

ISLE OF ANGLESEY COUNTY COUNCIL		
Report to:	Audit and Governance Committee	
Date:	19 September 2018	
Subject:	Outstanding Internal Audit Recommendations / Issues & Risks	
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Nature and Reason for Reporting: This report provides an update on the status and detail of the outstanding risks that Internal Audit has raised.		

1. Introduction

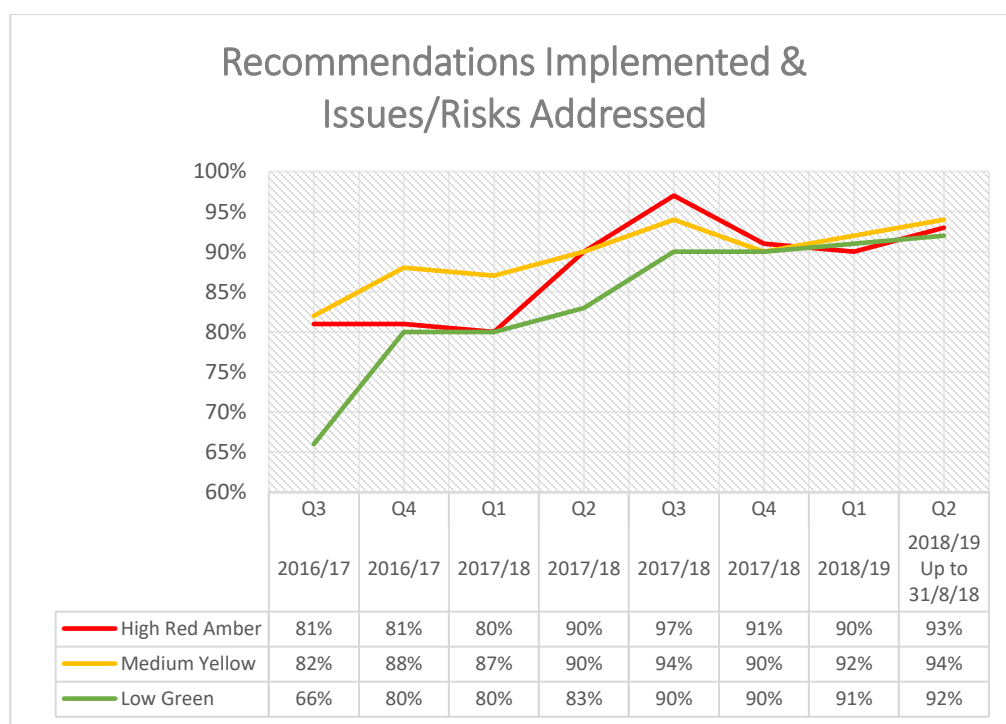
- 1.1. The Audit and Governance Committee requested details of all the outstanding recommendations twice a year. The last report was presented to the 13 February 2018 meeting.

2. Recommendation

- 2.1. That the Audit and Governance Committee notes the Council's progress in addressing the outstanding Internal Audit recommendations and risks raised since 1 April 2014.

3. Performance of Implementing Outstanding Recommendations / Risks Raised by Internal Audit

- 3.1. As previously reported, Internal Audit has moved away from making recommendations to raising 'Issues' and 'Risks'.
- 3.2. To encourage management to have ownership for the risks, it is their responsibility to develop an action plan to address the issues / risks identified.
- 3.3. Issues / risks are followed up by monitoring how the risks have been addressed. Reports which have received Limited or Minimal Assurance are part of a formal follow up process where we will not close risks until management has taken sufficient action to address the risks. We monitor all other issues / risks through the self-administered corporate recommendation tracking system.
- 3.4. To provide the Committee with trend information, the graph below highlights the performance in implementing the recommendations / addressing the risks:



- 3.5. As can be seen, the Council is steadily improving its performance with the overall implementation percentage currently at **93%**.

