

**WAVERLEY BOROUGH COUNCIL**

**AUDIT COMMITTEE**

**27 MARCH 2018**

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**Title:**

**PROGRESS ON THE IMPLEMENTATION OF INTERNAL AUDIT RECOMMENDATIONS**

[Wards Affected: ALL]

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**Summary and purpose:**

To inform the Audit Committee of Senior Management's progress in implementing the recommendations raised by Internal Audit following a review in their service areas. This report will enable the Committee to consider what action is required in respect of those that are overdue or appear likely to be implemented later than the target date.

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**How this report relates to the Council's Corporate Priorities:**

Internal Audit work contributes to the safeguarding of assets against loss and waste and for identifying other value or money issues.

**Financial Implications:**

Internal audit work helps management in achieving good value for money and, individual recommendations may have value for money implications.

**Legal Implications:**

There are no direct legal implications, although good governance is strengthened by attention to the matters raised in audit recommendations.

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**Introduction**

1. This report provides the Audit Committee with the latest position regarding the implementation of Internal Audit recommendations.

Annexe 1 provides the current position on recommendations due for completion at the end of the month of the Audit Committee date.

2. At the previous Audit Committee meeting, members noted the request for a time extension for three recommendations relating to data protection and information security governance. These recommendations correlate to the work currently being completed on the introduction

of the General Data Protection Regulations 2018. Detailed below is an update on the progress being made as at 5<sup>th</sup> March 2018:-

- a. The project is progressing well on target with both the Information Governance Board (IGB) and the Information Governance Group (IGG) meeting fortnightly to ensure that the remaining tasks are progressing as expected and to manage any issues arising.
  - b. The Information Asset Audit was conducted at the end of November 2017 and comprehensive service specific Personal Data Registers have been created. These registers constitute part of the Council's Information Asset Database. The registers have been reviewed by the Heads of Service and their teams for accuracy and going forward will be reviewed on an annual basis.
  - c. The policies and procedures relating to data protection are being reviewed and updated to comply with the new legislation and the final drafts will be finalised in March including the main Information Governance Policy, the Data Retention Schedule and the Subject Access Request and Data Breach procedures.
  - d. Privacy Notices have been reviewed across the Council and a template has been prepared. Once this is finalised it will be used to inform service specific notices with assistance from the legal team. The "Consent" process is also being reviewed (the requirement for people to opt in rather than opt out). A template to conduct Data Protection Impact Assessments will be finalised in March and will be included as a requirement in the project initiation document for any new projects. In addition, the legal team is reviewing the supplier contracts and SLA agreements.
  - e. The recruitment of the Data Protection Officer is under way with the interview stage taking place in March. The post will be part of the Legal team under Policy & Governance.
  - f. A Training Strategy has been devised to ensure all staff are trained at the appropriate level. The Information Governance Board, Group and Champions will receive in-depth trainer led sessions during January to April. All staff have received an initial briefing and will be expected to complete an e-learning module by May. Further all staff briefings will be conducted in May. Arrangements are also currently being made for specific councillor training.
  - g. An internal Communication Strategy has been prepared with a series of subject specific campaigns being launched from March to May 2018.
  - h. IT systems are being reviewed for data deletion functionality to ensure that we are able to comply with right to be forgotten requests. In some instances additional modules may need to be purchased from suppliers in order to delete data the Data Protection section on Waverley's website is also being reviewed and updated with new information.
3. Recommendations relate to the control environment and hence the overall governance and risk management of the Council and it is important that agreed actions are completed within timeframes agreed with the relevant Head of Service.

## **Recommendation**

It is recommended that the Committee:

1. considers the information contained in Annexe 1 and, following discussion at the Audit Committee meeting, identifies any action it wishes to be taken; and
  2. notes the progress being made to comply with General Data Protection Regulations by 25<sup>th</sup> May 2018
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## **Background Papers**

There are no background papers (as defined by Section 100D (5) of the Local Government Act 1972) relating to this report.

