

# Agenda Item 11

**Audit and Governance Committee**

**18<sup>th</sup> March 2010**

**TC**



**Corporate Governance activity report for the period 1<sup>st</sup> January 2010 to 31<sup>st</sup> March 2010, including:**

- **Corporate Risk Management – CRMG Chairman’s Progress Report**
- **Corporate Governance Work Plan, incorporating the progress on NFI and other Counter Fraud Initiatives, and**
- **Annual Governance Statement Action Plan (Progress Reports from Heads of Service and Directors)**

## **Summary**

The report and appendices outline the work undertaken to ensure the Council’s corporate governance arrangements are effective and in compliance with its local Code of Corporate Governance.

## **Recommendations**

### **1 Members are asked to note:**

- The Progress Report from the Chair of the Corporate Risk Management Group
- The Minutes of the last Corporate Risk Management Group dated 9<sup>th</sup> February 2010
- The Corporate Governance Work Plan for 2009/10

### **2 Members are asked to monitor and keep under review the:**

- Counter Fraud Initiatives including the NFI exercise and the improvements to the Council’s Counter Fraud Arrangements generally, including the new on-line Fraud Report form
- Annual Governance Statement - Action Plan

### **3 That this Council adopt the revised Corporate Risk Register and that it requires Elected Members and Officers regularly to monitor and review risk and mitigation of risk as it applies to the corporate and operational responsibilities of the Council.**

#### **a) Reasons for Recommendation**

In order that the status and role of Corporate Governance can be confirmed at Member level and to ensure that progress is being made on the Governance plans in line with Member expectations.

#### **b) Alternative Options**

None

**c) Risk Considerations**

- Failure to comply with our own Local Code of Corporate Governance
- Failure to comply with the Corporate Governance 'Key Lines of Enquiry'
- Failure to maintain our Use of Resources score
- Failure to maintain our current CAA rating
- Failure to progress the actions within the Annual Governance Statement
- Criticism from External Audit and other external review agencies

**d) Policy and Budgetary Considerations**

There are no budgetary considerations

**e) Date for Review of Decision**

N/a

**Main Body of the Report**

**Introduction**

This report shows the activity for the period January 2010 to March 2010.

**Corporate Risk Management – CRMG Chairman's Progress Report**

The CRMG is a member/officer group chaired by an elected councillor and includes the Corporate Director and the Corporate Risk Manager.

The Chairman will provide a verbal update to the Committee on the discussions he has had with the corporate director (DP) and the Head of ICT. He will emphasise the need for access to the risk register by all Members and of the need to be able to access the CRR (actual system) from the Members' Area.

The Chairman will also outline the future role of the CRMG which has been agreed as:

- Performing a monitoring and review role, adopting a 'rolling programme' of reviews over successive months.
- The monitoring and review role will include a 'service by service' review of 'risks', 'mitigating control actions' and 'pure/residual risk scores', 'risk review dates' and the risk scores (both pure risk – the risk rating before any controls are added and the residual risk – the risk rating after controls are added).
- To include a review of the factual content of the CRR text fields to ensure that they properly and accurately detail risks and that the mitigating control actions are both sensible and robust.
- Should Members feel it appropriate, the relevant head of service or director will be asked to attend future CRMG meetings to discuss their risks, mitigating control actions and/or risk scores.  
The CRMG will flag up any significant issues to the relevant Scrutiny Committee as it sees fit.

The Chairman will advise on the role of the various Scrutiny Committees in that they should take account of the CRR when reviewing services.

The CRMG has proposed that this Council adopt the revised Corporate Risk Register and that it requires Elected Members and Officers regularly to monitor and review risk and mitigation of risk as it applies to the corporate and operational responsibilities of the Council.

The Minutes of the meeting of the Corporate Risk Management Group dated 9<sup>th</sup> February 2010 are attached to this Agenda.

