

**Report To:** Audit Committee **Date:** 25 February 2014

**Report By:** Acting Corporate Director Environment, Regeneration & Resources **Report No:** AC/75/14/AP/APr

**Contact Officer:** Andi Priestman **Contact No:** 01475 712251

**Subject:** Internal Audit Progress Report - 2 December 2013 to 31 January 2014

## 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 2 December 2013 to 31 January 2014 is attached as an Appendix to this report since its content is essential to the understanding of the Council's control environment. **Appx 1**

## 2.0 SUMMARY

- 2.1 One internal audit report has been finalised since the last Audit Committee meeting:-
- CSA - Education
- 2.2 This report contains a total of 4 issues categorised as follows:

Red	Amber	Green
0	2	2

- 2.3 The 2013/14 audit plan is well underway and the current status of the plan is as follows:

Stage	Number of Reports
Final Report	6
Draft Report	2
Fieldwork Complete	0
Fieldwork in Progress	5
Planning	0
Not started	1
<b>Total</b>	<b>13</b>

- 2.4 In relation to the review of Homecare, it has been agreed with the Corporate Director ICHCP to defer this review to the 2014/15 plan to allow the new processes around CM2000 to have time to bed in. The review will now be carried out in Q1 of the 2014/15 financial year.
- 2.5 In relation to Internal Audit follow up, 4 items were due for completion by 31 December 2013, of which 3 have been reported as completed, and action in relation to one item has been revised. The current status report is attached at Appendix 2. **Appx 2**

### **3.0 RECOMMENDATIONS**

- 3.1 It is recommended that Members agree to note the progress made by Internal Audit in the period from 2 December 2013 to 31 January 2014.

**Alan Puckrin**

**Acting Corporate Director Environment, Regeneration & Resources**

## 4.0 BACKGROUND

- 4.1 In April 2013, the Audit Committee approved the current Internal Audit Annual Plan which detailed a programme of activity to be undertaken during 2013-14.
- 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 One internal audit report has been finalised since the last Audit Committee meeting in January 2014.
- 5.2 The 2013/14 plan is well underway and the current status of the plan is as follows:

Stage	Number of Reports
Final Report	6
Draft Report	2
Fieldwork Complete	0
Fieldwork in Progress	5
Planning	0
Not started	1
<b>Total</b>	<b>13</b>

- 5.3 The audit review of Homecare has been deferred to the 2014/15 plan to allow the new processes around CM2000 to have time to bed in.
- 5.4 There are 19 current action points being progressed by Officers. Four actions were due for completion by 31 December 2013, of which 3 have been reported as completed and action in relation to one item has been revised.

## 6.0 IMPLICATIONS

### 6.1 Finance

There are no direct financial implications arising from this report.

### 6.2 Legal

There are no direct legal implications arising from this report.

### 6.3 Human Resources

There are no direct HR implications arising from this report.

### 6.4 Equalities

There are no direct equalities implications arising from this report.

## **6.5 Repopulation**

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: By Andi Priestman, Chief Internal Auditor.



**Audit Committee Report  
Report on Internal Audit Activity from  
2 December 2013 to 31 January 2014**

<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 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>

1.2 One report has been finalised since the January 2014 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.

Reports finalised since previous Audit Committee	Grading			Total Number of Issues
	Red	Amber	Green	
<b>2013/2014 plan</b>				
CSA – Education	0	2	2	4
<b>Total</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>4</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 a 6-monthly basis.

**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 29 November 2013.

**CSA - Education**

2.2 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. It allows Heads of Establishments and selected staff to participate in the assessment of internal controls and develop action plans to address any weaknesses that may be identified. In turn these action plans assist in evaluating risks which, if not properly addressed, could undermine the achievement of key objectives. Furthermore, Control Self-Assessments can increase awareness of internal control issues and motivate staff to carefully design and implement control processes.

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 surrounding a number of key risks faced by Education Services.