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# Audit Recommendations overdue or due within next month





Generated on: 14 March 2018

Action Status	
	Cancelled
	Overdue; Neglected
	Unassigned; Check Progress
	Not Started; In Progress; Assigned
	Completed




## Head of Service Taylor, Robin



<b>Action Code &amp; Description</b>	IA16/22.001 Policies	The Council's Information Management Policy, Record Disposal and Retention Schedule and the Acceptable Use of IT policy were last updated over a year ago. The policies do not cover off the process to be followed in regard to the retention, sharing and disposal of manual or electronic data. The policies also do not cover the procedure to be followed if manual or electronic data is lost or subject to misappropriation.	<b>Exit Meeting Date</b>	02-Jun-2016
			<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA16/22 Information Security Governance		
<b>Agreed Action</b>		<p>The Council will update the Record Disposal and Retention Schedule to ensure it includes the preferred disposal method for all types of data.</p> <p>The Council will ensure that the Information Management policy is updated to include the procedure to be followed if manual data is lost or subject to misappropriation. It should also include Council procedure in regard to manual security measures or physical security re the sharing of all types of information.</p> <p>Both the Acceptable Use of IT policy and the Information Management policy will also be updated to include how data loss/misappropriation is reported to Senior Management.</p> <p>All policy and procedural documentation relating to Information Security Governance will be reviewed and updated where necessary on an annual basis going forward.</p>		
<b>Status</b>		In Progress	<b>Progress</b>	95%
<b>Head of Service</b>	Robin Taylor			
<b>All Notes</b>	As part of the GDPR compliance most of the policies and procedures concerning data protection has been reviewed and updated to comply with the new legislation and the final drafts will be finalised in March including the main "Information Governance Policy", "SAR procedure", "Use of IT" and "Data Breach procedure" as well as "Data Retention Schedule". The final versions of the document will be sent to the Information Governance Board for approval and once approved the reviewed policies can be appended to the system as an evidence of completion.			05-Mar-2018
<b>Action Code &amp;</b>	IA16/22.002 Storage of Records re ISO5489	As per the most recent Information Management Policy (Section 10), all records should be stored in accordance	<b>Exit Meeting Date</b>	02-Jun-2016
			<b>Due Date</b>	30-Apr-2018



		with ISO15489. The policy does not go on to state what the requirements of ISO15489 are.		
<b>Audit Report Code and Description</b>		IA16/22 Information Security Governance		
<b>Agreed Action</b>		The Council will detail the requirements of ISO15489 within the Information Management Policy that staff will need to comply with to ensure records are stored appropriately.		
<b>Status</b>		In Progress	<b>Progress</b>	95%
			<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	This action is being progressed as part of the Council's programme of work in preparation for the implementation of General Data Protection Regulations. It is nearing completion and will be in place by the end of May 2018.			14-Mar-2018

<b>Action Code &amp; Description</b>	IA16/22.004 Procedure	As per comment from the Borough Solicitor at the time of the audit, a documented procedure is not in place detailing how the Council upholds Information Security Governance responsibilities if staff normally responsible are unavailable. The Council also does not have a published structure chart in place showing the members of staff involved with Information Security Governance and the responsibilities they hold.	<b>Exit Meeting Date</b>	02-Jun-2016
			<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA16/22 Information Security Governance		
<b>Agreed Action</b>		The Council will ensure that the Information Governance Strategy is put into place as soon as possible. It will include the procedure to be followed in relation to upholding Information Security Governance responsibilities if staff members who are normally involved are unavailable. It will also include a structure chart which will detail the staff that are involved with Information Security Governance and the responsibilities they hold. The chart will be disseminated to all staff.		
<b>Status</b>		In Progress	<b>Progress</b>	95%
			<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	This action is being progressed as part of the Council's programme of work in preparation for the implementation of General Data Protection Regulations. It is nearing completion and will be in place by 17 April 2018.			14-Mar-2018



