

## INTERNAL AUDIT PROGRESS REPORT:

SUPPLEMENTARY REPORT - FOLLOW UP STATUS DETAILS

London Borough of Southwark

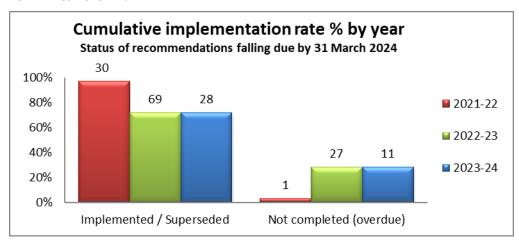
For presentation to the Audit, Governance and Standards Committee 5 September 2024

## INTERNAL AUDIT FOLLOW UP OF RECOMMENDATIONS - STATUS UPDATE DETAILS

As stated in our progress report, of the 541 high and medium recommendations relating to 2017-18 to 2023-24 that have fallen due to 31 March 2024 (financial year end), we have been able to confirm with reference to evidence that 502 have been fully implemented or superseded. This result represents an overall implementation rate of 92.8%, which is a significant increase from the 85.6% reported in June 2024.

Several recommendation target dates for 2022-23 audits continue to be revised multiple times, which is preventing a better implementation rate. However, the remaining longstanding recommendations from previous years yet to be fully implemented have reduced in number.

The chart below shows the relative implementation percentages with regards to recommendations raised and due for implementation across the years from 2021-22 to 2023-24.



The tables overleaf show the latest updates with regards to the recommendations not yet implemented, where these have been provided. The table excludes recommendations that have not fallen due or where no update has been provided. Where the revised date is August 2024, we will follow up implementation again ahead of the November 2024 meeting of the Committee.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
Children's and Adults Directorate		
2022-23 Safeguarding Adults		
1. Team management should complete quarterly sample checks to ensure referrals are completed and documented appropriately. Where issues are identified training should be implemented for the team or individuals to ensure these are resolved.  Medium	Team Manager - Safeguarding and DOLS - Adult Social Care 31 August 2023 January 2024 March 2024 August 2024	The Principal Social Worker and Strategic Lead for Safeguarding Adults and DoLS advised that the incoming Safeguarding and DoLS team manager joined the Council towards the end of February 2024. They have begun reviewing S42(2) Safeguarding Enquiries that are in excess of the recommended time frames. Part of this review has been to look at the quality of these and recommend training/ improvements. Once this work is complete a quarterly Safeguarding quality audit will be set up. The due date for this action has therefore been revised in discussion with management.
2. The Performance and Quality Team should undertake monthly audits focusing on safeguarding to ensure that any issues are identified and resolved by the team.  Medium	Team Manager - Safeguarding and DOLS - Adult Social Care 31 August 2023 January 2024 March 2024 August 2024	As above.
2022-23 SEND Finance		
1.1 The SEND Finance Team should ensure that invoices are paid within the terms set by the placement providers and in accordance with the terms and conditions of the Dedicated Schools Grant in relation to top-up funding. Where there are delays in making a payment or the invoice is disputed, the reason for the delay should be recorded on the invoice and the spreadsheet and the provider should be notified of when to expect a payment.  1.2 Payments should be made more frequently, for example, termly at least, to those providers who are currently only paid twice a year. Consideration should be given to the following to assist in the payment of invoices more frequently: use of Mosaic system; raising of blanket Purchase Orders to providers; encouraging providers to	Assistant Director for SEND <del>January 2024</del> <del>May 2024</del> August 2024	We were advised by the Business and Finance manager the following:  1.1 - The team was paying on average £500k per week until the end of January 2024. Since February 2024, the Council has paid £1M per week. This is based on SAP data. The Council managed to achieve this thanks to increased capacity.  1.2 - The teams process payments on a termly basis. The challenge is that the Council has to work sequentially (process one school at a time). We are going to change this with the DocuSign project because it will allow us to pay schools simultaneously. We now have a DocuSign account and last week completed a training session.  1.3 - The SEND team has been using the Capita database for 8 months.
join a framework where they are paid a monthly amount.  1.3 The consolidation of the data in the Capita system will help to improve the accountability and approval to mitigate the risk of		This has helped with the consolidation of data.  The Council will be completing a post-project review by the end of August 2024 with the project manager that implemented the solution.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
inappropriate payments. In addition, the production of regular aged creditors report would assist in the follow-up of non-payments to providers.  High		
<ul> <li>2.1 Spot checks should be undertaken on a periodic basis on a sample of cases to confirm that data is accurate on the spreadsheet, the Costing Form and Capita system. Evidence of these checks should be maintained.</li> <li>2.2 Local procedures should be developed to include the maintenance of the spreadsheet and the spot checks. This should be used as a training guide for new officers and a refresher guide for existing officers</li> <li>Medium</li> </ul>	Assistant Director for SEND  January 2024  May 2024  August 2024	We were advised by the Business and Finance manager the following updates:  The Council has agreed to carry out a post-project review by the end of August with the project manager that implemented the solution.  The project manager has agreed to report on the following:  Performance Assessment User Feedback Benefit Realisation Issue Identification Improvements
Environment, Neighbourhoods and Growth Directorate		
2020-21 South Dock Marina		
Both the Council and Marina should work together in order to agree a solution towards paperless working. Whilst we also recognise that the Marina does not have immediate capacity to deploy resources to scan all documentation, this is something that the Marina and Council should consider over the medium-long term to ensure all paper documentation has been scanned to either the Havenstar system (pending relevant modules and system upgrades) or the Marina's shared drive.	Harbour Master <del>June 2022</del> <del>April 2024</del> August 2024	We were advised by the Divisional Business Manager that the Marina Management Software went live on 1 April 2024. All customer records will be held on software. All historic information will be scanned to current customer records. Expected completion of scanning historic data to customer records is June 2024. The due date for this action has therefore been revised in discussion with management.
Medium		
2022-23 Cemeteries and Crematoria		
1. Our review supports consideration of developing an e-Booking Service, so applicants can book an appropriate slot and track their appointments online easily, safely, and securely.  Medium	Bereavement Services Manager  30 September 2023  To be followed up in December 2023  March 2024	We were advised by the Bereavement Services Manager that this action is still progressing with IT to move to vendor hosting. DPIA approvals were gained at the end of November and testing will commence shortly. With a view that the process should be completed and implemented by the end of March 2024. Unfortunately, there have been some delays with this and therefore the HLD was still to be reviewed by TDS.

