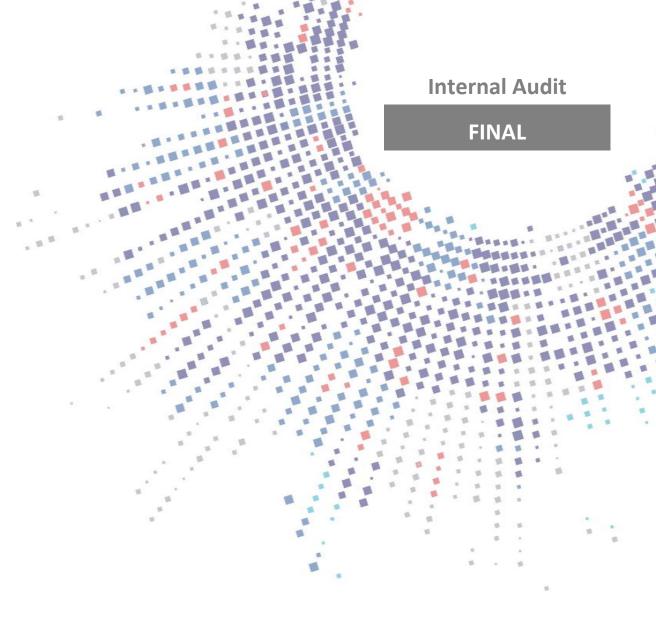


# **Dacorum Borough Council**

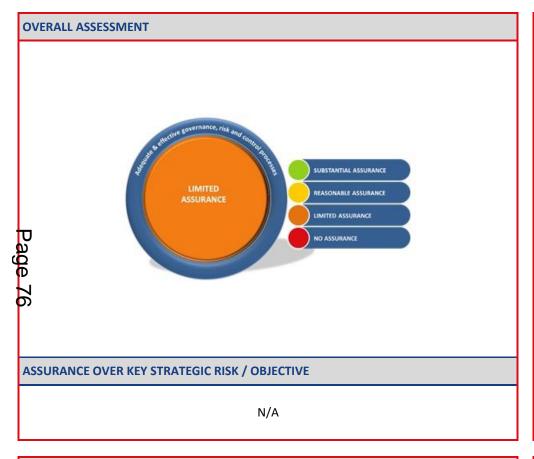
Assurance Review of Waste Management 75 2021/22



January 2022



# **Executive Summary**



## **KEY STRATEGIC FINDINGS**



There is a lack of compliance with regards to Waste Services (refuse collection) policies and process expectations as outlined by senior management relating to the adequacy of weights management, driver declarations and completion of documentation for vehicle checks, defect reporting and accident reports. Failure to comply undermines the assurance that the Council is meeting appropriate regulatory requirements.



There is no process within the Council to support Drivers to comply with medical license requirements (i.e. Eye tests) or to identify when tests are overdue. Proactive systems for monitoring Drivers are not in place and the onus is placed on Drivers to raise issues.



Operational management checks to identify and correct poor or incorrect working practices were not formalised or documented to ensure that all working areas were being checked and actions taken.



Digital tachographs are not in use to monitor driver hours. Assessment is underway to review costs for this facility but requires further support and development to realise in full.



Reliance is placed on manual paper based systems, electronic alternatives are required to improve the audit trail and support efficiencies achieved through paperless working,

# **GOOD PRACTICE IDENTIFIED**



The Council are offering Loading staff the opportunity to undertake training to become Drivers.

## SCOPE

The audit reviewed the management of Drivers and loaders, for the following areas:

 Driver's hours/ Log Books or Tachographs; Load management; Care of equipment; Parking; Reversing (banksman); Cleaning of equipment; Driver checks; Defect reporting; Understanding Fleet Compliance and processes; Spot checks conducted by Ops management, on: Log book records, Daily checks, Gate checks, Street checks, Seat belts, Vehicle condition/cleanliness of cab.