## **Corporate Governance Work Plan 2009/10 – Appendix 1A**

Please refer to the appendix, a brief summary of the work completed so far this year is detailed below:

### **NFI Exercise 2009/10**

This exercise concentrates on data from 2008/09 and is co-ordinated by the Internal Audit & Governance Manager who prepares and sends raw data to the audit commission, monitors completion of the work, giving guidance where necessary, supplies login and password details to responsible officers and ensures the on-line database is adequately completed with all relevant details.

I have reported previously that the NFI (creditors reports) highlighted a couple of anomalies (a duplicate payment and a sundry debtor overpayment). These have been dealt with satisfactorily.

The exercise is complete in Housing Benefits and total fraud found this year is £1,196.05 relating to 1 housing benefit claimant.

A table detailing the work completed by the Council is attached at Appendix 1B. This table doubles as a monitoring document and highlights the potential fraud areas (column 2) and also gives the total records investigated (final column).

Data has now been sent relating to 2009/10, specifically relating to housing rents and council tax, other data will be requested during 2010. The NFI is continually being expanded and there are plans to include registered social landlords in the near future to reveal housing tenancy fraud.

### **Other Counter Fraud Initiatives – Agenda Item 13**

Giving assurance on the Council's counter/anti-fraud arrangements falls within the remit of Audit & Governance. There are various tools available for the Council to assess its current counter fraud arrangements and work has taken place during 2009/10 to firstly identify where improvements could be made and secondly to recommend actions for implementation.

A report entitled Counter Fraud Arrangements at East Devon District Council has been written after extensive research into our current counter fraud arrangements. The recommendations contained within the report have been taken from various sources, including the Audit Commission's "Protecting the Public Purse – Guide to Best Practice", CIPFA BGF Red Book 2 – Managing the risk of fraud and the Fraud Advisory Panel. Account has also been taken of the Head of Housing's Report to the Housing Review Board.

The Report is available at Item 13, the main areas of concern were:

### **Housing Needs**

There are good opportunities to improve our counter fraud arrangements, I recommended:

- A database of tenant photographs. (Endorsed by the Head of Housing in his report)
- Updating our evidence capturing procedures to bring into line with other authorities
- Revise and extend the use of "Experian"
- Improve verification of evidence offered by applicant
- Utilise staff employed in other sections of the Council to verify tenants occupying council houses

### **Finance**

There are some opportunities to improve our counter fraud arrangements, I recommended:

- Telephone canvassing – out of hours
- Revised system of checks/confirmation on rural, charitable and other rate relief
- Raise awareness by using the local press

## **HR**

There are good opportunities to improve our counter fraud arrangements, I recommended

- Employment screening – residential address
- Verification of degree or professional qualifications
- Verification of work history and references
- Clarity over 'HR' responsibilities 'v' 'Management' responsibilities
- Improved verification of prospective employees criminal history
- Additional checks by IA to include compliance with the Employment Screening Policy

## **Counter Fraud – General Improvements**

I recommended:

- Additional 'intra EDDC' data matching exercise (outside of the NFI exercise)
- Raising Awareness by way of focussed team meetings on 'ethical governance' bringing the policies to life for members of staff and reviewing our current ethical policies.
- Joint training sessions (Internal Audit / Housing Benefit Fraud)
- Upgrading our Fraud Reporting Facilities to include confidential fraudline and an on-line Fraud Report Form – copy for reference at Appendix 1C.

## **Annual Governance Statement – Action Plan, Progress Report**

The Internal Audit & Governance Manager is pleased to report comments from Head of Service and Directors for each item in the Action Plan.

## **Legal Implications**

None

## **Financial Implications**

None

## **Consultation on Reports to the Executive**

N/A

## **Background Papers**

"Protecting the Public Purse – Guide to Best Practice"  
CIPFA BGF Red Book 2 – Managing the risk of fraud  
Fraud Advisory Panel.

