ref	Audit Title	Finding Heading	Finding Rating	Agreed Action	Action Status	Responsible People	Date by:	Revised date	Progress Update
1	Data Protection	Following a recent breach of the data protection policy, a "Data Protection Overview Audit" was undertaken by independent consultants, Information Management Training Services Limited (IMTS) in April 2014. The outcome of the review raised several recommendations to improve the management of data protection. At the time of our internal audit review the IMTS report had not been finalised and as such recommendations had not been agreed or an action plan to implement recommendations prepared. We reviewed the draft recommendations made in the IMTS report with the Senior Information Governance Officer who confimed that a number of these recommendations in relation to the following areas are still outstanding: - Awareness and training - Retention schedule for documents - Vulnerability to one individual officer - External contractors responsibilities	Medium	The IMTS report should be finalised and an agreed action plan developed to address the recommendations made.	Closed	David Taylor	30/06/2015	25/05/18	Dedicated GDPR Data Protection Officer has been in post since September 2017. A revised training and awareness programme will be implemented from April 2018 in respect of the new GDPR and updated Data Protection Policy. Retention schedule for all documentation is being reviewed department by department, as part of the corporate roll out of EDRMS. Short term resilience from Partner agencies, succession planning to be implemented by 31st December. External contractors responsibilities will be reviewed as part of the contract management review. More robust wording and guidance around Safe Haven and Clear Desk will be included in the Data Protection Policy when it is drafted. Estimate date for this is draft by January 2018, with approval by Easter 2018. David Taylor to action.
2	Data Protection	The Senior Information Governance Officer keeps a log of all the Data Sharing agreements in the Council. Before access is given for a data sharing agreement, it is required to be authorised by a senior member of staff. We tested a sample of 5 data sharing agreements and noted a lack of evidence of authorisation for all five cases. It was also identified that documents were not kept in a file together and the Senior Information Governance Officer did not have the signed copies of the final agreement that was issued. The Data Protection Policy states that once an agreement has been logged on the register it is required to be reviewed every 12 months. During the testing of 5 data sharing agreements there was an absence of timely review in all cases.	Medium	During the audit the Senior Information Governance Officer took immediate action to organise the files so that information was accessible in a grouped folder. He also updated the log to include additional columns to prompt documentation of future agreements. A review should be carried out of all agreements currently in place to find all documentation relating to the agreement and store it together in a central folder.It is important that the SIGO is in full knowledge of all Data sharing agreements within the Council. An annual review of each of the agreements should be carried out to ensure that they are still in place and to update any areas where the conditions of the sharing agreement have changed. For major changes these should require a new agreement to be submitted and authorised.	Open	David Taylor	30/06/2015		Working with NCC and other partner organisations to update the spreadsheet. The Governance Support Officer is working with the Data Protection Officer on this.

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3	Data Protection	The process for disposing of hard copy information varies across departments. Some departments have their own shredders and dispose of their documents themselves. Other departments will collect the information and then send to be disposed. In these instances open bags of confidential waste are left in the Council offices until they are filled and then transported for disposal.	Low	The Council should install confidential waste bins to ensure that all confidential information is destroyed securely. There should be a consistent approach across the Council regarding the disposal of hard copy confidential documents.	Open	David Taylor	31/07/2015	31/12/17	Facilities did get quotes for secure bins, and costs were communicated to Management Board. No further action has been taken at this time.	23/06/2017 Update from the Head of Customer and Cultural Services: " I have had the opportunity to discuss with FM and it would be cost prohibitive and rather than implement this we would look to improve the current policy around secure waste disposal. The DPO is in the process of updating the clear desk policy so I would suggest that this is updated to ensure that all staff lock confidential waste away securely overnight or when the offices are unoccupied. The only people with access to the staff areas of the Guildhall are NBC employees with MAC passes who have all received training in Data Protection so the risk is low and managed in the way above reduces the risk further. I would further suggest that we review this periodically to ensure there are no breaches or issues". It was also suggested and approved by the Head of Customer and Cultural Services that an email asking staff to ensure that they lock secure shredding bags up over night, to ensure they are secure be sent to all staff by the Comms team.