## **ACTION POINTS**

Urgent	Important	Routine	Operational
3	10	7	1



# **Assurance - Key Findings and Management Action Plan (MAP)**

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page 77	Directed	On-board scales are used by Drivers to monitor vehicle load weights. Operational Managers check and investigate the causes of weight tickets, where loads have exceeded set thresholds.  Review of overload records for the period April to October 2021, identified that in four instances, Drivers had not followed expected processes.  • in one instance the Driver did not record the on-board weight and did not complete a defect report  • Two instances where defect reports were not completed, to report the vehicle scales as defective.  • One overweight instance was due to the driver being unfamiliar with the operation of the hire vehicle.  A reminder of weights and thresholds was circulated to staff on 3rd September 2021. In discussions, staff recalled different weight limits and thresholds, for example 24 tonnes or 24.5 tonnes limits.	that staff are fully aware of and comply with vehicle weights limits, for all vehicles, prior to use and complete defect reports, as required.	1	Any vehicle that significantly exceeds the set weight is issued with a defect number and the vehicle is recalibrate.  There will be instances of drivers not following set down procedures but all drivers have been trained on their responsibilities.  Drivers have been issue with a written instruction to remind them of the relevant weight limits.	On Going	Operations Manager - Waste

## PRIORITY GRADINGS



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
<sup>7</sup> Page 78	Directed	As part of the license checks, reliance is placed on Drivers to complete appropriate medical checks. It was noted that there is no Council policy or monitoring in place which would require Drivers to complete the required medical checks when they are due. One Driver reported that their eye test was overdue due to Covid.	and put in place a monitoring system, which ensures that medical checks are taken by the Drivers which complies		This is part of an ongoing piece of work to centrally record such matters and ensure reminders are in place.  Some matters were overdue due to staff absence but this was addressed. In the meantime, a spreadsheet recording when last done it to be maintained to prevent recurrence.  If medical checks are not undertaken by drivers then their licence will be suspended or revoked at which stage the employer will be informed.  With regards eye test this was in relation to using display screen in cabs.  This will need to be discussed with HR.	31/01/2022	Operations Manager – Waste  Group



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
13	Directed	Driver Vehicle Checks and Defect Report sheets (DVCs) are completed at the start and end of routes. Review of the adequacy of completion of 11 DVCs, identified that:  • in one instance, a defect was identified however, a defect report number was not recorded on the DVC	the importance of performing the vehicle checks and completion of DVCs. demonstrating compliance with expected procedures.		Reminder gone to all supervisors and spot checks need to take place.  Transformation programme that is to take place aims to free up the supervisors time to carry out more checks to ensure drivers following procedure. Additionally, looking at whether an electronic recording of checks can be implemented.	30/09/22	Operations Manager – Waste
Page 79		<ul> <li>in four instances, end of run defects recorded were not signed off by the Workshop</li> <li>In six instances, the daily fluid checks were being ticked off for the end of the route. The DVC form states that checks are required at start of use.</li> </ul>			This has been raised with the Transport Manager and a further audit will be undertaken.	31/01/22	Transport Manager



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
314	Directed	The Council does not use digital tachographs (Digi cards) to monitor Driver hours.  In implementing the digital tachographs, this would cease the reliance of paper based recording systems, facilitate additional checks and monitoring on Driver hours to highlight Driver hour compliance issues.  At the time of the review, quotations had been obtained for hardware and training costs for implementing this system.	The use of digital tachographs be progressed and implemented within a defined timescale. Adequate monitoring systems should be developed and implemented to provide regular assurance on Driver hour's compliance.	2	This forms part of phase 1 of the depot transformation programme that commences January 2022. A decision around the feasibility and cost of implementing digital tachographs will then be possible by end of Q3 2022.	31/12/22	Group Manager - Environment
Page 80	Directed	The Drivers Handbook requires Council Drivers to formally declare their understanding of the Handbook and its requirements.  Managers are aware of an ongoing issue which has prevented Drivers completing the declaration, which relates to vehicle security and whether Drivers are able to comply with the stated expectations in operation.	address the Handbook content and	2	Alternative wording has been agreed which will be presented to drivers for their understanding and agreement before the Driver Handbook is reproduced.  Planned to assess new technology which would allow the vehicle to be locked with the engine running.	30/09/22 30/09/22	Transport Manager/Ope rations Manager