Manager Responsible & Target  Month for Completion	Latest Implementation Status
<del>June 2024</del> August 2024	Therefore, a revised date has been set for this action in discussion with management.
Manager  Autumn 2023  January 2024  June 2024	We were advised that these recommendations have been implemented. We are awaiting evidence in support of management's assertions.  1.1 Any changes agreed will be taken to licensing Committee in June 2024 after consultation with traders.  1.2 The online booking and applications for temp traders and private operators has been implemented. The traders are now booking their weekly / daily pitches and paying through FGL.
Manager Autumn 2023 April 2024 Awaiting evidence	We were advised of the following update that the Online permit application now online as well as renewals. All 2024 licences renewed online. However, we are awaiting evidence.
Manager  Autumn 2023  April 2024	We were advised of the following updates: The FGL system has had teething problem. Ongoing discussions to resolve issues and hoping this will be resolved by the end of May. However, we are awaiting evidence.
Awaiting evidence	
	Month for Completion  June 2024  August 2024  Markets and Street Trading Manager  Autumn 2023  January 2024  June 2024  Awaiting evidence  Markets and Street Trading Manager  Autumn 2023  April 2024  Awaiting evidence  Markets and Street Trading Manager  Autumn 2023  April 2024  Markets and Street Trading Manager  Autumn 2023  April 2024