4. Current Outstanding Recommendations / Risks

- 4.1. As at 3 September 2018, the Council has the following outstanding recommendations / risks and issues with a target implementation date of 31 August 2018 (detailed in [Appendix A](#)):

Up to 31/08/2018	High	Red	Amber	Medium	Yellow	Low	Green	Totals
Total Implemented	76	9	51	320	90	201	32	779
Total Not implemented	0	2	8	5	19	17	4	55
Total	76	11	59	325	109	218	36	834
% Implemented	100%	82%	86%	98%	83%	92%	89%	93%
% High Red Amber Implemented	93%							
% Medium Yellow Implemented				94%				
% Low Green Implemented							92%	

- 4.2. The **two** red risks currently outstanding are detailed below and are currently the subject of follow up reviews:

Ref	Issue / Risk	Date Raised	Agreed Target Date	Responsible Officer	Comments
Child Care Court Orders under the Public Law Outline (Children's Services)					
4	Support worker visits were not found to have been conducted in accordance with the care plan during court proceedings. There is a risk of emotional and / or physical harm to the child.	27/01/17	31/01/18 (changed from 31/03/17)	Support Service Manager	Results of First Follow Up: Failure to comply could lead to disciplinary proceedings being followed against member of staff.
Corporate Procurement Framework – Corporate Compliance (Housing Service)					
5	The Council does not have assurance that all its expenditure has been properly procured and it is possible that the Council has incurred expenditure where no formal competitive procurement exercise has been undertaken. Consequently, fit for purpose contracts are not in place and issues such as safeguarding, safety and value for money have not been considered.	07/09/17	31/03/18	Head of Housing	Corporate Procurement Manager confirmed that the Procurement Team is available to assist and advise as necessary.

Appendix A – Outstanding Recommendations / Risks

All High, Red and Amber Rated Internal Audit Recommendations Outstanding with target date up to 31/08/2018

Ref	Report	Recommendation / Issue/Risk	Date Raised	Agreed Target Date	Responsible Officer	Comments
Children's Services						
1	Child Care Court Orders under the PLO 044 2016/17	<p>1 Testing highlighted that The Care Proceedings, Public Law Outline and Legal Matters 2016 Protocol was not always followed in circumstances requiring swift action. An Emergency Legal Gatekeeping meeting was not held within 24 hours of the decision being made to hold an Emergency Legal Gatekeeping Meeting.</p> <p>This can lead to appropriate actions and decisions not being made in a timely manner with a risk of a child being emotionally and / or physically harmed.</p>	27/01/17	31/01/18 changed from 31/09/17	Service Manager Corporate and Partnership.	<p>First Follow Up 161744f1 – A new Service Manager for Intensive Intervention who came into post towards the end of November 2017 has reviewed current working arrangements to ensure that emergency Legal Gatekeeping Meetings are held within 24 hours of the decision being made.</p> <p>The tracking and monitoring of cases discussed in Legal Gatekeeping meetings is now being more robustly supported by the Business Support Team Manager. During a meeting held on 4.1.18 changes and amendments were agreed to the Legal Gatekeeping Log and Court Tracker to ensure there is compliance with the Procedure.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>
2	Child Care Court Orders under the PLO 044 2016/17	2 Team Managers' approval of decisions to proceed cases to Legal Gatekeeping meetings are not being documented. It was also found that documents such as pre-proceedings meetings, PLO review meeting records, pre-proceedings letters, intention to issue letters and minutes were not always loaded onto the electronic system or were not	27/01/17	31/01/18 changed from 31/01/17	Service Manager Corporate and Partnership.	<p>First Follow Up 161744f1 – Decisions to proceed cases to Legal Gatekeeping meetings are now documented on the new electronic system, WCCIS by the Service Manager Intensive Intervention.</p> <p>During a meeting between Service Manager Intensive Intervention and Practice Leaders on 16.1.18 they were provided with all documents relating to the PLO process</p>

