

Audit Committee, 19 March 2015

Internal audit – Review of recommendations

Executive summary and recommendations

At its meeting on 29 September 2011, the Committee agreed that it should receive a paper at each meeting, setting out progress on recommendations from internal audit reports.

Most of the information in the appendix is taken from the wording of the internal audit reports. The exception is the 'update' paragraph in the right-hand column, which provides details of progress.

Recommendations which have been implemented have been removed from this report. The original numbering of recommendations has been retained.

Decision

The Committee is requested to discuss the paper.

Background information

Please refer to individual internal audit reports for the background to recommendations.

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

12 March 2015

Recommendations from internal audit reports

Core Financial Systems – Payroll (report dated September 2011 – considered at Audit Committee 29 September 2011)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental		None
Significant		None
Housekeeping		3

Risk 3: Financial losses arising from fraud or error, inefficient processing or inappropriate activity (such as ghost employees, payment of staff who no longer work at the Council, authorised payments, etc)

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
2	<p><i>Observation:</i> Finance receive an HR Pack on a monthly basis which includes the HR Summary spreadsheet and relevant supporting documentation detailing starters; leavers; contractual variations; acting-up allowances; changes to address etc.</p> <p>Whilst our review confirmed that this information was received by Finance, in a timely manner and before the deadline of the 15th of the month, as there is currently no direct interface between the HR Systems and Sage, the information has to be entered again on</p>	As part of the planned review of the HR system, consideration should be given to a more effective interface between the HR and Payroll systems to avoid duplication in entry of data.	Housekeeping	Project proposal to review HR & partners information systems, including link to payroll to be submitted to Executive team in November 2011. If agreed will form part of 2012/13 project plan.	<p>Director of Finance/ HR Director.</p> <p>Update</p> <p>10/3/2015 – We have started discussions with the supplier of the HR and Partners system to identify whether their integrated payroll service would be suitable for our needs.</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
	<p>to Sage.</p> <p>It is noted that a review of the HR system is planned to be undertaken.</p> <p><i>Risk:</i> Holding two databases with staff details and duplication of data entry are unlikely to be an efficient use of resources.</p> <p>Errors are more likely to arise where data is re-keyed.</p>				<p>Previous updates:</p> <p>09/10/2014 – The HR and Partners system build business case was approved by EMT to enter the start-up phase on 9 September. A supplier has been identified.</p> <p>24/06/2014 – Still pending the HR & Partners project. Bids from suppliers have been received and are being assessed but no contract yet awarded so the project has not yet entered the build phase.</p> <p>20/03/2014 - HR & Partners Systems Review phase is due to end on 31 March 2014. The project will then enter the build stage.</p>

Income Collection & Debtors (report dated September 2012 – considered at Audit Committee 28 November 2012)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental		None
Significant		None
Housekeeping		3

Risk 1: Inability to collect from debtors (Finance – Risk No 15.6)

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
1	<p><i>Observation:</i> Currently, all payments received by cheque, postal order and cash are initially processed on NetRegulate by Registration Advisors and then all information is transferred to Finance – Transactions team for checking and processing the following day. The same cheque/postal order is reviewed and checked twice (once in Registrations when it is input to NetRegulate, and once in Finance as part of the daily banking). It is not clear that the checking of each cheque/postal order in Finance, which may take a considerable amount of time, adds much value in addition to the original check performed by Registrations.</p> <p>The checking of cheques and postal</p>	<p>Consideration should be given to reviewing the processes for checking and banking of income received by cheque, postal order and credit /debit card to ensure that the most efficient process is in place. For example, the current checking performed by Registrations and Finance and the</p>	Housekeeping	<p>We agree that the way this process is currently handled is not the most efficient and consideration will be given to ways of eliminating the duplication of tasks.</p>	<p>Director of Finance/Head of Registration</p> <p>Update</p> <p>10/3/15 – Cleared. Since October 2014, Finance checks that the total value of cheques & postal orders matches the total on the batch received from Registrations but no longer re-checks the individual items.</p> <p>Previous updates:</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
	<p>orders is not the main role of Registration Advisors who primarily deal with processing application forms and advising registrants and applicants on matters relating to their registration. Therefore a 'cashier' role specifically dealing with cheques, postal orders and credit/debit card payments and not dealing with other parts of the Registration process may be more efficient and less likely to produce errors.</p> <p>Such a role would reduce or remove the need for additional checks in Finance – Transactions and would also speed up the processing, such that transactions processed on NetRegulate by Registrations would not have to wait until the following day to be checked and processed in Finance – Transactions, but could be banked the same day – thereby reducing problems around cut-off at the end of each month.</p> <p><i>Risk:</i> Duplication of effort resulting in inefficient use of resources.</p>	<p>potential for a 'Cashier' role.</p>			<p>09/10/2014 – Still pending while higher priority issues are addressed.</p> <p>24/06/2014 – Still pending while higher priority issues are addressed.</p> <p>20/03/2014 - Improvements to this system will be considered in HCPC project prioritisation plan for the new financial year 2014/15</p>

