

## INTERNAL AUDIT EXCEPTION REPORT FOR STREET SCENE - DOG WARDENS 2019/20

Fundamental	Significant	Requires Attention	Best Practice
Immediate action required to address a major control weakness which, if not addressed, could lead to material loss.	A recommendation to address a significant control weakness where the system may be working but errors may go undetected.	A recommendation aimed at improving the existing control environment.	Suggested action which aims to improve best value, quality or efficiency.

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<b>Management Control Objective: The system is operated in accordance with up to date policies, procedures, Financial Rules, statutory regulations and legislation.</b>					
2.1	There is no formal policy for stray dogs.	Lack of a formal policy may lead to procedures not being followed resulting in non-compliance with the Environmental Protection Act. Possible breach of national guidance leading to reputational damage in the event of a dispute or error.	1	Significant	A formal policy should be introduced for stray dogs. This should comply with the requirements of the Environment Protection Act 1990 and should be formally approved. <b>Completed.</b>
2.2	Whilst there are some written procedures in place, these do not relate to the operational processes. Furthermore, the Street Scene Manager advised that there may be several different versions of procedure notes and that they are not all held in a central location. The procedure notes that are available are not dated or version controlled.	Failure to have procedure notes in place could lead to incorrect procedures being followed in the event of staff absence, or tasks not being completed in accordance with legislative requirements.	2	Significant	Procedure notes should be produced for all Dog Warden (DW) activities. These should be dated and version controlled and should be available to all relevant staff. <b>Completed.</b>

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2.3	There is no risk register for Dog Wardens.	Risks are not monitored which may result in financial and or reputational loss to the Council.	3	Significant	Risks to the Council in relation to Dog Wardens should be identified, documented and considered. This information should be shared with the Risk and Insurance Team and Senior Management. <b>Completed.</b>
<b>Management Control Objective: There is an appropriate recording process in place for Dog Warden activities.</b>					
4.1	It is stated in the October 2017 Agreement with Hilbrae Pet's Hotel for the Provision of a Dog Collection and Kennelling Service to Shropshire Council that it is an obligation of the service provider to provide the Council with information to update their dog register as soon as possible when a dog is collected. However, this does not occur and often the Environmental Maintenance Team only become aware of a dog being collected when an invoice is received at the end of the month. Furthermore, it is stated that Shropshire Council should be informed of all service requests, whether a dog is physically collected or not, including the time that a service request was received. This is not currently	Non-compliance with the Environmental Protection Act if the register of dogs seized is not up to date as a result of the Council not being notified of stray dogs collected.	4	Significant	In accordance with the 2017 Agreement with Hilbrae Pet's Hotel for the Provision of a Dog Collection and Kennelling Service to Shropshire Council it should be ensured that the Council is provided with information to update the dog register as soon as possible when a dog is collected. Furthermore, the Council should be informed of all service requests made to the kennels whether a dog is physically collected or not, including the time that a service request was received. <b>DW in contact with Hilbrae daily.</b>

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	adhered to and therefore the Council would not become aware of these if no charge is made.				
4.2	A review of twelve invoices received from Hilbrae Pet's Hotel for dogs collected in the Central and South of Shropshire between April 2018 and May 2019 identified two occasions when dogs were collected by Hilbrae during the Dog Warden's normal working hours and no reason was recorded on Confirm as to why the Dog Warden could not attend. A further four occasions were identified where the dog was taken to Hilbrae, but no details were available on Confirm to ascertain whether they were taken by the Dog Warden or a member of the public.	Unnecessary costs to the Council if Hilbrae Pet's Hotel collect dogs when the Dog Warden is available to complete this task.	5	Requires Attention	<p>Where it is not possible for the Dog Warden to collect a stray dog during her normal working hours the reason for this should be clearly recorded on Confirm. This should be subject to management review, to ensure that the duties of the Dog Warden role are being fulfilled.</p> <p><b>Hilbrae are contracted to collect 24/7. This allows the DW to carry out other duties for the entire County.</b></p>
4.3	A review of a sample of 12 stray dog reports between April 2018 and July 2019 identified that on two occasions the action taken was considered insufficient, whereby it is noted on Confirm that the dogs could not be located but that there is no evidence that the Dog Warden made contact with the customer that made the report. On both occasions	Dogs are not found resulting in reputational damage if insufficient action has been taken to perform Dog Warden duties.	6	Requires Attention	If a dog cannot be located by the Dog Warden based on the information logged on Confirm, the customer that made the report should be contacted by the Dog Warden to ascertain whether any more information is available. This should be clearly evidenced on the

