



***Internal Audit Report  
Review of Prior Year  
Recommendations***

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March 2017  
Final version

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# 1 Introduction

This internal audit was completed in accordance with the approved annual Internal Audit Plan for 2016/17.

This report summarises the findings arising from a review of the progress made by the Council in implementing the prior year internal audit recommendations.

## 1.1 Objectives and Scope

The scope of this audit was to review the progress made by the Council in implementing prior year internal audit recommendations.

The agreed audit objective was therefore to confirm that the internal audit recommendations have been implemented.

## 1.2 Background

The Council is committed to ensuring that key risks are identified and addressed as far as possible, the system of internal control is adequate and operating effectively and the policies and procedures in place are up to date and being followed.

As Internal Audit reports and findings identify possible risk areas, an important part of the internal audit service is to review the progress made in addressing prior year recommendations.

In 2016/17, we reviewed the following audit areas as part of our Internal Audit schedule:

Audit Area	Number of recommendations			Total
	Priority 1	Priority 2	Priority 3	
Invoicing & Debtor Management	2	5	3	10
Cash Handling - CLC	-	1	4	5
Cash Handling - Ballyreagh	2	-	-	2
Cash Handling – Caravan Parks	2	5	4	11
Business Continuity Planning & Emergency Planning	-	5	2	7
Information Governance & Data Protection	2	3	6	11
ICT Environment	1	5	7	13
Review of Partnerships	-	4	4	8
Planning	-	-	5	5
Review of Performance Improvement Targets	-			
<b>Total</b>	<b>9</b>	<b>28</b>	<b>35</b>	<b>72</b>

The above recommendations have been revisited as part of this year's internal audit work programme. For each recommendation we met with the relevant officer to discuss and review evidence of progress.

## 2 Results of Review

We reviewed the progress made in implementing the recommendations in the ten internal audit assignments completed in 2016/17. The table below notes overall progress against recommendations at the time of our review (March 2017).

Status	Number of Recommendations			Total
	Priority 1	Priority 2	Priority 3	
Issue addressed	3	10	18	
Issue being addressed	6	12	15	
No longer a priority issue				
Issue not yet addressed		5	2	
<b>Total</b>	<b>9</b>	<b>27</b>	<b>35</b>	<b>71</b>

### Priority 1 Recommendations

The table above shows that 9 (100%) of the 9 Priority 1 recommendations across all audits completed in 2016/17 have been addressed or are in the process of being addressed.

### Priority 2 Recommendations

The table above shows that 22 (81%) of the 27 Priority 2 recommendations across all audits completed in 2016/17 have been addressed or are in the process of being addressed. 5 have yet to be addressed.

### Priority 3 Recommendations

In relation to Priority 3 recommendations, the table above shows that 33 (94%) of the 35 recommendations have been addressed, are in the process of being addressed. 2 have yet to be addressed.

### 3 Update on Prior Year Recommendations

#### 3.1 Invoicing & Debt Management

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Council should ensure that invoices are raised promptly following service provided/facilities used and that sufficient information is provided to Finance to enable the invoice to be accurately raised. The timeliness of raising invoices is particularly important where invoices are raised on a quarterly/ bi annual basis (for example rent and bin collection services) so that sufficient time is provided to the person being invoiced between invoices to increase the chance of payment being received on a timely basis. It is anticipated that the recent centralisation of the invoicing function should help to resolve this issue.</p>	1	<p>Agreed. With centralised invoicing invoices are raised by finance on more or less a daily basis, this does rely on service departments providing the necessary information in a timely manner to finance, procedures around this interaction could benefit with a review.</p>	<p><b>Issue Addressed.</b> Centralised invoicing commenced in February 2016. All centralised with the exception of Trade Waste where it still remains outside of finance for Moyle and Coleraine invoicing, Ballymoney and Limavady are carried out centrally in finance in Limavady. To bring all Trade Waste invoicing into finance in Coleraine would require additional staff for finance.</p> <p>Invoicing procedures updated and issued to staff.</p>
<p>The Chief Finance Officer should monitor the workload of the accounts receivable team and ensure that adequate resources are put in place to be able to manage all aspects of income including invoicing, receipt of payments, bank reconciliations and debt control.</p>	2	<p>Agreed. Staffing level of income section took into account the aspiration of centralised invoicing and credit control, planned review after first full year of operation to ensure appropriateness of staffing</p>	<p><b>Issue being Addressed</b> - Currently 3 full time members of staff and 2 part time members of staff. The structure is likely to be populated over the next month or so to include 5 full time members of staff.</p>
<p>Once the invoicing process is fully embedded, consideration should be given to reviewing how and where information is generated and recorded to create a more streamlined process.</p>	3	<p>Agreed. Procedural review to be carried out before end of calendar year</p>	<p><b>Issue Addressed</b> – Evidenced new procedures in place for invoicing and receipting income.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
The debt management policy should be discussed with the accounts receivable team and training provided as necessary to ensure that all staff are fully aware of the debt recovery procedures and the policy can be implemented promptly once approved.	2	Agreed. Debt management policy approved by committee on 19 April and full Council on 26 April, policy has been issued to Finance staff with instructions to implement.	<b>Issue Addressed</b> – Evidenced new policy approved April 2016 and issued to relevant staff. Updated in February 2017.
The Council should ensure that outstanding debt not already on the Finance system is posted promptly and followed up as appropriate. In line with recommendation 1.2, the Chief Finance Officer should also monitor the volume and flow of the workload of the accounts receivable section so that sufficient staff resources are in place and backlogs can be avoided.	2	Agreed. Outstanding invoices at 31 Mar 2016 will be entered on debtors ledger and subjected to new process.	<b>Issue Addressed</b> - significant increased workload for debtors team and therefore resourcing needs to be kept under review.
Now that the follow up of debt is being managed centrally by the accounts receivable team, the issuing of statements and reminder letters should be resumed promptly in line with the debt management process. A clear audit trail should be maintained of all actions taken for the recovery of debt. Once payment has been received by the accounts receivable section, it is important that the original service area is informed, particularly where businesses avail of repeated use of Council services (such as leisure centres, landfill sites and commercial collections) so that on-stop lists can be kept up to date.	1	Agreed. Issue of monthly statements and reminders commenced in April 2016 to coincide with expected implementation of new debt management policy. Regular updates to service departments in place.	<b>Issue Addressed</b> - debt management policy is being followed due to some operational issues may not always be on a monthly basis but customers are progressing through the policy and being taken to court where necessary
Monthly reviews of credit notes should take place (by a person independent of those processing them) to ensure that credit notes raised are appropriate and that details such as costs charged are accurate.	2	Agreed. Agreed, all credit notes to be reviewed by either CFO or FA prior to issue with immediate effect	<b>Issue Addressed</b> - reviewed by Financial Accountant, some approved electronically and others periodically.

