



GEDLING BOROUGH COUNCIL

INTERNAL AUDIT REPORT

CORPORATE GOVERNANCE AND PERFORMANCE
JUNE 2022

LEVEL OF ASSURANCE	
Design	Operational Effectiveness
Moderate	Moderate

IDEAS | PEOPLE | TRUST



EXECUTIVE SUMMARY	2
DETAILED FINDINGS	5
STAFF INTERVIEWED	14
APPENDIX I - CIPFA COMMITTEE SELF-ASSESSMENT	15
APPENDIX II - DEFINITIONS	17
APPENDIX III - TERMS OF REFERENCE.....	18

DISTRIBUTION

Name	Job Title
Mike Hill	Chief Executive Officer
Alison Ball	Director of Corporate Resources
Francesca Whyley	Head of Governance and Customer Services

REPORT STATUS LIST

Auditors:	Helena Warnett, Assistant Manager Gurpreet Dulay, Director
Dates work performed:	28 April - 24 May 2022
Draft report issued:	16 June 2022
Final report issued:	16 August 2022

EXECUTIVE SUMMARY**LEVEL OF ASSURANCE: (SEE APPENDIX II FOR DEFINITIONS)**

Design	Moderate	Generally, a sound system of internal control designed to achieve system objectives with some exceptions.
Effectiveness	Moderate	Evidence of non compliance with some controls, that may put Some of the system objectives at risk.

SUMMARY OF RECOMMENDATIONS: (SEE APPENDIX II FOR DEFINITIONS)

High	0
Medium	3
Low	1

TOTAL NUMBER OF RECOMMENDATIONS: 4**CRR REFERENCE:**

CRR 1- 13

BACKGROUND:

A Council's Code of Corporate Governance is the system by which local authorities direct and control their functions and relate to their communities. Robust corporate governance and performance management is the backbone of successful councils.

Gedling Borough Council (the Council) has a Cabinet model with an Overview and Scrutiny Committee as well as statutory committees. The Overview and Scrutiny Committee provides local accountability, allowing councillors who are not members of the Cabinet to examine decisions, policies and services of the authority ensuring they meet the objectives of the organisation.

Local authorities should have a robust governance and performance management framework in place to ensure that it is operating effectively and achieving its statutory duties and its pledges to the community it serves. Good governance is essential in ensuring that councils are effectively prioritising and making sound decisions.

We reviewed the Council's corporate governance arrangements to ensure they comply with best practice and help deliver the outcomes expected by the Council.

GOOD PRACTICE:

The following areas of good practice were identified:

- We carried out an examination of the key documentation which includes the Constitution, scheme of delegation and the annual corporate governance statement and have confirmed that these documents are available on the Council's website and are up to date. The Constitution was updated in March 2022 and sets out the terms of reference for the executive and non-executive committees and includes the scheme of delegations for the committees
- We confirmed that all the areas in the corporate plan are covered by the executive and non-executive committees and that they meet and scrutinise decisions and make recommendations to Cabinet. The minutes and reports from the committee meetings are available online for the public to access
- Mandatory Induction Training for all Members includes: Code of Conduct, GDPR Best Practice, Introduction into Finance, Service Area Market Place, Communications, Modern Governance and IT/IPad Training
- We carried out a review of the financial reporting information to ensure that it is regular and robust through verification of the information and discussions with the Head of Finance and ICT. We reviewed the budget monitoring and virement reports which are presented to Cabinet for quarter one 5 August 2021, quarter two 4 November 2021 and quarter 3 27 January 2022 along with the Gedling Plan Performance report. The financial reporting information in all instances has been approved by the Chief Financial Officer and the Monitoring Officer
- We obtained the quarter one to three reports which the Performance and Projects Officer uses to monitor progress made against the Gedling Plan's corporate priorities. We picked a sample of objectives within the corporate priorities in the Gedling Plan (reduce anti-social behaviour, crime and the fear of crime; improve the customer experience of engaging with the Council; provide more homes and promote and protect the environment by minimising pollution and waste and becoming carbon neutral) and followed through the reporting process on the Key Performance Indicators against each of these. We confirmed that Key Performance Indicators were adequately reported against for the four corporate objectives. The reports are published on the Council's website to ensure decision making is transparent
- We viewed two Committee meetings which took place in 2022 that were streamed on YouTube. We have confirmed that all committee meetings are streamed on YouTube and can be viewed by the public through the Council's website. For the meetings we viewed via YouTube, we have confirmed that the meetings indicated ethical and transparent decision making
- Through discussions with the Head of Governance and Customer Services and a thorough review of the Annual Governance Statement and the Code of Corporate Governance we can confirm that the Annual Governance Statement is compliant with the Code of Corporate Governance
- We carried out enquires with the Head of Finance and ICT to assess whether there had been any non-compliance breaches of the Code of Corporate Governance and it was confirmed by the Head of Finance and ICT there have been no reports of non-compliance.

