

Appendix 1 Overdue Audit Actions @ 08/11/22

Review Area	Action Priority Level	Report's Audit Opinion	Agreed Action	Implementation Deadline	Last Update	Update provided by Service	Months Late
Data Protection and Information Management 15.16	Amber	Limited	The Senior Information Risk Officer (SIRO) shall decide how long information and emails etc shall be kept within Anite, and the process for purging or archiving.	30/09/2016	08/11/2022	Having reviewed technical opportunities, they do not meet the needs we have. We are investing in technical support to guide managers in developing treatment plans for their information holdings, and to develop plans and business cases to support this activity into the future. This will be undertaken during the year 22/23.	74

PCI DSS 18.19 /
3

Amber

Adequate

A training needs assessment should be performed for all members of staff that have responsibility for PCI DSS compliance activities so as to determine their training needs.

01/04/2020

07/11/2022

HDC's approach has been to mitigate our noncompliance by taking training actions, and deploying software which blocks the recording of card details. However, these are mitigations while we work towards full compliance, they do not make us PCI complaint.

Any staff member who takes payments are trained as part of being given access to Capita. However, for HDC to be PCI complaint we either have to:

- Stop customer card details entering our network (including being spoken to advisors even when calls are not recorded) via technical solutions and integrations
- Create a separate accredited network where staff can take card details (thought to be undesirable)
- Allow card details to enter our network but make the whole 3C network PCI compliant (considered impractical \ staff resource heavy and costly)

HDC is operating some payment systems like Gladstone (for Leisure) which require the customer to speak their card details to a Leisure agent while they are input into a chip and pin machine run in a 'card holder not present mode'. Integrating Gladstone into an IMS would be one option.

So HDC's current position is we are working

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with outside specialists from the NCC Group alongside City and SCDC to document every route to full compliance and then decide on the appropriate one. The implications of doing nothing will also be specified.

The Capita IMS contract is coming to an end next year, so PCI compliance is being considered alongside the tender for a new IMS. One option from NCC report could be including PCI compliance measures for all systems in the new IMS tender.

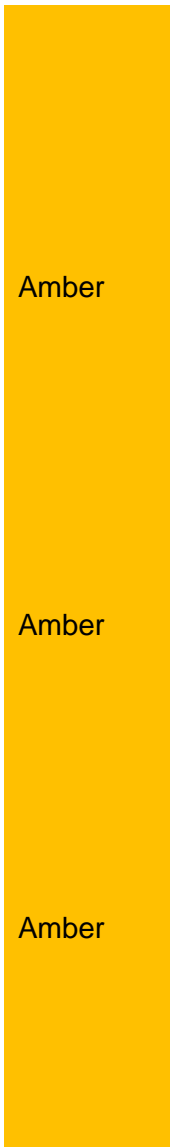
I was told by Claire Edwards that HDC is paying a monthly fee due to the fact we are not compliant, but I don't think this indemnifies us against anything. If there was a payment breach, HDC could still be fined and face an investigation from our bank (as well as reputational damage). The ultimate sanction would be the withdrawal of our ability to take payments if we failed to take the remedial action demanded by the bank. The NCC report will cover these risks.

PCI DSS 18.19 / 4	Amber	Adequate	Compliance should be monitored and action taken when members of staff are found to have not completed the PCI DSS training or have not read the policy and procedures.	01/04/2020	07/11/2022	<i>As per update provided for PCI above</i>	32
PCI DSS 18.19 / 5	Amber	Adequate	<p>Actions need to be drawn together in a policy which sets out how the council will manage PCA DSS compliance activities and the policy should be reviewed on a regular basis. this should include but not be limited to:</p> <ul style="list-style-type: none"> - Assignment of roles and responsibilities for ensuring that the Council is PCS DSS compliant - Procures for staff that are responsible for taking card payments - The Council's security strategy in relation to the storage, processing and transmission of credit card data - A set of instructions for detecting, responding to the storage, processing and transmission of credit card data. 	01/04/20	07/11/22	<i>As per update provided for PCI above</i>	32

Purchase Order Compliance 2019.20 / 2	Amber	Limited	Further investigation will be taken to find out whether the system can be improved by showing the approver the remaining budget at the time of approving a requisition. This will enforce informed commitment making and remove existing blind approvals.	30/06/2021	01/11/2022	To be released in November subject to satisfactory testing which has not been completed yet due to other pressures	16
Land Charges 18.19 / 3	Amber	Limited	Written procedures should be in place to support how the costs and calculation process is carried out.	30/06/2021	06/10/2022	FBP to contact other LAs for information of their operating model	16
Purchase Order Compliance 2019.20 / 5	Amber	Limited	Written procedures on the PO process will be written and issued to users. Users will be educated and refreshed on certain areas not being performed correctly and causing delays or inefficiencies in the process e.g. current issue of failure to receipt, inappropriate use of retrospective ordering. Guidance will give specific reference to use of retrospective ordering; correct VAT codes; use of the delegation functionality to avoid delays; etc. Guidance should be posted to the 'Popular' section of the Intranet for quick access for users.	30/09/2021	10/10/2022	Action not yet closed as there are some PO notes that still need to be reviewed	13

