

FINAL INTERNAL AUDIT REPORT
ENVIRONMENT AND COMMUNITY SERVICES DEPARTMENT

FOLLOW UP REVIEW OF WASTE FOR 2017-18

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INTRODUCTION

1. The planned audit of Waste Services completed in November 2016 highlighted serious weaknesses; failure to adhere to contract and financial procedures and the mismanagement of the application of the default process. It was recommended that a management investigation be undertaken to review the robustness of contract monitoring and controls relating to all aspects of the Waste Management contract. The management investigation highlighted further weaknesses in management of the Waste contract.
2. The areas of weaknesses highlighted by the management investigation were further reviewed by the Internal Audit and 15 priority one recommendations were made in a follow-up report of the Waste Services Audit for 2016-17 which was finalised on 29/03/2017.

AUDIT SCOPE

3. This follow up review considered the Internal Audit report issued on 29/03/2017 and the progress made to implement the 15 priority one recommendations and 1 outstanding priority one recommendation from Waste Audit 2015-16.

MANAGEMENT SUMMARY

4. The progress on implementation of the priority one recommendations was closely monitored and updates were reported to Audit sub-committee in June 2017, November 2017 and March 2018. We carried out sample testing and analysis of relevant documentation to confirm the extent to which the recommendations made in our original report had been implemented. We found that 15 Priority 1 recommendations made in the Internal Audit report issued on 29/03/2017 have been implemented. The priority 1 recommendation relating to direct debit payments for Green Garden waste from Waste Audit 2015-16 has also been discharged as the responsibility for implementing this is not within Environment Services control.

SIGNIFICANT FINDINGS (PRIORITY 1)

5. There were 15 Priority 1 findings identified during our original audit. Our follow up reviews have found that all 15 recommendations arising from these findings have now been implemented and the details are recorded in Appendix A.

DETAILED FINDINGS/MANAGEMENT ACTION PLAN

6. Appendix A provides information on the recommendations that were followed-up and the status following the audit review. No new finding and recommendations were raised as part of this review. Appendix B also gives definitions of the priority categories.

ACKNOWLEDGEMENT

7. We would like to thank all staff contacted during this review for their help and co-operation.

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
1	<p>Outstanding credits for defaults should be recovered from the contractor as soon as possible.</p> <p>Methodology for calculation of default and procedure for recovery of defaults going forward should be reviewed.</p> <p>Management should ensure that correct default rates are applied to the credits received from the contractor.</p>	1	<p>The contractor was written to by the Director of Environment on the 22 February 2017 outlining the under-recovered defaults since 2008 and the value of these. The contractor was asked to confirm these figures and agree a process for recovery.</p> <p>The contractor has since responded seeking clarification on the calculation of the defaults and the values.</p> <p>LBB have replied and are awaiting further response.</p> <p>Follow up comments June 2017: The contractor has responded and are disputing the claim by LBB for defaults.</p> <p>At the time of writing, as requested by the Director of Environment, Legal Services have been asked to draft a response to the contractor to be sent on behalf of the Director of Environment.</p>	Director of Environment	March 2017	<p>Follow up March 2018:</p> <p>The acceptance of the Performance Management Framework(PMF) with adjustments made for Green Garden Waste Service was confirmed by the contractor in an email dated 20/02/2018. The confirmation has been formalised in CCN WM 25. The contractor was invoiced the settlement value of disputed defaults on 23-02-2018 which was paid on 11/04/2018.</p> <p>Management also confirmed that the agreed settlement of the inflationary index value will be applied to the February core invoice, defaults year-</p>	Implemented. (March 2018)

