

**HIGH RISK RECOMMENDATIONS NOT AGREED FOR IMPLEMENTATION**  
(Already reported mid-year)

Review	Risk Rating	Recommendation	Management Response	Audit Comment
Aylward Governance & Finance	High	Orders should be placed in advance of expenditure and before the receipt of goods other than agreed exceptions in accordance with Financial Regulations. This will ensure that the school are complying with laid down procedures and will avoid the lack of commitment on FMS6 resulting in inaccurate budgetary control information.	The orders in this instance related to contracts approved by the Governing Body and placed with contractors and leasing companies approved by the Local Authority and charges included in the annual budget. We have been following the Local Authority Procedure Note in the Schools Financial Handbook relating to Orders (Pg 43 – Exceptions) regarding these invoices. In no way, can this be a potential high risk of fraud as the ordered/leases were placed with the full approval of the governing body and in line with Local Authority procedure.	The issue for this control is not of prior authorisation of the transaction but rather of ensuring that there is a commitment for the expenditure. Where the order is not placed in advance of the receipt of goods or invoice there is a lack of commitment on the system against the cost centre budget which may result in a poor decision being made because of inaccurate information. Where the commitment is shown the budgetary information is more up to date therefore providing better quality information for decision making.
Aylward Governance & Finance	High	The FMS comments are reiterated in that the school should seek to obtain the appropriate number of quotes as required under Contract Procedure Rules in the first instance and in exceptional circumstances, where appropriate, justify and approve a waiver. This will help to demonstrate value for money and demonstrate compliance with Contract Procedure Rules.	We adhere religiously to Contract Procedure rules and have copious documentation and appropriate quotes to support this. The Governing Body and Finance & Premises Minutes together with supporting documentation confirm that all orders are appropriately researched, discussed by governors and approved.  The instances cited in the audit report relate to an incorrect Form being used (Project Approval Form rather than a Waiver Request Form) and not inappropriate use of the Contract Procedure Rules. This was clearly proved to the Audit staff, but has not been accurately reflected in the report.	A waiver is used to approve an exceptional case, either in an unforeseen emergency, or where it has not been possible to obtain the relevant number of quotes and due to time constraints the decision needs to be based on fewer quotes. Therefore the waiver is a specific procedure to request approval for not applying the specific Contract Procedure Rule (e.g. for 3 quotes) on that occasion at the same time as indicating the basis for the particular supplier being accepted. Thus the approval of a waiver demonstrates compliance with Contract Procedure Rules. The school has not specifically obtained the authorisation to allow it not to comply with the Contract Procedure Rule. Therefore there is a lack of compliance with Contract Procedure Rules.

**APPENDIX D**

<b>Review</b>	<b>Risk Rating</b>	<b>Recommendation</b>	<b>Management Response</b>	<b>Audit Comment</b>
Emergency Relief Payments (Harrow Help Scheme)	High	It should be ensured that the team undertake Experian checks for significant awards that are given i.e. the amounts where further authorisation is required.	It is felt that this is not proportionate to the value of funding paid for one off payments. The process for higher value awards is aligned to Housing Benefit payments with verification of original evidence required to support the application.	Whilst it is appreciated that the majority of payments are low level amounts and for these an experian check is not undertaken, an experian check is recommended for the larger paid amounts to ensure that payments are not made to people who have undeclared assets and are therefore not entitled.

FOLLOW UPS – HIGH RISK RECOMMENDATIONS PART IMPLEMENTED/IN PROGRESS/PLANNED OR NOT IMPLEMENTED

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
<p>Accounts Receivable Key Control</p>	<p>The Shared Services Technical Team should not accept a journal upload request email unless it has been sent by an authorising manager. Where a journal request email is not received from a manager it should be returned to the officer informing them that the journal will not be processed until the email has been resent from the appropriate manager. Also a communication should be sent to all relevant staff informing them of the new process and that locally the journals should be signed by a manager and retained as evidence. This will ensure that the authorising officer is raising the journal. This will also minimise the reputational risk to the Authority of an inappropriate or incorrect debt being raised</p>	<p>A communication will go out to the business.</p>	<p><b>Implementation Date:</b> October 2012  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>This has not yet been actioned. It will be looked at this once the officer involved has returned to work.</p> <hr/> <p><b>Second follow up response</b> Not implemented for the reasons reported above.</p>	<p>Slow Implementation</p> <p>The Service Manager does not think this is viable as there will be delays in invoices being raised. Also, there are specific staff assigned to carry out these tasks (i.e. Business Support staff). There is also an assumption that we know who the manager is. Not implemented</p> <hr/> <p><b>Re rated as</b> Not implemented</p>

