

A hand holding a black pen points towards a tablet screen. The screen displays a colorful line graph with blue, green, and red lines. The background is dark with blue and red light streaks. A red vertical bar is on the left side of the image.

INTERNAL AUDIT FOLLOW UP OF RECOMMENDATIONS REPORT

BRENTWOOD BOROUGH COUNCIL

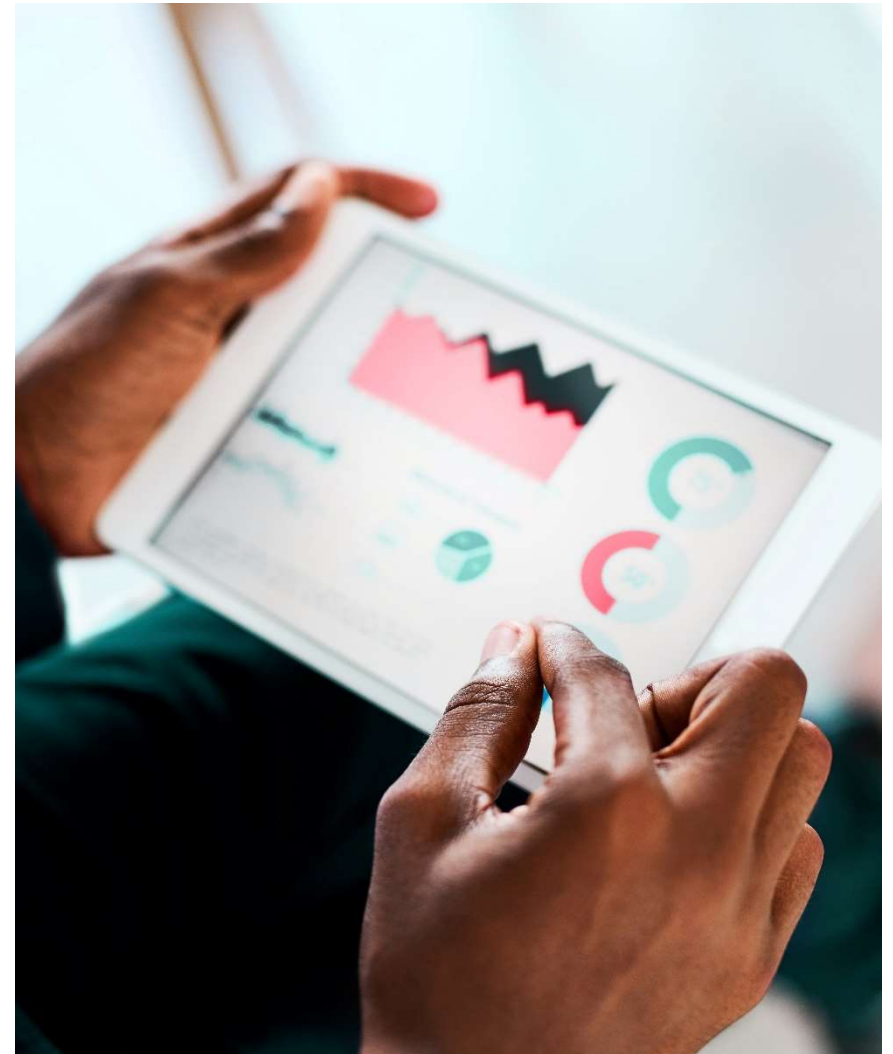
September 2022

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SUMMARY

2021/22	Total Recs	H	M	L	To follow up	Complete		In progress		Overdue		Not Due	
						H	M	H	M	H	M	H	M
Risk management	3	-	3	-	3	-	-	-	-	-	-	-	3
Main financial systems	5	-	2	3	2	-	1	-	1	-	-	-	-
Financial planning and monitoring	0	-	-	-	0	-	-	-	-	-	-	-	-
C-19 Grants expenditure	2	-	2	-	2	-	2	-	-	-	-	-	-
Capital projects	1	-	1	-	1	-	-	-	-	-	-	-	1
Partnerships	2	-	2	-	2	-	-	-	2	-	-	-	-
Local development plan	2	-	-	2	0	-	-	-	-	-	-	-	-
IT data breaches	4	-	4	-	4	-	2	-	2	-	-	-	-
Building control	2	-	2	-	2	-	1	-	1	-	-	-	-
Planning	3	-	3	-	3	-	1	-	2	-	-	-	-
Homelessness	4	-	3	1	3	-	2	-	1	-	-	-	-
Section 106 agreements	2	2	-	-	2	-	-	-	-	-	-	2	-
Total	30	2	22	6	24	-	9	-	9	-	-	2	4