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
			<p>Follow up November 2017: ECS management advised that a resolution has been achieved with the contractor, and an agreement reached on the outstanding defaults. This was evidenced by a letter received from the contractor on the 18.10.17, setting out the agreed actions from the meeting on the 17.10.17. This includes the decimal points, indexation, disposal mechanism, contract variations and the claim for performance deductions and as such ends the dispute between the Authority and the contractor.</p> <p>The settlement for defaults has been agreed [Redacted] with an additional [Redacted] attributable for previous year's indexation. Some legal work is required to formalise this.</p>			<p>to-date (April 2017 to December 2017) will be applied to the February 2018 variable invoice. January 2018 applied PMF defaults (PAV values) will be applied to January 2018 variable invoice.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	
2.	Payments going forward should be based on actual cost of disposal with savings achieved	1	The contractor have been informed of the correct methodology and the invoicing and payments will now be applied on the actual costs of disposal with the savings shared at	Director of Environment	March 2017	<p>Follow up November 2017:</p> <p>Internal audit checked the payment on statement of disposal</p>	Implemented (November 2017)

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	<p>from recycling shared at the end of the financial year. Officers working on contracts need to understand the payment mechanism and ensure sufficient checks and validations are undertaken before signing off invoices for payments.</p>		<p>the end of the annual period.</p> <p>Follow up June 2017: Having reviewed the process and the documentation and sought advice from Finance colleagues, it should be made clear that the recommendation is inaccurate as it states that payments should be made on actuals with any financial share being reconciled at the end of the year.</p> <p>The payment mechanism states that the amount to be invoiced by the contractor should be the lower price of the waste disposed of, whether that be Target or Actual tonnages, and that any financial benefit gained based on this calculation should be shared monthly not annually.</p> <p>The Director of Environment can confirm that the correct (not the recommended) calculation is now being applied to the monthly payment mechanism and that appropriate levels of checks and validations are being carried out before authorisation is made.</p>			<p>costs for June, July and August 2017. The Payment mechanism was applied correctly for the three months tested. The payment mechanism credit due to LBB for 2016-17 of £283,404 was also deducted from the above payment on the statement.</p> <p>Management advised that the monthly profit share will be reviewed every 6 months; if the contractor achieves 50% below target, they qualify for profit share, if not, they receive the target only. This will be backdated to April 2017, taking into consideration the issues covered by the agreement letter.</p> <p>The Contract Manager has reconciled the</p>	

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						<p>ticket numbers for the August 2017 invoice. A detailed process has been written to support the new payment mechanism; a draft copy has been made available to audit although it should be noted that the calculation of income section is still in draft.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	
3.	Contract officers need to ensure that any variations to contracts need to be actioned formally via Change Controls as set out in the formal contracts.	1	<p>Contract officers have been reminded of the need for variations to contracts to be actioned formally as set out in the formal contracts. Any variations must be authorised by the contract manager, the Head of Finance and the Director of Environment.</p> <p>This is now set out clearly in the</p>	Director of Environment	March 2017	<p>Follow up March 2018:</p> <p>The training issue around contract staff understanding Contract Procedure Rules (CPR) has been addressed. The Section has received a</p>	Implemented (March 2018)

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			<p>Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: As part of the negotiations and dialogue with the contractor, the documentation for the earlier changes is being brought together. The aim is to have an agreed Change Control, to cover these service changes, in place in the next month.</p> <p>Managers are being trained in the need to ensure documentation is properly prepared, signed and stored.</p> <p>Corporate training on Contract Procurement Rules and Financial Regulations is planned in the next month.</p> <p>Follow up November 2017: As discussed in the agreement letter, historic changes are being identified and documented. To address the training needs identified by this finding, all managers have redone the Contract Procedure</p>			<p>Contract Management Training course on the 27th November. The Head of Procurement is also scheduled to deliver a ½ day training on CPR in March 2018.</p> <p>The Financial Regulations online training course has now been completed by staff involved in the Waste contract.</p> <p>The historic changes to the contract and their financial implications were identified by management with input from Finance and Commissioning and captured in 26 Change Control Notices. These change control notices were agreed and signed by the contractor on</p>	

