







# East Devon District Council

Report of Internal Audit Activity

Progress Report – Quarter 3 2024/25

## Internal Audit – March 2025: ‘At a Glance’

### The Headlines

	<b>Reviews completed in the period</b> <ul style="list-style-type: none"> <li>6 reviews (4 assurance and 2 confidential) have been finalised.</li> </ul>
	<b>Progress to date</b> <ul style="list-style-type: none"> <li>95% of planned audits have been completed, are at draft report stage, or are in progress.</li> <li>10 audits are in progress.</li> </ul>
	<b>High Organisational Risks identified in this period</b> <ul style="list-style-type: none"> <li>We did not identify any High Organisational Risks in this period.</li> </ul>
	<b>Action plan monitoring</b> <ul style="list-style-type: none"> <li>We monitor the council’s implementation of agreed management actions through our audit management system.</li> <li>The council has 136 active agreed management actions, compared to 95 in our last report.</li> </ul>
	<b>Plan changes in the period</b> <ul style="list-style-type: none"> <li>We have added 3 further reviews to the Internal Audit Plan at management’s request.</li> </ul>
	<b>Range of innovations and enhancements made to our internal audit process throughout the year</b> <ul style="list-style-type: none"> <li>We have given officers access to our audit management system, so they can view and update their agreed audit actions independently.</li> </ul>

### Internal Audit Assurance Opinions 2024/25

	Mar	YTD
Substantial	0	1
Reasonable	3	3
Limited	1	3
No Assurance	0	0
Advisory & Other	2	5
<b>Total</b>	<b>6</b>	<b>12</b>

### Internal Audit Agreed Actions 2024/25

	Mar	YTD
Priority 1	2	5
Priority 2	23	33
Priority 3	21	32
<b>Total</b>	<b>46</b>	<b>70</b>

## 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.

The contacts at SWAP in connection with this report are:

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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 2024/25 Internal Audit Plan. **Appendix E** summarises our progress as of 24 February 2025 and identifies new audits that we have added to the Plan since our last update to Committee.

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 is one new Limited assurance audit 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 summarise these findings separately. We did not identify any high organisational risks in this reporting period.

## 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 Framework
Risk of service failure	DFG Process	
Impact of the economic situation on our residents		

## Internal Audit Progress Update

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

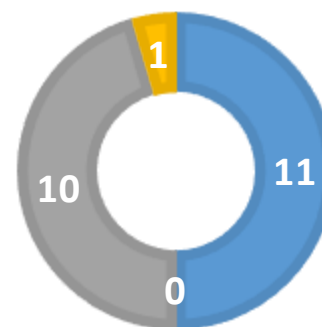
We need adequate audit coverage to provide our annual opinion.



### Year to Date Progress

#### 2024/25 INTERNAL AUDIT PLAN PROGRESS

■ Complete ■ Reporting ■ In progress ■ Not started



The chart above summarises our progress against the combined 2024/25 Internal Audit Plan. The combined Plan originally included 19 audits.

Since the year started, 9 additional reviews have been added to the Plan following officer requests. Because of this we have deferred or removed 6 planned audits (see **Appendix E**). This leaves an agreed Plan comprised of 22 audits.

As of 24 February 2025, 11 planned audits (50%) have been completed, 0 (0%) are at draft report stage and 10 (45%) are in progress.

The figures above do not include Housing Electrical Safety, which has also been completed but was part of the 2023/24 Internal Audit Plan.

## Appendix A: SWAP Audit Framework and Definitions

### Audit Assurance Definitions

<b>No</b>	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.
<b>Limited</b>	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.
<b>Reasonable</b>	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.
<b>Substantial</b>	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
<b>High</b>	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.
<b>Medium</b>	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.
<b>Low</b>	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:

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




## Appendix B: No and Limited Assurance Audits

### EDDC Procurement Cards Proactive Fraud Review 2024-25 – Final Report



**Audit Objective** Review procurement card transactions from 1st April 2022 to date to identify those that are non-compliant with Policy and to consider risks of fraudulent use.

