

# West Oxfordshire District Council

## Report of Internal Audit Activity

September 2021

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At the conclusion of audit assignment work each review is awarded a “Control Assurance Definition”;

- **No**
- **Limited**
- **Reasonable**
- **Substantial**



#### Audit Framework Definitions

#### Control Assurance Definitions

<b>No</b>	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.
<b>Limited</b>	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
<b>Reasonable</b>	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
<b>Substantial</b>	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

**Non-Opinion** – In addition to our opinion based work we will provide consultancy services. The “advice” offered by Internal Audit in its consultancy role may include risk analysis and evaluation, developing potential solutions to problems and providing controls assurance. Consultancy services from Internal Audit offer management the added benefit of being delivered by people with a good understanding of the overall risk, control and governance concerns and priorities of the organisation.

Recommendations are prioritised from 1 to 3 on how important they are to the service/area audited. These are not necessarily how important they are to the organisation at a corporate level.

Each audit covers key risks. For each audit a risk assessment is undertaken whereby with management risks for the review are assessed at the Corporate inherent level (the risk of exposure with no controls in place) and then once the audit is complete the Auditors assessment of the risk exposure at Corporate level after the control environment has been tested. All assessments are made against the risk appetite agreed by the SWAP Management Board.



Audit Framework Definitions

Categorisation of Recommendations

When making recommendations to Management it is important that they know how important the recommendation is to their service. There should be a clear distinction between how we evaluate the risks identified for the service but scored at a corporate level and the priority assigned to the recommendation. No timeframes have been applied to each Priority as implementation will depend on several factors; however, the definitions imply the importance.

	Categorisation of Recommendations
Priority 1	Findings that are fundamental to the integrity of the service’s business processes and require the immediate attention of management.
Priority 2	Important findings that need to be resolved by management
Priority 3	Finding that requires attention.

Definitions of Risk

Risk	Reporting Implications
High	Issues that we consider need to be brought to the attention of both senior management and the Audit Committee.
Medium	Issues which should be addressed by management in their areas of responsibility.
Low	Issues of a minor nature or best practice where some improvement can be made.

# Audit Plan Progress

# APPENDIX B

Audit Type	Audit Area	Status	Opinion	No of Rec	Priority			Comments
					1	2	3	
					2020/21 Audits in Draft / In Progress at Annual Opinion			
Operational	Authority's Response to Covid-19	Final Report	Medium Substantial	0				See Appendix C
Key Financial Control	Accounts Payable	Final Report	High Reasonable	3		1	2	See Appendix C
Key Financial Control	Payroll	Final Report	High Reasonable	1			1	See Appendix C
ICT	Systems Admin	Final Report	Medium Reasonable	2		2		Due to the sensitive nature of the audit the report is not published
Key Control	Human Resources	Final Report	Medium Reasonable	5		2	3	See Appendix C
Governance	Risk Management	Draft Position Statement						
ICT	Data Recovery Capabilities	Final Report	Low Substantial	1			1	Due to the sensitive nature of the audit the report is not published

Audit Type	Audit Area	Status	Opinion	No of Rec	Priority			Comments
					1	2	3	
2021/22 Audit Plan								
Support	Business Grant Funding	Complete	N/A	-				Head of IA seconded to Council to support processing of Mandatory and Discretionary Business Grants from November onwards
Support	Business Grant Funding – Post Payment Assurance	On-Going	N/A	-				Head of IA working with Counter Fraud Manager to support post payment assurance review
Support	Environmental Services Improvement Programme	On-Going	N/A					Support to the Programme
Support	Ubico – New Shareholder	Complete	N/A					Support to Project Team
Operational	Accounts Payable	In Progress						Quarterly review of payments made
Operational	Fire Risk Assessments	Draft Report						
Support	Civica – Merge of 3 Systems	Complete						Support to Project Team
Operational	Procurement Cards	Scope Agreed						
Operational	Emergency Planning	In Progress						
Operational	Election Expenses – Treatment of VAT	Audit Deferred						Request to defer audit to 2022/23 due to change in officers
Operational	Procurement (Contract Management and Monitoring)	In Progress						
Governance	Governance of Programmes and Projects	Audit Brief drafted						



