

Final Report

Department of Education

Internal Audit Report

on

Website Security (Sparklebox)

Date: 23rd March 2010

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1. EXECUTIVE SUMMARY

1.1 OVERALL ASSURANCE RATING

Amber	Satisfactory – <i>There is some risk that objectives may not be fully achieved. Some improvements are required to enhance the adequacy and / or effectiveness of risk management, control and governance.</i>
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1.2 KEY FINDINGS

It is Internal Audit's opinion that the actions by DE staff were, on balance, prompt and proportionate to the risks as they were presented. Staff acted quickly to gather relevant information. Effective communication with key stakeholders was generally maintained throughout the process. Normal protocols and procedures were effective in helping to manage the work required.

We would note that the Department was not aware of the issues presented until the 28th January 2010. C2k had been monitoring developments and considering the implications of the subject's actions since they were informed on the 17th December 2009.

There were some minor weaknesses which require improvements. For example;

1.3 Objective 1 - Procedures and Protocols used by DE and areas for improvement

To determine the internal procedures and protocols used by DE, when it was informed by BELB of the concerns about the Sparklebox website on Thursday 28 th January.	
To identify any areas for improvement and make recommendations, including in relation to procedures that should apply within DE (including in relation to informing the Minister and top management) and between DE and other education bodies in such cases.	

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Should there be a process for dealing with cases where the Minister may need to be notified of significant child protection issues?

Internal Audit recommendation (Priority 2)

Internal Audit recommends that senior management liaise with the Minister and her staff to establish;

- The volume of issues that are unnecessarily brought to her attention; and
- The volume of issues that she is not alerted to at the earliest opportunity.

In order to accomplish this it will be necessary to consider the most effective means of securing relevant information. For example, this may be achieved by monitoring and evaluation of novel or contentious AQW's.

Circumstances surrounding the inaccuracy in the Minister's statement.

Internal Audit recommendation (Priority 2)

The Department will need to consider how best to minimise the risk of similar errors occurring in future. Internal Audit would recommend the following are considered;

- The final statement should have been compared with the draft statement prepared on the evening of Friday 5th February to ensure that factual accuracy was maintained. This draft contained the correct date at paragraph 10 and direct comparison would have ensured the timeline recorded in the final statement was accurate; and
- A secondary method of ensuring factual accuracy would have been to have a member of staff from Curriculum Support Team review the statement before it was finalised. This is an organisational issue that would need considered further. The only practical way for this to occur would have been for staff to be available over the weekend or to have the opportunity on the Monday to review the final statement. This would be difficult to address and would need to take account of a number of factors such as conditions of service, costs, work life balance, and in circumstances where staff cannot or will not be available, consideration of a contingency plan that will allow for review of key documents in line with ministerial or assembly business requirements. Internal Audit cannot be directive in this area as there will be elements that

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are subject to the Northern Ireland Civil Service (NICS) pay and conditions of service.

2. INTRODUCTION

Internal Audit has undertaken a review of the procedures and protocols used by the Department of Education to respond to concerns raised by the parent of a child at a primary school in Belfast. The parent was concerned that the school was using the teachers' resource website "Sparklebox". The site was formerly owned and operated by a former teacher who was recently convicted of making and possessing indecent images of children. He was sentenced to 12 months imprisonment on the 8th January 2010. This was his second conviction. Internal Audit understand the parent was concerned that the school was potentially supporting and providing an income to someone who had been convicted of making and possessing indecent images of children.

The issue was raised with the school, on behalf of the parent, by a Member of the Legislative Assembly (MLA) during the afternoon of the 27th January 2010. The school contacted the Belfast Education and Library Board's (BELB) Curriculum Advisory and Support Services (CASS) the following morning at 7.55 a.m to inform them they had stopped using the website following receipt of a complaint from a parent. Following this initial contact CASS notified the BELB Child Protection Support Service for Schools (CPSSS); this included informing the Chief Education and Welfare Officer (CEWO).

