

**INTERNAL AUDIT
PROGRESS REPORT:
SUPPLEMENTARY REPORT - FOLLOW UP
STATUS DETAILS**

London Borough of Southwark

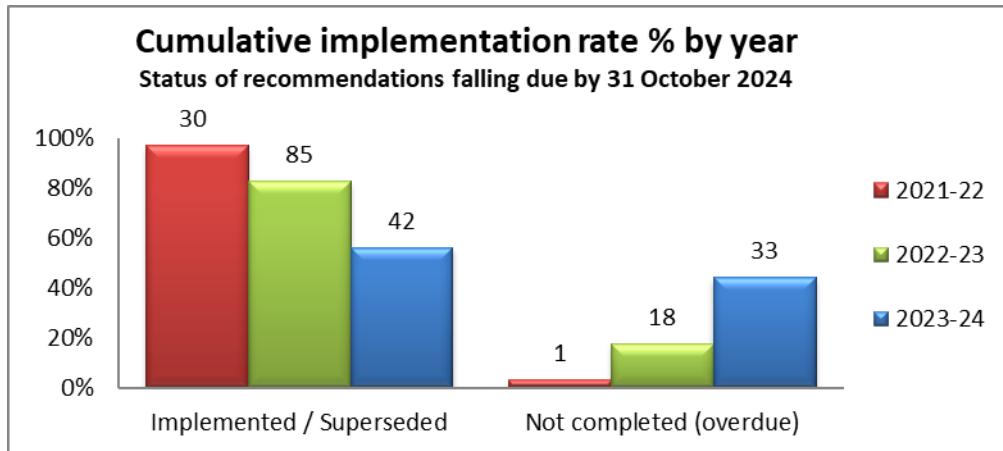
For presentation to the Audit, Governance and
Standards Committee 13 November 2024

INTERNAL AUDIT FOLLOW UP - STATUS UPDATE DETAILS

As stated in our progress report, of the 577 high and medium recommendations relating to 2017-18 to 2023-24 that have fallen due as of 31 October 2024, we have been able to confirm with reference to evidence that 532 have been fully implemented or superseded. This result represents an overall implementation rate of 99.2%.

Several recommendation target dates for 2022-23 and 2023-24 audits continue to be revised multiple times, which is preventing a better implementation rate.

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. For this meeting, we received updates for all recommendations. The table excludes recommendations that have not fallen due. Where the revised date is November 2024, we will follow up implementation again ahead of the February 2025 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		
<p>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.</p> <p>Medium</p>	<p>Team Manager - Safeguarding and DOLS - Adult Social Care</p> <p>31 August 2023 January 2024 March 2024 August 2024 January 2025</p>	<p>The Team Manager - Safeguarding and DOLS - Adult Social Care advised us:</p> <p>Quarterly safeguarding audit implementation has been delayed, pending the implementation of revised documentation and pathways for safeguarding referrals to flow between teams; following on from work detailed in Latest known progress sections.</p> <p>Work has continued in the interim to quality assure S42(2) Safeguarding Enquiries that are significantly in excess of the recommended time frames and confirm practice with these cases continues to safeguard the vulnerable individual; including training or mentoring for individual workers if indicated, along with planned revisions to safeguarding training requirements.</p> <p>The anticipated timescales for this are Q4 24/25, with potential for slippage as this work is interdependent with work to develop an online safeguarding adults referral currently underway as part of OPPD Community Flow project.</p>
<p>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.</p> <p>Medium</p>	<p>Team Manager - Safeguarding and DOLS - Adult Social Care,</p> <p>31 August 2023 January 2024 March 2024 August 2024 January 2025</p>	<p>The Team Manager - Safeguarding and DOLS - Adult Social Care advised us:</p> <p>As per 1. above, regular engagement with SAM's and operational Team Managers continues to follow up on over-running enquiries and case and/ or worker specific issues in these to ensure these are addressed, pending the implementation of planned changes to documents and referral processes.</p> <p>Ongoing monthly safeguarding audits will be implemented in tandem with these changes, and wider roll out to operational managers of the Power BI safeguarding adults dashboard. As above the anticipated timescales for this are Q4 24/25, with potential for slippage as this work is interdependent with work to develop an online safeguarding</p>

