over the key risks faced by Inverclyde Council in relation to Cash Collection.

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

<u>Security at the Customer Service Centre</u>

In relation to physical security, there are a number of CCTV cameras covering the cash desks in the Customer Service Centre (CSC). However, through observation and enquiry it was identified that the camera images do not fully cover all the cash desks till and pedestal drawers. In addition, although access to the CSC via the lift area is controlled via security card there is no restriction on the cards meaning that all staff including visitors can access the CSC and some areas could be easily accessible to the public. Also, when the Security Contractor's staff are uplifting bank lodgements their identity is not verified on each visit.

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

Where CCTV cameras do not adequately cover cash desks, or images are not retained for the specified period, there is a risk that money could be misappropriated. In addition, if robust physical security measures are not in operation, there is a risk that unauthorised access may be gained to the CSC. Furthermore, where adequate checks are not undertaken to verify the identity of security contractor staff, there is a risk that banking lodgements are given to unauthorised persons.

2.10 The review identified a total of 6 issues, one of which we consider to be individually significant, and an action plan is in place to address all issues by 31 July 2013.

3. Audit Plan for 2012/13 – Progress to 1 February 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	√	√	√	√	√	√	March 2013
Software Licensing	√	√	√	√	√	√	February 2013
Supply Teacher Management	√	√	√	√	√	√	January 2013
Licensing	√	√	√	√	√		
Limited Scope Financial System Reviews							
Cash Collection	√	√	√	√	√	√	March 2013
Insurance	√	√	√	√	√	√	October 2012
Arms Length Organisation Reviews							
Inverclyde Leisure Trust – Corporate Governance Review (SSIFC)	Input provided by CIA.						
Compliance Reviews							
Carbon Management Plan	√	√	√	√			
Performance Reviews							
Statutory Performance Indicators	√	√	√	√	√	√	August 2012
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 relevant input to information governance working group.

Appendix 2

INVERCLYDE COUNCIL INTERNAL AUDIT

REPORT TO AUDIT COMMITTEE ON
STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)
AT 28 FEBRUARY 2013

Summary:

Section 1 Summary of Management Actions due for completion by 28/02/13

There were 2 items due for completion by 28 February 2013, 1 of which has been reported as completed by management and action in relation to 1 item has been revised.

Section 2 Summary of Current Management Actions Plans at 28/02/13

At 28 February 2013 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

Section 3 Current Management Actions at 28/02/13

At 28 February 2013 there was a total of 35 current audit action points.

Section 4 Analysis of Missed Deadlines

At 28 February 2013 there was a total of 13 of the 35 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 28.02.13

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	2	1	1	
Community Health & Care Partnership (CHCP)				
Education, Communities and Organisational Development				
Total	**2**	**1**	**1**	

* 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 28.02.13

SECTION 2

CURRENT ACTIONS BY DIRECTORATE

Environment, Regeneration and Resources	
Due for completion March 2013	7
Due for completion April 2013	3
Due for completion May 2013	1
Due for completion June 2013	1
Due for completion September 2013	1
Due for completion December 2013	2
Due for completion June 2014	1
Total Actions	**16**
Community Health and Care Partnership	
Due for completion March 2013	1
Completion Date to be advised	8
Total Actions	**9**
Education, Communities and Organisational Development	
Due for completion March 2013	3
Due for completion April 2013	2
Due for completion December 2013	1
Due for completion March 2014	4
Total Actions	**10**
Total current actions:	**35**

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 28.02.13

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**	**31.12.13**
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**	**31.12.13**
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 28.02.13

SECTION 3

Environment, Regeneration and Resources (Continued)

Action	Owner	Expected Date
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)**	**31.05.13***
Software Licensing (January 2013)		
Completeness and Accuracy of Software Register (Amber) ICT will investigate the procurement of a software asset management package. This application will be used to gather all the detailed information required.	**ICT Support Team Leader**	**31.03.13**
Services will be asked to confirm usage of software and where the licence is held. Relevant action will then be taken to remove unlicensed software. Steps will be taken to capture all software centrally in the configuration management database.	**Service Desk Team Leader**	**30.06.13**
An annual exercise will be done to ensure the register is maintained up to date. However, as a result of the introduction of the Curriculum for Excellence schools are being encouraged to develop their own curriculum using a wide range of systems and applications. This may create issues for software asset management if this responsibility is devolved to schools.	**Transitional Head of ICT**	**30.06.14**
Installation of Unauthorised Software (Amber) Controls will be put into operation to remove the ability for members of staff to install software on the corporate domain.	**ICT Support Team Leader**	**31.03.13**
The reason for the change in the group policy on the education domain will be investigated to determine if the previous standard of security can be reinstated.	**ICT Support Team Leader**	**31.03.13**
Controls on the corporate and education domains will be aligned to the same security standards to prevent employees installing software.	**ICT Support Team Leader**	**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 28.02.13