The BELB contacted C2k to alert them to the schools actions and the parent's concerns. C2k provide and maintain the Information Communications Technology infrastructure and support services for all local schools and as such are at the forefront of ensuring Internet safety via the C2k network. The Department was first alerted to this issue on morning of the 28th January at 10.14 a.m. The BELB Chief Education and Welfare Officer contacted the Head of Branch (HoB) for the Department's Pupil Support Unit (PSU). As the issue was related to the use of a website the HoB for PSU contacted the Curriculum Support Team (CST) to inform them of the issue. The HoB of CST contacted the Chief Executive of C2k to clarify the position in respect of the website's availability via the C2k network. At that time the site was not blocked from the network. It was agreed that a meeting between DE (CST and PSU) and C2k would be arranged to discuss and review C2k procedures for internet filtering.

The following day (29th January) the Department received an Assembly Question Written (AQW) from the MLA. Normal protocols were followed in preparing a response to the AQW. A draft response was prepared and cleared by DE senior management and issued to the Department's Central Support and Co-ordination team on the 2nd February.

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On Monday the 1st February the C2k management board met and decided to block the Sparklebox website with immediate effect. Internal Audit is aware that C2k had been aware of the key facts from the 17th December 2009. C2k had kept the websites availability under constant review during the period prior to the decision to block the site.

The Minister for Education made a statement to the assembly on the 8th February on the subject. This included a commitment to investigate the manner in which the situation was handled and to make recommendations on what lessons could be learned to further enhance policies and procedures for protecting the safety of children. The procedures and protocols followed by C2k are subject to a separate review by an investigation team from the Western Education and Library Board. DE Internal Audit is considering the issues in respect of the Department's actions from the 28th January onwards. A Summary timeline is included below. This includes several key dates prior to the 28th January 2010.

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SPARKLEBOX WEBSITE - TIMELINE OF EVENTS	
<u>Date</u>	<u>Action</u>
Thursday 17 th Dec 2009	C2k become aware of key issues
Monday 21 st Dec 2009	C2k management board is made aware of issue – decides to investigate circumstances, keep website under review. C2k monitors developments on an ongoing basis
Friday 08 th Jan 2010	Sparklebox former owner (subject) convicted of offences against children
Wednesday 27 th Jan 2010	MLA raises issue with school, on behalf of concerned parent
Thursday 28 th Jan 2010	7.55am - School contacts BELB (CASS)
Thursday 28 th Jan 2010	BELB contacts C2k – advises school's actions & parent's concerns
Thursday 28 th Jan 2010	10.14am - BELB CEWO notifies DE (PSU Head of Branch)
Thursday 28 th Jan 2010	PSU Head of Branch discusses issues with Head of Branch for CST and agree way forward
Thursday 28 th Jan 2010	Head of Branch for CST contacts Chief Executive of C2k and by 12.33 p.m has also notified DE press office of the issue
Friday 29 th Jan 2010	DE receives AQW (priority) from MLA
Friday 29 th Jan 2010	MLA issues press release which is published by a national newspaper on the 30 th January
Friday 29 th Jan 2010	Curriculum Support Team prepares a response for the Minister and provides a background note as briefing so that she is aware of the Sparklebox issue
Monday 01 st Feb 2010	C2k Management Board meets and takes decision to block Sparklebox website immediately
Tuesday 02 nd Feb 2010	Draft response to AQW provided to CSCT
Friday 05 th Feb 2010	Draft statement provided to Minister on the evening of Friday 5 th February - was factually accurate and reflected that the parent had first highlighted their concerns on the 27 th January.
Monday 08 th Feb 2010	<p>DE Minister makes statement to Assembly on issues – advises will investigate handling of situation/ lessons learned</p> <p>Statement records, inaccurately that the first date of contact by the parent was the 28th January.</p> <p>MLA then highlights the inaccuracy in the statement.</p>

3. PURPOSE, SCOPE AND OBJECTIVES

3.1 The purpose of the review was to provide the Accounting Officer with an opinion on the adequacy and effectiveness of the system of risk management implemented to facilitate the achievement of business objectives.

3.2 The scope of the audit, in terms of objectives and associated risks to be reviewed were agreed in consultation with management to ensure that:

Adequate and effective procedures are in place to identify, evaluate and manage risk to ensure the Procedures and Protocols used by DE were effective.

