

# TRANSPORT FOR THE NORTH

## Internal Audit Progress Report

**25 February 2022**

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# 1 Key messages

The internal audit plan for 2021/22 was approved at the February 2021 Audit and Governance Committee meeting. As the developments around Covid-19 will continue to impact on all areas of the organisation's risk profile, we will work closely with management to deliver an internal audit programme which remains flexible and 'agile' to ensure it meets your needs in the current circumstances.

This report provides an update on progress against that plan and summarises the results of our work to date.

 We have issued one audit assignment report since the last Audit and Governance Committee meeting held in November 2021. This relates to the Cyber Security (6.21/22) review which concluded that the Board could take 'partial' assurance (one 'high', two 'medium' and three 'low' priority actions agreed). This report is referred to at Appendix A. We have now concluded the internal audit plan 2021/22. [\[To discuss and note\]](#)

 The internal audit plan 2022/23 and three year strategy has been provided as a separate agenda item for consideration by the Committee. The potential areas of coverage have also been discussed with the Finance Director and feedback from the TfN Executive Management Team. [\[To note\]](#)

 We have shared with management a number of briefings and invites. These are outlined in Appendix B below. [\[To note\]](#)

## 2 Reports

### 2.1 Summary of final report being presented to this committee meeting

This section summarises the report that has been finalised since the last meeting.

Assignment	Opinion issued	Actions agreed		
		L	M	H

**Cyber Security (6.21/22)**

Overall, we identified several missing controls which, when implemented correctly, are designed to protect the information systems network operated by TfN.

This review identified one 'high' priority finding which we consider requires immediate management attention. A further two 'medium' priority findings and three 'low' priority findings have been highlighted.

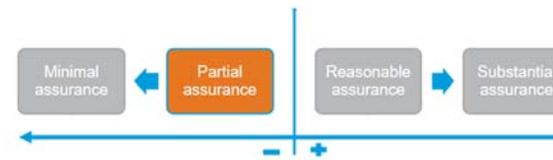
The high priority finding relates to penetration testing which was previously identified in RSM cyber security review 2019/20, which is yet to be scheduled and performed. Without testing being performed, the full extent of vulnerabilities are not known and a risk-based remediation plan cannot be produced. Given the current cyber control environment, the risk of a successful cyber-attack is significantly increased.

The medium priority findings relate to controls for cyber-incident prevention and include:

- The implementation of Intrusion Detection and Prevention tools in the Manchester office;
- The formalisation of policies and procedures to ensure that controls operate consistently (e.g. a formalised staff onboarding and offboarding procedure); and
- The risk acceptance and mitigation is not reviewed on a periodic basis to ensure this remains within risk appetite.

Partial Assurance

3      2      1



## 2.2 Themes arising from control observations in 2021/22 reports

	Low	Medium	High
Planning	0	0	0
Policies and / or procedures	2	0	0
Non-compliance with policies / procedures	0	2	0
Design of the control framework	0	0	0
Training / awareness for staff	0	1	0
Management or performance information	1	0	0
Lack of segregation of duties	0	0	0
Poor record keeping	0	0	0
Risk Management	0	0	0
Governance weaknesses	5	0	0
Information technology	3	2	1
<b>Total</b>	<b>11</b>	<b>5</b>	<b>1</b>

The themes with the highest number of aligned management actions to date are 'Governance weaknesses' and 'Information technology'. It is noted that all five governance related actions related to the Governance Effectiveness Arrangements (2.21/22) review and all IT actions related to the Cyber Security (6.21/22) review.

## Appendix A – Progress against the internal audit plan 2021/22

Assignment and Executive Lead	Status / Opinion issued	Actions agreed			Target Audit and Governance Committee (as per IA plan 2021/22 / change control)	Actual Audit and Governance Committee
		L	M	H		
<b>Follow Up (1.20/21)</b> (Finance Director)	Good Progress	13 of 16 actions completed			July 2021	June 2021
<b>Governance Effectiveness Arrangements (2.21/22)</b> (Director of Business Capabilities)	Reasonable Assurance	5	2	0	July 2021 / September 2021 <sup>1</sup>	September 2021
<b>Risk Management Strategy (3.21/22)</b> (Finance Director)	Substantial Assurance	2	0	0	September 2021	September 2021
<b>Purchase to Pay Framework (4.21/22)</b> (Finance Director)	Substantial Assurance	1	1	0	December 2021	November 2021
<b>Flexible Working Hours Scheme (5.21/22)</b> (Director of Business Capabilities)	Substantial Assurance	0	0	0	December 2021	November 2021
<b>Cyber Security (6.21/22)</b> (Director of Business Capabilities)	Partial Assurance	3	2	1	March 2022	February 2022

<sup>1</sup> This review incorporated the use of a questionnaire issued to TfN Members and Senior Officers to gain insight into TfN's governance arrangements. The questionnaire closing date was extended until mid-June 2021 in agreement with management to provide the opportunity to obtain as many responses as possible.

## Appendix B – Other matters

### On-going liaison and internal audit plan 2022/23

Ongoing liaison has taken place between RSM and the Finance Director throughout the year to discuss progress against the internal audit plan 2021/22; including and not limited to Lisa Randall's one to one meetings with Iain Craven to discuss any TfN updates.