Audit Type	Audit Area	Status	Opinion	No of Rec	Priority			Comments
					1	2	3	
Operational	Publica Performance Information	Audit Brief drafted						
Key Financial Control	Revenues and Benefits							
	<ul style="list-style-type: none"> <li>Council Tax and National Non-Domestic Rates</li> </ul>	Scope Agreed						
	<ul style="list-style-type: none"> <li>Housing and Council Tax Benefits</li> </ul>	Scope Agreed						
Key Financial Control	Core Financials							
	<ul style="list-style-type: none"> <li>Accounts Payable</li> </ul>							
	<ul style="list-style-type: none"> <li>Main Accounting and Accounts Receivable</li> </ul>	Audit Brief Drafted						
	<ul style="list-style-type: none"> <li>Payroll</li> </ul>	Audit Brief Drafted						
	<ul style="list-style-type: none"> <li>Treasury Management and Bank Reconciliation</li> </ul>	In Progress						
Key Financial Control	Human Resources							
Key Financial Control	Other Support Service provided by Publica <ul style="list-style-type: none"> <li>Procurement (Compliance with Strategy)</li> </ul>							
Grant Certification	Disabled Facilities Grants							
Grant Certification	Restart Grants	In Progress						

Audit Type	Audit Area	Status	Opinion	No of Rec	Priority			Comments
					1	2	3	
Follow-Up	Follow-Ups of Recommendations made in Substantial and Reasonable Audits	On Going						
Other Audit Involvement	Working with the Counter Fraud Unit	On Going						
Other Audit Involvement	Management of the IA Function and Client Support	On Going						
Other Audit Involvement	Contingency – Provision for New Work based on emerging risks							



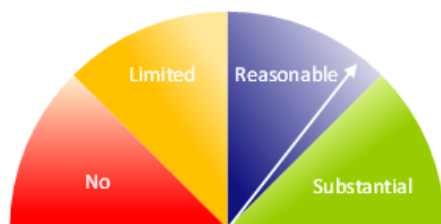
The following information provides a brief summary of each audit review finalised since the last Committee update

## Payroll – Final Report – June 2021

### Audit Objective

To provide assurance key controls within Payroll are operating effectively to ensure that payments are accurate, appropriately authorised and made in a timely manner, also that the risks of fraudulent payments are minimised.

### Assurance Opinion



There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.

### Number of Agreed Actions

Priority	Number
Priority 1	0
Priority 2	0
Priority 3	1
Total	1

### Risks Reviewed

Salary payments are made incorrectly or fraudulently resulting in financial loss and reputational damage.

### Assessment

Low

### Key Findings



Payroll processes have not changed because of home working. Basic payroll process notes were supplied for review along with the monthly payroll checklist. Review of the checklist found some items were not completed; changes will be made to the checklist going forward to ensure the correct tasks and reports are included. Process notes will also be updated to state when they were last reviewed.

One recommendation from 2018/19 has been implemented. Two previously outstanding recommendations now have compensating controls in place. One recommendation from 2019/20 is still outstanding, detail of this is included at appendix 2 of the report.



Reconciliation of payroll to the general ledger for all clients is not undertaken, but year-end reconciliations of control accounts is completed, and this is operating effectively.

We received satisfactory responses to our sample testing queries to support permanent and temporary contract variations were processed in accordance with guidance.

All payroll files are reviewed and authorised by an independent manager prior to processing the payments. Monthly variance reports are produced for all client payrolls to investigate exceptions and these are reviewed by a senior officer.

### Audit Scope

The areas reviewed are as follows:

- Key Controls – Reconciliation of payroll to the general ledger, production and independent review of exception reports, payroll authorisation process.
- Follow up of recommendations made in previous audits.
- Sample testing of permanent and temporary contract variations processed between April 20 – February 2021.

Discussions were held with the Publica HR Manager – Recruitment, Business Centre & Payroll.

### Other Relevant Information

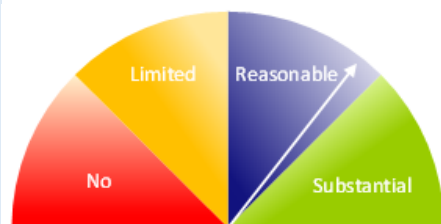
Due to Covid-19, payroll officers are working from home unless essential they need to be in the office. Documentation required for new starters, leavers and variations to contracts is the same as before the pandemic but supplied via email. Policies on the Publica Portal contain guidance for the parts of payroll processes delegated to service areas (self-service in BWO), these have been reviewed within the last 2 years but not since Coronavirus.

## Accounts Payable – Final Report – June 2021

### Audit Objective

To ensure the Council has an effective control framework in place for its Accounts Payable / Creditor's function.

### Assurance Opinion



There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.

### Number of Agreed Actions

Priority	Number
Priority 1	0
Priority 2	1
Priority 3	2
Total	3

### Risks Reviewed

Fraudulent, invalid, or late payments are made resulting in financial loss and / or reputational damage.

### Assessment

Low

### Key Findings



There is currently no way to monitor when an amendment has been made to a supplier account in Business World On!. The AP Team Leader confirmed she will escalate this with Publica Business World On System Support to find a solution.