Recommendation	Priority Level	Management Response	Position at March 2017
<p>Once the debtors ledger is fully operational with old debts posted (including any legacy debts), a process should be put in place so that those debts which are unlikely to be recovered are written off as appropriate. This could include undertaking a review to assess older debts (more than two years old) and determine whether these can be collected or should be written off. These should then be reported to and, where appropriate approved by, the Council on a timely basis in line with the debt management policy.</p>	3	<p>Agreed. Following implementation of the new debt management policy all debtors will be processed in accordance with the policy and a review will be carried out around Sep '16 to consider the need for any write-offs.</p>	<p><b>Issue Addressed</b> – in progress as per Chief Finance Officer. Evidence of recent debt updates and write offs through Corporate Policy and Resources Committee 17/1/17.</p>
<p>Once the debtors ledger is fully operational Finance staff should ensure that the debtors ledger is reconciled to the general ledger on a monthly basis in line with good practice.</p>	3	<p>Agreed. Invoice batches to be reviewed to ensure correct postings and reconciled to GL and aged debt report with immediate effect.</p>	<p><b>Issue Addressed</b> – A member of staff updates all debtor batches and reconciles to general ledger.</p>
<p>Consideration should be given to providing aged debt reports to Heads of Service on a regular basis for information purposes (even though follow up activities are carried out by accounts receivable). Regular meetings should also take place to act as a two way process for keeping both Finance and Heads of Service informed (for example to review and discuss persistent bad payers with a view to withdrawing credit facilities and/or making alternative arrangements for payment e.g. payment in advance). It is anticipated that the centralisation of debtors will improve the overall recovery of debt and therefore also reduce the need for some communication, making these meetings more focussed.</p>	2	<p>Agreed. Aged debt reports to HoS on monthly basis with updates on “bad debt” – commence Aug '16 to allow full implementation of new policy.</p>	<p><b>Issue Addressed</b> – SMT and Council are informed of those customers going through the debt management policy and what stage of the process they are at – ie legal action notice sent or small claims lodged.</p>

### 3.2 Cash Handling – Coleraine Leisure Centre

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Manager and Business Support Officer should continue with refining and modifying the policy and procedures for cash handling. Once formalised, these should be provided to all staff involved in handling cash and training rolled out.</p>	<p>3</p>	<p>Agreed.</p>	<p><b>Issue Addressed</b> - the new procedures for Cash Handling in CLC are now in place and training has been rolled out.</p>
<p>Duty supervisors should ensure that hairdryers are emptied on a monthly basis, and that the till receipt is signed by both staff members involved in the collection and attached to the daily income analysis sheet. Consideration should also be given to documenting the procedures on the collection of income from hairdryers in the cash handling procedures for reference purposes.</p>	<p>3</p>	<p>Agreed. A documented procedure will be formulated to address this issue, and staff trained accordingly.</p>	<p><b>Issue Addressed</b> – emptied on a monthly basis and new procedures are in place.</p>
<p>Staff should be reminded to ensure that receipts for refunds printed with an explanation of the reason for the refund and signed by the duty officer as authorisation of the refund. This could be reinforced with the cash handling procedures.</p>	<p>3</p>	<p>Agreed. Whilst Centre Management accept that receipts for refunds were not present and on occasions, not signed by the Duty Supervisor, the value of this process needs to be reviewed with a view to maximising the use of the Legendware System (front of house booking system) and minimising the number and relevance of receipts attached to daily reconciliations. Legendware holds information on every transaction at front of house and the exact dates and times of transactions can be selected for reporting purposes. The staff who issued the refund and the</p>	<p><b>Issue Addressed</b> – through the legend system. Procedures in place for issuing refunds.</p>



Recommendation	Priority Level	Management Response	Position at March 2017
		<p>individual the refund was issued to are all held with the web based system. Centre Management will review the process of issuing refunds, set the limits of refund and the authorisation levels for these, and identify who is best placed to sign off refunds. In the interim period the existing control measures will be reinforced by Centre Management.</p>	
<p>Consideration should be given to making arrangements for the collection of lodgements directly from the leisure centre by the security provider. This would reduce the time spent by back office staff in the possession of large sums of cash.</p>	<p>2</p>	<p>Agreed. Centre Management will consult with the Head of Finance regarding an acceptable maximum level of income held in a till at a given time. Following the outcome of this, a mid shift cash lift will be implemented with the relevant staff involved trained accordingly</p>	<p><b>Issue being Addressed – September 2017</b></p>
<p>Consideration should be given to making arrangements for the collection of lodgements directly from the leisure centre by the security provider. This would reduce the time spent by back office staff in the possession of large sums of cash.</p>	<p>3</p>	<p>The insurance limits on the Safes for Coleraine Leisure are acceptable for normal operating of the facility. Centre Management will conduct a review of the collection of takings from outside facilities/services, so that monies collected and reconciled in CLC do not compromise the systems already in place in the Centre.</p>	<p><b>Issue Addressed</b> – insurance limits on safes are adequate. Cash from outside facilities are received more efficiently.</p>

### 3.3 Cash Handling - Ballyreagh

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Council should complete a full and detailed review of the financial controls and processes in place at the golf course (as part of its wider review of cash handling and financial controls across its leisure sites, as recommended in previous audit reports).</p> <p>As part of this review, a clear cash handling policy and procedures should be developed covering receipt of income, till reconciliation, security of cash, and accuracy and monitoring of income records, linking across all leisure sites including Causeway Coast and Glens Borough Council. Consistent recording templates and checklists should be developed for use across all sites to ensure consistency of approach and provide a standard process for staff working off-site. Training should then be provided to staff (including any agency staff) involved in cash handling at the golf course.</p> <p>In addition, the Council should put in trend analysis controls for income received at the golf course (and other leisure sites) to reduce risk and identify opportunities for service/site development and increased income generation.</p>	1	<p>Agreed. Management will commence in consultation with the current licence holder and Council Business Support Staff a review of the current financial controls which exists at Ballyreagh Golf Course. In conjunction with the Licence holder, management will establish and implement safe systems of control, with associated paperwork to standardise processes and reduce risk.</p>	<p><b>Issue being Addressed</b> – to be implemented Summer 2017. Management have commenced in consultation with the current licence holder and Council Business Support Staff a review of the current financial controls which exists at Ballyreagh Golf Course. A suitable till, (which will allow for the separation of income) is being sourced. A credit card payment system is also being investigated.</p> <p>When suitable technology has been sourced, Officers will clearly document a cash handling procedure which will address the receipt of cash, reconciliation of cash, right through to the lodgement of cash. In conjunction with the Licence holder, management will establish and implement safe systems of control, with associated paperwork to standardise processes and reduce risk</p>
<p>The Council should ensure that adequate arrangements are put in place to hold cash securely once received and until lodgement. In addition, lodgements should be sufficiently frequent to</p>	1	<p>Agreed. Management in consultation with the Licencee will review the current</p>	<p><b>Issue being Addressed</b> – to be implemented Summer 2017. Management in consultation with Licencee have commenced a review of the current procedures/practices</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>reduce the risk of the build-up of large cash amounts on site and risk to staff when taking lodgements for banking.</p> <p>Security of cash held and collection/banking of lodgements should be reviewed across all leisure sites to determine whether common arrangements can be made (particularly for sites situated close to each other) and staff cover arrangements reviewed to ensure that these are appropriate and lodgements can be made securely.</p>		<p>procedures/practices for the securing of cash on site and the subsequent transportation of cash to the bank.</p> <p>Council staff will work closely with the Licencee to ensure that adequate cash storage is available and managed on site within specified amounts, safe banking arrangements will be implemented to ensure timely lodgements are carried out within set timeframes.</p>	<p>for the securing of cash on site and the subsequent transportation of cash to the bank.</p> <p>Given the large amounts of money collected and stored on site during the summer, alternative banking arrangements will be investigated and if feasible implemented.</p>

### 3.4 Cash Handling – Caravan Parks

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Council should develop procedures for cash handling at all caravan parks. Once formalised, these should be provided to all staff involved in handling cash and training rolled out.</p>	2	<p>Agreed. Council will review procedures already in place at similar businesses under its management (e.g. Leisure Centres), and will adapt these as appropriate. The procedures that have been applied in the legacy councils will be reviewed against best practice, and one single set of standard procedures will be introduced. All wardens will be trained in these procedures, and will in turn take responsibility for training any seasonal staff whose duties include cash handling.</p>	<p><b>Issue being Addressed</b> – Procedures in place and training provided for all sites. However, the parks will be recruiting new seasonal staff and this should be rolled out by 30/4/17.</p>