Tanith Cox - 2687  
Audit & Governance Committee  
Internal Audit and Governance

18<sup>th</sup> March 2010

Date: 9<sup>th</sup> February 2010  
Contact Number: 01395 517487  
E-mail: tcox@eastdevon.gov.uk  
Our Reference:  
Your Reference:



To: Members of the Corporate Risk Management Group  
(Councillors: Peter Bowden, Ray Bloxham, Ken Potter, Tim Wood)

Internal Audit & Governance Manager

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Diccon Pearse - Corporate Director

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## **EAST DEVON DISTRICT COUNCIL**

### **Notes of a Meeting of the Corporate Risk Management Group held at Knowle, Sidmouth on 9<sup>th</sup> February 2010**

**Present:** Councillors:  
Peter Bowden (Chairman)  
Ray Bloxham  
Ken Potter  
Tim Wood

**Officers Present:** Tanith Cox – Internal Audit and Governance Manager

**Apologies:** Diccon Pearse – Corporate Director

The meeting started at 11.30 am and ended at 12.35 pm

1 **Minutes of Previous Meeting**

The minutes of the meeting of the Corporate Risk Management Group held on 1<sup>st</sup> December 2009 were confirmed as a true record.

2 **Update from Chairman following is meeting with Corporate Director and Head of ICT on 20<sup>th</sup> January 2010**

The Chairman updated the Group on the discussions he has had with the corporate director (DP) and the Head of ICT. He said he had emphasised the need for access to the risk register by all Members and of the need to be able to access the CRR (actual system) from the Members' Area. The Chairman went on to say that although he logged into the system using the special user ID and password set up for him the system was not available. He acknowledged that there was clearly more work to be done in this area.

The Chairman did say however, that a few Members do have dongles which will allow them to gain access to the system from their home pc's and that the Corporate Risk Manager (TC) would be happy to provide any support they need including specific reports.

Discussion ensued around how far the Council had progressed since last year.

**RESOLVED:** that the members page is user friendly and a potential source of easily accessible information for members.

### 3 **Resolution for adoption of the CRM arrangements by the full Council**

Discussion ensued around the wording of the 'Resolution' which would need to be proposed, seconded and supported by 3 Members. It was realised that the CRMG itself only contained four Members and that another Member would need to be asked to support the Resolution. RB suggested another Member be asked to add their support and this was agreed by the Group.

The final Resolution is to read:

That this Council adopt the revised Corporate Risk Register and that it requires Elected Members and Officers to regularly monitor and review risk and mitigation of risk as it applies to the corporate and operational responsibilities of the Council.

TC is to email the resolution to all CRMG Members and ask them to add their support (in terms of proposer/seconder/supporter) and email from their own pcs directly to the Democratic Services Manager (DV).

The Chairman was keen that a set of slides be made available for him to use when presenting the CRR to Full Council and TC agreed to produce a set of 5 slides for his use. The slides will make reference to the Members' Guides already produced and also set out in detail the continuing work programme of the CRMG and the role of the Scrutiny Committees.

**RESOLVED:** That the resolution as set out above will be presented to the to Full Council by the Chairman.

### 4 **Future Role(s) of CRMG**

Much discussion ensued around the future role of the CRMG and it was agreed that:

- The CRMG will perform a monitoring and review role, adopting a 'rolling programme' of reviews over successive months.
- A 'service by service' review of 'risks', 'mitigating control actions' and 'pure/residual risk scores' will take place at future meetings.
- The CRMG will review the factual content of the CRR text fields to ensure that it properly and accurately details risks and that the mitigating control actions are both sensible and robust.
- The CRMG will review the 'risk review dates' to ensure that a review of the CRR has taken place by the Council.
- The CRMG will also consider the risk scores (both pure risk – the risk rating before any controls are added and the residual risk – the risk rating after controls are added).
- Should Members feel it appropriate, the relevant head of service or director will be asked to attend a future meeting to discuss their risks, mitigating control actions and/or risk scores.
- The CRMG will flag up any significant issues to the relevant Scrutiny Committee as it sees fit

There was also discussion around the role of the four Scrutiny Committees and it was agreed that:

- The CRR is a valuable resource for the Council's scrutiny committees and Scrutiny Committee Chairmen should take account of the CRR when reviewing services.