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		adults referral currently underway as part of OPPD Community Flow project.
2022-23 Public Health - Tobacco Control		
<p>To ensure that the Service continues to reflect the needs of the local population, the Council should update its Joint Strategic Needs Assessment; we have been advised that it aims to do so in early 2024, before the end of the current service contract. Additionally, we understand that the Public Health team is currently working on an Equality Impact Assessment (EQIA) alongside their Tobacco Control Strategy, as the EQIA will inform the strategy to ensure that local population needs continue to be met following any strategic changes. These plans should help to mitigate the risk that there is an unexpected growth in vulnerable groups.</p> <p>To enhance their current insight and marketing work, as well as their approach to compiling and analysing data, the Council should benchmark approaches with other Local Authorities in London.</p> <p>Medium</p>	<p>Tobacco Control Policy Officer, Head of Programme for Healthy Adults, Public Health Consultant, September 2024 December 2024</p>	<p>The Tobacco Control Policy Officer advised us:</p> <p>Southwark’s Joint Strategic Needs Assessment was updated in early 2024 and presented to the Health and Wellbeing Board. The Tobacco Control Strategy and EQIA will include up-to-date demography of smokers in Southwark and will inform the service re-commissioning. An EQIA is underway and will complement the strategy by providing a more in-depth look at service access amongst priority groups. The EQIA and Strategy draw upon several data sources using the most up to date evidence, data, and insights. Data used for both the Strategy and EQIA have helped to inform service developments in 2024-25. The Strategy and EQIA are currently being finalised and will be taken through relevant governance processes before end of 2024.</p> <p>Insight research has been completed and we are now waiting for the outcomes and final evaluation from the marketing campaign that has been conducted. A South-East London boroughs Tobacco Control group has been created in which best practice is shared and co-working on SEL wide tobacco projects is underway. The borough leads group have developed a joint action plan which includes the goal of developing a SEL wide tobacco control strategic framework, and the shared priority of ensuring equitable access to services for all, acting as a hub of excellence for ICS-level tobacco control.</p>
2023-24 Direct Payments		
<p>Quality reviews with sample checking of client files should be in place to ensure that all required documentation relating to a direct payment set up has been completed and saved on file, in accordance with quality review checklists to ensure the permanent file is comprehensive and well-organised, and retain these for independent review, including:</p>	<p>Head of Service, PB&CF Unit July 2024 March 2025</p>	<p>The Head of Service of the PB&CF Unit advised us:</p> <p>A Direct Payment Monitoring and Reconciliation procedure is in place but will be reviewed and updated over 2024/25. This will include trialling a proposed new process for periodical checks on pre-paid card data usage to look at potential misuses of funds. Initially, this will involve looking at a sample of high spend cases and will involve</p>

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<ul style="list-style-type: none"> • ID verification check results, and basic personal information • FA records / clients contribution assessment • Initial care plans / support needs tracked progress and changing needs. • carer / personal assistant information • valid legal agreements relating to the provision of eligible care services in place. <p>High</p>		<p>the creation of a review checklist as part of the procedure. The new checklist will include the areas highlighted in 3.2. In terms of ID checks, this is being taken forward as a cross-Adult Social Care initiative in joint working with the Council's with Anti-Fraud Team. Therefore, a revised date has been set for this action to be implemented.</p>
2023-24 Legal Fees		
<p>1. Legal services should develop and document a comprehensive workflow / process map, including routine and complex child protection work types and levels of risk, incorporating the key stages that are undertaken for each case, and aligned to Scheme of Management, and OPM, as appropriate. In addition, the workflow / process map should be included in the OPM.</p>	<p>Head of Safeguarding Team / Head of Law (Communities)</p> <p style="text-align: center;">June 2024 December 2024</p>	<p>The Head of Safeguarding & Community Services Legal advised us: Discussions have taken place between the Head of Team and AD for Safeguarding and with the Court Proceedings Manager.</p> <p>The Assistant Director advised us: The Audit and Learning Team will be launching a learning hub for social workers to use and access information about court proceedings and pre proceedings and process for making referral for legal advice. It was agreed by all parties that the Legal Planning meetings and Care proceedings Practice Guidance document from 2016 needs to be updated.</p> <p>Legal Services have updated the current document with relevant developments in law and practice. Additional updates have been agreed with the Care Proceedings Case Manager and appropriate internal links to Southwark protocols and documents to be made. The document will then be submitted to the Assistant Director for Safeguarding and Director of ASC and CSC for approval.</p> <p>The Care Proceedings Case Manager will continue to work with Principal social worker to update the guidance and CSC Learning Hub and include the Guidance documents. Any flow charts associated with the Guidance will be addressed as part of Learning Hub as required.</p> <p>We were also advised that throughout 2023 and 2024, Legal Services have worked with clients to review internal procedures on Supervision</p>

