East Devon District Council

Report of Internal Audit Activity

Progress Report – Quarter 2 2024

Internal Audit – November 2024: 'At a Glance'

The Headlines

Reviews completed in the period
- Three reviews (one assurance, one advisory and one confidential) have been finalised.
- The last audit from the 2023/24 Plan has also been finalised.

Progress to date
- 48% of planned audits have been completed, are at draft report stage, or are in progress.
- Three audits are at draft report stage.
- Three audits are in progress.

High Organisational Risks identified in this period
- Housing Electrical Safety

Action plan monitoring
- We monitor the council's implementation of agreed management actions through our audit management system.
- The council has 95 active agreed management actions, compared to 87 in our last report.

Plan changes in the period
- We have added one confidential review to the Internal Audit Plan at management's request.

Range of innovations and enhancements made to our internal audit process throughout the year
- Following concerns the Audit and Governance Committee raised about the number of overdue actions, we have held action review meetings with all directorates.
- Through this process we obtained progress updates for almost all actions. Some actions have been closed and, where appropriate, some actions have been combined.

Internal Audit Assurance Opinions 2024/25

	Nov	YTD
Substantial	0	1
Reasonable	0	0
Limited	2	2
No Assurance	0	0
Advisory & Other	2	3
Total	**4**	**6**

Internal Audit Agreed Actions 2024/25

	Nov	YTD
Priority 1	3	3
Priority 2	9	10
Priority 3	9	10
Total	**21**	**23**

Summary

As part of our rolling plan reports, we will detail progress against the approved plan and any updates in scope and coverage.

We will also provide details of any significant risks that we have identified in our work, along with the progress of mitigating significant risks previously identified through audit activity.

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Introduction

The Audit and Governance Committee approved the 2024/25 H1 Internal Audit Plan in March 2024, and the H2 Internal Audit Plan in September 2024. This report sets out our progress against the combined Internal Audit Plan. **Appendix E** summarises our progress as of 31 October 2024 and identifies new audits that we have added to the Plan.

Each completed audit includes its respective assurance opinion rating, together with the number and relative ranking of actions we have agreed with management.

We have applied the assurance opinion ratings set out in the SWAP Audit Framework Definitions detailed in **Appendix A**.

To help the Committee in its important monitoring and scrutiny role, **Appendix B** summarises our key findings from No and Limited assurance opinion audits. There are two new Limited assurance audits highlighted in this report.

We conduct follow-ups for all No and Limited assurance audits. Follow-up audits assess whether the council has completed agreed actions. Outcomes from completed follow-up audits are summarised in **Appendix C**. We have not completed any follow-up audits since our last update to the Committee.

It is important that the council implements agreed actions to address the problems set out in our reports. To give the Audit and Governance Committee a level of assurance that this is happening, we conduct regular action tracking. The council's current position is set out in **Appendix D**.

Where there are findings that we believe pose a high organisational risk to the council, we have summarised these findings separately. We have identified one high organisational risk in this reporting period, please see **Appendix B**.

Internal Audit Progress Update

Our audit plan coverage assessment is designed to provide an indication of whether we have provided sufficient, independent assurance to monitor the organisation's risk profile effectively.

The internal audit plan agreed is based on our risk-based approach to help ensure that resources are focused where internal audit can offer the most value and insight. A key source of information is the Council's strategic risk register.

Internal Audit Plan coverage of strategic risks

This table maps our completed and planned audits against the council's strategic risks. As the year builds and more work is completed, coverage across key risk areas will increase. "Planned Coverage" includes audits that have not yet concluded or have not been started. Where a strategic risk is not linked to a specific audit, it may still be covered through the action tracking process (see **Appendix D**).

Strategic Risk	Completed Coverage	Planned Coverage
Business failure of a major contractor or significant partner		Supplier Resilience
Adequacy of financial resource planning to deliver the Council's priorities	**Planning Application Fees, LED Loss of Income Claim**	Treasury Management, Procurement Cards, Budget Monitoring, Housing Voids
Major disruption in continuity of computer and telecommunications services	Covered by Strata	
Adequate emergency planning and business continuity		Business Continuity
Failure to ensure the corporate property portfolio is fully compliant with legal requirements		Corporate Property H&S
Failure to follow data protection legislation requirements & good information governance		LG Transparency Code
Failure to deliver the Enterprise Zone and wider west end development programme		
Increasing homelessness		Temporary Accommodation
Failure to ensure the Council's sustainability		
Failure to adequately protect staff health and safety at work		Corporate Property H&S
Retaining and strengthen a collective approach to decision making	**Ethical Governance**	
Climate Change targets not achieved		
Recruitment and retention issues	**Establishment System**	Payroll
Reputational damage to the organisation		Project Management of Major Engineering Schemes
Risk of service failure		DFG Process
Impact of the economic situation on our residents		

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Given a risk-based approach is followed, it is important to demonstrate that agreed actions are implemented to reduce risks reported.

Monitoring of Agreed Actions

It is important that the council addresses the problems set out in our reports.

To give the Audit and Governance Committee a level of assurance that this is happening, we conduct regular action tracking.

The council's current position is summarised in **Appendix D**.

Most of the agreed actions are for audits that took place in 2022/23 or 2023/24. There are a small number of actions from earlier periods. We will continue to monitor these actions until they are completed.

We recognise that it can take longer to implement actions than planned, and sometimes target timescales need changing. The summary in **Appendix D** includes both original and current timescales.

