

## Internal Audit report – Payroll

### Executive Summary

As part of the 2020-21 Internal Audit Plan as approved by the Committee, BDO LLP have undertaken a review of the HCPC's Payroll

The objective of the audit was to provide assurance that the HCPC's payroll process have been designed appropriately and that key risks relating to payroll are being managed effectively. The key risks with this area of activity are whether there are adequate mitigating controls on the following processes with regards to maintaining an accurate version of standing data within the payroll system and timely updates to the data within the system

Previous consideration	None.
Decision	The Committee is invited to discuss the report.
Next steps	Recommended actions agreed with the Executive will be tracked for progress in the Committee's standing recommendation tracker report.
Strategic priority	All
Risk	All
Financial and resource implications	The cost of the audit is included in the Internal Audit annual fee.
Author	BDO LLP



# HEALTH & CARE PROFESSIONS COUNCIL

## INTERNAL AUDIT REPORT - FINAL REPORT

PAYROLL  
JUNE 2021



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Document history			Distribution	
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Auditor: Raeshan Downer  
Reviewed by: William Jennings

# 1 Executive Summary

## Introduction

- 1.1 This audit was completed in accordance with the approved Health & Care Professions Council (HCPC) internal audit plan for 2020/21.
- 1.2 HCPC is a UK-wide regulator of 15 health and care professions with a statutory responsibility of regulating them so that those registered meet required standards, including setting the standards for education and training. The primary purpose being to protect members of the public.
- 1.3 HCPC employs around 245 staff and there are 19 council members, who each receive an income and are paid through the payroll. Payroll is carried out by an outsourced payroll provider, Core Bureau. The responsibilities regarding the payroll are specified in the Service Level Agreement between HCPC and Core Bureau. Core Bureau is responsible for calculating gross pay, tax deductions, NI contributions and therefore the net pay due to each employee. This is calculable from information updated by HCPC each month. HCPC's responsibilities include updating the Core HR system with standing data regarding employees, and providing information on any sickness, approved absence and holiday arrangements, such as maternity/paternity leave and settlement payments. HCPC is also responsible for checking the payroll reports generated by Core Bureau for errors and inconsistencies based, on the change information for the current month.
- 1.4 HCPC's HR Operations team consists of three people with a currently vacant position, and is overseen by the Head of Partners & HR Operations. The HR Generalists within this team are responsible for processing the payroll changes each month in the Core HR system. Changes outside the system, such as tax code changes, maternity/paternity allowances and statutory sick pay arrangements, are provided to Core Bureau through the Access Collaborate secure platform. The Finance team also engages in payroll analysis of the employee payroll (known as the PG100 payroll) and payroll processing for HCPC council members (known as the PG200 payroll). PG200 payroll is also processed through Core HR, but it is conducted by the Financial Control Manager (Finance Directorate), separate from HR Operations.
- 1.5 Payroll information is drawn from the standing HR data within the Core HR system in real-time, and information within HCPC's Core Payroll system is accessible by Core Bureau when processing the monthly payroll.
- 1.6 Across the three months under review (November 2020, December 2020 and February 2021), average payroll costs (excluding tax and NI) of circa £604,313 (£591,814 for employees and £12,499 for council members) were processed per month.

## Review objectives and approach

- 1.7 The objective of the audit was to provide assurance that the HCPC's payroll process have been designed appropriately and that key risks relating to payroll are being managed effectively. The key risks with this area of activity are whether there are adequate mitigating controls on the following processes with regards to maintaining an accurate version of standing data within the payroll system and timely updates to the data within the system:
  - Adequate payroll policies and procedures – and their subsequent distribution and availability.
  - Accuracy of information within the Core HR system.
  - Timeliness of amendments to Core HR data – notably in relation to new starters and leavers.
  - Accuracy of information provided to Core Bureau outside of the Core HR system – and the approvals regarding this information transfer.

