Hertfordshire County Council
Internal Audit Progress Report
11 September 2017

Recommendation

Members are recommended to:

- Note the Internal Audit Progress Report
- Agree changes to the audit plan

Contents

1. Introduction and Background

1.1 To provide Members with information on the position as at 14 August 2017, relating to:

a) Progress made by the Shared Internal Audit Service (SIAS) in delivering the Hertfordshire County Council Internal Audit Plan for 2017/18

b) Proposed amendments to the approved 2017/18 Audit Plan

c) 'Limited Assurance' audits issued since the last meeting of this Committee of which there are none in this reporting period.

d) Implementation status of previously agreed:

- high priority audit recommendations and agreement to remove completed actions; and
- medium priority recommendations

e) An update on performance management information.

Background

1.2 The 2017/18 Hertfordshire County Council Audit Plan was approved by the Audit Committee on 1 March 2017.

1.3 The Audit Committee receives periodic progress updates against the Internal Audit Plan and this is the second update report for the 2017/18 financial year.

1.4 The work of Internal Audit is required to be reported to a Member Body so that the Council has an opportunity to review and monitor an essential component of corporate governance and gain assurance that its internal audit provision is fulfilling its statutory obligations. It is considered good practice that progress reports also include proposed amendments to the agreed annual audit plan.

2. Audit Plan Update

Delivery of Audit Plan and Key Audit Findings

2.1 As at 14 August 2017, 28% of the 2017/18 Internal Audit Plan days had been delivered (calculation excludes unused contingency days). Appendix A to the report provides a status update on each individual deliverable within the audit plan.

2.2 The following reports have been issued and assignments undertaken in the period since 12 June 2017 which was the cut off period for the previous report that was brought to the Committee in July:

Audit Title	Assurance Level	Number of Recommendations
2016/17 Audit Plan		
Resources		
Working Time Directive and Overtime	Substantial	1 Merits Attention
Training Records	Substantial	3 Merits Attention
Adult Care Services (ACS)		
Client Finances – Establishment Visits	Substantial	4 Medium
Learning Disability Panel Processes	Moderate	1 Medium 3 Merits Attention
Children's Services		
Ofsted Action Plan Progress	Substantial	1 Medium 2 Merits Attention

Audit Title	Assurance Level	Number of Recommendations
2017/18 Audit Plan		
Resources		
DBS & Risk Assessments	Moderate	2 Medium 1 Merits Attention
Employee Expenses	Substantial	4 Merits Attention
Grant Certification / Statutory Submissions		
LEP – Capital Grant	Unqualified Opinion	No Recommendations
Carbon Reduction Commitment	Unqualified Opinion	No Recommendations

2.3   In addition to the above, the following draft reports have been issued to management for comment and response:

Service	Audit Title	Month of Issue
2016/17 Audit Plan		
Adult Care Services (ACS)	Pre-Paid Cards	July 2017
2017/18 Audit Plan		
Resources	Early Years Payment Run Processes	July 2017

2.4   There are three reviews remaining for completion from the 2016/17 audit plan. Draft reports are expected to be issued for both the SIAS Partnership Joint Review of PREVENT and the Ringway Contract (Sector Specific Improvements) prior to the date of this committee meeting. The remaining audit, a SIAS Partnership Joint Review of Trading Activities, is currently at audit planning stage.

2.5   In respect of the 2017/18 audit plan work has progressed on the quarter two allocation with eight audits currently in fieldwork and another 12 at planning or terms of reference stage.

Schools' Audit Activity

2.6   All activities within the 2016/17 Schools Plan have been completed.

2.7   The schools' audit plan for 2017/18 identified three streams of activity:

a) **Theme 1** - Assessment of the effectiveness of internal control in relation to the requirements of the Schools Financial Value Standard (SFVS) (sample of 25 schools)

b) **Theme 2** – Safe Recruitment – to provide assurance that the sample schools comply with the statutory guidance in the Department for Education's publication "Keeping Children Safe in Education" and the Home Office Right to Work in the UK legislation, when undertaking recruitment activity (sample of 18 schools)

c) **Theme 3** – IR35 – to provide assurance that the sample schools are complying with the new IR35 (off payroll working) regulations that came into force in April 2017 (sample of 15 schools)

2.8 In respect of Theme 1, visits to all sampled schools have now been completed and 14 final reports have been issued. Of the remaining schools nine are at draft report stage and the remaining two audits are at quality review stage.