Ref	Report	Recommendation / Issue/Risk	Date Raised	Agreed Target Date	Responsible Officer	Comments
		<p>loaded promptly and cloned to relevant siblings' file.</p> <p>This leads to the information held being incomplete and an uncertainty on where the information is held which may result in a risk of insufficient evidence available when proceeding to court and an uncertainty whether the appropriate decisions were made.</p>				<p>and care proceedings and reminded that all documents should be loaded on WCCIS and cloned to siblings file.</p> <p>There are new arrangements for additional business support for the Practice Groups. This arrangement will enable administrative staff to support social workers in ensuring this task is undertaken effectively.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>
3	Child Care Court Orders under the PLO 044 2016/17	<p>3 Testing highlighted that the Letters Before Proceedings and Letters of Intent / Notice of Intention to Issue and pre-proceedings meetings did not always comply with the Care, Proceedings, Public Law Outline and Legal Matter 2016 Protocol. Further, the letters were not always sent to all persons with parental responsibility.</p> <p>Parents are therefore not properly informed of the process followed or decision made and what is expected of them in order to improve matters which may result in continuing emotional and / or physical harm to the child and distress to those involved.</p>	27/01/17	31/01/18 changed from 31/03/17	Service Manager Corporate and Partnership.	<p>First Follow Up 161744f1 – Revised documentation and letters in relation to care proceedings and PLO have been discussed and shared with Practice Leaders on 16.1.18 and are now being implemented. These have been shared with all Social Work staff and guidance given that all previous templates should be deleted.</p> <p>During a meeting between Service Manager Intensive Intervention and Practice Leaders held on 16.1.18 they were reminded that every effort should be made to identify the details of all persons with parental responsibility to ensure they are fully informed of the process.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>
4	Child Care Court Orders under the PLO 044 2016/17	<p>4 Support worker visits were not found to have been conducted in accordance with the care plan during court proceedings.</p> <p>There is a risk of emotional and / or physical harm to the child.</p>	27/01/17	31/01/18 changed from 31/03/17	Support Service Manager	<p>First Follow Up 161744f1 – Failure to comply could lead to disciplinary proceedings being followed against member of staff.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>

Ref	Report	Recommendation / Issue/Risk	Date Raised	Agreed Target Date	Responsible Officer	Comments
Housing						
5	Corporate Procurement Framework – Corporate Compliance 076 2016/17	5.1.3 The Council does not have assurance that all its expenditure has been properly procured and it is possible that the Council has incurred expenditure where no formal competitive procurement exercise has been undertaken. Consequently, fit for purpose contracts are not in place and issues such as safeguarding, safety and value for money have not been considered.	07/09/17	31/03/18	Head of Housing	Corporate Procurement Manager confirmed that the Procurement Team is available to assist and advise as necessary. Currently undergoing a second follow up. Progress to be reported to the next Committee meeting.
Resources						
6	PCI DSS Compliance 066 2016/17	1.1a There is no formal plan or programme which is regularly reviewed / updated, or when a major change occurs, to ensure corporate compliance with PCI DSS. This can lead to the work towards compliance being ineffective and inefficient with no timescales to ensure swift action and therefore non-compliance. Non-compliance can lead to increased transaction costs, reputational damage and / or restrictions or permanent withdrawal from payment card acceptance programmes.	21/09/16	01/06/18 changed from 30/09/16	Revenues & Benefits Service Manager	Upgrade of Capita Income Management to version 10. This will ensure an effective terminal management system P2P encryption of terminals and prices have been obtained to upgrade or purchase new terminals. (Target date 2 February 2018) The Council is also reviewing the recording of telephone calls and considering options under corporate system, and others. A price has been obtained. Issues of affordability have to be reviewed. Following the implementation of Version 10 the Council will tender for consultancy on corporate compliance with PCI DSS, and in particular with GDPR requirements which come in to force in May 2018. (Target 1 June 2018). Update 27/04/18 – Implementation of P2PE encryption terminals currently being implemented which will confirm Capita, as provider, are PCI DSS compliant – contract being signed. Once on – seek Sell2Wales

