




# Internal Audit Report

## Executive Office – Electoral Registration 2020/21

### Plymouth City Council

March 2021

Service Objective	
To discharge the Council's obligations in providing effective Electoral Services to its Citizens.	
Audit Opinion	Direction of travel
<b>Reasonable Assurance</b> There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.	

Assurance Opinion on Risks or Areas Covered	Level of Assurance	Direction of travel
<b>- key concerns or unmitigated risks</b>		
<b>Remediation of Historic Errors</b> – Remedial Actions taken in respect of historic incidents and errors have been effective.	Reasonable Assurance	
<b>Process and Data Controls</b> – Process controls ensure that data integrity and accuracy is effectively maintained.	Reasonable Assurance	
<i>These areas / risks combine to provide the overall audit assurance opinion. Definitions of the assurance opinion ratings can be found in the Appendices. The observations and findings in relation to each of these areas has been discussed with management, see the "Detailed Audit Observations and Action Plan" appendix A. This appendix records the action plan agreed by management to enhance the internal control framework and mitigate identified risks where agreed</i>		

## Introduction

A range of administrative issues occurred prior to, and during, the 2017 General Election, with the most significant being the problems experienced revolving around postal voting. Immediately following the 2017 General Election, the Council commissioned Dr David Smith\* to investigate what happened and why so that lessons could be learned. The resulting report formed the basis of the Council Action Plan from which a range of internal work streams were created and resourced.

In the lead up to the December 2019 General Election it was identified that erroneous entries had been included on the three parliamentary electoral registers administered by Plymouth's Electoral Registration Officer (ERO). Once again, prompt action was taken and the Council sought the advice of Peter Stanyon, the CEO of the Association of Electoral Administrators (AEA). The significance of the problems experienced required the ERO to seek the advice of other EROs, the Council's legal team and, for the Returning Officer (RO) to notify and meet with the Electoral Commission.

Peter Stanyon, and his colleague Angela Holden, have recently been commissioned to provide further independent review of the processes for administering the Electoral Register with a view to creating an environment of 'Zero Tolerance' of avoidable errors. As part of this exercise, a discussion was held to help form the scope of the work that Devon Audit Partnership (DAP) would undertake so that resources were used in the most appropriate and effective way.

In order to complement the most recent report provided by the AEA, work has specifically been undertaken to assess the robustness of the Electoral Registration process control environment. Particular attention has been paid to the controls used as part of the multiple end-to-end data streams that are used to populate the Local and National Electoral Registers.

The legislative requirement for the Council to optimise the number of its eligible residents who are registered and thus eligible to vote represents a significant change from the historic emphasis upon prospective electors to register and vote. Modernising citizen engagement is essential to ensure that reach and electoral education are effective and assist the Council in fulfilling its obligations.

The work conducted by DAP looks to provide additional assurance that the remedial action taken in respect of the electoral problems and issues of the past three and a half years has been effective. Specific attention has been paid to the registration issues impacting the December 2019 General Election, administrative processes and Quality Assurance (QA).

## **Executive Summary**

It is pleasing to report that the efforts taken to remedy the errors made within the Council electoral registration processes between April 2017 and December 2019 have been largely effective. The strength of the governance process, in particular, provides a high level of assurance that lessons have been learnt and appropriate remedial action taken or, where ongoing, suitably monitored.

The level of transparency and use of independent subject area experts also is worthy of note and also contributes strongly to assurance. Subject area expertise has been used to provide independent appraisal of incidents and occurrences, and, the registration processes in place. The observations and learning provided by both internal and external review further strengthens top to bottom governance in respect of overall process and understanding.

As a result of the report produced by Dr David Smith in September 2017, extensive work was undertaken to develop and fulfil a formal Service Improvement Plan. The formal Service Improvement Plan contains an Action Plan that was last reviewed on 1st July 2020 by the Head of Electoral Services. Progress against a limited number of actions remain 'ongoing', with one of these actions considered by the Auditor to be largely completed.