2.9 At the request of Children's Services an additional two schools were added to this theme, with one visit completed to draft report stage and a visit date booked for the remaining school.

2.10 In respect of theme 2 (Safe Recruitment in Schools) visits have now been booked for the Autumn term (commencing September 2017) for eighteen sampled schools. For theme 3 (IR35 compliance) contact will be made with schools to agree visit dates at the start of the autumn term.

2.11 To date we have not received any referrals for inclusion under the contingency allocation for schools due to become academies.

2.12 We continue to receive enquiries from schools regarding a range of financial matters and update the Frequently Asked Questions within the Internal Audit page on the Grid accordingly.

Proposed Audit Plan Amendments

2.13 Proposed amendments to the 2017/18 Internal Audit Plan and the reasons for these are set out below:

2.14 Resources & Children's Services

- At the request of the Assistant Director (Improvement & Technology) and supported by the Director of Children's Services, an audit on compliance with the General Data Protection Regulations (GDPR) has been added to the plan. This audit will focus on the area of electronic transfer of sensitive data within Children's Services. An initial budget of 10 days has been allocated to this audit.

- At the request of the Assistant Director (Finance) a review of the processes related to payments to Early Years providers was added to the plan and this five day review has now been completed to draft report stage.

2.15 Adult Care Services

- In agreement with the Assistant Director (Planning and Resources), the consultancy support project on gross payments to Residential Homes has been cancelled as the project has now reached business as usual stage. The remaining allocation of four days has been returned to the Hertfordshire County Council contingency budget.

2.16   Further changes have been made to the plan to accommodate additional time required for the completion of the remaining 16/17 audits, the 17/18 DBS and Risk Assessments Audit and Market Oversight Consultancy review. These changes total 10 days.

2.17   In respect of the plan changes above this has been resourced from the Council's audit plan contingency allocation, leaving a remaining contingency balance of 38.5 days.

2.18   Additional minor changes have been made to the audit plan in order to reflect changes of 2 days or less, where original planned items are no longer required, or new activities have emerged.

Limited Assurance Audits

2.19   Since the previous progress report no Limited Assurance opinions have been provided by SIAS.

High Priority Recommendations

2.20   Members will be aware that a final audit report is issued when it has been agreed by management; this includes an agreement to implement the recommendations made. It is Internal Audit's responsibility to advise Members of progress on implementation of high priority recommendations; it is the responsibility of Officers to implement the recommendations by the agreed date.

2.21   An update on progress with implementing high priority recommendations is shown at Appendix B to the report. Progress is summarised in the table below:

HIGH PRIORITY RECOMMENDATIONS				Not implemented by Due Date	
Total Number of Outstanding Recommendations at the start of this Follow Up Period	Implemented	Not Yet Due	No Longer Applicable	Partially Implemented – Revised Date Agreed	No Update Provided by Action Owner
2	0	1	0	1	0
%	0%	50%	0%	50%	0%

2.22   High priority recommendations relating to schools are excluded from this listing given both the volume of schools within the County and the relative risk of any single recommendation to the Authority as a whole.

2.23   Further details on the implementation status of the above management actions are provided within Appendix B of this progress report.

2.24   No new high priority recommendations have been made since our previous progress report to the Committee.

2.25   The current progress of management in implementing the above actions is reported to the committee within Appendix B of this report.

Medium Priority Recommendations

2.26   The Committee's role in respect of medium priority recommendations is to be satisfied that there is a monitoring process in place and that, in general, agreed recommendations are being implemented.

2.27   The table below details the implementation status of medium priority recommendations that were due for implementation in the period since the last progress report.