We conduct follow-ups for all No and Limited assurance audits. These reviews assess whether the council has completed agreed actions.

Where we have performed a follow-up and concluded that actions are outstanding, we continue to monitor those actions. Once the action owner informs us that they have completed an action, we obtain supporting evidence to show this and then close the action on our monitoring record.

Internal Audit Progress Update

We need adequate audit coverage to provide our annual opinion.

2024/25 PLAN PROGRESS

■ Complete ■ Reporting ■ In progress ■ Not started

- 22% (Complete)
- 13% (Reporting)
- 13% (In progress)
- 52% (Not started)
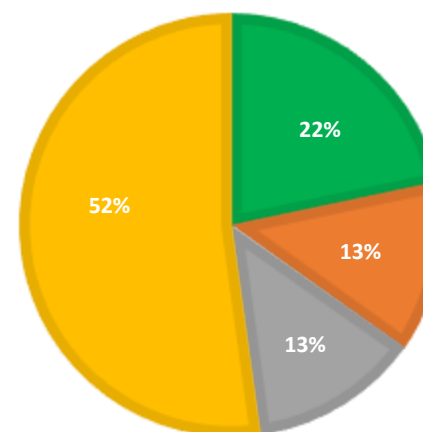
The chart above summarises our progress against the combined H1 and H2 Internal Audit Plans that the Audit and Governance Committee approved in March and September 2024, respectively. This chart also includes a further unplanned audit (Confidential Request #4) we have added to the Plan by request since our last Committee update.

As of 31 October 2024, 48% of planned audits have either been completed, are at draft stage, or are in progress.

As reported previously, following discussions with management and consideration of the H2 Plan, we have deferred two planned audits to 2025/26. We have included explanations for these deferrals in **Appendix E**.

Appendix A: SWAP Audit Framework and Definitions

Audit Assurance Definitions

No	The review identified fundamental gaps, weaknesses, or non-compliance, which require immediate action. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.
Limited	The review identified significant gaps, weaknesses, or instances of non-compliance. The system of governance, risk management and control requires improvement to effectively manage risks to the achievement of objectives in the area audited.
Reasonable	The review highlighted a generally sound system of governance, risk management and control in place. We identified some issues, non-compliance or scope for improvement which may put at risk the achievement of objectives in the area audited.
Substantial	The review confirmed a sound system of governance, risk management and control, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.

Organisational Risk Assessment Definitions

Assessment	Organisational Risk & Reporting Implications
High	Our audit work includes areas that we consider have a high organisational risk and potential significant impact. Both senior management and the Audit Committee should consider key audit conclusions and resulting outcomes.
Medium	Our audit work includes areas that we consider have a medium organisational risk and potential impact. The key audit conclusions and resulting outcomes warrant further discussion and attention at senior management level.
Low	Our audit work includes areas that we consider have a low organisational risk and potential impact. We believe the key audit conclusions and any resulting outcomes still merit attention but could be addressed by service management in their area of responsibility.

Categorisation of Actions

In addition to the organisational risk assessment it is important to know how important the individual management actions are. Each action has been given a priority rating with the following definitions:

Priority 1	Findings that are fundamental to the integrity of the service's business processes and require the immediate attention of management.
Priority 2	Important findings that need to be resolved by management.
Priority 3	Finding that requires attention.

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Ethical Governance – Final – October 2024

East Devon District Council

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Audit Objective To ensure the Council has a robust framework in place which promotes a strong ethical culture, high ethical standards and upholds the values of good governance and behaviours within the organisation.

Executive Summary

Assurance Opinion	Management Actions		Organisational Risk Assessment	Medium
The review identified significant gaps, weaknesses, or instances of non-compliance. The system of governance, risk management, and control requires improvement to effectively manage risks to the achievement of objectives in the area audited.	Priority 1	0	Our audit work includes areas that we consider have a medium organisational risk and potential significant impact. The key audit conclusions and resulting outcomes should be considered by both senior management and the Audit Committee.	
	Priority 2	6		
	Priority 3	3		
	Total	9		

Key Conclusions

The 'Members Code of Conduct' is a mandated training course, yet there is no process currently in place to remind non-attendees to undertake the training course. Staff are not mandated to read the 'Employees Code of Conduct' policy. Regular reminders are not issued to Members or staff to refresh their knowledge of these Codes of Conduct.

Regular reminders are not issued to Members to keep their declarations of interest up to date.
Whilst annual declaration reminders are issued to staff, there is no process in place to ensure that all staff return them, even if it is a 'nil' return.

Members declare the receipt of gifts and hospitality through the Mod Gov system, yet there is no process in place to remind them to do this.
For staff, there is no official process in place to enable them to declare the receipt of gifts or hospitality, nor are they issued with reminders to do so. A Gifts and Hospitality Protocol has been drafted, but not yet published.

Policies and codes of conduct promoting high ethical standards are published and easily available for Members and staff to access.
It is acknowledged that the Member Code of Conduct complaints procedure has received a major overhaul.

Audit Scope

The following control areas have been included in the scope;

- Member/staff awareness of the corporate policies
  - Anti-fraud, theft, and corruption
  - Bribery
  - Code of Conducts
- Declaration of interests of Members and staff
- Register of Gifts and Hospitality for Members and staff

A Member and staff survey has been undertaken to gauge levels of awareness and understanding of the Council's ethical objectives and requirements.

