

South Northamptonshire Council

Recommendation Status Update Report for Audit Committee

July 2020



cw audit
internal audit services

1.Implementation of agreed actions

Recommendations arising from finalised Internal Audit reports are uploaded to a web-based tracking database. Recommendation owners can access the system to provide status updates, revise implementation dates or mark recommendations as implemented once agreed action has been taken.

This table below provides a status summary for all recommendations raised from the 2017/18 year onwards that were originally due for implementation by 30th June 2020.

Summary	1 Critical	2 High	3 Medium	4 Low	Total
Due for implementation by 30th June 2020	0	16	53	14	83
Implemented	0	11	46	13	70
Outstanding	0	5	7	1	13

Further analysis of the 13 recommendations that remain outstanding is summarised in the following table, which is further supported by details of these recommendations included in Appendix A.

Summary	1 Critical	2 High	3 Medium	4 Low	Total
Total	0	5	7	1	13
Original date exceeded, no deferral	0	0	0	0	0
Deferred date exceeded	0	0	0	0	0
Deferred date beyond 30 th June 2020	0	5	7	1	13

Appendix A

Reference	Recommendation	Risk ranking	Original response	Original target date	Revised target date	Current status	Owner
Level 2 Recommendations							
Homelessness / Personal Action Plan	In all relevant cases a Personal Housing Plan should be completed, agreed and signed by the client.	2	This issue has been raised at team meetings highlighting the importance and legal requirement for each customer to have an agreed PHP. The necessity for PHPs and how they can be developed will form part of the training session in March. This issue also relates to training on both the Homelessness Reduction Act and the functionality of the Jigsaw system, as well as case file reviews.	30/6/20	01/09/20	June 2020 update: Case reviews and 1-1 are embedded within the team where any issues / inconsistent approaches are highlighted and, are dealt with. Two staff training sessions scheduled for March/ May 2020 were cancelled due to COVID 19 but it is hoped that a "socially distanced" training session can take place at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager
Homelessness / Decision Letters	Officers should ensure that the correct decision letters are sent out as required and necessary determinations made within the relevant timescales.	2	This issue is related to training on both the Homelessness Reduction Act and the functionality of the Jigsaw system, as well as case file reviews.	30/06/20	01/09/20	June 2020 update: Case reviews and 1-1 are embedded within the team where any issues / inconsistent approaches are highlighted and, are dealt with. Two staff training sessions scheduled for March / May 2020 were cancelled due to COVID 19 but it is hoped that a "socially distanced" training session can be held at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager
Homelessness / Staff Training	Staff need further training on the operation of Jigsaw, and legislative requirements to ensure compliance with the Homelessness Reduction Act.	2	Training for the team is being set up. This training will include a number of different elements: Housing Reduction Act training ; delivering the Housing Reduction Act through the Jigsaw system ; motivational interview training & case file review training. In addition to formal training, the Senior Housing Options Officer and the Housing Team Leader will identify internal training needs following outcomes of case file reviews and through regular 1-1 with team members.	30/06/20	01/09/20	June 2020 update: Case reviews and 1-1 are embedded within the team where any issues / inconsistent approaches are highlighted and, dealt with. Two staff training sessions originally scheduled for March /May 2020 were cancelled due to COVID 19 but it is hoped to have a "socially distanced " training session at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager

<i>Reference</i>	<i>Recommendation</i>	<i>Risk ranking</i>	<i>Original response</i>	<i>Original target date</i>	<i>Revised target date</i>	<i>Current status</i>	<i>Owner</i>
GDPR / Consultant Review of GDPR	Ensure the GDPR action plan and project plan produced by external consultants are used to drive forward implementation of GDPR, with progress recorded and subject to regular review.	2	Creating a new integrated work plan including the consultant report and other findings.	07/12/18	31/03/21	April 2020 update: Business Support Officer started work with this project 02/03/2020 , however revised working arrangements as a result of COVID 19 is making progress slow. June 2020 update: No change from April 2020 update. COVID 19 has made progress slow.	Louise Aston, Information Governance Manager
GDPR / Data Sharing Policy & Agreements	Complete the Data Flow Mapping process and then produce a Data Sharing Policy. The Councils need to ensure that there are Information Sharing Agreements in place with all third parties that the Councils share personal data with and that these agreements are compliant. This will need the legal team to be involved and potentially additional legal support.	2	We are logging the sharing policies and agreements. We still have to confirm that we our agreements are comprehensive for all areas where data is shared. Ongoing project, complications due to the amount of data sharing with Unitary, CDC/SNC and CDC/OCC.	31/03/19	31/03/21	April 2020 update: Ongoing - next schedule 1 to be sent to MO's for signing off is Revs & Bens one due imminently. June 2020 update: Schedule 1's ongoing as linked into LGR work which is continuing until 31/03/2021.	Louise Aston, Information Governance Manager