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						tender for Assessor for the whole Authority. (OYM) a current issue). Awaiting Consultant's Assessor's report. Update 31/05/18 – PCI DSS Project Improvement Plan in place. Draft PCI DSS out currently for consultation. Will be subject to a follow up during October 2018.
7	PCI DSS Compliance 066 2016/17	1.5a The debit / credit card environment of the Council has not been mapped to identify the type of transactions and where these are taken in order to ensure an understanding of the environment. There is therefore a risk that the Council is not aware of the card payment environment and are therefore unable to protect its security adequately leading to loss of cardholder data.	21/09/16	02/02/18 changed from 30/09/17	Revenues & Benefits Service Manager	First Follow Up 161766f1 - The assistance of the ICT Business Partner has been requested to map the credit / debit card environment. This will need to be completed in order to procure the services of the PCI DSS Assessor. Update 27/04/18 – Mapping of environment, Revenues and Benefits Manager to discuss with IT. Delay due to IT. Update 31/05/18 – Currently being undertaken. Implementation in accordance with PCI DSS Implementation Plan. Will be subject to a follow up during October 2018.
8	Housing Rents – Readiness for Universal Credit 171818	8 The Housing Service is currently providing tenants with the option to pay through standing order. Bank reconciliations are currently undertaken manually; therefore, payments made through standing orders may not be recognised and coded into the correct account promptly, depending on resource capacity. The Income Section is currently trialling implementation of an automated system. However, there is a risk that the bank reconciliations will not be automated by the go live date. Department for Work and	24/01/18	31/03/18	Revenues & Benefits Service Manager	Update 31/05/18 – Part of Income 2018/19 Improvement Plan. Universal Credit roll-out delayed until December 2018. Not our issue, but for Housing – transfer over payments, move from standing order to direct debit.

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		<p>Pensions (DWP) payments are also currently posted manually affecting promptness of DWP receipts (council tax and rents).</p> <p>There is a risk that rent arrears arises from delay in rents posted, placing pressure on recovery and possibly wasting Council resources. As a result of payments are not promptly posted, individual accounts will show inaccurate arrears due, possibly prompting recovery sequences, wasting Council resources and causing reputational damage to the Council.</p>				
Learning						
9	Council's Preparation for GDPR Compliance 171829	<p>8 The Learning Service is currently assisting its schools on preparations for GDPR by appointing a single Data Protection Officer to implement GDPR compliance.</p> <p>However, as at April 2018, a Data Protection is not yet in post and therefore, there is a risk that schools will not be fully GDPR compliant by 25 May 2018.</p>	27/11/17	30/06/18	Head of Learning	<p>The Learning Service has communicated with the Schools to ensure that the schools are aware of the new regulations and the implementation date. Each school will contribute towards the cost of appointing a single Data Protection Officer to ensure compliance in each school establishment and the Learning Service is at present assisting the schools to accomplish this aim.</p> <p>The Job Description is currently being evaluated.</p> <p>Update 03/09/18 – Post is currently being advertised.</p> <p>Currently undergoing a follow up review. Progress will be reported to the next Committee meeting.</p>
Transformation						
10	PCI DSS Compliance 066 2016/17	3.3 There is no process to assess and record the impact of change to ICT infrastructure on PCI DSS components.	21/09/16	30/04/18 changed	IT Service and Performance Management	This will be covered within the existing IT Change Management process whereby the customer procuring

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		There is a risk that any changes could compromise the security of cardholder data.		from 31/10/16	Service Manager	the new system must establish the PCI DSS implications. Will be subject to a follow up during October 2018.

Medium and Yellow Rated Internal Audit Recommendations Outstanding with target date up to 31/08/2018

Ref	Report	Recommendation	Date Raised	Agreed Target Date	Responsible Officer	Comments
Corporate						
11	Corporate Safeguarding Arrangements 053 2016/17	7 The Corporate Safeguarding Board should establish a programme of quality assurance activities to ensure policies and expectations are implemented effectively.	09/09/16	31/03/18 changed from 31/12/16	Assistant Chief Executive	First Follow Up 161753f1 – To be completed once Northgate System has been updated to provide a central database of DBS records and take-up of safeguarding training across all services. Scheduled for a second follow up, which will be reported to the December 2018 Committee meeting.
Resources						
12	Ethical Culture 067 2016/17	1.1.1b Contract monitoring arrangements for health and safety compliance are not reflected within the corporate and service Health & Safety Action Plans. There is a risk that contract monitoring arrangements will not be effectively implemented and contractors will not follow safe practice.	06/09/17	30/03/18 changed from 31/12/17	Corporate Procurement Manager	This will be addressed by ensuring that contract monitoring arrangements for H&S compliance are included within Contract Procurement guidelines. This will also be discussed with Heads of Service. Update 29/11/17 – This will be included in the Contract Management training in the new year.
13	Housing Benefit & Council Tax Reduction Scheme 092 2016/17	8 Although physical security to the section's information is recently improved, being a paper based system, information is vulnerable to being misplaced and there is a risk of lost information.	31/08/17	31/12/17	Housing Benefit Manager	Efforts to keep the filing up to date are in place. In relation to physical security, the control over access to the files and to the benefit room is secure and effective. The issue is in relation to documents and files being located. The Document Image System will eradicate this issue. Update 25/01/18 – Document imaging will improve this – delays in place due to Planning and IT. Scan and retrieve to be live by the end of February 2018. Back-