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			Rules online training. Managers are also being booked onto the new commissioning and contract management training being provided in October/November 2017 by the Director of Commissioning. The Head of Procurement will also be delivering a training course specific to ECS and a facilitator/trainer has been booked by ECS for the 27.11.17 to take ECS contract managers through best practice.			20/02/2018. The deed of variation to formalise the CCNs and the extension of contract has been sent to the contractor to sign on 06/03/2018. This was formally sealed on 28/03/2018 as confirmed by the Legal services. Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.	
4.	All write-offs need to be evidenced and an audit trail retained. Financial Regulations also need to be followed with regard to Director of Finance approval and Portfolio Holder approval if	1	Officers have been reminded of the need to follow Financial Regulations and to have accurate and timely evidence and an audit trail for all write-offs, including the correct authorisation. Follow up June 2017: Corporate training on Contract	Executive Director of ECS	March 2017	Follow up March 2018: The training issue relating to write offs, identifying what is a write off and the correct approval /authorisation limits will	Implemented (March 2018)

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
	relevant.		<p>Procurement Rules and Financial Regs is planned in the next month.</p> <p>Follow up November 2017: Training is in place to address this also. There is a training issue generally around write offs, identifying what is a write off and the correct approval/authorisation limits. Write offs will be included in the CPR and Financial Regulations training to be delivered by the Head of Procurement. Any future issues with Paper will be treated as write offs and the relevant mangers are aware of this. Whilst training will reinforce this, the only way this can be tested is if the issue happens again and paper needs to be 'written off'.</p>			<p>be included in the Financial Regulations training and the CPR training to be delivered by the Head of Procurement.</p> <p>The responsibility of storage of paper, proper separation of paper for recycling to avoid rejected loads of paper and management of paper rejected by a re-processor on account of contamination is formalised in a procedure note. The contractor has confirmed by email on 07/03/2018 that they endorse this procedure.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence</p>	

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
						reviewed.	
5.	<p>All formal meetings with contractors need to be document and filed in a central directory so other staff within the team are able to access should it be required.</p>	1	<p>Officers have been reminded of the need to have formal contract meetings and for these to be properly minuted and the documents stored in a central directory.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: The Director of Environment can confirm that all meetings taking place between LBB and contractor are now held with at least 2 LBB officers present and they are accurately minuted and the records stored on a shared accessible drive.</p> <p>Follow up November 2017: Internal Audit reviewed the Neighbourhood Management for Waste meeting minutes available on the Neighbourhood management team-site. No contract monitoring meeting took place in July and August 2017. Internal Audit therefore reviewed the May, June</p>	<p>Director of Environment/Executive Director of ECS</p>	<p>March 2017</p>	<p>Follow up March 2018:</p> <p>As part of the follow up audit, the contract monitoring meeting minutes for October, November and December 2017 which were available on Neighborhood Management team-site were reviewed. The minutes were detailed and meetings followed the performance management template as documented in the Waste Contract Monitoring Framework. It was however noted that timescales for completion of actions were not recorded in all instances.</p> <p>Internal Audit concludes that the</p>	<p>Implemented (March 2018)</p>

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			<p>and September 2017 minutes to ensure that the meetings followed the performance management template as documented in the Waste Contract Monitoring Framework. It was noted that:</p> <ul style="list-style-type: none"> • The meetings did not follow the performance management template and all expected monitoring areas were not covered. • The job titles of the attendees were not recorded so it is not clear if the officers fulfilled the contract monitoring role for LBB or the contractor. • Timescales for completion of actions were not recorded. <p>Management advised that due to the Assistant Director of Environment being seconded to work on the Commissioning Programme for the majority of his time, the new contract manager was responsible for the contract meetings without the support of the AD who had previously led the meetings. The above comments of</p>			<p>recommendation has been implemented based on the evidence reviewed.</p>	