<p>Wardens should ensure that laundry machines, showers and any other vending income are emptied by two staff members (where possible) on a regular basis and are receipt is signed by both staff members involved in the collection and attached to the warden's report/ lodgement records that are sent to Finance. Given the high amounts of cash involved, wardens should ensure that this cash is collected and counted on the same day as lodgement to reduce high amounts of cash being held on site.</p> <p>The practice of using cash from showers to provide change to customers arriving 'on spec' should be eliminated where possible to further avoid the risk of only one person collecting. This could be overcome, for example by increasing the change float and ensuring sufficient coinage is held. As an additional control, a trend analysis should be performed for cash collected each year to monitor income in relation to showers and laundry.</p>	<p>1</p>	<p>Agreed. Where the number of staff permit the practice, laundry machines, showers and any other vending income will be emptied by two staff members on a regular basis and the entry in the record book for such income will be signed by both staff members involved in the collection. This will be kept at the Park, and a copy of the page sent to Finance along with the warden's report/ lodgement records on a regular basis. Such income is restricted to times when a Park is open, which corresponds to when 2 staff members are employed. Should collection be required when only 1 staff member is on duty, the warden will schedule a Council employee (usually the General Manager, Caravans) to be in attendance to fulfil this requirement. Cash will be collected, counted and lodged on the same day, or as soon thereafter as possible.</p> <p>The anomalies noted in bullet points 2-4 in 2(a) above have been accounted for: the £80 has been explained, and the variance in shower income is due to one park charging 20p and the other charging 50p per shower period.</p>	<p><b>Issues Addressed</b></p>
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Recommendation	Priority Level	Management Response	Position at March 2017
		The practice of using cash from showers to provide change to customers arriving 'on spec' will stop where possible with change floats being increased as necessary and sufficient coinage being held. A trend analysis will be performed for cash collected Each year to monitor income in relation to all such miscellaneous income.	
Consideration should be given to ensuring that all floats are reconciled on a daily basis and signed off by the warden / duty supervisor as evidence that they have counted the float (as well as reconciling the daily takings to camp manager). This would provide additional assurance should a discrepancy occur where different shifts are operated.	2	Agreed. All floats will be reconciled on a daily basis and signed off by the warden / duty supervisor as evidence that they have counted the float. The daily takings will be reconciled against Camp Manager for all caravan income (but not for miscellaneous income).	<b>Issue Addressed</b>
Consideration should be given to formalising the arrangements in place with the gaming operator and the contents of the coin box should be counted in the presence of a staff member, processed through the till and the receipt signed by both as evidence of this.	3	Agreed. The gaming operator will not be given access to any machine unless a member of staff is present. The contents of the coin box will be counted in the presence of this staff member, processed through the till, and the receipt signed by both as evidence of this.	<b>Issue Addressed (largely Benone)</b>
Caravan park staff should be made aware of the importance of credit/debit card security procedures and should ensure that credit card information is not documented. Card verification codes should never be documented or stored. Any	1	Agreed. The Council will comply fully with Payment Card Industry Data Security Standards. The various procedures concerning refunds, carried over from the 4	<b>Issue being Addressed</b> – parks will be recruiting new seasonal staff and this should be rolled out by 30/4/17.  Council booking refund policy to be put in place by 30/4/17.

Recommendation	Priority Level	Management Response	Position at March 2017
<p>card information which is held, should be maintained in a secure location.</p> <p>Consideration should also be given to developing a Council booking refund policy to provide guidance to wardens and ensure consistency across the caravan parks.</p>		<p>legacy councils, will be reviewed in order to produce a single Council booking refund policy to provide guidance to wardens and ensure consistency across the caravan parks.</p>	
<p>At Benone Supervisors and the Warden who are responsible for cashing up at the end of shift and reconciling till reports to the takings should ensure that any under/overs are recorded and lodgements should reflect actual takings. Any discrepancies above a certain limit should be investigated further.</p> <p>Where cash counts are being performed, these should be conducted by two people if available. One member of staff should be responsible for counting cash and the other for checking this is accurate and the cash up sheet should be signed to document evidence of this. In addition, consideration should be given to setting a limit at which a cash lift is performed to minimise large build -ups of cash in the till and reduce risk of misappropriation. Appropriate documentation should be maintained to complete the audit trail.</p> <p>The warden should continue with periodic spot checks on cash within the till drawers and document evidence of this check.</p>	<p>2</p>	<p>Agreed. All staff responsible for cashing up at the end of shift and reconciling till reports to the takings will ensure that any discrepancies are recorded so that lodgements reflect actual takings. Any such amount above £5 will be brought to the attention of the General Manger for Caravan Parks and investigated further.</p> <p>Separate user logins will be used for different till users.</p> <p>All cash counts will be conducted by two people if available: one to count the cash and the other to check for accuracy, with the cash up sheet signed as evidence of this. A cash lift will be performed when the amount exceeds £3,000 and this will be recorded and signed off in the day diary, as will random periodic spot checks performed on cash within the till drawers by wardens.</p>	<p><b>Issues being Addressed</b> – where possible not always practical at all parks to be completed by 30/4/17.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>In addition to developing common cash handling procedures, consideration should be given to reconciling income from touring caravans and tents as recorded on camp manager to cash received and lodged from each site to provide a complete analysis of expected income against that received.</p>	2	<p>Agreed. Common cash handling procedures will be initiated following consultation with Council staff in other work streams. This will include reconciling income from touring caravans and tents as recorded on Camp Manager to cash received and lodged from each park.</p>	<p><b>Issue being Addressed</b> – in touch with Camp Manager to be completed by 30/4/17.</p>
<p>Staff should ensure that they use individual usernames and passwords when processing bookings.</p>	3	<p>Agreed. All Staff will use individual usernames and passwords when processing bookings.</p>	<p><b>Issue being Addressed</b> – where possible, not always practical at all parks to be completed by 30/4/17.</p>
<p>Staff should be reminded to ensure that receipts for refunds are printed with an explanation of the reason for the refund and signed by the supervisor as authorisation of the refund.</p>	3	<p>Agreed. Staff will ensure that receipts for refunds are printed with an explanation of the reason for the refund and signed as authorisation of the refund.</p> <p>A summary sheet will be developed to daily record all ins/outs of such deposits, and will be signed off by the supervisor.</p>	<p><b>Issue Addressed</b></p>
<p>Wardens should be made aware of the insurance limits on site and lodgements should be made frequently to ensure that the limits are not exceeded. Consideration should be given to increasing the insurance limits for the safe at the Benone tourist complex, at least on temporary basis, to cover the busy summer period.</p> <p>Where no safe or cash box is in place, consideration should be given to storing cash</p>	2	<p>Agreed. Appropriate insurance limits, and the secure storage of cash takings, will be reviewed on a Park by Park basis in consultation with Finance branch. Wardens will make themselves familiar with these insurance limits, performing lodgements as required so as to ensure that such limits are not exceeded.</p>	<p><b>Issues being Addressed</b> – to be completed by 30/4/17.</p>



Recommendation	Priority Level	Management Response	Position at March 2017
<p>taking in a more secure cash box prior to lodgement.</p> <p>As part of the overall review of cash handling, a review of cash being transported should be undertaken with a view to minimising the risk involved with staff handling cash in transit. For example two caravan sites and the council owned golf course are in close proximity and arrangements could be made for the collection of cash at these sites by an external provider. This would also reduce the time spent by staff in the possession of large sums of cash.</p>		<p>A review of cash being transported (including the option of using an external provider) will be undertaken to reduce the risk to staff who handle cash in transit.</p>	
<p>As a matter of good practice and given that deposits for washrooms and barrier cards are held at the counter in the reception area in an unsecured filing box, the Warden should ensure that the reception is locked when unattended. In addition, during peak season, cash deposits in excess of £500 could be held in the filing box and it is therefore important that this is kept out of sight of public view.</p>	<p>3</p>	<p>Agreed. No cash, deposits, or activated barrier cards will be visible at any Park counter, and wardens will ensure that their reception or office is locked when unattended</p>	<p><b>Issues Addressed</b></p>