Ref	Report	Recommendation	Date Raised	Agreed Target Date	Responsible Officer	Comments
						<p>scanning done and is secure. Could be more back-scanning costs.</p> <p>Update 03/09/18 – Document Management System has now been implemented. All new post received is now scanned onto the Document Management System which minimizes the risk of paper being misplaced. We still have paper / files dating back to claims from October 2017 – July 2018 which need to be scanned onto the system. The aim is that work will commence on scanning these into the system during September 2018.</p>
14	Insurance Arrangements 074 2016/17	3.1.7 It should be ensured that insurance recharge premiums are raised promptly in accordance with the leasing agreement.	15/11/16	31/12/16	Revenues & Benefits Service Manager	Update 31/05/18 – Industrial Unit Rents – billed separately to the lease. Find the amount from the Insurance & Risk Manager – us to bill.
15	PCI DSS Compliance 066 2016/17	<p>2.1a Training is not currently formalised corporately and documented to officers who are responsible for processing card payments. In addition, there is no process to acknowledge the understanding of PCI DSS related policies with skills and competencies being reviewed as part of the appraisal process to ensure PCI DSS compliance.</p> <p>There is a risk that staff are unaware of requirements to protect cardholders' data resulting in a weak security of sensitive information.</p>	21/09/16	31/03/18 changed from 30/09/16	Revenues & Benefits Service Manager	<p>Training is informally provided to new staff however, this needs to be formalised and ensure the consistency of training provided corporately.</p> <p>The training provided will be formalised.</p> <p>Update 31/05/18 – Now being targeted under the PCI DSS Project Improvement Plan (which is still in draft).</p> <p>Will be subject to a follow up during October 2018.</p>

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16	Main Accounting 090 2016/17	1 The Income Officer is not promptly clearing the income suspense accounts. There is a risk that the Finance Service will not identify income collection promptly to ensure that the Council's accounts and balances are accurate and can be relied upon. The delay in identifying and clearing the income suspense account also has an impact on the timetable for completing other accounting work for verifying balances.	22/05/17	31/05/18 changed from 30/09/17	Revenues & Benefits Service Manager	Update 19/10/17 – New Income Officer has recently been appointed and this will be one of her priorities once she has been fully trained. Update 25/01/18 – A transaction code has been created for these payments (still awaiting a ledger code) and testing going on. Not complete. Update 31/05/18 – Still an issue. To be discussed early May.
17	Council's Preparation for General Data Protection Regulation (GDPR) 171801	1 Not all Heads of Services have identified and assessed GDPR compliance as a risk within their service risk registers. There is a risk that services do not assess what the impact of GDPR compliance will be on them, in addition to non-compliance. There is also a risk that services may not be prioritising actions to be implemented to demonstrate and be GDPR compliant by 25 May 2018.	27/11/17	28/02/18	Head of Resources	Heads of Services to assess their services' capacity to deal with the implementation work within the timescale after receiving tranche two and three of the work programme (after week 1 of January 2018) and to include in risk registers and Service Delivery Plans where appropriate. Update 25/01/18 – This has now been added to our Service Risk Register and we will looking to see what needs to be done following Corporate Information Manager's guidance.
18	Corporate Procurement Framework – Corporate Compliance 076 2016/17	1.1.1 The Contract Procedure Rules do refer to EU thresholds for tenders and the need to comply with EU treaty principles, but do not state what these thresholds are for the different types of works, or make any reference as to where the information can be found. There is a risk that users will not be aware of the relevant thresholds resulting in non-compliant procurement.	07/09/17	30/06/18 changed from 31/07/17	Corporate Procurement Manager	The levels are subject to regular review and should not be included in the CPRs as this document forms part of the Constitution and changes need to go through the Executive and Full Council. This would be too onerous. Suggest amendment to include a reference to the Procurement Handbook instead (Head of Council Business). The OJEU threshold will not be included in the CPRs as they change bi-annually and any changes to CPRs has to go through full council. There will be