Bribery Act (report dated March 2013 – considered at Audit Committee 25 June 2013)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental		None
Significant		2
Housekeeping		5

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
5.5	<p><i>Supplier Due Diligence:</i> High risk suppliers that would warrant enhanced due diligence have not yet been identified.</p> <p>There is a risk that HCPC are engaging with suppliers who have been, or who are currently, engaged in bribery, thereby leading to reputational damage and potential breach of the Bribery Act by the organisation.</p>	<p>Based on expenditure (both in terms of value and number of transactions), the sector/services they are involved in, and the country in which they are based, an assessment should be made on the current and future supplier list to identify any that could be considered higher risk.</p> <p>For any such suppliers due diligence should be extended as appropriate, for example conducting a search of directors with disqualifications, news searches for court cases involving bribery etc.</p>	3	<p>All our suppliers are based in the UK. We undertake due diligence on new suppliers and tendering via the OJEU imposes controls through prescribed requirements and involvement of different people in the process.</p> <p>A review of our suppliers' database will be one of the tasks assigned to our procurement manager when recruited.</p>	<p>Procurement Manager</p> <p>Update 10/3/2015 – Documentation of procurement procedures has started but is not yet complete. Revised date for completion by end quarter two of 2015-16.</p> <p>Previous updates: 09/10/2014 – Procedures to be documented by the end of 2014-15.</p>

					<p>24/06/2014 – We are developing procedures for the review of the financial health and the integrity of our suppliers to address this risk and risk 15.21 on the risk register, using credit reference agencies. Our view is that suppliers in our sector are relatively low risk in relation to bribery.</p> <p>20/03/2014 - The review will be undertaken in the first quarter of 2014-15</p>
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Disaster Recovery / Business Continuity Planning (report dated October 2013 – considered at Audit Committee 28 November 2013)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental		None
Significant		None
Housekeeping		1

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
6.2	<p>Observation: The Business Continuity Plan is centrally controlled and managed by the Head of Business Process Improvement but is distributed as a paper document to 52 different people or locations.</p> <p>This makes it possible for uncontrolled documentation that may be outdated to still be held. Anecdotal evidence suggests that this has been the case on a number of occasions.</p> <p>There would be benefits with using an alternative method for managing how the plan is accessed such as improved version control and distribution.</p> <p>Potential alternatives include managing</p>	<p>HCPC should consider alternative methods of version control and distribution for the BCP, i.e. via secure internet/intranet, cloud service or secure USB key..</p>	3	<p>The Executive consider technology based solutions for the update and distribution of the BCP every year as part of the project prioritisation process and budget discussions. To date other statutory requirements have reached a higher priority than this project.</p> <p>This item remains on the long list of important projects until actioned. This project will be considered again in the project prioritisation process and budget discussions taking</p>	<p>Head of Business Process Improvement</p> <p>Update 19/03/2015 - A successful test with the preferred supplier has taken place and the procurement exercise is completing</p> <p>Previous updates: 09/10/2014 – BPI are meeting a potential external supplier on 02/10/2014. Options will be reviewed following this. If the external option is</p>

	<p>access via a central storage point i.e. secure internet or intranet location, cloud-based service or distributed by secure USB device.</p> <p>Risk: Plans may lack effective version control which may cause people to refer to old or out-dated version of the Business Continuity Plan causing delays in recovery.</p>			<p>place in December and February for the forthcoming (2014/15) budget year.</p>	<p>perused a procurement process will be run.</p> <p>24/06/2014 – BPI plan to investigate if an in house system could be used instead of an external procurement.</p> <p>20/03/2014 – This project has been provided for within the 2014-15 BPI budget. The ability to produce paper versions will remain as a contingency</p>
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Partners Expenses (Report dated March 2014 – considered at Audit Committee 20 March 2014)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental	None	
Significant	1	
Housekeeping	1	