### 3.5 Business Continuity Planning & Emergency Planning

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Council should develop and implement a Business Continuity Plan to ensure that there is clarity as to the procedures to be followed and roles and responsibilities to activate and respond to emergency situations as they arise. Once developed, responsibility for reviewing and updating the Plan should be clarified and a programme of training rolled out to staff and elected members.</p> <p>If appropriate, consideration should be given to following a model business continuity template such as ISO 22301: 2012 that provides a universal framework for organisations to follow, to ensure that business continuity plans are fit for purpose.</p>	2	<p>Agreed. The necessity to develop a Business Continuity Plan for the organisation has been identified in the current business plan 2016-2017 for the Health and Built Environment section. In the continuing absence of a manager identified as responsible for Emergency Planning and Business Continuity, a specific resource will be identified from within the section and tasked to coordinate and prepare a suitable plan. The plan will follow the template as set out in ISO 22301: 2012. Each Head of Service will be responsible for providing information to enable the plan to be populated to ensure that it will be fit for purpose. A copy of the Business Continuity Plan will be presented to the Environmental Services Committee for consideration and Council approval.</p>	<p><b>Issue not yet Addressed</b> - As per Head of Health and Built Environment, there has been little progress with this due to lack of resources.</p>
<p>Business continuity plans should be developed at Service level. These should include a business impact analysis to identify areas at greatest risk to interruption to service delivery such as prolonged loss of staff, unavailability of a Council building or increased demand on services. For each of the areas identified, contingency actions currently in</p>	2	<p>Agreed. The coordinating officer as identified above will work with Heads of Service to ensure consistency and appropriateness for the specific service unit. The plan will be made available in different formats (electronic and</p>	<p><b>As above</b></p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>place (such as data backed up off site) and further actions to take in the event of an incident occurring (such as redeployment to other locations) should be identified and documented.</p> <p>Once developed, Heads of Service and Service Unit managers should ensure that they can access their plans (eg hard copy, downloaded copy to Council smartphone) in the event that the network or access to Council buildings. As part of this Heads of Service should ensure that out of hours numbers are held for all staff under their control so that a call cascade system can be appropriately implemented in an emergency or disruption to services. Contact details should be periodically checked to ensure that they remain up-to-date.</p>		<p>hard copy) and contain appropriate out of hours contact details for the service unit. It will be for the Head of Service to identify a specific officer within in each service unit to be allocated the responsibility of ensuring contacts details are held securely, and remain accurate with checks completed on a quarterly basis.</p>	
<p>Consideration should be given to making Emergency and Business Continuity Planning arrangements an agenda item at SMT meetings on a quarterly basis. Alternatively, if appropriate, the Council may wish to establish an Emergency Planning Implementation Group (EPIG) to discuss internal Emergency and Business Planning and emerging issues such as severe weather warnings and to receive updates from group meetings attended by the Chief Executive, Emergency Planning Co-ordinating Officer and other Environmental Health Officers in attendance. If an EPIG is established, terms of reference should be developed to ensure that there is clarity as to the group's role and remit.</p>	3	<p>From September 2016, Emergency planning officers within the Health &amp; Built Environment section will meet on a monthly basis to discuss and review arrangements within council and to consider information from the Northern EPIG. The sub Regional EPCO (shared service) will attend. Notes of these meetings will be recorded.</p> <p>Consideration will be given to the establishment of an internal EPIG, membership and frequency of meetings. There are arrangements already in place to</p>	As above

Recommendation	Priority Level	Management Response	Position at March 2017
		<p>share severe weather warnings with all Heads of service. Emergency Planning Officers have access and permission to circulate to all employees. The information circulated will be reviewed and where appropriate specific advice given as to actions to be taken. Service area updates will continue to be provided to SMT/Heads of Service quarterly meetings and will specifically include Emergency Planning and Business Continuity Planning matters.</p>	
<p>Consideration should be given to developing a list of volunteers from within each service area who would be willing to act in event of civil contingency or emergency (identifying home contact details, skills they have and possible roles they could undertake).</p>	<p>3</p>	<p>Arrangements to be agreed as to the response made to requests for additional manpower by outside agencies. This will involve the Head of Operations, Head of Estates and Head of Organisational Development. In addition to contact details being provided by staff of service areas for business continuity purposes, Heads of Service will be asked to collate a volunteer list identifying availability, contact details and any special skills.</p>	<p><b>As above</b></p>
<p>The Council should continue with the training and testing arrangements in relation to emergency planning and develop a schedule of formal</p>	<p>2</p>	<p>A formal Emergency Plan and Business Continuity training and testing plan will be prepared. The</p>	<p><b>As above</b></p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>emergency management tests to ensure that, in the event that they are activated, they operate as intended. This should include testing in relation to specific roles as outlined in the plan. Debriefs should be documented following these testing exercises or where emergency/business continuity plans have been activated to ensure that lessons learned are captured and action taken to implement learning. Consideration should also be given to assigning deadlines for follow-up on learning points identified and a review process should be undertaken to ensure all learning points are actioned.</p> <p>A record of all Council staff taking part in various exercises should also be maintained as evidence of any training</p>		<p>filling of the post with this specific responsibility will assist in compliance. The testing regime will include all roles identified within the plan. All test exercises will include an evaluation to ensure lessons are learned and recommendations for amendment are considered. Attendance records will be maintained for all training exercises. Recording arrangements will be agreed with the Head of Organisational Development</p>	
<p>The locations of emergency control rooms should be reviewed to determine those that are most appropriate for Council in its new structure. All rooms designated as possible emergency control rooms should be tested to ensure that they will operate as intended in the event of an emergency (eg ICT, access).</p>	<p>2</p>	<p>The location of Emergency Planning Control Rooms will be reviewed on agreement of the organisations estate strategy. The control room within Cloonavin will remain the Director of Performance office. An audit of that offices capability will be conducted to ensure it is fit for purpose by October 2016. The capability will be replicated in the other designated Emergency Planning Rooms as agreed by SMT. A proposal will be put forward by the Head of Health &amp;</p>	<p><b>As above</b></p>

Recommendation	Priority Level	Management Response	Position at March 2017
		Built Environment to SMT by October 2016.	
<p>The IT department should work with individual service area to identify critical IT requirements for each department should the need arise to relocate to another location. This will enable each department to plan and prioritise their services based on the IT resources available to them. A formal Business Continuity Plan testing plan then should be agreed and implemented. This plan should outline the type of tests that might be used and a testing frequency. A live test of Business Continuity plans with staff from each critical service within the Council should be also carried out to test the entire IT systems on an annual basis. Other areas that should be tested on a regular basis include the call cascade system at all levels to ensure that it is possible to communicate important information efficiently and effectively to all staff and testing of any back up generators. Such tests could be carried out with minimal difficulty, and additional confidence could be gained in relation to these important elements of the plan.</p>	2	Agreed. On completion of the Business Continuity Plan a test of its effectiveness will be carried out and any findings relating to improvements incorporated as necessary.	<b>As above</b>