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						a link from CPRs to handbook. (Corporate Procurement Manager). Currently undergoing second follow up. Progress will be reported to the next Committee meeting.
19	Corporate Procurement Framework – Corporate Compliance 076 2016/17	7.4.1 The Contract Procedure Rules do not include the requirement for a Sustainability Risk Assessment to be applied to all procurements above £25k, as directed in the Wales Procurement Policy Statement. There is a risk of sustainability not being taken into account in the procurement process resulting in the Council not adhering to its responsibilities as directed by the Welsh Government and not demonstrating compliance with the Well-being of Future Generations (Wales) Act 2015.	07/09/17	30/04/18 changed from 31/12/17	Corporate Procurement Manager	CPRs will be reviewed in November 2017 and submitted to Full Council in December 2017. The requirement for Sustainability Risk Assessments to be applied to all procurements above £25k will be included. Currently undergoing second follow up. Progress will be reported to the next Committee meeting.
20	Corporate Procurement Framework – Corporate Compliance 076 2016/17	7.4.2 The Council has no Sustainable Procurement Policy leading to a risk that sustainable development principles are not considered when setting and taking steps to meet “well-being objectives”. It was also found that sustainable procurement was not included in the Procurement Training programme which creates a risk of officers not aware of the requirement, resulting in non-compliant procurement and the Council failing to demonstrate compliance with the	07/09/17	30/06/18 changed from 31/12/17	Corporate Procurement Manager	A sustainable procurement policy has been drafted and has been presented to SLT with further work identified. Update 31/05/18 – Things have changed. Social Value Procurement Policy being created. Currently undergoing second follow up. Progress will be reported to the next Committee meeting.

Ref	Report	Recommendation	Date Raised	Agreed Target Date	Responsible Officer	Comments
		Wellbeing of Future Generations (Wales) Act 2015.				
21	Sundry Debtors 171804	<p>9 The Debtors Section is currently not able to accept direct debit payments due to a lack of resources, with the exception of Home Care debtors, where most pay by Direct Debit.</p> <p>The likelihood of prompt recovery is decreased and there is a risk of the debts not being recovered.</p>	22/11/17	30/04/18 changed from 31/01/18	Revenues & Benefits Service Manager	<p>The Council has since changed banks and the Section has requested a new service user number (SUN) from the bank. Tests will need to be undertaken on the 'bottom line' technology to ensure that the requests are cleared with BACS. Testing will also need to be done on the debtor system to allow the Income Team Leader to be able to set up the direct debit, import and export the file from the Debtors system to be released to 'bottom line' and authorised effectively. The Section has currently set up monthly meetings with Social Services to discuss how the Section plans to implement direct debits. As the debts from Home Care Clients are collected through the old service user number, the Section hopes that a bulk transfer of data can be done to operate under the new number. Testing will be undertaken within the Civica system to determine.</p> <p>Update 25/01/18 – In process of completing forms for bulk transfer of home care to the new SD originators SD. Resource issue.</p> <p>Update 31/05/18 – Need to be done after the year-end – must be done due to payment for school transport.</p> <p>Currently undergoing a follow up. Progress will be reported to the next Committee meeting.</p>

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Children's Services						
22	Child Care Court Orders under the PLO 044 2016/17	<p>5 The naming of documents on the electronic system is inconsistent and were not always found to be named in a meaningful manner. This may lead to documents not being recognised and potentially missed.</p> <p>There is a risk of insufficient evidence being provided, or duplicates being loaded onto the system.</p>	27/01/17	31/01/18 changed from 31/07/17	Safeguarding Service Manager	<p>First Follow Up 161744f1 – A new Service Manager for Quality Assurance has been in post since the original report was issued.</p> <p>Update 29/11/17 – Work has commenced to create recording guidelines “glossary of terms” with an intention to have consistency in recording and terminology.</p> <p>Update 02/05/18 – Practice Standards have been created in terms of recording information and a service audit has revealed that the quality of recording has improved. Further development work is in progress of the WCCIS system to include workflows and templates for documents being regularly used.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>
23	Child Care Court Orders under the PLO 044 2016/17	<p>7 Testing highlighted that not all officers have attended Information Governance training. It was also highlighted that there is no process in place to ensure that agency workers also attend Data Protection training before commencing with day-to-day activities with the Children Services.</p> <p>There is a risk that data protection legislation is not being adequately followed.</p>	27/01/17	31/01/18 changed from 31/03/17	Service Manager Corporate and Partnerships.	<p>First Follow Up 161744f1 – All officers to sign Information Governance and Data Protection declaration forms as part of the Service induction.</p> <p>Currently undergoing second follow up. Progress to be reported at the next Committee.</p>
24	Fostering Service – Recruitment and Retention 171820	3 Currently, the foster care recruitment and retention budget has been overspent for the last three years and there is no	24/05/18	30/06/18	Partnerships and Corporate	The budget will be reviewed as part of the service review that is currently being undertaken and will be monitored regularly for appropriateness.