**APPENDIX D**

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Accounts Receivable Key Control	All staff responsible for raising debtor accounts either through the FB70 screen, journals or by completing a request form should be reminded that their calculations for the invoice amount should be checked by a second employee to ensure the debt is correct. Staff should also be reminded that this check should be evidenced i.e. the 2 <sup>nd</sup> officer should sign the supporting paperwork. This will minimise the risk of debt being raised incorrectly and requiring subsequent amending which would lead to customer dissatisfaction/poor reputation.	Request Forms - A reminder email will be sent to all requestioners advising them of this and advising that invoices received that have not been checked by a 2 <sup>nd</sup> officer will be returned. Access Harrow will be sending a reminder to staff as well as including an item in a newsletter	<p><b>Implementation Date:</b> October 2012</p> <p><b>Follow Up</b> February 2013</p> <p><b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>Currently both CAP and SAP Support will carry out checks to verify the calculations are correct. For requests that are received outside of the webforms or Journal uploads these are copied to Civica so an audit record can be held. Reminder to be sent</p> <p><b>Second follow up response</b> Not sure of the benefits of this recommendation. If the calculation does not add up then the SAP support team return the invoice request.</p>	<p>Slow implementation</p> <p><b>Re rated as</b> Not implemented</p>

**APPENDIX D**

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Transformation Programme Engagement & Culture Change - Procurement	There will be a need to revise the planned learning development activities for the Procurement project to reschedule and repeat these once the SAP elements have been changed and developed. All officers involved in procurement both at a manager and staff level should have suitable training on the procurement aspects of SAP as well as a reminder of the more general processes of compliant procurement and training in contract management skills. Without rescheduling of this training there is a risk that behaviours in relation to procurement and contract management will not be developed and the level of savings required will not be made (or sustained).	Agreed and already started with the preparation and implementation of the SAP/SRM upgrade in early November	<p><b>Implementation Date:</b> Ongoing</p> <p><b>Follow Up</b> February 2013</p> <p><b>2<sup>nd</sup> Follow up</b> June 2014</p>	SAP requisition training has been completed. There are currently 120 requisitioners. Following the training sessions there were open surgeries conducted and internet – procurement pages updated with good practice guides. There is now a SAP/SRM forum open for all comments. The managers training has been deferred till Autumn in order to combine it with the Managers Finance training.	<p>Slow implementation</p> <p>The current Divisional Director Commercial, Contracts &amp; Procurement has only recently started with the authority and is the 3<sup>rd</sup> officer to have been involved with this review. A meeting is being held to follow up the implementation of these outstanding high risk recommendations.</p>

**APPENDIX D**

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				<p><b>Second follow up response</b>            A number of pieces of work are being progressed currently, these include:            - Review of Contract Procedure rules            - Contract Management Procedures            - Sponsorship Code            - Procurement Card Policy            - Commercial &amp; Procurement Strategy            To aid the implementation of these at management level, they are being taken through the Operations Board for consideration and training sessions will be arranged to take CLG and other management levels through the new procedures. This training will be supplemented by updated procurement pages on the intranet and procurement 'surgeries'.</p>	<p><b>Re rated as</b>            Part implemented/in progress – on-going</p>
<p>Transformation Programme Engagement &amp; Culture Change - Procurement</p>	<p>The monitoring of the progress, against specific timescales, of the Procurement Project through the action plan and Service Plan should continue to ensure that adequate progress is maintained and to enable blockages to be identified and resolved in future</p>	<p>Agreed, as per recommendation 15 above</p>	<p><b>Implementation Date:</b> March 2013   <b>Follow Up</b> February 2013  <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>The monitoring arrangements have been inconsistent across the Council and we are trying to consolidate the reporting to formalise the arrangements across all Directorates. The key monitoring information needs to be routinely collected and reported. (eg savings against MTFS) Service plan needs to be rewritten to reflect the changes in the transformation programme.</p>	