Some of the process documentation supplied was last reviewed in 2017, and the new supplier form was not found to contain up to date guidance. We were advised documentation will be reviewed.



Sample testing found a discrepancy with one suppliers sort code, this was confirmed with the supplier over the phone. Going forward, all supplier payment details will be confirmed by the supplier in writing.



Invoice approval limits are automated and managed via Business World On! and there are 6 assigned approver levels across all clients. Payment files are independently reviewed and authorised, and since Covid-19 these are signed off electronically via email. Sample testing found all new suppliers had a new supplier form and an accompanying checklist completed to support details had been checked and approved by another Officer for accuracy and potential duplicates. The service KPI of at least 95% of all invoices being paid within 30 days of receipt is monitored quarterly, and anything under 95% is investigated by the AP Team Leader. These figures are reported quarterly to the Publica Board.

### Audit Scope

A review of Accounts Payable undertaken in April 2021 covered the following:

- payment approval process
- exception reporting
- the creation, amendment and management of creditor master file data.

Discussions were held with the Publica Accounts Payable Team Leader, and processes were discussed.

The Accounts Payable Continuous Assurance reports were also analysed, and each Council's performance and trends were assessed.

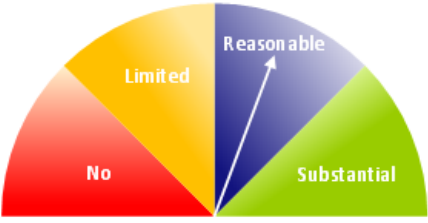
### Other Relevant Information

Continuous assurance work to identify duplicates is undertaken and reported to each Council on a quarterly basis. Information in these reports was further analysed and found the number and total value of payments made has seen decreases at each council compared to the previous financial year. The average number of days to pay suppliers has seen an increase at each council compared to the previous financial year. PO usage averages did not vary by more than 10% at each Council. These findings can be attributed to changes resulting from the COVID-19 pandemic and AP Officers being heavily involved in processing Covid-19 grant payments.






## Human Resources (Learning and Development) – Final Report – June 2021

### Audit Objective

To provide assurance that the electronic learning system in place is effective and meets the needs of staff in line with training and development objectives of the organisation.

Assurance Opinion		Number of Agreed Actions		Risks Reviewed	Assessment
	<p>There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.</p>	Priority	Number	<p>If the e-learning system in place is not effective, staff training needs will not be met which could lead to compliance risk and staff dissatisfaction</p>	<p><b>Medium</b></p>
		Priority 1	0		
		Priority 2	2		
		Priority 3	3		
		Total	5		

### Key Findings

	Access to mandatory training via iHasco is not automatically granted to or required of external partnership workers (e.g. Internal and External Audit) or temporary agency staff working for or on behalf of Publica/the Councils. Members also do not currently have access to mandatory training via iHasco.
	The Publica Learning and Development Guidance and associated forms (Training Brief form and Learning Contract) have not yet been submitted for review and approval by Employee Trade Unions.
	There is no Learning Management System in place. The adaptability of the Learning & Development team is, however, demonstrated in the delivery of training using several methods including iHasco, which is an online provision for mandatory and compliance training certified by the Institute of Occupational Safety and Health (IOSH), and Google Classroom for bespoke internal training.
	There is no centralised record held of staff training and learning, and no clear process in place for ongoing monitoring and of training completion by management. There is no evidence of regular reporting to key officers (e.g. Health and Safety Business Partners) and Senior Management on training completion rates.
	Individual staff training needs are identified by managers using one-to-ones. iHasco allows for limited course feedback. Collating and analysing this information to identify trends could enhance training needs identification to benefit the wider staff, but the limitations of the current systems and current resourcing do not allow the Learning and Development Team to do so.

### Audit Scope

This audit included a review of the following:

- Key documents supporting the delivery of training by the Learning & Development Team, including the Publica People Strategy and the Learning and Development Guidance
- iHasco and Google Classroom – the systems used to deliver or facilitate staff training, including training records, management information and functionality
- Course completion data
- One-to-ones and training feedback, and how these are used to inform training and ensure the training needs of staff are met
- Mandatory training
- Management information and reporting


### Observations

The Talent Development Business Partner covers some responsibilities of a Business Manager role in addition to his current role. The Talent Development Business Partner is now directly line managed by the Head of HR.

## Authority's Response to Covid-19 – Final Report – June 2021

### Audit Objective

To provide assurance that the response to COVID-19 was robust and responsive to the needs of staff, customers and in line with national Government guidelines.

