



Accountants &
business advisers

Nottingham City Homes

Health and Safety – Asbestos management

March 2013

Final Report

Assurance Level:

Substantially meets expectations

Audit Sponsor - Ian Rabett

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Audit Team - Nicola Higginbottom, Hamid Ghafoor, Christopher Rhodes and Bethan Hughes

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1 Introduction

- 1.1 Our work was performed as part of our internal audit plan for 2012/13, which was agreed with Management and the Audit Committee.
- 1.2 The purpose of our review was to assess the adequacy and effectiveness of the internal controls over Asbestos management at Nottingham City Homes.
- 1.3 In particular, our review considered the following potential risks:
- The Organisation may not be in compliance with the legislative requirements regarding Asbestos;
 - The Organisation may not monitor and report on Asbestos; and
 - Health and Safety procedures for asbestos were not followed in relation to the refurbishment of the Harvey Road depot and potential identification of asbestos (both pre and post potential identification).
- 1.4 The work was carried out primarily by holding discussions with relevant staff, reviewing any available documentation and testing controls in place to determine their effectiveness.
- 1.5 This report has been prepared as part of the internal audit of Nottingham City Homes under the terms of the contract for internal audit services. It has been prepared for Nottingham City Homes and we neither accept nor assume any responsibility or duty of care to any third party in relation to it. The conclusions and recommendations are based on the results of audit work carried out and are reported in good faith. However, our methodology relies upon explanations by managers and sample testing and management should satisfy itself of the validity of any recommendations before acting upon them.

2 Executive Summary

- 2.1 We have carried out the audit in accordance with the programme agreed with management and the Audit Committee. Based on the audit work carried out we have concluded that the level of control over Asbestos management is: **Substantially meets expectations.**
- 2.2 The Organisation has recently revised its Asbestos Management Policies. Review identified that the draft policies cover the core requirements of health and safety guidance in relation to the management of asbestos and should therefore enable the Organisation to manage asbestos risk if appropriately applied. At the time of review these policies were in draft form and due for approval by April 2013.
- 2.3 The Organisation is effectively implementing its asbestos management framework, having undertaken an asbestos risk assessment and through surveying of the housing stock. The Organisation intends to perform asbestos assessments on 100% of its housing stock, exceeding the requirements of the Health and Safety Executive (HSE) asbestos guidance and at the time of review, has undertaken asbestos surveys on approximately 90% of stock.
- 2.4 On completion of the current round of stock condition surveys the Organisation may however be left with a number of residual properties which have not been surveyed due to difficulties in gaining access. On completion of this survey round, the Organisation should ensure that a formalised strategy for gaining access to outstanding properties is produced to facilitate the completion of the full stock survey process. Through discussion it was confirmed that the Asset Management Team intend to devise such a strategy although detailed plans are yet to be formalised.
- 2.5 There are mechanisms in place at the Organisation to ensure that Management and Operatives are aware of legislative and other relevant changes in relation to asbestos management, including through Bullet-In updates, briefing notes and the Operative Health, Safety and Environment Handbook.
- 2.6 A training programme is also in place, with Operatives required to complete asbestos training on a 12 month basis. The completion of compulsory training, whilst recorded, is not formally monitored. During the review, sample testing identified several instances where training could not be evidenced as completed within the required time frames. At the time of review, this matter is being investigated by the Learning and Development Administrator.
- 2.7 Tenants are made aware of asbestos within their property through the issue of asbestos surveys for their property. Where asbestos surveys have not been completed, general asbestos information and guidance is provided to tenants. Over 85% of the housing stock have were issued with asbestos survey reports for their property via a mailshot in December 2012.

2.8 Harvey Road Asbestos Incident

From review of relevant policies and the Harvey Road Incident Investigation Report, it is clear that the asbestos management procedures were not followed in two significant respects;

- Before works commence there is a requirement for the contractor to review the asbestos log book and to sign the asbestos log book viewing record to evidence that this was carried out. The purpose of the log book viewing record is to provide evidence that the contractor was aware of any asbestos risks thereby protecting the safety of the contractor's staff and protecting NCH from claims from the contractor that they were mis-informed. During the investigation process it was noted that the relevant contractor verbally stated he had reviewed the asbestos log book prior to commencing work, however this was not evidenced by the contractor in the asbestos log book viewing record and this omission was not identified before the works began.
- There is a requirement that if a suspicion of asbestos is identified during works that this is immediately referred to the NCH Asbestos Officer and, if the suspected asbestos is disturbed, the job must be stopped and other safety measures taken. In this case the NCH Asbestos Officer was not informed for 5 days after the work had been completed. As a result those working on the project and any others in the vicinity had the potential to be exposed to health risks.