**APPENDIX D**

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Transformation Programme Engagement & Culture Change - Procurement	There should be an ongoing review of the benefits achieved in the Procurement Project against the actual expenditure periodically throughout the rest of this project as well as a full review at the end of the project. This is partially because the savings aspect of the benefits depends on the delivery by Directorates but also the cost of the project needs to be seen in this context. However to do this there needs to be a clear process for capturing and agreeing the savings achieved that enables these specific benefits to be transparently demonstrated. Failure to achieve the benefits particularly in terms of savings and the dependency on the rest of the organisation to deliver them could have a detrimental impact on future savings or increase the level of savings that have to be made by other projects. There is a risk that significant increases to the costs of the project could result in Directorates being less inclined to achieve savings targets	Agreed	<b>Implementation Date:</b> April 2013  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014	There is still a need to agree how this will be measured and this needs to be done with the Director of Finance.	Part/in progress
				<b>Second follow up response</b> Complete.	<b>Re rated as</b> Implemented - on-going



**APPENDIX D**

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<p>Contract Monitoring – Community &amp; Environment</p>	<p>In compliance with Financial Regulation and Contract Procedure Rules, it should be ensured that SAP orders are raised before work commences on site so that the commitment is raised on the system and to avoid budget overspends and this should be re-iterated to all relevant staff. It should further be ensured that work is not allowed to commence on site until the gateway documentation is fully authorised (where required) to avoid the risk of unauthorised works/services. It should further be ensured that the monthly SAP non-compliance spreadsheet is fully examined and all incidences of non-compliance highlighted and discussed.</p>	<p>Response as for recommendation 31 above. Agreed. A management instruction will be issued to this effect. Recognising that there may be exceptional circumstances where work needs to start before orders are placed and documentation fully completed the need for a fast track waiver will be explored and recommendations made. A management instruction will be prepared in conjunction with Finance and Legal colleagues setting out the protocol to be followed in the event that it is found after.</p>	<p><b>Implementation Date:</b> December 2012  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p><b>Apollo contract:</b> Not aware of a written instruction but it was reiterated verbally by Interim Major Works Manager and staff are fully aware of what needs to be done. Formal management instruction to be issued as part of finalising process and governance review Sept 13.</p>	<p>Part/in progress</p>
				<p><b>Second follow up response</b> Apollo: following a re-structure, the property team no longer exists. Education have their own team to deal with building projects, headed up by Mark Sperring. It is understood that Apollo are delivering those projects although the contract is up for renewal.</p>	<p><b>Re rated as</b> Not implemented</p>

**APPENDIX D**

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<p>Contract Monitoring – Community &amp; Environment</p>	<p>For all current contracts a review should be undertaken as to whether risk registers are in place for those with a value of £50,000 and over in compliance with Contract Procedure Rules, paragraph 34.2. Risk registers should therefore be drawn up for all appropriate contracts where risk registers are not already in place to assist with ensuring that risk management is fully embedded into the contract monitoring system and that risks are adequately monitored and managed. The Interim Risk Manager should be contacted in this respect to provide advice/training to C&amp;E on setting up the contract risk registers</p>	<p>Agreed and actioned for 3 contracts in that training has been provided by the Interim Risk Manager and risk registers have been drawn up (and will be drawn up for the new arboricultural services contract when it commences in January 2013). For the leisure services contract which now falls under Community Health and Wellbeing, risks are managed through the Community Health &amp; Wellbeing Contract Board and already through the quarterly meetings.</p>	<p><b>Implementation Date:</b> January 2013  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p><b>Apollo contract:</b> Not yet done as the reorganisation is taking longer than anticipated at the time the implementation date was set. Anticipated implementation date Oct 13. <b>Fraikin contract:</b> Completed and previously sent to audit. <b>KGB contract:</b> Risk register in place for contracts over £50k. <b>GLL contract:</b> A Risk Register for the Contract with Greenwich Leisure Limited (GLL) is now in place. <b>Gristwood &amp; Toms contract:</b> Risk register in place</p> <p><b>Second follow up response</b> As for above recommendation. Risk registers in place for other contracts</p>	<p>Part/in progress</p> <p><b>Re rated as</b> Substantially implemented</p>