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
<sup>∞</sup> Page	Directed	The 'Operational Transport Policy' states "Managers should obtain written evidence and declarations from Drivers that they are not employed in driving duties elsewhere, other than the Council." Evidence could not be provided to support compliance against this requirement. Reliance is therefore, placed on Drivers requesting approval to undertake additional driving duties. It was noted that there is no system in place to check or monitor this activity.  The use of a Digi card (digital tachograph) would provide the means to undertake checks of out of hours driving.	that Drivers complete declarations in compliance with the Operational	2	This forms part of phase 1 of the depot transformation programme that commences January 2022. A decision around the feasibility and cost of implementing digital tachographs will then be possible by end of Q3 2022.  Drivers are required as part of their Terms and Conditions to request permission to undertake alternative work. If drivers ask this is refused due to restrictions on their driver's hours.	31/12/22	Group  Manager - Environment
81°	Directed	A central record of Driver compliance monitoring checks is not in place. During the audit, two versions of the Driver Certificate of Professional Competence (CPC) monitoring schedule (a Word and an Excel document) were provided and it was unclear as to which version was the prime record.	compliance checks (training, license, medical checks) be maintained and	2	This has been reviewed and merged into one Word document.	Audit again for suitability end of Q2 2022 when CPC training has been completed.	Operations Manager



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page	Directed	Review of the risk assessment for Waste Collection, it was stated that "Managers/Supervisors to complete regular crew monitoring checks and correct any poor working practices".  General workplace monitoring of operational practices takes place, however the expected checks performed, issues arising and any actions taken are not documented.  In discussions with Supervisors, it was stated that there was not enough time to complete checks or monitoring.	monitoring checks are completed and actions to prevent re-occurrence are recorded. An assessment of resources to complete expected checks should be undertaken.		Reminder gone to all supervisors and spot checks need to take place.  Transformation programme that is to take place aims to free up the supervisors time to carry out more checks to ensure drivers following procedure. Additionally, looking at whether an electronic recording of checks can be implemented.	30/09/22	Operations Manager - Waste
e 82	Directed	Key risks to Environmental Service delivery and priority actions are reported as part of the monthly Service Summary to Portfolio Holders.  It was noted that there is no risk register in place, to formally document and manage the risks being identified and reported through the Service Summary.	risk register is created and put in place. To record and manage risks raised in the monthly Service Summary report to the Portfolio Holder(s).		Work is taking place with the new In Phase system to record the risk register for the service. Additionally, the Neighbourhood Delivery Board now has the risk register for the service as a standing agenda item.	On Going	Assistant Director (Neighbourho od Delivery)



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page 83	Directed	Discussions were held with eight staff, comprising of two Supervisors, four Drivers and two Loaders, to ascertain their understanding of depot and fleet service, it was noted that:  • there is limited awareness of the Depot risk assessments and Waste Services Handbook;  • only one staff member highlighted the need to complete an accident report; and  • Lack of clarity over vehicle cleaning routines. A spot check carried out as	appropriate action of the lack of awareness or understanding of staff, as noted opposite.		The Waste Operations Manager is to hold a meeting with all the supervisors to ensure they are all au fait with the procedures and then ensuring in place across the service.  Operations Manager has advised that all staff have been advised on the two locations that the risk assessment can be located.  All drivers have been made aware of the requirement to complete an accident form.  Drivers are paid to clean their vehicles once per week however vehicles need	30/09/22  Operations Manager to issue instruction to	Operations Manager - Waste
		part of the audit visit identified dirty vehicles.  • Lack of clarity relating to duty supervisor license checks being completed on daily basis. Staff responses indicated that checks were not completed every day.			to cleaned as and when required.  Drivers licence and CPC cards are checked each morning before keys are issued to drivers.	all drivers.	