Other relevant information

To ascertain both Member and staff understanding of the ethical values and processes of the council, a survey was issued. Whilst results from that survey were consistent with the findings as shown in the appendix below, respondents were also given the opportunity to comment on or make suggestions as to how the Council could improve its overall arrangements in respect of ethical behaviour and conduct. Their responses are summarised below;

- Group ethical policies together
- Reintroduce the meta compliance system so that regular reminders are issued
- More and/or refresher training provided, make it mandatory
- Simplify the guidance, provide information in plain English, be clear about what is meant by ethical behaviour

Housing Electrical Safety – Final Report – October 2024

East Devon District Council

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Audit Objective | To assess the progress towards addressing the backlog of electrical safety inspections and repairs by the Housing Service.

Executive Summary

	Assurance Opinion	Management Actions		Organisational Risk Assessment	High

Assurance Opinion: Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.

Management Actions	
Priority 1	3
Priority 2	2
Priority 3	4
Total	9

Organisational Risk Assessment: Our audit work includes areas that we consider have a high organisational risk and potential significant impact.

Both senior management and the Audit Committee should consider key audit conclusions and resulting outcomes.

Key Conclusions

There is no one complete electrical safety compliance record. At the moment, Onehousing can record inspection outcomes but not recommended actions. Compliance officers use a spreadsheet to record the number of actions, but not what they are. Compliance officers told us that Onehousing does not have full compliance functionality. Housing is now looking at buying additional software to address this.

The Compliance team were not performing any quality assurance checks on the information recorded in Onehousing or the compliance spreadsheet. Spot checks have now been introduced.

The Electrical Safety Policy for Housing states the council's contractors must complete remedial works within 28 days of receiving an order.

At the time of our fieldwork officers told us they had no method of monitoring compliance with this requirement, and it was not a key performance indicator. However, officers have told us they have now implemented monitoring.

We found discrepancies between performance figures prepared by a Compliance officer and figures then used in service monitoring and KPI reports. These discrepancies appear to relate to differences in opinion about how the service should apply consultant downgrades and the possible risks of this approach. We could not confirm any reported figures because the service does not keep evidence to support KPI reports. Housing is now reviewing this in more detail and is working on introducing a new KPI dashboard.

Audit Scope

We reviewed the risk that an incomplete programme of electrical safety inspections and repairs work could lead to health and safety risks for tenants and financial and reputational damage to the council.

To do this we assessed the following control areas:
- The updated Electrical Safety Policy for Housing is compliant with electrical safety legislation and best practice guidance.
- The extent to which sufficient progress is being made to address the backlog of inspections and repairs.
- The performance data reported is accurate and complete and supported by evidence available within the Onehousing system.

We conducted audit interviews and testing between February and June 2024. This report reflects conditions that we saw at that time.

Further Information

In June 2023, after discovering it had become non-compliant with its 5-year electrical safety inspection programme, the council referred itself to the Regulator for Social Housing (RSH). The council then produced an action plan to address the problems it had found and shared this with the RSH. The RSH ceased monitoring the council's progress in December 2023.

This report reflects the conditions we saw during fieldwork, which took place in early 2024. Prior to and during this review, there has been significant officer turnover in Housing. The officers we interviewed during our fieldwork have now either left the council or changed role, and a new management team has been appointed.

Housing has agreed to complete nine actions by 1 April 2025. Officers told us they have completed one action, and work has already started on four other actions.

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SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors, further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note.

Appendix C: Follow-up Audits

There are no follow-up audits to highlight in this report.

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SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors, further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note.

Appendix D: Monitoring of Agreed Actions

Following concerns the Audit and Governance Committee raised about the number of overdue actions, we have held action review meetings with all directorates. Through this process we obtained progress updates for most agreed management actions. Generally, managers have extended the target timescales, which has reduced the number of reported overdue actions. We have also closed some actions following review of available evidence. Where management intends to address multiple reported findings through the same action, we have combined them where possible to reduce duplication.

The dashboard below summarises the council's position as of 31 October 2024. There are 95 open and self-assessed complete management actions, compared to 87 in our last Committee report. We have included detail for all open and self-assessed complete Priority 1 and 2 actions starting on the next page.

Open Management Actions — SWAP Internal Audit Services / East Devon District Council

Not yet due	Due within 30 days	1-30 days overdue	31-60 days overdue	61-90 days overdue	91+ days overdue	Total Actions
66	4	(Blank)	(Blank)	(Blank)	9	79

