

**High Importance Recommendations – Position at 6<sup>th</sup> November 2023**

<b><u>Audit Title (Owner)</u></b>	<b><u>Summary of Finding(s) and Recommendation(s)</u></b>	<b><u>Management Response</u></b>	<b><u>Action Date (by end of)</u></b>	<b><u>Confirmed Implemented</u></b>
Reported July 2023				
2022-23 CCTV (Head of Standards & Development)	<p>Three High Importance recommendations were raised in this report:</p> <ol style="list-style-type: none"> <li>1. A decision needs to be made on how the standalone CCTV installations can be captured, and how these should be recorded and managed</li> <li>2. Compliance reviews should be undertaken on the standalone CCTV installations.</li> <li>3. Guidance should be developed for Business Risk Owners on the correct processes to follow when procuring a new CCTV system.</li> </ol>	<p><b>A CCTV Working Group has been established and the first meeting was held in October 2023. The CCTV Code of Practice and Best Practice Guide for Standalone sites has been updated and circulated. IT procurement have been included into the working group and are working on a new procurement process for ad-hoc CCTV systems.</b></p> <p><b>Work is progressing on the recommendations.</b></p>	Dec 23 Extend to Jan 24	
Reported March 2023				
(2021-22) Bed & Breakfast Emergency Placement (Head of Service - Housing )	<p>One high importance recommendation was made.</p> <p>Findings: Audit testing identified a number of service charges for booking hotels and breakfast charges, which were considered to be incorrectly charged as per the contract.</p> <p>Recommendation: Advice should be sought from Legal Services to establish exactly what charges the Council should be legitimately paying as per the contract. Following this advice, any charges that are considered to be overcharges should be promptly recovered.</p>	<p><b>Management have confirmed that they are actively monitoring payments.</b></p> <p><b>Audit testing has confirmed invoices are being checked to ensure that the charges are in line with the contract and where appropriate management are pursuing any overcharges, where overpayments have been identified.</b></p>	Dec 22 Mar 23 Aug 23 Extend to Sept 23	<b>Yes</b>

Reported November 2022				
<b>(2021-22) Direct Payments (Head of Locality East/SRCT and Care Navigators)</b>	<p>The audit highlighted weakness in the annual review process. One high importance recommendation was made:</p> <p>Annual reviews of the support plans should be undertaken to establish whether the needs of the person on Direct Payments had changed, and the Direct Payments remained appropriate.</p>	<p><b>Testing the risk matrix for overdue reviews, especially for those who are waiting more than 24+ months and living on their own, has just started . The DP reviews do not have priority over the overall reviews. Those who are in receipt of Direct Payments in Mental Health, Learning Disability and Locality West, each Head of Service is responsible for prioritising the overdue reviews by using the risk matrix. Eight Social Care Practitioners have been appointed as additional staff to focus on the overdue reviews in each service area (2 additional staff per area). Whilst the Head of Locality East/SCRT is the DP lead, he is not responsible for the reviews across the Department as each service areas have to deal with this with their own priorities/risks.</b></p>	<p>Jan 2023 Jun 2023 Dec 2023 <b>Extend to Jan 2024</b></p>	

Reported Sept 2022				
Key ICT Controls (2020-21) (Head of IT Operations)	<p>The audit identified a number of weaknesses, three high importance recommendations were made in the report:</p> <ol style="list-style-type: none"> <li>1. Adequate Disaster Recovery (DR) governance arrangements should be established.</li> <li>2. A High-level Disaster Recovery Test Strategy should be developed with lower-level assessments being undertaken for individual DR tests as they are planned.</li> <li>3. Resiliency testing of the network and key applications should be planned and undertaken as soon as possible</li> </ol>	<p><b>The Council's ICT partner is currently on site assisting with the build of the DR Cluster. ICT expect to have that completed in November as previously agreed. Once complete they will be undertaking a controlled test, This is expected to be sometime during December 2023.</b></p>	<p>Dec 2022 April 2023 Nov 23 <b>Extend to Jan 24</b></p>	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. Yes</li> <li>3. No</li> </ol>
Reported June 2020				
GDPR (Data Protection Officer – DPO)	<p>Within the earlier audit (Nov 18) it was confirmed that although Information Asset Registers (IAR) had been completed by relevant sections, gaps had yet to be identified – this could potentially lead to Data/Information breaches as gaps in compliance are not identified.</p> <p>Two High Importance recommendations were made, one of which was cleared at the last Committee update. The remaining HI is as follows:</p> <p>Meetings with Information Asset Owners should be undertaken as a matter of urgency to identify possible gaps in meeting Data Protection Act requirements. These gaps should then form sectional action plans which the relevant section should be monitored against.</p>	<p><b>The Data Protection and Digital Information Bill is still with the parliamentary system and is due to go to the Lords. The Data Protection Officer confirmed that they do not expect anything on this now until at least December in Parliament, and latest comments from civil servants indicates it will not become an Act until Summer 2024 as opposed to Spring 2024. (If there's no election before then).</b></p> <p><b>The new Act will still require a Record of Processing Activity (ROPAs)/ Information Asset Registers to be maintained for all high risk processing activities. It has therefore been</b></p>	<p>Jan 21 June 21 Sept 21 Dec 21 Jan 22 Apr 22 Nov 22 July 23 Sept 23 Extend to Dec 23</p>	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. Yes</li> </ol>

		<p><b>confirmed that the Information Governance Team will continue to maintain all ROPAS for high risk processing activities as a minimum and this will be through engagement with relevant Information Asset Owners.</b></p> <p><b>Examples of completed ROPAs for high risk areas such as Children's and Adults Social Care was obtained by Internal Audit</b></p>		
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

Audit/A&RC/231122/Appendix 1 HI Progress Report  
Last Revised 6<sup>th</sup> November 2023