There was also discussion around the role of the Audit & Governance Committee and it was agreed that:

- The Audit & Governance Committee should continue to receive the Executive Summaries of service audits performed by Internal Audit and that these should also be copied to the CRMG where there are issues relating to the CRR.

RB made reference to the Terms of Reference drawn up by the Group in its first meeting which had subsequently been agreed by Full Council and which makes reference to the specific reviewing and monitoring function of the Group.

The frequency of group meetings were discussed and debate ensued around whether the Group should meet on a monthly basis. A decision on frequency of meeting can be made once an initial trial run of CRR monitoring had been completed.

**RESOLVED:** That the functions and programme of reviews will take place as specified.

That the Group will have a trial run in March in order to gauge how long each review will take.

The Internal Audit & Governance Manager will select a sample of services to review.

5 **AOB**

There was no other business.

6 **Date of next meeting**

The next meeting of the CRMG will be in March.

**RESOLVED:** that the next meeting of the Corporate Risk Management Group be held on 5<sup>th</sup> March 2010. The Audit & Governance Manager will inform the Democratic Services Manager to ensure this is featured in the Knowledge.

**CORPORATE GOVERNANCE WORK PLAN 2009/10**

**Appendix 1A**

<b>Month</b>		Update Audit and Governance Policies, Strategies, Procedures, Codes of Practice, Explanatory Leaflets etc		Partnership Mapping and partnership corporate governance arrangements (but see note on reverse) <sup>4</sup>	Annual Governance Statement 2008/09 <sup>5</sup>	Key Lines of Enquiry 2008/09 - Use of Resources KLoEs and Corporate Governance KLoEs <sup>6</sup>	Corporate Risk Management - System Procurement and implementation, data transfer and cleansing	Data Quality Initiatives – BVPI and NI checking <sup>8</sup>	Ongoing Management of staff resources, workloads and plans of the Internal Audit Section <sup>10</sup>
<b>2009</b>									
April			NFI <sup>3</sup>						
May	A & G & CRMG Committee Reports <sup>1</sup>								
June		Ongoing throughout the year. <sup>2</sup>							
July									
August	A & G & CRMG Committee Reports <sup>1</sup>				Review of AGS Action Plan and prepare for A & G Committee		CRM System Administration and System Review.		
September							Preparing reports for staff, members, CRMG and A & G Committee when requested. <sup>7</sup>	Audit & Governance Training for council staff and members <sup>9</sup>	
October									
November	A & G & CRMG Committee Reports <sup>1</sup>								
December									
<b>2010</b>									
January	A & G Committee Reports <sup>1</sup>								
February	A & G & CRMG Committee Reports <sup>1</sup>				Annual Governance Statement 2009/10 <sup>5</sup>				
March									

Completed
  On going
  delayed

## Notes to the Corporate Governance Plan

<sup>1</sup> Audit & Governance Committee – this Committee meets 5 times, it is supplemented by an Audit & Governance Committee Agenda, which prompts for different reports from the various officers (both internal and external) who report to it. The Committee requires regular updates on progress of internal audit and corporate governance work together with action plans relating to the Annual Governance Statement, Key Audit Findings and Risks and Computer Audit Monitoring. The Corporate Risk Management Group meets quarterly and is supplemented by a Committee Agenda which prompts for different reports relating to CRM.

<sup>2</sup> Policies, procedures and Codes – the IA and Governance section take responsibility for many financial and ethical policies and codes, these need to be reviewed on an annual basis and updated where applicable. Policies include the Code of Corporate Governance, Anti-Fraud, Theft and Corruption Policy, Disposal Policy, Guide to Corporate Risk Management, Guide to Internal Audit and the Audit Charter.