2020/21	Total Recs	H	M	L	To follow up	Complete		In progress		Overdue		Not Due	
						H	M	H	M	H	M	H	M
Risk management	3	-	2	1	2	-	2	-	-	-	-	-	-
Main financial systems	6	-	5	1	5	-	5	-	-	-	-	-	-
Financial planning and monitoring	1	-	-	1	0	-	-	-	-	-	-	-	-
Procurement and contract management	6	-	4	2	4	-	3	-	1	-	-	-	-
Performance management and formal complaints	3	-	1	2	1	-	1	-	-	-	-	-	-
Disaster recovery and business continuity	1	-	1	-	1	-	-	-	1	-	-	-	-
Cyber security	4	-	3	1	3	-	2	-	-	-	1	-	-
Sickness absence	5	1	4	-	5	1	4	-	-	-	-	-	-
Fraud risk assessment	35	1	12	22	13	1	12	-	-	-	-	-	-
Environment - Street cleaning, fly tipping and enforcement	6	2	4	-	6	-	-	-	-	-	-	2*	4*
Covid-19 related grants	0	-	-	-	0	-	-	-	-	-	-	-	-
Licensing	7	2	4	1	6	-	-	-	-	-	-	2*	4*
Corporate strategy	4	-	3	1	3	-	3	-	-	-	-	-	-
Total	81	5	44	32	49	2	32	-	2	-	1	4	8

* These recommendations are due but are marked here as not yet due as they are being followed up separately in a new audit of the service in 2022/23

SEPTEMBER 2022

	Total Recs	H	M	L	To follow up	Complete		In progress		Overdue		Not Due	
						H	M	H	M	H	M	H	M
Risk management	7	-	3	4	3	-	3	-	-	-	-	-	-
Main financial systems	10	-	3	7	3	-	3	-	-	-	-	-	-
Financial planning and monitoring	1	-	-	1	0	-	-	-	-	-	-	-	-
Treasury management	3	-	2	1	2	-	2	-	-	-	-	-	-
Housing repairs and maintenance	3	-	1	2	1	-	1	-	-	-	-	-	-
General data protection regulations	0	-	-	-	0	-	-	-	-	-	-	-	-
Leisure services	3	-	2	1	2	-	2	-	-	-	-	-	-
Housing benefits	4	-	3	1	3	-	3	-	-	-	-	-	-
Food safety	2	-	1	1	1	-	1	-	-	-	-	-	-
Trade waste	2	-	1	1	1	-	-	-	-	-	1	-	-
HR recruitment	3	-	1	2	1	-	1	-	-	-	-	-	-
Total	38	-	17	21	17	-	16	-	-	-	1	-	-

SEPTEMBER 2022

	Total Recs	H	M	L	To follow up	Complete		In progress		Overdue		Not Due	
						H	M	H	M	H	M	H	M
Workforce Strategy	2	-	2	-	2	-	2	-	-	-	-	-	-
Housing Department	2	1	1	-	2	1	1	-	-	-	-	-	-
Main Financial Systems	13	-	6	7	6	-	6	-	-	-	-	-	-
Housing - Homelessness	3	1	1	1	2	1	1	-	-	-	-	-	-
GDPR Compliance	1	-	1	-	1	-	1	-	-	-	-	-	-
Disaster Recovery and Business Continuity	5	-	3	2	3	-	3	-	-	-	-	-	-
Local Development Plan	3	-	2	1	2	-	2	-	-	-	-	-	-
Corporate Projects	5	-	3	2	3	-	3	-	-	-	-	-	-
Building control	2	-	-	2	-	-	-	-	-	-	-	-	-
Planning	1	-	-	1	-	-	-	-	-	-	-	-	-
PCI/DSS Compliance	5	1	4	-	5	1	3	-	-	-	1	-	-
Total	42	3	23	16	26	3	22	-	-	-	1	-	-