The 2017 Improvement Plan is now largely obsolete due to the number of completed and historic actions. However, it would be beneficial to review and utilise the principles and purpose behind the actions to inform ongoing service improvement and risk management. A periodic review process that includes the ARO and other key stakeholders should be considered to drive continual service improvement and re-invigorate progress where targets have not been met.

There are now multiple layers of control to prevent the re-occurrence of the December 2019 issues that revolved around the erroneous entries included on the parliamentary electoral registers. Internal and external data are now only used to add electors as "pending electors", whereas the previous issues were caused by the names in the data being passported as electors without the individuals having applied themselves to be registered.

A series of controls are now complied with to ensure that pending electors fulfil all necessary requirements for their inclusion on the electoral register and subsequent right to vote. Following completion of the Canvass and formal submission/publication of the Electoral Register, a series of checks are performed by Electoral Services staff. The Electoral Register is also subject to an independent check by officers of appropriate status and skill sets to ensure no repeat of the previous issues and, to verify that records have the correct dates and markers.

The issue of including young prospective voters on the Electoral Register prior to meeting eligibility (18 years old on the date of the election) has also been appropriately addressed. In addition, all elections staff and independent quality assurance officers are fully aware of a control weakness in the Civica Xpress

Electoral Management System (EMS) system that does not utilise the prospective voters' Date of Birth (DOB) within its programmed eligibility controls. Checks are also made to ensure that all necessary data fields are complete and that all entries on the Electoral Register are evidenced as appropriate within Civica Xpress. The latter control applies the Electoral Register as a whole.

Electoral Services have been effective in ensuring that lessons of the past have been learnt and applied, but it must ensure that it continues to look forward so that all risks are identified on a timely basis and appropriately mitigated. The review of process and QA proposed by AEA should be harnessed to provide better transparency of process risks and provide greater assurance to Senior Management. Any process reviews should be used to further knowledge, benefit team communication and, further evolve an ethos of compliance and quality.

To complement the work and findings of AEA, DAP focussed on the systems in place to administer electoral data and the building of internal knowledge regarding the process risks and controls. Whilst individual controls are generally of a good standard, DAP strongly support AEA's recommendations for Electoral Registration staff to conduct a review of processes. In accordance with AEA's recommendations, DAP will also perform a review of the revised processes to provide Senior Management with further assurance.

Further work to improve processes and mitigate associated risk and control have rightly focussed on elevating the confidence of all stakeholders in the Electoral Registration system. Electoral Services are currently operating under increased scrutiny to mitigate risks in an environment of heightened reputational risk due to the historic errors and incidents. Operational processes must, therefore, be designed to reflect the need for greater assurance.

The review confirmed that opportunities remain to improve existing QA processes and enhance their value. Whilst QA as referred to within the AEA report is being conducted, the Auditor considered that those in place operated largely as controls and were not fully effective in terms of providing process assurance and contributing to quality. Appropriately designed QA processes should be harnessed to provide Senior Management with significant assurance that operational activities are compliant with agreed process and procedures.

The Council's pending Digital Strategy will form the basis for improving and increasing online interaction with residents within the City. Electoral Services have already implemented aspects of the Xpress EMS that enable two-way electronic engagement with local residents in respect of both registration and the Annual Canvass of Electors processes.

Whilst there are risks associated by changing processes, engaging with existing and prospective electors electronically better mirrors the overall customer experience in obtaining services and goods in their everyday activities. Crucially, by making registration processes easier and more familiar the Council goes a long way to fulfilling the requirement to maximise registration.

The Civica Xpress EMS has many strengths as would be expected from a solution that maintains contractual obligations with the Cabinet Office. However, the audit review identified that there are potential weaknesses in terms of the way in which it imports data and in its internal data flows. The identification of risks at each point data is moved from one state or location would help ensure that any weaknesses can be supplemented with additional controls.

Electoral Services team must also guard against making processes so restrictive that they consume a disproportionate amount of operational resource. Each control must be at an appropriate level and effective QA processes must enable compliance to be clearly demonstrated. In addition to reviewing operational processes team members should have their knowledge of risks and how these are mitigated strengthened. This would provide control through understanding and team ethos, and help evolve a more organic control environment

## **Findings & Observations**

### **Governance**

Electoral Services should continue to look at ways to improve the way in which services are delivered. In terms of governance, opportunities are minimal, yet fundamental, being largely limited to the ongoing development of skill sets, knowledge and communication.