Assurance Opinion	Risks Reviewed	Assessment
 <p>A sound system of governance, risk management and control exist, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.</p>	<p>If the response to the COVID-19 pandemic was ineffective and lacked proper coordination, this may have resulted in a risk of service failure and reputational damage.</p>	<p style="text-align: center; background-color: #92d050;">Low</p>

Key Findings	Observations
<p><b>Substantial</b> ICT</p>	<p style="text-align: center;">0</p>
<p><b>Reasonable</b> Health &amp; Safety of Staff</p>	<p style="text-align: center;">1</p>
<p><b>Substantial</b> Key Service Delivery</p>	<p style="text-align: center;">0</p>
<p><b>Substantial</b> Staff Wellbeing Arrangements</p>	<p style="text-align: center;">0</p>
<p><b>Substantial</b> Community Response</p>	<p style="text-align: center;">0</p>
<p><b>Substantial</b> Emergency Response &amp; Liaison with Appropriate Agencies</p>	<p style="text-align: center;">0</p>
<p><b>Substantial</b> Emergency Decision-Making Arrangements</p>	<p style="text-align: center;">1</p>

Audit Scope
<p>Our overarching review to address the above objective has covered the following areas:</p> <ul style="list-style-type: none"> <li>• ICT – equipment, Data Protection considerations and arrangements to allow staff to work from home.</li> <li>• H&amp;S of staff – arrangements allowing staff to safely WFH.</li> <li>• Key service delivery – arrangements in place to ensure customer access to previous face-to-face services</li> <li>• Staff wellbeing arrangements.</li> <li>• Community response.</li> <li>• Emergency response and liaison with appropriate agencies.</li> <li>• Emergency decision-making arrangements.</li> </ul>

### Background

At the beginning of the pandemic, the Publica Managing Director asked a Group Manager to take locality lead for West Oxfordshire District Council. The locality lead had oversight and aided coordination of the Council's response to COVID-19, as well as having a strategic role in the wider County response to the pandemic. Local Management Teams (LMTs) were set up at each of the Councils and met regularly and collaboratively to maximise efficiency in the response, and to allow decision making at the pace required to react to the pandemic. Recovery Groups were also established and included Members to ensure that representation from all required parties when making decisions. The Chief Executive Officer at the Council exercised the right to use emergency powers, and decisions made were retrospectively reported to the relevant Committee, Cabinet or Council as appropriate.

The initial key priority for the Council was to ensure the safety and wellbeing of vulnerable residents within the district. Community Resilience Hubs were established, and the Council worked successfully with local charities and volunteer agencies to ensure that food parcels and prescription medication were delivered to those who were shielding and were unable to leave the house. Staff wellbeing was also a key consideration with a quick and effective move to home working for the majority of staff facilitated by all 3 Councils and Publica. Supporting local businesses was also a priority. The Council worked hard to distribute the many versions of COVID-19 business grants throughout the period, as well as supporting the reopening of the high street and providing business packs and guidance to businesses throughout the district.

**ICT**

Due to the previous rollouts of laptop computers to enable agile working and aid business continuity, the majority of Publica and Council staff were already equipped to be able to work away from the office for extended periods of time. Software solutions to enable communication over data and voice streams were already mainly in place. There was no added pressure to enable the mobilisation of an existing static workforce, however, challenges were encountered with unprecedented demand on remote working technical capacity. The ICT department responded quickly to increase capacity enabling stable remote connectivity for all staff across multiple clients to aid a continuity of service. Where necessary, approval was given to staff to obtain equipment such as keyboards, mice and monitors from the office to ensure they had the required equipment to be able to work adequately from home. We were advised that an inventory of equipment taken was recorded by line managers. The ICT service extended their standard hours of IT support from 7am through to 7pm as a reflection of the increased amount of flexible working including non-standard working hours for many employees as an impact of the pandemic.

All staff were required to complete Data Protection and IT Security training through Bob's Business in September 2019. No cyber-security awareness training was mandated for all staff to re-enforce good cyber-security practices whilst working remotely throughout 2020, although messaging was placed on the internal intranet as a reminder to staff of the cyber threats faced. GDPR training was rolled out in March 2021 to all staff, using iHasco. Cyber Security training was also scheduled for March 2021 but has not yet been rolled out. As part of the 2021 Anti-Malware audit, we suggested consideration was given to bring forward full cyber-security user awareness training which is currently planned for Q4, 2022.

Overall, considering the pressures of the unprecedented situation caused by the pandemic, Publica staff working on behalf of the Council were fully supported by the response of the Publica ICT service. This enabled them to both continue existing services, and to handle many new issues as they arose.