MEDIUM PRIORITY RECOMMENDATIONS		Not implemented by Due Date		
Total Number of Recommendations Followed Up in this Period	Implemented	Partially Implemented – Revised Date Agreed	Actions not commenced – Revised date Agreed	No Update Provided by Action Owner
30	15	15	0	0
%	50%	50%	0%	0%

Performance Management

2.28 Annual performance indicators and associated targets are approved by the SIAS Board on an annual basis.

2.29 The actual performance for Hertfordshire County Council against the targets that can be monitored in year is set out in the table below.

Performance Indicator	Performance Target for 31 March 2018	Profiled performance at 14 August 2017	Actual performance to 14 August 2017
1. Planned Days – percentage of actual billable days against planned chargeable days completed (excludes unused contingency)	95%	33%	28%
2. Planned Projects * – percentage of actual completed projects to draft report stage against planned completed projects	95%	35%	30%
3. Client Satisfaction – percentage of client satisfaction questionnaires returned at 'satisfactory' level	100%	100%	100%**
4. Number of High Priority Audit Recommendations agreed as %	95%	95%	100%

* Based on audit plan 'deliverables' at draft, final and audit closed stage including schools audits and items carried forward from 2016/17 that were not at draft report stage by 31 March 2017.

** six completed customer satisfaction surveys have been received during 2017/18, four of which relate to audits completed from the 2016/17 audit plan.

2.30 In addition, the performance targets listed below are annual in nature; Members will be updated on the performance against these targets within the separate Head of Assurance's Annual Report:

- **5. External Auditors' Satisfaction** – external audit has been able to draw assurance from the work of internal audit on relevant matters.

- **6. Annual Plan** – prepared in time to present to the March meeting of each Audit Committee. If there is no March meeting then the plan should be prepared for the first meeting of the financial year.

- **7. Head of Assurance's Annual Report** – presented at the June meeting of the Audit Committee.

APPENDIX A   PROGRESS AGAINST THE 2017-18 AUDIT PLAN AS AT 14 AUGUST 2017

Hertfordshire County Council Audit Plan 2017/18

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Corporate								
Annual Governance Statement 2016/17	N/a				8	SIAS	8	Complete
Annual Governance Statement 2017/18	N/a				5	SIAS		Allocated
Head of Internal Audit Opinion 2016/17	N/a				5	SIAS	5	Complete
Whistleblowing - named contact and quarterly review	N/a				4	SIAS	2	Through Year
Resources								
Resources Queries < 3hrs Activities	N/a				10	SIAS	2.5	Through Year
Resources: Hertfordshire Business Services (HBS)								
Business Operations					25	SIAS	4	TOR Issued
Resources: Finance								
Pensions - Administration					30	SIAS		Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Payroll					25	SIAS	0.5	In Planning
Debtors					25	SIAS		Allocated
Creditors					25	SIAS		Allocated
General Ledger					20	SIAS		Allocated
Treasury Management					15	SIAS	0.5	In Planning
eIncome					15	BDO	0.5	In Planning
Resources: Property								
Carbon Reduction Commitment	Unqualified Opinion	0	0	0	15	SIAS	15	Final Report Issued
Resources: Technology								
Segregation of Duties / Access Controls					20	BDO		Allocated
Cyber Security					15	BDO	3.5	In Planning
Resources: Human Resources								

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Employee Expenses	Substantial	0	0	4	15	SIAS	15	Final Report Issued
Off Payroll Working (consultancy)					5	SIAS	1	Through Year
DBS and Risk Assessments	Moderate	0	2	1	10	SIAS	10	Final Report Issued
Resources: Legal, Democratic & Statutory Services								
LEP - Compliance with Assurance Framework					15	SIAS	8.5	In Fieldwork
Resources: Customer Engagement & Libraries								
Blue Badges					10	SIAS	9	In Fieldwork
Council Wide Reviews								
Conflicts of Interest					25	SIAS	2	In Planning
Delegated Decision Making					25	BDO		Allocated
Volunteering					25	SIAS	3.5	In Planning
Business Continuity					25	SIAS	2	In Planning