Electoral Services benefit from the experience, wisdom and combined attributes provided by their senior members of staff. However, some members of the team remain relatively inexperienced and will benefit from ongoing learning. The review identifies that many of the process controls used in administering electoral data ultimately rely on staff judgements, and this is an area that needs to be strengthened. What may be considered to be marginal improvements in each area of operation would strengthen the overall control environment.

Within the control environment, process risks and the controls required to mitigate them constantly change (for example, the move from paper based systems to a more electronic and bulk data driven process as well as a change in skills and understanding of associated risks). All process reviews should involve the Electoral Services team as a whole, not only to benefit learning, but to strengthen team working, mentoring and communication.

Throughout the audit review process, we recognised a strong commitment to fulfilling the Council's obligation to maximise the number of electors and to comply with statutory requirements and associated electoral standards. Staff are expected to seek guidance whenever unsure about a point of process so that operational decision making is compliant and consistent.

The Electoral Service Library contains multiple document hyperlinks that the Auditor was unable to use to visit the primary documentary guidance. The 'knowledgebase' provided by the 'Library' is an important mechanism for ensuring standards and compliance and should be maintained to encourage its use.

### **Civica Xpress EMS**

The market leading Civica Xpress EMS provides an effective and compliant electoral solution that has enabled the Council to modernise the means of interaction with the City's electorate.

Civica Xpress EMS assists the strengthening of regulatory compliance and in the meeting of standards. This is achieved by the way the solution is designed and written and importantly all version changes require 'sign off' from the Cabinet Office prior to their release to client local authorities.

Both the solution design and associated guidance help provide consistency on both a local and national level. The solution helps 'hand hold' users in managing elector data in a legislatively compliant way and uses prompts to highlight where actions potentially deviates from this. The level of documented guidance that supports the solution was found to be of a high quality and sufficiently detailed. The extensive and well-structured online documentation provides users with both pictorial process maps and in granular narrative.

The review identified that the transfer of electoral information and data between the national and local registers does not benefit from traditional and transparent batch transfer controls that validate the movement of data between systems. The use of computerised scripts and workflows distribute data to specific areas of the Xpress solution pending manual intervention and further distribution as appropriate. Compensating controls are relied on to provide assurance that data is transferred and received completely and with full data integrity.

At a national level, the compensating controls exist in the form of the contractual relationship between Civica Xpress and the Cabinet Office in providing a robust and legislatively compliant solution to the 300 plus local authorities that use it. The very large client numbers should provide an effective means of identifying any anomalies in data processing activities. However, these controls rely on Civica Xpress to identify and inform the Council of any processing errors that may potentially impact the integrity of the Council's Electoral Register.

The import of data from third parties remains challenging and is an area that would benefit from a more thorough understanding of the risks involved within Electoral Services, so that the controls are effective, efficient and proportionate to the risk. The lack of traditional batch controls within Civica Xpress requires the use of locally designed control processes. These require further development to ensure that the integrity of all data imported is maintained and that records are updated appropriately.

Strong Management/ Audit Trails exist within the Civica Xpress system to record who actioned what and when. Furthermore, evidence to validate the elector's right to vote is maintained within the Civica Xpress business solution and build histories against individual residencies.

## The Control Environment & Key Control Mechanisms

The complex and ever changing operational risk environment in which the Council must deliver its services presents administrative and resourcing challenges that represent risks in their own right. In reality, it is impossible for any service to formally recognise and mitigate all risk at every level of its strategic and operational processes within the finite resources available.

The need for Covid safe elections in May 2021 presents additional challenges and associated risks. Even with widespread vaccination within the population it is unlikely that the electoral process would be totally free of infection related risks and needs to be managed accordingly. This will not only consume administrative resources, but also potentially dilute focus.