KEY FINDINGS:

- The induction training skills programme for Members identified the name of the training course required to be completed, the attendees register, the date training was/is due to be delivered and the responsible trainer however, the skills programme does not define a minimum level of training expected of all Members to conduct their duties. Furthermore, compliance levels for some training such as Code of Conduct and GDPR for Members per documentation were both below 60% (Finding 1 - Medium)
- There is not a training skills matrix in place for Senior Management officers or a central record in place for the ongoing monitoring of standard and mandatory training needs (Finding 1 - Medium)
- The Head of Governance and Customer Services has an obligation to report officers Gifts and Hospitality to the Councils Senior leadership Team on a quarterly basis. However, we found a quarterly report to the Senior Leadership Team had not been completed in 2021/22 (Finding 2 - Medium)
- In our review, we identified there is not a process in place to encourage committees to undertake a regular reflection of their effectiveness (Finding 3 - Low)
- There is currently no centralised process in place for updating policies, we have established that some service areas may be carrying out policy reviews more regularly than others and a centralised record would assist in the monitoring of the policy review process (Finding 4 - Low).

CONCLUSION:

Overall, the Council have moderate controls in place for the management of corporate governance and performance management arrangements. The Council have an effective council, committee and reporting structure which enables decisions to be taken whilst engaging Members and the public. The Council also maintain work plans for the executive and non committees through minute taking. At present there is inadequate training delivered which could impact the Council meeting its objectives. Other weaknesses include a lack of reporting to the Senior Leadership Team on Gifts and Hospitality and the lack of a process in place to encourage committees to undertake regular reflection of their effectiveness. This leads us to conclude that the design of controls and control effectiveness is moderate.

DETAILED FINDINGS

RISK: MEMBERS AND SENIOR STAFF DO NOT POSSESS THE APPROPRIATE MIX OF SKILLS AND DO NOT RECEIVE ANY REQUIRED TRAINING AND DEVELOPMENT TO FULFIL THEIR ROLES

Ref	Significance	Finding
1	Medium	<p><u>Member training</u></p> <p>Members are required to make decisions on a wide range of issues. They also come from a wide variety of backgrounds and experiences and collectively bring a wide pool of knowledge and skills to the Council. An effective learning and development plan aims to ensure elected Members can develop their knowledge and skills to help the Council achieve its objectives for the benefit of the community.</p> <p>A training skills matrix is a document which is used by an organisation to plan and track training skills which are linked to specific tasks to complete and carry out specific skills to fulfil an individual's role.</p> <p>We examined the training programme and found:</p> <ul style="list-style-type: none"> • It identified the name of the training course required to be completed, the attendees register, the date training was/is due to be delivered and the responsible trainer however, the programme does not define a minimum level of training expected of all Members to conduct their duties • There are no references within the training programme highlighting specific areas which require additional training or further training. This could assist the Committees training courses for the year and could then link to a training log and the training opportunities provided to committee members • Members have not completed Corporate Governance training since 2018/19. <p>Through our enquires we have established that there is a training programme in place as part of a Council Members' Induction process, however the training skills matrix is not an ongoing document which is updated at regular intervals.</p> <p>We have confirmed that there is a standard suite of member training which is compiled by management without direct liaison with Members. Members are required to carry out this training following their election. Members are not permitted to sit on a Committee until they have passed their training and it has been signed off by the Head of Governance and Customer Services. Members would also be required to complete training if they move to another Committee.</p> <p>Following Members' initial training post-election, we understand that regular ongoing training is not completed at set intervals and areas such as Code of Conduct training will not be as up to date as it should be in order to ensure members are appropriately equipped with up-to-date knowledge and skills when making decisions.</p>

