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AG Ref	Significance	Gap Identified	Agreed Action	Responsible Officer	Timescale	Updated Position March 2014	Current Status
1.5	Not Significant	Inconsistency in the existence of agreed quality standards in key service areas.	Assessment of the materiality of the inconsistency and whether a Corporate policy will add benefit.	Susan Dixson – Head of Internal Audit	Feb 2014	Combined with c/f 3.34	Substantially complete
1.7	Not Significant	Corporate Procurement Strategy in place covers 2009 – 2012 and a lack of a Corporate Contract Management Policy.	Corporate Procurement Strategy to be updated. Council wide contract management approach to be developed.	Terry Brewer – Divisional Director Commercial, Contracts & Procurement	Sept 2014	The development of a Commercial Strategy is well under way and integral to that will be the creation of a council wide contract management approach. We expect delivery of these respective pieces of work by June 2014.	Substantially complete
2.2	Not Significant	Contract Procedure Rules not regularly reviewed – last reviewed/updated 2009	CPRs to be reviewed in 2013.	Terry Brewer – Divisional Director Commercial, Contracts & Procurement	Dec 2013	Draft out for consultation. To go to Council in July via constitutional working group.	Substantially complete

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3.2	Not Significant	Corporate Anti-fraud Policy not up to date (c/f 11/12 3.4).	Already reviewed and updated – to be approved by GARM and included in the constitution.	Justin Phillips _ Service Manager CAFT	Jan 2014	Awaiting forward to policy from Leader & Head of Paid Service – being organised by Communications Team	Substantially Complete
3.6	Not Significant	During 2012/13 it was identified that a standard's complaint had not been referred in a timely manner.	Reporting lines will be reviewed for such cases to ensure that changes in structures do not in future impinge on the timeliness of complaints being passed to the Standards Committee.	Simon George – Director of Finance & Assurance	Sept 2013	Email sent to senior managers in Finance and Assurance, alerting them to the fact that they can refer issues directly to the Monitoring officer if they believe an issue is not being dealt with in a timely fashion	Complete
4.8	Not Significant	Risk Management Strategy annual review overdue – last reviewed/updated October 2011	To reviewed and updated	Susan Dixson – Head of Internal Audit	Dec 2013	This action remains outstanding due to the loss of the Risk Manager's post.	Outstanding
4.8	Not Significant	Loss of risk management expertise.	Plan to be developed to maintain core elements of risk management.	Susan Dixson – Head of Internal Audit	Sept 2013	The plan is that the Internal Audit team will maintain and update the Corporate Risk Register with an allocation of time to achieve this in the Annual Plan.	Complete
4.9	Not Significant	Whistleblowing Policy in place for staff but is not made available to members of the public, partners or contractors.	Policy to be reviewed and updated.	Hugh Peart – Director of Legal & Governance Services	Dec 2013	The policy has been updated and will be published on the Harrow website in April 2014.	In progress

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5.3	Not Significant	The Council's Training & Development Plan does not specifically cover governance training.	An e-learning tool is currently being developed.	Lesley Clarke – Organisational Development Manager	Nov 2013	The complexity of governance requirements is resulting in the need to establish a broader range of e-learning than originally planned. This is, however, underway and will be completed by April 2014.	Substantially complete
7.2	Not Significant	BC team unable to confirm that all Divisions have up to date BC plans.	Exercise currently underway to develop/update BC plans across the Council.	Kan Grover - Service Manager - Emergency Planning & Business Continuity	Nov 2013	Across the council, 84% of BC Plans have been reviewed (Green), 14% of BC Plans are currently being reviewed (Amber), and 2% of BC Plans are still due for review (Red).	Substantially completed
7.2	Not Significant	Harrow IT Business Continuity/Disaster Recovery Plan not finalised – user acceptance testing delayed until Q1 13/14 not complete. (in part c/f 11/12 GF7)	User acceptance testing has been completed except for the SRM (Procurement) element of SAP as a new remote access disaster recovery solution is currently being developed. Once implemented this will be tested	Rahim St John - Head of Business Transformation Partnership	Dec 2013	User acceptance testing now complete	Complete

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| 7.6 | Not Significant | The council can not demonstrate it applies policies and procedures consistently and there are no mechanisms in place to check this based on risk. Implementation of new policy compliance software due Q1 13/14 has been delayed. (c/f 11/12 3.35) | Procurement process at contract negotiation stage – ironing out technical details – if satisfactory will proceed with purchase and be in place by end of year. | Tony Monachello - Service Manager, Information Management | March 2014 | Cost of installing & operating software has doubled. Consideration being given to whether it is now a cost effective solution.

The solution to mitigate this is gap will be reconsidered in the 2013/14 annual governance review. | Outstanding |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 7.9 | Significant | Application to the PSN Code of Connection (Government Connection) has been rejected on the basis that the scope, which only covered the secure part of the network, was too narrow. | Re-submission covering the whole network | Rahim St John - Head of Business Transformation Partnership | Oct 2013 | Harrow has been passed as PSN compliant from July 2013 –July 2014 | Complete |

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7.10	Not Significant	The council can not currently demonstrate it is reducing the number, severity, or both, of security incidents – raised awareness & introduction of improved reporting has increased the level of incidents reported in the short term.	To be monitored over the year on a quarterly basis as part of the Breaches Register and Incident Management Procedure. Reported to the Resources Improvement Board. Historic data will enable comparison	Tony Monachello - Service Manager, Information Management	March 2014	A year-end report to be produced and taken into account in the 2013/14 annual governance review and reported to GARM in June 2014.	In progress
c/f 3.7	Not Significant	Directorate/Service Specific schemes of delegation covering HR/service specific responsibilities not consistently in place across the Council.	Review of delegations in the 2013/14 IA Plan.	Susan Dixson – Head of Internal Audit	Dec 2013	Review planned but delayed due to unplanned investigation.	Outstanding

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c/f 3.3 4	Not Significant	Data Quality Procedures not up to date.	Internal Audit to undertake a review of the procedures	Susan Dixson – Head of Internal Audit/Alex Dewsnap - Divisional Director Strategic Commissioni ng	Jan 2014	Data Quality procedures have been drafted by Strategic Commissioning and audit review nearing completion.	Substantially Complete
c/f 13. 11	Not Significant	Resources Workforce Strategy not finalised.	To be finalised.	Tom Whiting	Nov 2013	Resources Workforce Strategy now finalised.	Complete

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c/f 16.5		No separate bank account for WLWA (raised by External Auditors in August 2012. Plans are in place for a separate bank account from April 2014. The External Auditors are not overly concerned, and the Director of Finance and Assurance has agreed to produce a separate working paper for the External Auditors to provide additional assurance.	Separate Bank Account from April 2014	WLWA Treasurer	April 2014	Arrangements made to transfer to a separate bank account from April.	Complete

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c/f 16.6		Formal Financial Procedure to be drafted as part of new Financial Procedure Rules to cover the removal of ledger codes from the chart of accounts (caused on issue in the draft financial statement for 2011/12).	To be drafted.		Hasina Shah	Dec 2013	A table has been drawn up showing the authorisation required for changes to cost centres and cost elements including removal of ledger codes from the chart of accounts (which requires the approval of the Chief Accountant) and this has been circulated to all relevant staff.	Complete