Actions by Status
79 Open | 16 Self Assessed as Complete | 50 Closed

Open Actions by Priority
- 1: 17
- 2: 46
- 3: 16

Overdue Open Actions
- 12 (15.19%) Overdue
- 67 (84.81%) On Time

Open Actions with Extended Dates
- 37 (46.84%) No
- 42 (53.16%) Yes

Appendix D: Monitoring of Agreed Actions

Priority 1 Management Actions

AP#	Year	Audit Title	Issue	Original Timescale	Current Timescale	Progress Status	Progress update
803	22/23	Small Works and Services Contract Management	The council's Contract Register is incomplete.	31/03/2022	30/11/2024	In Progress	October 2024: DCC Procurement contacted all ProContract users in January 2024 to remind them of the need to register all contracts with a value above £10,000 on ProContract, so they would be visible on the public-facing contract register. DCC Procurement also included this process in officer training. However, the contract register currently only has ten visible contracts, which indicates at least some contracts have not been recorded on ProContract. This will be followed up with officers and DCC Procurement.
2062	23/24	Agency staff and Consultants - Implications of IR35	The policy for hiring temporary support does not explicitly state who is responsible for determining their employment status.	31/08/2023	31/01/2025	In Progress	October 2024: The new Use of Temporary Workers Policy has been drafted, but HR is awaiting information from Finance on Contract Standing Orders requirements. We are aiming to finalise the Policy before end of 2024 and to present it to Personnel Committee for final approval in January 2025.
2174	23/24	Agency staff and Consultants - Implications of IR35	The council does not have a definitive list of all its off-payroll workers.	31/07/2023	30/11/2024	In Progress	October 2024: HR can now run reports of agency employees on iTrent. HR still need to validate this list and have booked a meeting with Finance in November to discuss how this will be managed on an ongoing basis.
2413	23/24	Agency staff and Consultants - Implications of IR35	Employment Status Assessment records are not complete.	31/10/2023	31/10/2024	In Progress	October 2024: The new Use of Temporary Workers Policy has been drafted, but HR is awaiting information from Finance on Contract Standing Orders requirements. HR is aiming to finalise the Policy before end of 2024 and to present it to Personnel Committee for final approval in January 2025. A News and Views communication will take place once the Policy is finalised.
2424	23/24	Agency staff and Consultants - Implications of IR35	A CEST assessment could not be located for a consultant.	30/09/2023	31/10/2024	In Progress	October 2024: HR has chased relevant managers for the agency staff identified in the audit and advised that a CEST assessment needs to be undertaken. If no response by 30/10/24 HR will escalate to relevant Director.

4337	23/24	Housing Electrical Safety	The council records electrical safety compliance information and evidence in three places, meaning there is no one complete electrical safety compliance record.	01/04/2025	01/04/2025	In Progress	*New Issue*
4473	23/24	Housing Electrical Safety	There are discrepancies between the compliance figures prepared by a Compliance officer and the reported performance figures.	01/04/2025	01/04/2025	In Progress	*New Issue*
4329	23/24	Housing Electrical Safety	The council does not monitor how quickly its contractors complete electrical remedial works.	31/03/2025	31/03/2025	In Progress	October 2024: Housing has advised the council is now monitoring the time between raising remedial works orders and completion of works but has not yet adopted the recommended KPI.
2398	23/24	Information Governance Policies and Compliance with Retention Policy	The council's Data Protection and Data Retention Policy, Information Security Policy and Information Security Incident Policy are overdue a review.	31/01/2024	31/10/2024	In Progress	October 2024: The Data Protection and Data Retention Policy and Information Security Incident Management Policy have now been updated. The Information Governance team will check whether Strata has updated the Information Security Policy.
2785	23/24	Information Governance Policies and Compliance with Retention Policy	The Record of Processing Activities (ROPA) is dated 2018; this has not been updated since and there are some gaps within the document.	31/03/2024	31/03/2025	In Progress	October 2024: The Information Governance team has been working on the Information Asset Register (IAR). Once the IAR is complete, the Information Governance team will conduct the data mapping exercise as recommended.
2519	23/24	Information Governance Policies and Compliance with Retention Policy	The council's Information Asset Register is incomplete and has not been reviewed since its creation in January 2018.	31/10/2024	31/12/2024	In Progress	October 2024: The Information Governance team is working on the Information Asset Register (IAR).
2517	23/24	Information Governance Policies and Compliance with Retention Policy	The council does not have a standalone Data Retention Policy.	31/07/2024	21/08/2024	Evidence Check	October 2024: The Data Retention Policy is now complete and has been published on the intranet.
2399	23/24	Information Governance Policies and	The council does not have seven of the 10 expected policies by the ICO.	31/03/2024	31/03/2025	In Progress	October 2024: Some, but not all, of the missing policies are now in place. Some of the missing policies fall under Strata or other officers, so the

		Compliance with Retention Policy					Information Governance team will confirm what progress has been made on those policies.
2726	23/24	Performance Management	There is no Performance Management Framework which details how performance is to be managed and monitored across the council.	31/03/2024	01/04/2025	In Progress	October 2024: The council is now procuring a new performance and risk management system, InPhase, which it hopes to implement by January 2025. This implementation will affect what needs to be included in the Performance Management Framework.
3762	23/24	Planning Enforcement	For almost all cases we reviewed, there was no evidence determinations had been suitably authorised.	30/06/2024	30/06/2024	Overdue	October 2024: Responsible officer to confirm whether the Scheme of Delegation has been updated.
3494	23/24	Planning Enforcement	There is no guidance setting out how officers should record planning enforcement cases.	30/06/2024	30/06/2024	Overdue	October 2024: The issues identified in the audit have been discussed with officers, but written guidance is not yet in place.
3308	23/24	Strategic Partnerships	The Partnership Policy does not set out any due diligence requirements or how to consider the risks and financial exposures of a partnership. There was no evidence that council's involvement in three partnerships we reviewed had been approved.	31/05/2024	31/12/2024	In Progress	October 2024: A new Partnership Policy which addresses concerns raised in the audit is due to be submitted to the November Audit and Governance committee for sign off.
5344	23/24	Volunteer Management	The Volunteering Policy does not include guidance on volunteer health and safety requirements, supervision, performance management or disclosure and barring clearance.	31/01/2025	31/01/2025	In Progress	October 2024: HR has drafted a new Volunteering Policy which includes health and safety, management, performance management and DBS arrangements. This will be presented to Personnel Committee for approval in January 2025.