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	contact telephone numbers were available.				relevant record on Confirm. <b>All relevant info now recorded on Confirm.</b>
4.4	A review of a sample of 12 stray dog reports between April 2018 and July 2019 identified that on four occasions dogs were returned to owners, but it is not clear whether this was facilitated by the Dog Warden or a third party. On one other occasion it is unclear from the notes on Confirm what action was taken. In addition, whilst it was confirmed that reports of strays are recorded promptly on Confirm as they are made, records are not updated as action is taken and the dates and times of action taken are not recorded. Therefore, it has not been possible to confirm that reports are acted upon in a timely manner.	It is not possible to confirm that sufficient action has been taken in a timely manner. Poor performance may go undetected.	7	Requires Attention	Detailed descriptions of action taken should be recorded on Confirm as soon as possible following the event. Periodic management reviews of records should be undertaken to confirm that sufficient information has been captured and that reports of strays have been responded to in a timely manner.  <b>A new Stray Dog Register (SDR) is now in use to gather all info including the confirm Ref.</b>
4.5	Dogs seized by the dog warden that are returned directly to the owner without being taken to the kennels are not recorded on the Stray Dog Register. Therefore, there is no complete record of all dogs seized. Furthermore, a review of 99 dogs entered to the Stray Dog Register between April 2018 and May 2019	Non-compliance with section 149 of the Environmental Protection Act.	8	Requires Attention	The Stray Dog Register should hold accurate, complete details of all dogs seized, including those that are returned directly to the owner by the Dog Warden. <b>A new version of the SDR is now in use recording all enquiries coming through to</b>

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	identified that inaccurate or incomplete details were recorded for eight; the date of seizure had been recorded incorrectly for seven dogs and the location that the dog was seized was not recorded for one other.				the Council and this is now overseen by the DW.
4.6	A review of nine reports of dog fouling between April 2018 and July 2019 identified that on six occasions the information recorded on Confirm was not updated to evidence that sufficient action was taken. On three occasions it was recorded that street cleansing had been requested, but the records were not updated to show that these were actioned. On the remaining three occasions it was stated that future action would be taken to tackle problem areas, but again Confirm was not updated to evidence that this was completed.	It is not possible to confirm that sufficient action has been taken if records are not updated accurately. Failure to respond to reports of dog fouling could lead to health and safety concerns and may have a negative impact on the Council's reputation.	9	Requires Attention	Where street cleansing is requested by the Dog Warden, confirmation should be sought from the relevant team that this has been actioned. Confirm should then be updated accordingly. Where it is planned that action will be taken in the future to tackle problem areas in relation to dog fouling the report should not be closed on Confirm until the action has been taken and the record updated to evidence this. The confirm system automatically records the job Ref number so this can be checked to see when the work has been completed.
4.7	A review of a sample of nine missing, found or dangerous dogs	Reputational damage if it is perceived the Council has not	10	Requires Attention	Appropriate action should be taken to respond to reports

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	<p>for the period from April 2018 to July 2019 identified that on two occasions insufficient action was taken:</p> <ul style="list-style-type: none"> <li>• In relation to an anonymous report of a dangerous dog on private land, it is stated on Confirm that this is not the Council's responsibility and should therefore be reported to the Police. However, as the report was anonymous this could not be communicated to the customer and no action was taken by a Council officer to inform the police directly.</li> <li>• A lost dog report was closed on Confirm the day after the report being made despite the dog not being found. It is unclear why this was closed so promptly.</li> <li>• A further two occasions were identified where the information recorded on Confirm was insufficient to ascertain exactly what action was taken.</li> </ul>	<p>acted upon reports of lost or dangerous dogs. Non-compliance with section 149 of the Environmental Protection Act.</p>			<p>of dangerous dogs, including reporting dogs to the police directly when reports are received from members of the public. Reports of lost dogs should stay open on Confirm for a specified period in order that the Dog Warden is aware of it.</p> <p>The call centre will inform the customer at the time of the report that all dangerous dog issues should be reported to the Police.</p> <p>The new SDR now records missing dog reports, the information will be passed onto the Kennels at the time of the report, the cases are closed but can be reopened to update, emails are sent to owners to ask if the dog has been found, very few respond.</p>

