

East Lothian Integration Joint Board



REPORT TO: East Lothian IJB – Audit and Risk Committee

MEETING DATE: 14 September 2021

BY: Chief Internal Auditor

SUBJECT: Internal Audit Report – East Lothian H&SCP Workforce Development

1 PURPOSE

- 1.1 To inform the Audit and Risk Committee of the recently issued audit report on East Lothian H&SCP Workforce Development.

2 RECOMMENDATION

- 2.1 That the Audit and Risk Committee note the contents of the audit report.

3 BACKGROUND

- 3.1 An assurance review of East Lothian H&SCP Workforce Development has been undertaken as part of the Audit Plan for 2020/21. This report was completed by the NHS Lothian Internal Audit team and was reported to the NHS Lothian Audit & Risk Committee in June 2021.
- 3.2 The main objective of the audit was to review the adequacy and effectiveness of the arrangements in place for East Lothian H&SCP Workforce Development.
- 3.3 The main findings from our audit work are outlined in the attached report.

4 ENGAGEMENT

- 4.1 The findings from the review have been discussed with Management, but do not require wider engagement.

5 POLICY IMPLICATIONS

- 5.1 None

6 INTEGRATED IMPACT ASSESSMENT

- 6.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

7 DIRECTIONS

- 7.1 The subject of this report does not require any amendment to or creation of Directions.

8 RESOURCE IMPLICATIONS

- 8.1 Financial - None
8.2 Personnel - None
8.3 Other - None

9 BACKGROUND PAPERS

- 9.1 None

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DATE	3 September 2021

Internal Audit



East Lothian H&SCP – Workforce Development

June 2021

Internal Audit Assurance assessment:

Objective One	Objective Two	Objective Three
Moderate Assurance	Significant Assurance	Significant Assurance

Timetable

Date closing meeting held: No meeting held, client responded directly to draft report

Date draft report issued: 28 May 2021

Date management comments received: 10 June 2021

Date Final report issued: 11 June 2021

Date presented to Audit and Risk Committee: 21 June 2021

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1. Introduction

- 1.1 The East Lothian Integration Joint Board (ELIJB), established in April 2016, under the Public Bodies Joint Working Act 2014 (the Act) is responsible for commissioning, directing, and governing the activities of the East Lothian Health and Social Care Partnership (the Partnership). The Partnership comprises NHS Lothian (NHSL), and East Lothian Council (the Council) who work together to deliver health and social care services for adults across East Lothian. The IJB is responsible for the strategic planning of the functions delegated to it and for ensuring the delivery of those functions through the directions issued by it under the Act. The role of the Partnership is the operational delivery of the Directions set by the IJB. The focus of the audit will be the operational delivery of workforce planning by the Partnership.
- 1.2 Workforce planning is concerned with ensuring that an organisation has the right people, with the right skills, in the right place, at the right time to support the delivery of objectives. This is particularly important for the effective provision of services within the partnership across East Lothian.
- 1.3 The provision of adequate resources is recognised within the ELIJB strategic risk register as a medium level risk with there being a potential lack of ability to recruit and deliver required services. In order to mitigate this a Joint Workforce Plan was approved at IJB on 23 May 2019. It aims to ensure that ELIJB strategically plans to have sufficient staff (health and social care), with the appropriate skills, to meet the current and future needs of the East Lothian population.
- 1.4 NHS Lothian and East Lothian Council remain the employers of staff in the partnership and both have detailed workforce plans. As a result the ELIJB workforce plan does not duplicate the detail of these plans, but builds on these to address common issues across the partnership. This workforce plan is informed by and informs workforce planning undertaken by partnership managers as they develop and review their service strategic plans.

Scope

- 1.5 The review assessed the East Lothian Health and Social Care Partnership's approach to workforce development, in particular ensuring that operationally people resources are in place to deliver redesigned services commissioned by the ELIJB which fit with strategic priorities for health and social care integration set out in the Strategic Plan to meet the needs of service users
- 1.6 Our fieldwork included reviewing the workforce plans for the HSCP, NHS Lothian and East Lothian Council. Detailed testing was carried out to assess the completeness of the plans and how the workforce development priorities are being considered across the partnership, and within the respective action plans. Interviews were held with representatives from the H&SCP, East Lothian Council and NHS Lothian.