Appendix D: Monitoring of Agreed Actions

Priority 2 Management Actions

AP#	Year	Audit Title	Issue	Original Timescale	Current Timescale	Progress Status	Progress update
809	22/23	Debtors (Accounts Receivable)	Sundry Debtor procedures are incomplete.	31/12/2023	31/03/2025	In Progress	October 2024: Finance is in the process of implementing a new financial management system which will necessitate further updates to sundry debtor processes. Finance will update and finalise the sundry debtor procedures once the new system is in place.
5338	22/23	Out of Hours Schemes	The council's Out of Hours schemes do not reflect current practice. Out of Hours scheme rates have not been reviewed for several years. We identified several other improvements that could be made to current practice.	30/04/2025	30/04/2025	In Progress	October 2024: Progress on the consultation and implementation on the policy and new rates has been delayed because of extended absence of HR Lead. Indicative costs will be presented to ELT in late October. If agreed, the policy will then be consulted on. Depending on the outcomes of the consultation process, the updated policy will be presented to Personnel Committee for approval in either January or April 2025.
785	20/21	Procurement	Project Notification Forms (PNFs) are not always completed as required.	31/03/2021	29/02/2024	Overdue	October 2024: DCC has provided a procurement training for staff this year which included Procurement Notification Forms. However, the Procurement Notification Form has not been updated to include a field specifying whether a framework agreement has been used, therefore this action is still in progress.
795	21/22	Risk Management	Risks are not aligned to council priorities.	30/06/2022	31/03/2024	Evidence Check	October 2024: The council has completed an exercise to align the corporate risk register to the new Council Plan priorities.
793	21/22	Risk Management	Not all Service Planning Risks appear on the risk register.	30/06/2022	31/03/2024	Evidence Check	October 2024: Officers were instructed to add service plan risks to the corporate risk register. However, there has been a corporate restructure and a new Council Plan since the current year service plans were agreed, so they may now be outdated. The council intends to introduce directorate plans for 2025/26 and is introducing a new performance and risk management system (InPhase). Ahead of directorate planning there has been a comparison of the new Council Plan to the corporate risk register.

792	21/22	Risk Management	The process for ensuring that any risks identified as part of decision making are added to the risk registers is not embedded.	30/06/2022	29/03/2024	Overdue	October 2024: An updated Risk Management Policy and Guidance document was approved by Audit and Governance Committee in January 2024. However, the Policy and Guidance document does not include a clear process or responsibilities for ensuring that risks highlighted in decision reports are entered onto the corporate risk register.
804	22/23	Small Works and Services Contract Management	The Contract Standing Orders do not explain how smaller contracts should be monitored.	31/03/2022	31/03/2024	Overdue	October 2024: The Contract Standing Orders (CSOs) now direct contract managers to view additional guidance available on the Procurement Portal. However, this guidance does not differentiate between small and large contracts. The CSOs include some minimum contract management expectations but does not specify this applies to all contracts.
805	22/23	Small Works and Services Contract Management	No Contract Management guidance available for contract managers	31/03/2022	31/12/2024	In Progress	October 2024: There is no bespoke training for EDDC contract managers. Finance is looking at developing training materials with help from the DCC Procurement team. However, general guidance is available on the Procurement Portal.
2416	23/24	Agency staff and Consultants - Implications of IR35	Notification of Outcome of Employment Status Assessment to the Off-Payroll Worker	30/09/2023	31/01/2025	In Progress	October 2024: HR expects the new Use of Temporary Workers Policy will be approved by the end of January 2025. HR has been receiving emails showing communication of Employment Status Assessment outcomes to off-payroll workers, but not formalised letters. HR will create a formal letter template and communicate the template to managers at the same time as the updated Policy.
2186	23/24	Agency staff and Consultants - Implications of IR35	There is no separate corporate induction checklist for senior managers.	31/10/2023	31/03/2025	In Progress	October 2024: HR will roll out training for managers once the new Use of Temporary Workers Policy has been approved.
2575	22/23	Climate Change	Performance Monitoring and Reporting needs further definition and improvement.	29/09/2023	01/04/2024	Evidence Check	October 2024: The 2024/25 Action plan has been published and will be refreshed again for 2025/26 once the updated strategy is agreed. There are regular updates on climate change to Scrutiny Committee and it is a standing agenda item on SLT. SWEEG will be assisting us with

							performance reporting methodology once the new strategy is published. The council is introducing a new performance management system in early 2025, and it hoped this will facilitate performance reporting across multiple data sources.
2574	22/23	Climate Change	There is no dedicated body/committee with oversight of the Climate Change Strategy.	31/05/2023	01/04/2025	In Progress	October 2024: The next reports on Climate Change for Scrutiny Committee are due in November 2024.The new Council Plan requires quarterly reporting going forward. There are ongoing discussions about the possibility of introducing a board that will focus on climate change. This action will remain open until the council has reached a determination on this.
2573	22/23	Climate Change	The Climate Change Action Plan has not been fully costed.	29/09/2023	01/04/2025	In Progress	October 2024: The council's focus is on providing an action plan that is realistically achievable with the resources and budget available. The action plan will be published alongside the updated Strategy in April 2025.
2572	22/23	Climate Change	The Climate Change Strategy Action Plan is not SMART (specific, measurable, achievable, realistic and timely).	29/09/2023	01/04/2025	In Progress	October 2024: The council expects to publish the updated Strategy by 1 April 2025, pending approval from SLT and public consultation.
3103	22/23	Cranbrook Town Development	Although outline projects have been determined, Cranbrook Town Centre remains at a programme phase. Programme governance requirements are necessary as the project progresses.	31/10/2024	31/03/2025	In Progress	October 2024: Specific recommendations from the advisory review have been considered by Executive Leadership Team. Some actions, including a new term of reference for the Cranbrook Placemaking Group, have been completed. The Placemaking Group considers an implementation plan and risks at each meeting. Specific projects are subject to their own management arrangements but are considered as part of the wider programme. Further work on RAID management still needs to be completed. The Cranbrook Town Centre Master

