

Audit Title	Finding	Finding Rating	Agreed Action	Action Status	Responsible People	Implementation Deadline	Progress Update
Data Protection	<p>Following a recent breach of the data protection policy, a "Data Protection Overview Audit" was undertaken by independent consultants, Information Management Training Services Limited (IMTS) in April 2014. The outcome of the review raised several recommendations to improve the management of data protection.</p> <p>At the time of our internal audit review the IMTS report had not been finalised and as such recommendations had not been agreed or an action plan to implement recommendations prepared. We reviewed the draft recommendations made in the IMTS report with the Senior Information Governance Officer who confirmed that a number of these recommendations in relation to the following areas are still outstanding:</p> <ul style="list-style-type: none"> - Awareness and training - Retention schedule for documents - Vulnerability to one individual officer - External contractors responsibilities 	Medium	The IMTS report should be finalised and an agreed action plan developed to address the recommendations made.	Open	David Taylor	30/06/2015	<p>Dedicated GDPR Data Protection Officer has been in post since September 2017.</p> <p>A revised training and awareness programme will be implemented from April 2018 in respect of the new GDPR and updated Data Protection Policy.</p> <p>Retention schedule for all documentation is being reviewed department by department, as part of the corporate roll out of EDRMS.</p> <p>Short term resilience from Partner agencies, succession planning to be implemented by 31st December.</p> <p>External contractors responsibilities will be reviewed as part of the contract management review.</p> <p>More robust wording and guidance around Safe Haven and Clear Desk will be included in the Data Protection Policy . The policy draft is to go to Cabinet on 13th June.</p>
Data Protection	<p>The Senior Information Governance Officer keeps a log of all the Data Sharing agreements in the Council. Before access is given for a data sharing agreement, it is required to be authorised by a senior member of staff.</p> <p>We tested a sample of 5 data sharing agreements and noted a lack of evidence of authorisation for all five cases. It was also identified that documents were not kept in a file together and the Senior Information Governance Officer did not have the signed copies of the final agreement that was issued.</p> <p>The Data Protection Policy states that once an agreement has been logged on the register it is required to be reviewed every 12 months. During the testing of 5 data sharing agreements there was an absence of timely review in all cases.</p>	Medium	During the audit the Senior Information Governance Officer took immediate action to organise the files so that information was accessible in a grouped folder. He also updated the log to include additional columns to prompt documentation of future agreements. A review should be carried out of all agreements currently in place to find all documentation relating to the agreement and store it together in a central folder. It is important that the SIGO is in full knowledge of all Data sharing agreements within the Council. An annual review of each of the agreements should be carried out to ensure that they are still in place and to update any areas where the conditions of the sharing agreement have changed. For major changes these should require a new agreement to be submitted and authorised.	Open	David Taylor	30/06/2015	Working with NCC and other partner organisations to update the spreadsheet. The Governance Support Officer is working with the Data Protection Officer on this.

Economic development and regeneration	<p>If there is a change in the Project Manager, they have the opportunity to meet and discuss their project with the LGSS Project Support to ensure they are compliant with the relevant policies, legislation, required documents and are working in accordance with the Council's policies.</p> <p>However, this is not a mandatory approach and requires the new Project Manager to actively seek this support.</p>	Low	Where new project managers are appointed there should be a formal process of reviewing existing documentation and explaining the Council's processes to individuals undertaken by the Transformation Project Manager.	Open	Alice Turrell	28/02/2017	Changing Project Manager... Each of the Directors is aware of the Project Support available which is now provided by NBC not LGSS. This will be fully detailed in the new programme Project Management Framework that has been completed as at 31 March 2018. As part of this framework it is intended that a project
Economic development and regeneration	<p>Project summaries are maintained for individual projects which detail project leads, current status and whether an appropriate monthly highlight report or other progress report has been submitted and reviewed.</p> <p>There is no overall document to summarise all projects currently underway within the Council. Having such a document would provide the opportunity to review the department progress as a whole and ensure all relevant documents have been prepared in compliance with the established process.</p>	Low	A checklist should be maintained, documenting all projects, to ensure all required documents are completed along with dates they are prepared and reviewed to ensure continued compliance with the established process.	Open		30/06/2017	A project register is maintained on a monthly basis and is reported to the Northampton Alive Board. This details the individual project, the project leads the current status, and whether a highlight report has been submitted for that past reported month. It also reports the progress for that reporting period. If there were any corporate risks or corporates issues reported by the board, this would initiate a exception report, which is cascaded up to management board for guidance and decision making. Due to the post of Director of Regeneration, Enterprise and Planning being vacant, the process for monitoring the projects has stalled.
Housing options-1	<p>There are no procedure notes available to formalise the operation of controls and processing of Temporary Accommodation. Although all members of the Housing Options & Advice Team are responsible for ensuring that they are up-to-date with legislative changes –and this is reflected in their job descriptions –it is the team leaders and the Housing Options & Advice Manager who are responsible for ensuring that all of the Housing Options & Advice Team's procedures, including those relating to Temporary Accommodation, are fit for purpose and in line with legislation, case law and government guidance.</p> <p>During the testing of control effectiveness, discrepancies were identified in the implementation of the controls, especially regarding the types of identification which are appropriate and the purpose of obtaining photographs of</p>	Medium	<p>Procedure notes should be created for all areas and going forward processes put in place to ensure these are reviewed and updated regularly to reflect changes in legislation and clarify the procedures to be undertaken.</p> <p>We understand officers have already contacted other local authorities and obtained a copy of their policies and procedures which will be adapted to reflect the Council's processes. A suite of new policies and procedures are now being developed for the procurement and allocation of Temporary Accommodation, including move-on arrangements.</p>	Open	Phil Harris	30/06/2017	TBA

