

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

**APPENDIX 1**

	Manager Responsible	Head of Service Position Statement		Responsible Financial Officer		
		Reason for Delay	Revised Implementation Date	RFO Opinion on Impact on Control/Financial Framework	Going Forward Action	
<b>HEAD OF 3C's ICT</b>						
<b>AUDIT</b>	<b>CYBER SECURITY</b>					
<b>Agreed Action (1)</b>	Management should implement a defined information security incident management procedure, which includes but is not limited to: - The definition of what constitutes an incident - The procedure for reporting an information security incident - The procedure for logging incidents - The procedure for investigating and categorising an incident - The arrangements for post-incident management. The procedure should be communicated to all members of staff across the three Councils.	Network Infrastructure Manager	An interim Information Security Management Policy is in place and in use which meets the requirement. However, currently being developed is a centralised IT Policy system that will formalise this interim procedure for all three partners.	No change.	RFO comments as at 04/01/2018:  The interim policy is in place and is operating effectively.  However, its formalisation is awaiting the new Policy System. Therefore it is fair to conclude that this audit action is "In-part" Implemented. Having spoken to the Head of 3C's ICT, the full system will be in place 31 <sup>st</sup> March 2018.  RFO comments as at 30/04/2017.  Cyber security attracts very high importance; the relatively tight revised	"In-part" implemented with full implementation by the 31 <sup>st</sup> March 2018.

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	Furthermore, information security incidents should be reviewed on a routine basis.					implementation deadline demonstrates management's priority in implementing this action.	
<b>Implementation Date</b>	30/06/2017					Original implementation date : 30/01/2017	
<b>Agreed Action Status</b>	Red					No further extensions to be granted.	
<b>AUDIT</b>	<b>CYBER SECURITY</b>						
<b>Agreed Action (4)</b>	Management should establish an Information Asset Register, which records the following information about the Council's information assets: - The nature of the information asset and the reason for its collection - The owner of the	Information Governance Manager	The development of an Info Asset Register is an integral part of the General Data Protection Regulations (GDPR) and has been	31 <sup>st</sup> May 2018.	RFO comments as at 04/01/2018:  With the statutory requirement to complete the GDPR review, it was more pragmatic to incorporate this recommendation into the GDPR review.  It is essential to have in place	RFO agrees to an extension to 31 <sup>st</sup> May 2018.  No further extensions.	

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	information asset - The “at rest” location of the information asset - The expected controls in place to secure the information asset.		ongoing since July 2017 and will be implemented in time for the regulations.  A GDPR readiness check has also been undertaken.		a robust Asset Register, this work will complete this requirement.  Original implementation date: 31/05/2017.	
<b>Implementation Date</b>	31/05/2017					
<b>Agreed Action Status</b>	Amber					
<b>AUDIT</b>	<b>E-PAYMENTS</b>					
<b>Agreed Action (1)</b>	The Council should complete a Payment Card Industry (PCI) Data Security Standard (DSS) Self-assessment questionnaire and submit the findings to the Council’s acquirer or payment brand/bank.	Information Governance Manager	A comprehensive Gap Analysis has been completed and work is underway to implement the changes needed to achieve	No change	RFO comments as at 04/01/2018:  Having spoken to the Head of 3C’s ICT, this is a significant project covering all three partner Councils. It will require a thorough review of all payment channels and is strictly not an ICT issue (although 3C’s ICT have taken	This Audit Action to be removed from the Audit Action database. This is a significant project and not just for HDC.  Compliance should be monitored via the Councils Project Management
<b>Implementation Date</b>	30/06/2017					

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

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<b>Agreed Action Status</b>	Red		<p>compliance across all three partners.</p> <p>A risk based approach is being taken, initially tackling the payment channels that have the highest volumes in terms of transactions.</p>		<p>on the body of work).</p> <p>I recommend this Audit Action is removed from the database and the service requirement is met via the establishment of it as a specific project that is overseen by the Project Management Governance Board.</p> <p>RFO comments as at 30/04/2017.</p> <p>The report element of this audit action must be completed by the revised deadline. Subsequent actions will require further implementation – but this work will constitute a work programme within the 3C's ICT shared services.</p>	Governance Board.

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

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					Original implementation date : 31/03/2015.  No further extensions to be granted.	
<b>AUDIT</b>	<b>IT DISASTER RECOVERY</b>					
<b>Agreed Action (3)</b>	Management should produce technical recovery plans for all IT infrastructure, hardware and systems that are necessary to provide an IT service to the Council in the event of a disaster. These technical actions plans should be appended to the IT Disaster Recovery Plan and made available in the event of a disaster.	Network & Infrastructure Officer	The IT Disaster Recovery project will follow the Server Room consolidation, this is expected to be completed in February 2018 (there was no point developing a new IT DR until the server	30 <sup>th</sup> April 2018	RFO comments as at 04/01/2018:  It would have been a waste of resources to produce an IT Disaster Recovery plan etc prior to the Server Room consolidation. As noted in the 'Reason for Delay', the consolidation is expected to be completed by the end of February with all supporting documentation, including the IT Disaster Recovery Plan being completed by the end	The IT Disaster Recovery Plan to be completed by the 30 <sup>th</sup> April 2018.  No further extensions.
<b>Implementation Date</b>	30/09/2017					