Acknowledgements

- 1.7 We would like to thank all staff consulted during this review for their assistance and cooperation.

2. Executive Summary

Summary of Findings

2.1 The table below summarises our assessment of the adequacy and effectiveness of the controls in place to meet each of the objectives agreed for this audit. Definitions of the ratings applied to each action are set out in Appendix 3.

No.	Control Objectives	Assurance Level	Number of Findings			
			Critical	High	Medium	Low
1	The workforce planning framework is in place and provides a basis for the production of workforce plans that facilitate the achievement of the ELIJB's current strategic objectives	Moderate Assurance	-	-	1	-
2	Workforce plans are in place within the partnership which identifies existing workforce requirements and includes prioritised actions to address gaps in skills and numbers, to ensure the ELIJB's objectives are achieved	Significant Assurance	-	-	-	1
3	There is appropriate governance arrangements in place to monitor and report progress against workforce plans	Significant Assurance	-	-	-	1
Total			-	-	1	2

Conclusion

- 2.2 Within its 2019-2022 Workforce Development Plan, the ELIJB Health & Social Care Partnership has documented a workforce development framework in line with Scottish Government Guidance. The workforce development plan recognises the need to change how the IJB works across social care, community and acute providers. In collaboration with all partners and stakeholders the Health and Social Care Partnership has aimed through the plan to ensure that the future workforce will be knowledgeable, skilled and able to respond to the changes outlined in the East Lothian Strategic Plan
- 2.3 An Annual Workforce Planning Reporting Process has been developed by the Scottish Government to meet its annual reporting requirements. A reporting template has been developed and forwarded to NHS Lothian and Integration Authorities for completion by the end of April 2021, to support their submission. Exercises have been carried out to consider the events of the last year and their impact on future workforce requirements. Consequently, the ELIJB H&SCP should develop its workforce development plan to include its refreshed planning priorities and the impact on workforce plans going forward. As well as the likely resourcing requirements to ensure that the planning process is adequately supported.

Main findings

- 2.4 The ELIJB H&SCP Workforce Development Plan 2019-2022 clearly states the strategic objectives present in the ELIJB Strategic Plan 2019-2022. A number of these objectives had been taken forward into the production of the year one H&SCP Workforce Development Plan Action Plan.
- 2.5 Elsewhere, the NHS Lothian Workforce Plan 2019-2022 and East Lothian Council Workforce Plan 2018-2022 have both been aligned to the H&SCP Workforce Plan, with their respective workforce action plans including the actions necessary to ensure partnership involvement across the H&SCP workforce planning agenda.
- 2.6 NHS Lothian reviewed their actions in Autumn last year in light of Covid-19 and the timescales have been extended. In order to monitor progress and support leads all the actions have been factored into the agenda and plans for the NHS Lothian Workforce Planning and Development Board with HSCP actions due for an update in August 2021.
- 2.7 Similarly East Lothian Council are also in the process of reviewing their own workforce plan, with a Council Management Team meeting scheduled in Spring 2021 to agree updates to this. As with the IJB H&SCP, NHS Lothian and East Lothian Council are also required by the Scottish Government to submit interim 12 month workforce plans covering April 2021 to March 2022.
- 2.8 In May 2019 the 4 HSCPs working with NHS Lothian came together to share their workforce planning process and plans and during the event agreed 4 areas for future collaboration that each of the Chief Officers would progress. Covid-19 has given a

unique opportunity to rapidly implement new ways of working and they were keen to capture learning from this within the previously agreed areas of:

- GMS Implementation - encouraging collaboration rather than competition for staff.
- Digital Enablement - access to multiple systems across health & care/agile working.
- Recruitment & Retention (with a focus on promoting and supporting careers in care) factoring in the use of the third and independent sector as well as all unpaid carers.
- Learning & Development - building on ANPs, MAs and all other workforce enablers.

2.9 The ELIJB H&SCP Senior Management Team has established a strategic Workforce Planning & Development Steering Group. The Group acts on behalf of the H&SCP Senior Management Team and in a high-level strategic oversight role. It is responsible for advising senior management and the workforce development teams on the planning, implementation, evaluation and review of the ELH&SCP Workforce Development Strategy and Plan. A further role of the Group is to assist senior management and the workforce development teams to identify and address current risk factors relating to workforce planning and development priorities.