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<b>Management Control Objective: Income is identified, collected and banked in accordance with procedures.</b>					
5.1	The release / administration fee charged to owners by Hilbrae Pet's Hotel prior to a dog being returned is not in accordance with Shropshire Council's scale of approved charges, currently set at £72.00 (£25.00 statutory and £47.00 discretionary). Instead, owners are charged £40.00 or a reduced rate of £35.00 if their dog has a microchip. The potential lost income has been calculated as approximately £300 - £400 a month.	Financial loss to the Council if charges are not in accordance with the approved rates.	11	Significant	The release / administration fee charged to owners prior to dogs being returned to them should be in accordance with the approved fees and charges.  <b>These figures are incorrect, the Council have supplied the kennels with 2 card machines so the fees, £46 goes direct to the Council.</b>
5.2	Release / administration fees are collected by Hilbrae Pet's Hotel on behalf of Shropshire Council. The value of these is then deducted from the monthly amount the Council pays to Hilbrae Pet's Hotel for the service they provide.	Income is not banked intact. The values for both income and expenditure in relation to Dog Wardens are understated in the statement of accounts. Budget monitoring is inaccurate which could impact on decisions made relating to the future delivery of the service.	12	Significant	All income received by Hilbrae Pet's Hotel on behalf of Shropshire Council should be paid into the Council's bank account. The Income Team should be contacted to assist with this.  <b>Completed.</b>
5.3	If the Dog Warden can scan a dog's microchip and reunite it with the owner without taking it to the kennels no charge is made, due to the perceived security risk of the Dog Warden collecting and	Loss of income if owners are not charged for dogs being returned to them by the Dog Warden.	13	Significant	Arrangements should be made to enable the Dog Warden to collect income in a secure manner. Consideration should be given towards the use of

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	transporting income.				mobile card terminals for card payments to be made, or contacting the Customer Service Centre for dog owners to make a telephone payment prior to their dog being returned to them.  <b>Completed.</b>
<b>Management Control Objective: Purchases are appropriate, authorised, recorded correctly and comply with Financial Regulations and Contract Procedure Rules.</b>					
6.1	Two versions of the agreement with Hilbrae Pet's Hotel were provided during the audit. However, neither of these have been signed by a representative of either Shropshire council or the service provider. Furthermore, the most recent version of the agreement was due to run until 31st October 2018. Therefore, there is currently no agreement in place.	Terms and conditions are not agreed resulting in dispute in the event of a challenge or incident. Performance cannot be measured leading to services not being provided or an inadequate level of service resulting in a financial loss to the Council.	14	Significant	A formal agreement signed by both parties should be held for the provision of the out of hours dog service.  <b>Completed.</b>
6.2	The agreement with Hilbrae Pet's Hotel does not refer to the relevant legislative requirements and has not been updated to state that the service provider will collect all dogs in the North of Shropshire whilst there is a vacancy for a Dog	Failure to ensure that dogs are seized in accordance with legislative requirements could result in Shropshire Council not properly discharging the functions for dealing with stray dogs found in the area of the authority.	15	Significant	The agreement with Hilbrae Pet's Hotel should be updated to ensure that all activities are carried out in accordance with section 149 of the Environmental Protection Act 1990.



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	Warden in this area.				<p>Furthermore, it should be updated for the arrangement to collect all dogs in the North of Shropshire whilst there is a vacancy for a Dog Warden.</p> <p><b>Completed.</b></p>
6.3	<p>The agreement with Hilbrae Pet's Hotel does not include any details of action to be taken in the event that a banned breed of dog is collected. This has been identified as an issue in a previous case where Hilbrae collected a dog on behalf of the dog warden that was a banned breed. Hilbrae have a policy of not destroying any dog and refused to release the dog to the Council knowing it would be destroyed. The Council were liable for all the associated costs until the case went to court and Hilbrae were awarded ownership of the dog. If this dog had been collected by the dog warden it would have been taken to the police station.</p>	<p>Additional financial costs due to court fees and the additional boarding fees incurred as a result of the dog being held whilst ownership is determined.</p>	16	Requires Attention	<p>The agreement with Hilbrae Pet's Hotel should be updated to include details of the action that should be taken if a banned breed of dog is collected as a stray. This should include details of which party will be responsible for the dog. If this is to be Shropshire Council it should be stated in the agreement that the dog will be handed to the police and the Council will accept no liability for costs.</p> <p><b>Completed.</b></p>
6.4	<p>The total estimated cost of the contract with Hilbrae over a period of four years is £57,846 which</p>	<p>Non-compliance with Financial Rules. A potential failure to achieve best value by not</p>	17	Fundamental	<p>Expenditure over £50,000 should be subject to formal tender. The cost of the</p>

