

Follow Up Audit Objective

To provide assurance that agreed actions to mitigate against risk exposure identified within the 2021/22 audit report have been implemented.

Appendix B
Follow Up Progress Summary

Priority	Complete	In Progress	Not Started	Summary
Priority 1	0	0	0	0
Priority 2	13	5	0	18
Priority 3	0	0	0	0
Total	12	6	0	18

Follow Up Assessment

The original audit of Street Scene Control Weaknesses was completed in October 2021. The original report identified weaknesses found during the special investigation that was undertaken.

The follow up audit has found the majority of actions have now been completed. Key findings from the audit follow up have been summarised below.

Key Findings


A Code of Conduct (COC) has been updated and approved by SLT in September 2022. This will be a mandatory part of training but at present the training has not been rolled out. The COC has had updates to reflect the observations from the special investigation and will be an essential document in improving the site.



There are a few actions still in progress including the use of council vehicles for private use, training and compliance with financial procedures. Steps have been taken to address these issues with some needing specific contractual intervention and sign off from the Full Council. Overall, these steps are on track to be completed soon and have shown the teams dedication to improving the working environment and clarity of acceptable behaviour.



There are several areas of good practices now being observed at the site with noticeable improvements. Under the direction of a new Environmental Services Manager the culture has seen a marked improvement, which has been confirmed by employees. Many new processes and improvements are in place and there appears to be an overall strong team ethic to push the final few changes across the line.

Summary

Testing has been performed in relation to all priority 1 and 2 actions and supporting evidence obtained to support implementation of actions. Reference **Appendix A** for details of all actions.

The majority of the actions agreed have been completed or are making progress to completion. Some key documents are being updated and were approved at the 3rd November 2022 Senior Leadership Team meeting these should be rolled out within the next few weeks. The team are working hard to close gaps in policies and knowledge to provide a safe, inclusive and respectful environment. With some new leaders in place and more inclusion of Union reps the site appears more organised and positive.

Appendix 1

Agreed Actions & Follow Up Assessment

Agreed Action – 1.1 Leave Records		Follow Up Assessment			Complete	
<p>All leave is booked and approved through i-Trent, as a single record. Training, support and relevant technology should be provided to staff to ensure they are clear on expectations and are comfortable in using the system.</p> <p>Consideration should be given to revisiting the amount of leave taken by staff in the current period through reconciliation between the records. Any adjustments to leave should then be made in line with the allocation stated in the employee's contract of employment.</p>		<p>All staff now book their leave through the i-Trent system only. Through system analysis four individuals were noted as not being present on the I-Trent system, it has been confirmed by management that these individuals are new starters and their access to i-Trent is being undertaken.</p> <p>There were no anomalies found in the amount of leave that staff are now taking. Past records were update by the council People Specialist with the input of each individual staff member. No further concerns raised as part of this process.</p>				
Priority	2	SWAP Ref: 47063	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 2.1 Vehicle Records and Tracking		Follow Up Assessment			Complete	
<p>The process for vehicle checks and key sign-out should be enforced more strongly at Lufton. This should apply to all fleet vehicles so that there is adequate audit trail on driver history in the event of issues arising.</p>		<p>The site currently uses a weekly check sheet which is retained in each vehicle and then filed when complete. This is in process of being converted to a triplicate version booklet check form for each vehicle. This will be completed daily with one copy remaining in the vehicle with the others being filed. All books have sequential numbers thus making them easier to monitor.</p> <p>A new fob system is in place in a new key cabinet, where drivers are allocated one fob which is inserted into a key safe in order to release one set of keys. The drivers personal fob is not returned until the keys are returned so a driver can only access one vehicle at a time.</p> <p>A driver handbook drafted in September 2022 reminds staff that they must not share key fobs at any time, this document was approved by SLT on 3rd November 2022 and is due for rollout to staff imminently.</p>				
Priority	2	SWAP Ref: 47065	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 2.2 Vehicle Records and Tracking		Follow Up Assessment			Complete	
<p>Vehicle tracking should be consistently applied across the department to ensure good tone is set from the top at Lufton and to ensure that there is adequate audit trail on driver history in the event of issues arising.</p>		<p>All vehicles used on public highways are now fitted with tracking devices, however, there are two separate systems (Webfleet and Pemco) which provide different levels of monitoring. There is no tracking of tractors, mules and mowers which are considered plant. Tracking of plant equipment is being considered by SSDC. All staff are notified that vehicles are being tracked and a screen displays the tracking in the office.</p> <p>A new vehicle tracking policy was approval by SLT on 3rd November 2022 outlining that all staff must sign a statement of understanding regarding vehicle tracking.</p>				
Priority	2	SWAP Ref: 47066	Responsible Officer	N/A	Timescale	N/A

