

Report to Audit and Governance Committee 18/11/2019 on actions taken in relation to key recommendations made in the audit report relating to the audit of Shopmobility Fees and Charges

Lead Officer: Jonathan Lund (Corporate Director)

Presenting officer (if different to above):

Summary of Audit Area

Shopmobility provide battery powered scooters, wheelchairs, battery chairs, power chairs and rollators to help people who have limited mobility.

Charges were introduced in 2012 and remained unchanged until February 2018, when Cabinet agreed to adopt a new 'fees and charges' structure for the service effective from April 2018 in order to make the arrangements in place to be more commercially focussed. Shopmobility collected approximately £24k of income in the 2018/19 financial year.

Summary Terms of Reference of the Audit

The overarching objective of the audit is to ascertain details of the registration process, hire fees charged, equipment maintenance and the processing of personal information relating to the services provided by Shopmobility. In particular that:

- Service user data and records are appropriately held and used in accordance with the requisite guidelines;
- Any equipment hired is in good working order, and training is provided to the user where applicable; and
- Arrangements are in place to assess, apply, collect and account for the correct fees charged to service users.

Risks

- Income due is not collected;
- Income due is not banked and accounted for;
- Users of the service are not appropriately trained / Misuse of equipment;
- Accidents occur due to poorly maintained equipment;
- Personal data is not stored securely / misused;
- Injury to user / member of the public;
- Damage to reputation/fraud;
- Financial penalties if personal data is misused/made public; and Liability claims received from members of the public.

Key Findings

Service User Data

- Users complete a membership registration form i.e annual or occasional. Both forms are designed to collect personal identifiable information required for the user to complete a hire agreement;
- Data collected is held in electronic and hard copy formats, and respectively locked in a filing cabinet or on a secure server. However, from review of the records it was highlighted that:
 - They are inconsistently updated and the service is collecting data that is surplus to that required for a hire agreement;
 - The service does not provide a link to the Council's Privacy Notice on the user registration forms; and
 - The service does not routinely review the data held and delete data that is no longer required after two years of non-participation in the Shopmobility Membership Service.

Equipment Hired

- The equipment available for hire from Shopmobility is donated by members of the public or from the Friends of Shopmobility;
- Apart from an initial inspection/service, any repairs are made on a reactive basis, instead of a planned maintenance/servicing schedule; and
- Because a maintenance log book is not maintained for each piece of equipment a comprehensive service history is not readily available in the event of an incident and subsequent claim being received.

Service User Training

- Prior to any equipment being used, the Shopmobility assistants provide appropriate training if the user is new to the service and/or the equipment hired; and
- Whilst training/familiarisation is provided to the service user, the requirement to document this process is inconsistently completed.

Income Collection

- Income generated by donations and bric a brac sales are collected as and when a purchase or donation is made at varying amounts, with long term hire, annual membership and day rate charges being applied as per the Council pricing in effect from 1st April 2018;
- Income is collected via both cash and wireless card terminal methods; and
- Income documents in the form of till receipts are not retained in line with the Council Retention Schedule and HMRC guidelines.

Action taken as at 30/09/2019 and/or proposed

Recommendation 1

The service completes a Privacy Impact Assessment in consultation with the Council Data Protection Officer to systematically analyse, identify and minimise the data protection risks of Shopmobility data processing. Following completion, clear guidance is provided to staff operating the service regarding data collection and retention.

Original management response:

The Visitor Experience Manager will liaise with One Legal to ensure compliance across all areas of the service.

Management update as at 30/09/2019:

Done - The Visitor Experience Manager has met with One Legal to produce a PIA. Potential risks were identified and have since been mitigated.

Recommendation 2

Service user registration forms:

- The service user registration forms are amended to include a link to the Council Privacy Notice; and
- The occasional user registration form is amended to reflect the Council Retention Schedule statement that user data will be destroyed after one year of non-participation.

Original management response:

The Visitor Experience Manager will liaise with One Legal to ensure compliance across all areas of the service.

Management update as at 30/09/2019:

Done - Both registration forms have been amended to include a link to the Council Privacy Notice.

The Occasional User form now follows the Membership form where data will be kept for 2 years after non-participation. Staff feedback showed that many occasional users do return to the service every year.

Recommendation 3

The service ensures that equipment available for hire is subject to planned maintenance checks; the frequency of which is to be determined by a competent provider and the Council's insurers

Original management response:

Shopmobility staff will liaise with the service/maintenance provider to assess costs and timescales in ensuring that the fleet is serviced on an annual basis. Once the assessment is complete, budget will be identified and allocated followed by a planned service programme of the fleet

Management update as at 30/09/2019:

Done - All scooters are serviced upon receipt and are now subject to an annual service with records kept in a new service history folder. Annual service of the current fleet will cost in the region of £2500 and will be allocated at the start of each financial year. 50% of the fleet has already received its annual service.

Recommendation 4

A service log book is maintained for each item subject to hire to track the maintenance history, service use and required maintenance requirements.

Original management response:

A service log book has now been created which will clearly identify each item of equipment and its service history.

Management update as at 30/09/2019:

Done - A service log book is now in place to monitor all maintenance for each scooter in the fleet.

Recommendation 5

The service manager is to ensure that all standard documentation is being completed to the required level, and a reminder is issued to the assistants of the importance of ensuring training records are completed.

Original management response:

Following a team meeting on the 3rd July, the team agreed that regular users would be trained on initial arrival followed up by annual refresher training (normally at the time of membership renewal).

The customer signs a form each time they are trained and is countersigned by the member of staff providing the training.

Management update as at 30/09/2019:

Action completed.

Recommendation 6

To review current membership data records with a view to:

- Removing duplication; and
- Agreeing which primary records should be maintained and consistently updated by all team members.

Original management response:

The service suffers from ad hoc computer issues meaning that they cannot rely solely on electronic records.

The apparent undercharging was due to membership records not being kept up to date. Members were charged the correct amount but staff relied on their

knowledge instead of the main database. The Visitor Experience Manager will identify a better method of collecting data to ensure that staff are referring to the most up to date user information.

Management update as at 30/09/2019:

Done - The membership database has been checked for duplicates and is only collecting data which is required by the service. The data is reviewed every 3 months.

Recommendation 7

The Shopmobility Service retain till rolls in accordance with the Council Retention Schedule and HMRC guidance.

Original management response:

N/B – Shopmobility uses a manual stand-alone till.

Prior to this audit, on the 8th May 2019, cashiers no longer accepted Shopmobility money and a new system was set up where money is now deposited through the till at the Museum of Gloucester.

A deposit form is filled out to enable Museum staff to quickly process the money which lists each service that Shopmobility offers. A receipt is printed upon completion and is attached to the deposit form. The till roll receipt from the manual till is also attached.

Following a staff meeting on the 3rd July, it was identified that the team had been told that it wasn't necessary to keep till rolls as finance kept records. The Visitor Experience Manager explained to staff that financial records will need to be kept for 6 years, plus the current year.

Management update as at 30/09/2019:

Action completed.