2.4 The overall control environment opinion for this follow-up review was **Satisfactory**. The review identified 2 AMBER issues as follows:

**Supply Teachers**

Continuity of learning is maximised when the regular class teacher is available. However, when this teacher is absent due to health reasons, participation in service training or management duties, a Supply Teacher can be recruited to avoid disruption to pupils learning.

The Control Self Assessment returns showed that most establishments are fully aware of Inverclyde Council's policy on Supply Teachers. However, the returns highlighted a number of operational issues when implementing the policy as follows:

- Supply cover in a number of cases often is not met, even when applied for in advance.
- Some Heads and Deputies often cancel meetings in order to cover staff absences due to the lack of specialist staff.
- Pupils are being supervised by supply teachers rather than being taught by the relevant specialist.
- Staff training/progress reviews can be postponed due to cover not being available.

The lack of availability of supply cover may often lead to staff being unable to attend meetings or staff training events. In addition, a lack of appropriate supply staff on a sustained basis may disrupt learning and teaching.



**2 Summary of main findings from reports issued since previous Audit Committee (Cont'd)**

**Performance Appraisal Review and Timetable**

It is important that performance Appraisals are completed to show the contribution staff are making to the achievement of the Council's corporate objectives. Corporately, the annual set target for completion of performance appraisals is 75% by 31 March.

However, from a review of CSA returns and through discussions with HR it has been highlighted that:

- Due to the lack of returns received by 31/3/12, an extension was given to Education to complete and return all performance appraisal information for 11/12 year by 31 October 2012.
- No returns were received at all for 2012/13 as a result of the extension given for the 2011/12 returns.
- No returns have been received by HR for 2013/14 as at 20 December 2013 and for some establishments a timetable requires to be developed to ensure performance appraisals are completed on time.

Where there is an absence of performance appraisal reviews, there is a risk that Heads of Establishment may not be aware of current or future staff training needs. In addition, any unaddressed skills gaps can reduce the overall quality of service and may lead to operational difficulties in the event of key staff absences.

- 2.5 The review identified a total of 4 issues, two of which we consider to be individually significant, and an action plan is in place to address all issues by 30 June 2014.

3. Audit Plan for 2013/14 – Progress to 31 January 2014

Planned Audit Cover	Planning	TOR Issued	Fieldwork in Progress	Fieldwork Complete	Draft Report	Report Finalised	Reported to Audit Committee
<b>Risk-Based Reviews</b>							
Homecare	Deferred to 2014/2015 Annual Audit Plan						
Property Maintenance	√	√	√				
Waste Contract Management	√	√	√	√	√		
Trading Standards	√	√	√				
Client Accounts - CHCP	√	√	√				
School Meals	√	√	√				
<b>Limited Scope Financial System Reviews</b>							
Debt Recovery	√	√	√				
Creditors	√	√	√	√	√	√	January 2014
<b>Follow Up Reviews</b>							
Corporate Purchase Cards	√	N/A	√	√	√	√	October 2013
Corporate Complaints	√	N/A	√	√	√	√	January 2014
<b>Performance Reviews</b>							
Statutory Performance Indicators	√	√	√	√	√	√	August 2013
CSA Education	√	√	√	√	√	√	February 2014
CSA CHCP	√	√	√	√	√	√	October 2013
<b>Corporate Governance</b>							
SSIFC 2012/13	Input provided by CIA.						
<b>Projects/Key Change Initiatives</b>							
Information Governance and Management	Input provided by CIA via Information Governance Steering Group.						
Annual Governance Statement/Local Code	Input provided by CIA via AGS working group.						
Solace Indicators	Input provided by CIA via Corporate Performance Improvement Group.						

**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 the information governance working group.
  - Providing relevant input to inform the Council's approach to the Annual Governance Statement/Local Code of Governance.