Further to this, RSM's Andrew Mawdsley met with the Finance Director in December 2021 to discuss coverage of the internal audit plan 2022/23. The internal audit plan 2022/23 and three year strategy is presented as a separate agenda item at this meeting for the Committee's consideration and approval.

### Updates, briefings and invites

The following updates, briefings and invites have been issued since the last Audit and Governance Committee meeting:

- Employment Matters (November 2021) – (the topics are summarised below and we have included a link to the full newsletters for further reading);
- Risk Management Deep Dive Guidance (December 2021 – appended below);
- The Modern Workforce report (January 2022 – issued separately);
- RSM's Conformance with the IIA Standards and Codes of Practice (January 2022 – issued separately); and
- We have shared with TfN management details regarding:
  - RSM's NED network event that took place 9 December 2021; and
  - RSM's NED event 'Boredom in the boardroom - how strategic risk management can be a game changer' taking place 10 February 2022.

**Employment Matters – November 2021** - <https://www.rsmuk.com/ideas-and-insights/employment-matters>

**Office banter: protecting your workforce and avoiding discrimination claims** - Several recent bullying and harassment cases have led to intense scrutiny of senior members of organisations for comments and behaviours initially described as 'banter.' 'Innocent' workplace banter has a tendency to stray into uncomfortable areas, and organisations that fail to address this early could face workforce disengagement, costly discrimination claims and, in some cases, irreparable reputational damage. Implement effective policies and procedures.

#### What can employers do to protect their people and themselves from tribunal claims?

Employers should make sure they have in place appropriate policies that make staff aware of:

- the culture of the organisation, including the attitudes and behaviours expected at work; and
- the risk of discrimination claims, which can also be brought against individual employees.

We would recommend an equal opportunities or equality policy that both promotes diversity and inclusion in the workplace and discourages discriminatory attitudes and behaviours. An effective anti-harassment policy should also be implemented so that staff are aware of acts the organisation considers to be harassment. It is crucial to ensure these attitudes and behaviours are embedded across the organisation.

Employers may also soon have a legal obligation to demonstrate what active steps they are taking to prevent sexual harassment in the workplace. A policy and regular training will be critical in meeting this obligation. Staff who feel they have experienced harassment should be encouraged to raise this with their line manager and their concerns should be dealt with via the company's disciplinary and grievance procedures.

Regular training on equality and anti-harassment policies will ensure that employees understand both their own and their employer's rights, duties and obligations. Employees in management positions should be given specific training so that they fully understand how to deal with any issues early, before they escalate into harassment or discrimination claims. It is good practice for equality and anti-harassment training to form part of all workers' induction procedures. This will give staff clear expectations at the outset of the workplace behaviours expected.

Employers can appoint workplace equality champions who can also offer support to employees who have suffered discrimination or harassment. In some cases, victims of bullying, harassment or discrimination may fear speaking up against the perpetrators. As independent and impartial sources of advice, guardians can give employees in those situations the confidence and support to speak up.

**Have you taken advantage of payrolling your benefits?** - Payrolling of benefits in kind was first launched in April 2016. Since then, it has successfully simplified the reporting and payment of taxes for employers and employees alike. From a payroll perspective, it is straightforward to incorporate into payrolls – the key is ensuring that the preparation work has been done first. As the end of the year approaches, now is a good time for employers to consider taking advantage of payrolling benefits. The essential first step is to review the benefits to check they are suitable for payrolling. Advice may be needed to ensure the treatment of each benefit is correct and that payrolling is suitable. Once aligned, registration must be done with HMRC before the new tax year. The benefits can then be set up in the payroll, similarly to other payments and deductions, ready for use from April. While there are benefits, such as reduction in admin with P11Ds, there are some other considerations. We discussed these in our article 'Payrolling of benefits – avoid the pitfalls'.

**Coronavirus: Compulsory vaccination – the employment legal issues** - With businesses seeing more staff returning to the office, many employers will be considering their policies on vaccination and whether they can require their staff to be vaccinated against coronavirus.

#### **Mandatory coronavirus vaccination in the care home sector in England**

All adult care home staff and volunteers must now be fully vaccinated against coronavirus, excluding those who are medically exempt. This will include front line care staff and also tradespeople, hairdressers, beauticians and CQC inspectors visiting the care home. However, this requirement will not extend to friends and relatives visiting a resident or to those entering to assist with an emergency or carrying out urgent maintenance work. It is unlawful for CQC regulated care homes to employ staff who are not vaccinated against coronavirus unless they are medically exempt. Care homes will need to include the vaccination requirement in their recruitment policies and job adverts and properly understand any medical exemptions during the recruitment process.

#### **Government to introduce mandatory coronavirus vaccination for frontline health and social care workers in England**

The Government has now announced that vaccination against coronavirus will also become mandatory for health and social care workers in England who have face-to-face contact with patients unless they are medically exempt. This requirement will apply to doctors, nurses and dentists who are directly involved in patient care, and to ancillary staff such as porters, receptionists and cleaners who may have contact with patients in the course of their work. From 1 April 2022, it will be unlawful for CQC regulated providers in health and social care in England to employ unvaccinated staff, except for those individuals who are medically exempt.