3.3. Scope Limitations

The following areas were excluded from the scope of the assignment:

- A separate review has been completed by the Western Education and Library Board (WELB). This review was focused on seven key areas which are summarised below. These issues are therefore outside the scope of this review. However, where necessary, DE Internal Audit may comment on areas which will be reviewed by WELB where we determine it is of benefit.
- *Actions of C2K;*
- *C2K Protocols, Procedures and Processes in Respect of Child Protection;*
- *C2K Reporting Procedures to DE in Respect of Child Protection;*
- *Potentially Harmful Content or Interactive Elements of Sparklebox;*
- *Use by Schools in the North of Ireland;*
- *Informing Service Providers and Users; and*
- *Recommendations.*

4. AUDIT APPROACH

Internal Audit has raised recommendations where appropriate for additional actions for future reference in the remaining sections of this report intended to enhance the control and management of key risks.

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5. REPORT APPROACH

- 5.1 Section 6 in the body of the report sets out Internal Audit's evaluation on the objectives reviewed and records the detailed findings and recommendations. The terms of reference provided two separate control objectives however as they were closely linked Internal Audit has structured the report to provide a composite review of both under one objective.
- 5.2 In the report where there is a reference to the subject this refers to the person who was convicted of making and possessing indecent images of children.
- 5.3 DE Internal Audit has interviewed staff involved in managing this issue and has reviewed relevant documents produced by key staff, to ascertain timelines, and review the actions taken. From this we have formed our opinion on the actions taken and where necessary recorded lessons learnt. Appendix 2 of this report records a schedule of additional actions suggested by Internal Audit for implementation and agreed with senior management.

6. DETAILED FINDINGS and RECOMMENDATIONS FOR ADDITIONAL ACTIONS

OBJECTIVE 1 – Procedures and Protocols used by DE and areas for improvement

<u>Objective</u>	<u>Overall Residual Risk</u>
<p>To determine the internal procedures and protocols used by DE, when it was informed by BELB of the concerns about the Sparklebox website on Thursday 28th January.</p> <p>To identify any areas for improvement and make recommendations, including in relation to procedures that should apply within DE (including in relation to informing the Minister and top management) and between DE and other education bodies in such cases.</p>	<p>Satisfactory – <i>There is some risk that objectives may not be fully achieved. Some improvements are required to enhance the adequacy and / or effectiveness of risk management, control and governance.</i></p>

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- 6.1** We have made the following recommendations which, if implemented, should improve / enhance the overall system of control:
- 6.2 Responsibility for Child Protection issues within DE and liaison with Education sector bodies.**
- 6.3** The most visible point of liaison in respect of safeguarding issues is the Department's Pupil Support Unit (PSU). The team takes the lead on issues affecting pupils considered at risk of educational underachievement due to personal circumstances. Their area of responsibility includes all aspects of child protection policy and guidance within the education sector.
- 6.4** The unit has a strong network of contacts within the Education and Library Boards; this includes the Education Welfare Service (EWS) and the Child Protection Support Service for Schools (CPSSS). The team is also directly involved in the Designated Officers for Child Protection in Education Group (DOCPEG). The key stakeholders in this group are PSU and the Chief Education and Welfare Officers's from the Education and Library Boards. Within DE it is a key unit within the Department's Intra Departmental Safeguarding Children Group. This group consists of key stakeholders with a role or interest in safeguarding issues and provides a forum for keeping internal staff up to date on safeguarding developments.

Internal Audit opinion

- 6.5** It is Internal Audit's opinion that in terms of the existing networks and liaison with other education sector bodies these were effective in ensuring key staff within DE was notified of the issues presented at the earliest opportunity.

Protocols in DE for addressing child protection issues

- 6.6** Pupil Support Unit was the first team within DE to be notified of the concerns regarding the continued use of the Sparklebox website. (28th January 2010)
- 6.7** In order to address known risks management may consider producing detailed plans as a method of managing significant risk (for example Business Continuity Plans). This approach can be of benefit, it can assist in helping to determine the actions to take, their sequence and the people to contact. This approach may also impact on the timing of actions. While there are circumstances, where this approach is appropriate, this issue, as far as we can determine is one that has not been encountered previously and therefore is not one that could realistically be planned for. Internal Audit has considered the actions taken by DE staff on the day the concerns were raised. In particular we examined the timing of the notification and the timing and adequacy of the actions that followed

Internal Audit opinion

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6.8 It is Internal Audit's opinion the actions taken were timely and proportionate to the risk presented. Key members of staff, including senior managers, were quickly informed. We found no delays or deficiencies in the internal communication processes or in the way management worked to address the issues.