2.1 We identified three issues / improvement opportunities during this review:

Medium Rating

- The current H&SCP workforce plan and workforce action plan does not reflect the workforce developments arising from the events of 2020, with a lack of dedicated staff in the role of workforce development.

Low Rating

- Detailed service and workforce plans have not been developed to support the H&SCP workforce planning framework, with additional workforce plans in place across the Partnership recording similar actions.
- Meetings of the H&SCP Workforce Planning and Development Steering Group have not taken place since February 2020, with the monitoring arrangements from the H&SCP Workforce Plan not followed.

Further details of these points are set out in the Management Action Plan.

3. Management Action Plan

<p>Control objective 1: The workforce planning framework is in place and provides a basis for the production of workforce plans that facilitate the achievement of the ELIJB's current strategic objectives</p>	
<p>Finding 1: The current H&SCP workforce plan and workforce action plan does not reflect the workforce developments arising from the events of 2020, with a lack of dedicated staff in the role of workforce development</p> <p>Associated risk of not achieving the control objective: The East Lothian HSCP Workforce Planning Framework does not reflect the ELIJB's current strategic objectives and is under resourced to effectively link with partnership and progress the plan</p>	<p>Medium</p>
<p><u>Background</u></p> <p>The East Lothian IJB recorded in its Strategic Plan 2019-2022 that the East Lothian Health and Social Partnership was in the process of developing its first Joint Workforce Plan. It was intended that the plan would enable the Partnership to better match its human resources to those service areas which have the most need, enabling the partnership to better forecast and profile the workforce and to make staffing more sustainable.</p> <p>In response to this the East Lothian Health & Social Care Partnership has published the East Lothian Integration Joint Board Workforce Development Plan 2019-2022. The Workforce Development Plan has recorded in it the IJB's Strategic Aims, Objectives and Values. To support the implementation of the ELIJB H&SCP Workforce Plan, the East Lothian Health & Social Care Partnership had developed a year one action plan, covering 2019-2020. The Workforce Plan Action Plan has also been aligned to the ELIJB's Strategic Priorities, assigning a number of high level actions, owners and timescales.</p> <p><u>Observation and Risk</u></p> <p>It is noted that the ELIJB H&SCP has been unable to recruit a permanent workforce development officer, despite two recruitment exercises. This role has been filled on an interim basis by the Interim General Manager Service Improvement and Strategic Planning, East Lothian H&SCP.</p> <p>However, this is unsustainable in the longer-term and there is a risk that the Partnership is insufficiently supported in the role of workforce development, on which it is likely to become increasingly dependent following the publication of the 2020-2021 interim workforce plan and production of the 2022-2025 ELIJB H&SCP Workforce Development plan.</p> <p>Covid-19 has presented the H&SCPs with an opportunity to implement new ways of working and an exercise was carried out in September 2020 to capture this learning from each of the partnerships within the areas listed below:</p>	

- GMS Implementation
- Digital Enablement
- Recruitment & Retention (with a focus on promoting and supporting careers in care)
- Learning & Development

Consequently, the ELIJB H&SCP Workforce Development Plan 2019-2022 no longer supports the anticipated new ways of working identified from the exercise carried out in September last year. Without the required resources in place, there is a risk that the H&SCP is unable to develop the necessary actions to take forward all of its workforce priorities.

Recommendation

Management should consider the dedicated resource that is required to support workforce planning to move it forward at the pace required, with efforts continuing to establish necessary personnel to achieve this.

Management Response

Agree with risks and recommendation

Management Action

Senior Workforce and Organisational Development Officer has now been appointed and will start work on 7 June 2021. The post is hosted by ELC with a remit for ELHSCP.

In addition and recognising the importance of this role a further post is being developed to provide a project officer to support this the Senior officer. This is in addition to Business support already in post.

Further consideration is being given for a post to focus on Social Work professional development who would form part of the ELHSCP WFOD team.

Responsibility:

Interim General Manager

Target date:

30 June 2021

Control objective 2: Workforce plans are in place within the partnership which identifies existing workforce requirements and includes prioritised actions to address gaps in skills and numbers, to ensure the ELIJB’s objectives are achieved

Finding 2: Detailed service and workforce plans have not been developed to support the H&SCP workforce planning framework, with additional workforce plans in place across the Partnership recording similar actions

Associated risk of not achieving the control objective: The H&SCP is unable to support the achievement of the ELIJB’s strategic objectives, or the workforce priorities recorded within the H&SCP Workforce Plan

Low

Background

The East Lothian Partnership has two parts. The IJB sets strategy, issues directions to partners for delivery and monitors performance against delivery, while the H&SCP focuses on delivery of NHS and Council services and supports the IJB.