To comply with the new regulations (on current time frames) unvaccinated staff will need to have their first dose of the COVID-19 vaccine by 21 January 2022 - since individuals are not considered fully vaccinated until 2 weeks after their second vaccine and the current advice is that vaccines should be given 8 weeks apart. To meet the deadline, all CQC regulated providers in health and social care in England, including the NHS, will need to begin a communication process with their staff now to ascertain their vaccination status and encourage those that have not been vaccinated to do so if they are not medically exempt.

If staff refuse to be vaccinated, and they are not medically exempt, CQC regulated provider will also need to consider redeployment and/or explore if there is a way the worker's role can be redesigned to remove patient contact or as a last resort termination of employment for those workers who refuse to be vaccinated and for whom redeployment/role redesign is not an option. This could involve a risk assessment of which parts of the organisation could be most affected, how they might then redeploy and any other terms' impact such as on hours or remuneration. Remote working without access to frontline patient care or to patients might also be a consideration for some workers. The Government's decision to extend the coronavirus vaccination requirement to health and social care could enable employers in other high-risk coronavirus work environments to justify requiring their staff to be vaccinated.

### **Medical exemptions**

Care home staff in England who are medically exempt from the coronavirus vaccine, can self-certify this until 24 December 2021. However, from Christmas day, a medical exemption will need to be certified by the individual's GP.

Whilst this may stop unfounded medical exemption claims from individuals who would prefer not to be vaccinated, it also adds to the work burden on GPs and is likely to be a lengthy process. Therefore, care homes and other employers that require vaccination, should now be consulting with their staff who have been self-certifying their medical exemptions, to inform them of the new process effective from 25 December 2021. The Government has also announced that a MATB1 stands as a medical exemption, for pregnant workers who prefer not to be vaccinated, until 16 weeks following the birth of their child. Whilst the coronavirus vaccine has been declared safe for pregnant women, and they have been encouraged to take up the vaccine, the Government is allowing pregnant women to choose to delay their vaccination until after birth. As pregnant women do not obtain a MATB1 until later in their pregnancy, presumably those unvaccinated who prefer not to take the vaccine during their pregnancy may also apply to their GP if they so wish for a medical exemption on pregnancy grounds to cover their position until the MATB1 is available. This is an interesting development. Care homes and other high-risk sectors choosing to impose compulsory vaccination, which might impact on a care worker retaining their job, should consider informing any pregnant staff of the MATB1 position. Were any medical exemption to be granted to a pregnant worker (pre receipt of their MATB1), any action by an employer to treat an employee with a pregnancy-related medical exemption less favourably than a worker with a non-pregnancy-related medical exemption will be unlawful and could amount to discrimination.

### **Can you require your workforce to be vaccinated?**

Apart from the care sector in England, and the changes due to come into force in health and social care in England, there is no legal requirement to be vaccinated against coronavirus. Therefore, any blanket policy by an employer requiring all staff to be vaccinated, before they can access their employer's workplace or client premises for work, will be considered unlawful and will carry discrimination and health and safety risks. Imposing mandatory vaccinations as a condition of continuing in employment could also result in negative publicity and cause issues with staff recruitment and retention. ACAS advises employers to encourage and support their staff to be vaccinated without making it a requirement. Examples include offering staff paid time off to attend vaccination appointments and paying the usual rate of pay where staff are off sick with vaccine-related side effects. However, even outside the health and care sector, there may be circumstances where vaccination will be a requirement. For example, an employee may need to be vaccinated to meet entry requirements of another country if travel is integral to their role. Employers will need to assess employees' rights in these circumstances to avoid a discrimination claim.

### **What are the employment legal risks of imposing compulsory vaccination?**

Breach of contract - Requiring your employees to be vaccinated without their express agreement could amount to a repudiatory breach of contract, entitling them to claim constructive dismissal.

Discrimination - Compulsory vaccination could directly discriminate against employees with a protected characteristic as described below. It also amounts to a provision, criterion or practice that could put those employees at a particular disadvantage, and so amount to indirect discrimination. While in some cases employers will be able to justify a requirement for mandatory vaccination, this could prove challenging where there are effective and less discriminatory methods such as regular testing, home working, social distancing and providing PPE, to achieve the required business outcome.

Data protection - There will be data protection implications where employers require staff to confirm their vaccination status. This will amount to special category personal data and is subject to stricter regulations. Employers should exercise greater caution when processing this data in accordance with the specific exceptions laid out in data protection legislation.

### **Can we lawfully dismiss an employee that refuses to be vaccinated?**

Employers will be legally permitted to dismiss care home staff who refuse to be vaccinated and cannot be redeployed, and the same may follow in health and social care. However, this will not apply to other sectors and employers must exercise caution when considering dismissal for this reason. Employees with at least two years' continuous service have unfair dismissal rights. Employers are therefore exposed to unfair dismissal claims if they have not followed a fair process or do not have a very good reason for dismissing because the employee has refused the vaccination. Refusal to comply with a management instruction to be vaccinated could amount to misconduct justifying dismissal. However, a tribunal is unlikely to consider a vaccination requirement reasonable unless it is legally required or essential to the employee's role. Where there is a client need for the employee to be vaccinated this could amount to 'some other substantial reason' justifying dismissal - provided the employer has acted reasonably. Even if employees have less than two years' service, they may still be able to pursue legal action against their employer if they are dismissed. For example, employees can claim automatic unfair dismissal on the grounds they were dismissed after expressing health and safety concerns about mandatory vaccinations. Such a claim requires no minimum length of service.