**INVERCLYDE COUNCIL INTERNAL AUDIT**  
**REPORT TO AUDIT COMMITTEE ON**  
**STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY)**  
**AT 31 DECEMBER 2013**

**Summary: Section 1 Summary of Management Actions due for completion by 31/12/13**

There were 4 items due for completion by 31 December 2013, 3 of which have 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 31/12/13**

At 31 December 2013 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

**Section 3 Current Management Actions at 31/12/13**

At 31 December 2013 there was a total of 19 current audit action points.

**Section 4 Analysis of Missed Deadlines**

At 31 December 2013 there was a total of 6 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 31.12.13**

**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	1	1		
Community Health & Care Partnership (CHCP)	2	1	1	
Education, Communities and Organisational Development	1	1		
<b>Total</b>	<b>4</b>	<b>3</b>	<b>1</b>	

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

In addition, the following actions have been regraded due to significant progress made in addressing the actions:

Action/Agreed Date for Completion	Update
<b>Information Governance and Management (May 2009)</b>	
External third parties who need access to the council's information and systems will be required to sign non-disclosure/confidentiality agreements.  <b>1 April 2014 New Audit Grading - Green</b>	Standard Terms and Conditions of Purchase were updated during 2013. Those terms include robust clauses covering data protection and confidentiality. In addition the Council's Standard ITT also includes a DP Certificate which has also recently been updated.  This will be put on the next DPO Meeting agenda.
<b>People (Red)</b> Information governance and management responsibilities will be specified in job descriptions, or in terms and conditions of employment, including a non-disclosure/confidentiality clause.  <b>1 April 2014 New Audit Grading – Green</b>	Terms and Conditions for employees have recently been updated and standard contracts now have a clause in respect of complying with Council policies and procedures, including the Code of Conduct for Employees. The Code of Conduct for Employees contains sections on: Data Protection; Acceptable Use of Information Systems; Confidentiality of Information; Managing Information.

**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 31.12.13**

**SECTION 2**

<b>Action/Agreed Date for Completion</b>	<b>Update</b>
<b>Information Governance and Management (May 2009)</b>	
<p><b>People (Red)</b>            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.</p> <p><b>1 April 2014</b>  <b>New Audit Grading - Amber</b></p>	<p>The first meeting of the Training, Awareness and Communication Sub-group has taken place and a terms of reference has been agreed. Actions arising from the meeting will be progressed including reviewing the results of the recent Information Governance and management awareness survey to target most relevant areas for training. A number of Data Protection workshops have been facilitated by Legal Services which have been attended by a number of Services across the Council. Further workshops have been organised for the remainder of 2014.</p>

**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 31.12.13**

**SECTION 2**

**CURRENT ACTIONS BY DIRECTORATE**

<b>Environment, Regeneration and Resources</b>	
Due for completion January 2014	3
Due for completion March 2014	1
Due for completion April 2014	1
Due for completion June 2014	1
<b>Total Actions</b>	<b>6</b>
<b>Community Health and Care Partnership</b>	
Due for completion March 2014	1
Due for completion April 2014	3
Due for completion October 2014	1
<b>Total Actions</b>	<b>5</b>
<b>Education, Communities and Organisational Development</b>	
Due for completion March 2014	6
Due for completion April 2014	1
Due for completion September 2014	1
<b>Total Actions</b>	<b>8</b>
<b>Total current actions:</b>	<b>19</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 31.12.13**