SEPTEMBER 2022

All audits	97	14	66	17	80	14	66	-	-	-	-	-	-
Total	97	14	66	17	80	14	66	-	-	-	-	-	-

CUMULATIVE 2017/18 TO 2021/22

Total	288	24	172	92	196	19	145	-	11	-	3	6	12
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SUMMARY

Of the total 196 recommendations followed up from audits in 2017/18 to 2021/22, 178 were due to be implemented by 31 August 2022. We have confirmed with reference to evidence that 164 have been completed/closed. Six high priority recommendations are outstanding, which are either not yet due or not included in the follow up as they are being re-audited in 2022/23.

2021/22

- Of the 24 recommendations raised in 2021/22, 9 have been completed, 9 are in progress and 6 are not yet due.

2020/21

- Of the 49 recommendations raised in 2020/21, 34 have been completed, 2 are in progress, 1 is overdue and 12 are not yet due. The not yet due recommendations include 6 Licensing recommendations (2 of which are high priority) and 6 Steet cleaning, fly-tipping and enforcement recommendations (2 of which are high priority) which will be followed up by new audits of the services (including sample testing) as part of the 2022/23 internal audit plan.

2019/20

- Of the 17 recommendations raised in 2019/20, 16 have been completed and 1 is overdue.

2018/19

- Of the 26 recommendations raised in 2018/19, 25 have been completed and 1 is overdue.

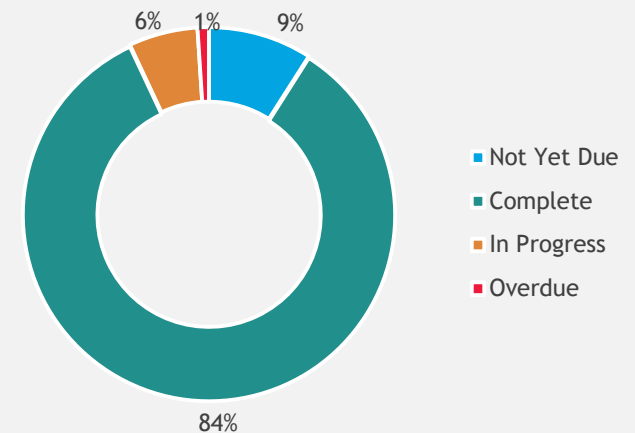
2017/18

- Of the 80 recommendations raised in 2016/17 and 2017/18, all have been closed.

REQUIRED AUDIT & SCRUTINY COMMITTEE ACTION:

We ask the Audit Committee to note the progress against the recommendations.

September 2022 Cumulative implementation



RECOMMENDATIONS: COMPLETE SINCE LAST FOLLOW UP REPORT

AUDIT	ACTIONS AGREED	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
2020/21 - Corporate Strategy	20/21 CS rec 3: a) Management should ensure that the service plans for Corporate Finance, Risk & Insurance and Communications are completed and made available to staff.	Medium	Jacqui Van Mellaerts (Director of Corporate Resources)& Steve Summers (Chief Operating officer)	December 2020 August 2024 February 2022 September 2022 Closed	<u>Management update:</u> The two service plans have now been drafted and were agreed at the IG Group meeting in August 2022.
	b) The focus areas and annual targets in service plans should clearly identify and reference to each of the strategic objectives for the year, as relevant to each service.		Tim Huggins (ICT Manager)	January 2024 August 2024 October 2024 Closed	The task of matching projects and service plans was undertaken. A new Business plan has been developed and a projects and programmes board formally set up. <u>Internal audit comment:</u> Part (b) previously closed. Part (a) now closed following receipt of evidence that the two service plans have now been agreed.
2021/22 - Main Financial Systems	21/22 MFS rec 4: A summarised version of the Treasury function's detailed cash flow forecast, which displays the projected position and key assumptions, should be presented to the Senior Leadership Team (SLT) and the Policy, Resources and Economic Development (PRED) Committee on a quarterly basis, to enable sufficient oversight of the Council's liquidity position.	Medium	Phoebe Barnes (Corporate Manager - Finance)	September 2022 Closed	<u>Management update:</u> The cashflow forecast was included in the budget update papers for quarter 1, circulated to SLT. The report being prepared for PRED in September 0222 will also include cash flow forecast information. <u>Internal audit comment:</u> Recommendation closed following receipt of the budget update papers.