### 3.6 Information Governance & Data Protection

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The various data protection and information management procedures (including ICT policies and procedures) should be finalised by the Information Governance Officer/Information Security and Management Group and implemented as soon as possible. There is a significant amount of detail in the various procedures and consideration should be given to reviewing how best to present this (eg creating simple flowcharts or shorter summary guides) to increase ease of understanding and likelihood of implementation. Given the number of procedure documents, the detail contained in them and the fact that data protection training will be new to many staff, training should also be delivered for staff covering the procedures as they roll out. Consideration should also be given to including information governance and data protection as part of formal staff induction programmes.</p>	<p>1</p>	<p>The majority of the documents in draft have now been approved by SMT, JCNC and Council and they will be put on the staff portal and Council website where appropriate. ICT policies and procedures have yet to be approved – responsibility of Head of ICT. The Information Governance Officer is currently preparing flow charts and summaries for these documents where appropriate. A training programme in relation to these policies and procedures, as well as general information governance issues is currently being developed. The issue here is sourcing a trainer who can deliver this training at the various levels required. HR will be asked to consider the inclusion of information governance issues as part of the formal staff induction programmes.</p>	<p><b>Issue being addressed</b> - ICT Policies and procedures in draft form. Currently progressing through the consultation process. To be completed by April 2017</p> <p><b>Issue Addressed</b> - Flow charts &amp; summaries prepared by IGO by Jan 2017.</p> <p><b>Issue being addressed</b> - A web based e-learning system for training is also in progress and is expected to be rolled out by the end of Q2 2017 by HR.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>File security should be reviewed, particularly where staff are moving offices but leaving information behind, to ensure that no personal or confidential data is left unsecured. In addition, the practice of leaving the strong room in Limavady unlocked and open during the day should be reviewed and the safe and filing cabinet used by Registration in Limavady should be locked at all times when not in use to prevent unauthorised access to Council files.</p>	1	<p>A process will be agreed within the Estates Strategy to ensure all information is secured when staff are moving offices.</p> <p>The Civic Facilities Manager will review the operation of the strong room in Limavady and put in place new secure arrangements.</p>	<p><b>Issue being addressed</b> - The Civic Facilities Manager is managing all information ensuring it is secured during each move, in accordance with Councils Retention and Disposal Schedule.</p> <p><b>Issue Addressed</b></p>
<p>Training and clear guidance should be provided to staff if the proposed information classification system is introduced.</p> <p>Consideration should also be given as to how to support staff in implementing the classification system and in monitoring that it is effectively supporting Council to understand the information that it holds and the level of security required to protect it.</p>	3	<p>The Records Management Policy and the Records Management Handbook have both now been approved by SMT, JCNC and Council. Both have been placed on the staff portal. A training programme on the system to be provided when an appropriate trainer has been sourced. Implementation of a monitoring system will take place follow the roll out of the training for appropriate staff.</p>	<p><b>Issue being addressed</b> - A suitable provider is currently being sourced by the Head of Policy and the training programme in relation to the Records Management Policy and the Records Management Handbook will be provided by May 2017</p> <p>Training in relation to the Records Management Policy and the Records Management Handbook Training programme is dependent on training taking place.</p>
<p>Consideration should be given as to how to implement the creation of departmental information asset registers to ensure that staff are supported through the process and that adequate records of information assets are maintained.</p>	3	<p>An Information Risk and Assurance process has been agreed by SMT, JCNC and Council. This involves the appointment of a Senior Information Risk Owner, Information Asset Owners and Local Information Co-ordinators within Council. One of the responsibilities of the Information Asset Owners and Local</p>	<p><b>Issue being addressed</b> - SIRO and IAO's appointed. Local Information co-ordinators yet to be addressed.</p> <p>Staff to be trained once information co-ordinators are appointed.</p>



Recommendation	Priority Level	Management Response	Position at March 2017
		Information Coordinators is to maintain their Department's information asset register. These staff have yet to be identified and once in place a training programme will be rolled out to implement the process. The Information Governance Officer will provide on-going support thereafter.	
The Information Governance Officer should work with the Head of Performance to ensure that information that is collected as part of the driver audit (eg driver licence and car insurance details) is adequately protected and that no more information than is required is collected. If line managers (rather than a central unit) are to be tasked with collecting this information, guidance should be provided to all line managers as to what information to collect, how to store it and who it should and should not be shared with.	2	The Information Governance Officer has recommended the following: <ul style="list-style-type: none"> <li><input type="checkbox"/> Centralising the review of licence details so that one person has overall responsibility rather than all line managers across Council.</li> <li><input type="checkbox"/> Ensuring that officers collecting this information understands what they should/need to record, eg it may be sufficient to note information such as driver licence expiry date or that they've seen a valid insurance certificate rather than keeping copies of these documents.</li> <li><input type="checkbox"/> Ensuring the person collecting the information understands the need to store</li> </ul>	<b>Issue being addressed</b> - Information Governance Officer has provided advice and recommendations on how to deal with information captured during the driver audit and it is understood from the Health and Safety Unit that the process used will be subject review in the near future

Recommendation	Priority Level	Management Response	Position at March 2017
		<p>personal information such as this securely.</p> <p><input type="checkbox"/> Verifying how any external agency used to complete the audit will ensure the security of the data held – is this covered in the contract?</p>	
<p>The Premises Manager should continue to identify keyholders for the main Council sites. In the meantime and until the Estates Strategy has been fully implemented and access controls updated for each building, staff should be reminded to ensure that confidential, personal or sensitive information is kept secure at all times.</p>	2	<p>The premises key holder system will be reviewed to ensure appropriate control arrangements are in place.</p> <p>Reminder about keeping confidential, personal or sensitive information secure – email from Director of Performance.</p>	<p><b>Issue Addressed</b></p> <p>There is a section in every staff newsletter containing advice and information to all staff in relation to Information Governance, signposting staff to the Staff Portal.</p>
<p>Council should roll out the ID badge system to all staff, visitors and contractors to ensure that people can be easily identified and that no unauthorised individuals gain access to information or areas which should be restricted.</p>	2	<p>The Council has recently purchased a machine to produce ID badges and a policy and process will be created to implement the changes.</p>	<p><b>Issue Addressed</b></p>
<p>Managers should be advised to review whether databases that may be held within their departments holding personal details relating to projects (names/addresses etc) should be password protected or restricted folders set up so only those department staff working on the project can access the data.</p>	3	<p>E-mail can be circulated to this effect to staff by the Director of Performance.</p> <p>The Information Security and Management Group will be considering developing recommendations on password protecting documents when sending them through unsecure servers.</p>	<p><b>Issue being addressed</b> - Discussed by ISMG and to be considered further by ICT.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>The Information Governance Officer should work with Managers to identify where Council is engaged in data sharing arrangements and review whether there is a need for information sharing protocols to be developed for projects in which personal data is shared between agencies, if no such protocol currently exists (particularly where this is shared on a systematic basis and if information sharing responsibilities and requirements are not set out within a project agreement or contract).</p>	<p>3</p>	<p>The Information Governance Officer will work on a one to one basis with all Heads of Service to assist them in identifying where information sharing protocols already exist or need to be put in place.</p>	<p><b>Issue Addressed</b></p>
<p>A process should be put in place to review the information held by Council (both hard copy documents in offices and archive/storage and electronic information) to dispose of information that is no longer required to be held. All records should be disposed of in accordance with the approved retention and disposal schedule.</p>	<p>3</p>	<p>The Council's Retention and Disposal Schedule has now been approved by the Assembly and the Chief Executive has circulated an e-mail advising Heads of Service that the Schedule is now operational. A copy of the approved version was attached and managers advised that all records should now be disposed of in accordance with the Schedule. With regard to legacy records, these have now transferred to the responsible service area and should also be dealt with under the new Retention and Disposal Schedule. In addition, managers were advised by the Chief Executive that, in accordance with the Public Records Act (NI) 1923, a record of each file destroyed must be kept. An excel spreadsheet was</p>	<p><b>Issue being addressed</b> - A suitable provider is currently being sourced and the relevant training will be delivered in due course on records management to include specific training for Local Information Co-Ordinators who will have responsibility for retention and disposal of records.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
		attached for this purpose and a copy was to be updated at each Department / Directorate level. Relevant training will be delivered in due course on records management to include specific training for Local Information Co-Ordinators who will have responsibility for retention and disposal of records.	
A consistent process for the disposal and collection of confidential waste should be implemented across the Council's sites including access to confidential waste bins for all relevant premises, shredders if required and defined procedures for storage of confidential waste, review and filing of signed collection notes/certificates of destruction. Staff should be provided with guidance as to the confidential waste arrangements at their site and what should and should not be placed in the confidential waste. Staff should also be reminded to ensure that they sign the confidential waste collection notes as evidence that they observed the waste being shredded.	3	Agreed	<b>Issue being addressed</b> – All confidential waste co-ordinated through the Civic Facilities Manager. A company has been sourced to remove Confidential waste across all sites from 1/4/17.