<sup>3</sup> NFI – National Fraud Initiative, the Audit & Governance Manager is the key contact and co-ordinating officer and deals with incoming and outgoing queries, investigates cases of potential fraud relating to council staff, co-ordinates investigations by other sections and/or directorates and ensures the Audit Commission's database is updated by nationally agreed deadlines.

<sup>4</sup> Partnership Mapping – The council's partnerships are required to be mapped and assessed to establish whether or not they include adequate corporate governance arrangements, a risk assessment is also undertaken and an action plan detailing recommendations is produced. This work is essential criteria under our Use of Resources assessments. Until the resource issue within the section is resolved it is not possible to be clear about target or completion dates.

<sup>5</sup> Annual Governance Statement - Accompanies the council's financial statements and is signed off by the Chief Executive and the Leader of the Council, reviewed by the External Auditors and complements the council's corporate governance arrangements. The Audit and Governance Committee keep the Governance Statement Action Plan under review.

<sup>6</sup> Key Lines of Enquiry 2008/09 - this includes the 'harder test' KLoEs under Use of Resources and the KLoEs relating to Corporate Governance. Both sets of KLoEs are required to be completed for the Annual Governance Statement (item 5 above). Key Lines of Enquiry are reviewed by the External Auditors and support the council's rating under CAA.

<sup>7</sup> Corporate Risk Management was re-launched within the council with the procurement and implementation of a new Corporate Risk Management System and a new work process whereby Heads of Service are responsible for updating the Corporate Risk Register. The Audit & Governance Manager is the council's key contact for Corporate Risk Management and works with members and staff to ensure the council's risks are identified and mitigated as far as possible. The Audit & Governance Manager will remain the systems administrator for the Risk Register.

<sup>8</sup> Co-ordinate the review of the council's National Indicators and prepare supplementary reports to council staff and members.

<sup>9</sup> Audit & Governance Training

<sup>10</sup> Ongoing Management of the Internal Audit Section – management of staff, systems, workloads, plans, procedures etc pertaining to the internal audit service.

## NFI WORK PROGRESS 2008/09 MATCHES

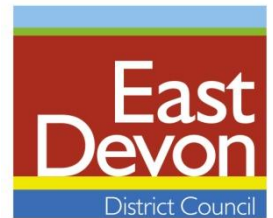
As at March 2010

Report No	Report Name	Investigating Officer	Progress	Notes
2	<b>Housing Benefit Claimants to Student Loans</b>	KL	✓	32 matches all completed
13	<b>Housing Benefit Claimants to Payroll</b>	KL/TC	✓	11 matches all completed
14	<b>Housing Benefit Claimants to Payroll</b>	KL/TC	✓	189 matches
14.1	<b>Housing Benefit Claimants to Payroll Pensions</b>	KL/TC	✓	628 matches
27	<b>Housing Benefit Claimants to Housing Benefit Claimants</b>	KL/TC	✓	12 matches
47.1	<b>Housing Benefit Claimants to Taxi Drivers</b>	KL/TC	✓	9 matches
47.2	<b>Housing Benefit Claimants to Taxi Drivers</b>	KL/TC	✓	5 matches
48.1	<b>Housing Benefit Claimants to Personal alcohol licences</b>	KL	✓	7 matches
65	<b>Payroll to Payroll</b>	TC	✓	6 matches
66	<b>Payroll to Payroll</b>	TC	✓	53 matches
701	<b>Duplicate creditors by creditor name</b>	GF	✓	312 matches
172.2	<b>Concessionary Travel Passes to Benefits Agency Deceased Persons</b>	TC	✓	8 Matches
180.1	<b>Insurance Claimants to Insurance Claimants</b>	TC	✓	6 Matches
180.2	<b>Insurance Claimants to Insurance Claimants</b>	TC	✓	1 match
702	<b>Duplicate creditors by address detail</b>	GF	✓	229 matches
703	<b>Duplicate creditors by bank account number</b>	GF	✓	62 matches
707	<b>Duplicate records by invoice reference, invoice amount and creditor reference</b>	GF	✓	54 matches