AUDIT	ACTIONS AGREED	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
2021/22 - Building Control	<p>21/22 BC rec 1:</p> <p>Training should be provided to all staff who use the system to ensure they fully understand their responsibilities when it comes to completing certain sections of the system as part of the Full Plan review process.</p> <p>Management should carry out regular sample spot checks of the system, and where staff members are found to not be completing the required sections of the system, further training and feedback should be provided.</p>	Medium	Rob Farman (Senior Building Surveyor and Quality Management Officer)	<p>June 2022</p> <p>Closed</p>	<p><u>Management update:</u></p> <p>Staff are being regularly reminded to complete all fields on the system. The training element however is not a major factor as such, as the interface task with computer system has very low complexity, being a case of reminding people to ‘tick the boxes’.</p> <p>An audit of Full Plans applications submitted between March and the end of May 2022, involving 33 applications, was undertaken in June. This revealed minor issues were still occasionally arising, however the main criteria of being able to identify the member of staff undertaking the work and the confirmation of the review of the project against the Building Regulations criteria could be established in all cases.</p> <p>Identified issues have been addressed with the surveyors.</p> <p><u>Internal audit comment:</u></p> <p>Recommendation closed following receipt of confirmation of the above from the service.</p>
2021/22 - Planning	<p>21/22 PLN rec 3</p> <p>The Council should ensure that the Delegated Decision Report template includes prompts for further detail and clarity with regards to the consultation process, including when site notices and letters were issued, the number of letters issued and subsequent responses.</p>	Medium	Anthony Fletcher (Development Management Admin Manager)	<p>March 2022</p> <p>September 2022</p> <p>Closed</p>	<p><u>Management response:</u></p> <p>There were some coding issues which we needed to work with our software provider to overcome. The new template has been created and officers have been asked to test it.</p> <p><u>Internal audit comment:</u></p> <p>Recommendation closed following receipt of confirmation that the new template is in place.</p>

RECOMMENDATIONS: IN PROGRESS

These recommendations have been marked as In Progress as they have not been implemented by their original date; a revised date has been provided.

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
2020/21 - Disaster Recovery and Business Continuity	<p>20/21 DRBC rec 1:</p> <p>Management should perform a training needs analysis to identify and assess the level and type of training required by all members of staff with regards to business continuity and disaster recovery and should develop a mandatory training programme that is based upon these requirements. Training delivery methods could include, but not be limited to, the exercise types suggested in Appendix I in our report. Attendance should be recorded and monitored and training records should be maintained for audit purposes.</p> <p>Furthermore, Management should conduct a formally documented test of its business continuity and disaster recovery arrangements and should put arrangements in place to test them on a routine basis or following a significant change to the Council's operations. The results of the tests should be reported to Senior Management and any issues identified should be resolved in a timely manner.</p>	Medium	Sue White, (Risk and Insurance Officer)	<p>October 2021</p> <p>June 2022</p> <p>September 2022</p>	<p><u>Management update:</u></p> <p>The training was provided in May 2022.</p> <p>Officers are considering a One Team approach to emergency planning and business continuity with Rochford District Council. Due to these changes, there has been no testing of BC Plans to date.</p> <p>We are registered with Gov.uk Notify and IT have successfully used this method of communication on a number of occasions to inform staff when there is an IT issue.</p> <p><u>Internal audit comment:</u></p> <p>First part of the recommendation closed by Internal audit following receipt of evidence of the training provided. However, second part of recommendation regarding a test of business continuity arrangements remains open.</p>
2020/21 - Procurement and Contract Management	<p>20/21 P&CM rec 3:</p> <p>Evidence to support contract extensions should be organised and stored appropriately so that they are easily retrievable for future use. A senior member of the procurement team should review the documentation for adequacy and completeness.</p>	Medium	Jane Mitchell (Senior Procurement Officer)	<p>January 2022</p> <p>September 2022</p>	<p><u>Management update:</u></p> <p>When reviewing the Contracts Register and asked to extend a contract, the Procurement Officer to ask for evidence for the extension.</p> <p>This action is ongoing.</p> <p><u>Internal Audit comment:</u></p> <p>Recommendation remains open.</p>

