

London Borough of Croydon Internal Audit Report for the period 1 April 2018 to 31 October 2018

Confidentiality and Disclosure Clause

This report ("Report") was prepared by Mazars LLP at the request of London Borough of Croydon and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our internal audit work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, Internal Audit have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

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Please refer to the Statement of Responsibility in Appendix 3 of this report for further information about responsibilities, limitations and confidentiality.

Internal Audit activity

- 1. During the first seven months of the 2018/19 financial year the following work has been delivered:
 - 58% of the 2018/19 planned audit days have been delivered
 - 71 planned audits (excluding ad hoc and fraud work) commenced, either by setting up the files, attending scope meetings or by performing the audits. This was made up of:-
 - 51 system audits commenced and/or were completed;
 - probity audits commenced and/or were completed; and,
 - 6 computer audits commenced and/or were completed.

In addition:

- 8 new ad hoc or fraud investigations commenced and/or were completed.

Internal Audit Performance

- To help ensure that the internal audit plan supported the Risk Management Framework and therefore the Council Assurance Framework, the 2018/19 internal audit plan was substantially informed by the risk registers. The 2018/19 internal audit plan was presented to the General Purposes and Audit Committee on 15 March 2018.
- 3. Work on the 2018/19 audit plan commenced in April 2018 and delivery is now well underway.
- 4. Table 1 details the performance for the 2018/19 audit plan against the Council's targets. At 31 October 2018 Internal Audit had delivered 58% of the planned audit days and 30% of the planned draft reports. Although the planned drafts are behind target, there are a number of audits where the reports are close to being issued and work has either commenced, is in progress or draft stage for over 80% of the audit plan.

Table 1: Performance against targets

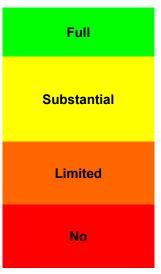
Performance Objective	Annual Target	Year to Date Target	Year to Date Actual	Perform ance
% of planned 2018-19 audit days delivered	100%	58%	58%	A
Number of 2018-19 planned audit days delivered	1050	609	613	•
% of 2018-19 planned draft reports issued	100%	40%	30%	•
Number of 2018-19 planned draft reports issued	88	35	26	•
% of draft reports issued within 2 weeks of exit meeting	85%	85%	89%	A
2017/18 % of priority one recommendations implemented at the time of the follow up audit	90%	90%	82%	•
2017/18 % of all recommendations implemented at the time of the follow up audit	80%	80%	78%	•
2016/17 % of priority one recommendations implemented at the time of the follow up audit	90%	90%	92%	A
2016/17 % of all recommendations implemented at the time of the follow up audit	80%	80%	84%	A



Performance Objective	Annual Target	Year to Date Target	Year to Date Actual	Perform ance
2015/16 % of priority one recommendations implemented at the time of the follow up audit	90%	90%	91%	•
2015/16 % of priority all recommendations implemented at the time of the follow up audit	80%	80%	86%	•
% of qualified staff engaged on audit	40%	40%	44%	•

Audit Assurance

5. Internal Audit provides four levels of assurance as follows:



The systems of internal control are sound and achieve all systems objectives and that all controls are being consistently applied.

The systems of internal control are basically sound, there are weaknesses that put some of the systems objectives at risk and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk. (*Note - Substantial assurance is provided on School audits.)

Weaknesses in the systems of internal control are such as to put the systems objectives at risk, and/or the level of non-compliance puts the system objectives at risk.

The system of internal control is generally weak leaving the system open to significant error or abuse and /or significant non-compliance with basic controls leaves the system open to error or abuse.

6. Tables 2 lists the audits for which final reports were issued from 1 April to 31 October 2018. Details of the key issues arising from these reports are shown in Appendix 1.

Table 2: 2018/19 Final audit reports issued from 1 April 2018 to 31 October 2018:

Audit Title	Risk Level	Assurance Level	Planned Year
Non-school audits			
Croylease	High	Limited	2018/19
GDPR in Schools	High	Limited	2018/19
Libraries Income Collection	High	Limited	2018/19
Coroner's Service	High	Substantial	2018/19
Discretionary Housing Payments	High	Substantial	2018/19
Liesure Contract Management	High	Substantial	2018/19
Parking CCTV	High	Substantial	2018/19
Cashiers (Cash Handling)	High	Full	2018/19

Follow-up audits - effective implementation of recommendations

- 7. During 2018/19 in response to the Council's follow-up requirements, Internal Audit has continued following-up the status of the implementation of the 2015/16, 2016/17,2017/18 audits. No 2018/19 follow up audits are yet due.
- 8. Follow-up audits are undertaken to ensure that all the recommendations raised have been successfully implemented according to the action plans agreed with the service managers. The Council's target for audit recommendations implemented at the time of the follow-up audit is 80% for all priority 2 & 3 recommendations and 90% for priority 1 recommendations.