4	Economic development and regeneration	If there is a change in the Project Manager, they have the opportunity to meet and discuss their project with the LGSS Project Support to ensure they are compliant with the relevant policies, legislation, required documents and are working in accordance with the Council's policies. However, this is not a mandatory approach and requires the new Project Manager to actively seek this support.	Low	Where new project managers are appointed there should be a formal process of reviewing existing documentation and explaining the Council's processes to individuals undertaken by the Transformation Project Manager.	Open	Alice Turrell,Glenn Hammons,Ian Gray,John Dale	28/02/2017	31/10/17	Changing Project Manager... Each of the Directors is aware of the Project Support available which is now provided by NBC not LGSS. This will be fully detailed in the new programme Project Management Framework that has a target date of September 2017. As part of this framework it is intended that a project manager's virtual network will be established, which will support all PM's in a proactive rather than reactive manner, and will ensure that consistency is applied through internal controls defined within the framework. Update supplied by Alice Turrell.
5	Economic development and regeneration	Project summaries are maintained for individual projects which detail project leads, current status and whether an appropriate monthly highlight report or other progress report has been submitted and reviewed. There is no overall document to summarise all projects currently underway within the Council. Having such a document would provide the opportunity to review the department progress as a whole and ensure all relevant documents have been prepared in compliance with the established process.	Low	A checklist should be maintained, documenting all projects, to ensure all required documents are completed along with dates they are prepared and reviewed to ensure continued compliance with the established process.	Open	Ian Gray,John Dale	30/06/2017		Project Summaries ... A project register is maintained on a monthly basis and is reported to the Northampton Alive Board. This details the individual project, the project leads the current status, and whether a highlight report has been submitted for that past reported month. It also reports the progress for that reporting period. If there were any corporate risks or corporates issues reported by the board, this would initiate a exception report, which is cascaded up to management board for guidance and decision making. the Project register is prepared within the service, a governance challenge undertaken by project support and passed to the Director of Regeneration Enterprise and Planning. No overall documents... There is currently still no overall document detailing all of the projects undertaken by the council. This is an action as part of the governance action plan where there will be a programme and project management document produced as part of which one of the key principles will be maintaining a portfolio register of all of the Council's projects, the target date for this is September 2017.

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6	Food Standards Agency	1. Ensure that all future service planning documents include a clear explanation of all the demands on the Service, including details of the intervention programme for the year taking into account any backlog of overdue interventions and unrated establishments from previous years. 2. Carry out a suitable performance review against the Service Plan at least once a year and submit it for approval to either the relevant member forum or, where approval and management of service plans has been delegated to senior officers, to the relevant senior officer.	Low	1. Rewrite service plan to accurately reflect all the demands on the service including the intervention programme for the year taking account of the backlog of overdue interventions and unrated establishments from previous years. 2. Set up an annual review of the service plan to take place by the beginning of September each year ahead of the budget build process with the aim of developing the new service plan ahead of April the following year.	Open	Ruth Austen	01/09/2017	30/11/17	Action taken to date: - reviewed current service plan. - Reviewed food premises database and identified level of resource required to address backlog of interventions and unrated establishments. - Dates for review take account of budget cycle. - Put review meeting into Directors diary. 06/10/2017 - work is progressing on the update of the service plan and it is proposed that a draft of the updated service plan will be presented to our Director by the end of October. There has been a delay in the production of the updated service plan as one of the senior members of the team, has been off sick since May and we have been processing a prosecution and a potential food fraud case so the efforts of the team have been concentrated on undertaking interventions and case work.
7	Food Standards Agency	Develop and implement a suitable documented procedure for maintaining the food premises database to ensure that the food premises database is accurate, reliable and up to date.	Low	Database management procedure and audit arrangements to be developed and implemented.	Open	Ruth Austen	01/10/2017	30/11/17	Recommendations for procedures in making every inspection have been reviewed and a draft procedure has been developed. Meeting held on 17.7.17 with team members and business support analyst. Reviewed existing processes and began to draw up process diagrams and identify gaps. Further meeting arranged for mid August. 06/10/2017 A database management procedure is in the process of being developed and should be finalised in November.