DE Safeguarding Group

6.9 One issue we considered was the potential for the DE Safeguarding Group to meet and discuss the issue. Internal Audit has considered the potential benefits of this, cumulative knowledge and experience, additional resources and wider reaching communication, and its limitations, time consuming, and lack of availability of staff at short notice. It is our view that this action may have been counter productive. This approach may have delayed the timing of the actions taken by DE staff.

6.10 We also considered if current organisational structures and responsibilities within DE could be viewed as a potential weakness. Internal Audit's view is that the network this group has produced was actually of significant benefit in allowing Pupil Support Unit to determine who needed to be contacted. This in turn allowed staff in the Curriculum Support Team to quickly start the process of assessing the issues by gathering relevant information and communicating with key education sector stakeholders.

6.11 Two key members of this group met to discuss the issue and agreed a course of action. This included the early consideration of a joint meeting with C2k.

Internal Audit opinion

6.12 It is Internal Audit's opinion that the issues were dealt with effectively and quickly and that key members of staff ensured that relevant facts were obtained and relevant stakeholders were contacted at the earliest opportunity. There was no need for the DE Safeguarding Group to consider these issues.

Risks of continued use of the Sparklebox website and timing of the communication of the issues to DE

6.13 There has been no evidence presented that shows there was or is any actual risk to young people via the continued use of the website. There is no evidence of any direct link between the subject, the website and his criminal activity. The issue of providing the opportunity for financial gain is an area that should have been subject to careful consideration, by the wider education stakeholder community, before the issue was raised by the concerned parent. The inclusion of relevant safeguarding professionals, to encourage debate, and draw on their cumulative knowledge and experience could only have been of benefit.

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- 6.14** Internal Audit is aware that the subject was under investigation from September 2009. C2k were aware of the criminal justice proceedings and the allegations against the subject from the 17th December 2009. The protocols and processes used by C2k, during the period 17th December 2009 until the issue was communicated to DE and the ELB's on the 28th January 2010, will be considered by an investigation team from the Western Education and Library Board (WELB). Their findings and any recommendations for improvement will be reported separately by the WELB.

Internal Audit opinion

- 6.15** The issues noted above should be addressed in the WELB report following their review.

Communication of the issue to the Education Minister

- 6.16** The first contact the Department had, on the issue, was at approximately 10.14 a.m on the 28th January. In accordance with internal protocols, after the information was relayed to her, the HoB for Curriculum Support Team alerted senior managers and the press office to the issue. The following morning, 29th January, DE received AQW 4381 (an assembly question which required a written response). This AQW was requested by the MLA who had contacted the school in question on the 27th January. The MLA also issued a press statement which was published the following day, 30th January, in at least one national newspaper. Curriculum Support Team prepared a response for the Minister, should she be questioned on the subject, and provided a background note as briefing for her. This briefing material was prepared and issued on the 29th January to ensure the Minister was aware of the Sparklebox issue and able to respond to enquiries from the press.
- 6.17** DE staff worked to ascertain the facts of the case and liaised with C2k to identify what actions they had taken. This is the approach Internal Audit would have expected staff to take to ensure that all facts of the case were gathered. Staff acted immediately and we found no delay in the actions they took. While it may be argued that the Minister could have been notified on the 28th January, Internal Audit believes that it was correct for staff to investigate the circumstances to establish factual accuracy and therefore consider the most effective means of dealing with the issue.

Internal Audit opinion

- 6.18** It is Internal Audit's opinion that staff in DE and in particular Curriculum Support Team acted appropriately, promptly and proportionately to the risk presented at that time. Normal protocols were followed and operated effectively.

Should there be a process for dealing with cases where the Minister may need to be notified of significant child protection issues?

- 6.19** The Minister could have been informed of the issue on the 28th of January. If C2k had communicated their knowledge of the issue to other education sector stakeholders sooner, this could have occurred earlier. However, there is no way of determining whether this would have been so.
- 6.20** Internal Audit does not believe that there should be specific criteria set to decide what should and should not be referred to the Minister. If this approach became normal practice there would be a significant risk of a multitude of issues (not only child protection), more appropriately dealt with by policy and frontline staff, being referred to the Minister.
- 6.21** It is right and proper that significant child protection issues should be communicated to the highest levels immediately. It is our view that the current protocols, if operated effectively, provide the most effective method of ensuring that significant child protection issues are communicated to the appropriate audience and at the right time.

