

**INTERNAL AUDIT FOLLOW UP OF
RECOMMENDATIONS REPORT**

Northampton Borough Council

August 2020

IDEAS | PEOPLE | TRUST

BDO

Summary

2018/19

	Total Recs	H	M	L	To follow up	Complete		Overdue		Removed		% Complete
						H	M	H	M	H	M	
Building Control	7		7		0		6				1	100
Cash Handling	6	3	3		0	2	3			1		100
Digital Strategy	3		3		0		3					100
Housing Rents	3		3		0						3	100
Major Cap. Projects	8	1	7		0		5			1	2	100
Member-Officer	12		12		10		10		2			83
People	11	7	4		1	7	4					100
Procurement	7	2	5		1	2	3		1		1	86
Senior Mgmt. Restructure	4		4		0		4					100
Temp Accom.	9	3	6		2	3	5		1			89
	70	16	54		14	14	43		4	2	7	94

2019/20

	Total Recs	H	M	L	To follow up	Complete		Overdue		Removed		% Complete
						H	M	H	M	H	M	
Contract Mgmt.	1		1		1				1			0
Cyber Security	3		3		2				2			0
Enterprise Zone	7		7		0		7					100
GDPR	2	1	1		1		1		1			50
Health & Safety	6	2	4		0	2	4					100
Planning & S106	2		2		1		2					100
	21	3	18		5	2	14		4			76

Summary

FOLLOW UP GOING FORWARD - BDO RECOMMENDATIONS

Following the issue of reports, all due High and Medium recommendations will be followed up within this report

RECOMMENDATIONS

- 19 recommendations are due for follow-up with recommendations due prior to the end of **August 2020**
- Previous recommendations may simply have a revised date that is post this Committee and therefore, will be picked up at the next Committee

Of the 19 recommendations we followed up on:

- One High and 8 Medium recommendations were fully implemented by the Council and we received sufficient evidence to support implementation of these recommendations
- 8 recommendations were incomplete (1 High, 7 Medium) and the due date has now been revised more than twice on these recommendations, therefore they are overdue
- We appreciate that there had been progress on a number of the overdue recommendations at our previous follow up which the Council were unable to implement because of the disruption caused by the COVID-19 pandemic. Whilst this has stretched the Council's resources and meant that the 'way of working' has had to be changed, we will be following up on the overdue recommendations prior the next Audit Committee and would expect progress to be made towards implementing these.

FOLLOW UP PROCESS

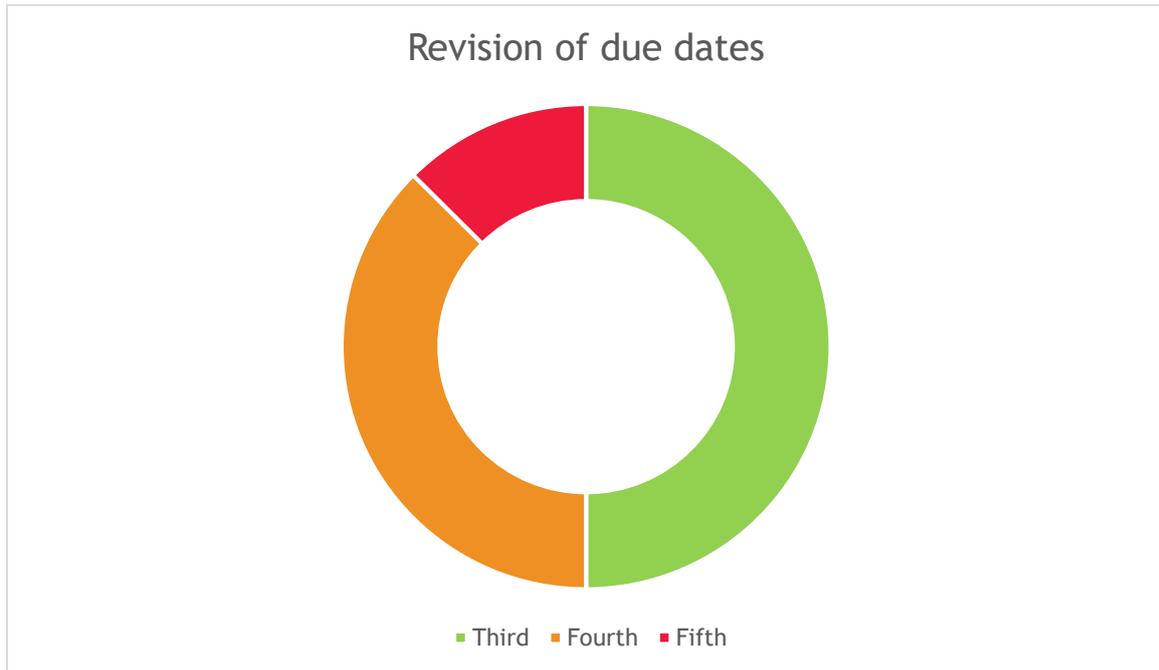
As part of the follow-up process we issued all recommendations due for implementation on or before August 2020 on 6 May 2020. Recommendations due were sent to all responsible officers and the corresponding heads of service. We gave responsible officers 6 weeks to respond. We subsequently chased officers throughout June 2020 and issued further chasers in July 2020.