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
2021/22 - Homelessness	<p>21/22 HLN rec 4:</p> <p>The Council should review the KPIs that it reports to SLT as well as the Environment, Enforcement and Housing Committee in respect of homelessness, rough sleeping and temporary accommodation.</p> <p>Consideration should be given to inclusion of the following KPIs:</p> <ul style="list-style-type: none"> • The number of homelessness cases received as a cumulative total in the year and for the month • The number of homelessness cases by case type i.e. prevention, relief, triage and decision • The number of open and closed homelessness cases • % of cases where the 56 day rule has been met • Number of rough sleepers in the borough • Number of referrals made via StreetLink. 	Medium	Angela Abbott (Corporate Manager - Housing Needs and Delivery)	<p>January 2022</p> <p>June 2022</p> <p>September 2022</p>	<p><u>Previous management update:</u></p> <p>A suite of proposed KPIs and Service Standards has been prepared, which includes the recommended KPIs referred to in this report.</p> <p><u>Internal audit comment:</u></p> <p>Recommendation kept open until the KPIs are reported to SLT and Members.</p> <p>No update received from management since the last update.</p>
2021/22 - Planning	<p>21/22 PLN rec 1</p> <p>The Council should ensure that it has clear staff guidance for reviewing and assessing planning applications and that it carries out periodic reviews of the guidance (e.g. annually) to ensure that it remains up to date and reflects the latest requirements. An updated Handbook should continue to cover at a minimum:</p> <ul style="list-style-type: none"> • The role of Councillors and Officers • Planning advice • Declaration of interests in planning 	Medium	Caroline Corrigan (Corporate Manager Planning Development Management)	<p>May 2022</p> <p>September 2022</p>	<p><u>Previous management response:</u></p> <p>A handbook would support and guide officers on the procedures that are statutory along with an outline of roles and responsibilities. This would guide new members of staff and serve as a point of reference for when processes change or are updated. Overall this would provide a best practice manual. A number of the items listed above include roles and responsibilities or decisions that are not within the gift of Planning Officers, such as Lobbying or Public Speaking at Committees. For example, as a handbook, guidance on making a decision contrary to officer recommendation or the development plan is a matter for the Committee. Formal complaints are dealt with by a separate Corporate team. This will be noted in the handbook.</p>