### **What should you be doing now?**

It is important for employers to consult with their staff and/or any recognised staff associations or trade unions now before introducing a company vaccination policy. Policies should encourage and provide paid time off where applicable for staff to have the vaccine and should also acknowledge that it is not appropriate for all staff. Where vaccination is a requirement of a job, any consequences of refusal should be explained. Employers in CQC regulated health and social care sectors in England should be communicating with their staff now to understand their vaccination status and to encourage those who have not been vaccinated to do so if they are not medically exempt, ahead of the new requirement to be vaccinated next spring. Employers in the health and care sectors in England should implement robust policies which clearly outline the vaccination requirement for staff and, in relation to care homes, also for any professionals visiting the care home and that entry will not be permitted without evidence of vaccination or a medical exemption. Unlike other sectors, where there is no legal requirement to be vaccinated, if a worker in the care sector (and soon to follow in health and social care sectors) in England is dismissed because they refuse to be vaccinated, this is unlikely to be considered discriminatory - provided it is done in a fair and non-discriminatory way. Finally, the policy should set out the employer's data protection obligations in relation to processing special category personal data about vaccination status. It is important to seek legal advice before introducing a company vaccination policy to mitigate the risks summarised above.

**Staff Christmas parties – a reminder for employers** - 2020 was a tumultuous year, and as the festive season approached many employers were left uncertain as to how to boost staff morale. A year on, employers may still be grappling with whether or not to hold a Christmas event. For those that are, or for those that are holding virtual parties or instead giving gifts, the key employment tax considerations should not be overlooked.

### Can a staff Christmas party be provided as a tax-free benefit?

A staff Christmas party qualifies as a tax-free benefit if it meets the 'annual events' exemption. In summary, for the event to qualify for this exemption, it must:

- Be open to all employees. A Christmas party for directors only, which other employees are not invited to, will not qualify for the exemption as it is not open to all employees. An annual party open to all employees at one location should still meet this part of the exemption even if an employer has multiple sites. Employers who hold separate events for different departments can still satisfy this part of the exemption, provided that all employees have the option of attending at least one of them.
- Be an annual event. Broadly, this means that the party must take place once a year on an ongoing basis.
- Cost £150 or less per attendee. The £150 limit includes VAT plus any additional costs met by the employer (such as travel and overnight accommodation). The exemption can be used to cover more than one event, provided that the £150 limit is not exceeded in a tax year.
- For example, if an employer holds an annual summer party at a cost of £45 per attendee, and a Christmas party costing £100 per attendee, the exemption might be used to cover both parties. In this example, the threshold would be exceeded if the Christmas party cost £120 per attendee and the summer party £45 per attendee. So it would be sensible, if all the conditions were satisfied, to use the exemption against the Christmas party (which has the greater cost) and treat the summer party as a taxable benefit (this would typically be dealt with via a PAYE Settlement Agreement – see below).
- Not be provided under a salary sacrifice arrangement.

### Post assignment surveys

We are committed to delivering an excellent client experience every time we work with you. Your feedback helps us to improve the quality of the service we deliver to you. Currently, following the completion of each product we deliver we attached a brief survey for the client lead to complete.

We would like to give you the opportunity to consider how frequently you receive these feedback requests; and whether the current format works. Options available are:

- After each review (current option).
- Monthly / quarterly / annual feedback request.
- Executive lead only, or executive lead and key team members.

## For more information contact

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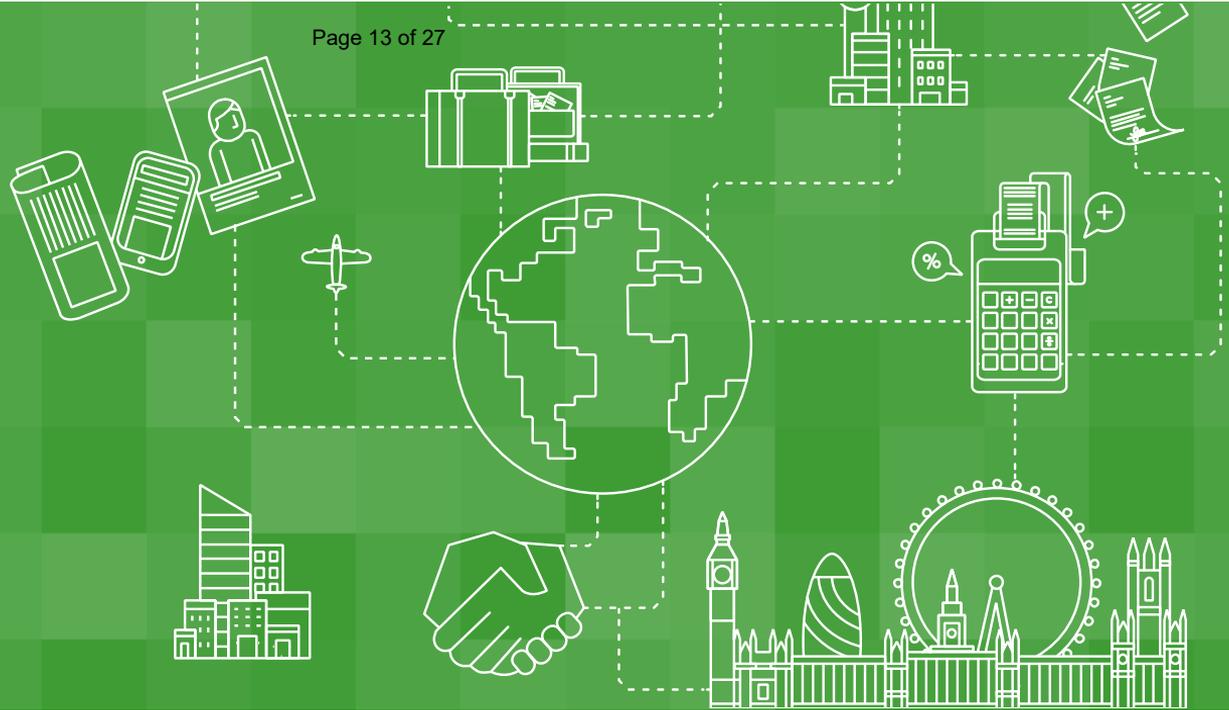
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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