2.9 The Harvey Road incident indicates that the asbestos procedures were either not known or their importance was not understood by both NCH and the contractor. It is essential that this is addressed going forward. In this regard, NCH has undertaken a thorough investigation of the incident resulting in a formalised action plan to ensure identified issues are addressed.

2.10 Key enhancement opportunities include:

- The completion of annual compulsory asbestos training should be formally monitored and if possible, notification should be provided by the Learning and Development Team to relevant line managers where operative training is due to expire or has expired and a refresher course is required.

2.11 Finally, we wish to thank all members of staff for their availability, co-operation and assistance during the course of our review.

PKF (UK) LLP
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3 Detailed Findings

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos</p>	<p>Asbestos Policies Asbestos Management is covered within two Asbestos Policies which were both in the process of being revised at the time of audit, and were in draft form.</p> <p>The first is maintained by the Senior Health and Safety Advisor and primarily relates to Health and Safety aspects for day to day repairs. This provides guidance for the management of asbestos in NCH workplaces. The revised draft also contains the Asbestos Procedure Guidance within the document.</p> <p>The second policy is maintained by the Asset Management Team and is focussed on larger scale planned work programmes and contains increased detail over asbestos surveying and revised legislation (2012).</p> <p>A formal Health and Safety Policy is in place, having been approved in January 2013, which references NCH's commitment towards the management of asbestos. The document is due to go 'live' in April 2013, along with the revised Asbestos policies.</p> <p>HSE Guidance Health and Safety guidance over asbestos (HSG 262) specifically states that organisations should provide "<i>adequate asbestos training of trades people (eg to cover awareness, including identification) and work procedures; arrangements must be in place to ensure that asbestos registers or records are checked before work commences and there are procedures for dealing with any suspect/suspicious/unknown material, ie stop work, check material etc;</i>".</p>	<p>The Organisation has recently revised its Asbestos Management Policies. Review identified that the draft policies cover the core requirements of health and safety guidance in relation to the management of asbestos and should therefore enable the organisation to manage asbestos risk if appropriately applied.</p> <p>At the time of review these policies were in draft form and due for approval (April 2013).</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Review identified that the HS03 Asbestos Management Policy and Procedure contained detailed guidance on procedures for work in, on or around domestic properties, in the form of both a flow chart and supporting notes. This guidance specifically states that <i>'Anyone who may come into contact with asbestos or manage work where asbestos may be encountered must have received Asbestos Awareness Training and must be retrained annually'</i> and that operatives must check the <i>'NCH Asbestos Register prior to work being initiated/issued'</i>.</p> <p>The Asset Management Asbestos Policy also makes clear reference to the requirement that asbestos information (the register or log-books) <i>'must be checked before any work is done that may disturb the fabric of the building'</i>. The policy also clearly defines the required reporting procedure for any works which may involve asbestos.</p> <p>Risk Assessment A Risk Assessment for asbestos procedures was produced in 2010 and is subject to review on an annual basis. We confirmed that the assessment has been reviewed in the prior 12 months, with no changes deemed necessary (the change to legislation in 2012 did not impact on the risk assessment).</p> <p>The assessment specifically references required procedures for the accidental disturbance of asbestos material and training requirements to ensure awareness of the presence of asbestos, in line with the guidance provided within HSG 262 as outlined above.</p>	<p>As above.</p> <p>The Organisation is effectively implementing its asbestos management framework, having undertaken an asbestos risk assessment and through surveying of the housing stock.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Surveying The majority of Housing Stock (approximately 90% at the time of review) has been subject to an asbestos survey (Type 2: Management Survey) with the results having been compiled into the Asbestos Register.</p> <p>Where properties are yet to be surveyed, the register for that property will highlight the 3 worst asbestos cases for that Property Archetype for reference. Type 3 surveying would however, be required where extensive work is to be undertaken (Refurbishment and Demolition surveys).</p> <p>The intention to survey 100% of the housing stock exceeds the requirements outlines within HSE Asbestos: The Survey Guide (Second edition) which states: <i>"A proportion should be surveyed until the results demonstrate as far as reasonably practicable that there is consistency in the range of ACMs in the property type"</i>.