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
	<p>applications</p> <ul style="list-style-type: none"> • Officer reports to Committee • Committee site visits • Lobbying • Public speaking at Committees • Decisions contrary to Officer recommendation/Development Plan • Regular review of planning decisions <p>Complaints.</p>				<p><u>Internal audit comment:</u></p> <p>No update received from management since the last update.</p>
	<p>21/22 PLN rec 2</p> <p>The Planning team should put in place a Declaration of Interests register to log any conflicts of interest where a Planning Officer has been assigned a planning application from an applicant they have a connection with.</p>	Medium	Caroline Corrigan (Corporate Manager Planning Development Management)	<p>May 2022</p> <p>September 2022</p>	<p><u>Previous management response:</u></p> <p>In principle this is agreed. This will be included in the handbook, and officers will be provided with guidelines on when they should declare an interest.</p> <p><u>Internal audit comment:</u></p> <p>No update received from management since the last update.</p>
2021/22 - IT Data Breaches	<p>21/22 ITDB rec 1:</p> <p>a) Management should review and update the Council's Data Protection policy and Data Breach policy to ensure that it remains in compliance with the UK GDPR requirements and they are relevant to the Council's needs and in line with the Council's strategic objectives.</p> <p>b) The Data Breach policy should include detailed procedures for reporting a data breach. This should include but not be limited to:</p> <ul style="list-style-type: none"> ○ Defining roles and responsibilities ○ Description of type of personal data breach ○ Steps taken in case of a breach ○ Risk assessments and escalations 	Medium	Tim Huggins (ICT Manager)	<p>January 2022</p> <p>June 2022</p> <p>September 2022</p>	<p><u>Previous management update:</u></p> <p>Brentwood Council has gone into partnership with Evalian to support the Council's statutory requirements for Data Protection. As part of this a full gap analysis will be conducted for Data Protection including but not limited to Policies, Processes for Data Protection and Data Breaches. Following this a formal remediation action plan will be developed and actions implemented. This work will support the newly formed Information Governance (IG) Group in their role around information Governance, and the contract will be monitored by the Corporate Manager - IT & Service Improvement.</p> <p>The current Data Breach Policy is available. There is outstanding work to review and update. Due to a large number of subject access requests (SARs), the resources that were arranged for this work have been needed to carry out statutory obligations around the SARs. The Council is looking at how this work can be funded.</p>

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
	<ul style="list-style-type: none"> o Containment and recovery o Contact details of the DPO, or other point of contact o Measures taken to evaluate and mitigate any possible breaches o Breach notifications to the ICO o Training and awareness o Monitoring and reporting compliance <p>The revised policies should be approved and communicated to members of staff and arrangements should be put in place for reviewing the policies on an annual basis.</p>				<p>a) Reviewing of Information Governance policies is part of the role for the IG group and therefore this action will be co-ordinated by the group working with appropriate officers and partners.</p> <p>b) In addition to above - the group will review the recommendations as part of its action plan. Once the suggestions have been reviewed the agreed ones will be included.</p> <p>c) Agreed this is normal practice and will be published in document library and formal communication will be shared with all staff, and also including other IG activities such as training and awareness. Regular reviewing of IG policies is part of the roles and responsibilities of the newly formed IG group and will be undertaken.</p> <p><u>Internal audit comment:</u> Recommendation remains open. No response received from management since the last update.</p>
	<p>21/22 ITDB rec 4:</p> <p>a) The Council should develop an IG training programme, which includes basic IG training for everyone, including new starters, annual refresher training and additional training for key staff groups or roles. Furthermore, training completion should be monitored and there should be a record of all the training that has been provided and completed.</p> <p>b) A comprehensive training needs analysis should be completed and approved by IGG. The training needs analysis should then be annually reviewed and updated against the continuously evolving industry</p>	Medium	Tim Huggins (ICT Manager)	<p>December 2021</p> <p>June 2022</p> <p>September 2022</p> <p>December 2021</p> <p>June 2022</p> <p>September 2022</p>	<p><u>Previous management update:</u></p> <p>The Council already has embedded processes for new starters to carry out information governance training before they start. The elearning platform course was developed with another local authority and requires the passing of a short test. If this is not passed access to systems are stopped.</p> <p>The training portal with Evalian has now been commissioned and the Service Improvement is carrying out the first run on the training and quizzes. Once complete on 1 July 2022, if there are no issues, it will be rolled out across the organisation and moved to Business as Usual. The learning portal is Evalian Online Learning.</p> <p>Brentwood has gone into partnership with Evalian to support the statutory requirements for Data Protection. Part of this is regular training. Evalian provides a training portal to allow Brentwood to train, monitor and analyse. and the IG Group will work with Evalian to continue to update the training in line with industry regulations.</p>