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
6.1	<p><i>Observation:</i> The Expenses Policy for Partners states “Travel and accommodation should be booked through the HCPC’s preferred travel agent Co-operative Travel Management”. However, this is not mandatory and there are no specific consequences for not doing so other than if abused.</p> <p>Up to period 9 of the current financial year, 42% (by value - £390k of £930k) of partners’ expenses authorised and paid by HCPC have been claimed by direct reimbursement rather than using the services of Co-operative Travel Management.</p> <p>In addition to the value for money implications, limited usage of the travel</p>	(i) HCPC should remind partners of its preference for them to book travel requirements through the appointed travel service in preference to the direct bookings which are currently made in the significant number of cases noted.	2	<p>Agreed. Partners will be reminded of the current policy. Through the travel tender, we intend to address partners’ concerns about the current system (including usability & price) and review their comments as to why they are not using the travel company.</p> <p>We will also explain to partners the benefits to HCPC of routing all bookings through the travel provider (simplified transactions, duty of care, better value for money, better management information).</p>	<p>December 2014 - Head of Financial Accounting.</p> <p>Update</p> <p>10/3/2015 – The new travel management contract was signed in February 2015 and is due to go live in April. We plan a parallel run of 3 or 4 months with the previous travel supplier before use of the new supplier becomes mandatory.</p> <p>Previous updates:</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
	<p>bureau means that management information on expenditure is restricted.</p> <p>HCPC is currently planning to market test its travel management arrangements and forms redesigned to obtain additional detail regarding the reasons for direct bookings.</p> <p><i>Risk:</i> Failure to achieve value for money.</p>			<p>As part of the new travel management contract, the Executive proposes that it should become mandatory to book all travel and related services such as hotel accommodation through the service provider except in exceptional circumstances. The policy would apply to Council members, Partners and Executive.</p>	<p>09/10/2014 - Updated expenses policies were agreed by Council in September and are being communicated to partners and employees. We expect to complete the travel management contract retender by the end of 2014-15.</p> <p>24/06/2014 – Partners were reminded of the policy in December and January, and the policy is explained at new partners' induction training. The process to retender the travel management contract has started.</p>
6.1	As above	(ii) Further to (i) above, consideration should be given to developing further management information regarding	3	The partner expense codes in the nominal ledger are currently being reviewed. More codes will be introduced to help with	<p>April 2014 - Head of Financial Accounting</p> <p>Update</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
		partners' expenses for analysis and to inform future policy.		<p>the analysis of the expenses.</p> <p>A full requirement of the management information will be included within the travel tender documents, which will allow for greater analysis.</p>	<p>10/3/2015 – Cleared. The new travel management contract was signed in February 2015 and provides for better management information.</p> <p>Previous updates</p> <p>09/10/2014 - No change</p> <p>24/06/2014 - To be addressed in parallel with the travel tender.</p>

Stakeholder Communications (Report dated January 2014 – considered at Audit Committee 20 March 2014)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental	None	
Significant	1	
Housekeeping	1	

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
6.2	<p><i>Observation:</i> As is typical across the communications functions of many organisations, there is difficulty in establishing definite measurement and quantification of the effectiveness and impact of communication with stakeholders. Responses to traditional questionnaires generally tend to achieve a low response rate.</p> <p>There may be an opportunity to develop the processes for measurement of effectiveness following completion of the stakeholder analysis work noted earlier in this report.</p> <p><i>Risk:</i> Weaknesses in knowledge of which communication methods are most effective can lead to the allocation of resource not achieving maximum efficiency.</p>	<p>Following on from the work currently underway regarding stakeholder analysis, the outcome should be used to confirm the most effective methods of measuring success of the various methods of engagement with stakeholders.</p> <p>In turn this information can be used to inform future resource planning based on any information held regarding the priorities and methods of engagement.</p>	2	<p>We will be commissioning our regular stakeholder analysis and polling in 2014-15 and this will be used to measure methods of engagement. We will also use the stakeholder analysis and mapping to inform this.</p>	<p>By end 2014 / Director of Communications</p> <p>Update</p> <p>Cleared 05/03/2015 – polling completed, findings and action plan reported to Council 12.2.15</p> <p>Previous updates</p> <p>09/10/2014 - The stakeholder polling will take place in autumn 2014, after which it will be analysed. The aim is to complete the analysis work by December 2014</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
					24/06/2014 - This activity is included in the Communications budget and workplan for 2014-15

Health and Safety (Report dated March 2014 – considered at Audit Committee 20 March 2014)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental		None
Significant		2
Housekeeping		3