Internal Audit opinion

- 6.22** It is Internal Audit's opinion that the decision on what should be communicated to the Minister should be left to the professional judgement of senior staff in the relevant business areas.
- 6.23** However, senior managers will want to assure the Minister that any novel or contentious issues that deserve to be brought to her attention are communicated at the appropriate time.

Internal Audit recommendation Priority 2

- 6.24** Internal Audit recommends that senior management liaise with the Minister and her staff to establish;
- The volume of issues that are unnecessarily brought to her attention; and
 - The volume of issues that she is not alerted to at the earliest opportunity.

In order to accomplish this it will be necessary to consider the most effective means of securing relevant information. For example, this may be achieved by monitoring and evaluation of novel or contentious AQW's.

Should staff have sought the Minister's views on the issues?

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- 6.25** While it may be of benefit to seek the Minister's view on such issues the processes which operate provide the Minister with the opportunity to review and comment on the issues of the day. The Minister was provided with timely information to alert her to this issue. This would have allowed her to consider whether or not she needed additional information. Internal Audit would note the Minister did ask for additional information in respect of this case.
- 6.26** In terms of the risk to young people, expert opinion appears to conclude that there was no evidence identified of any threat to the wellbeing of any young person. We do not believe it would be practical to seek the Minister's view on all child protection issues. This may introduce time delays and unnecessarily increase workloads for the Minister and staff. This would be counter productive and may even, in certain cases, increase the risk of harm to young people. Staff may feel there is a need to limit their actions until they have sought the Minister's views. There would also be a risk that staff would regularly err on the side of caution and refer issues to the Minister unnecessarily.

Internal Audit opinion

- 6.27** It is Internal Audit's opinion that the actions of staff were in accordance with normal protocols and that in the circumstances there was no need for immediate referral or contact with the Minister. The Minister was alerted to the issue the day after the department was first aware of the issues. We believe the response of staff was proportionate to the risks.

Circumstances surrounding the inaccuracy in the Minister's statement.

- 6.28** Following the Minister's statement, SDLP MLA Conall McDevitt, highlighted an inaccuracy in the statement. The inaccuracy related to the date the issue was first raised by the concerned parent. The draft statement provided for the Minister on the evening of Friday 5th February was factually accurate and reflected that the parent had first highlighted their concerns on the 27th January. However, by the time the Minister made her statement it recorded that the first date of contact was the 28th January. It emerges that over the weekend the statement was amended and this error was not identified before the Minister made her statement.

Internal Audit opinion

- 6.29** This is an error that should not have occurred. The fairly minor nature of the inaccuracy was such that would it not have impacted on any decision making process. However the presence of any inaccuracies may undermine public confidence in the information that is presented. There is an increased risk that key messages are obscured by clerical errors.

Internal Audit recommendation (Priority 2)

- 6.30** The Department will need to consider how best to minimise the risk of similar errors occurring in future. Internal Audit would recommend the following are considered.
- The final statement should have been compared with the draft statement prepared on the evening of Friday 5th February to ensure that factual accuracy was maintained. This draft contained the correct date at paragraph 10 and direct comparison would have ensured the timeline recorded in the final statement was accurate.
 - A secondary method of ensuring factual accuracy would have been to have a member of staff from Curriculum Support Team review the statement before it was finalised. This is an organisational issue that would need considered further. The only practical way for this to occur would have been for staff to be available over the weekend or to have the opportunity on the Monday to review the final statement. This would be difficult to address and would need to take account of a number of factors such as conditions of service, costs, work life balance, and in circumstances where staff cannot or will not be available, consideration of a contingency plan that will allow for review of key documents in line with ministerial or assembly business requirements. Internal Audit cannot be directive in this area as there will be elements that are subject to the Northern Ireland Civil Service (NICS) pay and conditions of service.

Are there any gaps in the current arrangements or processes?