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

**APPENDIX 1**

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<b>Agreed Action Status</b>	Amber		room consolidation was completed)		of April.  Original implementation date : 30/06/2017.	
<b>AUDIT</b>	<b>FREEDOM OF INFORMATION</b>					
<b>Agreed Action (2)</b>	The existing FOI e-learning course(s) will be revisited and compared to any other similar course available through County. The agreed e-learning course should be advertised, encouraged and take-up monitored	Information Governance Manager	A new "eLearning" module is currently being procured which will include FOI.  The new eLearning module will be a comprehensive tool that will cover a number of different training areas.	31 <sup>st</sup> March 2018.	RFO comments as at 04/01/2017: Technically no extension can be allowed. However, because the FOI training is part of an overall eLearning suite it has been more cost effective to procure as one product.  The loss of control is limited, the Council has a relatively strong centralised FOI service.  RFO comments as at 30/04/2017.	The new eLearning suite will be in place by the 31 <sup>st</sup> March 2018.
<b>Implementation Date</b>	31/08/2017					
<b>Agreed Action Status</b>	Amber					

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

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			Because of the need to ensure that the various modules will be compliant with the training needed, the procurement has taken a little longer than expected.		<p>The risk to the control / finance framework should be mitigated if the revised date is achieved.</p> <p>Manager comments at 30/04/17 were that 'e-learning portals will not be re-established until July 2017 therefore it is not possible to review courses until this date.</p> <p>Original implementation date : 31/03/2015.</p> <p>No further extensions.</p>	
<b>6</b>	<b>COMPLIANCE WITH THE TRANSPARENCY CODE</b>					
<b>Agreed Action (6)</b>	Training/guidance will be given to all responsible officers who prepare data	Information Governance Manager	Formerly this audit action was assigned	31 <sup>st</sup> January 2018	RFO comments as at 04/01/2018:	Full implementation by 31 <sup>st</sup> January 2018.

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

**APPENDIX 1**

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	to ensure they are aware of their responsibilities and what is required from them e.g. data protection and redacting information; caveats data amendments; on-line publication/filing rules (formats and names) metadata etc.)		to a different service, but as of December 2017 it was agreed to be reassigned to 3C's ICT.		Strictly speaking no further extension should be granted. However, with the reassignment of the audit action and the fact that 3C's ICT have committed to complete by the end of January 2018, this is a pragmatic solution.	
<b>Implementation Date</b>	Amber		New training/guidance notes are currently being developed and will be implemented by the end of January 2018.		RFO comments as at 30/04/2017.	
<b>Agreed Action Status</b>	31/10/2017				The correct use of data is every member and officers responsible; however, job descriptions etc should identify where there are specific responsibilities. The issuing of up to date training/guidance should be an ongoing process by management so it can gain confidence that staff are	



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					<p>meeting their responsibilities.</p> <p>With the issuing of this latest guidance, although late, will meet this requirement. On balance, there is considered limited risk to the control/financial framework.</p> <p>Original implementation date: 31/03/2016.</p> <p>No further extensions.</p>	
<b>AUDIT</b>	<b>DATA PROTECTION &amp; INFORMATION MANAGEMENT</b>					
<b>Agreed Action (10)</b>	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.	Corporate Team Manager.	The Anite retention module is being tested within the Benefits Service.	31 <sup>st</sup> March 2018	RFO comments as at 04/01/2018:  This action has only just been reassigned to the Corporate Team Manager. It is fair to give the officer an opportunity to implement so	Corporate Team Manager to implement by the revised deadline (31 <sup>st</sup> March 2018).
<b>Implementation</b>	30/06/2017					

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

**APPENDIX 1**

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<b>Date</b>						
<b>Agreed Action Status</b>	Amber		The Corporate Team Manager inherited this action on becoming SIRO in Jan 2018. He has not been able to evaluate the issue or provide a revised implementation date.		an extension until 31 <sup>st</sup> March 2018 is granted.  No further extensions.  Original implementation date : 30/09/2016.	
<b>HEAD OF COMMUNITY SERVICES</b>						
<b>AUDIT</b>	<b>LICENSING</b>					
<b>Agreed Action (2)</b>	A fundamental review of the fees and charges for Hackney Carriage Licences should be undertaken to ensure that they are reasonable and proportionate to the costs	Licensing Manager	A robust spreadsheet has been completed, however it has identified that the recharges	31 <sup>st</sup> March 2018	RFO comments as at 04/01/2018:  No extension is 'formally' granted but the calculation of these costs has to be forensically correct. Finance	Finance Manager supplies required numbers by the 28 <sup>th</sup> February 2018.  Licensing Manager to implement by the 31 <sup>st</sup>

**OUTSTANDING INTERNAL AUDIT ACTIONS AS AT 30 NOVEMBER 2017**

**APPENDIX 1**

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	incurred for the licensing regime. Furthermore, the accounting records for all income and expenditure should be transparent. Evidence should be maintained to support the review and that the appropriate approval has been obtained.		are still incomplete as they do not cover Councillor and officer costs associated with any committee work undertaken. These figures have been requested and are currently awaited. The review will be completed once the figures have been received.		are currently working on a new apportionment approach for democratic costs and have committed to complete this by the 28 <sup>th</sup> February 2018. This then will give Community Services a month to complete by the end of March 2018.  Original implementation date: 31/12/2016.	March 2018.
<b>Implementation Date</b>	30/09/2017					
<b>Agreed Action Status</b>	Red					