**Health & Safety of Staff**

During the pandemic, Publica Senior Management charged Business Managers with the responsibility of determining how frequently they contacted their staff members to check on their wellbeing. Publica guidance was provided on lone working and personal safety and home working. Meetings with Service Managers found differences between service areas on how much contact was had between staff members and their line managers, but in all cases this was at least weekly. These arrangements are adequate to check on staff wellbeing but could be enhanced to ensure staff safety whilst working remotely from home.

Between March 2020 and Feb 2021, managers were required to record staff related data daily including numbers working from home and from the office. From February this was moved to weekly recording. The Health & Safety Executive (HSE) states that there are greater risks for lone workers (including home workers) with no direct supervision or anyone to help them if things go wrong. To help mitigate against the risk of lone working, consideration should be given to implementing a system to ensure all staff are safe and present each day.

Display Screen Equipment (DSE) health and safety home workplace assessments were emailed to all staff to complete. All Service Managers contacted confirmed staff members had access to the office equipment they needed. There were discrepancies between the service areas we contacted and whether service risk assessments had been updated in response to the pandemic. A recommendation has been made in our Lone Workers Audit which should address this and ensure a consistent approach to the completion of risk assessments.

In the short-term staff are still working from home where possible, but for those who need to be in the office it is a socially distanced working environment. Staff members have also been encouraged to take part in the twice weekly Lateral Flow Tests, and self-testing kits are available from the receptions at Coleford and Cirencester. An Agile Working Group has been established to plan and implement the Agile Working Strategy and necessary arrangements to ensure safe return to the offices for staff.

**Observation**

**As staff continue to work from home, treating them as lone workers could help to ensure they are safe and present at work each day. This will lessen the likelihood that absences due to illness or accidents go unnoticed and ensure compliance with employer health and safety requirements.**

### Key Service Delivery

Customer access to key services including Customer Services, Revenues & Benefits and Housing & Homelessness Services has been maintained successfully throughout the pandemic. The major change to access to these services came when the public reception areas of the Council offices were closed in March 2020, in line with Government advice and to prioritise the safety of customers and staff. Customers were encouraged to access these services by telephone or email, or to 'self-serve' using information and reporting functions on the Council's website. Face-to-face appointments were made available in emergency or urgent cases, but we were advised that few were taken up at the Council.

The Group Manager - Resident Services advised that the demand for the above services heavily increased, especially at the beginning of the pandemic. Incoming calls to Customer Services were heightened, and Revenues & Benefits saw a higher number of claims being made as people were adversely financially affected by the pandemic through job loss, reduced working hours etc. In March 2020, the Minister for Local Government and Housing requested that local authorities urgently accommodate all rough sleepers, adding demand to the Homelessness Service.

It should be noted that the Revenues team were also required to process and pay out all COVID-19 business grants that were required of central Government within strict timeframes, in order to support local businesses. The implementation of the Civica system to replace Northgate at CDC and WODC was also led by the Revenues team, going live in Dec 2020/Jan 2021.

We were also advised that 96 of the 360 staff within Resident Services working across the 3 councils, were redeployed to community response work at the beginning of the pandemic, providing crucial support to each of the Councils' wider response. Resourcing was highlighted as one of the main challenges of the pandemic for Resident Services, trying to find a balance between supporting the wider pandemic response and resourcing services adequately as demand increased.

### Staff Wellbeing Arrangements

Publica fund several resources in relation to health and wellbeing that were available to all staff during the pandemic, including an Employee Assistance Programme (EAP) and Medicash. Using these, staff could access 24/7 helplines for counselling and stress management, courses and programmes to help with health and wellbeing, and complementary treatments (e.g., massages) could be claimed back via Medicash.

Additionally, throughout the pandemic a significant number of posts were made on the Publica Portal newsfeed to signpost staff to relevant resources and support from external sources. Relevant material was posted in a timely manner in relation to the pandemic itself along with both internal and Government guidance. Training courses were also made available to all staff via iHasco, including Mental Health Awareness and Stress Awareness.

At the time of audit work (March/April 2021), five Staff Wellbeing Surveys had been carried out. Each survey had a set of standard questions so that trends could be analysed, and then tailored questions based on the situations within the organisation/wider world at the time (e.g., working equipment, support, communications). The survey had a good completion rate considering the size of the organisation, with around 300 respondents each time. HR Business Partners contacted all staff that raised concerns or indicated that they may need further support via the survey, signposting to relevant resources or making suitable arrangements for everyone.



### Community Response

A review of Council's newsfeeds and discussions with Managers involved has provided us with a good understanding of action taken to support the community in response to the pandemic. Many Publica employees were redeployed to support the pandemic response, with tasks including direct support of welfare checks on thousands of Clinically Extremely Vulnerable (CEV) residents across the districts.