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	exceeds the Council's tender threshold. No tender exercise was undertaken prior to this contract being awarded and there is no evidence that quotes from alternative suppliers were obtained.	appointing the most cost effective supplier. Criticism from other providers if they are not given the opportunity to quote for the service.			contract over its whole term should be included when calculating the value. Failure to return to the market at the end of the contract term means that the total payments to the same supplier would be used to calculate the contract value even where the original contract was for 12 months.  Will be going out to tender in 2024.
6.5	It is stated in the agreement with Hilbrae Pet's Hotel that a preferred veterinary group should be used. However, there is no evidence that an appropriate procurement exercise was undertaken prior to selecting the preferred provider.	Value for money products or services not obtained resulting in excessive expenditure being incurred. Criticism from other providers if they are not given the opportunity to quote for the service.	18	Significant	Three written quotes should be obtained for any purchases over £10,000 in value, in accordance with Shropshire Council's Contract Procedure Rules.  The vet costs are unlikely to exceed this, two different vets are currently being used, the SLA states that it is a requirement that the vets used should have either a Vet or Veterinary nurse on site 24hrs when a dog has to stay overnight.
6.6	The October 2017 agreement with	Failure to review poor performance	19	Significant	The performance of the

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	Hilbrae Pet's Hotel includes arrangements for the arbitration of any disputes between the service provider and Shropshire Council. However, no formal arrangements are in place to monitor performance of the service provider.	could result in issues not being rectified in a timely manner Potential for reputational risk if the service provided to the public is not sufficient.			provider of the out of hours dog collection service should be reviewed regularly and any poor performance formally addressed. <b>Quarterly meetings are held between Hilbrae and the Council .</b>
6.7	A review of fifteen invoices provided by Hilbrae Pet's Hotel between April 2018 and May 2019 identified that eight did not include an invoice number.	Non-compliance with HMRC VAT regulations resulting in possible fines against the Council.	20	Significant	Purchase invoices that do not include a unique invoice reference number should not be processed for payment. <b>This is now overseen by the DW.</b>
6.8	The review of 15 invoices identified that there were discrepancies on call out charges on each of the invoices. Several different reasons for these were identified: <ul style="list-style-type: none"> <li>• On most call outs, Hilbrae have charged £5 more than the amounts included in the 2017 agreement;</li> <li>• There were several discrepancies on mileage calculations, however this may partly be due to the exact location not being recorded;</li> <li>• Several call outs have been included on call out sheets for which no stray dog sheets were provided. This may be due to no dogs being present when an officer attended, or</li> </ul>	Failure to verify amounts charged could result in incorrect charges being made leading to a financial loss to the Council.	21	Significant	All invoices should be checked to the information held on Confirm and checked for accuracy prior to being processed for payment. This should include: <ul style="list-style-type: none"> <li>• Confirming that all call out fees are in accordance with the contract;</li> <li>• Confirming that all mileage has been calculated accurately, and that exact locations have been recorded in order to verify this; and</li> <li>• Ensuring that explanations</li> </ul>

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	<p>because the dog was returned directly to the owner without being taken to the kennels. However, this is not evident from the information provided;</p> <ul style="list-style-type: none"> <li>• One occasion where the time is not recorded, therefore it is not possible to ascertain what call out fee should have been charged;</li> <li>• The breakdown of call out fees and mileage were not recorded on invoices for the North, therefore it was not possible to calculate how the discrepancies occurred.</li> <li>• Furthermore, it is stated in the agreement with Hilbrae Pet's Hotel that the amount to be reimbursed for vaccinations is £15. However, the review of invoices identified that this was being charged at £30 for the North. No explanation for this was available. Whilst it was also identified that the price for other areas is being charged at £16.25, it is accepted that this small adjustment may be due to price increases.</li> </ul>				<p>for charges are included when stray dog sheets are not provided.</p> <p>Invoices should be reviewed prior to payment to ensure that the amount charged for vaccinations is in accordance with the contract agreement.</p> <p>Where discrepancies are identified these should be queried with the provider. Where errors are consistently identified this should be managed accordingly as part of performance monitoring.</p> <p><b>This is now overseen by the DW and all forms are checked for accuracy and this is recorded on the SDR. The SD/call out form and the call out sheet are now on one form .</b></p>
6.9	The review of Hilbrae invoices identified that in October 2018 the amount collected in fines on the	Income due to the Council is not collected resulting in a financial loss.	22	Significant	The agreement with Hilbrae Pet's Hotel should be updated to state that when a

