High Importance Recommendations – Position at 5th September 2023

<u>Audit Title (Owner)</u>	Summary of Finding(s) and Recommendation(s)	Management Response	Action Date (by end of)	<u>Confirmed</u> Implemented
Reported July 2023 (2022-23) CCTV Head of Standards & Development	 Three High Importance recommendations were raised in this report: 1. A decision needs to be made on how the standalone CCTV installations can be captured. 	A working group is currently being formalised comprising of managers and data owners across the council. The group will take an oversight of	Dec 23	
Denosto d Manah	 and how these should be recorded and managed Compliance reviews should be undertaken on the standalone CCTV installations. Guidance should be developed for Business Risk Owners on the correct processes to follow when procuring a new CCTV system. 	the summary and recommendations made in the Internal Audit report and report back to the committee once complete.		
Reported March 2023				
(2022-23) Construction Projects (CDM Compliance) Corporate Health & Safety Manager	Finding: Some arrangements exist for the review of project compliance with CDM requirements; however, there isn't a central team/resource in place to provide overall, independent oversight in accordance with a formal strategy and central listing of all capital projects. Recommendation: An appropriate and experienced officer should review the existing arrangements for CDM compliance and ensure that clear, aligned approach for the on-going assessment of CDM compliance across the Council is documented in a CDM compliance strategy. This strategy should be referenced to a suite of supporting procedures as well as a central database that	During June 2023 a register of 'live' notifiable projects was populated, and Management Information (MI) reporting has subsequently been included in the agenda for review at the September 2023 meeting of the City, Development and Neighbourhood's DMT. On an on- going basis, MI reporting will continue to be submitted to the CDN DMT to ensure senior management oversight of the revised governance	Jun 2023 Aug 2023	Yes

(2021-22) Bed & Breakfast Emergency Placement (Head of Service - Housing)	 identifies all capital projects, identifying compliance requirements and details of evidenced assessment. Once approved, it should be ensured that the CDM compliance strategy is appropriately communicated. One high importance recommendation was made. 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. 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. 	structure that is now in place for CDM compliance. Internal Audit have started their testing to confirm implementation of the recommendation; however some delays in obtaining information to complete this work has been encountered due the holiday period. Further update will be provided at the next Committee.	Dec 22 Mar 23 Aug 23 Extend to Sept 23	
Reported November 2022				
(2021-22) Direct Payments <u>(</u> Head of Locality East and SRCT)	The audit highlighted weakness in the annual review process. One high importance recommendation was made: 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.	We have an overdue review project started now to address the outstanding reviews across the service areas where people who require reviews/reassessments will be prioritised based on the oldest ones. We also utilise the risk assessment and prioritisation matrix. The recruitment is still a challenge across the Department and the ongoing adverts are not attracting enough candidates to fill the temporary and permanent positions.	Jan 2023 Jun 2023 Extend to Dec 2023	

		Internal testing is planned in October to review the risk based approach that management have adopted.		
Reported Sept 2022				
Key ICT Controls (2020-21) (Head of IT Operations)	 The audit identified a number of weaknesses, three high importance recommendations were made in the report: 1. Adequate Disaster Recovery (DR) governance arrangements should be established. 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. 3. Resiliency testing of the network and key applications should be planned and undertaken as soon as possible 	3. Resiliency testing has been planned to be completed in November.	Dec 2022 April 2023 Extend to Nov 23	1. Yes 2. Yes 3. No
Reported June 2020				
GDPR (Data Protection Officer – DPO)	 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. Two High Importance recommendations were made, one of which was cleared at the last Committee update. The remaining HI is as follows: Meetings with Information Asset Owners should be undertaken as a matter of urgency to identify possible gaps in meeting Data Protection Act requirements. These 	The Data Protection and Digital Information Bill has passed the 2 nd reading and committee stage in the House of Commons and is at the report stage, before going for a 3 rd reading and then to the House of Lords. Current proposals include the deletion of the need for Records of Processing Activities under GDPR Article 30, to be replaced with the requirement of a lighter touch record (Article 30A) only for processing that poses a high risk to data subjects. Once the Bill has become law, the Data Protection	Jan 21 June 21 Sept 21 Dec 21 Jan 22 Apr 22 Nov 22 July 23 Sept 23 Extend to Dec 23	1. Yes 2. No

gaps should then form sectional action plans which the relevant section should be monitored against.	Officer proposes to review the Council's existing ROPA documents and revise it to meet the new requirements. No update yet from Parliament.	
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Audit/A&RC/230927/Appendix 1 HI Progress Report Last Revised 5th September 2023