Housing options-2	<p>The department has developed an action plan identifying areas of the current processes and procedures which require improvement. Whilst some of these have appropriate actions in place a number of these future plans have stalled which is preventing improvements to the department being implemented. This is relevant to the following areas:</p> <ul style="list-style-type: none"> •The department would like to redesign the existing paperwork to make the process more efficient and reduce the repetitive and irrelevant information currently obtained; however, we understand that this has not been possible due to the increased demand for the service and the fact that Senior Officers have needed to spend time supporting frontline staff; •Given the significant increase in demand for Temporary Accommodation the department would like to source additional properties through Northampton Partnership Homes, a Private Sector Leasing Scheme and a Social Letting Agency. As an Arms Length Management Organisation of the Council, NPH actions should be taken to co-ordinate a consistent strategy and action plan for increasing the supply of lower cost Temporary Accommodation. Additional staff support is required to establish the PSL and SLA schemes; and •Whilst a 2017/18 budget has been developed this is on a very high level and not sufficiently detailed enough or reflecting the current level of overspend owing to increased demand for Temporary Accommodation. A number of these actions would improve the efficiency of the service and reduce costs incurred by the Council. In January 2017, the Council's Cabinet approved a comprehensive, fully costed business case for the 	Medium	<p>The Head of Housing & Wellbeing and the Housing Options & Advice Manager have been asking Northampton Partnership Homes, for the past 18 months, to increase the number of council homes used as Temporary Accommodation. However, despite it being a financial imperative for the Council, only 15 additional properties have been made available since October 2015. Northampton Partnership Homes has indicated that it would like to make changes to the current Temporary Accommodation arrangements and is in the process of drafting a proposal for the Council to consider.</p> <p>Monitoring will continue in order to assess the year end outturn and, given the current level of demand, the cost pressures on the 2017/18 budget.</p> <p>A review of the proposed future developments will be undertaken and an agreement in terms of direction and investment established by management in order to identify and implement service improvements that will remove inefficiencies, build the capacity of the Housing Options & Advice Team and ensure that the Housing Options & Advice Team is equipped to undertake effective casework, prevent homelessness and reduce the number of homeless households living in Temporary Accommodation.</p>	Open	Phil Harris	31/03/2018	TBA
Housing options-3	<p>The testing of a sample of 25 Temporary Accommodation applications (split between Council stock, B&Bs and County Chambers) identified a number of issues, including:</p> <ul style="list-style-type: none"> •2 applications had no evidence to demonstrate a proof of income had taken place; •10 applications had not recorded a unique reference to support effective reporting and retention of information; •10 applications had not recorded the number of bedrooms required; however a retrospective review of this determined that the appropriate sized accommodation had been provided based on family circumstances; and •Whilst all 25 applications were signed as reviewed and approved by a senior officer it is not possible to determine who has signed the documents and whether this is 	Low	<p>It is intended that, as the service migrates towards a paper-light way of working over the coming financial year –with the support of new software –new procedures will be developed and implemented.</p> <p>In the meantime, when approving Temporary Accommodation placements, all Senior Officers must now sign and print their name, and record the date of authorisation. In addition, the number of bedrooms that each household requires will also be added to the Temporary Accommodation records.</p> <p>Staff have already been reminded of the importance of fully completing the prescribed paperwork and ensuring this is complete to demonstrate a full record of actions taken by the Housing Options & Advice Team.</p>	Open	Phil Harris	31/03/2018	TBA