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		Orders and Plans, Section 20 and Transparency project. The team will continue to do so, as and when instructed by Children Services. This is informed by monthly meetings with Head of Service for Safeguarding and any actions from Permanence Taskforce Group and Tracking Panels. This is part of ongoing roles and responsibilities.
<p>2. Operational procedural guidance for the accurate preparation of reliable cost estimates should be in place to help ensure they are meticulously thought-out and, to guide any cost estimate negotiations with Childrens Services.</p> <p>Staff should be reminded that approval must be obtained prior to the appropriate requisite SAP process.</p> <p>The OPM should be updated to include the process and a cross-reference to the need to obtain approval of legal costs and disbursements in line with the Governance & Assurance Scheme of Management.</p> <p>Staff should be reminded that a client care opening email and cost estimate must be sent promptly on opening the file; also, that client care emails should be sent for any subsequent estimates.</p> <p>To strengthen quality monitoring, the file review checklist should include verification to evidence that when taking instructions at the outset of the matter.</p> <p>Fee earner financial performance monitoring mechanisms should be developed per work-type, regularly review financial performance against cost estimates and fee targets and establish appropriate accountability measures.</p>	<p>Head of Safeguarding Team, Head of Law (Communities)</p> <p>June 2024</p> <p>March 2025</p>	<p>The Head of Safeguarding & Community Services Legal Team advised us:</p> <p>That Legal Services is currently working with the Interim Business Support Manager to review the current procedure, underpinning cost estimations on files.</p> <p>Having completed the initial review of the cost estimate process, it became apparent that this was a more complex piece of work than envisaged and that a complete review and possible revision of the costs estimate process needs to be undertaken. A Project has now been commissioned and a Business Analyst allocated in September.</p> <p>The commissioned work will enable us to gain a clearer understanding of the <i>actual</i> costs associated with children's services cases, as opposed to totally relying on <i>estimated</i> figures. Additionally, it will provide insight into the current cost calculation process within the back end of our case management system. There may also need to be some future back-end development in collaboration with LN to improve how data is utilised for cost estimation going forward.</p> <p>In summary, this project has the potential to bring broader benefits by enhancing the accuracy of our cost estimation processes overall throughout the whole of Legal Services.</p> <p>In light of the above and the added context of the review of Legal Services structure and business model, the deadline for this action is Spring 2025.</p> <p>Staff have been reminded that a client care opening email and cost estimate must be sent promptly on opening the file; also, that client care emails should be sent for any subsequent estimates.</p>

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Environment, Sustainability and Leisure Directorate		
2020-21 South Dock Marina		
<p>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.</p> <p>Medium</p>	<p>Harbour Master</p> <p>June 2022</p> <p>April 2024</p> <p>August 2024</p> <p>January 2025</p>	<p>The Divisional Business Manager advised us:</p> <p>No new paper records have been created since the new Marina Management Software went live on 01 April 2024. Existing paper records requiring scanning and attaching to records amounts to approx. 1,500 pages. Staff resources are now in place to commence the scanning and saving against each relevant customer's records. Historic and redundant paper records which do not need to be retained will be shredded by the same date.</p>
2022-23 Cemeteries and Crematoria		
<p>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.</p> <p>Medium</p>	<p>Bereavement Services Manager,</p> <p>30 September 2023</p> <p>To be followed up in December 2023</p> <p>March 2024</p> <p>June 2024</p> <p>August 2024</p> <p>December 2024</p>	<p>The Bereavement Services Manager advised us:</p> <p>STS has delayed the progression as there were some concerns over the security of the application. They have now had these addressed by the software vendor and the MFA authentication for security is being progressed ready for testing it is anticipated that testing will begin in November 2024 and once if successful a live date for the application will be agreed.</p>
2022-23 - Parking Management and Estates Parking Permits		
<p>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:</p> <ul style="list-style-type: none"> Issuing and administering permit applications 	<p>Estate Parking Portfolio Holder,</p> <p>December 2023</p> <p>March 2024</p>	<p>The Head of Customer Operations advised us:</p> <p>The project to replace the existing Estate Parking IT application system has gathered pace in recent months. User Acceptance Testing and staff training is well under way. Planned go-live date is w/c 21</p>

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<ul style="list-style-type: none"> • Call centre operations relating to parking. • School crossing patrol officers • Dealing with the early stages of representations and appeals and related correspondence • Debt management and the associated follow up of untraceable vehicles. • 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. <p>Develop a clear and comprehensive organisational structure chart and ensure this is maintained.</p> <p>High</p>	<p>September 2024</p> <p>November 2024</p>	<p>October 2024. The new ‘Taranto’ application provides an improved customer experience, streamlining the application process, whilst ensuring adequate checks and evidential requirements are in place. It is already used successfully by at least 2 other similar London boroughs.</p> <p>Taranto replaces the ‘Imperial’ parking application, that was the original planned replacement for the current DASH system.</p>
<p>2. 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.</p> <p>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.</p> <p>Develop a policy and procedure on giving refunds.</p> <p>The quality monitoring control procedures should include checking for any duplicate permit applications occurring to ensure these are corrected monthly.</p>	<p>Head of Customer Operations</p> <p>September 2023</p> <p>March 2024</p> <p>August 2024</p> <p>November 2024</p>	<p>The Head of Customer Operations advised us:</p> <p>The service is currently undergoing a robust restructuring drive, which amongst other things is seeking to invest more resources into this work stream and support the implementation of these recommendations.</p> <p>Training has already been offered to more agents, but this is an interim arrangement, until the restructure is completed. Productivity and Conformance Coaches are now constantly monitoring agent calls and will boost efforts once the training on the Taranto system planned for 18 November 2024 takes place.</p> <p>A list of staff has already been identified for Dash, to be refreshed when Taranto goes live in November 2024.</p>