### 3.7 ICT Environment

Recommendation	Priority Level	Management Response	Position at March 2017
<p>ICT should progress the implementation of its plans set out in the report to the Corporate Policy &amp; Resources Committee in June 2016 so that an integrated Causeway Coast &amp; Glens Borough Council approach to ICT across all Council sites and legacy systems is put in place.</p> <p>Consideration should also be given to developing a more detailed ICT Strategy (including a roadmap or action plan) which supports the Council's Estates Strategy and demonstrates how ICT will support delivery of the Council's corporate objectives.</p>	3	Agreed. The 3 ICT Management posts of Infrastructure, Operations and Digital Services are expected to be appointed in November 2016.	<p><b>Issue Addressed</b></p> <p><b>Issue being Addressed</b> – estimated to be complete by May 2017</p>
<p>ICT should review the requirement for external ICT contract support in Ballycastle to determine if it is required under the proposed structures. If the arrangement is to continue, a formal contractual arrangement should be put in place to cover the services of the ICT contractor and the responsibilities regarding safeguarding and maintaining confidentiality of Council information.</p>	3	Agreed. Issue is currently being addressed, as part of ICT Structure.	<p><b>Issue being Addressed</b> – currently developing a new contract – estimated to be complete by April 2017.</p>
<p>The ICT policies and procedures should be finalised and implemented as soon as possible and ultimately staff should sign the policy acceptance sheet as evidence that they have read and accept these. Training should also be provided for staff on key points within the policies and procedures, particularly where these may be different from legacy practices (eg prohibition of use of personal pen drives and risks of using same, procedures if need a third party to log-on)</p>	2	Agreed. Union representatives and other interested parties will be consulted to ensure that we move, in a sensitive manner, from the different legacy policies and procedures to an agreed CGBC configuration. The new policies and procedures must balance the needs of the organisation with the	<p><b>Issue being Addressed</b> – ICT policies and procedures have been drafted and are currently going through the consultation process.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>ICT should continue to progress the configuration of the Microsoft System Centre so that a helpdesk system can be implemented as soon as possible to ensure that there Causeway Coast &amp; Glens Borough Council is an adequate process for logging and tracking all incidents and identifying similar types of incidents that could indicate other issues</p>	3	<p>customs and practise of the legacy organisations.</p> <p>Agreed. A more informal approach was prevalent in the smaller organisations. The formalised helpdesk is currently being piloted in a controlled manner.</p>	<p><b>Issue being Addressed</b> – pilot helpdesk in place – estimated to be complete by May 2017.</p>
<p>Managers should be reminded to ensure that mobile phone request forms are adequately completed and appropriately authorised. ICT should ensure that all forms are centrally stored as part of records management procedures. ICT should also request that all individuals issued with a mobile phone sign the Mobile Phone Policy Declaration as acceptance of the conditions of use. Further, consideration should be given to introducing a similar acceptance sheet for mobile devices such as iPads.</p>	3	<p>Agreed. ICT must take a more robust approach both with colleagues to ensure that the relevant paperwork is completed and in internal ICT Section practises. Mobile phone usage was formally the responsibility of disparate departments in the legacy Councils; in CCGBC, the ICT structure reflects the need for a more centralised resource.</p>	<p><b>Issue Addressed</b></p>
<p>Consideration should be given to reinstating the sign-in logs for each server room so that an adequate record is maintained of who accesses the server room and when. Consideration should also be given to implementing individual ICT Admin accounts to enable greater tracking, if required, of actions taken at an ICT Admin level.</p>	3	<p>Agreed. The security recommendations will be reviewed as part of the ICT Security policy.</p>	<p><b>Issue Addressed</b> – sign in logs in place for each server room. Test server purchased January 2017.</p>
<p>Pin code or pattern access should be automatically enforced on Council-issued smartphones to prevent unauthorised access to Council email or information.</p>	2	<p>Agreed. The enhanced ICT Structure, in the form of a Security Officer, will facilitate this being achieved.</p>	<p><b>Issue being Addressed</b> – the ICT structure is currently being finalised which will facilitate a security officer.</p>

Recommendation	Priority Level	Management Response	Position at March 2017
<p>ICT should also review the arrangements for staff accessing their Council email account on their own devices to ensure that any remote management policies that are applied on Council-issued devices can also be applied for user-owned devices.</p> <p>Further, consideration should be given to encrypting laptops to prevent unauthorised access to Council data in the event that a laptop is lost or stolen. In the meantime, staff should be reminded that information held on a laptop may be at risk if the laptop is lost or stolen and to therefore take care of the security of their device.</p>			<p><b>Issue being Addressed</b> - Estimated to be completed April 2017</p> <p><b>Issue being Addressed</b> - Estimated to be completed April 2017</p>
<p>A process for notifying ICT of leavers should be introduced to ensure that accounts can be disabled once the individual leaves or passwords reset if accounts require to remain enabled for any reason. Consideration should be given to ICT staff signing and dating any leaver forms developed as evidence of when the accounts and Outlook Web Access were disabled.</p>	2	<p>Agreed. ICT must work in partnership with HR and HoS to ensure its implementation</p>	<p><b>Issue being Addressed</b> – HR inform ICT of leavers. Forms to be developed April 2017.</p>
<p>Consistent approaches to server monitoring should be developed to ensure that patches and server updates are applied in a timely manner (in particular in relation to servers in Ballycastle). Server security logs should also be reviewed periodically to identify any unusual server access or attempts to access the server</p>	2	<p>Agreed. The enhanced ICT Structure, in the form of a Security Officer, will facilitate this being achieved.</p>	<p><b>Issue Addressed</b> – server logs and monitoring in place Jan 2017.</p>
<p>ICT should review the recommendations from the external service provider's report with regard to the security settings for the firewall in Ballycastle (and across Council's other firewalls) to determine if these should be implemented.</p>	2	<p>Agreed. The enhanced ICT Structure, in the form of a Security Officer, will facilitate this being achieved.</p>	<p><b>Issue Addressed</b> – Firewalls across Council Jan 2017</p>

Recommendation	Priority Level	Management Response	Position at March 2017
ICT and Information Governance staff should review whether documented data protection protocols or confidentiality agreements are in place and required for third party contractors who access Council's networks.	3	Agreed. This will be communicated to effected HoS to ensure that their respective suppliers adhere to this direction. The enhanced ICT Structure, in the form of a Security Officer, will facilitate this being achieved.	<b>Issue being Addressed</b> – estimated completion April 2017
ICT should periodically review the firewall policies to ensure that they remain correctly set.	3	Agreed. The enhanced ICT Structure, in the form of a Security Officer, will facilitate this being achieved.	<b>Issue Complete Jan 2017</b>
A documented Business Continuity and Disaster Recovery Plan should be developed for ICT to provide clear guidance on actions in the event of a business interruption or disaster. In addition, work to develop the disaster recovery site at Ballymoney should be completed as soon as practicable to ensure a smooth transition in the event of any issue affecting the main Causeway Coast & Glens Council severs in Coleraine.	1	Agreed. This will be implemented as a matter of priority. The initial scoping exercise will identify the required resources.	<b>Issue being Addressed</b> – estimated completion April 2017