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# RISK MANAGEMENT DEEP DIVE

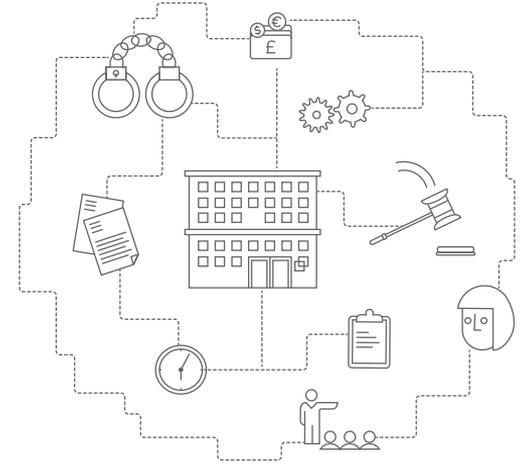
## Your key considerations



# Why perform risk management deep dives?

## Purpose of risk deep dives

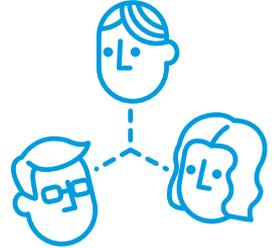
- Allow Audit Committees (or equivalent) to undertake a comprehensive review of a strategic risk.
- Allows for information in the strategic risk register to be elaborated upon, such as details on assurances around controls, as well as implications on the objectives, strategies and plans that are being pursued.
- Provide the opportunity to challenge the contents on the strategic risk register to ensure it is appropriate, in particular the effectiveness of the controls in place and the progress of actions to better improve the management of risk.
- Helps to determine if the current risk appetite remains appropriate.
- Assists in identifying further steps that may be required.
- Demonstrates that the Audit Committee take the management of risk seriously.



# Undertaking risk management deep dives

## Preparation for risk management deep dives

- Confirm deep dive language and communications – what does the Audit Committee mean by a deep dive? What is the objective? What outcomes are required?
- Create a deep dive scope - communicate this to those that will participate in the deep dive.
- Where does the deep dive take place? – as part of the Audit Committee meeting or outside?
- Agree strategic risks or topics to be discussed at Audit Committee (this can be undertaken in conjunction with the Board). Usually one per committee meeting and scheduled in advance.
- Audit Committee members to refresh themselves on the organisations current risk appetite prior to each risk deep dive. This will ensure that discussions and questions remain relevant and to the point.
- Agree who should attend the Audit committee and participate in the deep dive and why.
- Ensure the strategic risk information is up to-date.
- Audit Committee members to review the latest risk register in advance of the committee meeting to familiarise themselves with the particular risk subject to facilitate the deep dive.



# Risk management deep dive - coverage

## What you need to be able to explain

### Understand the strategic risk

- The strategic risk description, the current circumstances, drivers (or causes).
- The implications or effects of the strategic risk on the objectives of the business.
- Why the risk is scored as it is.

### Understand the effectiveness of the current controls and planned actions

- What current controls exist, how they are used to manage the risk and their effectiveness.
- What actions or planned activities are to be undertaken to help better manage the risk, progress made and outcomes.

### Understand the basis of assurance

- What assurances and evidence is available to support conclusions reached around controls effectiveness and progress / outcomes of actions.
- The cycle of management monitoring and review arrangements that are applied to the risk as part of reporting and oversight.
- Provide a forwards look, to the best of knowledge, as to how the risk and the controls etc might be affected by events on the horizon.



# Risk management deep dive – the area of risk

## Understand the strategic risk

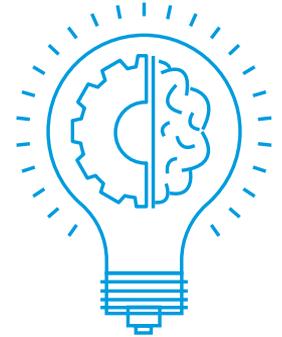
- Why was this strategic risk chosen for a deep dive?
- Why is the risk on the strategic risk register?
- **Context of the risk:**
  - alignment with corporate plan, projects, audit findings
  - recent problems/incidents
  - other underlying issues
  - consider the risk in context of sub risks, i.e. causes and consequences
  - emerging events or matters elsewhere (within / outside of the sector) that are a cause for concern.
- Have there been any changes to the above that have impacted the risk positively / negatively recently?
- Consider are assumptions realistic and can they be substantiated?
- How did the elements above influence the scoring of the risk? And does the risk score remain reasonable – inherently? residually and target?