2443	23/24	Damp and Mould in Council Homes	Stock condition surveys are currently being undertaken across all council properties. There have been cases where tenants have subsequently contacted the council stating that they have an issue with damp and mould.	30/09/2023	31/10/2024	Evidence Check	Plan will be considered by the Strategic Planning Committee on 29 October 2024. October 2024: Housing is waiting on full Stock Condition Survey (SCS) data from the contractors and expects to receive this next month. This covers more than just damp, mould and condensation issues. However, this data will only include very significant damp, mound and condensation cases. We can now access the contractor's data through an online portal. We are also recording damp, mould and condensation issues we identify through visits, as well as any complaints caused by resulting from damp, mould and condensation.
2581	23/24	Damp and Mould in Council Homes	Damp and mould complaints are not tracked and monitored through the housing system.	30/09/2023	31/03/2025	In Progress	October 2024: Housing continues to use a spreadsheet to record complaints. Once the council implements the new InPhase system, Housing expects that all complaints data will be imported into that system. This will mean all complaints are held in one place, which will facilitate corporate oversight. Going forward the Corporate Lead Housing Performance will be monitoring all housing-related complaints.
3864	23/24	Elections	Required actions following an error and complaint in a previous election have not been completed in full.	31/07/2024	01/05/2025	In Progress	October 2024: Electoral Services has now introduced a complaints log, but it is not yet populated. Ahead of the 2024 General and PCC Elections, Electoral Services prepared a PowerPoint presentation that includes procedures for that election. This will be updated at each election. Electoral Services are now preparing a formal procedure document.
3865	23/24	Elections	There are gaps in terms of the Data Sharing Agreements that the team is required to have in place.	30/09/2024	31/12/2024	In Progress	October 2024: Electoral Services has sought advice from the Information Governance team regarding data sharing with Registration Services. A Data Sharing Agreement with Registration Services is not yet in place.

2053	23/24	Emergency Planning	No Local Risk Register.	31/12/2023	01/01/2025	In Progress	October 2024: The National and Community Risk Registers have now been localised but need to be presented to and agreed by SLT. This should be completed by the end of 2024. The council may decide to update the update the new Register six-monthly rather than quarterly. This would be in line with the National Resilience Risk Register.
3177	23/24	Establishment Control	There are no establishment reconciliations outside of the annual budget setting process.	31/12/2024	31/12/2024	In Progress	October 2024: HR is meeting with Finance in November 2024 to discuss and agree what process is needed going forward.
5310	24/25	Establishment System Controls	Officers believe iTrent has audit trail functionality, but it is not easily accessible or usable.	31/12/2024	31/12/2024	In Progress	*New Issue*
4824	24/25	Ethical Governance	There is no official process or form for staff to declare receipt of gifts or hospitality, and staff are not reminded to make declarations.	31/01/2025	31/01/2025	In Progress	*New Issue*
4822	24/25	Ethical Governance	There is no process to ensure staff complete annual declarations of interest and return these to Democratic Services.	31/01/2025	31/01/2025	In Progress	*New Issue*
4818	24/25	Ethical Governance	There is no process to remind staff to refresh their understanding of the Code of Conduct.	31/03/2025	31/03/2025	In Progress	*New Issue*
4817	24/25	Ethical Governance	Some Members have not completed Code of Conduct training. There is no process to remind non-attendees of the requirement to complete training sessions.	31/01/2025	31/01/2025	In Progress	*New Issue*
4823	24/25	Ethical Governance	There is no process to remind Members that they must declare any gifts or hospitality they have received within 28 days of receipt.	31/12/2024	31/12/2024	In Progress	*New Issue*
4821	24/25	Ethical Governance	Members are not regularly reminded to ensure their declarations of interest published on the Mod Gov system are up to date.	31/03/2025	31/03/2025	In Progress	*New Issue*
788	21/22	Firmstep	No Benefit Realisation Plan is in place.	31/07/2022	01/10/2025	In Progress	October 2024:

789	21/22	Firmstep	No Post Implementation Review has been scheduled.	31/07/2022	01/10/2025	In Progress	Though the council implemented Firmstep in 2019, there are many planned activities that have not yet been delivered. Most of the council is now using Firmstep, but there are notable exceptions to this. Strata is trying to establish a direction of travel for Firmstep across the Strata partnership. The Strata Architecture Board has recently adopted a paper that will place more importance on this work. The council has not yet started work on a Benefits Realisation Plan due to the lack of a clear Digital Transformation strategy. The responsible officer has recently left the council, and a replacement is due to be appointed pending a service restructure. October 2024: The project has not had a dedicated project lead since 2020. Strata has recently tabled a paper which will require all Strata partners to restart this project with clear governance, goals and deliverables. The Corporate Lead has recently left the council, a replacement is due to be appointed pending a service restructure.
4338	23/24	Housing Electrical Safety	There is no quality assurance of electrical safety compliance information recorded in Onehousing or the compliance spreadsheet.	01/04/2025	01/04/2025	Evidence Check	October 2024: Spot checks have now been introduced. Evidence is required to close the action.
4474	23/24	Housing Electrical Safety	The Housing service does not retain evidence confirming reported KPI figures.	01/04/2025	01/04/2025	In Progress	*New Issue*
2795	23/24	Housing Whistleblowing Concerns Follow Up	The satisfaction survey process has not targeted all tenants.	30/06/2022	31/10/2024	Evidence Check	October 2024: Housing is now conducting phone satisfaction surveys for at least 10% of jobs completed each month, and reporting on the performance of satisfaction measures quarterly instead of annually. This means Housing can address issues much earlier. Longer term, Housing is hoping to introduce a tenant portal that will allow tenants to see details of works on their properties and the stage each job is at.
2692	23/24	Information Governance Policies and Compliance with Retention Policy	There is a lack of assurance that records both held and deleted on individual officer drives and mailboxes are stored in line with the council's document retention requirements.	30/04/2024	31/12/2024	In Progress	October 2024: The Data Retention Policy has now been updated. Assistant Directors are now reviewing the Data Retention Schedules included in the Policy, which sets out the different types of documentation and how they should be managed. Once this review is complete, the Policy will be communicated to officers.

2518	23/24	Information Governance Policies and Compliance with Retention Policy	The council has not reviewed its data retention schedule since January 2020.	31/03/2024	29/11/2024	In Progress	October 2024: The Document Retention Policy (DRP) has been updated and published. Assistant Directors are now reviewing their sections of the DRP schedules to ensure it is up to date. A new column to record the disposal decision (the action to be taken once the retention period has passed) has been added to the schedule. Discussions around the DRP schedule are ongoing at the Information Governance working group.
2584	23/24	Information Governance Policies and Compliance with Retention Policy	The council does not currently undertake any checks to ensure records are being held in accordance with the Data Retention Schedule.	31/12/2024	31/12/2024	In Progress	October 2024: This action is now on track.
2622	23/24	Information Governance Policies and Compliance with Retention Policy	No specific training is given on data retention to inform staff of their responsibilities.	31/03/2024	31/07/2025	In Progress	October 2024: This has not yet progressed. The Information Governance team will work with HR and Strata to prepare a data retention training module. HR is introducing a process that will give Executive Leadership Team oversight of all mandatory training, including compliance with refresher training.
2907	23/24	Performance Management	The Performance Indicator report is missing some indicators for key priorities at the council.	31/03/2024	31/03/2025	Evidence Check	October 2024: The council has introduced a new Council Plan (2024-2028), and each corporate priority now has performance indicators linked to it. A spreadsheet is being used to monitor performance against the new metrics until the new InPhase system is implemented in early 2025. The Council Plan Service Objectives and PIs spreadsheet includes a "Performance Indicators" tab with 152 performance indicators. Separate to this there are 105 success measures linked to Council Plan priorities. The first corporate performance indicator report with the revised indicators will be presented to Cabinet in November 2024.
2917	23/24	Performance Management	There has historically been little challenge to the quarterly performance indicator reports presented to SLT.	31/12/2023	31/03/2025	In Progress	October 2024: The council is developing a performance culture, which will be assisted by the new performance system (InPhase) and new

							framework. The SLT has an important role in introducing and enforcing this new culture.
2916	23/24	Performance Management	Indicators are not always complete, despite reminders.	31/03/2024	31/03/2025	In Progress	October 2024: The new performance management system, InPhase, will issue automatic emails reminders to officers when they need to provide updates. There will also now be an escalation route to the Director of Governance and Corporate Services who is now responsible for this area. The new Performance Management Framework will include the escalation procedure.
2838	23/24	Performance Management	Supporting information provided with Performance Indicator Reports could be improved to aid understanding.	31/03/2024	31/03/2025	In Progress	October 2024: Officers met with Chair of the Scrutiny Committee to review all performance indicators. This has resolved some of the issues raised. However, the current system does not have all the functionality needed to address all issues raised. The council is now procuring a new system that will have better reporting functionality and can provide forecast data.
2836	23/24	Performance Management	Action is adequately documented where performance has not met the required standard	31/03/2024	31/03/2025	In Progress	October 2024: The council is implementing a new system, InPhase. There is potential to set system requirements so updates cannot be made without supporting commentary. The new Performance Management Framework will include updated guidance, and officers will be trained on both InPhase and the new Framework.
2908	23/24	Performance Management	There is no validation of the data that is input into SPAR.net before it is included in the performance reports.	31/03/2024	31/03/2025	In Progress	October 2024: In InPhase, data will be entered either directly by officers or automatically through an Application Programming Interface (API). The API functions will be tested when the system is implemented. Requirements for data validation will be included in the Performance Management Framework. There is also a dependence on the council implementing a new Data Quality Policy which will set out expected standards.
4360	24/25	Planning Application Fees	There is no active reconciliation between payments made through the planning portal, or using the online payment tool,	31/08/2024	31/08/2024	Evidence Check	October 2024: Planning has now introduced a reconciliation process.

