# Appendix A - Overdue High Risk Actions

Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis	Updates Received since November 2023 Audit and Corporate Governance Meeting
21/22	24.21/22 GDPR Governance	The Data Flow Capture Spreadsheet will be updated to include the following areas: • name and contact details of joint controller (if applicable); • categories of individuals; • names of third countries or international organisations that personal data are transferred to (if applicable); • safeguards for exceptional transfers of personal data to third countries or international organisations (if applicable); • Data Protection Act 2018 Schedule 1 Condition for processing; • GDPR Article 6 lawful basis for processing; • link to retention and erasure policy document; and • whether personal data retained and erased in accordance with the retention policy document - reasons for not adhering to retention policy document (if applicable).	· ·	Alex Cowen	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years	Need to confirm Information Asset Owners following the restructure. ICT&D need to replan approach to complete action.  No ETD provided
21/22	29.21/22 Cyber Essentials	The Council will ensure that its IT estate is brought up to date in terms of patching as soon as possible	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/10/2022	Overdue	406	> 1 Year < 2 Years	ICT&D are now regularly patching the IT estate. Only item outstanding is to document to the process as specified in the audit action.  Action should be completed in January 2024.

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22/23	7.22/23 Leavers Process	We will ascertain why a leavers report was not provided to IT for April 2022 and take any action to ensure reports are provided consistently. Where reports are not received in the first week of the month, the IT Team will confirm with HR whether there any leavers.	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years	There were no leavers in March 2022 hence no report. HR and ICT&D are currently implementing a new JML process to ensure the complete end to end process is managed effectively with the correct workflow.
22/23	10.22/23 Council Tax	The Revenues Manager will undertake a review of current Council Tax arrears cases in order to identify cases where debts are not considered economically viable to be chased. These cases will be recommended for write off	High	Laverne Belle	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/2023	Overdue	72	Three Months	No ETD provided  Work continues of the preparation of the bulk write-off request and due to the sheer numbers of accounts involved this has taken significantly longer than originally envisaged.  Current ETD - March 2024
22/23	12.22/23 Housing Benefits	We will implement a process whereby we will cleanse the data available on accumulated aged debt and look to maximise recovery potential and write off any debt that we consider cannot be recovered.  This will include a periodic report on accumulated aged debt.	High	Baljit Nijjar	Thomas Mulloy/Ruth Hodson (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/2023	Overdue	72	Three Months	Current ETD - March 2024  Following the recent DWP improvement teams visit we are awaiting their support to review the collection of outstanding and new debt. Once that review has happened we will agree a bulk write-off of uncollectable debt.  Current ETD - March 2024
22/23	9.22/23 General Ledger	An exercise will be completed to identify all tasks to be completed as part of the month end process. A full month end timetable will be prepared, and tasks will be assigned to appropriate staff members. The completion of tasks will be confirmed each month to a relevant manager responsible for overseeing the closedown process. (Restated from 2021/22, we noted that this High action was reported to the Audit & Corporate Governance Committee as overdue	High	Jasvinder Dalvair	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/03/2023	Overdue	255	> Six Months < 1 Year	A full month end timetable is in place but there is no detail or breakdown of Finance tasks listed that should be completed. There is only a high level review of key milestones so this action has not been closed.  Current ETD - March 2024
22/23	9.22/23 General Ledger	The Council will review the password functions within Agresso to ensure that: • Password require changing on a periodic basis; and • Acceptable passwords will be subject to rules (certain lengths and unique characters to strengthen them and minimise the possibility of a security breach.	High	Steve Yeo	Tom Mulloy (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/03/23	Overdue	255	> Six Months < 1 Year	Not actioned yet - discussion underway with IT to establish the SSO progress. If not implemented, then alternative solution will be sought to address this gap.  No ETD provided
22/23	9.22/23 General Ledger	The Council will complete an exercise to identify those roles/positions requiring access to Agresso finance functions and the access/functions required. Based on this the Council will implement a training programme covering finance functions on Agresso. Training will be a requirement before system access is granted and will focus on the processes required as part of job roles. (Restated from 2021/22, we noted that this High action was reported to the Audit Committee as overdue)	High	Thomas Mulloy/Steve Yeo	Adele Taylor	Finance and Commercial	Finance and Commecrial	31/03/23	Overdue	255	> Six Months < 1 Year	Due to turnover of staff, this has not been carried out. However, work is underway to develop a clear plan to address this gap. Target date now Sept 2024 - this will factor in the recruitment of senior roles within the Systems team to help deliver the work programme  Current ETD - September 2024

