

# AUDIT AND RISK MANAGEMENT

## INTERNAL AUDIT REPORT

# BUCKINGHAMSHIRE & MILTON KEYNES FIRE AUTHORITY

## ICT Strategy

March 2014



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**Audit Control:**

<b>Closing meeting:</b>	TBC
<b>Draft report:</b>	25 February 2014
<b>Management responses:</b>	24 March 2014
<b>Final report:</b>	25 March 2014

<b>Auditors:</b>	Rebekah Ibberson	Principal Auditor
	Maggie Gibb	Risk & Insurance Manager
<b>Report Distribution:</b>		
Draft Report	David Tate	Knowledge & Information Services Manager
	David Skinner	Director of Finance and Assets
Final Report as above plus:		Chief Fire Officer Chair, Bucks and Milton Keynes Fire Authority Ernst & Young

## 1. Executive Summary

### 1.1 Overall Audit Opinion

In our opinion **Reasonable** assurance can be provided that relevant risks are effectively identified, managed and controlled.

### 1.2 The overall audit assurance is made up of three supporting judgements:

- a) Our assurance on the adequacy of the risk management techniques employed within the auditable area is **reasonable**. This relates to the extent to which relevant risks have been identified, monitored and managed.
- b) Our assurance on the adequacy of the existing control framework to reduce identified risks to an acceptable level is **reasonable**.
- c) Our assurance on the adequacy of compliance with the existing control framework is **reasonable**.

### 1.3 Following the strategic review, carried out by Cronin Management Consultancy, of Property, Fleet and ICT (June 2012), the business transformation programme for ICT was launched and endorsed in August 2012. An interim ICT Strategy is in place to deliver phase 1 of the Business Transformation Programme October 2012 – March 2013, with a view to updating the strategy by March 2013 and thereafter on an annual basis.

The timescales in the ICT strategy and document itself have not been reviewed in light of the delays in staffing the Knowledge & Information Service and changes in service priorities.

In last year's ICT Strategy audit, the overall audit opinion was Limited. Since then and following the Cronin's review, the ICT service has undergone a restructure with the development of the Knowledge and Information Service (KIS). Despite delays in resourcing KIS, the service have made substantial progress in embedding the new operational model, and are working through the delivery of the authorities priorities as detailed in the ICT Strategy.

### 1.4 In addition to the findings summarised below, we also found the following example of good practice

- The interim ICT Strategy dated March 2013 has been remodelled to deliver the business transformation programme.

### 1.5 Some areas for improvement were identified. Both High recommendations are listed below:

- A monitoring tool should be utilised by the Board to monitor all project activity.

- A Project Management Lead should be in place that provides overall project and programme co-ordination.
- Progress reports should be utilised for all current ICT projects to report on progress against planned timescales and budget, project status (RAG), achievement of milestones, and risks/issues arising.
- The ICT risk register should be reviewed on a more regular basis, at least quarterly.
- The format of the risk register requires review to ensure it meets the Corporate standard, and furthermore, the volume of risks to be included should be reviewed to ensure it is sufficiently focused on the key ICT risks.
- A Data Quality Policy should be in place, approved and made available to relevant personnel.

1.6 Recommendations summary:

In order to provide an assurance on the extent to which the risks identified are managed, our review focussed on the main business objectives within the ICT Strategy.

Progress in implementing these recommendations will be tracked and reported to the Overview & Audit Committee.

Area	Risk	Recommendations		
		High	Medium	Low
ICT Strategy	Timeframes for deliverables are not built into the ICT Strategy.		1	
	There is no overarching monitoring tool to monitor project activity.		1	
	There is no Project Management lead for ICT projects.	1		
	Progress reports are not utilised to monitor ICT projects.	1		
	The person responsible for budgets is not up-to-date.		1	
	ICT risk register is not regularly reviewed and fit for purpose.	1		
Information Governance	Approval of key changes to the organisational structure is not clearly documented in the minutes.			1
Data Quality	There is no Data Quality Policy in place.	1		
<b>TOTAL</b>		<b>4</b>	<b>3</b>	<b>1</b>



The detailed findings are summarised in Section 3 of this report. All findings have been discussed with the Knowledge & Information Services Manager, where relevant, who have agreed the recommendations and produced an action plan to implement them.