</p> <p>Survey Process The full stock survey process began in 2009 with Savills (Estate Service Providers) contracted to perform the stock condition survey. At the time of review approximate 90% of the housing stock has been covered by surveys, with the process on-going.</p> <p>On completion of the current round of stock condition surveys, NCH will look to assess any remaining outstanding properties and plan how to gain access to complete the process.</p> <p>Although not required by legislation, Refurbishment and Demolition (Type 3) Surveys may be performed in the meantime on a selection of currently un-surveyed properties to form a detailed estimation of properties of that Archetype although this process is not formally planned.</p>	<p>The Organisation intends to perform asbestos assessments on 100% of its housing stock, exceeding the requirements of the HSE asbestos guidance and at the time of review, has undertaken asbestos surveys on approximately 90% of the housing stock. On completion of the current round of stock condition surveys the organisation may however be left with a number of residual properties which have not been surveyed due to difficulties in gaining access.</p> <p>On completion of this survey round, NCH should ensure that a formalised strategy for gaining access to outstanding properties is produced to facilitate the completion of the full stock survey process. Through discussion it was confirmed that the Asset Management Team intend to devise such a strategy although detailed plans are yet to be formalised.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Reporting of Asbestos Management The progress of the full stock asbestos survey programme is reported to the Executive Management Team through the Covalent system as a Key Performance Indicator. The indicator shows the percentage of the housing stock which has been subject to an asbestos survey.</p> <p>Asbestos Register The Asbestos Register is maintained within a web-portal which can be accessed by permitted partners of NCH. The register is maintained and updated by the Assistant Asbestos Officer. The primary content of the register is the result of asbestos surveying (Old Type 2) of housing stock. At the time of review approximately 90% of the stock has been subject to an asbestos survey.</p> <p>The system is updated with the removal of asbestos through a set process. Where a partner intends to perform work which requires contact with asbestos, an 'Asbestos Request' email is completed by the partner and forwarded to the Asset Management Team. The required asbestos work is then assigned a unique job number before being assigned to the asbestos contractor C&D.</p> <p>On completion of the work an invoice is issued to NCH and the Assistant Asbestos Officer will update the asbestos register by removing the relevant asbestos entry for that property. The register maintains a record of any completed removed asbestos works on the property summary.</p> <p>System Purchase A new system 'Keystone' has been purchased as a new asbestos survey database with increased functionality and it is intended to migrate to the system in the beginning of the new year (April 2013).</p>	<p>The Organisation is effectively implementing its asbestos management framework, having undertaken an asbestos risk assessment and through surveying of the housing stock.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Register Access and Monitoring Partners are provided access to the asbestos register where necessary and system functionality enables the production of an audit log detailing all users and the property registers they have viewed in a selected time period.</p> <p>The Assistant Asbestos Officer produces this reporting on a monthly basis and then circulates the report to all contract managers. The contract managers can then perform a review to gain assurance that partners are performing adequate reviews of the asbestos register where required. Through review we were able to confirm that this process was completed on the 1st February as expected.</p> <p>Mechanisms for Updating Management Knowledge in line with Legislation In addition to asbestos training, a Health and Safety 'Bullet-In' folder is maintained on a shared network drive accessible by managers. Bullet-Ins are produced by the Senior Health and Safety Advisor as and when required.</p> <p>Furthermore, such developments would be discussed within the Health and Safety Committee which meets every six weeks and is minuted. Review of the March 2012 minutes identified that the new Control of Asbestos Regulations (2012) were discussed at the meeting under 'New & Emerging Risk'. The Committee subsequently requested that the Senior Health and Safety Advisor produce a briefing note summarising legislative changes for circulation, resulting in the Control of Asbestos Regulations 2012 'Bulletin', which was issued in May 2012.</p>	<p>As above.</p> <p>There are mechanisms in place at the Organisation to ensure that Management and Operatives are aware of legislative and other relevant changes in relation to asbestos management.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Briefing notes are also issued which are focussed for Operatives and will be circulated through team meetings. In December 2012 the Organisation also produced hard copy Operative Health, Safety and Environment Handbook files which include all previously issued briefing notes and bulletins in small, portable folders. Within the Handbook asbestos is acknowledged as a high risk area in the summary section and folders also include additional relevant guidance such as the general activities risk assessment, inclusive of the asbestos risk assessment.