Within a service's overall control environment, process risks, and thus the controls required to mitigate them, also change. The greater use of electronic data to gather, store and administer electoral registrations, provides significant advantages, not least because the elector is effectively providing their details verbatim without the risk of input error. However, additional risks are associated with data integrity and information governance and these require full understanding and the creation of new control processes if a 'zero tolerance' approach is applied.

As previously stated, Electoral Services benefit from strong governance processes, but these are further strengthened when risks are understood instinctively. Existing control processes and the overall control environment in which they operate are generally robust. This said, it is clear that the sheer number of electors and the wide variations in their respective circumstances create operational challenges in ensuring legislative compliance and in maintaining data integrity. This is why it is important for all staff to continually develop their knowledge and understand what controls exist to safeguard compliance and data integrity.

Having the right combination of collective skill sets and working culture strongly enhances the control environment beyond those simply provided in the form of granular procedural detail. Senior Management should ensure that any review of electoral processes provides opportunity to develop and enhance learning within the electoral service. This also helps fulfil the requirement of the AEA report regarding the review and ownership of registration processes by the Electoral Registration Team.

Most value will be obtained if all controls operating within processes are identified and highlighted in order to provide transparency and understanding to all involved. As part of the review process DAP have discussed existing controls with the Registration, Data and Performance Manager and highlighted where they exist in full or, compensating within a wider control environment. DAP agreed with the Head of Electoral Services that they will provide a Risk And Control workshop for the Electoral Team prior to the internal review of processes. Two training workshops have now been completed by Electoral Registration staff and the associated learning assignments undertaken have also been captured to aid the review process.

Secondary independent checks and use of checklists were identified as being in place. However, the more extensive use of these control mechanisms should be strongly considered as well as their potential use to provide Senior Management with further quality assurances.

Whilst at the time the Internal Audit review commenced two positions were vacant, limiting available resources, these position have now been advertised with appropriate attributes being detailed within job descriptions and 'person spec'. As discussed within this report, staff resources should always be optimised through recruitment, learning and continual improvement.

The review performed a high level examination areas of control which included:

- Data transfer between local and national registers;
- The Canvass;
- Processing within Xpress;
- Special category electors;
- Maintaining property records;

- Third Party Data;
- Printing.

Within control areas identified above, specific attention should be paid to the operational actions that move data from one state or location to another. The risks should be understood and the controls in place identified and strengthened where necessary. This will provide procedural clarity and understanding for staff, as well as transparency and assurance for Senior Management.

### **Information Governance**

The Electoral Register provides a definitive list of names and addresses, data that is highly sensitive with some particularly at risk requiring complete anonymity. The Electoral Registration Services Risk Register identifies and demonstrates evidence of appropriate mitigating actions.

The risk environment is constantly changing, and so periodic revision of risk registers should continue. Further discussions are to be had regarding the computerised risks which are currently not separately identified. However, these may already be appropriately mitigated with operational processes currently undertaken by Delt.

### **Quality Assurance (QA)**

The points made in this section relate to opportunities to the provision of assurance around end-to-end administrative processes. However, these are likely to provide supplementary assurance which may differ from electoral QA best practice upon which existing processes should be measured.

AEA have confirmed that the QA (control of) significant events to be effective and even to be considered exemplars. Once again, as part of process and QA reviews, consideration should be given to optimising the value of these significant event QA processes where possible.

It must be recognised that QA means different things to different organisations, services and functions, as well as individuals. Therefore, it would be beneficial to all stakeholders for an Electoral Services operational QA definition. As an example, baseline statement for operational QA could be provided by defining:

- Quality - as maintaining and enhancing Senior Management's expectations of operational quality, and;
- Assurance - to be the process of providing stakeholders of demonstrable compliance with agreed internal administrative processes and standards.

Wherever appropriate it would be beneficial for the control process to contribute to the quality assurance process and, as such, process and QA reviews should be performed in parallel. Where controls both mitigate risk and contribute to management assurance there may be opportunities to capture this information within the QA process.

The recommendations regarding these issues are described in Appendix A. Recommendations have been categorised to aid prioritisation. Definitions of the priority categories and the assurance opinion ratings are also given in the Appendices to this report.