8	Food Standards Agency	Review and implement the documented internal monitoring procedure to ensure that it includes risk based arrangements for the monitoring of all relevant activities carried out by the Service at appropriate frequencies, including staff authorisations, approved establishments and Primary Authority Partnerships.	Medium	A documented internal monitoring procedure is developed and implemented to include risk based arrangements for monitoring all activities carried out by the service.	Open	Ruth Austen	01/10/2017	31/12/17	06/10/2017 - An updated internal monitoring procedure is in the process of development and will be finalised by the end of December and in operation from January.
9	Licensing	The Council does not currently maintain a record of the flagging exercises which have been undertaken to demonstrate sufficient proactive work is being carried out in order to address unlicensed taxi operators. The only information available is the police witness statement taken and stored in a paper file where an unlicensed taxi operator is identified. Currently the council has not produced a flagging operation log, keeping the date of past operations that have been carried out. Additionally any recent flagging operation documents are kept on a paper based folder.	Low	A detailed flagging operation log should be produced much like the enforcementvisit spreadsheet, keeping a record of all the flagging exercises which have beencarried out.Additionally any future documentation relating to the flagging operations shouldbe kept electronically on the shared drive making it much more easily accessiblefor all employees.	Open	Ruth Austen	28/02/2017		email sent requesting current status of implementation of recommendations

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10	Housing options	When determining the most appropriate Temporary Accommodation for an applicant there is a hierarchy based on price and value for money where by applicants will be placed firstly in Council stock properties and in B&B's as a last resort, depending on availability. There is currently no evidence retained to demonstrate that this process has been adhered to and staff are ensuring the most cost effective accommodations is sought in the first instance. Households living in Temporary Accommodation , particularly those who have been accepted as being owed a rehousing duty, are required to bid for accommodation on Northampton's Housing Register in order	Low	TheCouncil's documentation will be updated to include a section where staffclarify that the cheapest BB is being used. TheCouncil will update documentation on the TA spreadsheet with details on whenapplicants last bid or when Officers last chased.	Open	Phil Harris	30/04/2017		email sent requesting current status of implementation of recommendations
11	Housing options	Where Temporary Accommodation is provided to applicants in the form of B&B / hotels, the Council is sometimes left with no option but to place households in accommodation that it does not normally use, using a credit card. These placements are not set up on the Council's systems, meaning that no housing benefit is claimed and the Housing Options & Advice Service is left to bear the full cost of providing the accommodation.	Low	TheCouncil is already seeking to establish invoicing arrangements with more BB's and to setthem up on the housing IT systems, ensuring that housing benefit can be claimedand the financial burden on the Housing Options Advice Service is reducedwhen this type of accommodation is procured.	Open	Phil Harris	30/06/2017		email sent requesting current status of implementation of recommendations
12	Housing options	There are no procedure notes available to formalise the operation of controls and processing of Temporary Accommodation. Although all members of the Housing Options & Advice Team are responsible for ensuring that they are up-to-date with legislative changes – and this is reflected in their job descriptions – it is the team leaders and the Housing Options & Advice Manager who are responsible for ensuring that all of the Housing Options & Advice Team's procedures, including those relating to Temporary Accommodation, are fit for purpose and in line with legislation, case law and government guidance. During the testing of control effectiveness, discrepancies were identified in the implementation of the controls, especially regarding the types of identification which are appropriate and the purpose of obtaining photographs of tenants entering Council properties. It would be good practice to have in place procedure notes which address the day to day operational aspects, clarify areas of uncertainty and are updated regularly to reflect legislative change regarding processing Temporary Accommodation.	Medium	Procedure notes should be created for allareas and going forward processes put in place to ensure these are reviewed andupdated regularly to reflect changes in legislation and clarify the proceduresto be undertaken.We understand officers have alreadycontacted other local authorities and obtained a copy of their policiesand procedures which will be adapted to reflect the Council's processes. Asuite of new policies and procedures are now being developed for theprocurement and allocation of Temporary Accommodation, including move-onarrangements.	Open	Phil Harris	30/06/2017		email sent requesting current status of implementation of recommendations