SECTION 3

Environment, Regeneration and Resources (Continued)

Action	Owner	Expected Date
Absence of Procedural Documentation (Amber) Procedural documentation for software licensing activities will be developed, documented and implemented. This will be supported by a process to evidence periodic reviews on an annual basis, which will include version control.	**Service Desk Team Leader**	**31.03.13**
An ICT "How To" guide will be developed for software installation and removal and published on ICON.	**Service Desk Team Leader**	**31.03.13**
Contact schools in September of each year to ask them to confirm that they have completed AUP forms for all of their pupils.	**Quality Improvement Officer**	**30.09.13**
Cash Collection (March 2013)		
Security at Customer Service Centre (Amber) Contact Property Services about the issues regarding security cameras and access to the premises.	**Revenues and Customer Services Manager**	**30.04.13**
Look at a solution with regard to the desk that is used for cash counting.	**Revenues and Customer Services Manager**	**30.04.13**

* 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 28.02.13

SECTION 3

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)**	**To be advised***
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***
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**	**To be advised***
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**	**To be advised***
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**	**To be advised***

* 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 28.02.13

SECTION 3

Community Health & Care Partnership (Continued)

Action	Owner	Expected Date
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**	**To be advised***
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**	**To be advised***
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. 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**	**To be advised***

* 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 28.02.13

SECTION 3

Community Health & Care Partnership (Continued)

Action	Owner	Expected Date
CSA CHCP (November 2012)		
Petty Cash – Completion of Bank Reconciliations (Amber) Training in the completion and checking of petty cash reconciliations will be made available to members of staff to enable them to prepare and review timely, accurate and complete petty cash bank reconciliations on a monthly basis and submit them to Corporate Finance. Corporate Finance will review completeness of the reconciliations and any issues will be highlighted to the relevant Manager.	**Accountancy Manager CHCP**	**31.03.13**

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***
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***

* 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 28.02.13

SECTION 3

Education, Communities and Organisational Development (Continued)

Action	Owner	Expected Date
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**
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**

* 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 28.02.13

SECTION 3

Education, Communities and Organisational Development (Continued)

Action	Owner	Expected Date
Performance Management (March 2013)		
Managerial capacity and training for implementing performance management (Amber) Develop a series of Planning and Performance Management events.	**Corporate Policy Manager**	**31.03.14**
Carry out training needs analysis at events, in conjunction with HR, within the capacity of a small Corporate Policy Team.	**Corporate Policy Manager**	**31.03.14**
Roll out training on Inverclyde Performs once CDIPs are entered onto it.	**Corporate Policy Manager**	**31.03.14**
Review training on performance management currently available and identify if there are any mandatory elements.	**Corporate Policy Manager**	**31.03.14**
Carry out further work with CMT and Elected Members regarding the roll out of the new information on Inverclyde Performs and their scrutiny role.	**Corporate Policy Manager**	**31.12.13**

* 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)
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**	**To be advised**	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**	**To be advised**	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**	**To be advised**	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
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**	**To be advised**	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**	**To be advised**	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.

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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 • 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**	**To be advised**	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. The draft information classification system is currently being reviewed in light of the new PSN Code of Connection which requires to be implemented by 31 May 2013.
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 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**	**To be advised**	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.

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REPORT TO AUDIT COMMITTEE ON
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SECTION 4

Report	Action	Original Date	Revised Date	Management Comments
Customer Services (April 2012)	**Information for Managing the Staff/Customer Interface (Amber)** 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**	**31.12.13**	New Corporate Communications Manager in post. SLA for services that are already operational will be in place by December 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.
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.	**28.02.13**	**31.05.13**	The Figtree system currently does not have the functionality to delete old sensitive date. Discussions have taken place with the software supplier and the functionality can be developed. The Council is currently negotiating the fee and timescale for the functionality to be developed and implemented.

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 28 February 2013.

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	208	4	2	0
2009/2010	194	176	0	5	13
2010/2011	118	117	0	0	1
2011/2012	62	54	0	4	4
2012/2013	57	18	0	20	19
Total	**845**	**773**	**4**	**31**	**37**