We are required to escalate non responses and/or recommendations with several revised due dates to the Corporate Management Board (CMB). All responsible officers responded to our follow up within the allotted time-frame so we were not required to escalate non responses to CMB in this follow up.

For all incomplete recommendations, we will:

1. Continue to emphasise to staff to be realistic about the implementation dates when completing their management responses at the completion stage of each internal audit review
 2. Issue the recommendations tracker to all the relevant Heads of services on a monthly basis from the December audit committee onwards
 3. Issue reminder emails 6 weeks prior to the follow up review to ensure timely completion of each recommendation.
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NUMBER OF TIMES DUE DATES HAVE BEEN REVISED



The Chart shows the amount of times that due dates have been revised for recommendations from 2018/19 and 2019/20 reviews that we have followed up to August 2020. One recommendation due date has been revised for the fifth time and three have been revised four times, two of which are recommendations arising from the Member-Officer Protocols review which was completed in January 2019.

Recommendations: Complete

Audit	Recommendation made	Priority Level	Manager Responsible	Due Date	Current Progress
2018/19. People	The Council should complete the Workforce Monitoring Report for 2018/19 and report on website	High	Governance & Risk Manager	30/09/2019 31/10/2019 29/02/2020 31/03/2020	<p>Council Comments: The Workforce Monitoring Report's for 2018/19 and 2019/20 have both been uploaded onto the Council's website.</p> <p>IA Comments: We reviewed the website and confirmed that they were accessible on this platform.</p>
2018/19. Temporary Accommodation	All TA and prevention officers and managers should receive specialist training on conducting interviews with applicants that may be dealing with sensitive issues to ensure they are capably equipped to identify and support the TA application for vulnerable individuals. The attendance for this training should be documented and the material retained for staff to refer to at a later date	Medium	Housing Advice & Options Manager	31/10/2019 29/02/2020 30/04/2020	<p>Council Comments: The Housing Options Manager has developed performance framework documents (including Induction skill matrix) for the managers to use. The expectation within the framework that all the team members should receive at least one 1-2-1 and a case management meeting in a month from their line manager. The Housing Options Manager is in liaison with NHAS (Shelter Training) to identify relevant homelessness and interview techniques training for the whole team.</p> <p>IA Comments: We reviewed the skills matrix and performance framework and were satisfied that this fulfilled the recommendation and that training was made available to staff.</p>
2019/20. Planning & Section 106	Additionally, the Council should review a selection of older schemes, i.e. where the Agreement was signed before 2010, and trace any evidence to support the spending of the S106 income,	Medium	Director of Planning	30/11/2019 31/03/2020	<p>Council Comments: The Planning team have reviewed some a selection of older Section 106 agreements that the Council have had in place with developers and ensured that the income was received and spent.</p>

	focussing on the highest value and/or highest risk schemes. All evidence of expenditure found should be retained in Civica				IA Comments: We were provided with 3 reviews undertaken by the Council where there was supporting evidence provided by Finance for how this money was spent.
2018/19. Member-Officer Protocols	Convene an Officer-Member working group to focus on areas where disparity between Member perception of current roles, and Officer perception of current roles differ most - i.e. those highlighted by the survey for this review	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	Council Comments: The Standards Committee received the report prepared by the Member-Officer Working Group and noted the contents. It was agreed by the Committee, based on the comments of the Working Group to recommend to Council to implement the Protocols document. IA Comments: We reviewed the Standards Committee minutes on 29 June 2020 and was satisfied that this recommendation was complete.
2018/19. Member-Officer Protocols	When updating the Council's Member-Officer protocol, focus on providing clarity on those areas where the survey undertaken for this review suggests that aspirations set out in the current protocol do not match reality	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	Council Comments: The updated Member-Officer Protocols provides detail on the importance of Officers acting independently and members not applying pressure on Officers to change their professional advice/opinion. Particular reference is made in Section 3.10 to Members not having any communication with Officers that may bring the Council into disrepute. IA Comments: This recommendation has been completed, there is sufficient information about the Member-Officer relationship.
2018/19. Member-Officer Protocols	When updating the Council's Member-Officer Protocol, the Council should incorporate a description of a Member's role in the Member-Officer Protocol, building on the description	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	Council Comments: The updated Member-Officer Protocols provides a description of the role of a Member as identified by the Constitution. IA Comments:

	currently set out in Article 2 of the Council's Constitution				The descriptions of the Member's role was sufficient.
2018/19. Member-Officer Protocols	When updating the Council's Member-Officer Protocol, draw on expectations of Members and Officers highlighted for this review, and undertake a wider engagement exercise of Members and Officers to determine expectations which are bespoke to the needs and views of the Council	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	<p>Council Comments:</p> <p>The updated Member-Officer Protocols builds on the expectations of Officers to act independently and provide support to all political Groups. Furthermore, the Protocols are clear on the role of Members and the limitations in how they should act, i.e. not to put pressure on Officers.</p> <p>IA Comments:</p> <p>We reviewed the Protocols and was satisfied that there was clarity around the expectations of Members and Officers.</p>
2018/19. Member-Officer Protocols	The updated Member-Officer Protocol should make recommendations more understandable by couching them in everyday examples. For example "Councillors should not walk the floors of the Council and instruct Officers to undertake certain tasks".	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	<p>Council Comments:</p> <p>In Section 3.10 of the Protocols the wording "Members must not put inappropriate pressure on employees (in particular junior employees) and must ensure that all communication between them (including written communication) does not bring the Council into disrepute, or lead to the breakdown of mutual trust, respect and courtesy in Member/employee relations".</p> <p>IA Comments:</p> <p>We are satisfied that the statement is clear that Members should not out undue pressure on Officers.</p>
2018/19. Member-Officer Protocols	Hold a joint Member-Officer session focussed on understanding respective expectations of one another. This would focus on developing an improved culture to underpin the refreshed Member-Officer Protocol	Medium	Monitoring Officer	31/05/2019 29/02/2020 30/04/2020 31/08/2020	<p>Council Comments:</p> <p>A Member-Officer Working Group was set up to fulfil this requirement. The Member-Officer Protocols have been updated following comments from this working group.</p> <p>IA Comments:</p>

					We are satisfied that the recommendation has been implemented.
2018/19. Member-Officer Protocols	When updating the Member-Officer Protocol, the Council should introduce a clear process for complaints by Officers about the conduct of individual Members. Such a process exists in protocols held by other Councils which were reviewed as part of this audit. This process should set out who Officers can raise complaints with, provide an appeal route if they are not happy with how this complaint has been treated, and a method for logging complaints received. The updated Protocol should also state that Group Leaders have a responsibility for the behaviour of their Group Members towards Officers	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	<p>Council Comments: The Member-Officer Protocols makes reference to the <i>Arrangements for dealing with allegations of breaches of the Northampton Borough Council Members' Code of Conduct and of Codes of Conduct adopted by Parish Councils</i> which outlines the employee complaint process in full.</p> <p>IA Comments: Reference to the Code of Conduct is adequate to outline a clear and appropriate complaints escalation procedure.</p>
2018/19. Member-Officer Protocols	Update the Member-Officer Protocol to express that Members are entitled to receive a timely response to enquiries on behalf of ward residents, and agree with Members what this timescale might be	Medium	Monitoring Officer	31/05/2019 31/12/2019 30/04/2020 31/08/2020	<p>Council Comments: Within the Acceptable Behaviours section of the updated Member-Officer Protocols it has given "Prompt responses to enquiries" as an example.</p> <p>IA Comments: This recommendation has been implemented.</p>

Recommendations: Overdue

These recommendations have been marked as overdue as they have previously revised their implementation date. Therefore, they have now missed at least two implementation dates.