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<p>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.</p> <p>High</p>		
<p>3. 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.</p> <p>Medium</p>	<p>Area Manager - South /Finance Team,</p> <p>November 2023</p> <p>March 2024</p> <p>August 2024</p> <p>March 2025</p>	<p>We have been advised that discussions between Finance (ESL and Housing) and the Parking team have clarified that Finance will take on the responsibility to address the aged debtors and write off reports for anything over 6 years. The aim will be to complete a write off report by March 2025 as part of year end processes.</p>
<p>2023-24 - Tree Management Services</p>		
<p>3.1 The unique tree reference number held on the Confirm system should be reviewed and clearly linked to the case management of individual insurance claims and enquires case management.</p> <p>3.2 Procedures should be established to ensure there is a golden thread of all information captured about tree management, especially where trees may be implicated in a legal or insurance claim.</p> <p>Medium</p>	<p>Trees, and Ecology Services Manager</p> <p>July 2024</p> <p>April 2025</p>	<p>The Director of Leisure advised us:</p> <p>The recording of insurance claims on the council's tree management system has been limited due to the Council's current administrative capacity and staff vacancies in part due to an ongoing restructuring. The importance of implementing this as soon as possible is recognised as it ensures that the team's outputs are captured accurately in addition to improving outcomes of service users.</p>
<p>Resources Directorate</p>		
<p>2022-23 Insurance</p>		
<p>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</p>	<p>Corporate Risk and Insurance Manager</p> <p>December 2022</p> <p>June 2023</p>	<p>The Corporate Risk and Insurance Manager advised us:</p> <p>Work is ongoing with the Council's claims handlers to get to a point where they have a meaningful report that can be downloaded that does not require any manual intervention from Corporate Risk and Insurance Manager. The reports at the moment aren't pulling through</p>

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<p>necessary to identify actions to mitigate the incidence of claims in the future.</p> <p>Medium</p>	<p>September 2023 December 23 March 2024 June 2024 August 2024 December 2024</p>	<p>the right data so wouldn't be very helpful to anyone else in a department and they don't have capacity to add extra data to make it easily understood.</p> <p>The view is that departments (predominately Housing that this was aimed at) already know what the issues are that generate claims (leaks from above, burst pipes and radiators etc) and the data is unlikely to show any trends in terms of areas because claims come from all over the borough. Complaints data would be more beneficial because there is more of it (not everyone makes a claim) and more immediate (there is often a lag time with people submitting claims which can be quite lengthy).</p> <p>This will continue to be resolved however before the end of the year.</p>
<p>2023-24 Asset Hardware Management</p>		
<p>1a) STS should review the asset collection process, including the contents of the paperwork correspondence provided by the third-party collection company, to ensure there is a complete audit trail of assets, particularly those which are donated to/ collected by a third-party.</p> <p>b) STS should ensure that all assets scheduled for disposal/data destruction are appropriately flagged as such in the IT Asset Register. Once those assets have been collected by the third-party and are enroute to the data destruction/disposal/recycling phase of their lifespan, this status must also be captured in the IT Asset Register. The line entry of the asset must remain on the IT Asset Register to create a permanent audit trail, and the asset should be marked as "Disposed Of" or something similar. Similarly, if the asset is no longer in use and has not been marked for disposal/recycling, this status should also be recorded in the IT Asset Register.</p> <p>c) A review should be initiated to identify why so many laptops are in the "Assessing" phase and confirm if some of these assets are ready for re-distribution to new starters, as opposed to ordering brand new kit. The "Assessing" status of a laptop should be</p>	<p>Head of Operations, STS</p> <p>September 2024 December 2024</p>	<p>The Cyber Security Adviser advised us:</p> <p>a and e) The new disposal partner (Good Things Foundation) has just received the first batch of items to be disposed of. We are awaiting their certification. On receipt of the certificates, the Asset Management system will be updated.</p> <p>b and c) Processes are being updated.</p> <p>d) This has been implemented.</p>

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<p>considered only a temporary phase, and faulty assets that remain in warranty should be pursued in a timely manner once their fault has been identified. It may be an option to allocate this responsibility to a particular individual in the IT team to ensure consistency of process.</p> <p>d) STS should ensure that the IT Asset Register includes both the individual asset tag allocated by the Councils, and the asset's serial number, so there is a referenceable marker that can be monitored throughout the asset's lifespan. Even if one tag becomes lost, or the data unreadable over time, there is always a secondary option to ensure identification of the asset.</p> <p>e) In order to maintain a complete audit trail once the asset leaves the Council, any corresponding paperwork provided by third party disposal companies must be aligned to Council tracking methods or contain referenceable asset tags that can be validated between both parties. STS should review the contents of paperwork/ invoices provided when assets are collected, and where necessary initiate discussions with the third-party disposal company to identify a solution to improve visibility of assets once they are taken for disposal/recycling etc and the Asset Register is not tracking their status.</p> <p>High</p>		
<p>2 a) The directives listed in the 'LBS & STS Lost/Stolen Devices Policy' and 'IT Hardware Asset Management Policy' regarding Line Managers' responsibilities for the collection of hardware assets from leavers should be reworded to specify a defined timeframe that assets must be returned to IT following a leaver's final day at work (eg, within 3 days).</p> <p>b) For permanent home workers, it should be stipulated that the employee must physically hand their assets over to their Line Manager on their final day of employment, however, where this is not feasible, a process should be developed to aid the return of assets via a courier collection from their home address. Line</p>	<p>a, b, c & d) Service Delivery Manager, Southwark - September 2024 November & December 2024</p> <p>e) - Head of Operations, STS September 2024 December 2024</p>	<p>The Chief Digital & Technology Officer advised us:</p> <p>a) Southwark has requested from STS Child Ticket associated with Parent Leaver Tickets. The child ticket will be used to track and account for the HW return to IT. Managers will receive a ticket reference with a notification requesting that the HW is returned within timeframe. Southwark are still waiting for this to be implemented and tested before it can be embedded into the process. Southwark have appointed a dedicated Asset Manager Resource to provide assistance with new processes aligning improvements to manage the Asset Management Lifecycle with STS.</p> <p>b) Southwark does not have any permanent home users. As part of the Starters and Leavers Process Southwark are exploring drop off and</p>