Report No	Report Name	Investigating Officer	Progress	Notes
708	<b>Duplicate records by invoice amount and creditor reference</b>	GF	✓	157 matches
709	<b>VAT overpaid</b>	GF	✓	12 matches

# REPORT OF SUSPECTED FRAUD, THEFT OR OTHER WRONGDOING

Appendix 1C



- ✓ If completing off-line, please use **black ink** and CAPITALS
- ✓ Where tick boxes appear please tick all those that apply

## Part 1 – Suspected person's details

Last Name [Click here to enter text.](#)

[First Name]

Address		
Postcode		
Gender	NINO	Date of birth/Approx Age
Height	Build	Dress (clothing) style
Hair Colour	Hair Style	Hair Length
Distinguishing features		
Description		

## Part 2 – Your details

If you wish to provide your details please do so below (you do not have to give your details but it may help if we can contact you if we require more information)

Full name	
Address	
Postcode	
Telephone number	Date of allegation

## Part 3 – Details of allegation

Type of allegation (note 1)

## Part 4 – Transport / Travel / Vehicle owner details

Mode of Transport	Leave from
Leave time	Return time
Colour	Registration No
Markings / Company Logo	Owner details

[http://www.eastdevon.gov.uk/fraud\\_report\\_form\\_distribution.pdf](http://www.eastdevon.gov.uk/fraud_report_form_distribution.pdf)

Part 5 – Employer details	
Employer	
Type	
Address	
Postcode	
Telephone number	Contact

Is employer collusion suspected? Yes  No

Part 6 – Details of others involved			
Last Name		First Name	
Address			
Postcode			
Gender	NINO	Date of birth/Approx Age	
Height	Build	Dress (clothing) style	
Hair Colour	Hair Style	Hair Length	
Distinguishing features			
Description			
Any known relationship			

Part 7 – Additional Information
Please give any further information

## ANNUAL GOVERNANCE STATEMENT – ACTION PLAN

For the year 1<sup>st</sup> April 2008 to 31<sup>st</sup> March 2009

### Governance and Control Issues Identified

Council Members and Officers have been continually updated and advised on the implications of reviews of the effectiveness of the Council's systems of internal control. Plans have been devised and put in place to ensure continuous improvement. The Council's annual review of the governance framework, including the system of internal controls and associated reviews during the year, identified some areas where action is appropriate to enhance the governance and internal control environment and ensure continuous improvement. These are listed below, along with the proposed actions to remedy or improve the position.

Area for Improvement	Suggested Action	Officer Resp.
<p>Disaster Recovery Plans and Business Continuity Planning is not adequate to protect the Council or its assets.</p>	<p>The Head of ICT has supplied an up-to-date position statement (as at 24/8/09)</p> <p>The DR process is still tenable for all the identified core systems. The tape recovery process has been used a number of times in the last 6 months to recover files that have been inadvertently erased and also to build a new Exchange server for email.</p> <p>With the increasing amount of data stored by the Council the back-up "window" had extended into live operation times and remedial action was taken to alter the back-up methods to compensate.</p> <p>Work began in July to completely redesign the DR and back-up systems to make everything faster, easier to use, and more reliable. This involves using the new links to Honiton Business Centre for data transfer and setting up equipment that more closely replicates the systems at the Knowle.</p> <p>This is now in process aiming for a test no later than March 2010.</p>	<p>CP</p> <p>Update awaited</p>
<p>The Council's Corporate Risk Management System is not up to date and does not adequately identify and manage corporate risk. The corporate risk register has not been formally updated and reported to the Audit &amp; Governance Committee since March 2008.</p>	<p>Good progress has been made in populating the new corporate risk register, the council's CRM Policy, Strategy and Toolkit have all been updated and the Council has offered refresher training to both Council staff and Council Members. The Corporate Risk Management Group is keeping the exercise focused and on track.</p>	<p>DP</p>