- 1.7 There were no aspects of this audit which were considered to have value for money implications for the Authority or which indicated instances of over control. Any relevant findings will have been included in the findings and recommendations section of this report.

## 2. Background

- 2.1 The audit review of ICT Strategy formed part of the agreed audit programme for 2013/14. The review was carried out during quarters 3 and 4.
- 2.2 The ICT Strategy and Implementation area was categorised as high risk as part of the audit needs assessment exercise based on its relative importance to the achievement of the Authority’s corporate objectives. The Authority’s objective for the area is to review the Strategy to provide independent assurance over the controls put in place by Senior Management. The objective of our audit was to evaluate the area with a view to delivering reasonable assurance as to the adequacy of the design of the internal control system and its application in practice. A summary of the scope of this review can be seen in Appendix A.
- 2.3 The outcome of the previous ICT Strategy audit can be summarised as:

Date of last audit:	March 2012
Overall last audit opinion:	Limited
Number of recommendations agreed with Management last audit:	High 5 Medium 3 Low 2
Follow Up at March 2012: Number of recommendations implemented by Management since last audit:	High 4 Medium 2 Low 2
<b>Follow Up at March 2014: Number of recommendations outstanding:</b>	High 1 Medium 1

The outstanding recommendations have been restated in this report.

- 2.4 The outcome of the previous audits in ICT and followed up in the March 2012 ICT Strategy and still outstanding can be summarised as:

Audit name	ICT Health Check Follow Up
Date of last audit:	December 2010
Overall last audit opinion:	Limited
Number of recommendations outstanding:	High 1 Medium 2
<b>Follow Up at March 2014: Number of recommendations outstanding:</b>	Medium 2



Audit name	ICT Governance Follow Up	
Date of last audit:	June 2011	
Overall last audit opinion:	Limited	
Number of recommendations outstanding:	High	4
<b>Follow Up at March 2014: Number of recommendations outstanding:</b>	High	2 <i>These will be followed up as part of the Asset Management Audit</i>

### 3. Recommendations and Action Plan

The control description column details the actual controls that should be established to mitigate identified risk. The Findings & Consequences column details the results of analysis and tests carried out.

The priority of the findings and recommendations are as follows:

- High** immediate action is required to ensure that the objectives for the area under review are met.
- Medium** action is required within six months to avoid exposure to significant risks in achieving the objectives for the area under review.
- Low** action advised within 9 months to enhance control or improve operational efficiency.

	Control description	Findings & Consequences	Recommendation	Priority	Management Response and Action Plan
<b>Key Risk Area</b>		<b>ICT Strategy</b>			
1	Timeframes for deliverables are built into the ICT Strategy.	<p>Following the strategic review of Property, Fleet and ICT reported on the June 2012, the business transformation programme for ICT was launched and endorsed in August 2012. An interim ICT Strategy is in place to deliver phase 1 of the Business Transformation Programme October 2012 – March 2013, with a view to updating the strategy by March 2013 and thereafter on an annual basis.</p> <p>It was intended that the ICT Strategy was to be a dynamic document to be updated annually.</p>	ICT Strategy and project deliverables and timeframes to be reviewed and updated.	Medium	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b> An updated ICT Strategy has been produced and will be submitted to the March 2014 Business Transformation Board prior to being tabled at the April Strategic Management Board and the May Executive Committee. It was scheduled to be submitted to the boards a month earlier, but the April Executive Committee was cancelled.</p>





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	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>The ICT Strategy has not been updated or reviewed since endorsement, and the subsequent restructuring of ICT to the Knowledge and Information Service in July 2013.</p> <p>The delivery of the strategy has been impacted by delays in recruiting staff to the Knowledge and Information Management structure.</p> <p>The timeframes for the ICT Strategy and projects were adjusted, but as appointments never materialised these have not been re-adjusted again. Once the ICT structure is fully staffed then the adjustments to timeframes should be made.</p> <p>Where the ICT Strategy has not been reviewed on an annual basis there is a risk that the framework for project deliverables and timeframes is not in alignment, is out-of-date, or not fit-for-purpose.</p>			<p><b>Who to be actioned by:</b> Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b> March 2014</p>
2	A work plan has been developed to prioritise	A work plan has been developed to prioritise ICT projects and is	The work plan, Gantt charts or similar monitoring	Medium	<b>Recommendation Agreed:</b> Partially