22/23	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	The DR Policy The Council will document a Disaster Recovery Policy, independent of the Disaster Recovery Plan	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/03/23	Overdue	255	> Six Months < 1 Year	Need to undertake a review of policies in this space to see how detailed these are. Will also need to understand how a specific DR policy will work alongside our more general approach to business continuity.
22/23	4.22.23 Workforce recruitment and retention	As part of reviewing and updating the recruitment process, the following will be incorporated into procedure documents:	High	Adrian Thomson, Recruitment Lead	Sarah Hayward	Strategy and Improvement	HR	30/06/23	Overdue	164	Six Months	No ETD provided This will be completed 31 March 2024 when recruitment processes will be updated to complement this system and training completed. Updated in HRDLT.
22/23	4.22.23 Workforce recruitment and retention	Following the completion of service delivery plans for each service, outcomes relating to recruitment (such as hiring additional staff and restructuring) will be identified and referred to HR. Implications from the outcomes will be assessed and used to define recruitment initiatives.		Adrian Thomson, Recruitment Lead	Sarah Hayward	Strategy and Improvement	HR	30/09/23	Overdue	72	Three Months	Current ETD - March 2024  No update or ETD provided
22/23	16.22.23 Rent Arrears Recovery – Full Follow Up	An action plan will be put in place and monitored in order to resolve the problems and known issues surrounding the new Housing System. This will set out clear activities, responsible officers, and deadlines.  We will additionally consider escalation of risks to the corporate risk register.	High	Carol Maduka	Adele Taylor	Finance and Commercial	Revenues, Benefits and Charges	30/06/23	Overdue	164	Six Months	An action plan is in place and some issues have been resolved but others remain outstanding. There is now an NEC programme board in place to monitor the position.  Current ETD - March 2024
22/23	19.22/23 Creditors	We will develop an efficient method to output new suppliers over a given period of time for audit testing.  In addition, we will complete the following checks as part of setting new suppliers up: *supplier names against existing supplier accounts; *supplier addresses against existing supplier accounts; *bank details against existing supplier accounts; and *verification of bank details being input for new supplier accounts.	High	Jasvinder Dalvair, Interim Finance Manager	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/10/23	Overdue	41	Two Months	We're currently reviewing our final 35 suppliers and cross-checking with the departments to clarify why there are two suppliers with different names but the same bank details open."  Current ETD - March 2024
22/23	19.22/23 Creditors	- ' '	High	Jasvinder Dalvair, Interim Finance Manager	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/23	Overdue	72	Three Months	We have reviewed 3,795 suppliers from an Agresso report. After this review, we have potentially closed down 857, which were duplicates. Upon further examination of the report, we still need to investigate another 105. Once this is complete, we will have a unique list of suppliers. Additionally, we are implementing a report that will be run at the end of every month to identify and address any duplicate suppliers.  Current ETD - March 2024
22/23	22.22/23 Temporary Accomodation	In line with current plans, the Council will ensure that an up-to-date Housing Strategy and Homelessness Strategy is created. Additionally, progress against the action plan will be periodically monitored by an appropriate forum.	High	Chris Stratford, Director of Housing	Pat Hayes	Housing, Property and Planning	Housing	31/10/23	Overdue	41	Two Months	The Housing Strategy development will be complete by December 23. This has been held up as additional needs assessment work was required and also to allow work to be aligned with the Safe Homes strategy also being completed by Campbell Tickell.  Current ETD - December 2023