Performance Objective	Torget	Performance (to date)					
	Target	2013/14	2014/15	2015/16	2016/17	2017/18	
Percentage of priority one recommendation implemented at the time of the follow up audit	90%	100%	100%	91%	92%	82%	
Percentage of all recommendations implemented at the time of the follow up audit	80%	96%	94%	86%	84%	78%	

The results of those for 2015/16, and 2016/17 and 2017/18 audits that have been followed up are included in Appendixes 2, 3, and 4 respectively.

9. Appendix 2 shows the follow-up audits of 2015/16 audits undertaken to date and the number of recommendations raised and implemented. 86% of the total recommendations were found to have been implemented and 91% of the priority 1 recommendations which have been followed up have been implemented. The outstanding priority 1 recommendations are detailed below:

Audit Title	Executive Director Responsible	Risk Level	Assurance Level	Summary of issues arising in priority 1 recommendations
EMS Application	Richard Simpson	High	Limited	A recommendation was raised due to the absence of an effective disaster recovery plan for the EMS application.
				The response to the follow up is that this is being worked on with Capita and a solution planned for January 2019.
ICT ~Service Delivery ITIL Framework	Richard Simpson	High	Limited	A recommendation was raised as it was identified that the development of an appropriate Business Impact Review (BIR) to assist in the design of both the IT Service Disaster Recovery Plan (DRP) and the associated Business Continuity Plan (BCP) are currently at an embryonic stage and no DRP or BCP solutions have been recently tested as effective. The response to the follow up is that this is being worked on with Capita and a solution planned for January 2019.

10. Appendix 3 shows the 2016/17 follow-up audits undertaken to date and the number of recommendations raised and implemented. 84% of the total recommendations were found to have been implemented and 92% of the priority 1 recommendations which have been followed up have been implemented. The outstanding priority 1 recommendations are detailed below:

Audit Title Di	xecutive virector desponsible	Assurance Level	Summary of issues arising in priority 1 recommendations
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Audit Title	Executive Director Responsible	Risk Level	Assurance Level	Summary of issues arising in priority 1 recommendations
Adult Care Packages	Guy Van Dichele	High	Limited	A priority 1 recommendation was raised as in fifteen out of twenty instances sampled evidence could not be obtained to confirm client consent to the contents of the care package.
				A priority 1 recommendation was raised as in ten out of fifteen instances sampled evidence could not be provided of approval of a care package by an individual or body with the correct delegated authority.
				A priority 1 recommendation was raised as in eight out of twenty instances sampled there was no evidence of a six to eight week review. In six instances we could not be provided with evidence that an annual review was undertaken.
				The reponse to the follow up of the above explained that various actions had been taken to resolve the above, however Internal Audit has sought further clarification and, in some instances, evidence of these actions.

11. Appendix 4 shows the 2017/18 follow-up audits undertaken to date and the number of recommendations raised and implemented. 78% of the total recommendations were found to have been implemented and 82% of the priority 1 recommendations which have been followed up have been implemented. The outstanding priority 1 recommendations are detailed below:

Audit Title	Executive Director Responsible	Risk Level	Assurance Level	Summary of issues arising in priority 1 recommendations
Abandoned Vehicles	Shifa Mustafa	High	No	A priority 1 issue was raised as the records of reported abandoned vehicles on the Access 2003 database was incomplete, with images, links to '7 day' notices and the dates removed and outcomes not always being recorded.
				A priority 1 issue was raised as although the estimated contract value for abandoned vehicle removal is over £160k, there has been no tendering for this service and there is no contract in place between Tran-Support and the Council.
				Reponses to both the above have been obtained, detailing that, 'The development of an AVS module within CRM has been delayed by approval to develop a new system to replace CRM' and that, 'A soft Market Testing brief has been provided and is now being refined with assistance from Procurement.'
Pay and Display Meter	Shifa Mustafa	High	Limited	A priority 1 issue was raised the contract between NSL and the Council expired in 2015.
Maintenance and Income Collection				The response provided details that this is still in progress, with tender documentation being with Procurement and the tender to be issued shortly.
Appointeeships	Mark Meehan	High	Limited	A priority 1 issue was raised as although payee bank accounts were being checked to invoices or other payment documents, there is a risk that the bank details on these documents may be incorrect.
				The latest response detailed that the new manager has plans to stop existing payments completely, which is being progressed. This means that any new or changes to existing beneficiaries will go through a more robust check.
Health Visiting	Guy Van Dichele	High	Limited	A priority 1 issue was raised as while the Council receives monthly detailed reports on key performance indicators and has conducted a recent extensive six month Health Visiting Services Review, appropriate contract monitoring processes were not in place to obtain assurance of the general conditions in the S75 Agreement and the actual processes undertaken by CHS, including those for safeguarding.