#### Executive Summary

	Assurance Opinion	Management Actions		Fraud Risk Assessment	Medium	
	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 reviewed.	Priority 1	0	Our review includes areas that we consider have a medium fraud risk and potential for moderate impact.		
		Priority 2	3			
		Priority 3	7	The key conclusions and resulting outcomes should be considered by senior management at the Council.		
		Total	10			

#### Key Conclusions

Key Conclusions	Scope
We found 14 instances where the cardholder had not signed the month end summary sheet and 20 instances where no authorisation was provided by a manager. Without a fully completed summary sheet there is reduced assurance that transactions are legitimate and a greater risk of error or fraud.	<p>This review has assessed the residual fraud risk around procurement cards and has focused on procurement card transactions from the 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.</p> <p>We have reviewed:</p> <ul style="list-style-type: none"> <li>· Spend data using data analysis and identify any 'red flags' to select a proportionate sample of transactions for review.</li> <li>· Instances of non-compliance with policy or where spend is considered fraudulent.</li> <li>· Policies and procedures governing the issue and use of procurement cards and how users are made aware of this.</li> <li>· Monitoring, reporting and management oversight of procurement cards.</li> </ul> <p>A questionnaire was sent out all current cardholders to collect feedback and to highlight areas of focus and improvement. The results are shown in Appendix B of the main report. Some of the themes relate to actions in the report, but the Council should consider the feedback from cardholders and ensure that other areas of concern raised in the survey are addressed.</p>
47% of survey respondents admitted to occasionally or routinely sharing their procurement cards with colleagues. Cardholders had been provided with little or no training on how to use the card and there was a lack of understanding around how cardholders could be targeted by fraudsters. Furthermore, cardholders indicated uncertainty or a lack of knowledge regarding the process for reporting a lost or stolen card.	
Full cardholder documentation was not provided for two of the sampled five cardholders. Without key documents, the organisation and cardholder may be at risk for misuse, fraud, or misunderstandings about the card's intended use.	
The cardholder procedures do not specifically identify what transactions are permitted and not allowed and key document review dates are not recorded. This could create opportunities for inadvertent misuse or misinterpretation of Council funds.	
Spend analysis shows significant spend against Housing Support, Homelessness and Estates Management. Whilst we accept that services are sometimes reactive to demand, the Council should consider use of contracts to reduce costs and to demonstrate achievement of value for money.	

Procurement Cards carry an inherently high risk of fraud and/ or misuse as identified in the latest EDDC Fraud Risk Assessment. While procurement cards offer significant benefits in terms of efficiency and convenience, they also present various fraud risks that can have financial implications. Whilst we have found no evidence of fraudulent transactions, the medium assessment of residual risk is due to non-compliances within the exiting control framework, leaving the Council at increased risk of fraud, error and misuse in this area.