22/23	22.22/23 Temporary Accomodation	The Council will take action to improve the Council's rent arrears profile for those housed in TA. Collection rates will be reviewed via KPI reporting.	High	Caroline Bartos, Group Manager - Accommodation	Pat Hayes	Housing, Property and Planning	Housing	30/09/23	Overdue	72	Three Months	A spreadsheet with data required to set up all outstanding rent accounts will be forwarded to the NEC Project Team and IT. The NEC and Project Team will then proceed to create all outstanding TA occupancy rent accounts.  Current ETD – End of January 2024
22/23	22.22/23 Temporary Accomodation	The Annual Compliance Statement issued to Private Providers will be reviewed to assess whether the terms and conditions satisfies the Council's legislative duties as a housing provider. Following this, the Council will introduce a monitoring mechanism to ensure:  -Providers are only engaged with should they have a signed Compliance Statement in place;  -These Compliance Statements are reviewed and signed annually.	3	lan Blake, Special Projects Manager	Pat Hayes	Housing, Property and Planning	Housing	30/11/23	Overdue	11	One Month	Ian Blake has been given a new role as project officer with special responsibility for TA management and compliance. He now works with TA staff and accommodation services to improve compliance standards etc. All landlords have been written to regarding compliance information and ongoing contact now focused on collecting data.  New monitoring arrangements are now being drafted to use once data collected and private sector landlord forum to be established in March 2024. Comliance statements will be reviewed and initiaited after all compliance data has been established and landlords contacted.  Current ETD - March 2024
22/23	17.22/23 Health & Safety Full Follow Up	The CLT will determine further steps that can be taken to address training noncompletion. This may include directly contacting individual staff members or targeting directorates once breakdowns can be prepared.	High	Georgina Watson, Senior H&S Professional	Mark Halligan (Pat Hayes)	Housing, Property and Planning	Housing	30/06/23	Overdue	164	Six Months	The H&S team provide this data for each H&S Commitee and H&S Board with a request for members to follow up with the relevant staff to ensure completion.  Current ETD - March 2024
22/23	2.22/23 Follow Up Part 1	Management will review governance documentation required for the full year 2023/24 and put these in place to ensure clarity on levels of authority and on financial responsibilities and controls. Key documents will be standardised across the companies.	High	Ellen Little, Commercial Finance Lead	Thomas Mulloy (Adele Taylor)	Finance and Commercial	Finance and Commercial	30/11/23	Overdue	11	One Month	Governance documentation is in place for GRE5, with the exception of the Shareholders Agreement, which is in draft form currently. Strategic reviews of options are ongoing for JEH and DISH in order to establish the future direction of the companies. This may impact the governance documentation needed.  No ETD provided

# Appendix A - Overdue High Risk Actions By Aged Analysis (FY2021/22 and FY2022/23)

### > 1 Year < 2 Years

Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis	Updates Received since November 2023 Audit and Corporate Governance Meeting
21/22	24.21/22 GDPR Governance	The Data Flow Capture Spreadsheet will be updated to include the following areas: "name and contact details of joint controller (if applicable); categories of individuals; "names of third countries or international organisations that personal data are transferred to (if applicable); safeguards for exceptional transfers of personal data to third countries or international organisations (if applicable); "Data Protection Act 2018 Schedule 1 Condition for processing; "link to retention and erasure policy document; and whether personal data retained and erased in accordance with the retention policy document - reasons for not adhering to retention policy document (if applicable).		Alex Cowen	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years	Need to confirm Information Asset Owners following the restructure. ICT&D need to replan approach to complete action.  No ETD provided
21/22	29.21/22 Cyber Essentials	The Council will ensure that its IT estate is brought up to date in terms of patching as soon as possible	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/10/2022	Overdue	406	> 1 Year < 2 Years	ICT&D are now regularly patching the IT estate. Only item outstanding is to document to the process as specified in the audit action.  Current ETD - January 2024.
22/23	7.22/23 Leavers Process	We will ascertain why a leavers report was not provided to IT for April 2022 and take any action to ensure reports are provided consistently. Where reports are not received in the first week of the month, the IT Team will confirm with HR whether there any leavers.	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	30/09/22	Overdue	437	> 1 Year < 2 Years	There were no leavers in March 2022 hence no report. HR and ICT&D are currently implementing a new JML process to ensure the complete end to end process is managed effectively with the correct workflow.  No ETD provided

## > Six Months < 1 Year

Ye	ar Report Title	Recommendation	Rating		ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis	Updates Received
22/2	9.22/23 General Ledger	An exercise will be completed to identify all tasks to be completed as part of the month end process. A full month end timetable will be prepared, and tasks will be assigned to appropriate staff members. The completion of tasks will be confirmed each month to a relevant manager responsible for overseeing the closedown process. (Restated from 2021/22, we noted that this High action was reported to the Audit & Corporate Governance Committee as overdue	High	Jasvinder Dalvair	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/03/2023	Overdue	255	Year	A full month end timetable is in place but there is no detail or breakdown of Finance tasks listed that should be completed. There is only a high level review of key milestones so this action has not been closed.  Current ETD - March 2024