**APPENDIX D**

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<p>Contract Monitoring – Community &amp; Environment</p>	<p>Once risk registers have been set up for all appropriate contracts, a system should be introduced to monitor and manage risks regularly (i.e. at least quarterly) to ensure that all registers are kept up to date and consistency applied in the contract management procedures</p>	<p>Agreed. Quarterly reviews will be carried out.</p>	<p><b>Implementation Date:</b> On-going  <b>Follow Up Due:</b> July 2013</p>	<p><b>Apollo contract:</b> Not yet done as the reorganisation is taking longer than anticipated at the time the implementation date was set. Anticipated implementation date Oct 13. <b>Fraikin contract:</b> Reviews carried out. <b>KGB contract:</b> Risk registers to be reviewed at the same time as providing information for scorecard i.e. quarterly. <b>GLL contract:</b> Risks are reviewed at the monthly CHW Directorate Contracts Board and at the Quarterly Update Meetings with GLL. <b>Gristwood &amp; Toms contract:</b> 6 month review</p> <p><b>Second follow up response</b> As for the above recommendation. In place for the other contracts</p>	<p>Part/in progress</p> <p><b>Re rated as</b> Substantially implemented</p>

**APPENDIX D**

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Mobile Phones	<p>The Policy, procedures and guidance in relation to mobile phones and devices that use mobile phone lines needs to be significantly revised and strengthened. To achieve this the Policy needs to have a recognised owner, adequate consultation of all relevant parties in its development so that the roles and responsibilities are agreed and can be applied effectively across the Council. It is important that the procedural elements are clearly defined and documented. Once approved this will need to be issued to all existing and new users and signed for as this will include new procedures and it is likely that the terms and conditions of use will have changed. The attached appendix indicates the expected controls that should be included in re-designing the system and that can be used to shape the Policy, procedure and guidance documents. The Policy, procedure and guidance</p>	<p>A new Policy is being developed by the Mobile &amp; Flex project team which will also incorporate the requirements of the Mobile and Flex project. Policy to be agreed. Arrangements for future administration of mobile phone usage and demand to be finalised. The development of a new policy should precede the competition exercise so that the Councils requirements are clearly identified. As this is likely to take some time to determine and the contract arrangements with Vodafone have already expired a negotiated extension of the service is recommended. (The negotiation should achieve lower costs and therefore is urgent).</p>	<p><b>Implementation Date:</b> May 2013</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>A new policy has been consulted on and agreed with relevant parties, with HRD as its owner, and in such a way as to apply to the developments through the Mobile and Flex project. Communications about the new policy took place in December 2013. The procedural elements have been defined in an updated in Terms of Use document by Procurement. The Policy, Terms of Use and order request will be issued for all new users and signed for before the equipment is issued. For existing users Procurement will issue the Policy and Terms of Use to budgetholders (with a list of the authorised device users for that budget) so that the existing users can sign and return Terms of Agreement form. Procurement will follow up any forms that have not been returned/ signed with the budgetholder</p>	Part/in progress

**APPENDIX D**

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	<p>documents need to be written in a way that would apply to a wider range of mobile technology (to fit in with future developments through the Mobile and Flex project). These should be available online and the processes and record keeping utilise as far as possible the Council IT systems (e.g. SAP, scanning etc.).</p>			<p><b>Second follow up response</b>            In addition to the mid year response, it is confirmed that all new users sign the necessary form. However it has not been possible to get all existing users (approx.. 1000) to sign new copies of the agreement forms.</p>	<p><b>Re rated as</b>            Part implemented</p>

**APPENDIX D**

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Mobile Phones	For the list of users where the individual has left the Council the current budgetholder (or manager responsible for authorising the issue of the device) should be contacted to confirm that the employee has left the Council and whether the device has been passed to another current employee or to confirm that the phone line should now be terminated. In either case the budgetholder (or manager) should ensure that updated information is provided and the device returned. If it needs to be re-issued a new user name can be applied and the new user would need to sign the terms and conditions. For the 68 devices that could not be clearly identified to a postholder the current budgetholder should be	Agreed – Procurement will update the exercise to validate users and provide the data to Directorates to confirm. The ‘clean up exercise’ will be piloted in Resources and then rolled out across other Directorates. The ongoing management will be addressed in the new administration arrangements.	<p><b>Implementation Date:</b> April/May 2013</p> <p><b>Follow Up</b> February 2013</p> <p><b>2<sup>nd</sup> Follow up</b> June 2014</p>	The tagging process has identified a number of phones/ devices that have been returned and re-issued to new users. Rather than cancelling lines they have been re-allocated and renamed to keep the cost of the contract down. The process of tagging devices is continuing (as above). There is also a new format available for the budgetholder to notify procurement of a change of user – which has been used. The new policy is aimed at employees (although where it is considered appropriate for agency staff to use a council mobile phone they would be expected to adhere to the same rules and complete the same documentation).	Part/in progress