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	<p>Council's behalf for the South area was £25 less than expected. This was due to a breeder not being charged for a dog returned to them, however there is no evidence that this was authorised by a representative of the Council.</p>				<p>dog owner is not charged in accordance with the Council's approved fees this should be authorised by a representative of the Council. This should be recorded on the stray dog sheet by Hilbrae as evidence of the authorisation and should be recorded on Confirm by the Council representative.</p> <p>All information is now recorded on the SDR and the SD/call out forms.</p>
6.10	<p>The review of invoices identified that stray dog sheets are often not completed in full. This relates mainly to the method and date of disposal. Additionally, on one occasion the time that the dog was taken to kennels was not recorded, therefore it was not possible to calculate the expected call out charge. Furthermore, two invoices were provided with no supporting documents. It is accepted that that there may have been no dogs present when the officer attended the site, or that the dogs were</p>	<p>It is not possible to confirm that charges are accurate if stray dog sheets are not completed in full, resulting in possible overpayments.</p>	23	Significant	<p>Hilbrae Pet's Hotel should be reminded that all stray dog sheets should be completed in full, and that failure to action this may result in payment not being made. Where no stray dog sheets are available explanations for the charges made should be provided.</p> <p>A new SD/call out form is now in use and these are checked by the DW to ensure all the relevant</p>

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	returned to owners without being taken to kennels. However, this cannot be confirmed as no information was provided.				information is recorded before updating the SDR.
6.11	The review of invoices and supporting stray dog sheets identified four occasions where charges of £25 made to owners were included on the sheets as 'kennelling fees', however it is not clear what these relate to. It was suggested by the Dog Warden that this may be as a result of staff at Hilbrae staff becoming confused between the charges set by Shropshire Council and those set by Telford and Wrekin, but this cannot be confirmed. There is no evidence that these amounts of £25 were paid over to Shropshire Council.	Loss of income.	24	Requires Attention	Investigations should be taken as to what has been charged to dog owners when income is analysed as 'kennelling fees' on stray dog sheets. If it is identified that this is income due to Shropshire Council action should be taken to recover it.  Invoices and the SD/call out forms are now checked by the DW for accuracy.
6.12	A review of fifteen recharges for vets costs identified that of 33 charges for vaccinations, 10 were carried out more than seven days after the dogs arrival at kennels. Therefore, the Council was no longer responsible for the dogs. A further 14 vaccinations were identified as being carried out more	Failure to review vets bills could lead to the Council paying costs for which it is not responsible leading to a financial loss.	25	Significant	Recharges for vaccinations should be reviewed prior to payment to ensure that these are carried out after three days of dogs arriving at kennels. Where it is identified that vaccinations are carried out more than seven days after the date of

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	than three days after the dog arrived at kennels but within seven days.				arrival payment should not be made as the dog is no longer the responsibility of the Council. <b>This is now overseen by the DW and all paperwork is thoroughly checked prior to goods receiving any invoices.</b>
6.13	A review of 15 recharges for vets' bills identified eight charges for treatments other than vaccinations. There was no evidence of any of these being authorised by a representative of the Council.	Inappropriate or excessive expenditure if costs are not authorised prior to treatment being undertaken.	26	Significant	Hilbrae Pet's Hotel should be reminded that any veterinary treatment required should be authorised by a representative of the Council. This authorisation should be recorded on Confirm at the time that it is granted and should be checked prior to payment being made. Where it is identified that authorisation was not sought or granted the invoice should not be paid or should be approved by a more senior budget holder. <b>SC now requires evidence from the Vet (unless an emergency) before treatment. The information</b>

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					inc who authorised the treatment is recorded on the SDR, with a confirm case Ref No, this information is not recorded on Confirm as the Confirm case is only relevant to the customer not the dog.
6.14	A review of 15 vets recharges identified that one charge for £322.31 was invoiced by Hilbrae twice. This was not identified by the invoice processor or authoriser prior to payment being made. Furthermore, five charges were identified that related to dogs that were returned to their owners. Therefore, the vets fees should have been recharged to the owners rather than the Council.	Financial loss in the event that duplicate payments are made.	27	Significant	All invoices should be checked prior to payment to ensure that charges are not duplicated. Consideration should be given to recording the amounts charged for individual dogs on Confirm, in order that duplicates can be easily identified. Care should be taken to ensure that payments are not made for dogs that are returned to their owners. Consideration should be given to recovering these overpayments from Hilbrae Pet's Hotel. All Invoices are now checked by the DW prior to goods receipting.