As part of the review we asked for Member attendance records for training. What we found from reviewing these documents was:

- Whilst the Council have signed attendance records, this is not centrally compiled on a document to allow quick access to confirm levels of compliance
- It is also not clear from the attendance records which Members the training is applicable to. However, some training such as Code of Conduct which we would expect is applicable to all 41 members. From review of records provided the training delivered for the latest session is signed as attended by 24 out of 41 Members (58%). We do recognise that there may be mitigations ie. a Member has previously completed the training and therefore it may not be applicable to re-attend. However, Council records do not record this and agree with the mitigation as it may be argued that it is mandatory for all Members irrespective of their previous attendance
- For GDPR training which may be considered applicable to all Members has been documented as attended by 21 of the 41 members and therefore has a compliance rate of (51%).

There is a risk that Members are not appropriately equipped with up-to-date knowledge and skills when making decisions, which could lead to the Council not being able to achieve its objectives for the benefit of the local community. We recognise that some Members are long-standing and may previously have had some training, or also serve as a County Councillor and may have had training elsewhere but this is not recorded by the Council.

Senior management training

Senior Managers within the public sector are statutory managers who have responsibilities for coordinating activities in functional departments, organising the management of resources within the organisation and managing the demands of stakeholders through the board of directors.

Through our enquires we have established that:

- There is not a training skills matrix in place for Senior Management officers. We acknowledge that training is monitored through the Personal Development Review process which is conducted annually with each Council employee. Any gaps in training are identified during these annual meetings.

Through our enquires we understand that Senior Managers are required to undertake a suite of induction training following their appointment to their job role at the Council. Managers have responsibility for monitoring training compliance via a training tick list which they have to ensure is completed before a Senior Manager can adequately undertake their job role.

Following the initial suite of induction training for Senior Managers, it has been confirmed through interview that training needs are not

rolled out at regular intervals, the process the Council follows is for any training gaps to be identified at the annual Personal Development Review process.

It is accepted through discussions with the Head of Governance and Customer Services that gaps in Senior Management training could result in managers not being equipped with up-to-date knowledge and skills which will enable them to get the best performance from their employees.

There is a risk that without regular training managers will not be able to get the best performance from their employees, have the ability to respond to issues quickly, improve communications with internal and external stakeholders and pass on mandatory skills to any successors to their current job role.

RECOMMENDATION:

- A) The Council should devise an ongoing training skills programme for Members which is regularly updated and reported to appropriate officers.

The training skills programme for Members should include:

- The specific skills set members are required to have to successfully complete Members mandatory training courses
- A requirement of the skills required by the Committees to evidence the specific skills Members are required to demonstrate to fulfil their job role
- The minimum requirement skill level of competency to complete Member training courses
- References within the training skills programme which highlight specific areas which require additional training or further training, this could assist the Committees training courses for the year and could then link to a training log and the training opportunities provided to committee members
- The date the training was last attended by a Member which is quickly accessible.

- b) The Council should devise a Corporate Governance training programme which is regularly updated to ensure that Senior Managers have the skills required to fulfil their job roles.

MANAGEMENT RESPONSE:

It is accepted that Member and Senior Officer training has lapsed over the last two years, largely due to resources being deployed in the Covid-19 response, although the pandemic did see the development of some positive training methods, particularly in relation to remote GDPR training for officers.

Whilst training needs are identified for staff through PDRs, an ongoing programme/matrix of Corporate Governance training for Senior Managers, is a recommendation which would assist in the development of Senior management, particularly given recent changes in management structure.

Similarly, member Training, whilst focused around induction following election mainly, should be ongoing and a more structured approach to this would be useful. New management in Democratic Services has also provided an opportunity for review of member training practices and records and the recommendation will assist in progressing this.

In terms of timings, given the impending election in 2023, it may be that this provides the opportunity for a new induction training suite for members.

Responsible Officer:

Francesca Whyley

Implementation Date:

31 December 2022

RISK: GOVERNANCE ARRANGEMENTS DO NOT SUPPORT AN APPROPRIATE CULTURE AND ETHOS WITHIN THE COUNCIL, THROUGH POLICIES RELATING TO CODE OF CONDUCT, GIFTS AND HOSPITALITY, WHISTLEBLOWING ETC.