**APPENDIX D**

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	<p>requested to confirm the correct employee name if a current employee, whether the employee has left or if the person is a consultant or agency staff. A policy decision will then be required to determine whether agency staff and consultants should be permitted to hold Council mobiles and, if so, how to control the return of these at the completion of their work for the Council.</p>			<p><b>Second follow up response</b> All phones have now been tagged and an inventory is held showing the tag numbers..</p>	<p><b>Re rated as</b> Implemented – on-going</p>
<p>Mobile Phones</p>	<p>A review of the user names used on the online system and documentation needs to be carried out so that each user name is distinct (and together with the mobile phone line number can be used as a unique identifier). As part of this process where the employee has multiple devices listed against their name enquiries should be made to confirm whether each device/ phone number has been allocated to an individual who can now be listed online and on documentation as being the current user. Where the phone/ device is for an individual user it would be helpful if the user name reflected exactly the way that the individual's name is given on the payroll system</p>	<p>Agreed – this will be addressed in the new administration arrangements.</p>	<p><b>Implementation Date:</b> May 2013  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>The development of the inventory spreadsheet through the tagging process has resulted in user names and e-mail details being updated so that each device that has been tagged has a user name and an e-mail address assigned to it. Thus the number of cases of multiple devices allocated to one individual has been reduced. There are some instances where an individual has both a phone and a dongle and a distinction is being added to the user name in the inventory to distinguish these. The tagging process is still being completed (as above).</p>	<p>Part/in progress</p>

**APPENDIX D**

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	- as this would make comparisons between the leaver data and the mobile phone data easier. All unique users should sign the Terms and Conditions of the new Policy (once determined).			<b>Second follow up response</b> As above. Tagging process is now complete.	<b>Re rated as Implemented</b>



**APPENDIX D**

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Mobile Phones	<p>A review should be carried out of the devices that currently have a generic user name or where there are more than one device for a named individual (or team) to determine two pieces of information:-</p> <ul style="list-style-type: none"> <li>• who is responsible for that device and</li> <li>• the name of the individual who currently holds that device or whether a unique generic name should be applied to the device.</li> </ul> <p>As far as possible user names should be unique and should be that of the individual who holds the phone (so that they can have clear responsibility for that device and be accountable for any personal use) and be supported by a signed copy of the Terms and Conditions of the new Policy. In exceptional circumstances where an individual has more than one device, that they are permanently responsible for, a distinction should be made in the user names. Where by necessity a device has a generic user name (e.g. a team name) this should be unique and there should be a clear person who has responsibility for the device. Where</p>	Agreed	<p><b>Implementation Date:</b> May 2013</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>As a result of tagging process, Procurement now holds a “Mobile Inventory” containing details of all tagged devices, including who they are allocated to, e-mail address and IEI number. Generic user names have been made unique with an assigned responsible person on the inventory. There are some instances of multiple devices listed against some names but the process described in 19 above will address this. With this improved level of information in the inventory this data could be used by services to undertake a review process. The wording of the new draft policy reflects that all users should sign the Terms and Conditions for a team device. Procedurally, within the Terms of Use document, the person who has signed the Terms of Agreement document will ensure that all users of a team device have read and understood the terms of use and acknowledged this.</p>	Part/in progress

**APPENDIX D**

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	a device is generic all members of that team who may use the mobile device should be listed and required to sign a generic Terms and Conditions document for the new Policy. Without this proper control of the mobile phone assets cannot be enforced and there is increased likelihood that the call charges will not be fully controlled and also of personal calls not being repaid			<b>Second follow up response</b> As above	<b>Re rated as</b> Implemented