Audit Title	Executive Director Responsible	Risk Level	Assurance Level	Summary of issues arising in priority 1 recommendations
				The response to the follow up has provided assurance that the above are being progressed through ongoing dialogue with the contractor, but are not yet resolved.
Brokerage	Richard Simpson	High	Limited	A priority 1 issue was raised as it was confirmed that providers outside of the signed Integrated Framework Agreement (IFA) were being used regularly for care provision of clients.
				A priority 1 issue was raised as there was no evidence provided of inspections having occurred at three of the five providers sampled.
				The reponse to the follow up was that, A decision has been taken to refresh the IFA in 18/19, which will address the issue of legacy provision, which is becoming less over time. Furthermore, regarding the inspections, that a restructure and recruitment was taking place.
St Joseph's Federation	Eleni loanndes	Medium	Limited	A priority 1 recommendation was raised as Appropriately authorised orders were not available for eight of the fifteen transactions sampled.
				A priority 1 recommendation was raised as appropriate goods or services received checks were not evidenced for thirteen of the fifteen transactions sampled.
				The response provided detailed that the authorisation and goods received checking processes were being improved and we are awaiting confirmation.

Appendix 1: Key issues from finalised audits

2018/19 audits			
Audit Title	Risk Level	Assurance Level & Number of Issues	Summary of key issues raised.
Non School Audits			
Croylease	High	Limited (Two priority 1, five priority 2 and one priority 3 issue	Two priority 1 recommendations were raised as sample testing found that current lease agreements were not in place for 5 of the 10 propeties sampled and in some cases evidence of the required gas safety or electrical inspections or fire safety certificates was not available.
GDPR in Schools	High	Limited (Eight priority 2 issues)	No priority 1 issues
Libraries Income Collection	High	Limited (Two priority 1, two priority 2 and one priority 3 issue)	Two priority 1 issues were raised, one relating to the approval and control over the waiver of fines and the other relating to the lack of reconciliations between income collected and income banked and coded to Oracle ledger codes.
Coroner's Service	High	Substantial (Three priority 2 issues)	No priority 1 issues raised
Discretionary Housing Payyments	High	Substantial (One priority 2 and two priority 3 issues)	No priority 1 issues raised
Liesure Centre Contract Management	High	Substantial (Two priority 2 issues.)	No priority 1 issues raised
Parking CCTV	High	Substantial (One priority 2 issue)	No priority 1 issues raised
Cashiers (Cash Handling)	High	Full (One priority 3 issue)	No priority 1 issues raised

Appendix 2 - Follow-up of 2015/16 audits (Incomplete follow ups only)

Financial	Audit Followed-up	Executive Director	Risk Level	Assurance Level &	Total	Implemented		
Year	Addit Followed-up	Responsible	KISK Level	Status	Raised	Total	Percentage	
Non School Audits								
2015/16	Performance Monitoring Adult Social Care	Guy Van Dichele	High	Limited (2 nd follow up in progress)	9	3	33%	
2015/16	EMS Application	Richard Simpson	High	Limited (6 th follow up in progress)	4	1	25%	
2015/16	ICT Service Delivery ITIL Framework	Richard Simpson	High	Limited (4 th follow up in progress)	2	1	50%	
2015/16	Looked After Children (placed in another LA area)	Eleni Ioannides	High	Substantial (3 rd follow up in progress)	6	4	66%	
2015/16	Connected Croydon – Programme and Project Management	Shifa Mustafa	High	Substantial (2 nd follow up in progress)	4	2	50%	
2015/16	Waste Recycling	Shifa Mustafa	High	Substantial (5 th follow up in progress)	3	1	33%	
2015/16	Internal Network	Richard Simpson	High	Substantial (3 rd follow up in progress)	2	1	50%	
2015/16	EU Procurement Directives	Richard Simpson	High	Substantial (3 rd follow up in progress)	2	0	0	
	ol Audits Sub Total: Indations and implementation f	rom audits that h	ave had res	ponses	235	196	83%	
Non-School Audits Sub Total: Priority 1 Recommendations from audits that have had responses						20	91%	
School Audits Sub Total: Recommendations and implementation from audits that have had responses						48	100%	
School Audits Sub Total: Priority 1 Recommendations from audits that have had responses						0	N/a	
Recommendations and implementation from audits that have had responses						244	86%	
Priority 1 R	ecommendations from audits	22	20	91%				