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	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
	ICT projects.	<p>utilised by the Knowledge &amp; Information Services Manager to plan resources.</p> <p>Audit noted that the Business owner, Project Manager and tracking of the delivery of projects to project timescales are not populated on the spread sheet. Projects are monitored individually by Project Managers and reported to the Board. There is no overarching monitoring tool utilised by the Board to monitor all ICT projects.</p> <p>Where there is no overarching monitoring of the strands of project activity, there is a risk that the delivery of the ICT Strategy may slip.</p>	<p>tool should be utilised by the Board as an overarching monitoring tool to monitor all project activity. It should clearly detail the Business Owner and Project Manager for all projects.</p>		<p><b>Response:</b> Current project/programme co-ordinating resource levels restrict the amount of time available to undertake this activity significantly beyond what is currently being done. There is a recognition that more needs to be done in this area and how we resource this is being discussed by the Business Transformation Board along with recommendation 3.</p> <p><b>Who to be actioned by:</b>  Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b>  Progress to be reviewed June 2014</p>
3	There is a Project Management lead for ICT projects.	<p>There is no Project Management lead for ICT projects across the authority. Individual projects are managed by Project Leads who report individually on progress to</p>	<p>A Project Management Lead should be identified who provides overall project and programme co-ordination.</p>	High	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b> This is currently under discussion at the Business</p>



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		<p>the Board. There is no Project Management Lead who monitors the overall governance, progress and slippage of ICT projects.</p> <p>The Knowledge and Information Services Manager has identified and raised the gap in a Project Management Lead to the Board, but there is currently no interim or permanent solution to this issue.</p> <p>Where there is no Project Management lead/co-ordination/monitoring in place, there is a risk that project deliverables may slip, and there is no effective governance to highlight/address the issue which may impact on the delivery of the ICT Strategy.</p>			<p>Transformation Board</p> <p><b>Who to be actioned by:</b></p> <p>Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b></p> <p>Progress to be reviewed June 2014.</p>
4	<b>Expected control:</b> Standard project methodology is utilised to monitor ICT projects.	Standard project methodology is not followed for monitoring ICT projects. Gantt charts or a similar tool (as developed by the KIS Manager, see finding 2) are not utilised to monitor all ICT projects across the authority and the amount of work done and completed in relation to the amount planned for those	See recommendation in finding 2.  Progress reports should be utilised for all current ICT projects to report on progress against planned timescales and budget, project status (RAG), achievement of milestones, and	High	<b>Recommendation Agreed:</b> Partially  <b>Response:</b> Progress reports are utilised for ICT projects where their size and complexity warrants it and examples of this have been provided during the Audit. It is Management's view that to apply this level of



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	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>periods.</p> <p>Furthermore, we noted that project progress reports are not provided to the Business Transformation Board detailing progress on each current ICT project. As such, it is not possible to ascertain progress/slippage on project milestones, deliverables and timescales.</p> <p>Despite the projects reviewed at the time of audit not being “large” projects, and not of a sufficient size to warrant the application of full project methodology, there is an absence of overarching project monitoring mechanism to mitigate the risk stated below.</p> <p>Where progress reports are not utilised, there is a risk that the overarching governance of projects is weak and may result in inadequate challenge should projects slip, overspend, and/or do not deliver project objectives.</p>	risks/issues arising.		<p>project reporting to all projects, including smaller/less complex projects would be disproportional. Never the less, management accept that the Service would benefit from greater levels of project reporting. As noted in the findings, this is related to recommendation 2 and also relates to recommendation 3.</p> <p><b>Who to be actioned by:</b></p> <p>Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b></p> <p>Progress to be reviewed June 2014.</p>
5	Budgets are in place for capital projects.	From review of the ICT revenue and capital budgets we noted that two of the revenue cost centres, in the person	The person responsible field will be updated with the cost centre manager.	Medium	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b></p>