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			<p>the Audit have been noted and improvement made.</p> <p>A specific Minute template has now been produced to ensure all the key elements of the Monitoring Framework are dealt with at the monthly meetings.</p> <p>They have also developed an updated Performance Monitoring Framework to ensure it is fit for purpose, robust and delivers the desired outcomes. This will be populated and discussed at the monthly contract meetings.</p> <p>Unfortunately there were no meetings in July and August due to Annual Leave and shortage of substitutes available for both LBB and the contractor. This was recorded on the Team Site.</p> <p>Management will ensure leave arrangements in the future mean that at least one Contract Manager or Head of Service is available to attend meetings. The contractor has</p>				

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			been instructed to do the same.				
6.	Supporting documents should be retained to evidence contract monitoring and an audit trail of action taken and decisions made.	1	<p>Officers have been reminded of the requirement to retain supporting documents to evidence contract monitoring and decision making.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: The Contract Monitoring framework has been adopted by the Director of Commissioning as the corporate framework.</p> <p>Supporting documents are now retained and saved on a shared drive, accessible to the appropriately authorised officers.</p> <p>Any contractual decisions made are recorded and saved in this area.</p> <p>Follow up November 2017: The Waste Contract Monitoring Framework establishes guidance for the required documentation for Contract Management.</p>	Director of Environment/Executive Director of ECS	March 2017	<p>Follow up March 2018:</p> <p>The revised Waste Contract Filing Structure was reviewed. It was in the process of being populated.</p> <p>Once this exercise is completed, it is proposed to establish a similar structure for all Environment contracts. This can be accessed in real time via Waste Contract Management Site.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	Implemented (March 2018)

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			<p>In addition Environment Services have commissioned a project to establish a Contract Filing system, which will put in place a comprehensive system to store all relevant paperwork for all Contracts under their control.</p> <p>Managers are being trained in the need to ensure documentation is properly prepared, signed and stored.</p> <p>The objective of the Contract Filing system project is to establish a comprehensive filing system, for all Environment Contracts, with input from Finance, Commissioning, and Legal, with the aim of making it possible to access all of the key documents for the Contract through a single point, regardless of where the Documents are stored electronically.</p> <p>The Quality standards of the Documents will also be reviewed, and guidance given to managers on what should be included, to ensure that the documents provide all</p>				

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
			relevant information.				
7.	A proper reconciliation process should be put in place to reconcile the weighbridge figures and the invoice payments.	1	<p>Officers within the Street Scene & Greenspaces division have completed an exercise to produce a process an automated system for reconciling the weighbridge tonnage figures and the proposed tonnages from the contractor.</p> <p>This will ensure that the figures included on the invoices have already been reconciled. Contract officers will then carry out manual checks to confirm the figures before invoices are signed by the appropriate Chief Officer.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: This system is being used on a regular basis and the Director of Environment has requested that Audit carry out an assessment of the process to validate it.</p> <p>Follow up November 2017: The draft process has been</p>	Director of Environment	March 2017	<p>Follow up March 2018:</p> <p>Management advised that the November and December disposal Invoices were reconciled using the new process and related documents were available on the contract filing system. Internal Audit reviewed the methodology to reconcile disposal tonnage to support payment of disposal invoices. The methodology was applied correctly for the two months tested.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	Implemented (March 2018)

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			reviewed by Internal Audit, reconciling ticket numbers, and setting out the requirements for the inspection of Disposal tickets.				
8.	There should be a proper and meaningful process in place to ensure that invoices are checked and authorised in accordance with Financial Regulations.	1	<p>The process for the checking and authorising of invoices has been reviewed and amended and will include input from the Head of Finance as appropriate.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: The invoice payment process is checked and validated by 2 different officers before being authorised and the relevant supporting paperwork is attached to the invoice.</p> <p>Follow up November 2017: Detailed process maps have been drawn up and implemented to ensure that separation of duties is in place.</p> <p>Training is being given to Contract</p>	Executive Director of ECS	March 2017	<p>Follow up March 2018:</p> <p>The Financial Regulations online training course has now been completed by staff involved in the Waste contract.</p> <p>A random sample of 5 invoices for the period October, November and December 2017 was selected and reviewed to ensure that verification checks were undertaken, invoice were arithmetically correct, segregation of duties was evidenced and payment authorisation was in accordance of</p>	Implemented (March 2018)