### **Issues for the Annual Governance Statement**

The evidence obtained in internal audit reviews can identify issues in respect of risk management, systems and controls that may be relevant to the Annual Governance Statement. No such issues were identified.

**Robert Hutchins**  
**Head of Partnership**

## Detailed Audit Observations and Action Plan

1. Risk Area: Remediation of Historic Errors - Remedial Actions taken in respect of historic incidents and errors have been effective.			Level of Assurance  <b>Reasonable Assurance</b>
<b>Opinion Statement:</b>			
<p>The Council has done everything that would be expected of it to learn and remedy historic errors within its Electoral Service activities. The high standard of governance and use of independent subject area experts to help form remedial actions plans contribute to what amounts to 'Substantial Assurance'. Control processes to ensure that pending electors fulfil all necessary requirements for their inclusion upon the Electoral Register are now significantly more robust. Furthermore, there is a greater and wider understanding of the weaknesses that led to the previous erroneous inclusions. However, the occurrence of a limited number of errors in the period between June 2017 and November 2020 necessitate the assessment that there is 'Reasonable Assurance' in this area.</p> <p>The Civica Xpress EMS provides a high level of control in respect of electoral practice and fulfilling obligations and opportunities to optimise the number of Citizens registering their right to vote.</p>			
No.	Recommendation	Impact / Priority	Management Response
1.1	Review the formal Improvement Plan created in response to the September 2017 issued by Dr David Smith. Utilise the principles and purpose behind the actions to inform ongoing service improvement and risk management.	Low	<p>The July 2020 Service Improvement Plan has been reviewed and updated to incorporate the recommendations made in the AEG and DAP reports. This will ensure that there is one record for all recommendations and actions. All actions taking in response to recommendations will be recorded in order to provide a clear audit trail.</p> <p>Responsible Officer: Head of Electoral Services Target Date: Actioned</p>
1.2	Consider introducing a periodic review process to drive continual service improvement and re-invigorate progress where targets have not been met.	Medium	<p>Periodic review and amendment/revision of existing action plans will be scheduled to coincide with major registration and election activities e.g. pre-Canvass and post-Canvass, pre-publication of nomination and polling station registers. Formal reviews will initially occur on a quarterly basis with progress made in respect of service improvement being monitored and reported to The Chief Executive and Assistant Chief Executive.</p> <p>Responsible Officer: Head of Electoral Services Target Date: 31/05/2021 (then Ongoing)</p>
<b>NOTE: Whilst contributing to future assurance in this area, all other recommendations are captured within the section below.</b>			

<b>2. Risk Area: Process and Data Controls (Including QA):</b> Process controls ensure that data integrity and accuracy is effectively maintained.	Level of Assurance  <b>Reasonable Assurance</b>
--	---

**Opinion Statement:**

Process controls are predominantly appropriate and effective. The increased reliance on computerised interaction with local citizens and third parties provides many benefits but changes the risk environment and the specific data integrity risks. The review also confirmed that, whilst the Civica Xpress EMS provides an excellent platform upon which a compliant Electoral Register is administered, there are some process control weaknesses that require understanding and the creation of additional controls to further reduce risk. These weaknesses relate to the use of workflows that do not contain traditional ‘batch’ controls to ensure the appropriate processing of data and the need for high volumes of manual actions. Therefore, the opportunity to review electoral registration administrative processes and the overall control environment in granular detail will be highly beneficial.

There is value to be added to both the levels of assurance for all stakeholders, match controls with the changing risks and benefit learning and knowledge within the Electoral Services Team.

No.	Recommendation	Impact / Priority	Management Response
2.1	Adopt and action the findings and recommendations made within the recent AEA report, reviewing operational and quality assurance processes as appropriate.	High	One encompassing Service Improvement Plan has been produced and is cross referenced to the AEA and DAP reports. This document will be reviewed and updated before and after major registration and elections activities. (See also Recommendation 1.1)  Responsible Officer: Head of Electoral Services Target Date: Actioned
2.2	Prior to the review of operational and QA processes, Internal Audit should provide a Risk and Control workshop for the Electoral Team prior to the internal review of processes.	High	DAP have now provided two “Risk and Control” workshops to the Elections Team. Training provided consisted of an initial two-hour session after which attendees were required to conduct an exercise to apply their learning to three tasks undertaken as part of their electoral duties. The second session was used to discuss the ‘homework’ exercise and to advocate the potential use of RACI (Responsible, Informed, Consulted, Informed) matrices.  Responsible Officer: Head of Electoral Services & DAP Senior Auditor (IT) Target Date: Actioned