<b>Action Code &amp; Description</b>	IA18/02.001 Programme	No formal programme is yet in place for ensuring that the Council's major decision makers and managers and staff with personal data-related responsibilities are fully aware of the forthcoming GDPR legislation and the impact that this is likely to have across the Council.	<b>Exit Meeting Date</b>	03-Jul-2017
			<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018		
<b>Agreed Action</b>		<p>Management will ensure that a programme is put in place to ensure that senior decision makers and those with data management responsibilities are fully aware of the timing and implications for the Council of the new GDPR legislation:</p> <p>Potentially, this will include:</p> <ul style="list-style-type: none"> <li>- Presentations to senior management, information security groups and other staff with key information management responsibilities.</li> <li>- Updating all key data management policies and guidance documents to reflect the changes resulting from the introduction of GDPR.</li> <li>- Publicising the key changes arising from GDPR across the Council, and notifying management as to who to approach or where to find additional guidance on the matter.</li> <li>- Ensuring that data protection training courses for new staff are updated to include guidance on complying with the new legislation and that proposed refresher training for existing staff also reflects GDPR requirements.</li> </ul>		


<b>Status</b>		In Progress	<b>Progress</b>	70%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	All Staff Briefing sessions were conducted in November 2017. The IG Board and Group were created which meet on fortnightly basis. Additional GDPR Champions were selected to support the IG Group representative with the GDPR implementation project delivery. All Data Protection policies and procedure have been reviewed and the final drafts are currently being worked on. Trainer led and e-learning courses are being offered to key stakeholders and involved members of staff and will be rolled out to All staff in April-May 2018. The Councillor training sessions are also being devised. GDPR e-learning module will be included as part of the induction package for all new starters.					09-Mar-2018
<b>Action Code &amp; Description</b>	IA18/02.003 Website Privacy Policy	The Council has a privacy policy on its website which refers to the collection of personal data via the site itself. However, this relates solely to compliance under the Data Protection Act 1998 and has not been updated to take account of the provisions of GDPR and the Council has no formal plan in place to address this.			<b>Exit Meeting Date</b>	03-Jul-2017
					<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018				
<b>Agreed Action</b>		<p>Management will ensure that the Council's existing privacy impact notices are reviewed and updated as necessary to comply with the requirements of GDPR.</p> <p>Management have noted that examples of additional information which organisations are required to provide people with under the new Act, include:</p> <ul style="list-style-type: none"> <li>- Explaining the legal basis for processing the data.</li> <li>- Confirming data retention periods. Informing people that they have a right to complain to the ICO if they think there is a problem with the way the organisation is handling their data.</li> </ul>				
<b>Status</b>		In Progress	<b>Progress</b>	70%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The master template of the new GDPR compliant Privacy Notice was prepared and it is at the final draft stage. Once approved by the IG Board the policy will be put on the Waverley website and service specific policies will be appended to it.					09-Mar-2018
<b>Action Code &amp; Description</b>	IA18/02.004 Review Information Rights Policy and Procedure	The Council has a documented Information Rights Policy/Procedure, but there are no plans in place to ensure that this is reviewed and revised to ensure that it is compliant with GDPR.			<b>Exit Meeting Date</b>	03-Jul-2017
					<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018				
<b>Agreed Action</b>		<p>Management will arrange for its documented approach to ensuring that information rights are met to be reviewed and amended as necessary, in line with the requirements of the GDPR. These will include the following rights relating to individuals:</p> <ul style="list-style-type: none"> <li>- Subject access;</li> <li>- To have inaccuracies corrected;</li> <li>- To have information erased;</li> <li>- To prevent direct marketing,</li> <li>- To prevent automated decision-making and profiling; and Data portability.</li> </ul>				
<b>Status</b>		In Progress	<b>Progress</b>	60%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The Subject Access Procedure was prepared and it is going through the final draft stage. The IT team is still reviewing all current system to ensure that from May 2018 we will be able to correct or erase information. Additional software modules might need to be purchased to enable data correction and erasure.					09-Mar-2018
<b>Action Code &amp;</b>	IA18/02.005 Review Subject Access Request Rules	The Council has an established Subject Access Request (SAR) procedure in place and has provided information for the public regarding the process for obtaining access to their personal data, on its website. However, the above processes and related			<b>Exit Meeting Date</b>	03-Jul-2017
					<b>Due Date</b>	30-Apr-2018