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page	Directed	A review of 11 accident forms, taken from the Accident Register, identified that:  • in one instance, the form did not record the registration of the vehicle involved in the accident;  • the forms did not include an estimated repair cost; and  • The forms had not been signed by a Manager.	It be ensured that all accident forms are completed in full and approved by the Operations Manager.	2	Discussed at the depot health & safety meeting, and supervisors to complete the accident forms with the relevant person to ensure done correctly and followed up.  Forms cannot include costs until accident has been assessed and quotes requested and received.  Unable to find any form that has not been signed by the Operations Manager.	Operations Manager to discuss with Supervisors. January 2022	Operations Manager - Waste
e 815 4	Directed	The Council are facing cost pressures for increases in insurance premiums due to vehicle accidents. Of the 11 accident forms reviewed, four resulted in insurance claims totalling £6,248.38.  The accident form does not prompt Managers to identify and record the root cause of the accident nor the actions required to prevent re-occurrence.	root cause of the vehicle accident and note the actions to prevent re-occurrence, on the accident forms.  Furthermore, a system to monitor compliance be developed and put in	2	Discussed at the depot health & safety meeting, and supervisors to complete the accident forms with the relevant person to ensure done correctly and followed up.  Work is also taking place with Corporate H&S and Insurance to understand trends to direct action.	Now	Operations Manager - Waste



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page 85	Delivery	Environmental services Key Performance Indicators (KPIs) are reported to the Strategic Planning and Environment Overview and Scrutiny Committee via the Performance Report.  Review of the 2021/22 Q1 Performance report (June 2021), identified that two waste collection KPIs (WR01a- Justified Missed Waste collections (excluding assisted collections) and WR03 - Number of justified missed assisted collections), was rated Red due to exceeding the target.  The KPI report did not include narrative to explain the missed targets or provide a remedial action plan to address this issue.	for those KPIs which are not performing along with a remedial action plan to bring the KPI back on track.		KPIs corporately are being reviewed as part of the new service planning process, and will be directly relevant to corporate and service priorities.  Narrative is provided to the Portfolio Holder on a monthly basis, and reports also go to the Overview and Scrutiny Committee on a quarterly basis. All show narrative it reasons differ from previous report.	31/03/22	Group Manager (Environment)
1	Directed	Policies and Procedures are communicated to staff via the annual refresher training programme. The 2020/21 Annual refresher training did not take place due to Covid. Training is planned to take place during 2021/22 winter downtime however dates have not as of yet been confirmed.	refresher training is delivered within the winter downtime.		Being undertaken from January to February 2022.	31/03/22	Operations Manager - Waste



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
6	Directed	A review of vehicle overload investigation reports, identified that a report had been completed in advance of discussions with the Driver. This was to ensure that it complied with report completion targets.  It was noted that the report had not been updated once details of the overload had been ascertained by the Manager.	investigation reports are completed in their entirety, namely containing the		The Operations Manager (Waste) is now required to sign them off as completed to ensure all areas are in place.	Now	Operations Manager - Waste
Page 86	Directed	A review of the training matrix, identified that two new members of staff, recruited in year, had not been listed.			Two new members concerned could be added until they had completed the training. Now updated. Additionally, work taking place with Corporate H&S to identify and implement a corporate H&S Database that will include the training matrix for services.	31/03/022	Operations Managers and Corporate H&S Manager
16	Directed	A review of five vehicle defect reports, identified that in three instances, vehicle details were incomplete - mileage not recorded, vehicle location not recorded, fleet number not recorded.	details/ information is recorded and		The Operations Manager (Waste) is now required to sign them off as completed to ensure all areas are in place.	Now	Operations Manager - Waste
17	Directed	The defect report template contained in the Waste Services Handbook, is not the one used by the Service area.		3	A review is to take place as part of the transformation programme (Phase 1).	31/03/23	Group Manager - Environment



Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
Page 87	Directed	Depot duties are supported by waste management risk assessments. A review of five risk assessments (Waste Collection, Depot Activities, Tipping Waste, DSEAR and Installation and removal of Recycling frames) identified that:  • in three instances, the risk assessments for Tipping Waste, DSEAR, Installation and removal of recycling frames, was dated 2018 and was overdue for review.  • Five hazards listed in the Waste Collection risk assessment and seven hazards listed in the Depot Activities risk assessment, did not state the nominated officer nor the completion date.  • A low risk hazard listed in the Depot Activities risk assessment, had not recorded an action date.  • A residual risk rating had not been assigned to hazards listed in the Tipping Waste risk assessment.	completeness, ensuring all relevant information has been recorded. For example, the responsible officer, completion dates assigned to actions and residual risk ratings applied where required.		A full audit of risk assessments at the depot has now been completed by Corporate H&S and a separate audit report and action plan produced. Actions are ongoing and will be monitored by the Corporate H&S Committee.	30/09/22	Group Manager - Environment





Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
20	Directed	There is a significant reliance on paper documentation which should be replaced with electronic processes. To improve the quality and completeness of the audit trail, and potential efficiencies of paperless working.	and substituted with electronic systems and processes.		Transformation programme that is to take place aims to free up the supervisors time to carry out more checks to ensure drivers following procedure. Additionally, looking at all back office systems.	From January 2022 onwards (Phase 1 of transformation programme)	Group Manager - Environment

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## PRIORITY GRADINGS



# **Operational - Effectiveness Matter (OEM) Action Plan**

Ref	Risk Area	Finding	Suggested Action	Management Comments
Page	Directed	The Council has not developed a local organisational strategy for waste within Environmental Services.  It was stated that national waste guidance was pending which will impact on the organisational delivery of services. Environmental Services is currently going through a transformational review. Service improvement process consideration could be given to developing a local waste strategy to underpin service developments and outcomes.	developments and outcomes be considered.	This is on the agenda for the Neighbourhood Board, as part of the waste reduction approach, capturing all elements including recycling. Work is already taking place to liaise with Herts Waste Partnership to see what there is in place at a County Level.



# **Findings**



# **Directed Risk:**

Failure to properly direct the service to ensure compliance with the requirements of the organisation.

Ref	Expected Key Risk Mitigation			Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework  There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.		Partially in place	1, 2, 3, 4, 5, 6, 7, 8, & 9	1
Page	Risk Mitigation	The documented process aligns with the mitigating arrangements set out in the corporate risk register.	Partially in place	10 & 18	-
90 ິ	Compliance	Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	Partially in place	11, 12, 13, 14, 15, 16, 17, & 20	-

# **Other Findings**



Dacorum Borough Council is part of the Hertfordshire Waste Partnership which was formed in 1992 and brings together ten borough and district councils in their capacity as waste collection authorities and Hertfordshire County Council as the waste disposal authority. A partnership strategy - The Hertfordshire Joint Municipal Waste Management Strategy, was noted to be in place.



Policies and procedures are in place in the form of:

- The Neighbourhood Delivery Environmental Services Operational Transport Policy and Related Procedures which was dated 2021/22.
- The Drivers Handbook, detailing the expected responsibilities for all staff taking control of vehicles on official Council business
- The Waste Services Handbook, dated April 2020, which includes operational guidance in the forms of Do's and Don'ts for waste collection processes.



# **Other Findings**

- Systems are in place for the management of Drivers hours within Domestic daily duty limits and working time directive through the completion of manual log books. These were seen to be in operation and signed by Supervisors. Discussions with Depot staff confirmed their awareness, and use of the log books, and reporting to Supervisors at the start of a shift.
- Staff receive training on parking and reversing on induction and refresher on an annual basis. While discussions with Depot staff confirmed their awareness of safe and considerate parking, reversing and use of reversing assistants four instances were noted where reversing was the cause of vehicle accidents.
- The License Bureaux Limited provide outsourced driving license verification checks, confirming that Drivers have the required categories of license. Outstanding Driver declarations were being followed up by the Transport manager to ensure that Drivers had completed the required information sharing declaration for licence checks to be performed.
- The Operational Transport Policy cross references to transport regulations and associated council policies.
- A review of a sample of four log books confirmed that documents were completed in full and signed by a supervisor. Hours recorded were within daily duty limits.