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		<p>responsible field had an officer who has now left the authority and requires updating. One of these cost centres is overspent.</p> <p>Where the cost centre manager in SAP is not up-to-date there is a risk that there is no clear accountability and monitoring of the budgets.</p>			<p>This will be done</p> <p><b>Who to be actioned by:</b> Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b> April 2014</p>
6	ICT risk register is in place.	<p>From review of the ICT risk register we noted that it does not follow the same format as the Corporate risk register in terms of the following:</p> <ul style="list-style-type: none"> <li>- Frequency of review: the ICT risk register is reviewed every 6 months, whereas the Corporate risk register is reviewed monthly at Strategic Management Board and quarterly at the Performance Management Board and CFA Overview and Audit Committee.</li> <li>- Format: unlike the Corporate risk register, the ICT risk register does not state the</li> </ul>	<p>The ICT risk register should be reviewed on a more regular basis, at least quarterly.</p> <p>The format of the risk register requires review to ensure it meets the Corporate standard, and furthermore, the volume of risks to be included should be reviewed to ensure it is sufficiently focused on the key ICT risks.</p>	High	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b> This will be done</p> <p><b>Who to be actioned by:</b> Knowledge and Information Service Manager</p> <p><b>When to be actioned by:</b> April 2014</p>

	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>responsibility/owner of the risk, the consequences if the risk occurs, and the risk RAG rating.</p> <ul style="list-style-type: none"> <li>- Volume of risks: the Corporate risk register has 4 risks, and the ICT risk register has 152, which is unwieldy.</li> </ul> <p>Where the ICT risk register is not being reviewed on a regular basis, there is a risk that new and emerging risks may not be identified and appropriately mitigated for, and actions taken to reduce current risks is not effective. This may impact on the delivery of the ICT Strategy.</p>			
<b>Key Risk Area</b>		<b>Information Governance</b>			
7	Minutes are available of the Business Transformation Programme Board.	<p>From review of the minutes of the Business Transformation Programme Board we found no evidence of the Knowledge and Information Service structure being approved.</p> <p>Where decisions are not clearly documented there is a risk that approval of strategic decisions is not clear and may be subject to future challenge.</p>	Approval of key changes to the organisational structure is clearly documented in the minutes.	Low	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b> BTPB were fully sighted on the proposals but the decision to approve a new structure rested with SMB due to the multi disciplinary and multi directorate impact.</p> <p><b>Who to be actioned by:</b></p>



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	Control description	Findings & Consequences	Recommendation	Priority	Management Response and Action Plan
					Director of Finance and Assets  <b>When to be actioned by:</b>  Actioned
<b>Key Risk Area</b>		<b>Data Quality</b>			
8	<b>Expected control:</b> There is a Data Quality Strategy in place.	A Data Quality Guide was put in place in November 2011 as an interim measure until the introduction of a Data Quality Strategy. To date, the resources to develop a Data Quality Strategy has not been in place to complete this work  Where there is no Data Quality Strategy in place the expectations and ownership for data quality throughout the organisation are not clear.	Each department will document their processes for managing data and detail the measures they have in place to ensure data quality. This work will feed into an overall Data Quality Strategy.	High	<b>Recommendation Agreed:</b> Yes  <b>Response:</b> This may be addressed as part of the Information Governance Strategy rather than a stand-alone Data Quality Strategy.  <b>Who to be actioned by:</b> Information Governance & Compliance Manager  <b>When to be actioned by:</b> July 2014
<b>Key Risk Area</b>		<b>Follow Up previous audit recommendations</b>			
<b>Previous audit name: ICT Strategy audit March 2012</b>					
9	The strategy document does not address all relevant aspects.	<b>Re-stated finding</b> Objectives specified in the strategy document do not have "SMART" characteristics. For some objectives it is not clear what actions should be taken to	<b>Re-stated recommendation</b> Objectives should be reviewed to ensure they are appropriately specific and quantitative so that	Medium	<b>Recommendation Agreed:</b> No  <b>Response:</b> A new ICT Strategy was developed in 2012/2103