22/23	9.22/23 General Ledger	The Council will review the password functions within Agresso to ensure that: • Password require changing on a periodic basis; and • Acceptable passwords will be subject to rules (certain lengths and unique characters to strengthen them and minimise the possibility of a security breach.		Steve Yeo	Tom Mulloy (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/03/23	Overdue	255	> Six Months < 1 Year	Not actioned yet - discussion underway with IT to establish the SSO progress. If not implemented, then alternative solution will be sought to address this gap.
22/2	9.22/23 General Ledger	The Council will complete an exercise to identify those roles/positions requiring access to Agresso finance functions and the access/functions required. Based on this the Council will implement a training programme covering finance functions on Agresso. Training will be a requirement before system access is granted and will focus on the processes required as part of job roles. (Restated from 2021/22, we noted that this High action was reported to the Audit Committee as overdue)		Thomas Mulloy	Adele Taylor	Finance and Commercial	Finance and Commecrial	31/03/23	Overdue	255	> Six Months < 1 Year	Due to turnover of staff, this has not been carried out. However, work is underway to develop a clear plan to address this gap. Target date now Sept 2024 - this will factor in the recruitment of senior roles within the Systems team to help deliver the work programme  Current ETD - September 2024
22/2	14.22/23 Follow Up IT Business Continuity and Disaster Recovery	The DR Policy The Council will document a Disaster Recovery Policy, independent of the Disaster Recovery Plan	High	Simon Sharkey Woods	Sarah Hayward	Strategy and Improvement	ICT and Digital	31/03/23	Overdue	255	> Six Months < 1 Year	Need to undertake a review of policies in this space to see how detailed these are. Will also need to understand how a specific DR policy will work alongside our more general approach to business continuity.  No ETD provided

### < Six Months

Year	Report Title	Recommendation	Rating	Action Owner	ED/AD	Directorate	Service	Implementation Date	Status	Days (as at 15 December 2023)	Age Analysis	Updates Received
22/23	10.22/23 Council Tax	The Revenues Manager will undertake a review of current Council Tax arrears cases in order to identify cases where debts are not considered economically viable to be chased. These cases will be recommended for write off	High		Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/2023	Overdue	72	Three Months	Work continues of the preparation of the bulk write-off request and due to the sheer numbers of accounts involved this has taken significantly longer than originally envisaged.  Current ETD - March 2024
22/23	12.22/23 Housing Benefits	We will implement a process whereby we will cleanse the data available on accumulated aged debt and look to maximise recovery potential and write off any debt that we consider cannot be recovered.  This will include a periodic report on accumulated aged debt.	High	' "	Thomas Mulloy/Ruth Hodson (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/2023	Overdue	72	Three Months	Following the recent DWP improvement teams visit we are awaiting their support to review the collection of outstanding and new debt. Once that review has happened we will agree a bulk write-off of uncollectable debt.  Current ETD - March 2024
22/23	4.22.23 Workforce recruitment and retention	As part of reviewing and updating the recruitment process, the following will be incorporated into procedure documents:	High	Adrian Thomson, Recruitment Lead		Strategy and Improvement	HR	30/06/23	Overdue	164	Six Months	This will be completed 31 March 2024 when recruitment processes will be updated to complement this system and training completed. Updated in HRDLT.  Current ETD - March 2024