- Exception reporting and supervisory controls undertaken across the payroll process – by the HR Ops team and by HCPC senior management.
- Accessibility to sensitive HR and Payroll data - within Core HR and HCPC’s own network environment.

1.8 The approach to the review included interviews to understand the payroll process with a focus on the design of controls and testing their operation, to confirm whether the controls operate in practice. This included assessing the appropriateness and effectiveness of key documentation and controls related to successful processing of the monthly payroll.

### Key conclusions



Weaknesses have been identified in the control framework or non-compliance which put achievement of system objectives at risk. Some remedial action will be required.

- 1.9 Overall, the payroll processes under review at HCPC were found to be mostly well managed. The policies and procedures in place cover any processes, calculations and operational queries that relevant staff may have to action the payroll. From interviews with staff during the audit fieldwork, we noted that staff had a good understanding of the overall processes and the control measures in place. We also noted that segregation of duties was present throughout the payroll process and sufficient oversight by other employees was demonstrated. However we noted the PG200 payroll processing procedure conducted by the Finance department is not documented in the Payroll Manual or any supporting payroll files.
- 1.10 HCPC retains employee source data files in its shared network drive, which is used to update information in the Core HR system and is HCPC’s backup source of data if there are information discrepancies during checking. Information in Core HR is also updated and provided by managers through the Manager Requests function in the system. Manager Requests can only be actioned by an employee’s line manager and have pre-defined system workflows for approval.
- 1.11 In addition to individual changes by line managers, amendments to Core HR data are also processed by both the HR Ops and Finance teams depending on the data being processed. These changes are audit traceable within the system, regarding the approver and the date of approval. The finance team processes the PG200 council members’ payroll outside of Core HR, and gain approval over their payroll processing manually from the Head of Governance.
- 1.12 Core Bureau receives information transferred outside of the Core HR system via the Access Collaborate system, a password-protected file sharing platform. The information containing amendments made to staff data is verified by other HR Generalists, to ensure segregation of duties. These checks are conducted using the Oracle BI system-generated reports, and the Head of Partners and HR Operations, Head of Finance and the Financial Control Manager are notified when the change information is uploaded to the secure information sharing platform Access Collaborate (via automated email by the information sharing platform).
- 1.13 Core Bureau’s data processing centres are located in Ireland, and its two sites (Cork and Kilkenny) both hold ISO 27001:2013 accreditations over information security management systems in relation to information hosting, payroll services, financial & payment processing software development and deliver, and client data and infrastructure. However, ISO27001 is a ‘point in time’ certification, which demonstrates a level of security has been reached but does not provide assurance that it is maintained over a period of time. SOC2 certifications, however, do provide such assurances over maintenance of standards over a period and are thus usually offered by service providers such as payroll bureaus as a result. These elements of external assurance should be considered when outsourcing operational functions such as payroll.
- 1.14 Comparisons of gross pay to net pay are provided by Core Bureau each month, but are also re-calculated by Finance for both the PG100 and PG200 payrolls. Departmental Validation Check reports are also generated

## Internal Audit Report – Payroll

by the HR Ops team and sent to Heads of Department to report on any queries on an exception-only basis. In regards to payroll approval, a BACS Trustee list is maintained within HCPC, and an approver from each of the HR and Finance Directorate respectively is required to commit the payment. During testing we noted the financial scheme of delegation does not contain mention or reference to the approved individuals capable of authorising payroll transactions, and is therefore not in line with the BACS Trustee list held within the organisation.