**APPENDIX D**

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Mobile Phones	A revised process for the application, ordering and receipt of a mobile phone/ device should be documented complete with any revisions or additions to forms required to record this (as follows). All of these documents should be held in a retrievable filing system that uses a common unique reference so that there is a clear trail between each of the documents and the online information. It would be preferable for the information and processes to utilise Council IT systems (e.g. use of SAP, scanning documents etc.) rather than being paper based	Agreed	<p><b>Implementation Date:</b> May 2013</p> <p><b>Follow Up</b> February 2013</p> <p><b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>A new policy has been consulted on and agreed in November 2013. The request/ terms of agreement form has been revised in light of this document and in line with the new Policy and now includes the phone number, phone make &amp; model and asset number. All forms have been updated. Link between data currently captured in "Mobile Inventory" excel spreadsheet and other documentation is to be the mobile phone number. Thus documentation as received will be scanned or e-e-mails saved with the phone number used as the reference and the inventory data being used to provide the linkage between records. Hard copies of the request/Terms of Agreement form will be retained.</p> <p><b>Second follow up response</b> New agreements are scanned and kept on the network under the mobile phone number.</p>	<p>Part/in progress</p> <p><b>Re rated as Implemented</b></p>

**APPENDIX D**

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Mobile Phones	<p>The Terms and Conditions (currently Terms of Agreement) document that users sign should be strengthened to reflect:-</p> <ul style="list-style-type: none"> <li>• any changes to the Mobile Phone policy,</li> <li>• specific confirmation that the individual has received, read and understood the Policy (as well as its procedures and any guidance document) as well as other relevant Policies (e.g. Information Management and security where data is being handled)</li> <li>• the employee’s responsibility to notify the manager of the mobile phones system prior to leaving the employment of the Council and to return the equipment to them.</li> </ul> <p>These should be signed prior to any equipment being issued. Given the current accessibility of records revised Terms and Conditions should be signed by all existing and new users once the policy has been formally updated, issued and agreed</p>	<p>Agreed – this will be addressed in the new Policy.</p>	<p><b>Implementation Date:</b> May 2013</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>A new policy has been consulted on and agreed in November 2013. Request/ Terms of Agreement form has been revised in the light of the policy with reference to the Information Management and Security Policy, the Terms of Agreement section includes confirmation that:-</p> <ul style="list-style-type: none"> <li>• the individual has received, read, and understood the Policy and Terms of Use and</li> <li>• to return equipment no longer required or when leaving the Council’s employment. A “change of user” form, has been developed so that if the budget holder wants phone to be used by a different/ new staff user, they complete a form to inform procurement of this change. The Policy, Terms of Use and order request will be issued for all new users and signed for before the equipment is issued. For existing users Procurement will issue the Policy and Terms of Use to budgetholders (with a list of the authorised device users for that budget) so that the existing users can sign and return Terms of Agreement form. Procurement will follow up any forms that have not been returned/ signed with the budgetholders.</li> </ul>	<p>Part/in progress</p>

**APPENDIX D**

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				<p><b>Second follow up response</b>                      New policy in place, new user forms in place and an inventory is held of devices. However, insufficient resources to get existing users to sign and return the new terms of agreement form as outlined previously.</p>	<p><b>Re rated as</b>                      Substantially implemented</p>
<p>Mobile Phones</p>	<p>Where an employee leaves the council but the device is required by their successor (or another member of the team) a similar but shorter process could be used. However the device should still be returned to the manager of the mobile phones system so that the new user is clearly identified on records and the responsibilities can be shown to have transferred through a fresh signed copy of the terms and conditions</p>	<p>Agreed</p>	<p><b>Implementation Date:</b> May 2013   <b>Follow Up</b>                      February 2013  <b>2<sup>nd</sup> Follow up</b>                      June 2014</p>	<p>A new policy has been consulted on and agreed in November 2013. A new “change of user” form has been designed to enable the transfer of a phone to a new user, that is authorised by the budget holder, and for the change to be tracked and recorded. To be administered by the contract manager/s. The process of obtaining fresh signed copies of the Terms of Agreement form for existing and new users, under the new Policy, is planned. As part of this changes for devices to new users will be obtained.</p>	<p>Part/in progress</p>