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Serious and Organised Crime Audit					25	SIAS	3.5	In Planning
Safeguarding					25	SIAS		Allocated
Cross Service Reviews								
0-25 Integrated Service (Children's Services and Adult Care Services)					20	BDO		Allocated
Home to school / college transport (Children's Services and Environment)					15	SIAS	5	In Planning
Transport Infrastructure Assets (Resources and Environment)					15	SIAS	1	In Planning
Early Years Payment Run Processes					5	SIAS	5	Draft Report Issued
Adult Care Services								
Deputyship / Appointeeships					15	SIAS	5	In Fieldwork
Integrated Commissioning Arrangements					15	BDO		Allocated
Application of Eligibility Thresholds (Older People Service & Adult Disability Service)					20	BDO		Allocated
Data Security and Information Sharing					15	SIAS		Allocated
Direct Payments					15	SIAS		Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Provider Portal (Consultancy Advice)					5	SIAS	0.5	Through Year
Data quality - Business Process Compliance – Older People Service					20	BDO	3.5	TOR Issued
Demography & Budget monitoring - Adult Disability Service					20	BDO		Allocated
Payment of homes gross - Consultancy Support					1	SIAS	1	Cancelled
Accommodation for Independence Programme (Adult Disability Service)					15	BDO		Allocated
Adult Care Services Queries < 3hrs Activities	N/a				10	SIAS	2.5	Through Year
Market oversight programme – consultancy activity / advice					15	SIAS	11	In Fieldwork
ACS Client Finances (Older People Service)					5	SIAS	3	In Fieldwork
Environment Services								
Bus Contracts					15	SIAS	1.5	In Planning
Dropped Kerbs					12	SIAS	10.5	In Fieldwork
Highways Service - Highways Act 1980 Section 58					15	BDO	0.5	TOR Issued
Highways Service - Category 3 Works					15	BDO		Allocated
Highways Services - PMnet Software Development Project					10	SIAS	2.5	In Fieldwork

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Development Management - Enforcement					15	SIAS		Allocated
Compliance with CDM Regulations					15	SIAS	0.5	In Planning
Environment Services Queries <3hrs activities	N/a				10	SIAS	2.5	Through Year
WAMS (Waste Management System) - Consultancy Advice					3	SIAS		Through Year
Children's Services								
Programme / Project Management					20	BDO	1.5	In Planning
Financial Monitoring of Schools					15	SIAS	1	TOR Issued
Family Finding model					5	SIAS		Through Year
Quality Assurance Systems (Consultancy)					10	SIAS	0.5	In Planning
Customer Service Centre (safeguarding enquiries)					20	SIAS		Allocated
Children's Services Queries <3hrs Activities	N/a				10	SIAS	4.5	Through Year
GDPR – Transmission of Sensitive Data					10	SIAS	10	In Fieldwork
Public Health								