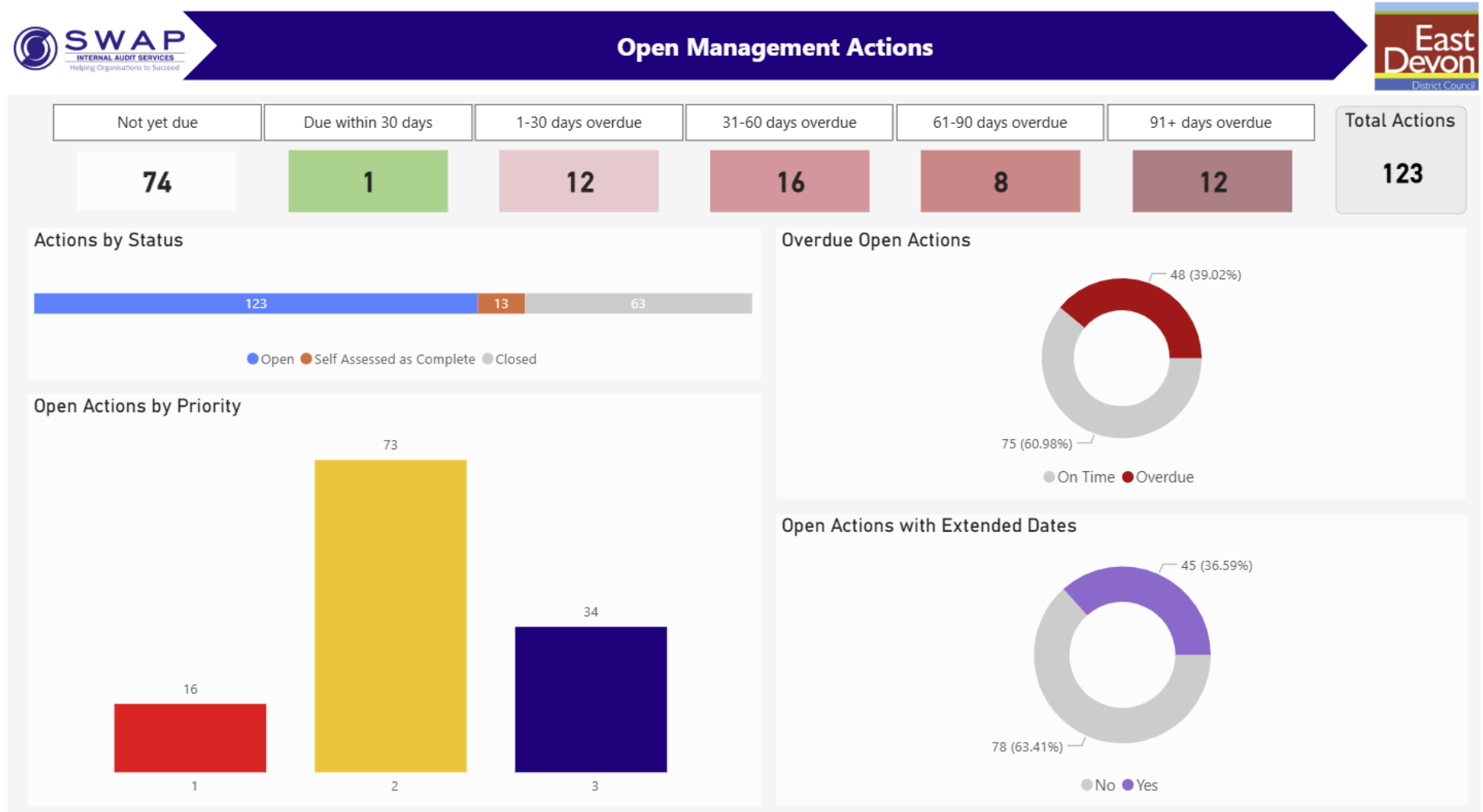


## Appendix C: Follow-up Audits

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

## Appendix D: Monitoring of Agreed Actions

The dashboard below summarises the council's position as of 24 February 2025. There are 136 open and self-assessed complete management actions, compared to 95 in our last Committee report. We have included the latest management update for all open and self-assessed complete Priority 1 and 2 actions starting on the next page.



## Appendix D: Monitoring of Agreed Actions

### Priority 1 Management Actions

AP#	Year	Audit Title	Issue	Original Timescale	Current Timescale	Progress Status	Progress update
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	Overdue	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.
2174	23/24	Agency staff and Consultants - Implications of IR35	The council does not have a definitive list of all its off-payroll workers.	30/11/2024	30/11/2024	Overdue	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.	31/10/2024	28/02/2025	Evidence Check	February 2025: The Use of Temporary Workers Policy has now been approved by the Personnel Committee and published on the intranet. The policy update has also been announced to staff through the weekly Stay Informed Newsletter.
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	Evidence Check	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.
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	
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	
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	Overdue	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.

## Appendix D: Monitoring of Agreed Actions

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	Overdue	October 2024: The Information Governance team is working on the Information Asset Register (IAR).
2399	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.	31/03/2024	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 Information Governance team will confirm what progress has been made on those policies.
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.
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 in early 2025. This implementation will affect what needs to be included in the Performance Management Framework.
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.
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.
803	21/22	Small Works and Services Contract Management	The council's Contract Register is incomplete.	31/03/2024	30/11/2024	Overdue	February 2025: We expect that all the outstanding actions from this audit will be superseded by the planned Contract Management audit that will take place in the first half of 2025/26.
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	Overdue	February 2025: The Personnel Committee has approved the updated Use of Volunteers Policy. The policy update has also been announced to staff through the weekly Stay Informed Newsletter. This update

## Appendix D: Monitoring of Agreed Actions

states a supervisor checklist, engagement letter and further guidance is due to be published soon.