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
not feasible, then these reports should be requested from the Environment & Leisure Finance Team on a monthly basis.  Medium		
2022-23 - Parking Management and Estates Parking Permits		
<ul> <li>1.1 Establish a clear governance framework for parking services, with clear responsibility and accountability for all key financial and operational tasks, including reporting lines for the following: <ul> <li>Issuing and administering permit applications</li> <li>Call centre operations relating to parking.</li> <li>School crossing patrol officers</li> <li>Dealing with the early stages of representations and appeals and related correspondence</li> <li>Debt management and the associated follow up of untraceable vehicles.</li> <li>Updating and checking the annual schedules of parking fees and charges, price increases and variations, coming into effect ahead of each financial year once approved by Cabinet.</li> </ul> </li> <li>1.2 Develop a clear and comprehensive organisational structure chart and ensure this is maintained.  High</li> </ul>	Estate Parking Portfolio Holder  December 2023  March 2024  Awaiting evidence	<ul> <li>We were advised that the recommendation has been implemented however, we are awaiting evidence.</li> <li>The following are the previous updates from January 2024:</li> <li>The contact centre has an action plan in place regarding the issuing/administration of parking applications.</li> <li>Agreed action plan for implementation and compliance following meeting with parking team and finance.</li> <li>Schedules of parking fees and charges have been checked and will be implemented following cabinet approval.</li> <li>To be implemented - discussion held to discuss the effectiveness of the current arrangement. The Council are exploring the viability of merging street and estate parking services under one service to address the blurred lines in the organizational structure. Further discussions are planned.</li> </ul>
2.1 Introduce checklists for staff for each parking permit type to guide the completion of appropriate validation checks including the collection, scanning, and indexing of appropriate proof prior to issuing the estates parking permits, ensuring that all proof supplied must be in the same name and address as the permit application.  2.2 Introduce quality monitoring control procedures to confirm the validation of the estates parking permits granted to ensure all proof supplied is complete and in the same name and address as the permit application. We recommend that this is undertaken on a sample basis across the range of permit types, monthly. Any high error rates should be discussed, and actions agreed to improve this in future.	Head of Customer Operations  September 2023  March 2024  August 2024	<ul> <li>We were advised of the following updates:</li> <li>Local processes have been revised and will be iteratively revised to accommodate any changes to the Estate Parking application. The policy for Estate Parking requires sign off by the service owner.</li> <li>The ability to implement changes is predicated on the implementation of the new Imperial parking solution.</li> <li>The ability of the Contact Centre to triage and process Estate Parking applications effectively is dependent on the availability of adequate resources, as outlined in the audit report.</li> <li>The due date for this action has therefore been revised in discussion</li> </ul>

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
<ul> <li>2.3 Develop a policy and procedure on giving refunds.</li> <li>2.4 The quality monitoring control procedures should include checking for any duplicate permit applications occurring to ensure these are corrected monthly.</li> <li>2.5 Obtain a list of staff with Dash system access. Review staff system access to ensure the access permissions are appropriate in accordance with roles and responsibilities.</li> <li>High</li> </ul>		with management.
3.1 The nature and make-up of aged, bad, and uncollectable parking debts for the financial years 2019-20, 2020-21, 2021-22 and 2022-23 should be scheduled.  Medium	Area Manager - South /Finance Team <del>November 2023</del> <del>March 2024</del> August 2024	We were advised the of the following, that Finance reported some data was received from EN&G for year-end purposes, however, there is still improvements to be made in this area. Ongoing discussion between Finance and ENG for EN&Gs to complete write off reports for anything over 6 years.  The due date for this action has therefore been revised in discussion with management.
Finance Directorate		
2022-23 Insurance		
1. The Risk and Insurance Manager should escalate this again with the IT shared service requesting they provide the necessary documentation to ensure the Council is able to finalise sourcing their cybersecurity insurance. If this is not provided, then this should be raised to the appropriate senior management.  Medium	Corporate Risk and Insurance Manager  October 22 July 2023  September 2023 January 2024 March 2024 June 2024 August 2024	We were advised that there is currently no change in the position at this time. The following was the previous update:  Part a) - We were advised that the Strategic Director of Finance asked the Chief Digital and Technology Officer to conduct a review of current cyber security provisions in place and provide a report partly to see if the Council could meet the minimum insurer requirements as a starting point. This is an ongoing piece of work with the area still being explored. A cyber liability policy can be expensive with insurers often requiring fairly high deductibles, so the Council also needs to be clear on the benefit of putting one in place if there is a large element of self-insurance. We agreed that the position of this action will be reviewed in 2024 for further updates.  A further update was provided in January 2024 that this item is still under review, however the Council is not yet in the position to seek quotes with insurers.