No.	Recommendation	Impact / Priority	Management Response
2.3	Require Internal Audit to perform reviews of revised processes and QA mechanisms, as described within the AEA report	High	<p>Current operational processes, process maps and Quality Assurance mechanisms are to be reviewed as follows:</p> <ul style="list-style-type: none"> <li>For electoral registration processes during the canvass – reviewed and updated before and after publication of revised register.</li> <li>For election activities – being reviewed as the processes are being done for May 2021 elections preparation. All processes will be reviewed again, after the elections, as part of lessons learnt process.</li> <li>File/folder management system being reviewed in order to ascertain whether “fit for purpose” as part of the elections preparation and will be reviewed after elections and before canvass preparation in June.</li> </ul> <p>DAP to advise as required and undertake a formal review of all revised procedures.</p> <p>Responsible Officer: Head of Electoral Services &amp; DAP Senior Auditor (IT)</p> <p>Target Date: 30/04/2021</p>
2.4	Utilise the process and quality assurance reviews to benefit knowledge, communication and further evolve an ethos of compliance and quality.	Medium	<p>Process and quality assurance reviews have been incorporated into the Service Improvement Plan. Training, mentoring, communication will be incorporated as part of additional softer controls that are to be explored within the team (including recognising the difference between knowledge and wisdom).</p> <p>Responsible Officer: Head of Electoral Services</p> <p>Target Date: 31/05/2021 (then Ongoing)</p>
2.5	Continue to acknowledge the importance of communication between team members.	Medium	<p>Electoral Services have scheduled team meetings on Mondays and Fridays in which two-way dialogue is encouraged. The wider use of RACI's to better define roles, responsibilities and communication is being explored.</p> <p>Responsible Officer: Head of Electoral Services</p> <p>Target Date: 31/05/2021</p>

No.	Recommendation	Impact / Priority	Management Response
2.6	Ensure that the Electoral Services document Library is updated as necessary, including content and all hyperlinks.	Low	<p>The Elections folder is being managed using best practice and proven filing system used by partner LAs. A review will be conducted after the May 2021 elections to confirm that it remains fit for purpose and to identify what can be done to streamline file management and file naming conventions. Work will commence during April 2021 and be finalised by 31/05/2021.</p> <p>Responsible Officer: Head of Electoral Services Target Date: 31/05/2021</p>
2.7	<p>Define QA to differentiate between operational controls and the provision of formal assurance to stakeholders and the maintenance and enhancement of operational quality.</p> <p>* This may include the controlling of multiple risks through one control activity, operational controls that contribute to QA or, QA to learning.</p>	Low	<p>The issue of what differing quality assurance processes provide was discussed with operational examples as part of the training workshops provided by DAP. This has provided context and allowed the Electoral Services Team to consider how continually improve quality and provide assurance to key stakeholders both individually and collectively. Work to develop more effective operational QA procedures will be conducted as part of the review of operational processes, with QA check processes and reporting being refined during summer 2021.</p> <p>Responsible Officer: Head of Electoral Services Target Date: 30/09/2021</p>
2.8	Capture and analyse positive and negative feedback received from electors (registered or prospective). Use this information to inform process or learning as appropriate, including elector education.	Low	<p>Information is already being gathered from survey, issues log (from Call Centre emails and Firmstep) and Lessons learnt (wash up meetings after every major activity). The Electoral Services Team has a strong ethos of gathering feedback and benefitting from lessons learnt. A BAU activities "Issues and Lessons Learnt Log" has been in place since 2<sup>nd</sup> December 2020. This, and other sources, will be used to identify any operational improvements prior to the pre-planning process for the 2021 Canvass.</p> <p>Responsible Officer: Head of Electoral Services Target Date: 30/09/2021</p>