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<p>Managers should make all efforts to reclaim assets that have not been returned within the agreed timeframe.</p> <p>c) Policies should also be updated with notification that should leavers fail to return Council-owned assets, financial recompense maybe extracted from their final salary payment to cover the loss. This should also be included in the Acceptable Use Policy, or similar policy which would be provided to users as part of their new starter induction process.</p> <p>d) Once these relevant policies have been amended, Line Managers should be provided with a copy of/link to their location, and it should be reinforced that it is their responsibility to ensure that assets are returned to IT when one of their employees leaves the Council.</p> <p>e) Service Request tickets act as an audit trail and must not be closed until either the asset is returned, or a decision is taken by someone in authority (ie, Senior Management) to mark it as Lost/Stolen. If this is the case, the Service Request ticket must be updated with this information to close the audit trail.</p> <p>Medium</p>		<p>pickup options. Southwark is improving the process where laptops are returned to the Tooley Street head office for remote workers. Managers are currently advised to book the return of IT equipment issued to home users unable to attend the office.</p> <p>c) Southwark is unable to extract the cost of hardware from the final salary payment for leavers to cover the loss of equipment not returned. Southwark has requested Department Cost Codes as part of the New Starter forms which can be used in the event hardware is not returned.</p> <p>d) Southwark will inform Managers on the AUP policy amendments with clear sign posting to document location. This will also be added to the Starter and Leavers Forms. We were advised by the Cyber Security Adviser:</p> <p>The Cyber Security Adviser advised us:</p> <p>e) It has been decided to implement a process whereby a separate ticket is automatically raised for the return of IT equipment. This allows the original leaver request to be completed without losing an audit trail of unreturned equipment. This has been developed and is currently in testing.</p>
<p>3 a) STS should define reasonable parameters by which an investigation into laptops that have not logged onto the network for a prolonged period of time is warranted. Once those parameters have been defined, STS should extract a report of all laptop users that have not logged onto the network and perform an investigation into each case. If the user is on maternity leave, long-term sickness, or under suspension, this can be easily validated by Human Resources or the users' line managers.</p> <p>b) The Hardware Asset Register should be updated should any assets be ultimately identified as lost or stolen.</p> <p>c) The Hardware Asset Management Policy (plus policies provided to new employees such as an Acceptable Use Policy) should be updated with a clear directive to all users that they must log onto the network at least once a month, irrespective of their</p>	<p>a & b) Head of Operations, STS September 2024</p> <p>c) Service Delivery Manager, Southwark September 2024 December 2024</p>	<p>a& b) We have confirmed with reference to evidence that these recommendations have been implemented.</p> <p>c) The Chief Digital & Technology Officer advised us:</p> <p>Southwark will confirm if this is viable with HR, as it may not be possible to request that all users on Long Term Leave login at least once each month. However, it might be possible for STS to put laptops in an Active Directory OU that identifies and manages Laptops allocated to users on Long Term Leave which Southwark will explore with STS. With exception to standard configuration policies.</p>

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<p>employment status (eg; maternity, long-term sickness - although the constraints of employees who are under suspension must be reviewed on a case by case basis, as it may be prudent that employees under suspension have their AD accounts disabled, which would prevent them from logging onto the network.)</p> <p>Medium</p>		
<p>2023-24 Cyber Security</p>		
<p>1a) STS should conduct a thorough review of all domain administrator accounts to determine the necessity of each account. Ensure that only personnel who require administrator access for their job functions are granted such privileges.</p> <p>b) Apply the principle of least privilege by ensuring that users have only the access necessary to perform their duties. Where possible, downgrade excessive privileges and consider using role-based access control (RBAC) to manage permissions more effectively.</p> <p>c) Establish a process to review domain administrator accounts at least bi-annually to ensure that access rights remain aligned with job requirements and to identify any dormant or unnecessary accounts for removal.</p> <p>d) Update the incident response plan to include specific procedures for responding to incidents involving misuse or compromise of domain administrator accounts.</p> <p>High</p>	<p>Chief Security Officer, Shared Technology Services</p> <p>November 2024</p> <p>TBA</p>	<p>a to c) We have confirmed with reference to evidence that these recommendations have been implemented.</p> <p>d) The Cyber Security Adviser advised us:</p> <p>IR team contacted with directions to update IR plan and run an IR scenario. Date to be confirmed.</p>
<p>3 a) The Council should determine an appropriate percentage of staff that should complete the annual cyber security training (best practice would be 98%).</p> <p>b) Arrangements should be put in place for ensuring that the cyber security training is completed by all members of staff, as required, which could include:</p>	<p>Chief Security Officer, Shared Technology Services</p> <p>September 2024</p>	<p>The Cyber Security Adviser advised us:</p> <p>a) Mimecast training has been rolled out as of September 2024. 3 videos selected as required training (note - management have made cyber training mandatory). Initial uptake -1/3 of council has completed initial training. Goal is to ensure all staff who use technology will complete the training.</p>