22/23	4.22.23 Workforce	Following the completion of service delivery plans	High	Adrian Thomson,	Sarah	Strategy and	HR	30/09/23	Overdue	72	Three Months	No update or ETD provided
	recruitment and retention	for each service, outcomes relating to recruitment (such as hiring additional staff and restructuring) will be identified and referred to HR. Implications from the outcomes will be assessed and used to define recruitment initiatives.		Recruitment Lead	Hayward	Improvement						
22/23	16.22.23 Rent Arrears Recovery – Full Follow Up	An action plan will be put in place and monitored in order to resolve the problems and known issues surrounding the new Housing System. This will set out clear activities, responsible officers, and deadlines.  We will additionally consider escalation of risks to the corporate risk register.		Carol Maduka	Thomas Mulloy/Ruth Hodson (Adele Taylor)	Finance and Commercial	Revenues, Benefits and Charges	30/06/23	Overdue	164	Six Months	An action plan is in place and some issues have been resolved but others remain outstanding. There is now an NEC programme board in place to monitor the position.  Current ETD - March 2024
22/23	19.22/23 Creditors	We will develop an efficient method to output new suppliers over a given period of time for audit testing. In addition, we will complete the following checks as part of setting new suppliers up: "supplier names against existing supplier accounts; "supplier addresses against existing supplier accounts; "bank details against existing supplier accounts; and "verification of bank details being input for new supplier accounts.	High	Jasvinder Dalvair, Interim Finance Manager	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	31/10/23	Overdue	41	Two Months	We're currently reviewing our final 35 suppliers and cross-checking with the departments to clarify why there are two suppliers with different names but the same bank details open."  Current ETD - March 2024
22/23	19.22/23 Creditors	We will undertake a review of all supplier accounts on Agresso and remove any duplicates.	High	Jasvinder Dalvair, Interim Finance Manager	Andy Jeffs (Adele Taylor)	Finance and Commercial	Finance and Commecrial	30/09/23	Overdue	72	Three Months	We have reviewed 3,795 suppliers from an Agresso report. After this review, we have potentially closed down 857, which were duplicates. Upon further examination of the report, we still need to investigate another 105. Once this is complete, we will have a unique list of suppliers. Additionally, we are implementing a report that will be run at the end of every month to identify and address any duplicate suppliers.  Current ETD - March 2024
22/23	22.22/23 Temporary Accomodation	In line with current plans, the Council will ensure that an up-to-date Housing Strategy and Homelessness Strategy is created. Additionally, progress against the action plan will be periodically monitored by an appropriate forum.	High	Chris Stratford, Director of Housing	Pat Hayes	Housing, Property and Planning	Housing	31/10/23	Overdue	41	Two Months	The Housing Strategy development will be complete by December 23. This has been held up as additional needs assessment work was required and also to allow work to be aligned with the Safe Homes strategy also being completed by Campbell Tickell.  Current ETD - December 2023
22/23	22.22/23 Temporary Accomodation	The Council will take action to improve the Council's rent arrears profile for those housed in TA. Collection rates will be reviewed via KPI reporting.	High	Caroline Bartos, Group Manager - Accommodation	Pat Hayes	Housing, Property and Planning	Housing	30/09/23	Overdue	72	Three Months	A spreadsheet with data required to set up all outstanding rent accounts will be forwarded to the NEC Project Team and IT. The NEC and Project Team will then proceed to create all outstanding TA occupancy rent accounts.  Current ETD – January 2024

22/23	22.22/23 Temporary Accomodation	The Annual Compliance Statement issued to Private Providers will be reviewed to assess whether the terms and conditions satisfies the Council's legislative duties as a housing provider. Following this, the Council will introduce a monitoring mechanism to ensure:  -Providers are only engaged with should they have a signed Compliance Statement in place;  -These Compliance Statements are reviewed and signed annually.	High	lan Blake, Special Projects Manager	Pat Hayes	Housing, Property and Planning	Housing	30/11/23	Overdue	11	One Month	lan Blake has been given a new role as project officer with special responsibility for TA management and compliance. He now works with TA staff and accommodation services to improve compliance standards etc. All landlords have been written to regarding compliance information and ongoing contact now focused on collecting data.  New monitoring arrangements are now being drafted to use once data collected and private sector landlord forum to be established in March 2024. Comliance statements will be reviewed and initiaited after all compliance data has been established and landlords contacted.  Current ETD - March 2024
22/23	17.22/23 Health & Safety Full Follow Up	The CLT will determine further steps that can be taken to address training non-completion. This may include directly contacting individual staff members or targeting directorates once breakdowns can be prepared.	High	g	Mark Halligan (Pat Hayes)	Housing, Property and Planning	Housing	30/06/23	Overdue	164	Six Months	The H&S team provide this data for each H&S Commitee and H&S Board with a request for members to follow up with the relevant staff to ensure completion.  Current ETD - March 2024
22/23	2.22/23 Follow Up Part 1	Management will review governance documentation required for the full year 2023/24 and put these in place to ensure clarity on levels of authority and on financial responsibilities and controls.  Key documents will be standardised across the companies.	High		Thomas Mulloy (Adele Taylor)	Finance and Commercial	Finance and Commercial	30/11/23	Overdue	11	One Month	Governance documentation is in place for GRE5, with the exception of the Shareholders Agreement, which is in draft form currently. Strategic reviews of options are ongoing for JEH and DISH in order to establish the future direction of the companies. This may impact the governance documentation needed.  No ETD provided