No.	Recommendation	Impact / Priority	Management Response
2.9	Consider the more extensive utilisation of data analytics (ClearCore, PowerBI) to provide assurance on data quality, provide meaningful measures and provide business intelligence.	Opportunity	<p>Electoral Services will work more closely with the Digital Transformation Team in order to further explore the use of data analytics. The use of more defined working relationships to take advantage of any opportunities presented by the greater use of Clearcore and PowerBI will also be further explored in respect of data quality and quality assurance.</p> <p>The quality of data within Civica Xpress and that provided by feeder sources will be subject to greater scrutiny. This will include format standards and continually improving the quality of data from both within the Council and third party sources.</p> <p>Responsible Officer: Head of Electoral Services Target Date: 30/09/2021</p>

## Inherent Limitations

The opinions and recommendations contained within this report are based on our examination of restricted samples of transactions / records and our discussions with officers responsible for the processes reviewed.

## Confidentiality under the National Protective Marking Scheme

This report is protectively marked in accordance with the National Protective Marking Scheme. It is accepted that issues raised may well need to be discussed with other officers within the Council, the report itself should only be copied/circulated/disclosed to anyone outside of the organisation in line with the organisation's disclosure policies. This report is prepared for the organisation's use. We can take no responsibility to any third party for any reliance they might place upon it.

<b>Marking</b>	<b>Definitions</b>
Official	The majority of information that is created or processed by the public sector. This includes routine business operations and services, some of which could have damaging consequences if lost, stolen or published in the media, but are not subject to a heightened threat profile.
Official: Sensitive	A limited subset of OFFICIAL information could have more damaging consequences if it were lost, stolen or published in the media. This subset of information should still be managed within the 'OFFICIAL' classification tier but may attract additional measures to reinforce the 'need to know'. In such cases where there is a clear and justifiable requirement to reinforce the 'need to know', assets should be conspicuously marked: 'OFFICIAL-SENSITIVE'. All documents marked OFFICIAL: SENSITIVE must be handled appropriately and with extra care, to ensure the information is not accessed by unauthorised people.

## Definitions of Audit Assurance Opinion Levels




## Definition of Recommendation Priority

Assurance	Definition		
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.	High	A significant finding. A key control is absent or is being compromised; if not acted upon this could result in high exposure to risk. Failure to address could result in internal or external responsibilities and obligations not being met.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.	Medium	Control arrangements not operating as required resulting in a moderate exposure to risk. This could result in minor disruption of service, undetected errors or inefficiencies in service provision. Important recommendations made to improve internal control arrangements and manage identified risks.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.	Low	Low risk issues, minor system compliance concerns or process inefficiencies where benefit would be gained from improving arrangements. Management should review, make changes if considered necessary or formally agree to accept the risks. These issues may be dealt with outside of the formal report during the course of the audit.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.	Opportunity	A recommendation to drive operational improvement which may enable efficiency savings to be realised, capacity to be created, support opportunity for commercialisation / income generation or improve customer experience. These recommendations do not feed into the assurance control environment.

### Devon Audit Partnership

The Devon Audit Partnership has been formed under a joint committee arrangement comprising of Plymouth, Torbay, Devon, Mid Devon, South Hams & West Devon, Torridge and North Devon councils. We aim to be recognised as a high-quality internal audit service in the public sector. We work with our partners by providing a professional internal audit service that will assist them in meeting their challenges, managing their risks and achieving their goals. In carrying out our work we are required to comply with the Public Sector Internal Audit Standards along with other best practice and professional standards. The Partnership is committed to providing high quality, professional customer services to all; if you have any comments or suggestions on our service, processes or standards, the Head of Partnership would be pleased to receive them at [robert.hutchins@devonaudit.gov.uk](mailto:robert.hutchins@devonaudit.gov.uk)

### Direction of Travel Indicators

Indicator	Definitions
	No Progress has been made. The action plan is not being progressed at this time, actions remain outstanding.
	Progress has been made but further work is required. The action plan is being progressed though some actions are outside of agreed timescales or have stalled.
	Good Progress has/is being made. Good Progress has continued.