Ref	Significance	Finding
2	Medium	<p><u>Gifts and hospitality</u></p> <p>Members of staff may on occasion be offered gifts or hospitality as a mark of courtesy or gratitude. Such offers can place staff in a difficult position, since to refuse may cause offence, but to accept may, in certain circumstances, may create a conflict of interest.</p> <p>The Councils Approved Gifts and Hospitality Code of Practice for Members and Officers 2019 states that “regarding Officers, Section 117(2) of the Local Government Act 1972 provides that an Officer of a Local Authority shall not, under the colour of his or her office of employment, accept any fee or reward whatsoever other than his or her proper remuneration. The expression ‘any fee or reward’ includes such things as unauthorised commissions, gifts or presents. Any person who contravenes this commits a criminal offence and is liable to disciplinary proceedings. Exceptions to this rule would include modest gifts of a promotional character, including such things as calendars, diaries, articles for use in the office, etc, or a small gift of low value on the conclusion of a courtesy visit to a factory or firm”.</p> <p>The Head of Governance and Customer Services has an obligation to report Officers Gifts and Hospitality to the Councils Senior Leadership Team on a quarterly basis.</p> <p>We have established that there is a log of Gifts and Hospitality which is kept up to date.</p> <p>We found:</p> <ul style="list-style-type: none"> • A quarterly report to Senior Leadership Team had not been completed in 2021/22 from the 1 April 2021 to 31 March 2022. <p>The risk of not reporting officers’ Gifts and Hospitality is an officer’s integrity could be brought into question by the acceptance of gifts and hospitality. The Code is reproduced in full in the Constitution. Failure to comply with the Code may be taken as evidence of maladministration by the Ombudsman on complaint being made or form the basis of a code of conduct complaint.</p>

RECOMMENDATION:

The Head of Governance and Customer Services should ensure officers Gifts and Hospitality are reported to the Councils Senior Leadership Team on a quarterly basis as per the Council Gifts and Hospitality Policy and to ensure that the Local Code of Corporate Governance upholds its commitment to Core Principle A ‘behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law’.

MANAGEMENT RESPONSE:

It is accepted that quarterly reporting to SLT should be undertaken. The register is available electronically and is therefore accessible to SLT at all times. It should also be noted that whilst quarterly reports were not maintained in 2021/22, an annual report was taken to Senior Leadership team in June 2022, as was an annual report to Standards Committee, so whilst reporting was not done with the regularity it should have been, there was an annual review undertaken.

Responsible Officer:
Francesca Whyley

Implementation Date:
30 September 2022

RISK: PERFORMANCE OF GOVERNANCE STRUCTURES IS NOT REGULARLY REVIEWED AND DOES NOT IDENTIFY ACTIONS FOR CONTINUOUS IMPROVEMENT.

Ref	Significance	Finding
3	Medium	<p><u>Self-assessment of committee effectiveness</u></p> <p>As part of a continuous improvement and in line with their terms of reference and the Council's constitution, committees are required to undertake periodic self-assessments facilitated by the Chair of the particular committee.</p> <p>It is a requirement of committee Terms of Reference to conduct self-assessments. We have established that self-assessments of committees are not taking place. This process has been impacted due to the Council not maintaining a central log of the last date self-assessments were undertaken and when they are next due to ensure they occur regularly and timely.</p> <p>We reviewed the Council Meetings, Minutes and Agendas for the Council, Cabinet, Overview and Scrutiny, Standards, Environment and Licensing, Planning, Appeals and Retirement, Joint Consultative and Safety and the Audit Licencing Act Panel and Committees along with the Gedling Youth Council for March to May 2022.</p> <p>There is a risk that opportunities for improvement are not appropriately identified and addressed, leading to committees that do not fully contribute to effective monitoring and oversight at the Council.</p>

RECOMMENDATION:

The Council should devise a set of questions that support self-assessment by committees either on an ongoing basis as part of their meetings, or as part of an annual process. Key questions could include:

- Did we receive all the relevant information we needed to discuss agenda items?
- If not, where are the gaps in information?
- Did we have enough time to discuss all agenda items?
- What strengths can we identify?
- Are we satisfied that all actions have been appropriately completed and followed up?
- How do we know/what evidence do we have that sustainable change has been implemented following decision-making?
- Is there full levels of committee wide engagement from meeting participants which is evidenced through the meeting minutes?