# Risk management deep dive – current controls

## Understand the effectiveness of current controls

- What existing mitigating activities and / or controls are already in place? – if there are many focus on those that are key.
- Be clear about whether the mitigating activities/controls affect the likelihood of the risk occurring or if they help address the impact.
- Explain how you are assured that the mitigating activities take place and controls are in operation.
- Further explain how effective the mitigating activities and controls are by referencing to the risk assessment scores.
- Reference how the current risk assessment scores fit in with current risk appetite,
- Provide examples of realised benefits to demonstrate the effectiveness of the mitigating activities/controls.
- Be mindful if scores have changed since the last time Audit Committee reviewed the register, explain why.



# Risk management deep dive – planned actions

## Understand the effectiveness of planned actions

- How will these actions help improve the management of the risk?
- Reference how the current risk assessment scores fit in with current risk appetite and explain whether there is need for further activities or controls?
- And if not, why not?
  - Reference to realised benefits
  - Does effort/resources not outweigh further benefits, i.e. the risk assessment doesn't reduce significantly
  - Are there any limitations or constraints?
- If the risk assessment score needs to be reduced further, explain:
  - What you are going to do, and by when?
  - How will this affect the risk assessment scores both in terms of likelihood and impact?
  - What assurances will be available to confirm that the new mitigating activities / controls are effectively managing / minimising the occurrence of the risk?



# Risk management deep dive - assurances

## Understand the basis of assurance (existing controls / planned actions)

### What assurances exist?

- Who provides the assurance? What is the evidence base? How reliable is this?
- What is the frequency of this assurance?
- What are the outcomes of assurances provided? What does this tell us about the effectiveness of controls?
- What action is being taken to address weak levels of assurance? Or no where there are assurance gaps?



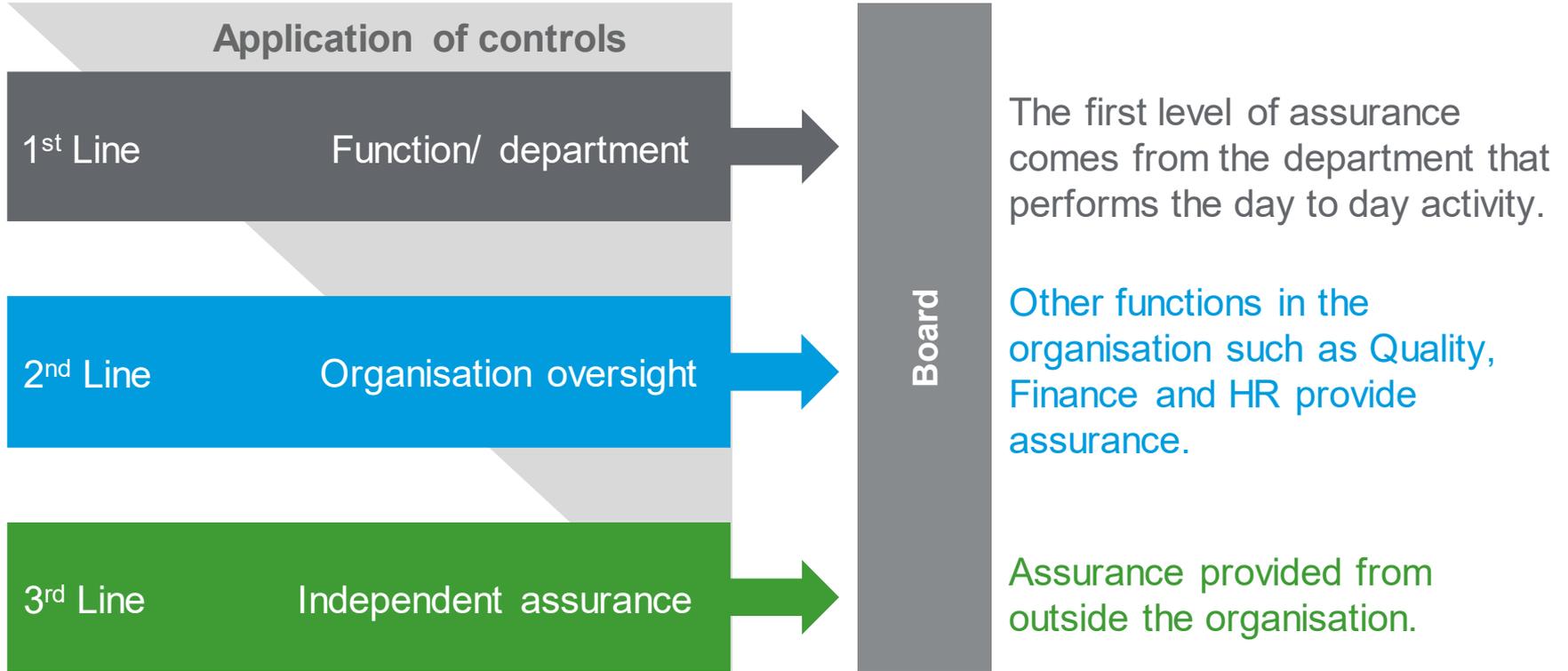
### What is the cycle of management monitoring and review of the risk, controls and actions?