In addition NHS Lothian and East Lothian Council remain the employers of staff in the partnership and both have detailed workforce plans. As a result the H&SCP plan is not designed to duplicate the detail of these plans, but builds on these to address common issues across the Partnership.

The H&SCP Workforce Plan 2019-2022 has identified a number of workforce challenges across several service areas, and where sustainability issues are likely to occur. These include:

- General Practice
- General Practice Nursing
- Social Work/Care
- Mental Health
- Allied Health Professionals, and
- Planning & Performance

Meanwhile, the NHS Lothian Workforce Plan 2019-22 has included three actions that relate to the H&SCP:

- Building collaborative build collaborative approaches around the development of new/advanced/redesigned roles.
- With a focus on promoting and supporting careers in care, factoring in the use of the third and independent sector as well as unpaid carers, and
- Access to multiple IT systems across health & care to support agile working.

Elsewhere, the East Lothian Council noted in its March 2020 update that the H&SCP Workforce Plan should be aligned with the Council’s workforce plan and supports the development of new models of integrated working.

Observation and Risk

The East Lothian Health & Social Care Partnership Workforce Planning and Organisational Development Steering Group noted at its meeting on 24 January 2020 that further detail was to be added to the H&SCP Workforce Plan for each individual service plan. And that the partnership was now moving forward with service action and team plans. The subsequent meeting on 28 February of the Group noted the agreement to discuss the workforce plan and related service plans at its next meeting.

However, at the time of this review, there has been no meaningful progress around the development of service plans. Audit have been provided with the AHP Workforce Plan Action Plan for 2019-20, however the H&SCP actions contained therein relate to the three H&SCP Workforce priorities recorded in the NHS Lothian Workforce Plan Action Plan.

Consequently there is a risk that without detailed workforce plans the East Lothian H&SCP is unable to support the achievement of the ELIJB's strategic objectives, or the workforce priorities recorded within the H&SCP Workforce Development Plan. Including the risk that Partnership is unable to report progress against workforce plans in line with its set objectives.

Also, where a number of plans are in place across the Partnership, each with their own strategic priorities, there is the additional risk that the core H&SCP strategic priorities are diluted across the partnership. Or there may be a disconnect between the various workforce plans, leading to uncertainty or confusion around who is responsible for taking particular actions forward. With this in mind, there is a risk of duplication across the workforce plans, resulting in inefficiencies in the delivery of the workforce plan priorities.

Recommendation

Management should continue the development of the individual service plans, ensuring that they are aligned with the H&SCP Workforce Development Plan and comply with national workforce planning guidance. After which, detailed workforce plans for all individual areas of the H&SCP should be created.

Elsewhere, the partnership should consider its workforce planning arrangements, identifying potential areas of duplication and opportunities to streamline the workforce plans, with agreed actions assigned across partnership.

Management Response

Agree with recommendation, but would like it to be noted that this recommendation is a result of two factors;

1. The requirement for all partners to respond to Covid -19 Pandemic and therefore unable to address the service plans for WFD.
2. The lack of personnel as detail in recommendation 1 meant even without the pandemic work would have been hampered.

Management Action

Re-instate individual service WFP.

Work collaboratively with ELC and NHS in the development of ELHSCP Workforce Plan 2022-2025.

Create Action Plan which is aligned to the WFP and allows the actions of the WFP to be measured.

Responsibility:

Senior Workforce and Organisational
Development Officer

Target date:

30 April 2022

Control objective 3: There is appropriate governance arrangements in place to monitor and report progress against workforce plans

Finding 3: Meetings of the H&SCP Workforce Planning and Development Steering Group have not taken place since February 2020, with the monitoring arrangements from the H&SCP Workforce Plan not followed

Low

Associated risk of not achieving the control objective: Partnership does not report progress against workforce plans in line with the set objectives

Background

The H&SCP Senior Management Team has established a strategic Workforce Planning & Development Steering Group (the Group). All parts of the service is required to participate in the work of the Group either directly through membership or indirectly through ensuring steering group decisions approved by management are implemented.

