

**PROGRESS UPDATE ON IMPLEMENTATION OF HIGH PRIORITY RECOMMENDATIONS FROM 2015/16 AUDIT PLAN PREVIOUSLY REPORTED TO COMMITTEE**

High Priority Recommendation	Agreed Action	Responsible Officer	Implementation Date	Current Position
<b>Cash Handling (Reported November 2015)</b>				
<p>Gypsy site rent receipts were not being issued by the collecting officer for monies collected and in this respect any allegations of fraud or irregularity could not be systematically refuted.</p> <p>In addition the rent account system is not operational and individual rent accounts are not up to date.</p>	<p>Signed receipts will be issued for all gypsy site rent transactions. A copy of this will be retained and the receipt number recorded on the weekly collection sheets held.</p> <p>Once operational again up to date rent accounts will be posted with historic rent debit and payment transactions for 14/15.</p>	<p>Housing Operations Manager</p>	<p>Nov 2015</p>	<p>The Gypsy Liaison Officer is issuing receipts for the rent. The Housing Operations Manager continues to monitor this at regular one to one meetings.</p> <p>The rent account system is operational and all historic transactions have been posted.</p>
<b>Fraud Review (Reported November 2015)</b>				
<p>The Council should streamline its strategic approach to include anti-fraud and anti-bribery awareness training that should be delivered as part of an induction process. Having been delivered at induction the training should include a continuing rolling process of bespoke fraud and bribery awareness sessions delivered on a yearly or bi-yearly basis. These session should be supplemented with:</p> <p>Leaflets, flyers and anti-fraud and bribery literature.</p> <p>A dedicated internal and external web-page and a clearly defined whistleblowing or reporting mechanism. (High)</p>	<p>This will be incorporated into the Corporate Governance Action Plan and training will be developed. Initial training will be given to the Leadership Team and bi yearly awareness sessions will be established</p> <p>The induction training will be reviewed to ensure it adequately reflects the Council's approach to fraud.</p>	<p>Corporate Risk &amp; Governance Manager G McTaggart</p> <p>S Mason (induction training )</p>	<p>Dec 2015</p>	<p>Fraud is included within the HR Induction and this will be strengthened within the Corporate Induction once the policies are updated and new leaflets available.</p> <p>There will be a dedicated section on the Intranet to provide guidance to staff on fraud once new Intranet is in place.</p> <p>A Draft Whistleblowing Policy has been updated and was reported to the Corporate Governance Group in January. Further fraud documents will be updated and reported to the Corporate Governance Group in February and then training dates will be agreed</p>

High Priority Recommendation	Agreed Action	Responsible Officer	Implementation Date	Current Position
<b>PCI Compliance Control Framework (Reported November 2015)</b>				
<p>The Council's VPI call recording software is not PCI compliant as the vendor does not support PCI requirements in its current form.</p> <p>(We confirmed that the Council does not use the PCI compliant implementation from VPI <a href="http://www.vpi-corp.com/PCI-Compliance">http://www.vpi-corp.com/PCI-Compliance</a>)</p>	<p>The Council will ensure that the chosen call recording software that 'records' conversations in scope of PCI is PCI compliant. (High)</p>	<p>Mark Lumley, Head of ICT</p>	<p>31 March 2016</p>	<p>The call recording software has been switched off to ensure we are compliant.</p> <p>The Head of ICT is reviewing options to ensure that software is compliant and is in discussions to clarify cost and work required.</p>
<p>We observed that the Adelante PAN capture screen shows the credit card number in plain text while being entered onscreen and there is a CCTV pointing to the screen from the roof.</p> <p>The Camera could view the credit card information of the screen as they are entered in clear text which could result in a breach.</p>	<p>The Council will ensure that only authorised people have access to view the PCI data that is entered on the screen.</p> <p>The Council could add a privacy filter to the screen to block out the cameras view of the screen once the information on which screen has been provided by RSM. (High)</p>	<p>Lee Duffy, Head of Financial Services</p>	<p>30 Sept2016</p>	<p>There is restricted access to the CCTV footage within the Cash Office and it is logged if footage is checked. The quality of the footage is limited on the screen outside the Cash Officer</p> <p>The Head of Finance is looking at purchasing a film/plastic cover that goes over the screens.</p>
<p>No formal PCI roles and responsibilities have been documented</p>	<p>Identify roles and responsibilities that govern the PCI environment and communicate the responsibilities to everyone. (High)</p>	<p>Kathryn Beldon, Director of Finance and Resources.</p>	<p>31 March 2016</p>	<p>This is under review pending the shared service within ICT</p>