- 1.15 While the proposed monthly pay reports are sent to relevant HCPC line managers to identify any exceptions or errors, we noted that these departmental level controls rely on relevant managers reviewing reports and contacting HR teams if any issues are identified. It is not currently part of the process to require relevant managers to positively confirm that there are no issues. From our walkthrough of historic payroll errors highlighted to us by HCPC staff, opportunities to identify and prevent errors (e.g. the delayed return from maternity leave which led to a payroll overpayment) were missed by Heads of Department and other departmental line managers.
- 1.16 Security in Core HR is controlled by the Core Security module within the system, where user access rights can be amended by administrators (e.g. HR Ops team members). This can be used to unlock user accounts that have been locked out due to multiple failed login attempts and also to grant privileges to new employees in the organisation. Access to the Access Collaborate system is also password-protected. Changes to access can be amended by contacting Core Bureau. During testing we noted that HR and admin level capabilities can be provided to any HCPC employee without further approvals in the Core HR system and without oversight from senior management, which creates a risk that access privileges can be granted without proper oversight.
- 1.17 We also noted Core HR user access rights currently require manual verification checks within Core HR to ensure the veracity of the reports generated by the system, as the information within the reports generated does not align to system access rights observed in practice.
- 1.18 From our audit work we have made one “Priority 1” recommendation and two “Priority 2” recommendations:
- We noted that any user with HR access rights within the Core HR system can grant the higher level access rights of a HR Manager to other individuals, even if those job roles are not linked to HR. HCPC should introduce a standard regular review of access privileges within the Core HR system to ensure that access to potentially sensitive HR and payroll information is appropriately restricted.
  - Currently HCPC Heads of Department only respond on an exception-only basis to monthly payroll checking emails. HCPC should strengthen this control to require positive confirmation from relevant Heads that the payroll is correct to their understanding.
  - Finally HCPC should update the PT-X payment platform, and the BACS authorised trustee list accordingly, to ensure sufficient senior coverage for processing payments in the event of a key staff absence.

#### Recommendations summary table

- 1.19 The following table summarises the recommendations made across the key risks audited, grouped by priority ratings:

Key risk area	Rating	Recommendation Priority rating		
		1	2	3
1 Payroll policies and procedures	Green	-	-	1
2 Accurate information within Core HR	Green	-	-	-
3 Timely amendments to Core HR data	Green Amber	-	-	-
4 Information provided to Core Bureau outside of Core HR	Green	-	-	-
5 Exception reporting, internal checking and supervisory controls	Amber	-	2	1
6 Unauthorised accessibility to Core HR data	Amber	1	-	-
Total recommendations made		1	2	2

1.20 The following tables in Section 2 Key Findings show the results of our analysis by each key risk area. Areas for improvement are highlighted with the key recommendations in the right-hand columns.

## 2 Key Findings

Key Risk Area 1: Payroll policies and procedures

Assessment:

Green

### Background

Appropriate policy documentation dictates the parameters under which the organisation operates in certain business functions, with procedural documentation providing guidance and detail to staff on the specific tasks to be undertaken. Without clear policy and procedure documentation there is a risk of an inconsistent approach followed when performing key tasks leading to errors.

### Findings & implication

#### Positive findings

- A Payroll Manual is in place, which clearly sets out the responsibilities of the HR Ops team in regards to payroll processing. This includes how to run reports, and calculations relating to sick pay as well as other pro-rata adjustments that may need to be made when processing changes to the payroll.
- Payroll-related policies, such as the pay policy and the overtime policy, are available for all staff to view on the HCPC intranet. These are also available for HR staff in the HR network folders.

#### Areas for improvement and implication

- The PG200 (Council Members') payroll process is not documented in any payroll procedures or policies held by HCPC. This payroll is processed by Finance, and HR Ops are not involved with the processing of this. The process is known to the Financial Control Manager and the Financial Accountant, however the HCPC staff interviewed noted there was no documented procedure for the monthly work carried out by Finance. While we found no issues with our wider compliance testing in this area, the risk is that the monthly payroll process may not be processed correctly as there is no reference documentation to refer to.

### Recommendation

1. HCPC should formalise the Finance related payroll processing activities in a documented procedure, which can align with the payroll manual and be referred to by both current and future Finance staff.

Priority 3



### Management response

Accept

Action: To produce a payroll processing manual to formalise and document the actions the Finance Dept has to take to process payroll.