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		<p>approved marketing plan/budget. The budget has not been reviewed to ensure it is appropriate, realistic and complete to ensure accurate budget monitoring.</p> <p>There is a risk that the Service will continue to overspend its budget and the number of foster carers and placement options will continue to fall, ultimately leading to higher costs for the Council.</p>			Service Manager	
Learning						
25	Business Continuity Follow Up 081 2016/17	1.3 Services should ensure that Business Continuity and Emergency Planning arrangements are up to date and operational; the Service Delivery Plans should contain Business Continuity and Emergency Planning arrangements.	17/01/17	01/04/17 changed from 31/12/15	Head of Learning	<p>Re-iterated from Business Continuity Management 007 2015/16</p> <p>An audit is scheduled as part of the 2018/19 Annual Internal Audit Plan.</p>
26	School Transport 171805	<p>3.1 There are no processes in place to allow the Transport Section to verify with the Learning Service whether a child no longer requires a transport service. The Transport Section relies on the contractor to inform the Council of any changes.</p> <p>There is a risk that the Council is not notified or promptly notified. In addition, there is a risk that the Council will not be able to verify children present on each journey to and from educational establishments to inform the parents if an incident were to occur.</p>	06/09/17	30/06/18 changed from 31/03/18	Head of Learning	<p>The Learning Service will implement a Transport one module. The module will identify the pupils that should be on each transport service provided by the Council. The system will also be used to review pupils' receiving taxi services on an annual basis.</p> <p>Update 23/09/17 – Until the One Transport module is established, the education will review pupil taxi lists with the transport department termly.</p> <p>An officer within the Learning Service will undertake the task of termly reviews of taxi service need, in conjunction with school head teachers, Social Services and others.</p>

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						<p>First Follow Up 171805f1 – Until the ONE module is active, interim arrangements are in place for taxi services transporting pupils to and from schools. The Transport Section maintains information relating to bus contracts. We were informed that identifying pupils on each bus contract will be implemented on the operation of the Transport One module. Following collation of up to date data, the Education Department will verify with each school and unit each term in order to ensure any changes are highlighted regarding learner provision with a 'sign off' from each school. The schools have identified a lead person who will be responsible for monitoring the situation.</p> <p>Each school's lead person has also been asked by Education Department to inform Learning immediately when provision is not required, informing the council Departments and individual taxi companies.</p> <p>Data collation during the Autumn term 2017 by the Education Department has verified which children are present on each taxi journey to and from Educational establishments – this a requirement to ensure safeguarding and health and safety responsibilities are met.</p> <p>Update 30/08/18 – Since November 2017, a process has been established between Education and Transport Section whereby all applications for transport are received by an identified officer in the Education Department via a specific application form issued by Education (which includes parents' details in case of emergency). The application is considered against the present policy and, if authorised, the form</p>