- 6.31** Internal Audit is aware that one of the initial actions by DE staff was to contact C2k. This was followed up with a visit to discuss their internet security arrangements. During normal business C2k will be asked, on a daily basis, to both block unsuitable websites and unblock suitable websites. It is unusual for well established and significantly visited websites such as Sparklebox to be blocked.
- 6.32** Key stakeholders have identified that one improvement that is required is to ensure that where previously well established websites are blocked that consideration must be given to the need to inform parents and guardians of the reasons for doing so to minimise the risk of young people accessing unsuitable content.

- 6.33** It is recognised that the use of a website in school may create an impression that all the potential functionality is suitable for home use. In the case of Sparklebox the site did possess some functionality that was blocked by the C2k security filters. While there is no evidence that the Sparklebox website was used in any way in the subject's criminal acts it would be appropriate for the risks of accessing website content used in schools, outside of the C2k network, to be highlighted to parents and guardians. In the home it is their responsibility to ensure young people are protected, however this can be complemented by ensuring they are aware of the need to ensure any websites visited by their children are suitable.

Internal Audit opinion

- 6.34** The Department and education sector stakeholders must review the lessons learned from this and the WELB report to ensure potential improvements in policies and procedures are effectively addressed. In particular the issues identified above should be considered as elements of the wider policy on internet safety.

7. ACKNOWLEDGEMENT

Internal Audit would like to take this opportunity to thank both management and staff for their co-operation and assistance during the course of the review.

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DEPARTMENT OF EDUCATION

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APPENDIX 1 Assurance Levels for Risk Management

ASSURANCE CRITERIA

Opinion	Definition
Green	Substantial – There is a robust system of risk management, control and governance which should ensure that objectives are fully achieved.
Amber	Satisfactory – There is some risk that objectives may not be fully achieved. Some improvements are required to enhance the adequacy and / or effectiveness of risk management, control and governance.
Orange	Limited – There is considerable risk that the system will fail to meet its objectives. Prompt action is required to improve the adequacy and effectiveness of risk management, control and governance.
Red	Unacceptable – The system has failed or there is a real and substantial risk that the system will fail to meet its objectives. Urgent action is required to improve the adequacy and effectiveness of risk management, control and governance.

APPENDIX 2 - Additional Actions Schedule

NB: Management should indicate in their response in the table below whether they are willing to accept the recommendation.

Where management are accepting a recommendation, please provide a target date and a responsible officer. Where management are not accepting a recommendation, please provide a **brief** narrative for this decision.

Report Ref.	Area Identified for Improvement	Priority	Management Response	Target Date	Responsible Officer
6.24	<p>Internal Audit recommends that senior management liaise with the Minister and her staff to establish;</p> <ul style="list-style-type: none">➤ The volume of issues that are unnecessarily brought to her attention; and➤ The volume of issues that she is not alerted to at the earliest opportunity. <p>In order to accomplish this it will be necessary to consider the most effective means of securing relevant information. For example, this may be achieved by monitoring and evaluation of novel or contentious AQW's.</p>	2	Accepted	-	Senior Management

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Report Ref.	Area Identified for Improvement	Priority	Management Response	Target Date	Responsible Officer
6.30	<p>The Department will need to consider how best to minimise the risk of similar errors occurring in future. Internal Audit would recommend the following are considered.</p> <p>The final statement should have been compared with the draft statement prepared on the evening of Friday 5th February to ensure that factual accuracy was maintained. This draft contained the correct date at paragraph 10 and direct comparison would have ensured the timeline recorded in the final statement was accurate.</p> <p>A secondary method of ensuring factual accuracy would have been to have a member of staff from Curriculum Support Team review the statement before it was finalised. This is an organisational issue that would need considered further. The only practical way for this to occur would have been for staff to be available over the weekend or to have the opportunity on the Monday to review the final statement. This would be difficult to address and would need to take account of a number of factors such as conditions of service, costs, work life balance, and in circumstances where staff cannot or will not be available, consideration of a contingency plan that will allow for review of key documents in line with ministerial or assembly business requirements. Internal Audit cannot be directive in this area as there will be elements that are subject to the Northern Ireland Civil Service (NICS) pay and conditions of service.</p>	2	Accepted	-	Senior Management

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Report Ref.	Area Identified for Improvement	Priority	Management Response	Target Date	Responsible Officer

Key to priorities:

1. Significant weaknesses and should therefore be addressed immediately.
2. Weaknesses which are not fundamental but should be addressed as soon as possible.
3. Improvements that represent best practice