Recommendation and Priority Level  2. On a six-monthly basis, a formal review of claims received should be undertaken identifying if there has been an increase in types of claims or locations of claims. These should be discussed at management meetings and reported to relevant departments as	Manager Responsible & Target Month for Completion  Corporate Risk and Insurance Manager  December 2022	We were advised that the Council aims to complete the first round of claims review in June after 6 months of the new system / coding claims. Therefore, a revised date has been set for this action in discussion with management.
necessary to identify actions to mitigate the incidence of claims in the future.  Medium	June 2023 September 2023 December 23 March 2024 June 2024 August 2024	management
Governance and Assurance Directorate		
2022-23 Payroll		
<ol> <li>The review of the overpayments procedure document should be completed to ensure guidance regarding sufficient and timely recovery action is in place. This recommendation was raised in the 2021/22 audit and has rolled over into this audit.</li> <li>Staff should be briefed on the reviewed procedure to ensure it is adhered to. This recommendation was raised in the 2021/22 audit and has rolled over into this audit.</li> <li>The Council should introduce a KPI to ensure recovery action for overpayments is monitored, such as a KPI for the time taken for overpayments to be added to the managed debt process.</li> <li>Medium</li> </ol>	Head of HR Operations/Principal SAP Officer 1 October 2023 January 2024 March 2024 December 2024	<ol> <li>The Head of HR confirmed that this requirement has been incorporated into a wider programme of work to document all payroll processes. This work is underway. The due date for this action has therefore been revised to September 2024.</li> <li>Aligned with the above work the Head of HR operations reminded all colleagues in the payroll and transaction teams of the protocol and its application. The work underway to document all payroll processes will be incorporated into induction and training processes for the team, following its completion. The due date for this action has therefore been revised to December 2024.</li> <li>A meaningful KPI and reporting framework will be submitted to the Director of People and Organizational Development for approval. The due date for this action has therefore been revised to September 2024.</li> </ol>
2022-23 Supplier Resilience		T
<ol> <li>Ensure all contracts include Key Performance Indicators to measure the performance of the supplier.</li> <li>Ensure all contract managers regularly monitor performance of the supplier in line with the contract.</li> <li>Medium</li> </ol>	Chief Officers / CMT Strategic Director of Finance and Assistance Chief Executive - Governance and Assurance August 2023 September 2023	The Head of Procurement advised that a review of Contract Management has been on-going since November 2023. It is presenting findings and recommendations on next steps to CMT 23 January 2024. The Procurement Act scheduled date to come into force is currently October 2024 and will entail more guidance around KPIs and reporting, as well as planning for future pipeline procurements as part of the preparation for these statutory requirements.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
	<del>January 2024</del>	The due date for this action has therefore been revised in discussion
	March 2024	with management.
	October 2024	
2023-24 - Hospitality and Gifts		
We recommend the environment and leisure log is utilised across all areas detailing all gifts even those that do not breach the threshold.  Medium	Director of People and Organisational Development March 2024 September 2024	We were advised by the Director of People and Organisational Development that the format of the Hospitality and Gifts register will be standardised drawing on good practice, including the log historically maintained by the (then named) Environment and Leisure directorate. The due date for this action has therefore been revised in discussion with management.
a) Guidance for staff and the induction process should be updated to confirm that where officers or managers change role within the year that they should complete a declaration of interest if applicable. The induction process should also be updated to include further training on DOIs and gifts and hospitality.  Medium	Director of People and Organisational Development <u>March 2024</u> September 2024	We were advised by the Director of People and Organisational Development that the Guidance for staff has been updated to reflect this requirement and the Induction process is still yet to be updated. The due date for this action has therefore been revised in discussion with management.
a) The officers required to complete declarations of interest should be expanded to include all social workers and agency workers.	Director of People and Organisational	We were advised by the Director of People and Organisational Development that the Guidance for the following:
c) Guidance available to staff in relation to gifts should be updated to include case studies so managers are more easily able to understand obligations with this guidance also including disposal of any gifts.  Medium	Development <del>March 2024</del> March 2025	a) A pilot Declarations of Interest project is underway in Children and Adult services. As part of the pilot, all staff in all roles (including social workers, agency workers and contractors) are required to complete a declaration. The period for declarations to be completed opened on 1 March and will close on 26 April. After this time, the pilot will be evaluated and learnings fed into council-wide changes, which will be introduced the following year.
		b) Case studies are to be developed.
		The due date for this action has therefore been revised in discussion with management.
2023-24 - Overtime Review		
3.1 The planned review of the Trade and Craft Agreement 2021 should involve stakeholders from across the Housing directorate,	Director of People and Organisational Development	We were advised by the Director of People and Organisational Development that the planned review of the Trade and Craft Agreement 2021 has not yet begun. The revised target date for completing this review, which will be undertaken via negotiation with trade unions. The