We have also included a template assessment from CIPFA in Appendix I for consideration by the Council.

MANAGEMENT RESPONSE:

This is a helpful recommendation and one that the Council will certainly look to implement. It is useful for officers and members to reflect on the effectiveness of Committees,

particularly as we move towards an election and potentially, new members coming into the committees.

Responsible Officer:
Francesca Whyley

Implementation Date:
31 March 2023 to
implement the process
and then to conduct self
assessments by 31 March
2024

RISK: PERFORMANCE OF GOVERNANCE STRUCTURES IS NOT REGULARLY REVIEWED AND DOES NOT IDENTIFY ACTIONS FOR CONTINUOUS IMPROVEMENT.

Ref	Significance	Finding
4	Low	<p><u>Policies</u></p> <p>Effective policies and procedures are living documents that must grow and adapt with an organisation. While the core elements and the intent of the policy will likely remain the same, keeping people, equipment, assets, and information safe will need to adapt to changes within the organisation.</p> <p>We carried out a review of the key policies which relate to Corporate Governance which include the Whistleblowing Policy which was adopted in 2020, and the Gifts and Hospitality Policy which were last updated in 2019. Whilst we acknowledge it is not a requirement to update policies on an annual basis and therefore except that the policies are within date, we have noted that there is a reasonable time period between reviews.</p> <p>We found:</p> <ul style="list-style-type: none"> • There is currently no centralised process in place for updating policies • From discussions with the Head of Governance and Customer Services we established that some service areas may be carrying out policy reviews more regularly than others and a centralised record would assist in the monitoring of the policy review process. <p>We acknowledge that the Chief Executive of the Council is currently in the process of putting together a centralised checker for all policies so their review can be monitored and therefore have raised this as a low rather than a medium finding.</p> <p>There is a risk that not carrying out a regular review of policies could lead to outdated policies within an organisation. Outdated policies may fail to comply with new laws and regulations. They may also fail to address new systems or technology, which can result in inconsistent practices.</p>

RECOMMENDATION:

The Council should continue putting together a centralised checker for all policies so their review can be monitored at regular intervals eg. annually and ensure that the centralised checker is circulated to all appropriate officers for regular review.

MANAGEMENT RESPONSE:

This recommendation is accepted to ensure policies remain fit for purpose.

Responsible Officer:
Francesca Whyley

Implementation Date:
30 September 2022

STAFF INTERVIEWED

BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

Name	Job Title
Francesca Whyley	Head of Governance and Customer Services
Alan Green	Head of HR Performance and Service Planning
Alison Ball	Director of Corporate Resources and Section 151 Officer

APPENDIX I - CIPFA COMMITTEE SELF-ASSESSMENT

Ref.	Statement	1 - Strongly Disagree	2	3	4	5 - Strongly Agree
1	Goals or Purpose of Committee					
A	All committee members understand the goals and purpose of our committee					
B	The committee members agree on the goals and purpose of the committee					
C	There is alignment between our goals and purpose and the actions taken and/or the decisions made by the committee					
2	Support for the Committee					
A	Our committee has adequate resources (for example, budget, people) to support its function					
B	Our committee has the respect and support of key stakeholders within our organization					
3	Time and Location of Meetings					
A	Our meetings are held regularly and with appropriate frequency					
B	Our meetings begin and end as scheduled					
C	The length of our meetings is appropriate and respectful of the agenda					
D	We receive the meeting agenda and materials in advance of the meeting to allow for appropriate review and preparation					
E	We consistently use our meeting time well. Issues get the time and attention proportionate to their importance					
F	The location where our meetings are held is conducive to positive group interaction and discussion					
4	Attendance					
A	Attendance at our meetings is consistent and members arrive on time					
B	Attendance at our meetings is evaluated as a criterion for continued membership on the committee					
5	Recording / Minutes					
A	The minutes of our meetings are accurate and reflect the discussion, next steps and/or action items articulated by the members					
6	Membership					
A	Our membership represents the talent and skill set required to fulfil the goals and purpose of the committee					

B	Our members treat each other with respect and courtesy					
C	Our members come to meetings prepared and ready to contribute					
D	As a general rule, when I speak I feel listened to and that my comments are valued					
N7	General Comments					
A	What works well in the meetings					
B	What I would like to see improve at our meetings					
C	What areas should the committee focus on in the future?					