</p> <p>These Handbooks were then issued to every Operative alongside a presentation by the Senior Health and Safety Advisor when they were delivered. Discussion with the Senior Health and Safety Advisor identified that issue registers were maintained to ensure all operatives had received their handbook and that at the time of review, the only Operatives yet to be issued with the handbook are on long term leave, with the total outstanding being less than 10. Additionally, each handbook is recorded with the relevant operatives unique pay number so if a misplaced handbook is found it can be returned to the operative.</p> <p>When a change or addition to the provided guidance is required, a replacement/additional sheet can be printed to be added to the Handbook and issued at a team meeting. This amendment can then be recorded by Operatives within an 'amendment sheet' within the Handbook. Using this record, if necessary, management can check if an Operative has the most up to date version of the handbook.</p> <p>At the time of review, no amendments have been made due to the handbook's recent issue.</p>	<p>As Above</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>Asbestos Training Induction training in relation to asbestos is conducted for all Operatives, with an additional refresher course required every 12 months (along with four other areas of compulsory annual health and safety training). While not compulsory for non-maintenance staff, training is available if requested.</p> <p>On the completion of training, Operatives sign a training register held by the Learning and Development Administrator to record training as completed. However, the completion of refresher training is not formally monitored and it is considered the responsibility of relevant line managers to ensure staff training is up to date.</p> <p>Training Materials We reviewed the training materials utilised in both the induction and refresher training and noted the materials were recently revised in December 2012 to encompass recent legislative changes.</p> <p>Testing We reviewed a sample of training records for Operatives, including 5 new starters and 15 further Operatives, identifying two instances where induction training could not be evidenced as provided to new starters and two instances where refresher training could not be evidenced as provided to existing staff within the previous 12 months.</p> <p>In the cases of refresher training, at the time of review both employees identified had been employed by NCH for over 10 months. The NCH Asbestos Risk Assessment and Policy both state that asbestos induction training should be provided as soon as possible after commencing employment.</p>	<p>A training programme is in place, with Operatives required to complete asbestos training on a 12 month basis.</p> <p>The completion of compulsory training, whilst recorded, is not formally monitored. Additionally, during the review, sample testing identified several instances where training could not be evidenced as completed within the required time frames.</p> <p>At the time of review, the Learning and Development Administrator was in the process of reviewing all operative training records to identify any instances where asbestos training has expired.</p> <p>R1 The completion of annual compulsory asbestos training should be formally monitored.</p> <p>If possible, notification should be provided by the Learning and Development Team to relevant line managers where operative training is due to expire or has expired and a refresher course is required.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not be in compliance with the legislative requirements regarding Asbestos (Continued).</p>	<p>For the two Operatives where refresher training could not be evidenced as undertaken in the previous 12 months, the last recorded dates of training were in 2010 and 2008 respectively.</p> <p>The reasoning for the above is being investigated by the Learning and Development Administrator.</p>	<p>As above.</p>
<p>The Organisation may not monitor and report on Asbestos</p>	<p>Tenant Communication Tenants are kept informed of any asbestos within their property through two methods.</p> <p>On the issue of a new tenancy, the Voids team will complete a new tenancy pack for the tenant. Within the pack will be a print out of the most recent asbestos report for that property from the asbestos register along with general asbestos guidance. Where a property has not been surveyed, the pack will include just the general guidance information.</p> <p>Furthermore, approximately 2 yearly, the Organisation will write to all tenants with a copy of their properties 'Asbestos Survey Report' (the asbestos register entry for that property). This process was last undertaken in December 2012 for all properties with a completed asbestos survey (approximately 90% of the housing stock) and was managed through a third party mailing agent.</p> <p>Information on asbestos, including a fact sheet and the contact details for the Asbestos Team are also made available through the NCH website.</p> <p>Testing Retrospective testing of issues of asbestos survey reports within new tenancy packs could not be undertaken due to the files being passed to tenants and copies not being retained (asbestos reports themselves are retained as the asbestos register).