Recommendation and Priority Level  including the Head of Building Services, to ensure a desirable outcome for all stakeholders.  Medium	Manager Responsible & Target Month for Completion  April 2024  March 2025	Latest Implementation Status  due date for this action has therefore been revised in discussion with management.
Housing Directorate		
2022-23 TMO - Brenchley Gardens		
1. The TMO should ensure that all existing properties and newly let properties are subject to an annual gas servicing check which is completed by a Gas Safe registered engineer and the certificate is retained. Further, a central compliance gas servicing log should be created and updated once properties have had a gas service check to ensure that those which are due can be easily identified. High  2. The TMO should ensure that budget monitoring reports are produced each month, including the use of reserve and surplus fund, and should be shared at the monthly Management Committee meetings and ensure that all discussions including approval of the annual budget and reasons for variations are adequately documented.  High  3. The TMO should ensure that all works order and invoices are raised approved and retained in an organised manner to ensure the procurement process is in line with the Councils requirements and MMA between the TMO and the Council. The TMO should also review the systems for maintaining records relating to the procurement activity and consider automating the process where possible. High  4. The TMO should implement a central repairs log which lists all repairs across the properties at Brenchley Gardens. The log should include the results of any quality checks completed and if any follow up action was identified. A works order should be raised for all repairs which is authorised in line with the MMA between the Council and the TMO and linked to the procurement of the works if not under an ongoing contract.	Estate Manager / Housing Assistant / BGMA Chair  December 2023  March 2024  September 2024	The TMI advised us of the following:  BGMA operations have been in suspension since September 2023. The TMO office has been closed since that time as the organisation had no employed staff to manage / deliver business objectives / responsibilities; considering this BGMA has not progressed recommendations from the BDO audit.  An interim manager has recently been appointed.  The manager will be attending BGMA committee on 18/4/2024. The manager will also be meeting with the chair and TMO manager on 19/4/2024 to discuss / agree a priority work programme which will include the completion of BDO audit recommendations.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
5. The TMO should ensure that a tenancy agreement between the Council and the tenant, nomination letter, reasons for placement and identification checks are completed prior to the award of the property to an individual. These checks should all be retained on the individuals personal file should the Council require evidence of their completion.		
High		
6. The TMO should ensure that all pre-employment checks are completed prior to the appointment of a new started and should ensure that all documentation is securely retained in the individual's personnel file.		
High		
7. The Estate Manager should review the control account statement monthly to identify properties which are currently in arrears. Those which have been identified should have a formal letter sent to their address advising them of the arrears and a paid it needs to be paid by. Where payment cannot be made, an action plan should be produced to reduce the arrears.		
Further, properties currently in arrears should be report to the Management Committee to ensure adequate oversight and scrutiny of action plans in place for these properties.		
High		
8. The TMO should ensure that the monthly Management Committee meetings are formally documented to show discussions. The minutes should include any actions identified and the timeframe for implementation, along with evidence of discussion on key areas of the TMO.		
Medium		
2023-24 Social Housing White Paper / Regulation Bill		
1.1 The Council should look to review its allocations policy to ensure it is compliant with current government guidance and any specific requirements of the Social Housing Regulation Bill	Service Development Manager <del>June 2024</del> March 2025	The Manager advised us on the following: A review of the policy has been completed with a draft policy ready for consultation.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