## Appendix D: Monitoring of Agreed Actions

### Priority 2 Management Actions

AP#	Year	Audit Title	Issue	Original Timescale	Current Timescale	Progress Status	Progress update
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	Overdue	February 2025: The Personnel Committee has approved the updated Use of Temporary Workers Policy. The Policy confirms that recruiting managers must communicate the outcomes of the CEST assessment to worker using a template held on the council's intranet.
2186	23/24	Agency staff and Consultants - Implications of IR35	Managers have not received any specific training in relation to the IR35 legislation. There is no separate corporate induction checklist for senior managers.	31/03/2025	31/03/2025	In Progress	February 2025: The Personnel Committee has approved the updated Use of Temporary Workers Policy. HR now needs to roll out training for managers.
2575	22/23	Climate Change	Performance Monitoring and Reporting needs further definition and improvement.	01/04/2024	01/04/2024	Overdue	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.
2572	22/23	Climate Change	The action plan is not SMART (specific, measurable, achievable, realistic and timely).	01/04/2025	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.
2574	22/23	Climate Change	There is no dedicated body/committee with oversight of the Climate Change Strategy.	01/04/2025	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.



## Appendix D: Monitoring of Agreed Actions

4985	24/25	Corporate Property Health & Safety	The compliance spreadsheet does not reflect the correct interval for fire alarm maintenance checks. Additional emergency lighting tests take place but are not separately recorded in the compliance spreadsheet.	01/06/2025	01/06/2025	In Progress	<i>New issue</i>
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	February 2025: The Cranbrook Town Centre Master Plan has now been adopted and an implementation plan reported to the Cranbrook Placemaking Group. Further work on RAID management still needs to be completed.
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	February 2025: The Housing service has advised they have analysed damp and mould issues identified through the stock condition survey and matched back to order records to ensure issues are being remediated when identified. We have requested evidence of this.
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.
809	22/23	Debtors (Accounts Receivable)	Sundry Debtor procedures are incomplete.	31/10/2024	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.
5554	24/25	Disabled Facilities Grant (DFG) Process	Quality monitoring & review of completed works	31/01/2025	31/01/2025	Overdue	<i>New issue</i>
5553	24/25	Disabled Facilities Grant (DFG) Process	Selection of contractors for works	01/04/2025	01/04/2025	In Progress	<i>New issue</i>

## Appendix D: Monitoring of Agreed Actions

<b>3865</b>	23/24	Elections	There are gaps in terms of the the Data Sharing Agreements that the team is required to have in place	30/09/2024	31/12/2024	Overdue	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.
<b>3864</b>	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.
<b>2053</b>	23/24	Emergency Planning	The council does not hold its own Local Risk Register.	01/01/2025	31/03/2025	Evidence Check	February 2025: Reported as completed, evidence check in progress.
<b>3177</b>	23/24	Establishment Control	There are no establishment reconciliations outside of the annual budget setting process.	31/12/2024	31/12/2024	Overdue	October 2024: HR is meeting with Finance in November 2024 to discuss and agree what process is needed going forward.
<b>5310</b>	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	Overdue	
<b>4823</b>	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	Overdue	
<b>4817</b>	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	Overdue	
<b>4822</b>	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	Overdue	
<b>4824</b>	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	Overdue	