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Commissioning, Contract Management and Contract Payments					20	BDO	1	TOR Issued
Immunisation in Schools					0.5	SIAS	0.5	Audit Cancelled
Community Protection								
Service Performance Management					15	BDO		Allocated
Internal Quality Assurance Arrangements					15	SIAS	0.5	In Planning
Trading Standards - Management of Evidence					10	SIAS	1.5	In Planning
Shared Learning								
Shared Learning Newsletters and Summary Themed Reports	N/a				5	SIAS	0.5	Through Year
Joint Review					5			Not Yet Allocated
Grant Claims								
Herts Chief Finance Officers Society	Unqualified Opinion	0	0	0	2	SIAS	2	Final Report Issued
Hertfordshire Education Foundation					2	SIAS		Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Hertfordshire Charity for Deprived Children	Unqualified Opinion	0	0	0	1	SIAS	1	Final Report Issued
Autism Grant					2	SIAS		Allocated
LEP - Local Growth fund	Unqualified Opinion	0	0	0	3	SIAS	3	Final Report Issued
Integrated and structural maintenance grant					2	SIAS		Allocated
Building Better Opportunities					3	SIAS		Allocated
Disabled Facilities Grants / Home Improvement Agency					5	SIAS		Allocated
Grants Contingency	N/a				6	SIAS		Allocated
LEP Capital Grant	Unqualified Opinion	0	0	0	3	SIAS	4.5	Final Report Issued
Other Chargeable								
Plan Delivery Monitoring	N/a				30	SIAS	5	Through Year
Recommendations Follow-Up - Q1	N/a				5	SIAS	5	Complete
Recommendations Follow-Up - Q2	N/a				5	SIAS	5	Complete
Recommendations Follow-Up - Q3	N/a				5	SIAS		Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Recommendations Follow-Up - Q4	N/a				5	SIAS		Allocated
Client Liaison	N/a				10	SIAS	2.5	Through Year
Audit Committee	N/a				20	SIAS	7	Through Year
2018/19 Audit Planning	N/a				30	SIAS	1.5	Allocated
Performance Data	N/a				3	SIAS	0.5	Through Year
External Audit Liaison	N/a				2	SIAS		Through Year
SIAS Development	N/a				40	SIAS	22	Through Year
SIAS Board Meetings and Preparation	N/a				10	SIAS	3.5	Through Year
Management of Scrutiny	N/a				5	SIAS	2.5	Through Year
Management of Health & Safety	N/a				5	SIAS	1	Through Year
Management of Shared Anti-Fraud Service	N/a				5	SIAS	1.5	Through Year
Management of Risk Management and Insurance	N/a				5	SIAS	1.5	Through Year
Public Sector Internal Audit - Self Assessment 17-18	N/a				10	SIAS		Allocated

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
16/17 Projects requiring completion								
16-17 Projects requiring completion	N/a				10	SIAS	10	Complete
16/17 Social Media	Substantial	0	0	0	9.5	SIAS	9.5	Final Report Issued
16/17 Client Finances - Establishment Visits	Substantial	0	4	0	12.5	SIAS	12.5	Final Report Issued
16/17 Training Records	Substantial	0	0	3	10	SIAS	10	Final Report Issued
16/17 Ofsted Action Plan	Substantial	0	1	2	7.5	SIAS	7.5	Final Report Issued
16/17 Overtime / Working Time Directive	Substantial	0	0	1	6	SIAS	6	Final Report Issued
16/17 Pre-Paid Cards					8.5	SIAS	8.5	Draft Report Issued
16/17 Joint Reviews					1	BDO	0.5	Quality Review
16/17 Ringway - Service Sector Improvements					1	SIAS		Quality Review
HCC Plan Contingency Balance					**38.5**			
Schools								

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Advice, queries and guidance for schools	N/a				20	SIAS	4.5	Through Year
Liaison, awareness raising and training	N/a				25	SIAS	7	Through Year
Theme 1 - SFVS (25 schools)	N/a				98.5	SIAS	86	Draft or Final Reports Issued
Theme 2 - Safe Recruitment (18 Schools)	N/a				70	SIAS	5	TOR Issued
Theme 3 – IR35 (15 schools)	N/a				27	SIAS	3.5	TOR Issued
16-17 SFVS Returns Collation	N/a				10	SIAS	10	Complete
17-18 SFVS Returns Collection	N/a				5	SIAS	0.5	Allocated
Reporting 16/17 themes	N/a				10	SIAS	2.5	Quality Review
Follow up schools with high priority recs or moderate assurance	N/a				15	SIAS	1.5	In Fieldwork
Unplanned School Audits	N/a				7	SIAS	2	In Fieldwork
Contingency - Schools Causing Concern	N/a				12	SIAS		Through Year
Contingency - Academy Conversions	N/a				6	SIAS		Through Year
Plan Monitoring	N/a				10	SIAS	5.5	Through Year

AUDITABLE AREA	LEVEL OF ASSURANCE	RECS			AUDIT PLAN DAYS	LEAD AUDITOR ASSIGNED	BILLABLE DAYS COMPLETED	STATUS/COMMENT
		H	M	MA				
Completion of 16-17 Audits	N/a				8	SIAS	8	In Progress
Schools Plan Contingency Balance					**21.5**			

