

## Update on all outstanding Priority 1 audit actions

## Appendix B

### 1 Building Control (final report issued 5/8/20)

Agreed Action	Management Response-	Target date
A full system reconciliation should be established and undertaken regularly to ensure that the requests for inspection fees have been recorded correctly on M3, submitted to finance for payment and payment subsequently received on E5.	A Review of Building Control started in July 2022. This will be looking at a wide range of issues and will include the financial issues outlined. Whilst the review may conclude by the end of this year, it will then take some time for actual processes and recruitment to be put in place	31/3/23
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.	A Review of Building Control started in July 2022. This will be looking at a wide range of issues and will include the financial issues outlined. Whilst the review may conclude by the end of this year, it will then take some time for actual processes and recruitment to be put in place	31/3/23

### 2 PCI compliance (final report issued 20/12/19)

Agreed Actions	Management Response	Target date
An approve charter for the PCI DSS compliance programme should be put in place by management to include a communication structure that ensures senior managements 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.	2/11/22 comments. This is an ongoing task which is the finance team's responsibility but is very much dependant on other areas, and the relationship with Adelante. Details have been sent to the PCI DSS Audit company, Prism Infosec who are reviewing and will feedback, and finance will meet again for progress. At present there is no set date for completion, but this will be provided within the next 2 weeks	31/12/22
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.	See comments above	31/12/22

<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>See comments above.</p>	<p>31/12/22</p>
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3 **CM2000 Home Care Monitoring (final report 16/6/21)**

Agreed Action	Management Response	Target date
<p>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.</p>	<p>Comments on final report: Legal Services have been contacted and we are waiting for a response. 2/11/22 updated comments: This matter is still with legal services.</p>	<p>30/11/22</p>

4 **Transport Fleet Management Final report 20/12/21 (Substantial assurance – 1 P1 outstanding)**

Agreed Actions	Management Response	Target date
<p>LBM does not currently have a formal Fleet Management Strategy. A formal Fleet Management Strategy should be developed to identify LBM's fleet requirements both currently and in the future. Once a formal strategy has been developed, management should monitor performance in delivering the actions contained within the strategy, and against agreed performance management standards</p>	<p>This is a key work stream in 2022/23. The new department restructure was undertaken in the fourth quarter of 2021/22 following which the service has a dedicated full-time manager overseeing the creation and formal approval of a new Fleet Management Strategy. This is due to be implemented by October 2022. 2/11/22 updated comments 'For your information the restructure and appointment of a new Transport Manager has been placed on hold subject to the new Corporate Executive restructure. Following this the new Executive Directors will agree and implement their individual structures. At this stage it is unclear exactly where Passenger Transport will sit within the new directorates'</p>	<p>31/3/23</p>

5 **Parking Enforcement (Final Report 9/2/22)**

Agreed Actions	Management Response	Target date
<p>A review of the contracts of employment should be carried out to confirm the terms and conditions for off contract work to ensure consistency of approach.</p> <p>The process regarding the payment of breaks for all staff working on the tennis tournament should then be reviewed.</p>	<p>This will be reviewed and completed by December 2022, in the light of the arrangements made for the 2022. Any changes to previous working arrangements will be clearly communicated to all effected staff.</p> <p>b) All officers were paid for breaks during the 2022 Championships. This will be reviewed by December 2022 in respect of future.</p>	<p>31/12/22</p>
<p>Detailed procedures should be prepared to include the method of allocating overtime to staff, and the process involved. This process should ensure that there is more than one officer involved with sufficient oversight and authorisation from management.</p> <p>All staff should be required to complete an overtime claims form confirming the actual hours they have worked. The form should be signed and dated by the officer making the claim, as well as the authorising officer. A copy of the document should be retained on file for future reference. The process should ensure that supporting documentation is held electronically in an accessible folder and that the documentation is sufficient to provide a complete audit trail and enable a reconciliation of the additional hours worked to the hours claimed on iTrent</p>	<p>A revised procedure for allocating overtime will be drafted in the light of lessons learned during 2022 setting out a clear and approved process for allocating overtime.</p> <p>HR advice will be sought to ensure the allocation process adheres to all council processes and is open and transparent. The document will set out the agreed process for claiming overtime via an online solution which will also provide a documented Audit trail.</p> <p>All documents will be stored in the SharePoint system or be held in a secure database.</p>	<p>31/12/22</p>
<p>The roles and responsibilities for the additional hours required should be reviewed and clearly defined.</p>	<p>Previous working practices will be reviewed to ensure a balanced and effective service delivery.</p> <p>The review will identify all operational requirements, including:</p> <ul style="list-style-type: none"> <li>• On Street Patrols,</li> <li>• Day/Evening Team Leader support.</li> <li>• Parking Enforcement Manager oversight.</li> <li>• Evening cover.</li> <li>• Silver control by Team Leaders and the Parking Enforcement Manager</li> <li>• Contingency in the absence of the Parking Enforcement Manager and other key personnel.</li> <li>• Responsibilities for escalation</li> </ul>	<p>31/12/22</p>

	<p>A Service Level Agreement was agreed with AELTEC in advance of the 2022 Championships and payment for both the 2021 and 2022 Championships has now been received. The SLA will be reviewed by both parties in advance of the 2023 Championships.</p>	
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**6 Children’s Placement Commissioning- (Final report 19/5/22)**

<b>Agreed Actions</b>	<b>Management Response</b>	<b>Target date</b>
<p>A review of all providers that are not part of the London Commissioning Alliance SLA should be undertaken to ensure that contracts are established.                      In line with Contract Standing Order the Resource Commissioning Team Manager must ensure that all contracts (including extensions) are signed by both the Councils representative and the service provider, at the time the agreement is entered into.                      Once contracts have been established, a protocol to establish the monitoring of the contract should also be agreed</p>	<p>7/10/2022 updated comments:                      The contract for off framework providers is now sitting with the Director of Children Services. we are awaiting her sign off before this can be sent out. Once signed, we will issue contracts to the semi-independent providers. We can then send the contracts to residentials and Independent Fostering Agencies (IFA). The vast majority of the off spend are with the semi-independent providers so we are seeking to complete this first and then move onto the IFAs and residential</p>	<p>30/11/22</p>