		documentation have not yet been reviewed and updated to take account of the changes to the Subject Access Request rules under GDPR and no formal plans are in place to address this task.		
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018		
<b>Agreed Action</b>		<p>Management will ensure that the Council's Subject Access Request procedures, together with any associated guidance for staff and members of the public are reviewed and updated in line with the new requirements under GDPR.</p> <p>Management have noted that these include:</p> <ul style="list-style-type: none"> <li>- In most cases the organisation will not be able to charge for complying with a SAR.</li> <li>- There will be a month to comply with SARs, rather than the current 40 days.</li> <li>- There are new grounds for refusing to comply with a SAR which is manifestly unfounded; excessive requests can be charged for or refused.</li> <li>- Where a request is refused, policies and procedures should be in place to demonstrate why the request meets the refusal criteria.</li> </ul> <p>Additional information must be disclosed to people making requests, such as data retention periods and the right to have inaccurate data corrected.</p>		
<b>Status</b>		In Progress	<b>Progress</b>	80%
			<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The Subject Access Procedure has been now amended to ensure compliance with the new legislation. The final draft is reviewed by the legal team at then moment. The IT team will be easily able to amend the response time from 40 days to a month in the current application used for logging all SAR requests - the change will be implemented in May. Waverley already has an online form allowing our residents to raise subject access requests and guidance will also be included in the master Privacy Notice on our website.			09-Mar-2018
<b>Action Code &amp; Description</b>	IA18/02.006 Legal basis of processing Personal data	The Council has produced a range of documentation concerning the legal basis for processing personal data in line with the requirements of the Data Protection Act 1998; for example it has published a Fair Processing Notice in respect of the re-use of Council Tax data on its website. However, the organisation has not documented the legal basis for processing all the different types of personal data it holds and considered whether the results of that exercise have any practical implications for its approach to personal data processing under GDPR.	<b>Exit Meeting Date</b>	03-Jul-2017
			<b>Due Date</b>	20-May-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018		
<b>Agreed Action</b>		<p>Management will ensure that the legal basis for processing personal data handled by the Council is fully documented and the practical implications of changes stipulated under GDPR are considered.</p> <p>Management have noted that these could include:</p> <ul style="list-style-type: none"> <li>- The modification of some individuals' rights, depending on the legal basis for processing.</li> <li>- Impacts on the SAR process.</li> </ul> <p>Some people will have a stronger right to have their data deleted where the organisation uses consent as its legal basis for processing.</p>		
<b>Status</b>		In Progress	<b>Progress</b>	70%
			<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The Personal Data Registers which specify what personal data we collect in each service area include a field specifying what our legal basis for collection is. The legal basis for processing will also be included in our Master Privacy Notice.			09-Mar-2018