The Group provides significant opportunities to move forward with the workforce development agenda at a local level and within the services in a coordinated way. Ensuring that all parts of the service are influenced by learning and development strategic priorities.

The Group acts on behalf of the H&SCP Senior Management Team and in a high-level strategic oversight role. It is responsible for advising senior management and the workforce development teams on the planning, implementation, evaluation and review of the ELH&SCP Workforce Development Strategy and Plan.

A further role of the Group is to assist senior management and the workforce development teams to identify and address current risk factors relating to workforce planning and development priorities. This will help to inform the development, implementation and review of the annual Workforce Planning and Development Plan. The Group's agenda will reflect national and local strategic developments in health and social care services as well as Council/NHS Lothian corporate strategic initiatives and policies, in addition to supporting and advising senior management and the workforce development teams regarding the delivery of priority workforce development initiatives.

The Group reports to the ELH&SCP Senior Management Team and is chaired by the Director of the ELH&SCP. Membership of the Group includes:

- Director ELH&SCP (Chair)
- Heads of Service
- Group Service Manager – Planning & Performance
- Human Resource Business Partners ELC / NHSL
- Organisational Development colleagues ELC /NHSL
- Senior Workforce Development Officers ELC /NHSL
- Union Representatives
- Other co-opted specialists both internal and external

The Terms of Reference for the Group includes the proposal of establishing a working group made up of middle managers to map out what is happening now as well as develop proposed shared terminology.

The ELIJB H&SCP Workforce Development Plan has recorded that the Implementation of the plan will be monitored by the East Lothian Workforce Planning and Development Group, with progress reported annually to the East Lothian IJB to ensure it continues to align with the Strategic Plan.

Monitoring will be through progress reviews against the short, medium and long term action plan and assessment against delivery of service priorities and change programmes.

Observation and Risk

However, the events of 2020 and associated shift in H&SCP focus during the pandemic has meant that the Group has not had the opportunity to meet since February of last year, with a number of ELIJB Workforce Plan actions pending. Also, no decision has been made by the Group on the merits of establishing a working group to take forward the more operational aspects of workforce development within the H&SCP services.

Consequently, progress has not been formally reported by the Group to the East Lothian IJB.

Also, the monitoring framework, documented in the 2019-2022 ELIJB H&SCP Workforce Development Plan has not been established. It is intended that the first report will be the updated action plan that is due the end of April and will reflect the changes required in workforce due to the pandemic. Detailed monitoring criteria will be developed from this.

Without an effective means of monitoring and review, there is a risk that Partnership does not report progress against workforce plans in line with the set objectives, resulting in limited assurance being provided to the ELIJB that workforce planning is operating as intended.

Recommendation

The Workforce Planning & Development Steering Group should establish a frequency of meetings appropriate for the ongoing development of the H&SCP workforce development framework, which should be a standing item on the Group's agenda.

The Group should upon its recommencement discuss establishing a management working group to provide the link between the development of the overarching H&SCP Workforce Development plan and the various service plans that are essential to the strategic objectives of the Plan.

Once done, the Chair of the Group should prepare an update paper to be tabled at the next meeting of the IJB, providing clear information on the current status and a timeline of actions necessary for the IJB receive assurance on the implementation of the one year interim plan and 3-year workforce development plan thereafter.

Management Response

Agree with recommendation.

Interim WFP 2021- 2022 was submitted to Scottish Government at the end of April 2021

Steering Group now restarted and scheduled for the coming year.

Management Action

Continue the steering group as detailed in the recommendation.

Support the development and quality assurance of individual service action plans.

Responsibility:

Chief Officer – East Lothian IJB

Target date:

30 April 2022

4. Internal Audit Follow-up Process

- 4.1 Approximately two weeks following issue of the final Internal Audit report, a member of the Audit Team will issue an 'evidence requirements' document for those reports where management actions have been agreed.
- 4.2 This document forms part of the follow up process and records what information should be provided to close off the management action.
- 4.3 The follow-up process is aligned with the meetings of the Board's Audit & Risk Committee. Audit Sponsors will be contacted on a quarterly basis with a request to provide the necessary evidence for those management actions that are likely to fall due before the next meeting of the Audit and Risk Committee.