Action Owner: Interim Head of Finance & Financial Control Manager

Completion date: 30 June 2021

Key Risk Area 2: Accurate information within Core HR

Assessment:

Green

Background

Reliable payroll information originates from the standing data held within the system, and the underlying source documentation that can be referenced to corroborate this information as accurate. HCPC retains source documentation in its network drive folders and updates Core HR when necessary, with information regarding changes through the Manager Requests function in Core HR.

Findings & implication

Positive findings

- An automated workflow system within Core HR called Manager Requests allow changes to processed in the system through defined workflows to ensure the correct approvals are granted. These workflows were implemented by Core Bureau with HCPC input and are known to HCPC. We reviewed 10 standing data changes within the Core HR system conducted via the Manager Requests workflow route, no exceptions were noted in the workflows within the Core HR system.
- Source documentation is retained by HCPC regarding all changes to standing payroll and HR data within Core HR. This information is retained in the HR network drive folders and accurately reflects the information present in Core HR. We tested 10 current employees and confirmed their standing data relating to initial contract role and salary amount were accurately recorded in Core HR with reference to source documents.
- Core HR prevents any user from editing employee files as the system has user access rights due to role specific requirements as a security measure, and it also has audit trail capabilities that allow HCPC to demonstrate who approved changes to employees' files and when the change occurred.

Areas for improvement & implication

- None.

Recommendation

None



Management response

N/A

Key Risk Area 3: Timely amendments to Core HR data

Assessment:

Green Amber

Background

Payroll changes can occur throughout the month, and changes not processed in a timely manner will mean employee's pay may be lower than expected and may cause financial issues for employees. The Core HR system has a notification system that allows user to see when they have tasks to complete, and HCPC also have audit trail capability within the Core HR system to monitor when changes were made to validate their adherence to timely processing.

Findings & implication

Positive findings

- New starters are processed via the Managers Request workflow system, which automatically notifies users through the Core HR system of outstanding actions they may have in order to process the changes quickly and effectively. We reviewed a sample of 10 new starters to assess timeliness of processing and whether the information was updated correctly. We noted no exceptions in our testing.
- Leavers are processed via the Manager Request workflow system, and can only be raised by their reporting line manager. Once raised, the request follows a system defined process to be approved, and triggers a notification to IT to deactivate the user after their leaving date to avoid data security issues. We reviewed a sample of 10 leavers to assess whether the leaver forms were processed in a timely manner and prior to the end date of the employee. We noted no exceptions in our testing.
- Finance liaise monthly with Governance to gather relevant information regarding pay for PG200 council members. This payroll processing is undertaken solely by Finance, and is reconciled alongside the PG100 payroll, including gross to net pay analysis for verification purposes. Prior to processing the payroll, the Head of Governance checks the payroll to be processed to ensure they are satisfied with the figures. We reviewed three months payroll processing for approval from the Head of Governance regarding the PG200 payroll processing. We noted no exceptions in our testing.

Recommendation

Please see recommendation 2 below.

Management response

N/A

Findings & implication	Recommendation
<p data-bbox="159 215 1314 247"><b>Areas for improvement &amp; implication</b></p> <ul data-bbox="159 247 1314 598" style="list-style-type: none"><li data-bbox="159 247 1314 486">• While the proposed monthly pay reports are sent to relevant HCPC line managers to confirm their accuracy and thus identify any exceptions or errors, we noted that these departmental level controls rely on relevant managers reviewing reports and contacting HR teams if any issues are identified. Examples of recent payroll issues highlighted by management included one example in 2017 (unpaid maternity leave not flagged to HR, overpayment circa £3,500) and another example in 2020/2021 (leaver was not flagged to HR, overpayment circa £3,250). Both instances were not flagged to HR by managers in the respective employee's department.</li><li data-bbox="159 486 1314 598">• The risk is that without stronger confirmatory checks in place, HR staff processing monthly payroll may not be aware of changes to individual circumstances which have not been updated in Core HR leading to errors in processing payroll.</li></ul>	