	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>ensure they are achieved. Examples are: "ICT systems will be compatible. The number of systems in use will be the minimum necessary. Systems will be more stable and access faster."</p> <p>This will result in difficulty in setting targets and measuring achievement against agreed strategy objectives. Effective monitoring may not be possible. Objectives should be reviewed to ensure they are appropriately specific and quantitative so that achievement against them can be monitored.</p>	achievement against them can be monitored.		<p>which sets out the a series of projects aimed at addressing:</p> <ul style="list-style-type: none"> <li>- 34 key issues</li> <li>- 38 Strategic Business Requirements</li> </ul> <p>49 desired outcomes</p> <p>Spanning 'strategy', 'Customers', 'People', 'Processes' and 'Technology'.</p> <p>It is management's view that this provides sufficiently clear objectives from a high level strategic perspective and that these objectives are sufficiently measurable.</p> <p><b>Recommendation will be withdrawn due to compensating control.</b></p>
10	IT Service performance is not monitored.	<p><b>Re-stated finding</b></p> <p>Performance monitoring is undertaken to monitor the number of ICT service desk calls in breach of the SLA. This does not include the length of time elapsed before a call has been resolved.</p>	<p><b>Re-stated recommendation</b></p> <p>Directorate management should identify key performance indicators for ICT, instigate processes to measure actual performance and provide reports that will enable</p>	High	<p><b>Recommendation Agreed:</b> Partially</p> <p><b>Response:</b> Formal monitoring and reporting of ICT service performance does take place and the management information used to do this</p>





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	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>Performance monitoring is yet to be developed for all of the Knowledge &amp; Information Services deliverables, due to delays in staffing and embedding the new KIS working model. Furthermore, formal KPI's are yet to be developed for Directorates to be monitored by senior management</p> <p>There is a risk that there is no formal monitoring or reporting carried out of service quality / performance.</p> <p>Services may fail to meet required standards. Actions required to bring services to the required level may not be taken.</p>	senior management to monitor key areas of ICT performance.		<p>has been provided during the Audit. Management accept that new KPI's could be developed and reported against. The last post to be filled from the June 2013 KIS restructuring is the post of KIS Customer Services manager. This post will start in March 2014 and, with the KIS Manager, will consider what improvements could be made to ICT performance measures.</p> <p><b>Who to be actioned by:</b> Knowledge and Information Service Manager and the KIS Customer Services Manager</p> <p><b>When to be actioned by:</b> Dec 2014</p>
<b>Previous Audit Name : ICT Health Check Follow up December 2010</b>					
11	There is a lack of segregation of duties within the ICT Department.	<p><b>Re-stated finding</b></p> <p>Management should ensure that controls are implemented to compensate for the lack of segregation of duties within the ICT Department. These could include formal reviews of system logs or the review of work</p>	<p><b>Re-stated recommendation</b></p> <p>The logging server was included in the ICT Strategy and approved as part of the 2011/12 Capital programme. The server has now been procured</p>	Medium	<p><b>Recommendation Agreed:</b> Yes</p> <p><b>Response:</b> The logging server will be operational following work currently being undertaken</p>

	<b>Control description</b>	<b>Findings &amp; Consequences</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Management Response and Action Plan</b>
		<p>performed by technicians on a sample basis.</p> <p><b><u>Management update:</u></b> There is now a segregation of duties in place for IT procurement. The logging server system is in the ICT Strategy but has not yet been procured.</p>	<p>but not yet implemented.</p> <p><b><u>Audit update:</u></b> The logging server system should be utilised and form part of operational business activity.</p>		<p><b>Who to be actioned by:</b> Dave Thexton</p> <p><b>When to be actioned by:</b> June 2014</p>
12	There is no approved ICT SLA agreement in place.	<p><b><u>Re-stated finding</u></b> Management should review and update the existing ICT SLA in conjunction with relevant stakeholders to ensure that the agreement is up to date and meets the needs of the business. Once the agreement has been agreed, it should be formally approved and distributed to relevant personnel.</p> <p><b><u>Management update:</u></b> There is a draft SLA under consultation but this has not yet been agreed.</p>	<p><b><u>Re-stated recommendation</u></b> Once the ICT Service Level Agreement has been agreed by stakeholders it should be formally approved and distributed to relevant personnel.</p>	Medium	<p><b>Recommendation Agreed:</b> Partially</p> <p><b>Response:</b> An SLA does exist and fault resolution is measured against these targets. However a more extensive SLA for Service Delivery support is currently with Service Delivery management for their agreement.</p> <p><b>Who to be actioned by:</b> Mick Osborn</p> <p><b>When to be actioned by:</b> August 2014</p>