<b>Action Code &amp; Description</b>	IA18/02.007 Consent processes	The Council has no plans in place for reviewing and updating its processes for seeking, obtaining and recording consent to handling individuals' personal data in line with changes to those processes contained within GDPR.	<b>Exit Meeting Date</b>	03-Jul-2017
			<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018		
<b>Agreed Action</b>		<p>Management will ensure that its processes for seeking, obtaining and recording consent to handling individuals' personal data are reviewed and updated in accordance with the requirements of the GDPR.</p> <p>Management have noted that the requirements for consent processes under the new Act include:</p> <ul style="list-style-type: none"> <li>- Explicit consent must be given for data collection, data usage and marketing.</li> <li>- Consent must be verifiable /subject to an appropriate audit trail.</li> </ul> <p>There must be positive indication of agreement of personal data being processed, i.e. this must not be inferred from silence, pre-ticked boxes or Inactivity.</p>		
<b>Status</b>		In Progress	<b>Progress</b>	40%
<b>Head of Service</b>				Robin Taylor
<b>All Notes</b>	A registered of all consent seeking forms and clauses used around the council is being created. At the moment each service team is gathering this information which will form part of the Consent Register. All forms and clauses will be reviewed by the legal team to ensure that they are still fit for purpose and compliant with the new Data Protection regulation.			09-Mar-2018
<b>Action Code &amp; Description</b>	IA18/02.008 Dealing with Childrens Personal Data	<p>The Council has produced a limited amount of guidance concerning requests for access to children's personal data from their parents or guardians.</p> <p>Regarding requests from children themselves, the Council has provided its staff with a link to the ICO's Subject Access Code of Practice document dated February 2014, for reference when handling such requests.</p> <p>However, none of the above information has been reviewed and updated to reflect the new requirements regarding children's personal data requests contained within the GDPR.</p>	<b>Exit Meeting Date</b>	03-Jul-2017
			<b>Due Date</b>	30-Apr-2018
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018		
<b>Agreed Action</b>		<p>Management will ensure that the Council's existing documented guidance on handling children's personal data is reviewed and updated so as to comply with the requirements of the GDPR.</p> <p>Management have noted that these include:</p> <ul style="list-style-type: none"> <li>- Special protection for children's Internet / social networking.</li> <li>- The need for new systems to verify individuals' ages and to gather parental or guardian consent for the data processing activity.</li> </ul> <p>Children under the age of 13 (in the UK) require parental / guardian consent to be able to access their personal data.</p>		
<b>Status</b>		In Progress	<b>Progress</b>	70%
<b>Head of Service</b>				Robin Taylor
<b>All Notes</b>	The Information Audit haven't found any areas in which our organisation would offer information services directly to children and the action has been marked as not applicable. However, as we might want to provide such service in the future a guidance to all staff for how children data should be obtained (for example if a parent or guardian consents to it) and handled needs to be devised.			09-Mar-2018
<b>Action Code &amp; Description</b>	IA18/02.009 Investigating Data Breaches	The Council does not have written procedures for detecting, reporting and investigating personal data breaches.	<b>Exit Meeting Date</b>	03-Jul-2017




				<b>Due Date</b>	30-Apr-2018	
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018				
<b>Agreed Action</b>		<p>Management will ensure that documented personal data breach procedures are produced which take account of the latest requirements in this area that have been incorporated into the GDPR. These include:</p> <ul style="list-style-type: none"> <li>- The need for the data breach procedures to include guidance on breach detection, reporting and investigation.</li> <li>- The requirement to identify the types of data held (for which a breach has occurred) that fall within the notification requirement.</li> <li>- The need for policies for managing personal data breaches.</li> <li>- The need for data breach notifications to be issued to the ICO within 72 hours where the individual is likely to suffer some form of damage, such as through identity theft or a confidentiality breach.</li> <li>- The rule that failure to report a breach when required to do so could result in a fine, as well as a fine for the breach itself.</li> </ul> <p>Confirmation that fines may be imposed by the ICO amounting to up to 20 million euros or 4% of annual turnover, whichever is the greater.</p>				
<b>Status</b>		In Progress	<b>Progress</b>	50%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The current Data Breach procedure is currently being reviewed and a clear guidance to all staff on what constitutes a breach and how to report it needs to be still prepared.				09-Mar-2018	
<b>Action Code &amp; Description</b>	IA18/02.010 Privacy Impact Assessment Process	The Council has not reviewed and updated its privacy impact assessment processes to ensure that these comply with the guidance in the GDPR.		<b>Exit Meeting Date</b>	03-Jul-2017	
				<b>Due Date</b>	30-Apr-2018	
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018				
<b>Agreed Action</b>		<p>Management should ensure that the Council's Data Protection by Design and Privacy Impact Assessment processes are reviewed and aligned with the guidance on such processes contained in the GDPR. This includes the following:</p> <ul style="list-style-type: none"> <li>- The now express legal requirement for organisations to take a 'privacy by design' and data minimisation approach.</li> <li>- DPIA (Data Privacy Impact Assessments) are required for high-risk situations, for example where a new technology is being deployed or where a profiling operation is likely to significantly affect individuals.</li> </ul> <p>If the DPIA indicates High Risk processing, e.g. new technology, the ICO will need to be consulted.</p>				
<b>Status</b>		In Progress	<b>Progress</b>	70%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The Data Protection Impact Assessment (DPIA) form has been prepared and will be included in a suit of pre-requisite documentation required ahead of a project launch. The form and the guidance on when DPIA needs to be conducted are in a draft version at the moment and will be sent for the approval from the IG Board.				09-Mar-2018	
<b>Action Code &amp; Description</b>	IA18/02.011 Roles & responsibilities	As the SIRO (Senior Information Risk Owner) for the Council, the Borough Solicitor/Head of Legal Services has nominal responsibility for Data Protection matters. However, the detailed responsibilities associated with the Data Protection role have not currently been documented. The allocation and responsibilities pertaining to other Data Protection roles within the organisation have similarly not been documented.		<b>Exit Meeting Date</b>	03-Jul-2017	
				<b>Due Date</b>	30-Apr-2018	
<b>Audit Report Code and Description</b>		IA18/02 Framework for compliance with the General Data Protection Regs 2018				
<b>Agreed Action</b>		Management will ensure that:				

