

Progress on outstanding Priority 1 actions

Appendix B

Auditable Area Name	Recommendation/Agreed Action	Management Comment	Target Date	Revised target date
<p>PCI compliance Final report issued 20/12/19</p>	<p>An approve charter for the PCI DSS compliance programme should be put in place by management to include a communication structure that ensures executive / senior management are accountable for and aware of any compliance impacting risks on an ongoing basis. This should also include sets of metrics that summarises the performance of implemented security controls and compliance programme that can be reported to Senior Management monthly.</p>	<p>Adelante has replaced Civica ICON. Adelante is PCI compliant to level1, this is attested by Barclaycard and Adelante as a host. The PRISM scan for the LBM network was due to complete in late October, PRISM are tied up with LBMIT. The target date for the Adelante SCAN is November/December 2021</p> <p>Updated comments February 2022 We are trying to resolve this, as there are on-going issues (revised target date moved)</p>	<p>31/05/20</p>	<p>31/05/22</p>
<p>PCI compliance</p>	<p>Management should review the findings within the report produced by Prism Infosec and instigate a remediation project immediately. Following that, a second security review should be undertaken to assess the effectiveness of any controls that have been implemented.</p>	<p>Comments as above</p>	<p>31/05/20</p>	<p>31/05/22</p>
<p>PCI compliance</p>	<p>Quarterly PCI scanning should be conducted by an Approved Scanning Vendor (ASV) to ensure that internal and external vulnerabilities are timely identified, and remedial actions are timely taken.</p>	<p>Comments as above</p>	<p>31/05/20</p>	<p>31/05/22</p>
<p>Building Control Final report issued 5/8/20</p>	<p>A full review of the processes and procedures relating to the BC52: Request for inspection fee form should be undertaken in order to ensure that this is effective and robust. The possibility of running a report from M3 of all BC52 forms printed, and all outstanding</p>	<p>Without a qualified Operation Manager, the Building and Development Control Manager has extremely limited time available to undertake this task given other statutory responsibilities, especially in Development Control.</p>	<p>01/03/21</p>	<p>31/10/22</p>

	<p>fees held in M3 should be investigated in order to aid the reconciliation of income. A full system reconciliation should be established and undertaken regularly to ensure that the BC52 requests for inspection fees have been recorded correctly on M3, submitted to finance for payment and payment subsequently received on E5.</p>	<p>Updated comments received February 2022 I can confirm that none of the actions have been completed and will not be by 31st March either. We are intending to undertake a complete review of Building Control which will include all of these necessary actions. However, we anticipate that this will not commence until the end of April and will take approximately 6 months.</p>		
Building Control	<p>As instructed in the Charges Regulations, the financial statements should be completed and signed by the Section 151 officer within 6 months of the end of the financial year.</p>	<p>In conjunction with finance, we are looking at how this needs to be implemented. Older records are being sought to ensure the process is complied with. Updated comments received February 2022 (as above).</p>	01/01/21	31/10/22
Building Control	<p>The building control surveyor should not be the same officer involved in agreeing the invoices, undertaking site inspections, reviewing the applications for approval, updating the M3 system and issuing the completion certificate. The lack of separation of duties in the work undertaken by building control surveyors should be reviewed and an appropriate separation in approval processes or a peer review process introduced.</p>	<p>There are no Principle Senior Surveyors and no Operations Manager. The B @ DC Manager does not have capacity to evaluate all such cases. We are just finishing a LABC review and are expecting the report within the next month and with matters moving forward quickly in relation to the required competencies in building control following Grenfell, the target dates have been supplied in line with the expected outcome of that review. Updated comments received February 2022 (as above).</p>	01/06/21	31/10/22
Pre Paid Cards Final Report issued 8/2/21	<p>A review of employees with access to the PFS systems must be undertaken as soon as possible. A reconciliation must be carried out between system access and employee records to identify all individuals no longer employed by the Council. The accounts of employees identified as not</p>	<p>Liaison with PFS to identify all users and to include details from Adult Social Care to action the reconciliation of the users accounts. Deactivation of users that should no longer have access has been completed. The 'Policy' is to include details regarding removal of users from the account when they are no longer employed by Children's Social Care or no longer</p>	31/03/21	31/3/22

	<p>working for LBM must have their access and account immediately deactivated. Any employees also identified as being a card holder must have their card cancelled immediately and any remaining funds transferred from the card to the relevant team budget. Going forward a process must be put in place to ensure that employees leaving the Council have their access and accounts deactivated immediately on leaving LBM. The controls around access and account deactivation must form part of the Prepaid Card Policy document.</p>	<p>working for Merton Council. Details in regard to control for access and account deactivation will be included in the policy. Updated comments February 2022 -We have allocated an officer to review the outstanding actions as a matter of urgency and will provide an update by the end of March. (revised target date).</p>		
Pre Paid Cards	<p>An overarching Prepaid Card Policy stipulating the use and management of the card must be drawn up taking into account (and making reference to) other corporate financial policies where appropriate. The policy document must detail the administrative function of the prepaid card .i.e. the purpose of the prepaid card, the prepaid card limitations/parameters, the process for authorising new prepaid cards as well as the lines of responsibilities (to include titles of officers). In addition, the current localised guidance documents must be reviewed with a view to having one divisional prepaid card guidance document, detailing the day-to-day processing and procedures (the PFS manual should be used as a template). On completion, both documents must be made available to all teams using prepaid cards as a means of disbursing funds either to clients or as a means of petty cash.</p>	<p>Agreed. Updated comments-see above</p>	31/03/21	31/3/22