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6.15	It is stated in the October 2017 agreement with Hilbrae Pet's Hotel that the Council will pay a proportion of the call out fee if vaccinations are performed at the kennels. However, a review of the recharges for vets fees identified that the Council is being charged the full amount.	Failure to specify the amount that will be paid for vet's call out fees leads to confusion over the amount that should be recharged leading to financial loss.	28	Requires Attention	It should be clarified what proportion of call out fees the Council will pay when vaccinations are carried out at the kennels. Following this decision, it should be ensured that only the agreed amount is reimbursed to Hilbrae Pet's Hotel. <b>Completed.</b>
<b>Management Control Objective: Disclosure and Barring Service (DBS) checks have been performed for relevant staff.</b>					
7.1	The Dog Warden advised that a CRB check was performed when she started in her current role, however Human Resources do not hold a record of this.	There is no evidence that DBS checks have been performed.	29	Significant	If details of the Dog Warden's CRB or DBS check cannot be located a new check should be performed. <b>Incomplete, A request has been put to HR for this to be done.</b>
<b>Management Control Objective: Adequate management information is obtained and reviewed at an appropriate level.</b>					
8.1	There are no arrangements in place for the performance management of Dog Warden activities and performance reviews are not undertaken for members of the Street Scene Team. Furthermore, the Dog Warden has not received any formal training in relation to the role.	Staff are unaware of their work targets and how to achieve those goals leading to loss of productivity and not meeting the team or corporate aims and objectives.	30	Requires Attention	Performance targets for Dog Warden activities should be agreed upon and performance monitored against these.  Performance reviews should be undertaken for all Street Scene employees, including the identification of any

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					training requirements.
8.2	Dog Wardens does not have a separate cost centre; therefore it is not possible to monitor the budget effectively as all income and expenditure is grouped within Street Scene.	Failure to monitor the budget could result in variances not being identified and action not being taken to address these.	31	Significant	Consideration should be given to setting up separate cost centres for the different services within Street Scene to allow for effective monitoring of the budget. Following this, the budget should be monitored on an ongoing basis to identify any variances.
8.3	The working arrangements for the Dog Warden have recently changed, whereby she must now return the Council's vehicle at 5pm each day. As a result of this the Dog Warden will be unable to attend certain calls towards the end of the day depending on the location and these would be referred to Hilbrae Pet's Hotel, incurring additional costs. Furthermore, the Dog Warden is now splitting her time between Dog Warden duties and Street Scene Officer duties. Therefore, if she is elsewhere in the county responding to Street Scene queries it may be necessary for	Increased costs to the Council if Hilbrae are used at times that the Dog Warden is not available during her usual working hours.	32	Significant	<p>A review of the Dog Warden's working arrangements should be undertaken to ascertain whether resources are effectively utilised. This should include identifying the impact on the number of call outs that Hilbrae are now required to undertake and whether this is cost effective.</p> <p>DW now back on DW duties. Hilbrae contracted to collect 24/7 to allow the DW to undertake preventative work</p>

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	Hilbrae to attend call outs. This also reduces the time that the Dog Warden has to undertake preventative work in relation to dog fouling.				in relation to dog fouling for the entire County.
<b>Management Control Objective: Information / data processing risks are managed appropriately.</b>					
9.1	The Street Scene Manager is unsure as to whether a risk assessment for personal and sensitive data has been completed.	Information security may be overlooked leading to a loss of personal data and/or misuse of personal data resulting in embarrassment to the Authority, distress to the individuals involved, non-compliance with GDPR and a security breach registered with the Information Commissioner's Office resulting in fines against the Council.	33	Significant	A risk assessment should be completed for all personal data collected as part of reports relating to Dog Warden activities.  Completed annually.
9.2	Data Protection training has not been completed by the Street Scene Manager, the Dog Warden or the Senior Administration Officer. It has not been possible to ascertain whether training has been completed by an Administration Officer (202366).	Potential data breaches if staff are not aware of their responsibilities leading to fines against the Council.	34	Significant	Data Protection training should be completed by all members of the Street Scene team.