- When does this occur?
- Who is involved? Is this management? Sub-committee?
- How does this take place? And what enquiries are made?
- What have been the outcomes to-date?

### How could this assurance provision change in the future?

- What future events within the business might impact on the risk, controls and actions? And what will be the impact when?
- What changes will be required to ensure the on-going management of the risk or assurance provision?
- How will this affect the risk assessment scores both in terms of likelihood and impact
- What will this mean to the business risk appetite? And decision making in the future?

# Who can give you assurance?



# Example board assurance template – three lines of assurance

## 9b. Board Assurance Framework Acad / Staff

Risk Ref	Risk Title	Cause & Effect	Inherent Risk Score	Risk Control	Control Assurance (Department)	Control Assurance (Management)	Control Assurance (Independent)	Overall Assurance Strength of Control	Residual Risk Score	Action Required	Progress Notes
STAFF 1	<p>Insufficient staff development and retention</p> <p><b>Risk Owner:</b> Mrs H Jones</p> <p><b>Risk Lead:</b> Mr C Smith</p> <p><b>Last Updated:</b> 04 Nov 2021</p> <p><b>Latest Review Date:</b> 02 Mar 2021</p> <p><b>Latest Review By:</b> Mr C Smith</p> <p><b>Last Review Comments:</b> Risk reviewed at Team Meeting and no updates made</p>	<p><b>Cause</b></p> <ul style="list-style-type: none"> <li>- Appraisal and performance management arrangements are not consistent</li> <li>- Unable to provide appropriate training and development opportunities</li> <li>- Insufficient resources to deliver training</li> <li>- Can't get staff out of day job to deliver training</li> </ul> <p><b>Effect</b></p> <ul style="list-style-type: none"> <li>- Low standards of teaching and education.</li> <li>- High staff turnover / Shortage of staff.</li> <li>- Reputational damage</li> <li>- Difficulties in recruiting</li> </ul>	I = 5 L = 5 25	<p>Action Plans in place for all staff to further develop career</p> <p><b>Control Owner:</b> Ms T Carter</p>	<p>All staff 1-1's carried out and reported into HR</p>	<p>HR report into Committee each meeting on progress</p>	<p>External Consultant used to support and review process</p>	<p>Adequate</p> <p>Assurance Date: 12 Jan 2021</p> <p>Assurance By: Mr N Brown</p>	I = 5 L = 2 10	<p>Bring in an external HR specialist to undertake an independent survey across all staff on their views around the support and training.</p> <p><b>Person Responsible:</b> Mr C Smith</p> <p><b>To be implemented by:</b> 31 Jul 2021</p>	<p><b>25 May 2021</b> <b>Ms T Carter</b> Shortlist down to 3 - decision to be made end June 21</p> <p><b>02 Mar 2021</b> <b>Mr C Smith</b> Contact has been made with a number of organisations and will discuss at next working group meeting March 2021</p>
				<p>All staff provided with personal training and development plan</p> <p><b>Control Owner:</b> Mrs H Jones</p>	<p>Training and development plans reviewed termly with management and HR</p>	<p>Update report taken to Management Team termly</p>	<p>External staff survey results provided by ABC Ltd</p>	<p>Adequate</p> <p>Assurance Date: 12 Jan 2021</p> <p>Assurance By: Mr N Brown</p>			
				<p>Annual Appraisal Processes in place for each member of staff that will include staff development plan that will be monitored throughout each year</p> <p><b>Control Owner:</b> Mrs H Jones</p>	<p>All appraisals held centrally in HR and reviewed annually</p>	<p>Update report taken to Management Team termly</p>	<p>Internal Audit review of appraisals annually</p>	<p>Limited</p> <p>Assurance Date: 12 Jan 2021</p> <p>Assurance By: Mr N Brown</p>		<p>Ensure all staff appraisals are carried out annually in line with policy</p> <p><b>Person Responsible:</b> Mr N Brown</p> <p><b>To be implemented by:</b> 02 Aug 2021</p>	<p><b>25 May 2021</b> <b>Ms T Carter</b> Action on target and will be completed on time</p> <p><b>12 Jan 2021</b> <b>Mr N Brown</b> 1st review carried out to determine who has not had an appraisal – action on track</p>
				<p>Experienced in-house training and development team in place to support all staff on their specific needs.</p> <p><b>Control Owner:</b> Mr C Smith</p>	<p>HR team includes mix of experienced and specialist staff to deliver the programme</p>	<p>Management team review the process ensuring we have the right skills mix in place</p>	<p>Internal Audit review carried out across the HR team including the effectiveness of the HR team to deliver the training</p>	<p>Substantial</p> <p>Assurance Date: 12 Jan 2021</p> <p>Assurance By: Mr N Brown</p>			

# Risk management deep dive – challenge

## Provide appropriate challenge (examples)

- How satisfied are you that the strategic risk is accurately described?
- What is the risk appetite for this risk? And why?
- How well is this risk understood within the wider business? How can this be evidenced?
- How content are you that the controls identified manage the risk? And what is this based on? How can this be evidenced?
- How satisfied are you that the planned actions will improve the management of the risk? And how content are you with the progress of actions? How can this be evidenced?
- What changes do you foresee that could impact on this risk and how?
- What further assurances could be obtained / would you like to obtain?
- Beyond what is already identified what further could be done to better manage or control the risk?