Audit	Recommendation made	Priority Level	Manager Responsible	Due Date	Current Progress
2018/19. Procurement	The Council should give procurement and contract refresher training for staff involved with high-value contracts	Medium	Monitoring Officer & Chief Finance Officer	30/06/2019 31/08/2019 31/10/2019 31/01/2020 31/03/2020 30/09/2020	<p>Council Comments: Due to the COVID-19 pandemic the Council were unable to complete the training sessions on the originally planned dates and have therefore re-scheduled to when the office re-opens. The training had originally been planned for 30 March - 2 April 2020</p> <p>IA Comments: We have provisionally revised the due date to September 2020 however we accept the implementation of this recommendation is contingent on face-to-face training being possible.</p>
2018/19. Temporary Accommodation	The Spend to Save Policy should be updated with limits on funds that can be granted/loaned to clients. Once updated, the Council should review the funds allocated to the Scheme and assess whether they are adequate	Medium	Housing Advice & Options Manager	31/10/2019 29/02/2020 31/05/2020 31/08/2020	<p>Council Comments: New Homeless Reduction Manager and Social Lettings Manager have now been in post since April 2020. They are now reviewing Spend to Save Policy and in line with new private sector property suitability criteria. At the same time they will review the funding limits, what checks need to be carried out and who should authorise the payment.</p> <p>IA Comments: The implementation of the Spend to Save Policy and the progress of the checks will be followed up at the next Audit Committee.</p>
2018/19. Member-Officer Protocols	Run an organisation-wide training programme on the Protocol once it has been refreshed - cascading training down through	Medium	Monitoring Officer	31/05/2019 29/02/2020 30/04/2020 31/08/2020	<p>Council Comments: The draft protocol was to be considered by Standards Committee on 23 March, however, in common with other face-to-face</p>

	political groups, Heads of Service and to CMT meetings run by Heads of Service				meetings, this was cancelled due to the COVID-19 restrictions. The Council are awaiting confirmation from the Democratic Services team that the appropriate software licences are in place so that they can commence testing for compatibility with the 'flexibility regulations'. Virtual meetings will then be implemented to replace postponed meetings. IA Comments: We appreciate the disruption caused by the COVID-19 with face-to-face meetings. This will be followed up at the next Audit Committee.
2018/19. Member-Officer Protocols	When holding training for Members on the Officer-Member Protocol, the importance of appropriate tone, and not influencing Officer reports, should be emphasised through a series of scenario-based exercises to reduce the likelihood that either element of the Protocol is unintentionally breached	Medium	Monitoring Officer	31/05/2019 29/02/2020 30/04/2020 31/08/2020	Council Comments: The draft protocol was to be considered by Standards Committee on 23 March, however, in common with other face-to-face meetings, this was cancelled due to the COVID-19 restrictions. The Council are awaiting confirmation from the Democratic Services team that the appropriate software licences are in place so that they can commence testing for compatibility with the 'flexibility regulations'. Virtual meetings will then be implemented to replace postponed meetings. IA Comments: We appreciate the disruption caused by the COVID-19 with face-to-face meetings. This will be followed up at the next Audit Committee.
2019/20. GDPR	Management should agree a contractual addendum as part of the outsourced agreement held with LGSS for the provision of	High	Data Protection Officer	30/11/2019 31/03/2020 30/09/2020	Council Comments: In light of the issues/uncertainty surrounding LGSS at the moment, the PDA extension has not been

	revenues and benefits				signed. If and when that happens this will be addressed then. IA Comments: We appreciate there is uncertainty with the LGSS and that this will be followed up at the next Audit Committee
2019/20. Contract Management	The Council should ensure that the PDA extension with LGSS is signed by both parties	Medium	Chief Finance Officer	30/11/2019 31/03/2020 30/09/2020	Council Comments: In light of the issues/uncertainty surrounding LGSS at the moment, the PDA extension has not been signed. If and when that happens this will be addressed then. IA Comments: We appreciate there is uncertainty with the LGSS and that this will be followed up at the next Audit Committee
2019/20. Cyber Security	Regular internal cyber security risks assessments are performed to identify cyber security threats. There is also a need to ensure alignment between IT risks identified by the Council on the Corporate Risk Register and those on the IT Risk register. The IT risk register may be further sub-divided into cyber security risks and other IT risks until the cyber security risk management becomes embedded	Medium	ICT Service Delivery Client Manager	31/12/2019 30/04/2020 30/09/2020	Council Comments: There has been progress on alignment of IT risks identified on the Corporate Risk Register and the IT Risk Register but the Council are awaiting final confirmation from LGSS IT on this. IA Comments: This will be followed up at the next Audit Committee.
2019/20. Cyber Security	A scheduled plan for major incident response scenario testing should be developed and approved by the Digitalisation, Cyber security and Data Protection Group. Regular comprehensive	Medium	ICT Service Delivery Client Manager	31/12/2019 30/04/2020 30/09/2020	Council Comments: This process was delayed by the COVID-19 pandemic and will not be completed until business as usual returns following the pandemic. IA Comments:

cyber security
testing should be
included in the plan

This will be followed up at
the next Audit Committee.

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