**APPENDIX D**

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
				<p><b>Second follow up response</b> All in place except existing users have not been asked to sign fresh copies of the Terms of Agreement as outlined above.</p>	<p><b>Re rated as</b> Part implemented</p>
Capital Expenditure Programme	It should be ensured that the timings of the Asset Management Plan and the Capital Strategy/Capital Programme should be aligned so that information taken from the AMP is the final version and is therefore accurate and up to date	<b>Finance:</b> Agreed. Ensure that the Capital Strategy is based on the final version of the AMP.	<p><b>Implementation Date:</b> Implemented. Already in place for 13/14 Strategy</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>Implementing a 4 year capital programme 2014/15 to 2017/18 – check AMP (Dave Masters) has been updated to align with a 4 year programme</p> <p><b>Second follow up response</b> Bids submitted must take into account the current AMP.</p>	<p>Planned</p> <p><b>Re rated as</b> Implemented</p>
Capital Expenditure Programme	In compliance with Financial Regulations and Contract Procedure Rules, it should be ensured that a SAP order is raised before work commences on site so that the commitment is raised on the system to avoid budget overspends. It should further be ensured that all gateway documentation is also appropriately authorised before work commences on site to ensure that the correct authorisations are obtained to avoid the potential risk of unauthorised	<b>Property:</b> Agreed. A management instruction will be issued to this effect. The reported instances were a result of the change over from SAP orders being raised by Property Services to now being raised by Children's & Families. Contract Procedure Rules will be followed. Recognising that there may be exceptional circumstances where work	<p><b>Implementation Date:</b> November 2012/ongoing/ December 2012</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>Still issues around budgets not being available in SAP in a timely fashion to allow orders to be raised. Issues around instructions to commence on site being made without following financial regs and current guidelines.</p>	<p>Part/in progress</p>

**APPENDIX D**

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
	works/services	needs to start before orders are placed and documentation fully completed the need for a fast track waive will be explored and recommendations made. This will include agreement on the protocol to be followed in the event that an instance of non-compliance is discovered by a client representative or manager.		<b>Second follow up response</b> This recommendation was aimed at Property Services. Following a re-structure, the Property Services division no longer exists.	<b>Re rated as</b> Not implemented (will be picked up in 14/15 review of schools capital programme)
Capital Expenditure Programme	Every effort should be made to locate the missing file for the capital transaction testing 2011/12 as it is part of the documentation to evidence that Harrow's controls have been correctly applied and will confirm that prompt action was taken to correct any miscodings. A protocol should also be put in place as soon as possible to determine the processes to be carried out for 2012/13 and whose responsibility it is to undertake this, i.e. individual finance teams or the Interim Capital Projects Manager. If it is determined that this will be the responsibility of the Interim Capital	<b>Finance:</b> Capital Projects Manager has co-ordinated the sample selection for 12-13 up to the end of November 2012 and these have been sent to the Finance Teams to compile the evidence. Going forward, testing to be carried out on a monthly basis from December 2012. Interim Capital Projects Manager to co-ordinate sample selection and Finance Teams to compile the evidence etc.	<b>Implementation Date:</b> By end of January 2013  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014	2011/12 – file(s) not found 2012/13 – process, transactions selection, copies of invoices & test undertaken and saved electronically 2013/14 – process & selection criteria to be reviewed	Part/in progress

**APPENDIX D**

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
	<p>Projects Manager, it is further recommended that once the testing has been undertaken, it is sent to the finance teams for them to check the evidence and that this relates to capital as they have more detailed knowledge of their areas. All transaction testing should record all relevant information including a record of the checking date, the conclusion, any queries raised, action taken and whether it had been coded correctly. It should also be confirmed how often the capital transaction testing should be undertaken. This should be for the first two quarters of 2012/13 and then monthly thereafter</p>			<p><b>Second follow up response</b> Missing file now found. Transaction testing carried out for Q2 and Q3 of 2013/14 and a process for 2014/15 has been devised by the Senior Financial Adviser – Projects but has yet to be approved.</p>	<p><b>Re rated as</b> Substantially implemented</p>
<p>St John Fisher Governance &amp; Financial Controls</p>	<p>In accordance with Financial Regulations and Contract Procedure Rules all orders should be placed in advance of expenditure and before the receipt of goods other than agreed exceptions. This will avoid the risk of overspends and will ensure that the school are complying with laid down procedures and will avoid the lack of commitment on FMS6 resulting in inaccurate budgetary control information</p>	<p>All staff reminded of correct procedures for ordering – particularly HT and Site Supervisor. Finance newsletter sent to all staff</p>	<p><b>Implementation Date:</b> Immediate  <b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>This is done in the main. There are some occasions where this has not happened. Discussed at Resources 20/1/14. Governors agreed that 100% is not possible – eg Royal Bank of Scotland POs. However, FO to make a list of all POs that need to be done on a termly basis, annual basis etc so that the number of instances reduces.</p> <p><b>Second follow up response</b> List of POs to be done on a termly basis drawn up.</p>	<p>Part/in progress</p> <p><b>Re rated as</b> Implemented</p>