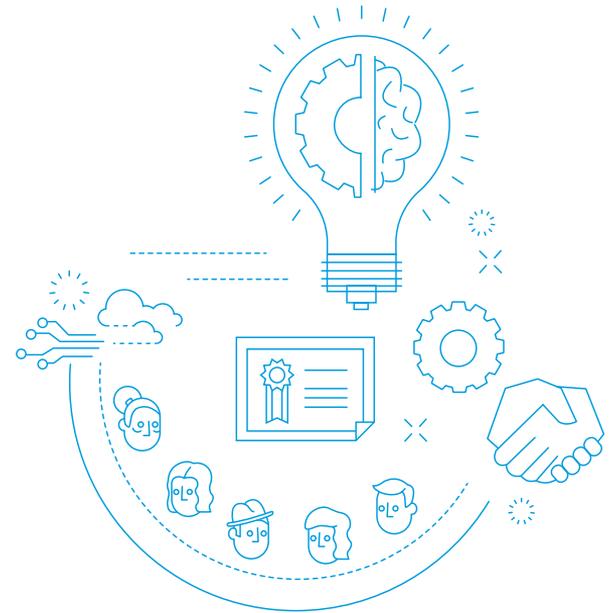


**Document outcomes, assign actions, follow up.**

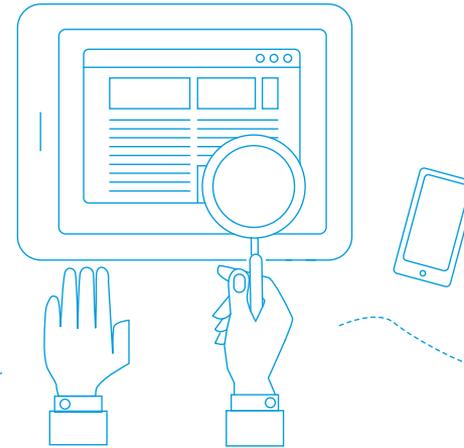
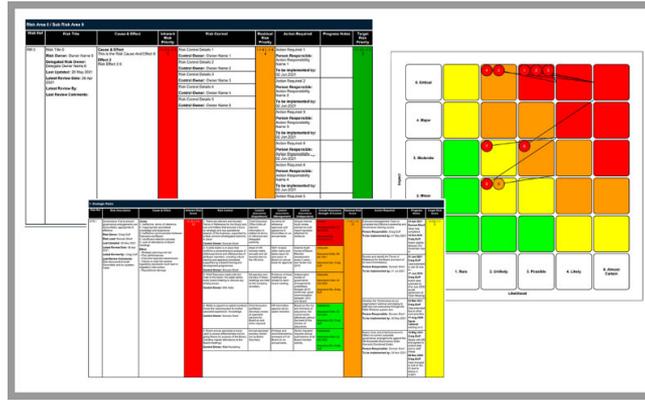
# Risk management deep dive - summing up

## Key steps

- 1) Be clear on the purpose and approach of the deep dive.
- 2) Make suitable preparations for a deep dive.
- 3) Focus the deep dive on a strategic risk or matter.
- 4) Understand (explore) the effectiveness of current controls that manage the risk.
- 5) Understand (explore) the effectiveness of planned actions.
- 6) Understand (explore) the basis of assurance
- 7) Provide appropriate challenge.
- 8) Document outcomes – actions to be taken, communicate and follow up.



# Visibility and oversight



## STR 1 - Governance:

Fail to ensure governance arrangements are accountable, appropriate & effective.

Cause and Effect	Existing Controls	Action Required	Notes/Risk Events	Strength of Controls	History
<b>Control Status:</b> Existing					
Risk Control	Assurance Given	Assurance Date	Strength of Control	Assurance Line	
1. There are relevant and focused Terms of Reference for the Board and sub committees that ensures a focus on strategic and key operational aspects of the business, supported by a clear scheme of delegated authority in place	Yes	19/01/2021	Limited	Management	<a href="#">View Details</a>
2. A skills matrix is in place that confirms a comprehensive analysis of skills/experience and effectiveness of all Board members, including robust training and appraisal processes supported by a Board training and development programmes	Yes	06/04/2021	Adequate	Overall Assurance	<a href="#">View Details</a>
3. Chief Executive meets with the chair of the board, the week before every board meeting to discuss any arising issues.	Yes	20/10/2020	Adequate	Overall Assurance	<a href="#">View Details</a>
4. Ability to appoint co-opted members if ever the need required for further specialist experience / knowledge.	Yes	20/10/2020	Substantial	Overall Assurance	<a href="#">View Details</a>
5. Board annual appraisal process used to assess effectiveness and on going fitness for purpose of the Board, including regular attendance to the Board meetings.	Yes	20/10/2020	Substantial	Overall Assurance	<a href="#">View Details</a>

## Insight4GRC



A complete picture of your assurances in real-time

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