	<p>To ensure that this is appropriate version control in place the two documents must be annotated with the following details Date it was approved: Whom it was approved by: Date of the review: Date of next review:.</p>			
PrePaid Cards	<p>To ensure that there is an adequate separation of duties, a single officer must not be able order, register and upload funds on to a prepaid card.</p>	<p>An exercise is underway working with PFS to identify access levels for each user – details will be included within the Policy as to whom is responsible for each activity in regard to the use of the cards and funding requests for the prepaid cards.</p> <p>Updated comments-see above</p>	31/03/21	31/3/22
DBS Final report issued 28/5/21	<p>The Service Level Agreement in place since May 2016 should be reviewed in order to ensure that the DBS service provided to LB Merton is accurately reflected in the agreement. Where discrepancies are found, the agreement should be varied in accordance with the terms. A process must be put in place to ensure management information, as stipulated in the shared service agreement, is provided.</p>	<p>This is a Kingston response as the provider of the DBS Service: • Kingston to report quarterly on the number of DBS checks carried out by the team (update- now complete). • HR to provide a report on the number of Schools signing up to the service – annually (update – complete). • Kingston to seek customer satisfaction levels and report – annually (Update- Survey to take place during March/April to assess customer satisfaction). • HR to provide number of new providers (Schools) signed up to the service – annually. Training to be provided (Update comment – end of March). • If the outcome of the report on the future of the service is to remain with Kingston, then the charging model will be reviewed. (Update</p>	31/08/21	30/04/22

		comment- report to CMT in September on service provided).		
CM2000 Home Care Monitoring Final report issued 16/6/21	Legal Services should be contacted as soon as possible, with a view to correcting the error identified in the contract documentation.	Agreed and will be completed as part of work to ensure contracts are signed and sealed. Updated comments received February 2022. Advice has been requested from Legal Services -implementation date extended.	31/10/21	31/3/22
CM2000 Home Care Monitoring	The LBM guidance on sealing contracts advises that for services relating to vulnerable adults, consideration should be given to having a deed, even if the value of the contract is lower than £250,000. Legal services should be contacted for advice regarding the signing and sealing of the contracts.	Agreed Updated comments received February 2022 Advice has been requested from Legal Services. Implementation date extended.	31/10/21	31/3/22
CM2000 Home Care Monitoring	Whilst it is acknowledged that the use of CM may not be financially viable for all domiciliary care providers a review of current providers not using CM should be carried out as soon as possible. The review should consider the viability of each provider being required to use CM to record and monitor the care provided for LBM clients. Where the use of CM is found to be viable, the use of the system should be introduced as soon as possible.	Agreed and in progress. C&H DMT have agreed the methodology for identifying which providers CM should be rolled out to and a project plan is in place. Updated comments received February 2022 To be completed as part of the migration to the new version of finance manager – implementation date extended.	31/12/21	31/3/22
CM2000 Home Care Monitoring	Whilst it is acknowledged that there may be occasions when a care worker may not be able to use an opted in clients landline phone, the contract states: - “All and part-manually entered visit duration on opted-in customers will be subject to a 5% recharge of the total cost of those visits submitted.”	Partially agreed, as we need to balance our approach to invoking the 5% recharge with our wider market sustainability responsibilities, particularly in the context of the Pandemic. As part of the work to implement the new version of Finance Manager, and to roll out the CM solution to a wider group of Lot 4 & 5 providers we will document a clear set of business rules relating to	31/12/21	31/3/22

	<p>To ensure compliance with the contract, the penalties for noncompliance as stated in the contract should be invoked. The possibility of the authority achieving significant savings in the event of contract compliance should also be considered.</p>	<p>the recharge and the steps to be taken prior to invoking this requirement.</p> <p>Updated comments received February 2022</p> <p>To be completed as part of the migration to the new version of finance manager – implementation date extended.</p>		
<p>Merton Abbey School final report 26/11/21</p>	<p>The school must produce and have approved by Governors a 3 Year Budget, Recovery Plan and a 1 Year Budget Cash Flow to supplement the currently 1 year deficit budget being submitted for 2021/22.</p>	<p>This has always been the practice. However, this year we are still awaiting indicative 3 year budget figures from LBM, these are normally issued end of March. Despite enquiries regarding 3 year budget figures and a date for a deficit budget meeting to discuss the 1 year proposed deficit, 3 year figure have not been forthcoming and we have not yet been invited to meet to discuss the deficit/ recovery plan. Consequently, the school has not submitted a 3 year budget, or a recovery plan. Note neither of these has been requested, or chased up, by the LA. Our budget and cash flow are very closely monitored in line with an internal recovery plan. The proposed in year deficit is forecast to reduce.</p> <p>Updated comments- February 2022. Headteacher confirmed that the School Finance Team had not yet provided the 3-year projected income figures as agreed.</p>	<p>15/12/21</p>	<p>31/3/22</p>