Reference	Recommendation	Risk ranking	Original response	Original target date	Revised target date	Current status	Owner
Level 3 Recommendations							
Homelessness / Accuracy Of Information	Ensure that staff are trained to correctly identify the nature of the applicant's household.	3	This particular case was addressed with the individual officer in their 1:1. The issues raised as part of the audit have highlighted the need for further training. The training will include a number of different elements: Housing Reduction Act training; delivering the Housing Reduction Act through the Jigsaw system; motivational interview training and case file review training. In addition to formal training, the Senior Housing Options Officer and the Housing Team Leader will identify internal training needs following outcomes of case file reviews and through regular 1-1 with team members.	31.03.20	01.09.20	June 2020 update: Two previous training sessions arranged for March / May 2020 have had to be cancelled due to COVID 19. These have not yet been rearranged but it is hoped that a "social distanced" training session can take place at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager
Homelessness / Clear documentation & decision	Cases should be clearly documented and decision letters produced. Where an applicant has a local connection to another council, a referral to the relevant council should be made.	3	This case was addressed with the individual officer in their 1:1. The team have been made aware that appropriate case administration is essential. The importance of robust documentation is key to ensure appropriate decisions and referrals are made in a timely manner. This issue also relates to training and case file reviews.	30.06.20	01.09.20	June 2020 update: Case reviews and 1-1 are embedded within the team where any issues / inconsistencies are highlighted. Two staff training sessions previously arranged for March/May 2020 were cancelled due to COVID 19 but is hoped that a "socially distanced" training session can take place at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager
Homelessness / Relief Duty	Ensure that correct determinations are made to ensure appropriate relief is given to homeless applicants.	3	This was addressed with the individual officer in their 1:1. This issue is related to training on both the Homelessness Reduction Act and the functionality of the Jigsaw system. The response to this relates to training and case file reviews.	30.06.20	01.09.20	June 2020 update: Case reviews and 1-1 are embedded within the team where any issues / inconsistent approaches are highlighted and, are dealt with. Two staff training sessions arranged for March/May 2020 were cancelled due to Covid 19 but is hoped that a "socially distanced" training session can be held at The Forum before September 2020.	Jacqueline Brooks, Housing Services Manager

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GDPR / Monitoring & Reporting	When the data mapping process has been completed, a process should be established to undertake periodic checks on records security. Regular reporting should be undertaken on outcomes of records security checks and compliance monitoring to provide strategic oversight to those with overall responsibility for records management.	3	This will be done as part of the DPO audit process.	31/08/19	31/03/21	April 2020 update: This is now being covered by LGR Information Governance workstream work to bring together data flow maps for existing councils into a new process for LGR. June 2020 update: no change to April 2020 update apart from revised implementation date of 31/03/2021.	Louise Aston, Information Governance Manager
GDPR / Information Asset Register	Complete the production of a comprehensive Information Asset Register and ensure it covers all key systems used across the Council.	3	This will be part of the new integrated work plan.	31/08/19	31/03/21	April 2020 update: This is now being covered by LGR Information Governance work to bring together information asset data for existing Councils into a new IG environment for LGR. June 2020 update: no change to April 2020 update except revised implementation date of 31/03/2021.	Louise Aston, Information Governance Manager
GDPR / Breach Reporting	Consider making available some interactive verification for higher risk staff to ensure that there is understanding and buy in from them and that they understand what a data breach is and what is a reportable incident.	3	Further focussed training will be delivered to high risk teams.	30/09/19	31/08/20	April 20 update: Training being developed and will be delivered by 30/06/2020. June2020 update: No change to April 2020 update apart from revised implementation date of 31/08/2020.	Louise Aston, Information Governance Manager
GDPR / Data Sharing Procedures	The Council should produce procedures and guidance to all staff that clearly set out when it is appropriate to share or disclose data.	3	We will produce written procedures and guidance notes on data sharing.	28/02/19	31/03/21	April 2020 Update: This is now being covered by LGR Information Governance workstream to bring together data sharing for existing councils to enabling sharing for LGR. June 2020 Update: As per April will only be concluded by LGR Information Governance workstream finishing.	Louise Aston, Information Governance Manager

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<i>Level 4 Recommendations</i>							
GDPR / Personal Data	The Council should confirm that all departments have ensured that there is a legitimate purpose for using personal data prior to collecting it.	4	This will be part of the new integrated work plan.	31/08/19	31/08/20	April 2020 update: SMT have approved Data Retention Policy, however revised working arrangements as a result of COVID 19 is making progress slow. June 2020 update: no change from April 2020 update - COVID 19 made progress on this stop for a period of time, this is now being picked back up. Revised implementation date.	