</p>	<p>Tenants are made aware of asbestos within their property. Where asbestos surveys have not been completed, general asbestos information and guidance is provided to tenants.</p> <p>Over 85% of the housing stock have were issued with asbestos survey reports for that property via a mailshot in December 2012.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>The Organisation may not monitor and report on Asbestos (Continued).</p>	<p>Likewise, the mailshot conducted in December 2012 was managed by a third party mailing agent and as such, records could not be reviewed.</p> <p>We reviewed the Invoice for the mailshot from the mailing agent, which identified that 25,194 properties were issued with letters. This amounts to roughly 85% of the housing stock (29,583) and is in line with our understanding of the number of properties that would have a completed asbestos survey at the time.</p>	<p>As above.</p>
<p>Health and Safety procedures for asbestos were not followed in relation to the refurbishment of the Harvey Road depot and potential identification of asbestos (both pre and post potential identification).</p>	<p>Policy Requirements We reviewed the asbestos management procedures that were in place at the time of the incident and identified two key stages: first, requirements prior to work being undertaken and second, on the accidental disturbance or discovery of suspected asbestos material.</p> <p><u>Prior to Work Being Undertaken</u> Review of the Health and Safety Procedure (HS02 Asbestos) in place at the time identified a detailed workflow for the management of Asbestos in Workplaces and Common Areas.</p> <p>This workflow specifically states that the Premises or Facilities Manager should 'Refer NCH operative(s)/contractors operatives to Asbestos Log Book and Asbestos Survey before work begins'.</p> <p>Review of the investigation log identified that the contractor who performed the work on-site verbally confirmed that they had checked the relevant asbestos information prior to commencing work and that they were aware that no asbestos material was present in the existing flooring. This was not however evidenced through the signing of the asbestos log book viewing record.</p>	<p>From review of relevant policies and the Harvey Road Incident Investigation Report, it is clear that the asbestos management procedures were not followed in two significant respects; Before works commence there is a requirement for the contractor to review the asbestos log book and to sign the asbestos log book viewing record to evidence that this was carried out. The purpose of the log book viewing record is to provide evidence that the contractor was aware of any asbestos risks thereby protecting the safety of the contractor's staff and protecting NCH from claims from the contractor that they were mis-informed. During the investigation process it was noted that the relevant contractor verbally stated he had reviewed the asbestos log book prior to commencing work, however this was not evidenced by the contractor in the asbestos log book viewing record and this omission was not identified before the works began.</p> <p>There is also a requirement that if a suspicion of asbestos is identified during works that this is immediately referred to the NCH Asbestos Officer and, if the suspected asbestos is disturbed, the job must be stopped and other safety measures taken. In this case the NCH Asbestos Officer was not informed for 5 days after the work had been completed. As a result those working on the project and any others in the vicinity had the potential to be exposed to health risks.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>Health and Safety procedures for asbestos were not followed in relation to the refurbishment of the Harvey Road depot and potential identification of asbestos (both pre and post potential identification) (Continued).</p>	<p>We reviewed the relevant asbestos survey whilst on site and confirmed that no asbestos material was recorded as present in the relevant area.</p> <p><u>On Discovery or Suspicion of Asbestos Material</u> The same procedural workflow states that if <i>'during the work suspected asbestos is identified... Refer details to the NCH Asbestos Officer'</i>.</p> <p>Furthermore, the relevant Asbestos Risk Assessment states: <i>'If suspected asbestos is disturbed:</i> <ul style="list-style-type: none"> - The job must be stopped. - The area must be evacuated. - The area must (where practicable) be sealed - Others in the area must be notified. - The relevant manager must immediately be notified. - The NCH Asbestos Team (on 62076) must be notified.' </p> <p>Review of the incident identified that the Senior Health and Safety Advisor was not notified of concerns until 5 days after the work had been completed. As a result of the failure to notify the Senior Health and Safety Advisor or Asbestos team, the work was completed without interruption.</p> <p>Investigation and Action Plan As a result of the above incident a full investigation was undertaken. The investigation concluded that no asbestos material was located in the relevant area and that the material sample provided did not originate from the Harvey Road corridor.</p>	<p>The Harvey Road incident indicates that the asbestos procedures were either not known or their importance was not understood by both NCH and the contractor. It is essential that this is addressed going forward. In this regard, NCH has undertaken a thorough investigation of the incident resulting in a formalised action plan to ensure identified issues are addressed.</p>