## Appendix D: Monitoring of Agreed Actions

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	
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	
4474	23/24	Housing Electrical Safety	The Housing service does not retain evidence confirming reported KPI figures.	31/10/2024	01/04/2025	In Progress	
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: Housing reported that spot checks have now been introduced. Evidence is required to close the action.
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	February 2025: Housing has provided evidence of two recent Tenant Satisfaction Measure surveys completed by third party providers. Outcomes from the surveys have been reported to Housing Review Board. We are awaiting repairs satisfaction data from the service.
2796	23/24	Housing Whistleblowing Concerns Follow Up	Job Completion Workflow	30/06/2022	01/04/2025	In Progress	October 2024: Housing is conducting of review of open jobs that have been left open on the OneHousing system. Housing still has concerns that officers are not recording all information in the right place, and intends to build this into the officer performance management process.
2918	23/24	Housing Whistleblowing Concerns Follow Up	Job Completion Workflow	30/06/2023	01/04/2025	In Progress	October 2024: The Housing Systems team is looking at possible system fixes that will prevent potentially contradictory or misleading information in status fields. Housing has introduced weekly validation of works orders and this process is identifying issues more quickly.
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	Overdue	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

## Appendix D: Monitoring of Agreed Actions

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	Overdue	around the DRP schedule are ongoing at the Information Governance working group. October 2024 This action is now on track.
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	Overdue	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.
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.
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	February 2025: Progress was delayed because of extended absence of HR Lead. HR is developing a scheme but this may necessitate changes to employee contracts. The new policy will need to be approved by Personnel Committee.
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.
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

## Appendix D: Monitoring of Agreed Actions

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	<p>new system that will have better reporting functionality and can provide forecast data.</p> <p>February 2025:</p> <p>The council has introduced a new Council Plan which includes 46 key actions linked to 105 success measures. The first reports using the new key actions and success measures were presented to Cabinet in November 2024.</p> <p>The Management Information Officer is using a spreadsheet to monitor performance against the new metrics until the new InPhase system is implemented in early 2025.</p>
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	<p>October 2024:</p> <p>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.</p>
2916	23/24	Performance Management	Indicators are not always complete, despite reminders.	31/03/2024	31/03/2025	In Progress	<p>October 2024:</p> <p>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.</p>
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	<p>October 2024:</p> <p>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.</p>
4360	24/25	Planning Application Fees	There is no active reconciliation between payments made through the planning	31/08/2024	31/08/2024	Evidence Check	<p>February 2025:</p>

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			portal, or using the online payment tool, and the income received into the relevant account code in efinancials.				
785	/21	Procurement	Project Notification Forms (PNFs) are not always completed as required.	29/02/2024	29/02/2024	Overdue	Planning has attempted to introduce a reconciliation, but due to variables in the systems involved and timings and methods of payments, they have found this difficult to do efficiently and effectively. Officers are looking into alternative methods. 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.
5026	24/25	Procurement Cards	Lack of specific fraud and card training	30/06/2025	30/06/2025	In Progress	New issue
5029	24/25	Procurement Cards	Sharing of cards	30/06/2025	30/06/2025	In Progress	New issue
5137	24/25	Procurement Cards	Unsigned monthly summary sheets	30/06/2025	30/06/2025	In Progress	New issue
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.
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.	29/03/2024	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.
793	21/22	Risk Management	Not all Service Planning Risks appear on the risk register.	31/03/2024	31/08/2025	In Progress	February 2025: This is still a work in progress. The council has been undergoing a risk review. Directorate plans for 2025/26 have been produced but these do not include service level risks. Council Plan risks have been aligned to those on the corporate risk register for the Finance directorate, but risk reviews are still ongoing. The Management



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795	21/22	Risk Management	Risks are not aligned to council priorities.	31/03/2024	31/08/2025	In Progress	Information Officer is recording information on a spreadsheet so this can be uploaded onto the new InPhase system when this goes live. February 2025: This is still a work in progress. The council has been undergoing a risk review. Directorate plans for 2025/26 have been produced but these do not include service level risks. Council Plan risks have been aligned to those on the corporate risk register for the Finance directorate, but risk reviews are still ongoing.
804	21/22	Small Works and Services Contract Management	The Contract Standing Orders do not explain how smaller contracts should be monitored.	31/03/2024	31/03/2024	Overdue	February 2025: We expect that all of the outstanding actions from this audit will be superseded by the planned Contract Management audit that will take place in the first half of 2025/26.
805	21/22	Small Works and Services Contract Management	No Contract Management guidance available for contract managers	31/03/2024	31/12/2024	Overdue	February 2025: We expect that all of the outstanding actions from this audit will be superseded by the planned Contract Management audit that will take place in the first half of 2025/26.
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	30/04/2025	Evidence Check	February 2025: The Audit and Governance Committee approved the updated Partnership Policy in November 2024. The policy includes a model partnership agreement that the Link Officer can refer to so as to ensure the minimum partnership requirements are obtained. The next Partnership Review is due to be presented to the Committee in March 2025.
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	30/04/2025	Evidence Check	February 2025: As part of the next Partnerships Review, managers will be asked to declare how each partnership supports the council's corporate objectives. The next Review is due to be presented to Audit and Governance Committee in March 2025.
3317	23/24	Strategic Partnerships	Not all partnerships identified in service plans appear on the partnership register.	31/05/2024	30/04/2025	In Progress	February 2025 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