Key Risk Area 4: Accuracy of the information provided to Core Bureau outside of the Core HR system

Assessment:

Green

Background

System driven processes provide greater assurance of errors being detected, however robust checking processes can minimise the errors produced in aspects of manual reporting. HCPC use Payroll Check Reports provided through the Oracle BI system to verify the information provided to Core Bureau through the Access Collaborate system, is an accurate representation of information uploaded to Core HR.

Findings & implication

Recommendation

Positive findings

- HR Generalists use Payroll Check reports generated from the Oracle BI system (reports created by Core Bureau, adapted by HCPC) to corroborate the information in the Core HR system against the manual information entered into the PG100 spreadsheet.
- HR Generalists confirm the checking of the PG100 spreadsheet against the Payroll Check report to validate the checks as complete by emailing the "DL Partners and HR Ops" email group, which includes the Head of Partners and HR Ops. Once the checks being completed come back without any variances, the information is uploaded to the Access Collaborate system. We reviewed evidence of the checks conducted across three months in the last 12 months, and noted evidence of the HR Generalists communicating regarding changes to the PG100 spreadsheet that need to occur prior to the information upload to the Access Collaborate system.

None



Management response

N/A

Areas for improvement & implication

- None.

Key Risk Area 5: Exception reporting, internal checking and supervisory controls

Assessment:

Amber

Background

Robust checking procedures help mitigate the risk of unexplained variances, false positive checks and decrease the detection risk across the process. HCPC employ a number of exception reporting, variance checks and supervisory controls throughout the monthly process to validate the payroll figures paid each month.

Findings & implication

Positive findings

- Gross to net pay comparisons with previous months are provided by Core Bureau on a monthly basis and reviewed by the HR Ops team and the Finance team to investigate variances and ensure the payroll in the current month has been processed correctly across both PG100 and PG200 payrolls.
- Departmental Validation Check reports are sent monthly asking Heads of Department to check their respective department's payroll file for any discrepancies, and to contact HR Ops with any queries or exceptions. The files are saved down in separate folders for each department to reduce the unnecessary visibility of sensitive data.
- Each month, the Director of HR, Director of Finance and Head of Partners and HR Operations receive an email from the Finance department stating the PG100 net payroll amount, PG200 net payroll amount and the prior month's P30 NI and Tax payment amount. A link to the supporting calculations are provided for each gross to net summary.

Areas for improvement & implication

- While the proposed monthly pay reports are sent to relevant HCPC line managers to identify any exceptions or errors, we noted these were responded to on an exception-only basis by relevant Heads of Department. We were informed that, for the three months reviewed, over 80% of Heads of Department did not respond to the email. The risk is that with issues such as the overpayments occurring in recent years and with managers within departments having better line of sight of the changes amongst staff, there is the possibility for further mismanagement of HCPC's resources in regards to payroll expenditure due to ineffective controls in place.

Recommendation

2. HCPC should strengthen the controls where Heads of Department review monthly pay reports for their areas. Heads of Department should be required to positively confirm that there are no factors outside of the Core HR system that could influence monthly payroll (eg voluntary extension of maternity leave), rather than confirm on an exceptions basis. Any changes should be approved and updated in the Payroll Manual.

Priority 2

3. HCPC should ensure Core Bureau authorise additionally the Director of Corporate Services and Financial Consult to the PT-X payment platform, and update the BACS authorised trustee list accordingly.

Priority 2

4. HCPC should amend the financial scheme of delegation to include the authorised persons for payroll transactions, and keep this in line with the PT-X platform list of approvers. Any changes required to the PT-X platform where a new role is required to be added should be replicated in the financial scheme of delegation via consultation with the Senior Management Team.