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
	regulations and best practices to ascertain if staff have been appropriately trained.				<p><u>Internal audit comment:</u></p> <p>Recommendation remains open.</p> <p>No response received from management since the last update.</p>
2021/22 - Partnerships	<p>21/22 PART rec 1:</p> <p>a) The Council should ensure that the Partnership Checklist is completed in all cases and held centrally. Consideration should be given to retrospectively completing the checklist for the Community Safety Partnership.</p> <p>b) The Partnerships Register should clearly indicate the risk level for all partnerships listed and the gaps in the register should be completed retrospectively.</p> <p>c) The Council's Partnership Register should include a hyperlink to the completed Partnership Checklist.</p>	Medium	Kim Anderson (Corporate Manager Communities, Leisure and Health)	<p>July 2022</p> <p>September 2022</p> <p>July 2022</p> <p>September 2022</p> <p>July 2022</p> <p>September 2022</p>	<p><u>Management update:</u></p> <p>A TEAMS site has been created which the Corporate Leadership Team and the Extended Leadership Team can access. The Corporate Manager that is the lead for the Community Safety Partnership has been asked to retrospectively complete the checklist and submit it so that the register is up to date.</p> <p>The Partnership Register is currently being updated to provide the risk level for each of the partnerships.</p> <p>The Partnership Register is currently being updated to include a hyperlink to the completed Partnership Checklist.</p> <p><u>Internal audit comment:</u></p> <p>Recommendation remains open.</p>
	<p>21/22 PART rec 2:</p> <p>The Senior Leadership Team should ensure that an Annual Performance Assessment is completed by the partnership leads for all partnerships. Reminders should be put in place before the annual deadline to ensure this is completed in a timely manner.</p>	Medium	Kim Anderson (Corporate Manager Communities, Leisure and Health)	<p>July 2022</p> <p>March 2023</p>	<p><u>Management update:</u></p> <p>At the Council's next Extended Leadership Team meeting all Corporate Managers that are the leads for the partnerships on the register will have to complete an annual performance review.</p> <p><u>Internal audit comment:</u></p> <p>Recommendation remains open.</p>
2021/22 - Main Financial Systems	<p>21/22 MFS rec 1:</p> <p>When requesting approval of loans, the e-mail request should explicitly set out all the key</p>	Medium	Alistair Greer (Principal Accountant -	September 2022	<p><u>Management update:</u></p> <p>We have an update meeting arranged with our treasury management advisers for early October, and that meeting will set</p>

AUDIT	RECOMMENDATIONS MADE	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
	facts about each loan that demonstrates that it meets the requirements of the Treasury Management Strategy in terms of risks and affordability.		Financial reporting)		the stage for setting out our intended borrowing activity for the quarter October to December 2022. <u>Internal audit comment:</u> Recommendation remains open.
2021/22 - Building Control	<p>21/22 BC rec 2:</p> <p>The service should request the Council's ICT department and third-party provider to enable functionality that allow management to download reports from the system which closely monitor progress against ISO and statutory KPIs. There should be reports that show:</p> <ul style="list-style-type: none"> - Application date and date approved or rejected versus the ISO and statutory completion date requirements - All current active applications being worked on - All rejected applications within a specified timeframe - All approved applications within a specified timeframe. <p>The Council should also liaise with the system service provider to ensure that the completion deadline dates are precisely calculated on the system.</p>	Medium	Gary Price-Sampson (Building Control Team Leader)	June 2022 October 2022	<p><u>Management update:</u></p> <p>A system to advise on decision dates still needs to be developed, however this is not currently a KPI within the LABC ISO system we operate. It will be a most useful tool and will continue to be pursued / developed. This is a 'loop hole' likely to be closed out by the LABC ISO system at some date as the statutory decision dates are the indicator of ultimate failure, rather than the LABC 'self set' KPIs. Information on these ultimate failures is currently collected manually by us.</p> <p><u>Internal audit comment:</u> Recommendation remains open.</p>

RECOMMENDATIONS: OVERDUE

These recommendations have been marked as overdue as they have previously revised their implementation date. Therefore, they have now missed at least two implementation dates.

