AGS Ref	Area of Assurance	Gap Identified	Agreed Action	Responsible Officer	Timescale	Update August 2012
1.3 New	Effective procedures to identify, evaluate, communicate, implement, comply with and monitor legislative change exist and are used	Quarterly legislation tracker no longer produced by legal	Legal &Governance Services to explore a cost effective way of ensuring legislative changes are identified	Director of Legal & Governance Services	Nov 2011	Legal officers report legislative changes to CSB, and specific committees as legislative changes occur as well as provide training and updates to relevant officers/members.  A monthly Policy Bulletin is produced by the Chief Executive's Office and issued to Members, CSB, CLG, Policy & Scrutiny Officers and Finance Business Partners containing updates on new legislation.  The 2011/12 Management Assurance Exercise sort assurance from managers that relevant legislative changes are picked up. Lists of new legislation provided by managers as part of the exercise were reality checked by Legal services to ensure all key pieces identified. This was working well across all Directorates for 2011/12.
						GAP closed

4 7	Old and a second of	NI.	A select Office Front Contract	1 4 1 1 2 - 1 - 5	N. 0044	D 11. OOD 00/44/44
1.7 c/f	Objectives are reflected in departmental plans and	No corporate requirement for services within	Assistant Chief Executive to produce paper for CSB	Assistant Chief Executive	Nov 2011	Report to CSB 23/11/11 plus new service planning
071	are clearly matched with	Directorates to have	consideration on how to close this	Excounte		guidelines issued in
	associated budgets	Service Delivery Plans.	gap. (as agreed by CGG 09/08/11)			January 2012.
						GAP closed
3.4	There is a counter fraud	Policy accessible on	Intranet to be enhanced to enable	Corporate Anti-	Nov 2011	The CAFT pages have
c/f	and corruption policy in	internet site but only via	policy to be more accessible to	fraud Service		been updated on the hub so that there is now
	place which has been formally approved,	search facility on intranet (CAFT have no specific	staff.	Manager (with help from		information surrounding
	regularly reviewed and	pages).		Information		fraud affecting the
	widely communicated to	No overence consists	Corporate fraud awareness e-	Management)	March 2012	authority and how
	all relevant staff.	No awareness sessions etc. are run.	learning tool to be developed inhouse.	Corporate Anti-		employees can report it. There is no direct link to
				fraud Service		the Corporate Anti-Fraud
				Manager		Policy as this is under
						review.
						The government has
						recently launched a new
						'Fighting Fraud Locally' strategy and toolkit for
						implementation in local
						government and part of
						this toolkit is a free fraud awareness package
						endorsed by CIPFA that
						authorities can roll out
						within their organisation. The latest timescales for
						release are May 2012 so
						moves will be made after
						release to incorporate this within Harrow's learning
						pool so that all new
						starters complete the
						course and existing staff can dip in an out as and
						when.
						GAP partially closed,
						ongoing 2011/12

3.7	Where a scheme of	Management Assurance	Reminder on the requirement for a	Assistant Chief	September	Action implemented via
New	delegation has been	Exercise identified	directorate/service specific scheme	Executive/Dire	2011	CSB August 2012.
INCW	drawn up, it has been	directorate/service	of delegation to be put in place to	ctor of Finance	2011	OOD August 2012.
	formally approved and	specific schemes of	be sent to all Corporate Directors.	Clor of Finance		2011/12 Management
	communicated to all	delegation covering HR /	be sent to all corporate birectors.			Assurance Exercise
	relevant staff	service specific	Evidence of delegations in place to			shows a 2% corporate
	Televanii Stan	•				
		responsibilities not	be provided to Internal Audit.	Corporato	Doc 2011	improvement to 58%
		consistently in place		Corporate	Dec 2011	working well.
		across the Council		Directors		0.4.0 -/5.004.4/4.0
<del></del>						GAP c/f 2011/12
3.34	There are up-to-date data	There is no consistent	Paper to CSB to be produced to	Divisional	November 2011	Action not implemented.
c/f	security policies and	approach for validating	address the GAP	Director -		
	guidance in place	information from third		Partnership		Directorates are aware
	covering:	parties as it is the		Development		however no mechanism
	covering.	responsibility of the		& Performance		in place to obtain
	key business areas	contract 'owner'				assurance.
						Information Management
						Team now taking this on.
I						The data Quality Policy
						will be reviewed and
						communicated to
						managements using the
						new policy compliance
						software.
						GAP c/f 2011/12

AGS Ref	Area of Assurance	Gap Identified	Agreed Action	Responsible Officer	Timescale	
3.37 New	The council manages information risk effectively. Arrangements meet the requirements expected in government including having a capable Senior Information Risk Owner (SIRO). The council complies with the requirements set out in any relevant codes of connection for services it has in place, for example the Government Secure Intranet / Government Connect.	The Council has complied with the Governments Code of Connection and was formally certified on 1st Sept 09 and updated 29/07/11. However CAFT moved 01/08/11 to open plan office that does not, in the opinion of the CAFT Service Manager and the Information Management Service Manager comply with the relevant code of connection:  All hosts and network equipment are to be located in secure accommodation	Plan to be developed to address how to meet requirements.	Corporate Anti-fraud Service Manager/ Service Manager - Property	November 2011	The latest compliance statement for GCSX submitted in July 2012 stated: All hosts and networking equipment are located in locked secure accomodation.  In addition: GCSx users are restricted to defined areas at two physical locations (Civic1 and Civic 6 buildings) at Harrow Council. Their access to the GCSx system is controlled via firewall rules  Therefore there remain the risk that the open plan nature of the accommodation will not be deemed suitably secure.  GAP c/f 2011/12