		<ul style="list-style-type: none"> <li>The need for a Data Protection Officer role is identified within the Council's structure and governance arrangements.</li> <li>The role is formally allocated to an individual with the knowledge, support and authority to carry out the duties associated with it effectively.</li> <li>The detailed responsibilities attached to the role should be documented and communicated to the individual concerned.</li> <li>Additional roles which support the duties of the Data Protection Officer should also be formally allocated and the responsibilities associated with them documented and made available to those concerned.</li> </ul>				
<b>Status</b>		In Progress	<b>Progress</b>	70%	<b>Head of Service</b>	Robin Taylor
<b>All Notes</b>	The recruitment process for the Data Protection Officer has already started with the interview date set on the 13/03/2018. Going forward the Information Governance Board and the GDPR Champions will continue to support the DPO in his role to ensure the new legislation compliance.					09-Mar-2018

**Head of Service Wagstaff, Hugh**

<b>Action Code &amp; Description</b>	IA18/03.002 On-line Rent Payment System	Through discussions with the Rent Collections Managers and review of the review of the Housing Development plan 2017-19 we confirmed that as part of this process the Council will review information held on the on rent Collection online. This will also include the introduction of an interactive online rent payment system which will allow users to view more information about their account, for example payment history, compared to the current system which only allows users to make payments. There is risk that users might not be able to make informed decisions as the information provided currently is limited.	<b>Exit Meeting Date</b>	24-Jul-2017		
			<b>Due Date</b>	31-Mar-2018		
<b>Audit Report Code and Description</b>		IA18/03 Rent Collection				
<b>Agreed Action</b>		As planned the Council will ensure that tenants are provided with up to date detailed information in relation to rent collection, rent increases and arrears on the website.				
<b>Status</b>		In Progress	<b>Progress</b>	77%	<b>Head of Service</b>	Hugh Wagstaff
<b>All Notes</b>	System to be tested this month					10-Oct-2017

<b>Action Code &amp; Description</b>	IA18/03.004 Debt Collection Agency	We noted that the Council Service Level Agreement with Rossendale Collect debt collection agency was last updated in December 2007. There is a risk that the service being provided might no longer be fit for purpose or represent value for money for service being received or meets for the Rent Collection team's needs.	<b>Exit Meeting Date</b>	24-Jul-2017
			<b>Due Date</b>	31-Mar-2018
<b>Audit Report Code and Description</b>		IA18/03 Rent Collection		
<b>Agreed Action</b>		Whilst the debt collection service is a shared service with other services, the Rent Collections team should take the lead or work jointly with other services to review and update the contract in place to ensure it remains fit for purpose and meets the needs of the Council and specifically the rent arrears collection team's requirements.		
<b>Status</b>		In Progress	<b>Progress</b>	50%
<b>Head of Service</b>				Hugh Wagstaff
<b>All Notes</b>	Scope terms of contract - ready to tender			10-Oct-2017