AUDIT	ACTIONS AGREED	PRIORITY LEVEL	MANAGER RESPONSIBLE	DUE DATE	CURRENT PROGRESS
2018/19 - PCI/DSS Compliance	<p>18/19 PCI/DSS rec 5:</p> <p>A policy should be developed, which sets out how the Council will manage PCI DSS compliance activities and the policy should be reviewed on a regular basis. The policy should include but not be limited to:</p> <ul style="list-style-type: none"> • Assignment of roles and responsibilities for ensuring that the Council is PCI DSS complaint have been assigned • Procedures for staff that are responsible for taking card payments • The Council's security strategy in relation to the storage, processing and transmission of credit card data <p>A set of instructions for detecting, responding to and limiting the effects of an information security event. The Council should develop and disseminate suitable procedure notes for staff, to ensure that working practices are compliant. Appropriate training should be provided on PCI DSS requirements to all members of staff dealing with card payments.</p>	Medium	Tim Huggins (ICT Manager)	<p>September 2019</p> <p>June 2020</p> <p>September 2020</p> <p>October 2020</p> <p>December 2020</p> <p>March 2021</p> <p>August 2021</p> <p>October 2021</p> <p>June 2022</p> <p>September 2022</p>	<p><u>Previous management update:</u></p> <p>The policy has been developed.</p> <p>Storage of data in within the information security policies and management of data is part of the GDPR training.</p> <p>The Council is trying to find correct training material for this training.</p> <p><u>Internal audit comment:</u></p> <p>Internal Audit was previously satisfied from review of the policy dated November 2019 that these elements have been included. However, recommendation kept open until training has been provided.</p> <p>No update received from management since the last update.</p>
2019/20 - Trade Waste	<p>19/20 TW rec 1:</p> <p>a) Actively search and identify possible opportunities/events available to promote the trade waste service, ensuring that the market audience is understood prior to</p>	Medium	Mike Dun (Trade Waste Officer)	<p>March 2020</p> <p>March 2021</p> <p>September 2022</p>	<p><u>Previous management update:</u></p> <p>Although these would have been something we would have liked to undertake, since the pandemic we have had to focus on keeping our existing customers' needs met. We have had to adjust contracts continually as businesses have closed and opened on various occasions. This has consumed a large amount of admin time. We will be looking to promote additional</p>

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	attending events to ensure they are aligned with the service's target market.				contracts but this is on hold until we manage to get our current data base correct for the April 2022 renewal.
	b) Liaise with the business rates team to ensure that trade waste leaflets with fee information are distributed as part of the annual business rates information packs.			October 2019 February 2020 Closed	b) A leaflet was drawn up that promotes the services of the Business Waste Team and was delivered in March along with the NDR demand to all businesses in Brentwood. c) Staff issues and the adverse impact of Corona Virus making this activity difficult at the moment. All efforts going on existing client base to protect it.
	c) Liaise with the food safety team to identify new businesses that may require trade waste services.			October 2019 February 2020 Closed	Staff issues and the adverse impact of Corona Virus making this activity difficult at the moment. All efforts going on existing client base to protect it.
	d) Undertake cold-calling of local businesses in the borough to attract new customers.			Ongoing March 2021 March 2022 September 2022	As per part a above. <u>Internal audit comment:</u> Part b was previously closed following receipt of the leaflet. Part c was previously closed following confirmation received from the service. Parts (a) and (d) remain open. No update received from management since the last update.
2020/21- Cyber Security	20/21 CSec rec 1: a) The Council should establish a cyber security awareness programme for all	Medium	Tim Huggins (ICT Manager)	July 2021 October 2021	<u>Previous management update:</u> The Council has partnered with Evalian and is implementing their elearning portal for GDPR/DPA/Info Security training. The Council

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	staff and implement the approach that is planned to raise awareness for Members and senior management.			April 2022 June 2022 September 2022	has signed up to a Phishing Exercises service and will be launching exercises. The Council has also partnered with CM Alliance for further cyber awareness training. SLT and ELT have completed awareness training.
	b) Training completion should be monitored and there should be a record of all the training that has been provided and completed.			July 2021 October 2021 April 2022 June 2022 September 2022	Member training will be carried out in September after Summer recess. The training material and trainer have already been organised. Internal audit comment: Recommendation remains open until monitoring of the above awareness activity completion can be evidenced and awareness training for members completed. No update received from management since the last update.

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