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<ul style="list-style-type: none"> Identifying specific staff members who are required to complete the training and working with their line managers to ensure completion. Ensuring regular, top-down communication to increase awareness of the training. Requiring completion of the e-learning before issuing new devices to individuals or as part of performance and progression reviews. <p>c) Initiate a data cleansing exercise to correct organisational structure anomalies and remove or consolidate duplicate accounts. This will provide a more accurate view of the compliance status.</p> <p>d) Develop enhanced reporting mechanisms that can segregate data between LBS staff and agency staff, providing clear and distinct compliance figures for each group.</p> <p>e) Improve monitoring and reporting mechanisms to ensure that all devices are consistently and effectively protected by the AV solution.</p> <p>High</p>		<p>b) Mimecast linked to Active Directory, providing ability to track completion. On-going communication with business leaders on-going to drive awareness of training. Current focus: passwords (in coordination with new password policy and password refresh project), phishing, data protection.</p> <p>c) Work on-going between Southwark and STS to clean up Active Directory. Future initiative to review and update JML process will assist with this.</p> <p>d) Mimecast linked to Active Directory, providing ability to track completion by user groups. Working on identifying staff vs workers. Working with council team on tracking training performance.</p> <p>e) Defender for Endpoint provides continual monitoring for this. Devices that are seen to be inactive are investigated.</p> <p>The agreed actions have been substantively implemented. We have requested that evidence of implementation is provided before we can sign off as complete.</p>
<p>5 a) The Council should develop and implement a comprehensive cyber security policy to clearly outline the Council's approach to managing and protecting information assets from cyber threats.</p> <p>b) The policy should include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> Roles and responsibilities for cyber security within the Council and STS User access controls and management Data protection and privacy measures. Incident response and reporting procedures Third party supplier relationships Regular review and updating of security measures Training and awareness programs for all staff members. 	<p>Chief Security Officer, Shared Technology</p> <p>August 2024</p> <p>December 2024</p>	<p>The Cyber Security Adviser advised us:</p> <p>The Council has written and published 4 new policies, which are published on the Intranet:</p> <ul style="list-style-type: none"> Acceptable Use Policy Password Policy Software Application and SaaS Policy Privileged Access Management Policy <p>STS and partner councils (Brent, Lewisham) are working on:</p> <ul style="list-style-type: none"> Cyber Security Policy Data Management Policy Applications Security Policy Vendor Management Policy Lost or Stolen Equipment policy Remote Access Policy Security Awareness & Training Policy

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<p>c) The policy should be communicated to all members of the Council and be readily accessible.</p> <p>Medium</p>		<ul style="list-style-type: none"> • Information Asset Owner policy • Network Security Policy • Privilege Access Management • Software Asset Management
Governance and Assurance Directorate		
2022-23 Member Officer Protocol		
<p>Review the Member Officer protocol periodically with any updates to be noted on the front of the procedure, in order for Officers and Members to be aware of the changes more easily.</p> <p>The relations policy in the protocol should mention the point of contact if an officer or member wants to address any concerns, such as bullying or inappropriate relations.</p> <p>Medium</p>	<p>Assistant Director Governance and Assurance - Doreen Forrester-Brown</p> <p>September 2024</p> <p>March 2025</p>	<p>The Assistant Director Governance and Assurance advised us: Members and Officers are currently being consulted on an extensively revised Member Officer Protocol which responds to the recommendations in the audit and changes to the Council's Member Code of Conduct. The revised Protocol was considered by CMT in September 2024 and is now being considered by Members. The revised Protocol will be submitted to AG&S Committee in February 2025 and presented to Council Assembly for approval in March 2025.</p>
2022-23 Supplier Resilience		
<p>Ensure all contracts include Key Performance Indicators to measure the performance of the supplier.</p> <p>Ensure all contract managers regularly monitor performance of the supplier in line with the contract.</p> <p>Medium</p>	<p>Chief Officers / CMT</p> <p>Strategic Director of Finance and Assistance Chief Executive - Governance and Assurance</p> <p>August 2023</p> <p>September 2023</p> <p>January 2024</p> <p>March 2024</p> <p>October 2024</p> <p>February 2025</p>	<p>A refreshed approach for Procurement in response to new legislation is in development. The Procurement Act has recently been delayed by Government to February 2025.</p>