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						is then sent to an identified officer in the Transport Section. Once Transport has processed the application, contract details are shared with Education (i.e. contract number / operator) and is added into Transport ONE. When a contract needs to be terminated, this is done via a specific form (again issued by Education) which is shared with Education / Transport. Additionally, all contract details are shared with relevant schools on a termly basis by Education as an extra monitoring measure.
Transformation						
27	PCI DSS Compliance 066 2016/17	<p>3.6 Network scans are not undertaken on a quarterly basis by an approved scanning vendor in accordance with PCI Security Standards Council PCI Quick Reference Guide 11.2.</p> <p>There is a risk that network vulnerabilities will compromise the security of data.</p>	21/09/16	30/04/18 changed from 30/09/16	IT Service and Performance Management Service Manager	<p>PSN network scans are currently undertaken annually by an external provider.</p> <p>Cardholder data is not held on the Council's infrastructure. IT to seek assurance from the software supplier that if they do keep the data temporarily that they are compliant to PCI DSS.</p> <p>Responsibility of Business Systems Integration Manager as well as Service Manager.</p> <p>Will be subject to a follow up during October 2018.</p>
Council Business						
28	Council's Preparedness for General Data Protection Regulation (GDPR) 171801	<p>1 Not all Heads of Services have identified and assessed GDPR compliance as a risk within their service risk registers.</p> <p>There is a risk that services do not assess what the impact of GDPR compliance will be on them, in addition to non-compliance.</p> <p>There is also a risk that services may not be</p>	27/11/17	28/02/18	Head of Council Business	Heads of Services to assess their services' capacity to deal with the implementation work within the timescale after receiving tranche two and three of the work programme (after week 1 of January 2018) and to include in risk registers and Service Delivery Plans where appropriate.

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		prioritising actions to be implemented to demonstrate and be GDPR compliant by 25 May 2018.				Currently being followed up. Progress will be reported to the December 2018 Committee meeting.
Regulation and Economic Development						
29	Building Regulation Fees – Inspection & Enforcement 061 2016/17	<p>1.1 Informal procedures exist for dealing with Building Regulations fee income; the procedures are not dated and do not record the version or the date the next review is due.</p> <p>The absence of formal guidance documentation, subject to regular formal review, could increase the risk of non-compliance with expected practices, including control procedures, possibly leading to errors in processing, financial loss and / or reputational damage.</p>	12/08/16	31/12/17 changed from 31/12/16	Team Leader Building Control	<p>No procedures in place at all which is against codes contained within Building Control Performance Standards July 2014.</p> <p>Only one Admin team member inadequate cover when on annual leave or sick leave which results in a backlog of work and income standing still.</p> <p>Second Follow Up 151661f2 – The Team Leader Building Control explained the informal procedures are currently in place and that a formal refund policy has been drafted to date. It was agreed that the fees collection procedures will be included within the refund policy in due course and reviewed by senior management for approval to ensure that complete procedures are fully documented.</p> <p>Update 22/12/17 – Building Control Refund Procedure Document has been prepared. Does not include the treatment of income.</p>
30	Building Regulation Fees – Inspection & Enforcement 061 2016/17	<p>2.8 No formal declaration of interest forms have been completed within the section; assurances were received that officers would not be assigned/allocated work within their home area.</p> <p>Failure by officers to formally declare any personal interest / declare any hospitality or</p>	12/08/16	30/11/17 changed from 31/12/16	Team Leader Building Control	<p>Update 29/03/17 – An electronic form is available for use and staff have been reminded of the Officer's Code of Conduct.</p> <p>Second Follow Up 151661f2 – Staff have yet to complete the declaration forms. The Team Leader Building Control suggested that where necessary, a declaration form should be completed for every</p>

Ref	Report	Recommendation	Date Raised	Agreed Target Date	Responsible Officer	Comments
		gifts offered to or received by them could undermine the integrity of the service.				Building Regulation application submitted to ensure this process is complete and accurate.
Schools						
31	Ysgol Gynradd Bodedern 029 2015/16	5.6.1 The Governing Body Institution should formally appoint the auditor of the School Fund and this should be documented in the minutes of the meeting.	29/02/16	31/10/16	Head Teacher	No update received.
32	Ysgol Gynradd Bodedern 029 2015/16	5.7.1 The school should register with the Information Commissioner in accordance with the Data Protection Act 1988.	29/02/16	31/03/16	Head Teacher	No update received.
33	Ysgol Talwrn 030 2015/16	4.6.1 A risk assessment should be undertaken to identify risks associated with responding to the security alarm.	15/03/16	31/03/16	Head Teacher	No update received.
34	Ysgol Llanfair PG 057 2016/17	4.5.1 Driver records should be updated annually and every member of staff required to complete a form – Declaration for Drivers of Council or Private vehicles.	15/06/16	30/06/16	Head Teacher	No update received.