In addition to COVID-19 business grant payments, the Council has also sought to support local businesses with additional Council led initiatives. Good examples of this include producing checklists for local business on how to work safely and maintain social distancing, waiving outside seating application fees and by distributing coronavirus stickers and posters to be used by business reopening.

The Council collaborated with the Health and Safety Executive (HSE) to provide advice and proactive guidance to local businesses to support them in meeting their Covid secure responsibilities. They are also working with local health authorities to support the understanding of any patterns in confirmed coronavirus cases.

Grants to support local Voluntary and Community Sector (VCS) groups working with food and essential supply services were made available and promoted. Community teams have been directly involved in supporting and connecting VCS groups with vulnerable residents.

A vital achievement for the Council was the ability to react to the pandemic by working collaboratively with Publica, partner organisations and VCS groups to identify and respond to the needs of the community. It is recognised that the relationships built will have a lasting future benefit for the Council.

### Emergency Response & Liaison with Appropriate Agencies

Once a major incident had been declared, the Thames Valley LRF's (Local Resilience Forums) co-ordinated a multi-agency approach to the Coronavirus emergency. Regular meetings of the LRF's were held and these were attended by officers on behalf of the authority.

Subgroups were formed internally to deal with Covid-19 related issues to ensure tasks were undertaken, such as providing wellness calls and ensuring medicine was delivered to vulnerable people. We were advised a resourcing subgroup worked to determine who was available or best placed to help with a situation.

Local Authorities have a duty to plan for and respond to civil emergencies. Coronavirus has been an emergency unrivalled in recent times due to its wide reaching and unchartered nature. From the information provided we can assess the response has been proportionate but we were advised positives and areas to be improved can be taken from the experience, and the Corporate Recovery Plan will be reviewed in light of lessons learnt from the pandemic.

### Emergency Decision-Making Arrangements

Frequent changes in legislation during the initial stages of the pandemic led to the temporary suspension of face-to-face Council meetings and a subsequent break in the democratic decision-making process. As such, urgent decisions were required by authorised officers in response to the changing situation.

During the virtual WODC Council meeting on 13 May 2020 it was noted that the urgent situation caused by the pandemic highlighted the fact that there are insufficient emergency/urgency powers available to take decisions where it is not possible to obtain the approval of the Council, Cabinet or a Committee. It was therefore recommended that Council authorised the Chief Executive, in consultation with the Chief Finance Officer and/or the Monitoring Officer as appropriate, to take any necessary decision in cases of emergency and in relation to any function of the Cabinet or Committee where the matter is urgent and cannot reasonably await the next meeting. This is subject also to consultation with the Leader, or in their absence the Deputy Leader of the Council. We found that decisions taken were in line with authority and legislation, were fully documented and subsequently presented to Council in subsequent meetings from October 2020 through April 2021.

#### *Observation*

**We note that the urgent responses to the pandemic highlighted the need for the WODC Chief Executive to be afforded emergency powers and this was agreed during the meeting on 13 May 2020. The report also noted that the need for emergency powers could also apply to situations other than this pandemic. The granting of emergency powers was not given a specific timeframe, and no mention was made of a permanent change to the Council's Constitution. Therefore, consideration should be given to whether a formal update to the Constitution should be an appropriate course of action and subsequently updated on the Council's website.**

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Systems Admin 45115	2	Previous Recommendations not implemented		Jan 2022	
Systems Admin 45236	2	Some controls not as robust as expected		Jan 2022	
Accounts Payable 45450	2	Amendments to supplier accounts cannot be monitored.	We will contact Publica Business World On System Support & Maintenance to investigate how we can monitor amendments made to supplier accounts, and we will monitor account amendments weekly.	Sept 2021	
Human Resources 45249	2	Third parties and/or temporary staff working for or on behalf of the Council are not required to carry out mandatory training modules	Consideration will be given to providing access to individuals with access to the Publica/Council network and/or working on Publica/Council premises with access to mandatory training via the current e-learning systems in place, including temporary agency staff, external partnership workers and Members.	Mar 2022	
Human Resources 45287	2	The Publica Learning and Development Guidance and associated forms (Training Brief form and Learning Contract) have not been fully approved by relevant Employee Trade Unions.	The Publica Learning and Development Guidance and associated forms will be submitted for review and approval by Employee Trade Unions, and upon approval will be submitted for formal adoption by Publica.	Sept 2021	