APPENDIX II - DEFINITIONS				
LEVEL OF ASSURANCE	DESIGN OF INTERNAL CONTROL FRAMEWORK		OPERATIONAL EFFECTIVENESS OF CONTROLS	
	FINDINGS FROM REVIEW	DESIGN OPINION	FINDINGS FROM REVIEW	EFFECTIVENESS OPINION
Substantial	Appropriate procedures and controls in place to mitigate the key risks.	There is a sound system of internal control designed to achieve system objectives.	No, or only minor, exceptions found in testing of the procedures and controls.	The controls that are in place are being consistently applied.
Moderate	In the main there are appropriate procedures and controls in place to mitigate the key risks reviewed albeit with some that are not fully effective.	Generally a sound system of internal control designed to achieve system objectives with some exceptions.	A small number of exceptions found in testing of the procedures and controls.	Evidence of non compliance with some controls, that may put some of the system objectives at risk.
Limited	A number of significant gaps identified in the procedures and controls in key areas. Where practical, efforts should be made to address in-year.	System of internal controls is weakened with system objectives at risk of not being achieved.	A number of reoccurring exceptions found in testing of the procedures and controls. Where practical, efforts should be made to address in-year.	Non-compliance with key procedures and controls places the system objectives at risk.
No	For all risk areas there are significant gaps in the procedures and controls. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Poor system of internal control.	Due to absence of effective controls and procedures, no reliance can be placed on their operation. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Non compliance and/or compliance with inadequate controls.

RECOMMENDATION SIGNIFICANCE	
High	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
Medium	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
Low	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

APPENDIX III - TERMS OF REFERENCE

PURPOSE OF REVIEW:

The purpose of this audit is to review the Council's corporate governance arrangements to ensure they comply with best practice and help to deliver the outcomes of the organisation required by the Borough.

KEY RISKS:

- There is an ineffective council, committee and reporting structure in place which does not enable decisions to be taken whilst engaging Members and the public
- Work plans are not maintained for the executive/committees through minute taking and action tracking
- Members and senior staff do not possess the appropriate mix of skills and do not receive any required training and development to fulfil their roles
- Governance arrangements do not support an appropriate culture and ethos within the Council, through policies relating to code of conduct, gifts and hospitality, whistleblowing etc.
- Performance of governance structures is not regularly reviewed and does not identify actions for continuous improvement.

SCOPE OF REVIEW:

The following areas will be covered as part of this review:

- Review whether there is an effective council, committee and reporting structure in place that enables decisions to be taken whilst engaging Members and the public
- Confirm work plans are maintained for the executive/ committees through minute taking and action tracking
- Review the Annual Governance Statement and confirm that it is compliant with the Code of Corporate Governance
- Confirm that members and senior staff possess the appropriate mix of skills and receive any required training and development to fulfil their roles
- Confirm if governance arrangements support an appropriate culture and ethos within the Council through policies relating to code of conduct, gifts and hospitality, whistleblowing etc.
- Confirm if there is regular review of the performance of the governance structures to identify ways to enhance them for the future.

However, Internal Audit will bring to the attention of management any points relating to other areas that come to their attention during the course of the audit. We assume for the purposes of estimating the number of days of audit work that there is one control environment, and that we will be providing assurance over controls in this environment. If this is not the case, our estimate of audit days may not be accurate.

APPROACH:

Our approach will be to conduct interviews to establish the controls in operation for each of our areas of audit work. We will then seek documentary evidence that these controls are designed as described. We will evaluate these controls to identify whether they adequately address the risks. We will seek to gain evidence of the satisfactory operation of the controls to verify the effectiveness of the control through use of a range of tools and techniques.

FOR MORE INFORMATION:

Greg Rubins

Greg.Rubins@bdo.co.uk

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 weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

BDO LLP, a UK limited liability partnership registered in England and Wales under number OC305127, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms. A list of members' names is open to inspection at our registered office, 55 Baker Street, London W1U 7EU. BDO LLP is authorised and regulated by the Financial Conduct Authority to conduct investment business.

BDO is the brand name of the BDO network and for each of the BDO Member Firms.

BDO Northern Ireland, a partnership formed in and under the laws of Northern Ireland, is licensed to operate within the international BDO network of independent member firms.

Copyright ©2022 BDO LLP. All rights reserved.