**APPENDIX D**

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
Personalisation	The JAT team should investigate avenues available to them that would enable copies of documentation from the service user to be taken and stored on Framework-I. This will ensure that there is evidence to support the financial assessment and in the event of an appeal the Council can support their assessment. This will minimise the risk of incomplete or inaccurate information being taken into account as part of the financial assessment which could potentially lead to a service user either under or over contributing to their care. It will also create a robust audit trail of information used to undertake the assessment.	The team have been waiting the outcome of the corporate trial of iPads to enable copies of evidence to be taken. The implementation of iPads will be rolled out as soon as the pilot has been signed off and equipment can be ordered.	<p><b>Implementation Date:</b> Dependant on completion of ipad trial</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>The ipad trail has not happened yet, however we are still trying to implement this, reliant on decisions by management</p> <hr/> <p><b>Second follow up response</b> Progress has been made towards this, the team have the ipads but there are currently issues around IT and data security that need to be resolved before the ipads can be put into use</p>	<p>Planned</p> <hr/> <p><b>Re rated as</b> Part implemented/in progress</p>
Personalisation	A protocol should be developed which details the monitoring procedure, i.e. evidence which should be provided, how this information will be checked etc. Once the protocol has been developed the monitoring officers should be formally trained to ensure they understand the procedure and their responsibilities. This will ensure that staff are aware of there responsibilities and there is a set	On the back of the decommissioning of the Homecare block arrangements, staff formally managing these areas combined with current monitoring officers have been combined to oversee the appropriate monitoring of Cash PB's and ISF's The staff have been	<p><b>Implementation Date:</b> January 2014</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	This is currently in final draft and is awaiting approval	Part/in progress

**APPENDIX D**

Review	Recommendation	Agreed Action	Relevant Dates	Follow up Response	Details
	process in place for monitoring service users	<p>trained in various aspects to provide support, safeguarding etc to make an effective engagement with SU's. The protocol is in only developed in draft until the role is formally agreed.</p> <p>A new approach as agreed with Fraud about an audit approach to monitoring rather than returns submission.</p>		<p><b>Second follow up response</b> This is still in progress as it cannot be finalised until the restructure has taken place, this is due to take place within the next 2 months</p>	<p><b>Re rated as</b> Part implemented/in progress</p>
Personalisation	<p>Staff should be given formal guidance on when suspected cases of misuse should be referred to CAFT. Personalisation should work with the CAFT Team to create an aid to identify any trigger factors that would prompt a referral and agree a referral process pack to contain user information such as support plan, signed contract, monitoring forms and any supporting evidence of the financial assessment etc. This information should also be recorded on Framework-I to ensure there is a management trail. This will minimise the risk of cases not being referred to CAFT for investigation</p>	<p>This will be included within the procedures that are being developed as part of the monitoring process. Where a referral is made to CAFT then copies of relevant documentation will be provided as part of the referral where this is available.</p>	<p><b>Implementation Date:</b> March 2014 Implemented</p> <p><b>Follow Up</b> February 2013 <b>2<sup>nd</sup> Follow up</b> June 2014</p>	<p>There is a reinforced process from CAFT, this is included in the final draft of the procedures</p> <p><b>Second follow up response</b> This is still in progress as it cannot be finalised until the restructure has taken place, this is due to take place within the next 2 months</p>	<p>Part/in progress</p> <p><b>Re rated as</b> Part implemented/in progress</p>