Area for Improvement	Suggested Action	Officer Resp.
<p>The Council's Internal Audit Service has suffered from a lack of resources and does not have adequate resources to monitor the governance arrangements of the council</p>	<p>The successful tenderers have now commenced work within Internal Audit and work is progressing well.</p>	<p>DP</p>
<p>There is a need to review Health and Safety compliance throughout Street Scene services.</p>	<p>The review of Health and Safety compliance has commenced and has been included in the service objectives and in PER's for this year.</p> <p>These duties were part of the Performance Officer post (now deleted) and existing staff have been tasked to find the capacity to move this forward at the expense of other works.</p> <p>The Health and Safety procedures document is developing well. Most of the various legislative requirements have been updated and the associated procedures will be implemented and current documentation updated. Some of the procedural documentation being carried out includes a review of Risk Assessments; COSHH (Control of Substances Hazardous to Health); and Depot Fire Procedures. This work will be built into the ongoing work-load of the department and will be on-going.</p>	<p>MR</p>
<p>Failure to develop Flood Alleviation and Coast Protection Strategy</p> <p>The Strategy links to both national and regional plans and would draw down funding for protection schemes. Due to lack of resources in Street Scene, (Engineering) the capacity of the staff to deal with these issues is limited.</p>	<p>The post of Principal Engineer is currently on hold pending the outcome of local government review and service transformation.</p> <p>This has serious work capacity issues in the delivery of Engineering services in particularly those associated with Land Drainage, Flood Alleviation and Coastal Defence works. Failure to fill this post will mean the work will need to be prioritised with some work areas not being carried out.</p> <p>The Head of Street Scene was asked for an update – his response was that the situation has not changed.</p>	<p>PJ</p>

Area for Improvement	Suggested Action	Officer Resp.
<p>LED Budgets – Planned Maintenance budgets affected by the shortfall in revenue received from LED (mismatch identified between work undertaken and amount of money received from LED – problem compounded as figures have been entered into the signed contract). Continuing to provide a service to LED will mean other maintenance work will remain outstanding.</p>	<p>Asset Management Forum will be reporting to the Asset Management Group to resolve some of the contractual issues on maintenance for LED .</p>	<p>KH/DB  Update awaited</p>
<p>A programme of data quality checking was carried out by Internal audit during 2009 which found most NIs were either incorrect or needed remedial action. The NIs requiring internal audit recommendations were NI 156 – Housing NI 182 – Environmental Health / Licensing NI 185a/b CO<sup>2</sup> Emissions NI 194a/b Air Quality NI 196 – Street Scene</p>	<p>Report produced by Internal Audit &amp; Governance and presented to the Audit &amp; Governance Committee on 29<sup>th</sup> September 2009, the Committee supported the recommendations made within the report to improve the quality of council data.</p>	<p>SMT</p>

Area for Improvement	Suggested Action	Officer Resp.
<p>An audit in 2007/08 highlighted the areas of weakness with regards the Council's Licensing functions, in that there are two which do not operate consistently or use the same computer system. Internal Audit recommended that the two Licensing functions be amalgamated, and this recommendation appeared on the 2008/09 Governance Action Plan but has not been implemented. The issues highlighted in the review of NI 182 are likely to have been exacerbated by the inconsistent methodologies and systems.</p>	<p>The transfer of licensing administration to the Licensing Service has now been completed other than in respect of those where it is considered appropriate to leave with the Environmental Health Service.</p> <p>Those to be retained are camp site licensing, caravan and camp site registration, approved food premises registration, houses in multiple occupancy, food premises notification, cooling tower notification and environmental permitting registration/authorisation.</p>	<p>SMT</p>