Total		**0**	**7**	**11**	**1637**		**442.5**	

Key

H = High Priority
M = Medium Priority
MA = Merits Attention
RECS = Recommendation
BDO = new audit partner, replacing PWC from 1 April 2015
N/A = not applicable

No.	Report Title / Date of Issue	Recommendation / Original Management Response	Responsible Officer / Due Date	Management Comment as at May 2017 (previous commentary added where appropriate)	Status of Progress
1	**HCC Service User Managed Monies** (Final Report Issued February 2015)	**Recommendation** All existing service users that are not currently managed under Appointeeship or Deputyship should be reviewed to ensure that Hertfordshire County Council have the appropriate level of authority based on the level of support being provided. For instances where significant levels of support are provided, appointeeships or deputyships should be used in all cases. If there are subsequent anomalies, these should be fully documented, approved by Senior Management and recorded on the Service User's file. **Management Response** **The review of the area of appointeeships and deputyships will form a specific workstream of this project.** **A key area of review will be determining the responsibilities of Hertfordshire County Council within this area from both a legal and regulatory basis. If it is confirmed that appointeeships and deputyships should be used more widely a full review of existing service users will be undertaken.** **The project will also review how the existing scheme of delegation for approving expenditure for service users ensures that decision making is appropriate to the service user's needs, i.e. decision making is undertaken by those individuals that know the client best.**	Steven Lee-Foster, Assistant Director ACS Provider Services / David Price, Business Development Manager (ACS) 30 September 2015	**August 2017 Update -** The audit of tenant information and role of In House Services is continuing, which includes visiting services to review information held locally in relation to Mental Capacity Act, Care Plans and practice. This work is now reaching a conclusion and will be summarised into a clear action plan shared with Senior Management, Unit Managers, Care Management Teams and Audit.	**Partially Implemented** **Target Date (as reported in July 2017) - End of September 2017**

No.	Report Title / Date of Issue	Recommendation / Original Management Response	Responsible Officer / Due Date	Management Comment as at May 2017 (previous commentary added where appropriate)	Status of Progress
2	**Data Quality (Children's Services)** **(Final Report Issued May 2017)**	<u>Recommendation</u> It was recommended that Children's Services:- - Review the Children's Services Data Oversight Strategy to ensure that it is consistent with the corporate Data Quality Strategy - Formally allocate the Senior Information Risk Owner (SIRO) role to a named officer - Ensure that each information system has a named officer for data quality. - Set a clear target date for the implementation of the Master Data Roadmap/Golden Record project - Set up regular data quality meetings across all departments and with external users - Update the Data Quality Strategy to include information on how data quality is reported through the data governance hierarchy. <u>Management response</u> **Meet with Corporate colleagues to review the recommendations and determine the appropriate response from a corporate perspective.** **Present a report to Children's Services Core Board to review the recommendations and agree proposed actions and owners.** **Develop an action plan following on from decisions taken at Board.**	Jenny Eccles - Head of Business Infrastructure July 2017	**August 2017 Update -** A meeting has taken place with Corporate colleagues and an approach has been agreed. A report will be presented to CS Core Board in September 2017	**Revised Target Date - End of September 2017**

Levels of assurance	
Full Assurance	There is a sound system of control designed to achieve the system objectives and manage the risks to achieving those objectives. No weaknesses have been identified.
Substantial Assurance	Whilst there is a largely sound system of control, there are some minor weaknesses, which may put a limited number of the system objectives at risk.
Moderate Assurance	Whilst there is basically a sound system of control, there are some areas of weakness, which may put some of the system objectives at risk.
Limited Assurance	There are significant weaknesses in key control areas, which put the system objectives at risk.
No Assurance	Control is weak, leaving the system open to material error or abuse.

Priority of recommendations	
High	There is a fundamental weakness, which presents material risk to the objectives and requires urgent attention by management.
Medium	There is a significant weakness, whose impact or frequency presents a risk which needs to be addressed by management.
Merits Attention	There is no significant weakness, but the finding merits attention by management.