Priority 3



Management response

Findings & implication	Recommendation
<ul style="list-style-type: none"> <li>Currently, the BACS Trustee list contains three senior members of the HR Directorate and only one senior member of the Finance Directorate. However, one member of each Directorate is required to approve the payroll in the PT-X payroll system, and HCPC have noted there have been issues approving the payroll in the past when members of staff are away and not contactable. This could delay the processing of payroll transactions should key staff be unavailable.</li> <li>The current financial scheme of delegation does not contain mention or reference to who is authorised to approve or action the payroll transactions at HCPC. This is inconsistent with other areas of operational expenditure as the monthly payroll authorisation is roughly £600,000.</li> </ul>	<p>Accept</p> <p>Action: Email template to review departmental check reports has been amended and issue has been discussed with HoSs. A further follow up email is required to ensure that all HoSs understand the requirements fully. Deputies will need to be nominated and a full schedule released.</p> <p>Action Owner: Uta Pollmann Completion date: 12 June 2021</p> <p>Accept- Change of procedure</p> <p>Action: Since the audit, CoreBureau has changed its system and no longer uses PT-X. They now send across an authorisation form and we compare the totals for PG100, PG200 and P30 with the totals provided by Finance. CoreBureau conducts all other checks for us. The Director of Corporate Services and the Interim Head of Finance have now been added to the BACS authorised trustee list.</p> <p>Action Owner: Uta Pollmann Completion date: Completed</p> <p>Accept</p> <p>Action: As explained above. CoreBureau decided to no longer use PT-X.</p> <p>Action Owner: Uta Pollmann Completion date: Completed</p>

Key Risk Area 6: Unauthorised accessibility to Core HR data

Assessment:

Amber

Background

Controlling access to the HR & Payroll system is key to ensuring data security measures are upheld and data breaches avoided, whether by HCPC and/or Core Bureau as the 3<sup>rd</sup> party outsourced provider. Core HR access is controlled by the Core Security module within the Core HR system. User access rights can be granted by authorised employees from this module and employee accounts can also be locked/unlocked from this area.

Findings & implication

Positive findings

- HCPC has a defined control environment regarding password access to the Core HR system and user access rights that prevent any user from making any change without having the defined system permissions required to do so.
- Core HR has a specific module (Core Security) which dictates the access controls for all users, and allows HCPC to readily change the access rights of individuals, particularly in instances of new starters to the HR Directorate that require access to more sensitive information than other employees.

Areas for improvement & implication

- HR capabilities within Core HR can be provided to employees without further approval or oversight. We noted that any user with the appropriate user access rights can grant any of the access rights of a HR Manager to other roles, even if those job roles are not linked to HR. Any changes made to user access rights are not currently traceable in the system easily, and could only be noted through manual verification of a single employee's user access rights (there are circa 250 HCPC employees). The risk is that HCPC is unaware of who has what levels of access when there is a change, as this does not have to be approved by another user, and therefore unauthorised employees could gain access to sensitive information.
- Standardised user access reports generated by the Core HR system are not currently well understood within HCPC to be able to provide accurate information regarding user access rights within the Core HR system. Audit testing also showed that the HR & MI Officer did not appear to have basic user access rights per the report. However, we noted they exhibited management level control throughout walkthroughs during the fieldwork. Without clear reports showing access rights within the system it is more difficult to monitor whether access rights for current (or indeed former) staff is appropriate.

Recommendation

5. HCPC should contact Core Bureau to check the feasibility of reviewing the user access rights within the system and seek to understand whether audit reports to allow full oversight of access rights, and also change reports showing users with differing access levels within the Core HR system, can be developed.

Regular reviews of access privileges, and changes to access privileges, should be undertaken to ensure that access rights remain appropriate for HR staff members' roles.

In the event that system generated checks are not possible, a suitable manual workaround (such as manual checking of user privileges) should be introduced to ensure that user access to HR and payroll information is appropriately restricted.