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
			management staff in Financial Regulations.			Financial Regulation. The checks were satisfactory for all 5 invoices in the sample. Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.	
9.	Officers working with contractors need to consider the cash flow of the Council and ensure that the Council's interest is protected at all times.	1	Officers have been reminded of the need to consider the cash flow of the Council to ensure that the Council's interest is protected at all times. This is now set out clearly in the Contract Monitoring framework produced by the Department. Follow up June 2017: The specific issue that this relates to has now been dealt with and the correct application of the payment mechanism is being applied – as per No. 2 above. Internal Audit will test the process at the time of next	Executive Director of ECS	March 2017	Follow up November 2017: Internal Audit reviewed the application of payment mechanism to the disposal invoices for June, July and August 2017. For the month of June and July 2017, the lower price of the waste disposed, which was the Target tonnages was paid. For August 2017, the lower price of the waste disposed,	Implemented (November 2017)

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
			follow up.			<p>which was the actual tonnages was paid and the financial benefit gained based on this calculation was shared 50-50 between LBB and the contractor.</p> <p>It was noted that the payment mechanism credit owed for 2016/17 was deducted from the disposal payment on account September 2017.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	
10.	The information presented to committee should be accurate and vetted by an independent	1	Localised information is generated by the ECS Contract Support Team and provided to the Neighbourhood Management Service Leads for contract management purposes.	Director of Environment	April 2017	<p>Follow up November 2017:</p> <p>The recruitment request for a Head of</p>	Implemented (November 2017)

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	officer.		<p>This information is held on a central database which will be fully accessible by the Corporate Monitoring Function.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: The DoE has bid for additional resources to appoint a Head of Performance Monitoring and Business Support and 2 Performance Officers who will act as the independent checks regarding the presentation of information. Until this is in place the Business Support Team Manager is acting as the independent check in addition to their current duties.</p>		September 2017	<p>Performance Monitoring and Business Support and 2 Performance Officers was approved by the Executive in August 2017.</p> <p>Internal Audit verified the information to support the update on the Waste contract provided to Environment PDS in June 2017. The supporting information was pulled directly from the weighbridge system and was satisfactory. Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	

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11.	<p>Contract procedure rules requires that 2 officers are present to validate the discussions and record accurately what has been agreed. For future negotiations with the contractors, contract officers need to include a representative from finance to ensure that the Council is getting value for money.</p>	1	<p>Officers have been reminded of the need to have a minimum of 2 LBB officers present at all contract meetings and where financial issues are being negotiated then the Head of Finance or their representative must be present.</p> <p>This is now set out clearly in the Contract Monitoring framework produced by the Department.</p> <p>Follow up June 2017: As an example of this practice the Head of Finance recently attended a meeting with the DoE, Head of Service and representatives of the contractor to confirm the invoicing and payment mechanism process. Internal Audit will check the evidence at the time of next follow up.</p>	Executive Director of ECS	March 2017	<p>Follow up November 2017:</p> <p>Management advised that officers have been reminded of the need to have a minimum of 2 LBB officers present at all contract meetings and where financial issues are being negotiated then the Head of Finance or their representative must be present.</p> <p>The Head of Finance attended the final contract negotiation meeting with the Director of Environment, Executive Director of ECS, Director of Commissioning and the Assistant Director of Commissioning on the 17 October 2017.</p>	Implemented (November 2017)