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
6.2	<p><i>Observation:</i> A criminal record checking provider, TMG is used to carry out such checks for staff in FTP. The TMG online criminal record check application allows electronic submission of such applications and tracks progress of applications from the application management dashboard. Prior to this a spread sheet was in use to record the issue dates of the DBS checks received. The spread sheet record is still held. Our sample testing of new starters as part of our internal audit of HR – Recruitment, Retention and Succession Planning (report reference 05.13/14) did not identify any exceptions in relation to DBS checking of new starters during 2013/14.</p> <p>HPCP currently employs 78 staff within</p>	<p>Consideration should be given to renewing DBS checks after an agreed time period such as three years.</p>	3	<p>The policy will be reviewed over the next 12 months.</p>	<p>Director of Human Resources - February 2015</p> <p>Update 19/03/2015 - The HR Director is currently seeking legal advice. The review should be complete by June 2015</p> <p>Previous updates 09/10/2014 – This review will initiate towards the end of 2014 when resources are available.</p> <p>24/06/2014 - This</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
	<p>FtP. From a list of such staff, we selected a sample of 15 to verify whether the required DBS check was conducted. Nine of our sample pre-dated the use of the TMG CRB system and were checked against the previous process. We confirmed that for six of these, the DBS check was carried out at least five years ago.</p> <p>Although there is no official expiry date for a criminal record check issued by DBS, the information revealed will only be accurate at the time the certificate was issued. It is therefore generally considered good practice to renew DBS checks after an agreed time period usually three years.</p> <p><i>Risk:</i> HCPC may not be aware of any changes to the criminal record of staff in post, which may lead to no appropriate action taken and/ or reputational damage.</p>				review will initiate towards the end of 2014.
6.3	<p><i>Observation:</i> For the leased site at 33 Stannary Street, arrangements for testing and inspection of fire alarms and the annual servicing of fire extinguishers are the responsibility of the company maintaining the premises. At the time of</p>	<p>HCPC should obtain assurances/copies of certificates for servicing of the fire extinguishers and tests of fire alarms for 33 Stannary Street.</p>	2	<p>HCPC have requested assurances from the managing agents that the fire alarm system is tested in accordance with the statutory regulations.</p>	<p>April 2014</p> <p>Update</p> <p>19/03/15 – we continue to follow up</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
	<p>our visit HCPC had not received any formal assurances from the company that these are up to date.</p> <p><i>Risk:</i> Fire alarms and extinguishers may not be serviced in accordance with agreed intervals and therefore prove ineffective in the event of an incident occurring.</p>			<p>Copies of the relevant certificates in relation to the servicing of fire extinguishers have also been requested. HCPC has also requested a copy of the current Health & Safety/Fire Safety Risk Assessment. All information has been requested by 1st April 2014</p>	<p>our previous request for the documents</p> <p>Previous updates</p> <p>24/09/2014 – the managing agents of 33 Stannary Street have recently changed, we continue to follow up our previous request for the documents.</p> <p>10/06/2014 - Documents have been requested from the managing agents.</p>

ICT – Disaster Recovery (DR) NetRegulate System

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number	of recommendations
Fundamental	None	
Significant	1	
Housekeeping	None	

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
6.1	<p><i>Observation:</i> On the day of our audit review we requested evidence that the live replication of the NetRegulate database from the main site at HCPC to the standby site at Rackspace was operating as expected. On investigation it was identified that the live replication had not worked for a period of around 5 days.</p> <p>Whilst this does not mean that the system was without backup, it does mean that the frontline method, for both continued operation in the event of a disaster and the prime recovery method, were not operating. The lack of reporting of a failure around this service was noticeable.</p> <p>Tape backups of the database</p>	HCPC should ensure that alerts that warn the ICT Team when backups fail are established.	2	<p>The technical team are working with the technical support team at Oracle to create a mechanism for effective alerting from the synchronisation software.</p> <p>The technical implementation is now in the user acceptance test system for validation and a formal change request is being written to promote it to the production environment as soon as the tests are completed successfully. In the interim the synchronisation manager console is being manually checked daily to</p>	<p>December 2014 Director of IT</p> <p>Complete</p> <p>A mechanism has been created after consultation with the Oracle support team which now proactively alerts the HCPC support team of any errors in the synchronisation software. The alerting system is now operational</p>

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ Responsibility
	<p>remained operational and available which would provide restoration of services which should limit any data loss to a maximum of 24 hours.</p> <p>It should also be noted that subsequent to our visit the live replication is now working again.</p> <p><i>Risk:</i> Primary recovery and continued service are not available or working as expected.</p>			<p>affirm continued protection.</p> <p>The change is expected to be made into the production environment by December 2014.</p>	