## Appendix A

### AUDIT SCOPE AND FRAMEWORK

#### 4. Specific Audit Scope

- 4.1 We have evaluated the area against the following identified risks which we agreed with management:

##### Area 1: ICT Strategy

- The ICT Strategy is not aligned with Corporate objectives.
- The ICT Strategy does not support the achievement of Service objectives.
- Plans for the delivery of the ICT Strategy are not clearly defined.
- Adequate resources are not available to deliver the ICT Strategy.
- Targets for delivery of components of the ICT Strategy are not met.
- Risks to the achievement of the Strategy have not been identified or managed.

##### Area 2: Information Governance

- There is no effective ICT Governance Framework in place.
- Decisions are not transparent and subject to effective scrutiny and the management of risk.
- Policies, Strategy and direction are not consistently applied.
- There is no sponsorship and ownership of ICT projects.

##### Area 3: Data Quality (To be covered as a separate audit as part of the 2014/15 audit plan)

##### Area 4: Follow Up previous audit recommendations

- Previously agreed management actions may not be adequately implemented leading to risks not being effectively managed.

- 4.2 Following preliminary risk assessments, the following processes were not included within the scope of this review and will be considered for inclusion within future audits of the area:

- |  |
|--|
| <ul style="list-style-type: none"><li>• None identified.</li></ul> |
|--|

**5. Audit Methodology and Opinions**

- a. The audit was undertaken using a risk-based methodology in a manner compliant with the CIPFA Code of Practice. The audit approach was developed with reference to the Internal Audit Manual and by an assessment of risks and management controls operating within each area of the scope. Where we consider that a risk is not being adequately managed, we have made recommendations that, when implemented, should help to ensure that the system objective is achieved in future and risks are reduced to an acceptable level.
- b. The matters raised in this report are only those, which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the risks that exist or all improvements that might be made.
- c. Each audit will result in an overall ‘audit assurance’. A detailed summary will be provided to the Overview and Audit Committee for all ‘limited’ assurance opinion reports. The range of audit opinions is outlined below:

<b>ASSURANCE</b>	<b>SUBSTANTIAL</b>	<b>REASONABLE</b>	<b>LIMITED</b>
<b>Adequacy of risk management techniques employed within the area.</b>	Thorough processes have been used to identify risks. Action being taken will result in risks being mitigated to acceptable levels. No more monitoring is necessary than is currently undertaken.	The action being taken will result key risks being mitigated to acceptable levels. Some additional monitoring is required.	No action is being taken, OR insufficient action is being taken to mitigate risks. Major improvements are required to the monitoring of risks and controls.
<b>Adequacy of the existing control framework to reduce identified risks to an acceptable level.</b>	Controls are in place to give assurance that the system’s risks will be mitigated.	Most controls are in place to give assurance that the system’s key risks will be managed but there are some weaknesses.	The control framework does not mitigate risk effectively. Key risks are not identified or addressed.
<b>Adequacy of compliance with the existing control framework.</b>	The control framework is generally complied with. Emerging risks are identified and addressed in a timely manner.	Compliance with the control framework mitigates risk to acceptable levels, except for the risks noted.	Compliance is poor so risks are not being mitigated to acceptable levels and it is probable that some objectives will not be, OR are not being achieved.

- d. The responsibility for a sound system of internal control rests with management. Internal audit procedures are designed to focus on areas identified by management as being of greatest risk and significance. Effective implementation of our recommendations by management is important for the maintenance of a reliable internal control system.