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						Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.	
12.	Redacted	1	Redacted	Director of Environment/Executive Director of ECS	March 2017	Redacted	Implemented (November 2017)
13.	A signed copy of contract should be held securely by the Legal team along with any agreed variations.	1	<p>The strong room arrangements for booking contracts in and out are being reviewed. An internal audit has been requested of contract execution and sign off procedures which will take place in 2017-18.</p> <p>Follow up June 2017: The Waste Contract will be signed and placed under seal once the negotiations with the contractor have been completed, and the working party on the change control and consequent variation has finished its work.</p> <p>Follow up November 2017:</p>	Director of Corporate Services	March 2017	<p>Follow up March 2018:</p> <p>The historic changes to the contract and their financial implications were identified by management with input from Finance and Commissioning. The changes were captured in 26 Change Control Notices (CCNs). These CCNs were agreed and signed by the</p>	Implemented (March 2018)

No	Original recommendation (Internal Audit report 29/03/2017)	Priority	Management comment	Responsibility	Agreed timescale	Internal Audit follow-up comments	Status
			A revised draft of the Contract has been produced and is in the process of being reviewed. Now the negotiations have concluded on the default dispute it is envisaged that the Contract Change Control Notices can be completed and the Contract Variation signed within the next 2 months.			contractor on 20/02/2018. The deed of variation to formalise the CCNs and the extension of contract has been sent to the contractor to sign on 06/03/2018. Legal services confirmed on 28/03/2018 by email that the Deed of Variation and the contract has been sealed by the Council. Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.	
14.	Training on both Contract Procedure Rules and Financial Regulations should be mandatory for all officers involved in	1	Bespoke training on Contract Procedure Rules (CPR) and Financial Regulations (FR) can be arranged through Head of Procurement and Head of Audit respectively. The training package	Director of Environment	March 2017	Follow up November 2017: Bespoke training on Contract Procedure Rules (CPR) and	Implemented (November 2017)

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	<p>contract management along with refresher training being undertaken periodically.</p>		<p>used will be available on the manager's toolkit for CPR. It is a management responsibility to identify and request training for officers involved in contract management and contract monitoring.</p> <p>Follow up June 2017: The Director of Environment has identified that there is a need for Contract Management Training for all managers with responsibility for contract management within his Division.</p> <p>It is expected that this training will be delivered in house and be tailored to meet the needs of the services provided within Environment Services.</p>		<p>July 2017</p>	<p>Financial Regulations (FR) is being arranged through the Head of Procurement. The training package used will be available on the manager's toolkit for CPR. It is a management responsibility to identify and request training for officers involved in contract management and contract monitoring.</p> <p>The issues identified in this Audit have also been addressed in the Waste Contract Management Framework, which is the template for the Council's new Contract Management Framework Document.</p> <p>In addition, Environmental Services are putting in</p>	

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						<p>place additional training on Contract Management best practice; so that Contract managers better understand why these rules are in place and how to drive best value for the Service.</p> <p>Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.</p>	
15	A departmental review of contract management process within the ECS is recommended to make it robust.	1	<p>Building on the production of the Contract Management Framework a review of the management processes across ECS will be undertaken.</p> <p>Follow up June 2017: This commenced in March 2017 with the Waste Services and a programme of review is now in place within the Environment</p>	Executive Director of ECS	March 2017	<p>Follow up March 2018:</p> <p>Management advised that review of Waste Services is complete. The review of Street Cleaning was delayed due to dealing with invoicing issues with Waste.</p>	Implemented (March 2018)

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			Division. Pest Control and Stray Dogs is under way and other services will follow over the next 6-12mths. Follow up November 2017: Following completion of implementation of the recommendations from the review of Waste Services the Street Cleansing Service will be reviewed. Target date of completion end December 2017.			The Director of Environment has met with the contractor to map existing processes. The filing structure will be populated. Performance reports are being reviewed against the Contract Monitoring Framework. Internal Audit concludes that the recommendation has been implemented based on the evidence reviewed.	

Definition of priority categories.

Priority 1

Required to address major weaknesses and should be implemented as soon as possible

Priority 2

Required to address issues which do not represent good practice

Priority 3

Identification of suggested areas for improvement