### 3.8 Review of Partnerships

Recommendation	Priority Level	Management Response	Position at March 2017
<p>Council should, in consultation with all Heads of Service, prepare a register (or registers) of all existing partnerships including such details as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Partnership name</li> <li><input type="checkbox"/> Type of partnership</li> <li><input type="checkbox"/> Category of partnership e.g. limited company</li> <li><input type="checkbox"/> Council's role</li> <li><input type="checkbox"/> Names of Councillors and Officers involved</li> <li><input type="checkbox"/> Date partnership began</li> <li><input type="checkbox"/> Date of approval at appropriate Council level</li> <li><input type="checkbox"/> Date partnership agreement signed</li> <li><input type="checkbox"/> Date partnership agreement will expire</li> <li><input type="checkbox"/> Location of partnership files</li> </ul>	2	Agreed. This will be set as an objective for Business Support for 2017	<b>Issue being Addressed</b> – Under review, structure not confirmed - Sept 2017

Recommendation	Priority Level	Management Response	Position at March 2017
<p>Council should develop guidelines for partnership working which should contain as a minimum:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Definitions of partnership</li> <li><input type="checkbox"/> Procedures to be followed and checklists to be used when creating new Partnerships; e.g. assessing and getting approval at appropriate levels of Council, putting appropriate procedures in place for oversight and payment of any funding, defining roles and responsibilities of Council officers and members</li> <li><input type="checkbox"/> Guidance (and checklists) for risk assessment</li> <li><input type="checkbox"/> Pro forma(s) for agreement(s)</li> <li><input type="checkbox"/> Procedures to be followed and checklists to be used when managing existing Partnerships</li> <li><input type="checkbox"/> Guidance (and templates) on monitoring and reporting progress of partnerships</li> <li><input type="checkbox"/> Protocol for Elected Members involved in any work with Partnerships</li> <li><input type="checkbox"/> Protocol for employees involved in any work with Partnerships</li> <li><input type="checkbox"/> Procedures to be followed and checklists to be used for an annual review of existing partnerships</li> </ul>	2	Agreed. I will outsource the requirement to achieve a 'clean sheet' approach for the development of a Council Partnership Policy.	<b>Issue being Addressed – 30<sup>th</sup> Sept 2017</b>
<p>Appropriate training on partnership engagement and management should be provided for Council members and staff.</p>	3	Agreed. Training is required to brief / train Members and Officers on Finding No. 2, Partnership Guidelines.	<b>Issue being Addressed – Dec 2017</b>
<p>Formal agreements should be put in place for all existing and new partnerships in a timely manner i.e. before any activities occur and before the expiration of any existing agreements.</p>	2	On completion of Finding No. 1 Officers will review all existing arrangements: firstly defining the purpose of the partnership.	<b>Issue being Addressed – Dec 2017</b>
<p>Each partnership should have a partnership file, with a checklist of information that should be retained. The information can be retained in hardcopy within</p>	2	On completion of Finding No. 1 all existing documentation will be reviewed and a system will be	<b>Issue being Addressed – Dec 2017</b>

Recommendation	Priority Level	Management Response	Position at March 2017
the file or the location of the hardcopy or softcopy should be noted.		prepared for future record retention.	
Each partnership should undergo a risk assessment; this can be facilitated by developing a partnership risk checklist. This should be completed for existing and proposed partnerships and retained within the partnership file. This should also be included as part of the information provided when making any recommendation to Council to approve or extend a new partnership	3	Agreed.	<b>Issue being Addressed – Dec 2017</b>
Council should review the practice of making payments to partnerships in the absence of an up to date partnership agreement in place and provision of a progress report.	3	Agreed. In the case of Safer Coleraine, this is not a partnership agreement per se, it is a service provision. The CCTV provision is currently under review.	<b>Issue being Addressed – Sept 2017</b>
The activities and impact of each partnership must be appropriately monitored by Council	3	Ongoing work will be presented to SMT/Committee/Council aligned to Council's Corporate Plan and Draft Partnership Policy, Finding No. 2.	<b>Issue being Addressed</b>

### 3.9 Planning

Recommendation	Priority Level	Management Response	Position at March 2017
<p>For consistency with other departments, Planning staff should use the Cheque Requisition Form to request refunds from Finance. This would ensure sufficient evidence of authorisation of the refund prior to the refund being made and would remove the need for the Head of Planning to sign the green slips after the refund has been made.</p> <p>In addition, as the Head of Planning is the only Planning staff member to have delegated authority under Council's financial delegated authority list. Consideration should also be given to designating the PPTO (and SPTOs if appropriate) with a more limited level of authority (ie below £1k as for other managers) to be able to approve the Cheque Requisition Forms for smaller refunds.</p>	3	<p>Management accepts the recommendation. Planning staff will commence using the Cheque Requisition Form to request refunds from Finance. The CRF will be accompanied by relevant documentation to identify the planning application; amount of refund and reason for refund. Management agree that the 2 PPTOs within Planning will have delegated authority to authorise refunds below £1k.</p>	<p><b>Issue Addressed</b> - Staff now using the Cheque Requisition Form to request refunds from Finance.</p> <p><b>Issue Addressed</b> - Notification was given PPTO grades authorising them to approve payments up to a limit of £1k on 7 February 2017.</p>
<p>Planning case officers should ensure that any refunds due and identified at validation stage or during monitoring checks are processed in a timely manner.</p>	3	<p>Management accepts the recommendation. Planning Staff will be reminded of the necessity of ensuring that refunds are identified and actioned at validation stage and fee checklist completed and signed.</p>	<p><b>Issue Addressed</b> - Issue raised by Head of Planning during Staff Team Brief on 29<sup>th</sup> November 2016, in that refunds are identified and actioned at validation stage and the fee checklist completed and signed as required. Admin will run letter and pro forma after Case Officer, Line Manager and SPTO have signed and authorised refund. Staff reminded again by Head of Planning during Team Brief on 23<sup>rd</sup> February 2017.</p>
<p>Planning staff should be reminded to ensure that Development Management checklists are fully completed for each action, planning fee checklists are fully completed and signed once the Planning Portal has been checked or if the need for a refund is identified, and copies of emails / notes of telephone conversations retained where</p>	3	<p>Management accepts the recommendation. Management will remind Planning staff of the need to ensure that all checklists are correctly dated, initialled and completed on all planning applications in a timely basis.</p>	<p><b>Issue Addressed</b> - Issue discussed on receipt of Audit Report with Senior Management and staff briefed through team meeting on 29<sup>th</sup> November 2016. Importance of proper record keeping stressed to all staff. Staff reminded again by Head of Planning during Team Brief on 23<sup>rd</sup> February 2017</p>

Recommendation	Priority Level	Management Response	Position at March 2017
these relate to queries on, for example, a Planner's opinion on a development point.		Management will also remind staff of the need to retain notes of telephone calls, emails relating to discussions in an application on file.	
Consideration should be given to allocating Planning with a small cash float so that administration staff can easily provide change for applications or copy documents paid in cash.	3	Management accepts the recommendation. A small cash float of £20 will be allocated to Planning for the provision of change to customers.	<b>Issue Addressed</b> - Finance have agreed the float of £20 for the provision of change to customers. This is now in place.
For the purposes of the audit trail, staff should input the date of receipt of additional fees in ePIC as the date actually received, rather than the same date as the receipt of the initial fee.	3	Management accepts the recommendation. Management will remind staff of the necessity to accurately record in ePIC the actual date additional payment received.	<b>Issue Addressed</b> - All staff informed of need to record actual date of additional fee during Team Brief on 29 <sup>th</sup> November 2016 by Head of Planning on receipt of Audit Report. Planning staff also reminded to amend Fee Screen when additional fee is identified in order to allow Admin staff to input correct date when additional fee received. This is important as the system will default to the original date of (first) fee received if it is not updated on the day the additional fee is received. Admin staff have responsibility for inputting data and will take responsibility for liaising with Case Officers to ensure that Fee Screens are up to date in each case, thereby minimising any potential problems with the system at a later date. Staff reminded again by Head of Planning during Team Brief on 23 <sup>rd</sup> February 2017.