Priority 1



Management response

Accept

Action: We have contacted CoreBureau to explore the options we have to facilitate the above recommendation.

Action Owner: Uta Pollmann

Completion date: 1 July 2021

## A Audit objectives, Risks & Scope

Terms of reference	
Objectives	The objective of the audit is to provide assurance that the HCPC's payroll process have been designed appropriately and that key risks relating to payroll are being managed effectively.
Key risk areas	<ul style="list-style-type: none"> <li>• Adequate payroll policies and procedures, including distribution and adherence</li> <li>• Accurate information held within the Core HR system</li> <li>• Timely amendments to Core HR data, notably in relation to new starters and leavers</li> <li>• Accuracy of the information provided to Core Bureau outside of the Core HR system</li> <li>• Adequate exception reporting, internal checking and supervisory controls</li> <li>• Unauthorised accessibility to Core HR data</li> </ul>
Scope	<p>We will assess whether payroll policies and procedures have been regularly updated and approved, and whether high-level descriptions of processes are consistent with current practice.</p> <p>We will also seek to test the accuracy of information held within Core HR with reference to source documents (such as employment contracts). We will seek to identify whether starters, leavers and other causes of changes to Core HR data have been actioned promptly, accurately and that access to Core HR data is restricted appropriately.</p> <p>The audit will finally focus on checking and approval processes within HCPC to review proposed pay runs and assess whether final approvals are in line with appropriate segregation and financial schemes of delegation. We will also examine what third party assurances HCPC receives from its payroll provider (eg ISAE 3402 controls reports).</p>
Approach	<p>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.</p> <p>Our work will focus on the operation of controls over the processing of HCPC's payroll. Our detailed testing will be undertaken on a sample basis and will therefore only seek to provide reasonable, but not absolute assurance over payroll processing. We will not re-perform individual payroll calculations but we will assess the design and effectiveness of controls at HCPC to pay staff correctly.</p>

## B Audit definitions

Opinion/conclusion	
 (Green)	Overall, there is a sound control framework in place to achieve system objectives and the controls to manage the risks audited are being consistently applied. There may be some weaknesses but these are relatively small or relate to attaining higher or best practice standards.
 (Green-Amber)	Generally a good control framework is in place. However, some minor weaknesses have been identified in the control framework or areas of non-compliance which may put achievement of system or business objectives at risk.
 (Amber)	Weaknesses have been identified in the control framework or non-compliance which put achievement of system objectives at risk. Some remedial action will be required.
 (Amber-Red)	Significant weaknesses have been identified in the control framework or non-compliance with controls which put achievement of system objectives at risk. Remedial action should be taken promptly.
 (Red)	Fundamental weaknesses have been identified in the control framework or non-compliance with controls leaving the systems open to error or abuse. Remedial action is required as a priority.

Any areas for improvement are highlighted with the key recommendations in the right-hand columns. The symbols summarise our conclusions and are shown in the far right column of the table:

Good or reasonable practice	
An issue needing improvement	
A key issue needing improvement	

Recommendation rating	
Priority ranking 1:	There is potential for financial loss, damage to the organisation’s reputation or loss of information. This may have implications for the achievement of business objectives and the recommendation should be actioned immediately.
Priority ranking 2:	There is a need to strengthen internal control or enhance business efficiency.
Priority ranking 3:	Internal control should be strengthened, but there is little risk of material loss or recommendation is of a housekeeping nature.

## C Staff consulted during review

Name	Job title
Ewan Shears	Governance Officer
Uta Pollmann	Head of Partners & HR Operations
Ambia Khatun	HR & MI Officer
Suellen Vassell	Financial Control Manager

We would like to thank these staff for the assistance provided during the completion of this review.

FOR MORE INFORMATION:

SARAH HILLARY

[Sarah.Hillary@bdo.co.uk](mailto:Sarah.Hillary@bdo.co.uk)

Freedom of Information  
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