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2023-24 - Hospitality and Gifts		
<p>We recommend the environment and leisure log is utilised across all areas detailing all gifts even those that do not breach the threshold.</p> <p>Medium</p>	<p>Director of People and Organisational Development</p> <p>March 2024</p> <p>September 2024</p> <p>December 2024</p>	<p>The Director of People and Organisational Development advised us: Executive Assistants are responsible for maintaining each department's register of hospitality and gifts. The HR team is working with the Head of the Chief Executive's Office and Executive Support to implement a revised template register, which will be applied consistently by all departments.</p>
<p>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.</p> <p>Medium</p>	<p>Director of People and Organisational Development</p> <p>March 2024</p> <p>September 2024</p> <p>December 2024</p>	<p>The Director of People and Organisational Development advised us: The responsibility for the Council's induction process has been transferred to the Organisational Development team, which is undertaking a comprehensive review of the approach to induction, including the information that is shared with new starters during this process. This will include addressing the audit recommendation regarding the declaration of interest process.</p>
2023-24 Records Management		
<p>To ensure that an audit trail is retained, there should be a central log to record by who and when the data was deleted for electronic files. Each record owner may have their own central log to manage, or the status of a record in the information asset register could be included and updated by record owners when they are deleted or moved.</p> <p>High</p>	<p>Corporate Information Governance Officer</p> <p>June 2024</p> <p>December 2024</p>	<p>The Corporate Information Governance Officer advised us: All Information Asset Registers have been transferred onto SharePoint so that they are easily accessible by all asset owners. The registers have been updated to include guidance notes, links to the retention schedule and named asset owners. An additional column to record the deletion of electronic records will be added to each register.</p>

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
2023-24 IR35		
<p>1. Review the procedure notes on off-payroll workers and IR35 regulations to ensure it documents the arrangements at the Council, clarifies responsibilities and ensures CEST assessments are completed appropriately. The procedures should include:</p> <ul style="list-style-type: none"> • Documented responsibilities • Training requirements • Record-keeping expectations • Distinction between PSCs and self-employed individuals • Clarification on how individuals operating via their PSC are added to payroll as off-payroll workers. This should include, where appropriate, how to account for VAT if this is charged on the supplier invoice. • An outline of the process for the steps to be undertaken following the completion of the CEST tool. This should outline the individuals or teams responsible for each stage. <p>Once reviewed and implemented, the policy / procedure notes should be published and communicated across the Council.</p> <p>High</p>	<p>Contract Specialist March 2024</p> <p>Head of Resourcing July 2024 May 2025</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> • review existing procedures to identify any gaps (January 2025) • consult with stakeholders, including colleagues in Procurement and Finance, to ensure procedures address all relevant requirements and reflect best practice (February 2025) • finalise updated procedures (March 2025) • develop communication plan (March 2025) • publish updated procedures (March 2025) • conduct briefing sessions and online workshops (May 2025)
<p>2. Maintain a detailed record of all off-payroll workers that can be used centrally for monitoring.</p> <p>Communicate the new arrangements to all Hiring Managers</p> <p>Ensure a clear process is in place for any inconclusive determinations - e.g. identifying the individual responsible for making the final decisions and any training requirements this individual must complete prior to being considered the responsible person</p> <p>High</p>	<p>Head of Resourcing / Contract Specialist July 2024 March 2025</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> • create a centralised database (February 2025) • establish process for inconclusive determinations, including assignment of responsibility for a final decision (February 2025) • develop training and communication materials (March 2025)

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<p>3 Ensure there is a clear process in place for documenting who will issue the SDS and who it needs to be issued to</p> <p>Ensure there are documented timelines by which SDSs should be issued (prior to the start of a contract)</p> <p>High</p>	<p>Contract Specialist</p> <p>July 2024</p> <p>March 2025</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> map out the SDS process (January 2025) create a tracking tool (February 2025) implement an audit process to periodically monitor compliance (March 2025)
<p>4. Introduce a dispute management process / guidance</p> <p>Ensure there is a documented appeals process for both internal stakeholders and PSCs / agencies</p> <p>Medium</p>	<p>Contract Specialist</p> <p>July 2024</p> <p>March 2025</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> develop dispute resolution guidance (February 2025) establish appeal procedure (March 2025)
<p>5. Establish arrangements to monitor the employment status of existing workers (and enforce them - for example by seeking evidence that any changes in the status of existing workers have resulted in a new assessment)</p> <p>Ensure all SDSs are reviewed at least annually to ensure no changes have happened to the services provided</p> <p>Review all PSCs and contracts annually.</p> <p>Medium</p>	<p>Head of Resourcing</p> <p>June 2024</p> <p>April 2025</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> establish a review schedule: (March 2025) complete the first annual review (April 2025)
<p>6. Ensure off-payroll working compliance is regularly reported to Senior Leadership, to ensure there is an appropriate level of oversight over off-payroll working</p> <p>Medium</p>	<p>Director of People and Organisational Development</p> <p>July 2024</p> <p>June 2025</p>	<p>The Director of People and Organisational Development advised us that this will be implemented following the first annual review (see response to recommendation 5)</p>
<p>7. Conduct a training needs analysis and implement a training programme to help Hiring managers understand the requirements of and comply with off-payroll working and the Council's procedures. Training should also be provided to Procurement so</p>	<p>Contract Specialist</p> <p>July 2024</p>	<p>The Director of People and Organisational Development advised us of the revised plan for addressing this recommendation:</p> <ul style="list-style-type: none"> training needs analysis (January 2025) development of training materials (April 2025)