### 3.10 Review of Performance Improvement Targets

Recommendation	Responsible Officer	Management Response	Position at March 2017
<p><b>PERFORMANCE OBJECTIVE 1</b></p> <p>Redesign of the caravan site management system across the Council to improve the service to customers.</p>	Caravan Parks Manager	<p>Infrastructure works completed by November 2016</p> <p>One single booking system in place by December 2016. One single licence agreement for static caravans by December 2016</p>	<p><b>Issue Addressed</b> - Sign-off of works by Estates Branch, and Parks fully operational. All 2017 online bookings made were through the single system. All 2017 occupiers of static caravans signed the same Licence Agreement. This has recently been audited by the NIAO; so evidence has not been examined during this review.</p>
<p>Develop an effective grant funding hub to support financial allocations to customer groups across the Council.</p>	Funding Unit Manager	<p>Introduce a new software package. Train staff and customers on how the package operates.</p>	<p><b>Issue Addressed</b> - Funding hub live 1<sup>st</sup> December 2015. Training for staff and customers complete January 2016. Guidance available online via the portal. The hub is being used for grant applications 2016/17. A customer satisfaction survey is planned for 2017.</p> <p>Demonstration of system during this review. Report of grant applications and progress from the funding hub. On Target Pending customer satisfaction survey</p>
<p>To support businesses by improving the payment process to creditors</p>	CFO	<p>Review of systems and procedures to ensure prompt payment of creditors. Monitor and review on a monthly basis. 90% of invoices to be processed within 30 calendar days</p>	<p><b>Issue Addressed</b></p>
<p>To improve the customer experience by providing an effective wifi service at the Council caravan parks</p>	Head of ICT	<p>Identify level of wifi provision required. Tender process and installation. Monitor and review. Wi-Fi to be introduced at Juniper Hill and Carrick Dhu caravan parks by August 2016</p> <p>80% customer satisfaction level</p> <p>Wi-Fi is now available at both</p>	<p><b>Issue Addressed</b> - Wi-Fi is now available at both caravan parks. Wi-Fi usage reports were available from both caravan Parks. Customer satisfaction is currently being measured through feedback from the residents' associations. On Target Pending a documented record of customer feedback. Notes of feedback from the residents' associations should be maintained. Survey to be completed April 2017.</p>

Recommendation	Responsible Officer	Management Response	Position at March 2017
		<p>caravan parks. Wi-Fi usage reports were available from both caravan parks. Customer satisfaction is currently being measured through feedback from the residents' associations. On Target Pending a documented record of customer feedback.</p>	
<p>Introduce management software for incident reporting to reduce accidents to customers</p>	<p>Health &amp; Safety Officers</p>	<p>Procure new software for incident reporting. Train staff in the use of the system. Use the information captured to address areas of risk and introduce control measures. Monitor and review progress being made. Increase the number of accidents reported by 50% Increase the number of near misses reported by 50% Increase the number of identifiable remedial actions arising from investigations following accident/incident Reports. Reduce the number of accidents occurring by 20%</p>	<p><b>Issue Addressed.</b></p>
<p>Campaign to reduce instances of dog fouling</p>	<p>Head of Health and Built Environment</p>	<p>Pilot area to be chosen. Wardens tasked with patrols. Dog foul to be identified via paint. Reduction in dog fouling across the pilot area between July 2016 and March 2017.</p>	<p><b>Issue Addressed</b></p>

Recommendation	Responsible Officer	Management Response	Position at March 2017
		Improved customer satisfaction levels	
<p><b>PERFORMANCE OBJECTIVE 2</b></p> <p>To develop and implement an Estates Strategy to provide a more effective and efficient geographical allocation of Council non front line services to meet customer needs</p>	<p>Head of Corporate Performance and Compliance</p>	<p>Design a new strategy to align non front line services with customer needs. Produce a detailed project plan to facilitate the various re location Requirements. Move relevant staff as required. Market and advertise the changes to customers. Environmental Services move to be completed by October 2016 Planning staff moved to Cloonavin by February 2017</p>	<p><b>Issue Being Addressed</b> - Estates Strategy Workshop 7<sup>th</sup> October 2015 Estates Strategy Objectives agreed. Condition Report for each building July/August 2015 Project Identification Document Phase 1 April 2016; with project overview and completion date March 2017 Estates Strategy project plan for each building. The lease for County Hall has been extended by 6 months (to September 2017). A revised Estates Strategy was prepared for CP&amp;R Committee and approved by Council on 22<sup>nd</sup> November 2016. A report for the P&amp;R Committee on 16 November provided an updated first phase of the Estates Strategy for Council approval; it anticipates completion of the planning staff move by September 2017. Steps to facilitate this move are the new targets for 2016/17.</p> <p>Phase 1 of the Estates Strategy was approved by Council on 22<sup>nd</sup> November 2016. The targets relating to the revised Estates Strategy have been amended. Close monitoring and regular reporting of these revised targets will be required to minimise the risk of non achievement in 2016/17.</p>
<p><b>Statutory Waste Performance Indicators</b></p> <p>Target 20,386 Tonnes (92.7% utilised)</p>	<p>Head of Operations</p>		
<p>Statutory Economic Development Performance Indicators. The number of jobs promoted through business start-up activity 147</p>	<p>Head of Prosperity and Place</p>	<p>The figure in the performance plan is 147. Invest NI then uses a standard rate (%) for the</p>	<p><b>Issue being Addressed</b> - The figure in the performance plan is 147. Invest NI then uses a standard rate (%) for the number of jobs per business plan. The target for jobs for 2016/17 by Invest NI was 125. As per Invest NI</p>



Recommendation	Responsible Officer	Management Response	Position at March 2017
		<p>number of jobs per business plan. The target for jobs for 2016/17 by Invest NI was 125.</p> <p>As per Invest NI data and statistics (at 31<sup>st</sup> August 2016) Council is currently at 83 jobs created which equals 66% of the Invest NI target of 125 for 2016/17.</p> <p>(According to the Head of Prosperity Council may reach 100 jobs by the end of the year)</p>	<p>data and statistics (at 31<sup>st</sup> August 2016) Council is currently at 83 jobs created which equals 66% of the Invest NI target of 125 for 2016/17. (According to the Head of Prosperity Council may reach 100 jobs by the end of the year)</p>

## Appendix I: Hierarchy of Findings

This audit report records only the main findings. As a guide to management and to reflect current thinking on risk management we have categorised our recommendations according to the perceived level of risk. The categories are as follows:

**Priority 1:** Major issues which require urgent attention and the implementation of agreed audit recommendations in the short term.

**Priority 2:** Important issues which require immediate attention and the implementation of agreed audit recommendations in the short to medium term.

**Priority 3:** Detailed issues of a less important nature which require attention and the implementation of agreed audit recommendations in the medium to long term.

## Appendix II: Our Approach and Staff Interviewed

Our audit fieldwork comprised:

- Reviewing progress against recommendations via discussions with key staff
- Examining relevant documentation
- Testing controls and accuracy of records.

The table below shows the staff consulted with and we would like to thank them for their assistance and co-operation.

<b>Name</b>	<b>Job title</b>
Lindsay Clyde	Financial Accountant
David Wright	Chief Finance Officer
Stacy McClarty	Business Support Officer (Coleraine)
Brian Tohill	Sport and Wellbeing Area Manager (Central)
Steve McCartney	General Manager – Caravan Parks
Brian Edgar	Head of Health and Built Environment
Elizabeth Beattie	Head of Policy/Equality
Brid Lofthouse	Head of OD/HR
Linda McKee	Information Governance Officer
Patrick McColgan	Head Of ICT
June McDowell	Business Support and Administration Manager
Denise Dickson	Head of Planning
Moira Quinn	Director of Performance
Stephen McMaw	Head of Corporate Performance and Compliance
John Anderson	Civic Facilities Manager