# **Delivery Risk:**

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation			Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring  There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.		Partially in place	19	-
FC	Financial Constraint	The process operates within the agreed financial budget for the year.	In place	-	-
Pa	Resilience	Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	Partially in place		-

# **Other Findings**

- The Environmental Services Performance report is provided to the Strategic Planning and Environment Overview and Scrutiny Committee (SPEOSC). A review of the 2021/22 Q1 Performance Report presented to the SPEOSC Committee on 22nd September 2021, confirmed that assurances included waste management services including Refuse and Recycling Domestic and Commercial Waste Collections.
- The 2021/22 Q1 Budget Monitoring Report to Cabinet on 21<sup>st</sup> September 2021, highlighted a forecasted £1M cost pressure against the budget for the General Fund. Of this £400K relates to Waste Services cost and income pressures. Evidence was provided by the Group Manager to support that the underlying causes of this budget variance were understood. The transformation programme is set up to address ongoing budget pressures.
- A key risk facing the Council is the loss of Drivers. Staffing levels and service delivery resilience has been highlighted through the Environmental Services Performance Report with actions to train loading staff to become LGV qualified and pay a retention premium to current staff.



# **Scope and Limitations of the Review**

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

## Disclaimer

2. The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

# **Effectiveness of arrangements**

3. The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

## **Assurance Assessment**

The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

# Acknowledgement

5. We would like to thank staff for their co-operation and assistance during the course of our work.

# **Release of Report**

The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	9 <sup>th</sup> July 2021	12 <sup>th</sup> August 2021
Draft Report:	22 <sup>nd</sup> November 201	25 <sup>th</sup> January 2022
Final Report:	26 <sup>th</sup> January 2022	

# **AUDIT PLANNING MEMORANDUM**

# **Appendix B**

Client:	Dacorum Borough Council				
Review:	Waste Management				
Type of Review:	Assurance	Audit Lead: Pr	Principal Auditor		
Outline scope (per Annual Plan):  Page 94	Risk: SR1  Rationale: There are concerns that standive review of the Waste Management Scope:  To review the management of Drivers  Driver's hours/ Log Books or Tandian Load management  Care of equipment  Parking  Reversing (banksman)  Cleaning of equipment  Driver checks  Defect reporting  Understanding Fleet Compliance  Spot checks conducted by Opsing Log book records  Daily checks  Gate checks  Street checks  Seat belts  Vehicle condition/cleanliness of cab.	and loaders, in the following area chographs.	Vaste) are not operating effectively and efficiently. The review will feed into the Council's	deep	
Detailed scope will consider:			Delivery  Performance monitoring: There are agreed KPIs for the process which align the business plan requirements and are independently monitored, corrective action taken in a timely manner.		
			Financial constraint: The process operates with the agreed financial budgethe the year.	et for	

demonstrated, with action taken in cases of identified non-compliance.

Compliance: Compliance with statutory, regulatory and policy requirements is Resilience: Good practice to respond to business interruption events and to

enhance the economic, effective and efficient delivery is adopted.





Requested additions to scope:	(if required then please pr	required then please provide brief detail)					
Exclusions from scope:							
Planned Start Date:	15/09/2021	Exit Meeting Date:	16/11/2021	Exit Meeting to be held with:	Richard Le Brun, Assistant Director (Neighbourhood Delivery) Craig Thorpe, Group Manager, Environmental Services		

# SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc.?	N
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	N
Have there been any significant changes to the process?	N
Are there any particular matters/periods of time you would like the review to consider?	N