Housing options-4	<p>There is monthly performance monitoring performed around a number of key performance indicators produced on a monthly basis. However, a report was produced which summarised the Temporary Accommodation utilisation figures over the last 12 months which management found to be a helpful summary. This report was produced as a one off report as part of the establishment of a Social Letting Agency. It would be beneficial to produce this report on a regular basis and include as part of the monthly monitoring and reporting which is currently provided to management and could be used to support the case with Northampton Partnership Homes for an increase in the provision of Temporary Accommodation.</p> <p>Although the Council has access to all other local</p>	Low	<p>1. Management will review the performance information that is currently being monitored and consider the methods and content of future reports, including annual usage and benchmarking information against other local authorities.</p> <p>2. Management will carry out a benchmarking exercise with other local authorities that experience a similar level of demand as Northampton.</p>	Open	Phil Harris	31/12/2017	TBA
Housing options-5	<p>When determining the most appropriate Temporary Accommodation for an applicant there is a hierarchy based on price and value for money where by applicants will be placed firstly in Council stock properties and in B&B's as a last resort, depending on availability. There is currently no evidence retained to demonstrate that this process has been adhered to and staff are ensuring the most cost effective accommodations is sought in the first instance. Households living in Temporary Accommodation , particularly those who have been accepted as being owed a rehousing duty, are required to bid for accommodation on Northampton's Housing Register in order to minimise</p>	Low	<p>The Council's documentation will be updated to include a section where staff clarify that the cheapest BB is being used.</p> <p>The Council will update documentation on the TA spreadsheet with details on when applicants last bid or when Officers last chased.</p>	Open	Phil Harris	30/04/2017	TBA
Housing options-6	<p>Where Temporary Accommodation is provided to applicants in the form of B&B / hotels, the Council is sometimes left with no option but to place households in accommodation that it does not normally use, using a credit card. These placements are not set up on the Council's systems, meaning that no housing benefit is claimed and the Housing Options & Advice Service is left to bear the full cost of providing the accommodation. Of the testing performed, 1 of the 25 samples was paid via credit card with no housing benefit claimed.</p>	Low	<p>The Council is already seeking to establish invoicing arrangements with more B&B's and to set them up on the housing IT systems, ensuring that housing benefit can be claimed and the financial burden on the Housing Options & Advice Service is reduced when this type of accommodation is procured.</p>	Open	Phil Harris	30/06/2017	TBA

HR Recruitment	<p>The Council appoints interim staff as follows:</p> <ul style="list-style-type: none"> •Guidant is the Council's dedicated recruitment agency and should be used for all temporary or interim staff. Guidant will perform checks against IR35 legislation to determine if it applies •Where Guidant is unable to fulfil a position, often because it is a specialist or senior management role, the Council's procurement exemption route is followed. The exemption forms consider whether IR35 legislation applies. <p>Under the new IR35 legislation a worker is involved in off-payroll working when they work for a client through their own intermediary, often a personal service company (PSC), but would be an employee if they were providing their services directly. The off-payroll working rules ensure that where an individual would have been an employee if they were providing their services directly, they pay broadly the same tax and NICs as an employee.</p> <p>The Council initially assesses IR35 compliance at the start of an individual's employment, but there is no formal mechanism in place for continuing to assess whether its interim staff fall under this legislation should circumstances change. At present the Council has one employee who falls under the IR35 legislation.</p>	Low	A formal process should be developed to ensure that there are regular checks undertaken to ensure compliance with the IR 35 tax legislation requirements and adequate evidence retained to demonstrate this process.	Open	Karen Marriott, Karen Middleton	31/01/2018	The governance team are currently reviewing the process around interims and the policy and procedures are in draft stage. .
HR Recruitment	<p>Where a specialist or director level employee is required on a temporary basis and this is unable to be fulfilled by Guidant, the recruitment is made through the exemption process, and the relevant officer has to complete an exemption report. There is a section considering financial and resource implications which requires approval by legal before the whole form is approved by the Monitoring Officer or Section 151 Officer.</p> <p>There have been two employees employed using this route in the year. From the testing performed one of the exemption forms was approved retrospectively by the Legal Contracts & Procurement Advisor.</p>	Low	A secondary person will be nominated to review and approve the financial and resource implications as part of the exemption process regarding interims. This will ensure that there is adequate challenge and oversight before someone is appointed. The named responsible officer is Jackie Buckler	Open	Francis Fernandes	31/01/2018	Further work with the Borough Secretary is required to include guidance on exemptions.

HR Recruitment	<p>The HR team have developed a process map to set out and formalise the process to be followed when new people are recruited. However, the process map is complicated and difficult to follow. A simplified process map or procedure notes could be developed to ensure that new team members are able to follow the process and ensure that all required steps and required controls are implemented and adhered to.</p> <p>There is no formal HR strategy regarding the recruitment</p>	Low	The HR strategy will be developed to complement the Council's overall strategy to ensure that its resource allocation and recruitment of staff is aligned with the future Council developments. A simplified process map or procedure notes could be developed to ensure that new team members are able to follow the process and ensure that all required steps and required controls are implemented and adhered to.	Open	Karen Marriott	30/04/2018	The strategy will be completed once policies and procedures have been finalised.
HR Recruitment	<p>The Council currently has 12 staff covering vacant posts on a temporary basis. Our sample of 9 individuals identified that in 6 cases the job was not currently being advertised externally to recruit on a permanent basis. There does not appear to be any control in place to ensure that advertisement of full time roles to replace interim positions is done on a timely basis.</p> <p>In two instances the market rate of the jobs is significantly</p>	Medium	Where interims are used to cover for vacant posts a process should be developed to ensure that permanent roles are advertised on a timely basis to minimise the use of interim staff.	Open	Karen Marriott	30/04/2018	The governance team are currently reviewing the process around interims and procedures are in draft stage. Further work with the Borough Secretary is required to include guidance on exemptions.