Main Accounting System 2020.21 / 3	Amber	Adequate	The Payroll reconciliation will be remapped / worked up for the new HR / Payroll system. Instructions will be documented and the routine task handed over to the Payroll team for actioning.	30/09/2021	21/09/2022	Payroll Manager currently waiting on Finance to provide monthly details from Tech One to reconcile against.	13
Budgets and MTFS 2020.21 / 1	Amber	Adequate	<p>Management should perform a training needs analyses to identify and assess the level and type of training required by members of staff and Members with regards to the MTFS and the use of the budget module, which should also identify any training needs for Members.</p> <p>A mandatory training programme should be put in place that is based upon the requirements of the training needs analysis.</p> <p>Training completion should be recorded and monitored and training records should be maintained for audit purposes.</p>	31/12/2021	06/10/2022	FBPs work closely with the BMs on their budgets and forecasts and provide the requisite training. Detailed guidance notes are also available online. these will be reviewed and updated by 31 March 2023	10
Main Accounting System 2020.21 / 4	Amber	Adequate	Debtors reconciliation issues will be investigated and resolved. The process for the reconciliation going forward will be documented and responsibility handed over to the Exchequer Officer.	31/03/2022	06/10/2022		7

Small Works Contract 21.22 / 1	Amber	Limited	A dedicated small works contract or framework agreement will be tendered and formalised for use across the authority.	30/04/2022	01/11/2022	Project slippage due to current workloads. This is still in the pipeline and will be picked up as soon as possible. Ideally an ITT will go out for contract prior to 2023.	6
Small Works Contract 21.22 / 2	Amber	Limited	Staff responsible for procurement will be made aware of the contract, its use mandated, and details of pricing / rates and staff responsibility will be communicated.	31/05/2022	01/11/2022	As previous update - due to commence ITT prior to 2023.	5
Inventory of IT Assets 2021.22 / 5	Amber	Limited	Review the inventory to locate gaps in the asset number sequence and create entries to explain the reasons for these gaps.	29/07/2022	03/11/2022	Email sent to Support team to ensure numbers are sequential and process if not.	3
Compliance with the Code of Transparency 2021.22 / 1	Amber	Limited	Review the formal process document which outlines responsibilities for each data set including who is responsible for updating the data, what information needs to be included and the frequency of upload. If this document no longer exist/cannot be ocated, a new document should be created to capture this information.	30/07/2022	08/11/2022	The requirements of the code of transparency whilst important are slightly arbitrary and span several aspects of the organisation. Whilst creating a new policy to pick up these requirements that span from HR to waste management is the simple option, it generates yet another report that needs to be reviewed and updated. Instead we are building these activities into service plans and service documents to ensure that they remain updated over time, alongside other more service derived data.	3



[This was originally created under Action 1054 during the 2015/16 audit of the Transparency Code.]

Compliance with the Code of Transparency 2021.22 / 2	Amber	Limited	Appoint an 'owner' of the Transparency Code, so that they can be a point of contact, held accountable for the information uploaded and ensure HDC remain compliant with the code. This owner should ensure that the process outlined is adhered too by other services who hold the data.	30/07/2022	08/11/2022	The ownership of the code has been assigned to the SIRO, in the current form of Oliver Morley.	3
Compliance with the Code of Transparency 2021.22 / 3	Amber	Limited	Review the information that is currently held on HDC's website in relation to the Transparency Code. Any data which is out of date should be removed and any links mentioned relevant.	30/07/2022	08/11/2022	Progress made - All HR data updated and added to website, waste data updated. Just need to finalize finance, and procurement data to complete. Anticipate this being made part of standard reporting regimes. https://www.huntingdonshire.gov.uk/council-democracy/council-open-data-and-information/	3
Overtime 21.22 Action 2	Amber	Adequate	At least six-monthly reports will be generated by Payroll, and HR will review and identify any overtime "anomalies" and liaise with Service Managers to better understand / address issues or concerns.	31/07/2022	07/11/2022	Half the report has been actioned i.e managers contacted the other half needs completing but we will be one HRBP down by Wednesday so wanted to extend deadline until end of December. The plan is to get the other half completed and on to SLT meeting.	3

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