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							specific information. This does not include details of relevant partnerships. This may be re-introduced for 2026/27. However, current partnerships should be captured via the annual Partnership Review.
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	30/04/2025	Evidence Check	February 2025: The new Partnership Policy introduces a requirement for annual self-assessments of partnerships, to be signed off at director level. Evidence check ongoing.
5288	24/25	Treasury Management	The Finance service has not kept evidence showing authorisation for loans it has taken out.	30/11/2024	30/11/2024	Overdue	New issue
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	
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	
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	Evidence Check	February 2025: The updated Use of Volunteers Policy specifies that the supervisor must ensure that the volunteer is aware of the relevant risk assessment and control measures in place, and that the council will provide training if the volunteer is expected to work alone. We have requested further information to confirm volunteer role risk assessments have been completed.
3572	23/24	Volunteer Management	There are variations in performance management and supervision arrangements for Gallery and Countryside volunteers.	30/04/2024	31/01/2025	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 Internal Audit 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	Confidential Request #4 (3630)	Final	N/A	0	0	0	0
N/A	Confidential Request #2 (3271)	Final	N/A	9	1	8	0
N/A	Confidential Request #1 (3026)	Final	N/A	11	1	8	2
Assurance	Corporate Property Health and Safety	Final	Reasonable	4	0	0	4
Assurance	Treasury Management	Final	Reasonable	6	0	2	4
Assurance	Disabled Facilities Grants Process	Final	Reasonable	6	0	2	4
Assurance	Procurement Cards	Final	Limited	10	0	3	7
In progress							
Assurance	Supplier Resilience	In progress					
Assurance	Temporary Accommodation	In progress					
Assurance	Business Continuity	In progress					

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Audit Type	Audit	Status	Assurance Opinion	Total Actions	1 = Major	↔	3 = Medium
					Recommendation		
					1	2	3
Assurance	Budget Monitoring	In progress					
Assurance	Local Government Transparency Code	In progress					
Follow Up	Strategic Partnerships	In progress					
Advisory	<b>NEW:</b> Project Management Framework	In progress					
N/A	<b>NEW:</b> Confidential Review #5 (3852)	In progress					
Assurance	Housing Voids	In progress					
Assurance	Payroll	In progress					
Not started							
N/A	<b>NEW:</b> Confidential Review #6 (3826)	Not started					
Deferred and Removed							
Assurance	Community Safety/Anti-Social Behaviour	Deferred	Deferred to 2025/26 due to service restructure. Included in the proposed 2025/26 Half 1 Internal Audit Plan.				
Assurance	Firmstep – GDPR Compliance	Deferred	Deferred due to anticipated DWP review.				
Assurance	Project Management of Major Engineering Schemes	Deferred	Deferred due to service resource pressures. Replaced with Project Management Framework advisory review.				
N/A	Confidential Request #3 (3272)	Removed	Officers completed work that means this review is no longer needed. Replaced by Confidential Request #5.				
Assurance	Creditors	Deferred	Deferred due to make room for confidential audit requests.				

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Audit Type	Audit	Status	Assurance Opinion	Total Actions	1 = Major	↔	3 = Medium
					Recommendation		
					1	2	3
Assurance	Section 106 and CIL	Deferred	Deferred to 2025/26 due to make room for confidential audit requests. Included in the proposed 2025/26 Half 1 Internal Audit Plan.				