3.38 New	The council incorporates good practice standards and specified public sector policies on data and information security into its own policies and procedures. For example, ISO27001 and relevant Codes of Connection for the NHS Network (N3) and Government Secure Intranet and Government Connect.	In order to improve on data security, the Council has commissioned a gap analysis exercise (Dec 09) to help identify gaps in data security practices to enable us to imbed an ISMS to ISO27001 standards.  Capita and the Council are now working together to implement some of the gaps to imbed an ISMS to ISO standard.	Action identified and agreed in ISMS/ISO action plan therefore no action required here.	Tony Monachello	N/A	When Capita took over the ITO a full suite of policies was implemented by the Capita ICT Security Manager that meeting ISO Standards and Capita and the Council continue working together to implement the gaps to imbed an Information Security Management System (ISMS) to ISO standard.  GAP partially closed, ongoing 2011/12
10.5 New	Develop protocols to ensure that the leader and chief executive (or equivalent) negotiate their respective roles early in the relationship and that a shared understanding of roles and objectives is maintained	No protocol currently in place	Protocol to be developed and agreed	Director of Legal & Governance Services	November 2011	Effective working relationship between Chief executive and Leader and although a draft protocol was drawn up by Legal, all parties concerned consider that formalising this process would not add any value.  Therefore not considered to be a gap in governance.
13.11 c/f	Joint workforce planning.	Although there is an integrated Children's Workforce Strategy and joint induction arrangements for those working with children across local partners this does not exist to any significant extent in other Directorates	This has been identified in the Strategy for People 2010-2012 as an action for 2011 therefore no further action is needed here.	Jon Turner	N/A	Workforce strategies and plans continue to be developed but are not yet in place in all Directorates. Where appropriate Directorate workforce strategies / plans include joint planning with partners  GAP partially closed, ongoing 2011/12

13.19	Ensure that career	There is no career-	This is reflected in the Strategy for	Jon Turner	N/A	To opposite an officers'
New	structures are in place for	planning programme in	This is reflected in the Strategy for People 2010-12 action plan	Joil Tulliel	1W/74	To encourage officers' participation and
INCW	members and officers to	place at the officer level	therefore no further action needed			development the
	encourage participation	place at the officer level	here.			Council's IPAD process
			nere.			
	and development					now requires managers
						to consider employees'
						career development
						aspirations. Directorate
						performance in ensuring all staff receive an annual
						IPAD review is monitored
						through Improvement
						Boards and the overall
						performance at the end of
						2012 was 85%.
						2012 Was 6576.
						Performance differs
						between Directorates and
						each Directorate has
						taken action to improve
						performance in
						preparation for the
						Council being assessed
						against the IiP standard
						in 2012.
						Where appropriate
						Directorate workforce
						strategies include
						developing career
						pathways and structures
						to enable effective
						workforce planning.
						The Member
						Development Programme
						includes skills
						development for
						members working to
						develop their political
						roles.
						10.00.
						GAP closed

AGS Ref	Area of Assurance	Gap Identified	Agreed Action	Responsible Officer	Timescale	
GF7 c/f	Making sure that an effective risk management system is in operation	No Business Continuity/IT Disaster recovery plan	Not in place for 2010/11. Will be complete by April 2012.  There are already some arrangements in place to meet this requirement (including an annual DR test) and a comprehensive range of improvements have been developed to ensure resilience and recovery capabilities as part of the new Capita IT contract.  One of the main projects to support this is the migration of the council's IT applications to the Capita West Malling site, which is due to commence in September on a phased programme which will be completed in April 2012.  There is a continuing risk until this project is complete although the wider business continuity plan takes this into account and the risk is no greater than it has been historically over a number of years.	Head of IT Client Team	April 2012	The move to West Malling is being re- evaluated against an alternative option to retain the data centre at the civic centre. A plan is now being put together to test DR of the systems as they stand.  SIGNIFICANT GAP c/f 2011/12
OGF8 c/f	Making sure that an effective risk management system is in operation	Health & Safety  Management Assurance Exercise identified that Health & Safety not working well across all areas of the Council.	A comprehensive review of H&S has been carried out and a new restructure and a two year improvement plan is commencing.  Progress against plan report to be provided to Internal Audit (at the request of Chief Executive)	Divisional Director Risk, Audit & Fraud	Dec 2011	Progress made i.e. audit tool rolled out, but will not be fully implemented until 2013 as it is a two year plan.  GAP partially closed, ongoing 2011/12

AGS Ref	Area of Assurance	Gap Identified	Agreed Action	Responsible Officer	Timescale	
3.42 c/f	The council engages with its staff and gains their commitment to, and ownership of, the council's approach to reducing its impact on the environment	Although a well publicised Energy Saving Campaign was run in 2008/09 it is recognised that a more pro-active engagement with staff is needed.  Reduced staffing levels and a freeze on recruitment during 2010/11 have meant that it has not been possible to devise a programme. We anticipate recruiting and initiating a programme in the Autumn	To devise a pro-active engagement programme on the council's approach to reducing its impact on the environment.	Head of Climate Change	Nov 2011	Not implemented due to lack of resources.  GAP c/f 2011/12