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
<p>they can provide advice to Hiring Managers where needed. HR Managers should also be trained for when a contractor falls inside the IR35 and needs to be added as an employee and needs to provide relevant advice to Hiring Managers.</p> <p>Medium</p>	<p>May 2025</p>	<ul style="list-style-type: none"> training to commence (May 2025)
<p>2023-24 Climate Strategy</p>		
<p>1. The Council should draft and approve an Accommodation Strategy.</p> <p>2. The Council should consider implementing a joint Corporate Facilities Estates Model incorporating all buildings under Council control across the directorates to increase the Council's ability to reduce its own emissions. If completed, this should consider the capacity of the Corporate Facilities Team and its ability to monitor both day to day compliance and an ongoing program of capital works.</p> <p>3. The Council should ensure information is generated and maintained on the reduction of emissions achieved through capital projects and shared at the Director Steering Group and incorporated within the annual report submitted to Cabinet.</p> <p>Medium</p>	<p>Director of People and Organisational Development - Ben Plant</p> <p>September 2024</p> <p>May 2025</p>	<p>The Director of People and Organisational Development advised us:</p> <p>Recommendations 1 & 2</p> <p>In June 2024, the Corporate Change Board agreed to establish a Corporate Real Estate (CRE) workstream as part of the Future Southwark transformation programme. This workstream is supported by a dedicated Programme Manager.</p> <p>There are four elements to the CRE workstream:</p> <ul style="list-style-type: none"> development of a new CRE model, which will address recommendation 2 (November 2024 with a phased approach to implementation) development of a strategic asset management plan, which will address recommendation 1 (February 2024) compliance, which will contribute to addressing recommendation 2 (May 2025) use of data, which will indirectly contribute to addressing both recommendations 1 and 2. <p>Delivery is aligned to the council's climate change strategy and governed by the CRE Oversight Group, Corporate Change Board, and Directors' Champions Group.</p> <p>Recommendation 3</p> <p>Wherever possible, the carbon saving to be achieved by projects funded from the council's Climate Capital Fund should be stated during the application process. This is also a requirement of projects delivered through the Green Buildings Fund, where contributions are</p>

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		<p>collected from developers at a set cost per tonne of carbon and must be spent at a rate to match.</p> <p>The annual report presented to Cabinet in September 2024 included updated emissions data on council-generated and borough-wide emissions, as per the recommendation.</p>
Housing Directorate		
2022-23 TMO - Brenchley Gardens - INTERNAL AUDIT REPORT SUPERSEDED		
<p>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</p> <p>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</p> <p>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</p> <p>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</p>	<p>Estate Manager / Housing Assistant / BGMA Chair</p> <p>December 2023</p> <p>March 2024</p> <p>September 2024</p> <p>N/A</p>	<p>The TMI advised us:</p> <p>Brenchley Gardens (BG) performance continues to fall short of duties in its management agreement including addressing audit recommendations. Issues on with BG failure to perform have been presented to legal services (M Micklewright) and RI Manager Nat Stevens, the conclusion is enforcement action in accordance with chapter 1, clause 19 by virtue of the service a ‘supervision notice’ to take control of BG operations etc. is the proposed course of action.</p> <p><i>This is reported to the AGSC for completeness but will be removed in the next follow-up status report.</i></p>

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
<p>Council and the TMO and linked to the procurement of the works if not under an ongoing contract. High</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p>		
2023-24 TMO - Haddonhall		
<p>1. The TMO should ensure that all works order invoices are approved to ensure the procurement process is in line with the TMOs financial procedure that sets out the appropriate authorisers and financial delegations.</p> <p>Medium</p>	<p>Estate Manager, Treasurer and Vice Treasurer</p> <p>Ongoing</p> <p>Awaiting evidence</p>	<p>We were advised that these have been completed therefore we have requested that evidence of implementation is provided before we can sign off as complete.</p>

Recommendation and Priority Level	Manager Responsible & Target Month for Completion	Latest Implementation Status
<p>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.</p> <p>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.</p> <p>Medium</p>	<p>Estate Manager and Chair</p> <p>March 2024</p> <p>September 2024</p> <p>Awaiting evidence</p>	<p>We were advised that these have been completed therefore we have requested that evidence of implementation is provided before we can sign off as complete.</p>
<p>3. Declarations of interests should be completed, signed, and dated by all Committee Members at the earliest opportunity and retained by the TMO.</p> <p>Medium</p>	<p>Estate Manager and Secretary</p> <p>June 2024</p> <p>September 2024</p> <p>Awaiting evidence</p>	<p>We were advised that these have been completed therefore we have requested that evidence of implementation is provided before we can sign off as complete.</p>

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