1.2 The new policy should include a date for future review and assignment of responsibility for updating the policy to ensure that the policy is continually updated.		External guidance has been provided in order to aid in the development of the draft policy with reference to updated government guidance as well as updated legal, social and economic circumstances.
Medium		Consultation was due to take place in the summer 2024, however due to the elections, a revised timeline has been drafted with dates delayed by a few months. It is anticipated consultation will take place in autumn 2024 leading to a full implementation in early spring 2025.
2023-24 Statutory Disrepairs		
1.1 Acknowledgement of cases should be included in the ICasework actions that require completion.	Manager April 2024	We were advised that these have been completed therefore, we have requested that evidence of implementation is provided before being
1.2 The list of mandatory items that require completion on ICasework should be reviewed against all the items in the process document to determine if there are any other items that require completion that may be monitored more effectively through becoming a task on ICasework.	Awaiting evidence	marked as complete.
Medium		
2.1 Where it is not possible to meet timeframes despite the efforts of the Council, the attempts to complete these actions should be recorded.	Jackie Mulholland  April 2024	The Manager advised us on the following:  2.1 and 2.2 These are covered through regular reviews by the disrepair manager and team leaders as part of case reviews. Evidence of reviews
2.2 Time limits of actions and required targets need to be addressed	Awaiting evidence	to be provided at a later date
with staff to reaffirm the importance of documenting completion of items.  2.3 Managers and senior staff need to actively monitor the		2.3 A senior management report has been generated on the case management Icase to allow full overview of tasks per officer, current compliance is 74%. Evidence to be provided at later date.
completion of tasks to ensure they take place within required timeframes.		We were advised that these have been completed therefore, we have requested that evidence of implementation before these can be marked
Medium		as completed.
2023-24 TMO - Haddonhall		
1. The TMO should ensure that all works order invoices are approved	Estate Manager, Treasurer and	The Estate Manager advised us the following:
to ensure the procurement process is in line with the TMOs financial procedure that sets out the appropriate authorisers and financial delegations.  Medium	Vice Treasurer Ongoing	The TMO has accepted & implemented recommendation to comply with TMO policy. A Quarter 4 monitoring visit (end of April / May 2024). The TMI Officer will gather evidence of compliance, invoices for last three goods & service requisitions.
Mediani		goods a service requisitions.

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
<ul> <li>2.1 All HR policies and procedures should be reviewed and subject to Management Committee approval on an annual basis, to ensure that all specified content remains accurate and up to date.</li> <li>2.2 A performance management or competency framework should be implemented to support the staff in measuring their performance, recognising, and rewarding high performance, supporting staff development, and identifying and addressing under performance.</li> <li>Medium</li> </ul>	Estate Manager and Chair <del>31 March 2024</del> September 2024	The Estate Manager advised us the following:  TMO feedback, "Policy currently in draft. To be presented to the management committee for discussion and approval at their next meeting in May 2024". TMO handbook should include terms & conditions of employment including the performance management framework.  The review of all policies & procedures is an on-going project and is a standing item agenda at TMO management committee meetings. A review of all risk & services policies for HR, performance management will be undertaken.
3. Declarations of interests should be completed, signed, and dated by all Committee Members at the earliest opportunity and retained by the TMO.  Medium	Estate Manager and Secretary  June 2024  September 2024	We are awaiting an update.

## FOR MORE INFORMATION: AARON WINTER

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