**SECTION 3**

**Environment, Regeneration and Resources**

<b>Action</b>	<b>Owner</b>	<b>Expected Date</b>
<b>Customer Services Review (April 2012)</b>		
<b>Customer Service Strategy (Amber)</b> Complete SLA with services below; <ul style="list-style-type: none"> <li>➤ Education</li> <li>➤ Licensing / Legal</li> <li>➤ Procurement</li> <li>➤ Human Resources</li> <li>➤ Corporate Communication</li> <li>➤ Roads / Transport / Waste Collection</li> <li>➤ Environmental / Streetscene / Registrars</li> <li>➤ Safer Communities / Pest Control</li> <li>➤ Revenues</li> <li>➤ Benefits</li> </ul>	<b>Revenues and Customer Services Manager</b>	<b>30.04.14</b>
<b>Insurance (August 2012)</b>		
<b>Compliance with Record Retention Periods (Amber)</b> 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.	<b>Principal Accountant (Exchequer)</b>	<b>31.01.14*</b>
<b>Software Licensing (January 2013)</b>		
<b>Completeness and Accuracy of Software Register (Amber)</b> 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.	<b>Transitional Head of ICT</b>	<b>30.06.14</b>
<b>Corporate Purchase Cards Follow Up Review (August 2013)</b>		
<b>Appropriateness of Authorisation Limits (Amber)</b> The Payments & Control Team will: <ul style="list-style-type: none"> <li>• maintain a list of corporate purchase card holders</li> <li>• validate the list of corporate purchase cardholders annually by contacting relevant Service Managers; and</li> <li>• for each cardholder confirm that their purchase card transaction limit does not exceed their FMS creditors' limit. Purchase card transaction limits which are found to exceed creditor limits will be aligned following discussions between all relevant officers, including Service Managers and Corporate Procurement staff when appropriate.</li> </ul>	<b>Principal Accountant (Exchequer)</b>	<b>31.01.14</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 31.12.13**

**SECTION 3**

**Environment, Regeneration and Resources (Continued)**

<b>Action</b>	<b>Owner</b>	<b>Expected Date</b>
<b>Creditors Review (November 2013)</b>		
<p><b>Authorisation of New Suppliers and Amendments to Existing Suppliers (Amber)</b></p> <ul style="list-style-type: none"> <li>• The Payments and Control Officer will conduct monthly sample checks on creations and amendments to the creditors' masterfile to ensure that they have all been correctly recorded and evidenced in terms of the operating procedure for creations and amendments to the creditors' masterfile. A log will be maintained to evidence this check.</li> <li>• In the absence of a reliable Supplier Audit Report, the Payments and Control Officer will investigate if it is possible to run a report on changes made to specific fields within the creditors' masterfile e.g. bank details. If such a report is available then it will be run each week and the data checked against the documentation held for creations and amendments to the creditors' masterfile.</li> </ul>	<b>Principal Accountant (Exchequer)</b>	<b>31.01.14</b>
<b>Business Continuity Management (May 2013)</b>		
<p><b>ICT Role in Business Continuity Management (Amber)</b> As a joint exercise the Transitional Head of ICT and Civil Contingencies Service will;</p> <ul style="list-style-type: none"> <li>• formalise the ICT Disaster Recovery Plan (DRP). This will include agreeing a timetable for finalising the DRP in order to provide an acceptable minimum standard of BCM preparedness; and</li> <li>• assist the Corporate Management Team (CMT) with determining the restoration order for computer applications. Objective criteria along with ICT technical advice and the BCM framework document will all be used to choose between the relative importance of different computer applications. These criteria will include the need to provide statutory services and protecting the most vulnerable Inverclyde residents.</li> </ul>	<b>Transitional Head of ICT</b>	<b>31.03.14</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 31.12.13**