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Council Tax and NNDR 44610	2	The Revenues Technical Lead reviews suppressed accounts but is also able to add suppressions to accounts. To ensure there is separation of duties and mitigate against accounts being suppressed and not checked, the Revenues Technical Lead should have his suppression permissions removed.	To ensure there is separation of duties, the Revenues Technical Lead should have his suppression permissions removed.	Mar 2021	Revenues Manager to monitor the Revenue Technical Lead's suppression activities.  Further follow- up will be undertaken during the 2021/22 annual audit.
Housing Benefits and Council Tax Support 44592	2	At the time of audit work the Business Partner Accountant advised that due to the increased workload brought about by Covid-19, reconciliation of Housing Benefit has not been undertaken so far during this financial year.	It was confirmed that it will be undertaken as soon as workloads allow.	Jan 2021	Ledger reports have been issued to the service and have been reconciled to Northgate and Open Revenues.  Further follow- up will be undertaken during the 2021/22 annual audit.
ICT Incident Management 44560	2	As part of the Information Security framework of policies, the Incident Management Policy is out of date and requires review, update, and approval. Update of the policies has been impacted by the Covid-19 pandemic, and the need for a review is recognised by the ICT Audit & Compliance Manager.	ICT Audit and Compliance Manager will review and update all ICT Security Policies following the completion of the Cyber Security audit report. The aim to have drafted policies by April 2021 for circulation to all network users.	Apr 2021	The refresh and update of all ICT Policies is in progress, however the new target date for completion and issue of draft Policies for review/input, is 30 September 2021.
ICT Incident Management 44562	2	There is a lack of detailed standard operating procedural documentation. Incident management investigation is currently based on a high-level process flow-chart denoted in the Incident Management policy; however, this lacks detailed information on how to conduct an incident investigation.	We have now commenced with documenting our cyber incident and investigation managements procedures	Jan 2022	Ongoing  The ICT Audit and Compliance Manager is working with the Security Engineer on an incident playbook that define the procedures and steps to be taken during an incident investigation. On target for completion by January 2022.

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Payroll 43699	2	We recommend that all new starters are subject to a BPSS (or similar) check regardless of the role to which they are being recruited. This will ensure that consistent checks of right to work, employment history and basic criminal record checks are carried out on all employees.	A piece of work has been carried out to re-write the pre-employment check process. The HR and Recruitment Teams are also working towards the implementation of an Application Tracking System (ATS), subject to approval at Publica and the Councils, which would help to mitigate the risks identified. The ATS would not allow for progression in the recruitment and onboarding process without specific criteria being fulfilled first (e.g. obtaining references, ID checks etc).	Sep 2020	<p>We were advised that the current HR Pre-employment screening procedures are based on 'types of job' and 'appointments' whereby risk assessments are conducted to set the screening requirements for different types of jobs. They also ensure BPSS checks are performed on all employees who have access to sensitive information.</p> <p>The Applicant Tracking System was recently introduced.</p> <p>Agreed action completed.</p>
Health and Safety – Fire Risk Assessments 43147	2	We recommend that officers should ensure all remedial actions identified in fire risk assessments are completed using a risk-based approach.	These remedial action requirements are in progress and will be completed in accordance with the noted time scale.	Sep 2020	<p>The agreed action has been followed up and some remedial actions have been completed.</p> <p>A full audit of Fire Risk Assessments is in progress and will include further follow-up of this recommendation.</p> <p>Recommendation closed.</p>
Procurement and Contract Management 41049	2	We recommend that assurance is sought from Publica that contracts held and managed on behalf of the Council are monitored and managed effectively.	Publica colleagues have been requested to respond to the recommendations made in the report issued. Assurance has been requested that contract management and monitoring is undertaken.	Sep 2020	<p>Publica have included 'Get commissioning right' as one of the four priorities in their 2020-22 Business Plan, including Procurement in the supporting Action Plan (Strategic Action 8). Good progress has so far been made towards outstanding recommendations from both the Procurement and the Procurement and Contract Management audits.</p> <p>An audit on Contract Management and Monitoring is in progress, this recommendation will be reviewed as part of the new audit.</p> <p>Recommendation closed.</p>

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Accounts Receivable 43752	2	Duplicate subscriptions should be reviewed, and appropriate corrections made. Any duplicate payments should be returned to the debtor.	All subscriptions will be corrected where applicable. Will discuss with team to ensure that prior to setting up new subscriptions a search for existing subscriptions is performed. If any queries arise the AR officer will refer to the service area for clarification. Responsible Officer – AR Team Leader	Aug 2020	Finding has been actioned.  Agreed action completed.
Systems Admin 41204	2	We recommend a principal Identity and Access Management process detailing requirements for 'Joiners, Movers and Leavers' is developed and documented and that complies with the requirements set out in the Information Security and Access Control Policy. The overarching process should apply to and embrace all systems that may not be included within the standard ICT team scope and should be available for all employees to view and follow. System administrators should then document or update local processes and procedures that should be in alignment with the overarching policy and process requirements. and documented on a quarterly basis as per the requirements of the Risk Management Policy	Our team ICT Administrators are now updating and documenting our Access Management system process for joiners, Movers and Leavers. A change control process will be introduced that will document significant changes to the ICT infrastructure which will also align to our ICT User Policies and guidance.	Mar 2020	Flowcharts have been produced for the starters / leavers / variation processes. The ICT Audit and Compliance Manager will refresh the ICT Policies following the completion of the Cyber Security audit report. He is aiming to have drafted policies by March 2020 for circulation / consultation at CGG and JMT.  Further follow-up has been included in the 2020/21 audit plan  Revised implementation date to 31/12/20 due to Covid-19. Annual audit is in progress.  The original recommendation related to an Identity & Access Management Process, which is in place.  Recommendation closed.

## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Members and Officers Declaration of Interest 40715	2	We recommend that the Counter Fraud Unit reviews the officers' declarations of interests, gifts and hospitality process as part of their planned work in 2019/20.	The Counter Fraud Unit will include a review of the officers' declarations of interest, gifts and hospitality process as part of work planned for 2019/20.	Mar 2020	<p>A new form was published on the portal on 14th April 2021, for Publica, and Retained Staff, to complete.</p> <p>The form features questions which will identify any business and personal interests that could conflict with the interests of Publica or its partner councils.</p> <p>The form also includes a statement / question in respect of gifts and hospitality (with reference being made to the policy)</p> <p>Recommendation Closed</p>
Council Tax and NNDR 42894	2	Periodic review (quarterly) of accounts in credit should be undertaken and action taken to return monies that are not due to the Council. These actions must be documented on customer accounts to provide an audit trail. Where monies are unable to be refunded, appropriate accounting actions must be undertaken to remove the credit value from the CT / NNDR system.	Putting into place a periodic report of credit accounts to be followed up by Revenues Officers	Mar 2020	<p>Following the conversion of the Revenues system from Northgate to Civica, the team have been dealing with a backlog, which has taken precedence over dealing with refunds of credits on closed accounts.</p> <p>We have recently received more resource within the team by having two Council Tax Specialists fall under our remit rather than Customer Services and will therefore task them with this job on a more regular basis going forwards.</p> <p>Further follow- up will be undertaken during the 2021/22 annual audit.</p>



## High Priority Findings and Agreed Actions

## APPENDIX D

Audit Name	Priority	Finding	Agreed Action	Due Date	Update September 2021
Procurement 41323	2	To ensure all transactions are raised and approved appropriately and in line with the current organisational structure, all requisitioning and approval permissions should be reviewed in BWO.	Following the recent organisation changes, the approvals permissions will be reviewed to ensure they are aligned with new roles and implemented accordingly on the ABW system.	Dec 2019	<p>We were advised:</p> <ul style="list-style-type: none"> <li>• A review of ABW requisitioner and approver roles is currently in progress.</li> <li>• Together with the finance team, the ABW support team aim to review all clients over the coming months.</li> <li>• Work on FoDDC approvers is still underway.</li> </ul> <p>We have followed up this finding and are waiting for a response from the Group Manager.</p> <p>An audit in respect of system access is planned for 2021/22. This recommendation will be followed up in the new audit.</p>
Procurement 41029	2	Budget Holders should regularly undertake monitoring of expected contract spend to actual contract spend as part of contract monitoring, to ensure contracts are managed in accordance with strategy, and inform Procurement of any changes to contract values to ensure the values recorded on the Contract Register are correct.	Agreed	Dec 2019	<p>No evidence has been provided of actions carried out by responsible officers to support implementation of this recommendation at the time of follow-up.</p> <p>As part of the 2020/21 Audit Plan, an audit of the Management and Monitoring Contracts will be carried out. The scope of this audit will include budget monitoring arrangements in relation to contract spend and will therefore inform the follow-up of this recommendation.</p> <p>Revised implementation date to 31/12/20 due to Covid-19. We have followed up this finding and are waiting for a response from the Group Manager.</p> <p>An audit on Contract Management and Monitoring is in progress, this recommendation will be reviewed as part of the new audit.</p> <p>Recommendation Closed</p>

## Summary of all Agreed Actions from April 2020 and Progress against them

WODC ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/20)	0	2	1	3
Open and current	0	0	0	0
Open and Outstanding/Overdue Subject to follow up	0	1	1	2
Open with date extended	0	1	0	1
Closed	0	0	0	0

PUB ONLY	Priority			
	1	2	3	Total
TOTAL in Audit Period (From 4/20)	0	5	8	13
Open and current	0	5	6	11
Open and Outstanding/Overdue Subject to follow up	0	0	1	1
Open with date extended	0	0	0	0
Closed	0	0	1	1