Agreed Action - 2.3 Vehicle Records and Tracking			Follow Up Assessment		Complete	
<p>Vehicle tracking information should be reviewed by a designated resource at an agreed interval. Journeys that fall outside of normal working parameters should be brought to the attention of a senior manager and further enquiries then made.</p> <p>Any breaches to working practices in relation to vehicle use, including unauthorised journeys and corrected odometers should be reported to the Director for Strategy and Support immediately.</p>			<p>Tracking devices on all vehicles used on public highways can provide an overview to those in the office via a screen. When infringements occur (i.e. speeding) an automatic email notification is sent to the office for them to investigate. In these instances, they will speak to the individual in question to understand why the issue occurred.</p> <p>This system is now monitored by the site themselves, but reports are not run as automatic emails notify the team of any issues.</p>			
Priority	2	<i>SWAP Ref: 47067</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 3.1 Use of Council Vehicles for Private Use			Follow Up Assessment		In Progress	
<p>The Council should agree on a policy for taking work vehicles home overnight. Consideration should be given to the perceived advantages to the Council, any insurance implications and the responsibility for the safety of staff.</p>			<p>Personal use of council vehicles has now ceased. However, some vehicles are still being taken home overnight as it is specified in the contracts of 12 individuals. A draft policy is to be presented to the Senior Leadership Team regarding proposed changes to this arrangement as it will present tax implications for employees and the council. From this consultation discussion will be required with employees and unions before a resolution can be confirmed.</p>			
Priority	2	<i>SWAP Ref: 47069</i>	Responsible Officer	Environmental Services Manager	Timescale	31/03/23
Agreed Action - 3.2 Use of Council Vehicles for Private Use			Follow Up Assessment		Complete	
<p>Vehicles should not be used for private use during and outside of working hours. This should be reiterated to all staff and where breaches occur, these should be reported to the Director for Strategy and Support immediately.</p>			<p>All managers confirmed personal use of council vehicles has ceased. All employees have been made aware that vehicles are tracked, monitored and should not be used for personal reasons. This is also part of the induction for new employees.</p> <p>A newly approved drivers handbook also refers to the use of council vehicles for personal use as prohibited.</p>			
Priority	2	<i>SWAP Ref: 47070</i>	Responsible Officer	N/A	Timescale	N/A

Agreed Action – 4.1 Use of Council funds for personal purchases			Follow Up Assessment		Complete	
<p>Employees at Lufton should be reminded that only goods and services that are a valid liability of the Council should be purchased through Council methods of payment and Council trade accounts.</p> <p>Noncompliance with the above should be reported to the Director for Strategy and Support immediately.</p>			<p>Purchase cards are still in use but all staff are informed of the rules around purchases. Training is provided and must be completed before an employee has access to a purchase card. Acknowledgement of purchase card forms were viewed and complete.</p> <p>Staff must ask before they use their card, this is normally carried out verbally and discussions are had on reusing and utilising current equipment, before purchasing anything new.</p>			
Priority	2	<i>SWAP Ref: 47071</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action 5.1 Using Council Owned or Hired Items or Services for Non-Council work			Follow Up Assessment		Complete	
<p>Staff should be reminded that property of the Council or hired equipment is not to be removed or used without prior approval from the Director for Strategy and Support. Communications or a written policy for staff guidance may be beneficial. Breaches should be reported immediately to the Director for Strategy and Support.</p>			<p>All current employees have been made aware that council owned or leased equipment is not to be removed or used without prior approval. This is on the employee induction for new starters.</p> <p>Periodic reminders are given to employees at toolbox talks. Staff has signed a declaration to confirm they have been informed that no equipment is to be removed or used without prior approval.</p>			
Priority	2	<i>SWAP Ref: 47072</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 6.1 Sale of Council Items			Follow Up Assessment		Complete	
<p>It should be ensured that Financial Regulations are complied with regarding disposals. This should include, where necessary, documented rationale, i.e., value for money and evidence of discussion with the Procurement and Risk Manager.</p>			<p>Any equipment or plant that is no longer required is sent to a local auction house with receipts and records viewable on request.</p> <p>Council central finance are involved in the documenting of the sales and funds. The current process meets financial procedure rules.</p>			
Priority	2	<i>SWAP Ref: 47073</i>	Responsible Officer	N/A	Timescale	N/A

Agreed Action – 7.1 Declaration of Personal Relationships			Follow Up Assessment		Complete	
Staff should be reminded to declare any personal relationships and these should be routinely assessed by a relevant manager who can consider the relationship for operational and reporting purposes.			Existing staff had to confirm if they had any personal relationships to other Council employees and applications for employment include a request to declare any relation or relationship with current members of staff. It was confirmed that there are employees who do have personal relationships to their colleagues, however, none of these personal relationships involve any direct work relationships or line management responsibilities.			
Priority	2	<i>SWAP Ref:</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 8.1 Declaration of Gifts and Hospitality			Follow Up Assessment		In Progress	
Staff should be reminded on the rules around declaration of gifts and hospitality and provided with the necessary training and access to do so.			An extract from the SSDC gifts and hospitality register was reviewed for 2020-2022 with nothing declared for the depot team in this time period. The need to declare gifts and hospitality is included in the current code of conduct all staff should have read when joining the Council. Training on the Code of Conduct will include gifts and hospitality, but the training has not yet been rolled out.			
Priority	2	<i>SWAP Ref:</i>	Responsible Officer	Environmental Services Manager	Timescale	31/03/23
Agreed Action – 9.1 Private Works Outside of SSDC			Follow Up Assessment		Complete	
The Council should decide on a stance regarding private works. Should these be allowed to continue, they must be declared and approved, where necessary by the Director for Strategy and Support, and not conflict with working arrangements or be done using work equipment, plant or vehicles. Employment contracts will also need to be reviewed and amended in line with the agreed approach.			No private work is currently being undertaken by the team. Any requests for private work are being forwarded to the Environmental Services Manager to be declined.			
Priority	2	<i>SWAP Ref:</i>	Responsible Officer	N/A	Timescale	N/A