Appendix 1 – Staff Involved and Documents Reviewed

Staff Involved

- Service Manager Internal Audit East Lothian Council
- Head of Workforce Planning – NHS Lothian
- Regional Workforce Planning Manager – East Lothian Council
- Interim General Manager Service Improvement and Strategic Planning – East Lothian H&SCP
- Senior Development Officer – East Lothian Council

Documents Reviewed

- East Lothian Workforce Plan 2019-2022
- Terms of Reference – H&SCP Workforce Planning & Development Group
- NHS Lothian Workforce Planning & Development Programme Board – 10/11/20 minutes
- NHS Lothian Workforce Planning & Development Programme Board – 19/01/21 agenda
- East Lothian IJB 2019-2022 Strategic Plan
- 2021-22 NHS Lothian Workforce Plan Action Plan
- East Lothian IJB HSCP Workforce Plan Action Plan 2019-22 (year 1)
- East Lothian Council Workforce Plan 2018-2022
- Interim Workforce Planning Reporting Template and Guidance
- NHS Lothian Workforce Planning and Development Programme Board - Rolling Action Log January 2021
- NHS Lothian review of workforce plan 12 month actions SBAR – 02/12/20
- ELC Workforce Plan Update March 2020
- Lothian HSCPs - Workforce Planning Collaborative - Lessons Learnt from Covid-19
- NHS Lothian Workforce Plan 2019-22
- Integrated Health and Social Care Workforce Planning for Scotland Guidance
- East Lothian Health & Social Care Partnership Workforce Planning & Development Steering Group – 31/01/18, 24/01/20 and 28/02/20 minutes

- East Lothian Health & Social Care Partnership Workforce Planning & Development Steering Group – 28/02/20 agenda
- East Lothian Health & Social Care Partnership Workforce Planning & Development Steering Group action log
- SBAR Lothian HSCP Workforce Planning Collaborative May 2019
- Regional Workforce Planning Group - Refocus of Regional Workforce Planning Priorities
- NHSL WPDPB Action Plan Agenda update schedule March 2021

Appendix 2 - Definition of Ratings

Findings and management actions ratings

Finding Ratings	Definition
Critical	A fundamental failure or absence in the design or operating effectiveness of controls, which requires immediate attention
High	A key control failure has been identified which could be either due to a failure in the design or operating effectiveness. There are no compensating controls in place, and management should aim to implement controls within a calendar month of the review.
Medium	A control failure has been identified which could be either due to a failure in the design or operating effectiveness. Other controls in place partially mitigate the risk to the organisation, however management should look to implement controls to fully cover the risk identified.
Low	Minor non-compliance has been identified with the operating effectiveness of a control, however the design of the control is effective

Report ratings and overall assurance provided

Report Ratings	Definition	When Internal Audit will award this level
No assurance	The Board cannot take any assurance from the audit findings. There remains a significant amount of residual risk.	The controls are not adequately designed and / or operating effectively and immediate management action is required as there remains a significant amount of residual risk (for instance one Critical finding or a number of High findings)
Limited assurance	The Board can take some assurance from the systems of control in place to achieve the control objective, but there remains a significant amount of residual risk which requires action to be taken.	<p>This may be used when:</p> <ul style="list-style-type: none"> • There are known material weaknesses in key control areas. • It is known that there will have to be changes that are relevant to the control objective (e.g. due to a change in the law) and the impact has not been assessed and planned for. <p>The controls are deficient in some aspects and require management action (for instance one 'high' finding and a number of other lower rated findings)</p>
Moderate assurance	The Board can take reasonable assurance that controls upon which the organisation relies to achieve the control objective are in the main suitably designed and effectively applied. There remains a moderate amount of residual risk.	<p>In most respects the "purpose" is being achieved. There are some areas where further action is required, and the residual risk is greater than "insignificant".</p> <p>The controls are largely effective and in most respects achieve their purpose with a limited number of findings which require management action (for instance a mix of 'medium' findings and 'low' findings)</p>
Significant assurance	<p>The Board can take reasonable assurance that the system(s) of control achieves or will achieve the control objective.</p> <p>There may be an insignificant amount of residual risk or none at all.</p>	<p>There is little evidence of system failure and the system appears to be robust and sustainable.</p> <p>The controls adequately mitigate the risk, or weaknesses are only minor (for instance a low number of findings which are all rated as 'low' or no findings)</p>