**SECTION 3**

**Community Health & Care Partnership**

Action	Owner	Expected Date
<b>Homelessness (January 2010)</b>		
<p><b>Writing-off irrecoverable rent arrears (Amber)</b> Management will review current arrears position and consider write off.</p> <p>Management will consider processes and procedures for monitoring bad debts and introduce a system for write offs which will include:</p> <p>(a) Submitting cases to Chief Financial Officer for write off approval in order to comply with Council Financial Regulations</p> <p>(b) Seeking advice from the Social Work Accountant on how to create ongoing bad debt provision to fund write offs</p> <p>(c) maintaining adequate records of all write off activity</p>	<b>Service Manager (Homelessness)</b>	<b>01.04.04*</b>
<b>Information Governance and Management (May 2009)</b>		
<p><b>People (Amber)</b> 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.</p>	<b>Corporate Director CHCP</b>	<b>01.04.14*</b>
<p><b>Process (Amber)</b> Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include:</p> <ul style="list-style-type: none"> <li>• Identifying owners for critical information and systems</li> <li>• Investing in secure archiving facilities for appropriate hard copy records that must be retained in accordance with relevant legislation.</li> </ul>	<b>Corporate Director CHCP</b>	<b>31.10.14*</b>
<b>CSA – CHCP (October 2013)</b>		
<p><b>Managing Cash Payments for Client Project Work (Amber)</b> Management will ensure that:</p> <ul style="list-style-type: none"> <li>• the Head of Administration develops and implements a system to routinely check that procedures are being followed.</li> </ul>	<b>Head of Administration</b>	<b>30.04.14*</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 31.12.13**

**SECTION 3**

**Community Health & Care Partnership (Continued)**

Action	Owner	Expected Date
<b>CSA – CHCP (October 2013)</b>		
<b>Managing Data Protection in Practice (Amber)</b> Management will: <ul style="list-style-type: none"> <li>• remind all staff of the process to be followed if they encounter any difficulties when implementing the Data Protection Act. This guidance will include highlighting the Head of Administration’s lead role regarding data protection matters</li> </ul>	<b>Head of Administration</b>	<b>31.03.14</b>

**Education, Communities and Organisational Development**

Action	Owner	Expected Date
<b>Information Governance and Management (May 2009)</b>		
<b>Organisation (Red)</b> 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.	<b>Corporate Director EC&amp;OD</b>	<b>01.04.14*</b>
<b>Travel and Subsistence (June 2010)</b>		
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.	<b>HR Manager (Organisational Development)</b>	<b>31.03.14*</b>
<b>Performance Management (March 2013)</b>		
<b>Managerial capacity and training for implementing performance management (Amber)</b> Develop a series of Planning and Performance Management events.	<b>Corporate Policy Manager</b>	<b>31.03.14</b>
Carry out training needs analysis at events, in conjunction with HR, within the capacity of a small Corporate Policy Team.	<b>Corporate Policy Manager</b>	<b>31.03.14</b>
Roll out training on Inverclyde Performs once CDIPs are entered onto it.	<b>Corporate Policy Manager</b>	<b>31.03.14</b>
Review training on performance management currently available and identify if there are any mandatory elements.	<b>Corporate Policy Manager</b>	<b>31.03.14</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 31.12.13**