Key Risks	Key Controls and Mitigating Action	Conclusion
<p>Health and Safety procedures for asbestos were not followed in relation to the refurbishment of the Harvey Road depot and potential identification of asbestos (both pre and post potential identification) (Continued).</p>	<p>An action plan was produced as a result of the investigations findings, which included the requirement that the local asbestos register viewing records should be evidenced as reviewed prior to work being undertaken through its signing and dating by the relevant contractor.</p> <p>Review of the draft Asset Management Asbestos Policy has identified that this requirement is specifically referenced as follows: <i>'This [The Asbestos Log Book] must be checked and signed by those who have to carry out any work that may disturb the building fabric. The responsible person within the building where work is to take place must ensure that those undertaking the work on that building check and sign the Asbestos Log Book'.</i></p>	<p>As above.</p>

4 Action Plan

Ref.	Findings	Recommendations	Priority	Management Response	Responsibility / Due Date
R1	<p>A training programme is in place, with Operatives required to complete asbestos training on a 12 month basis.</p> <p>The completion of compulsory training, whilst recorded, is not however formally monitored. Additionally, during the review, sample testing identified several instances where training could not be evidenced as completed within the required time frames.</p> <p>At the time of review, the Learning and Development Administrator was in the process of reviewing all operative training records to identify any instances where asbestos training has expired.</p>	<p>The completion of annual compulsory asbestos training should be formally monitored.</p> <p>If possible, notification should be provided by the Learning and Development Team to relevant line managers where operative training is due to expire or has expired and a refresher course is required.</p>	High	<p>We are aware that, having devolved delivery of annual refresher training to line management, there has been some irregularity in the standard of record keeping, meaning that we have been unable to evidence some training that has in fact taken place. We will therefore work together with operational line managers and our Learning and Development Team to ensure that all refresher training is properly recorded, and training records kept up to date. As this refresher training is annual, we will be able to rectify all records this year, but in any case will prioritise this activity so that records are up to date for each relevant employee by the end of July 2013.</p> <p>In respect of notifications about expired training: this will become automatic once records are migrated to a new Learning Management System which is being procured by the Learning & Development Team. There is limited functionality for the existing learning database to do this and we are working with our Learning and Development Team on a solution in the short term.</p>	<p>Ian Rabett Head of Health & Safety 31.07.13</p> <p>Ian Rabett Head of Health & Safety 31.05.13</p>

5 Definitions

Assurance Level	Definition
Fully meets expectations	Our audit work provides assurance that the arrangements should deliver the objectives and risk management aims of the organisation in the area under review and meet or exceed relevant external requirements. There is only a small risk of failure or non-compliance.
Substantially meets expectations	Our audit work provides assurance that the arrangements should deliver the key objectives and risk management aims of the organisation in the area under review and meet most relevant external requirements. There is some risk of failure or non-compliance.
Partly meets expectations	Our audit work provides assurance that the arrangements will deliver only some of the key objectives and risk management aims of the organisation in the area under review or may not meet relevant external requirements. There is a significant risk of failure or non-compliance.
Does not meet expectations	Our audit work provides little assurance. The arrangements will not deliver the key objectives and risk management aims of the organisation in the area under review or will not meet relevant external requirements. There is an almost certain risk of failure or non-compliance.

Recommendation priority	Definition
High priority recommendations	Those that failure to address would result in a significant and unacceptable risk to the organisation arising or continuing.
Medium priority recommendations	Those that failure to address would result in a moderate risk to the organisation arising or continuing or relate to significant best practice improvements.
Low priority recommendations	Those that failure to address would result in a minor risk to the organisation arising or continuing or relate to moderate best practice improvements.