			and the income received into the relevant account code in eFinancials.				
3710	23/24	Recruitment and On-Boarding	There is no HR oversight to ensure all recruiting managers had completed recruitment and onboarding training, and no monitoring that all new employees complete induction training.	30/04/2024	30/04/2025	In Progress	October 2024: Face to face training records are now held in iTrent and HR can produce reports showing who has completed the training. There is no regular monitoring of this at the moment due to a review of management development programmes that is due to complete in 2025.
3319	23/24	Strategic Partnerships	There was limited evidence of internal performance reviews to determine value for money, and no evidence that the council monitors the performance of its partnerships.	31/05/2024	31/12/2024	In Progress	October 2024: These elements have been included in the new Partnership policy that is due to be submitted to the November Audit and Governance committee for sign off.
3311	23/24	Strategic Partnerships	Partnerships do not have a process for members to declare a personal interest and this requirement is not in the current Partnership Policy.	31/05/2024	31/12/2024	In Progress	October 2024: The draft Partnership Policy will be reviewed to ensure minimum standards for declaring interests have been included. The Policy requires approval by the Audit and Governance Committee before it can be adopted.
3312	23/24	Strategic Partnerships	The approach taken by the council to show how its partnerships contribute to its corporate priorities is not always meaningful.	31/05/2024	31/12/2024	In Progress	October 2024: Space has been added to the Partnership Register for responsible officers to declare how partnerships support the council's corporate priorities. Once the new Framework has been formally approved, officers will be asked to populate the Register.
3310	23/24	Strategic Partnerships	The Partnership Register does not record what type of agreement is in place. Information was lacking in the two informal agreements reviewed.	31/05/2024	31/12/2024	In Progress	October 2024: The council has produced a new Partnership Framework and Register. This has been approved ELT and SLT but requires sign off from the Audit Committee before it can formally adopted. The next Partnership Review by Audit and Governance Committee is due in March 2025.
3317	23/24	Strategic Partnerships	Not all partnerships identified in service plans appear on the partnership register.	31/05/2024	31/03/2026	In Progress	October 2024: Due to the new InPhase system being implemented and the level of ongoing change, the council has decided it will produce directorate plans in 2025/26 rather than traditional service plans. The directorate plan template has been simplified so it only requires specific information. This does not include details of relevant partnerships. However, this may be re-introduced for 2026/27.

Appendix D: Monitoring of Agreed Actions

3565	23/24	Volunteer Management	There is no formal health and safety training as part of the volunteer's induction.	30/04/2024	31/01/2025	In Progress	October 2024: HR has drafted a new Volunteering Policy which includes health and safety, management, performance management and DBS arrangements. This will be presented to Personnel Committee for approval in January 2025.
3572	23/24	Volunteer Management	The performance management and supervision arrangements in the Volunteering Policy are not clear. There are, therefore, variations of arrangements in place for Gallery and Countryside volunteers.	30/04/2024	31/01/2025	In Progress	October 2024: HR has drafted a new Volunteering Policy which includes health and safety, management, performance management and DBS arrangements. This will be presented to Personnel Committee for approval in January 2025.
3564	23/24	Volunteer Management	There is no evidence that volunteers in the Gallery have received and understood their induction. No induction checklist is used for Countryside volunteers.	30/04/2024	30/04/2024	Overdue	
3574	23/24	Volunteer Management	The Countryside team have not created a risk assessment that covers the risks for volunteers working in the Discovery Hut.	30/04/2024	30/04/2024	Overdue	
3516	23/24	Volunteer Management	Neither the Gallery nor the Countryside teams obtain DBS clearance for their volunteers.	30/04/2024	30/04/2024	Overdue	
806	21/22	Workforce Planning	The People Strategy in place is not an active document.	30/06/2023	31/03/2025	In Progress	October 2024: The People Strategy forms part of the Council Plan action plan, with an agreed completion date of March 2025.

Appendix E: Summary of Internal Audit Work

Audit Type	Audit	Status	Assurance Opinion	Total Actions	1 = Major	⟷	3 = Medium
					Recommendation		
					1	2	3
Complete							
Assurance	Planning Application Fees	Final	Substantial	2	0	1	1
Advisory	LED Exmouth Pavilion Loss of Income Claim	Final	N/A	1	0	0	1
Assurance	Housing Electrical Safety *(from 2023/24 Plan)*	Final	Limited	9	3	2	4
Assurance	Ethical Governance	Final	Limited	9	0	6	3
Advisory	Establishment System Controls	Final	N/A	3	0	1	2
N/A	**NEW:** Confidential Request #4	Final	N/A	0	0	0	0
Reporting							
N/A	Confidential Request #1	Draft					
N/A	Confidential Request #2	Draft					
Assurance	Corporate Property Health and Safety	Draft					
In progress							
Assurance	Treasury Management	In progress					
Proactive Fraud	Procurement Cards	In progress					
Assurance	Disabled Facilities Grants Process	In progress					
Not started							
Assurance	Supplier Resilience	Not started					

Appendix E: Summary of Internal Audit Work

Audit Type	Audit	Status	Assurance Opinion	Total Actions	1 = Major		3 = Medium
					Recommendation		
					1	2	3
Assurance	Temporary Accommodation	Not started					
Assurance	Business Continuity	Not started					
Assurance	Project Management of Major Engineering Schemes	Not started					
N/A	Confidential Request #3	Not started					
Assurance	Budget Monitoring	Not started					
Assurance	Creditors	Not started					
Assurance	Housing Voids	Not started					
Assurance	Local Government Transparency Code	Not started					
Assurance	Payroll	Not started					
Assurance	Section 106 and CIL	Not started					
Follow Up	Strategic Partnerships	Not started					
Deferred							
Assurance	Community Safety/Anti-Social Behaviour	Deferred	Deferred to 2025/26 (Q1) due to service restructure.				
Assurance	Firmstep – GDPR Compliance	Deferred	Deferred to 2025/26 (Q1) due to anticipated DWP review.				

SWAP
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