**SECTION 3**

**Education, Communities and Organisational Development (Continued)**

<b>Action</b>	<b>Owner</b>	<b>Expected Date</b>
<b>Control Self-Assessment – Education (April 2013)</b>		
<p><b>Managing Pupil Transport (Amber)</b> Education management will convene a short life working group to fully identify and actively manage the issues involving contract buses. The working group will:</p> <ul style="list-style-type: none"> <li>• examine greater use of Strathclyde Passenger Transport's complaints procedure;</li> <li>• clarify the role of Schools Support Managers and Headquarters staff in managing pupil transport, including the production of appropriate action plans; and</li> <li>• ask Head Teachers to advise the working group of any other unresolved issues associated with contract buses.</li> </ul>	<b>Policy &amp; Commissioning Team Leader</b>	<b>30.09.14</b>
<b>Business Continuity Management (May 2013)</b>		
<p><b>Business Continuity for Education Establishments (Amber)</b> The Head of Education in partnership with the Civil Contingencies Service will develop appropriate business continuity arrangements which collectively cover all of the Council's Education establishments. This exercise will include appropriate input from School Support Managers and a representative group of Head Teachers and Heads of Establishment.</p>	<b>Head of Education</b>	<b>31.03.14</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>Information Governance and Management (May 2009)</b>	<b>Organisation (Red)</b> 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.	<b>30.04.10</b> <b>31.12.12</b>	<b>01.04.14</b>	A progress report was presented to February P&R Committee and an action plan has been approved. A training sub-group has been formed and will take this action forward.
<b>Homelessness (January 2010)</b>	<b>Writing-off irrecoverable rent arrears (Amber)</b> 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.	<b>30.09.10</b> <b>31.12.10</b> <b>31.05.11</b> <b>30.09.11</b> <b>31.01.12</b> <b>30.06.12</b> <b>31.01.13</b> <b>31.10.13</b>	<b>01.04.14</b>	The new rent accounting system will allow for the management of rent arrears and write-offs. ICT and Legal issues now resolved with staff training set for 25/2/14. This will be followed by input of up to 100 house records and amending standard form letter templates. The SLA has a "go live" date of 1/4/14.
<b>Information Governance and Management (May 2009)</b>	<b>People (Amber)</b> 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.	<b>31.03.11</b> <b>31.12.12</b>	<b>01.04.14</b>	The first meeting of the Training, Awareness and Communication Sub-group has taken place and a terms of reference has been agreed. Actions arising from the meeting will be progressed including reviewing the results of the recent Information Governance and management awareness survey to target most relevant areas for training. A number of Data Protection workshops have been facilitated by Legal Services which have been attended by a number of Services across the Council. Further workshops have been organised for the remainder of 2014.

**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>Information Governance and Management (May 2009)</b>	<p><b>Process (Amber)</b> Processes will be developed and implemented to strengthen the system of internal control over information governance and management. This will include:</p> <ul style="list-style-type: none"> <li>• Identifying owners for critical information and systems</li> <li>• Investing in secure archiving facilities for appropriate hard copy records that must be retained in accordance with relevant legislation.</li> </ul>	<p><b>31.03.11</b> <b>31.12.12</b></p>	<b>31.10.14</b>	<p>The information classification system was approved at P&amp;R Committee on 13 August 2013.</p> <p>A progress report was presented to February P&amp;R Committee. A records management sub-group has been formed and will take the remaining actions forward.</p>
<b>Insurance (August 2012)</b>	<p><b>Compliance with Record Retention Periods (Amber)</b> 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.</p> <p>The capabilities of Figtree will be investigated to determine the requirement to hold paper copy insurance files.</p>	<p><b>28.02.13</b> <b>31.05.13</b></p>	<b>31.01.14</b>	<p>The change to the system has been designed but some technical difficulties require to be resolved. In addition, the implications of the consultation on possible changes to civil damages legislation will require to be considered for impact on the proposed change.</p>
<b>CSA – CHCP (October 2013)</b>	<p><b>Managing Cash Payments for Client Project Work (Amber)</b> Management will ensure that:</p> <ul style="list-style-type: none"> <li>• the Head of Administration develops and implements a system to routinely check that procedures are being followed.</li> </ul>	<b>31.12.13</b>	<b>01.04.14</b>	<p>It has been agreed that Business Support Co-ordinators will undertake checks annually. A template requires to be created for BSC use and checks will then be started.</p>

**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 December 2013.

<b>Audit Year</b>	<b>Total Agreed Actions</b>	<b>Total Actions Completed</b>	<b>Total Current Actions</b>		
			<b>Red</b>	<b>Amber</b>	<b>Green</b>
2006/2007	26	26	0	0	0
2007/2008	174	174	0	0	0
2008/2009	214	209	1	2	2
2009/2010	194	190	0	2	2
2010/2011	118	118	0	0	0
2011/2012	62	61	0	1	0
2012/2013	76	56	0	9	11
2013/2014	29	9	0	4	16
<b>Total</b>	<b>893</b>	<b>843</b>	<b>1</b>	<b>18</b>	<b>31</b>