Agreed Action – 10.1 Recruitment Processes			Follow Up Assessment		Complete	
The Council should review the arrangement with the agency and consider its own Fair Recruitment Policy in this. Future posts should be filled using the correct process to ensure fairness and to avoid accusation and risk of favouritism.			Agency workforce are now only utilised for casual posts where appropriate. There is no longer any direct recruitment from the agency. There is a more open process for recruitment with Unions reps having a clear presence at the site and SSDC Managers from other departments involved in recruitment to ensure fairness. The SSDC People Manager confirmed that the sites recruitment process is now in line with SSDC.			
Priority	2	<i>SWAP Ref: 47074</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 11.1 Access to Personnel Files			Follow Up Assessment		Complete	
A data cleansing exercise should be undertaken on the shared and local drives to remove any personnel files which would, if found, constitute a breach of Data Protection Regulations.			It has been confirmed that paper copies of personnel records have now been removed from the site. The current SSDC People Manager confirmed that all team leaders and operational leads were instructed to remove any personnel files from shared drives and stored in a secure location. This was reviewed by a People Manager to ensure this had been complied with.			
Priority	2	<i>SWAP Ref: 47075</i>	Responsible Officer	N/A	Timescale	N/A
Agreed Action – 12.1 Compliance with the Employee Code of Conduct and Financial Procedure Rules.			Follow Up Assessment		In Progress	
All staff should be reminded of their individual responsibility to comply with the employee Code of Conduct and the Financial Procedure Rules. Training should also be provided to all staff on both.			The Employee Code of Conduct is a mandatory part of training. This has been updated and was approved by SLT in September 2022. Training will be delivered to all employees, but this has not yet been rolled out. Finance training was provided to employees in line with SSDC's Financial Procedure rules in December 2021.			
Priority	2	<i>SWAP Ref: 47076</i>	Responsible Officer	Environmental Services Manager	Timescale	31/03/23

General 1 - Service Review			Follow Up Assessment			In Progress	
Review of all services delivered by the Lufton depot is undertaken to include all practices and processes that support each area of delivery.			<p>Following the previous audit, a new Environmental Services Manager has been appointed with specialist knowledge of fleet management. A Transport team and manager are now also in place. A Driver Handbook and a large collection of driver and vehicle policies have been approved at the 03 November 2022 Senior Leadership Team meeting.</p> <p>There are over 150 risk assessments now in place at the site but these were not available at the time of audit as they were being updated. Only one toolbox talk was held during April 2022, however, two others have been prepared for imminent delivery.</p>				
Priority	2	SWAP Ref: 47060	Responsible Officer	Environmental Services Manager	Timescale	31/03/23	
General 2 - Training and Awareness			Follow Up Assessment			In Progress	
Training and awareness should be provided to all staff to ensure they understand the importance of compliance with practices and processes and the risk to themselves and the Council if these are not followed.			<p>Work is ongoing to collate staff training records and good progress is being made to align this to each role. Some mandatory training is still outstanding including the Employee Code of Conduct, which is being reviewed and revised corporately.</p> <p>The training that is planned or being reviewed will ensure that employees are sufficiently aware of the importance of compliance with the SSDC's practices and processes.</p>				
Priority	2	SWAP Ref: 47061	Responsible Officer	Environmental Services Manager	Timescale	31/03/23	
General 3 - Culture			Follow Up Assessment			Complete	
The culture at the depot was also identified as a concern and work to develop and promote a more positive culture is also needed.			<p>With a new Environmental Service Manager and further changes to top level management the culture at the site is improving. There are now increased team meetings as well as regular 1-2-1's enabling employees a safe space to raise any concerns. Union representatives now have better visibility with regular slots to provide support to employees if necessary.</p> <p>Whilst we have not surveyed staff at the depot to analyse culture, through anecdotal evidence from a number of officers at the depot they believe the culture was much more positive with their only concern being the general stress of the move to unitary. New policies and processes are helping but it will take time for changes to be implemented permanently as employees adjust to change.</p>				
Priority	2	SWAP Ref: 47062	Responsible Officer	N/A	Timescale	N/A	