Appendix 3 - Follow-up of 2016/17 audits (Incomplete follow ups only)

Financial	Audit Followed-up	Executive Director	Risk Level	Assurance Level		Implemented	
Year	Addit Followed-up	Responsible	KISK Level	Status	Raised	Total	Percentage
Non Schoo	l Audits						
2016/17	Adult Care Packages	Guy Van Dichele	High	Limited (2 nd follow up in progress)	7	4	57%
2016-17	Contract Formalities and Storage of Contracts	Richard Simpson	High	Limited (1st follow up in progress)	4	-	-
2016-17	Contract and Tender Regulation Compliance	Richard Simpson	High	Limited (2 nd follow up in progress)	8	6	75%
2016/17	HMRC Compliance	Richard Simpson	High	Substantial (4 th follow up in progress)	5	3	60%
2016/17	Anti-Social Behaviour	Shifa Mustafa	High	Substantial (3 rd follow up in progress)	9	4	44%
2016/17	Licensing Income	Shifa Mustafa	High	Substantial (3 rd follow up in progress)	2	1	50%
2016/17	Clinical Governance	Guy Van Dichele	High	Substantial (3 rd follow up in progress)	3	1	33%
2016/17	London Road (Section A) Public Realm Improvements	Shifa Mustafa	High	Substantial (1 st follow up in progress)	3	-	-
	ol Audits Sub Total: ndations and implementation f	rom audits that h	ave had res	nonses	236	201	85%
	ol Audits Sub Total:	. o uuuno muu	avo naa roo	policoo			
Priority 1 Recommendations from audits that have had responses						18	86%
School Audits Sub Total: Recommendations and implementation from audits that have had responses					206	172	83%
School Audits Sub Total: Priority 1 Recommendations from audits that have had responses						16	100%
Recommer	Recommendations and implementation from audits that have had responses						84%
Priority 1 Recommendations from audits that have had responses						34	92%



Appendix 4 - Follow-up of 2017-18 audits

Financial Year	Audit Followed-up	Executive Director	Risk Level	Assurance Level &	Total Raised	Implemented	
		Responsible		Status		Total	Percentage
Non School	Audits					·	
2017/18	Mayors Charity	Richard Simpson	High	No (3 rd follow up in progress)	13	10	77%
2017/18	Abandoned Vehicles	Shifa Mustafa	High	No (3 rd follow up in progress)	10	7	70%
2017/18	Budget Management - People	Eleni loannides	High	Limited (1 st follow up in progress)	2	-	-
2017/18	Appointeeships	Vacant	High	Limited (3 rd follow up in progress)	7	5	71%
2017/18	Health Visiting	Guy Van Dichele	High	Limited (1 st follow up in progress)	2	-	-
2017/18	Direct Payments	Guy Van Dichele	High	Limited (No further follow up)	4	4	100%
2017/18	Special Sheltered Housing	Richard Simpson	High	Limited (3 rd follow up in progress)	10	4	40%
2017/18	Unaccompanied Asylum Seeking Children	Eleni loanndes	High	Limited (2 nd follow up in progress)	2	1	50%
2017/18	Croydon Enterprise Loan Fund	Shifa Mustafa	High	Limited (No further follow up planned)	5	5	100%
2017/18	Brokerage	Richard Simpson	High	Limited (2 nd follow up in progress)	10	2	20%
2017/18	Deprivation of Liberty Safeguards	Guy Van Dichele	High	Limited (No further follow up)	4	4	100%
2017/18	Registrars	Vacant	High	Limited (No further follow up)	6	5	83%
2017/18	Food Safety	Shifa Mustafa	High	Limited (No further follow up)	11	9	82%
2017/18	Pay and Display Meter Maintenance and Income Collection	Shifa Mustafa	High	Limited (3 rd follow up in progress)	4	3	75%
2017/18	Tree Root Inspections	Shifa Mustafa	High	Limited (No further follow up)	6	5	83%
2017/18	ICT Capita Contract	Richard Simpson	High	Limited (No further follow up)	1	1	100%



Financial Year	Audit Followed-up	Executive Director Responsible	Risk Level	Assurance Level & Status	Total Raised	Implemented	
						Total	Percentage
2017-18	SekChek Active Directory System Security	Richard Simpson	High	Limited (1st follow up in progress)	10	-	-
2017/18	Parking Enforcement and Income	Shifa Mustafa	High	Substantial (1 st follow up in progress)	5	-	-
2017/18	CALAT Income Collection	Shifa Mustafa	High	Substantial (3rd follow up in progress)	6	4	67%
2017-18	Open Book Accounting (Axis Europe plc)	Shifa Mustafa	High	Substantial (1 st follow up in progress)	3	-	-
2017-18	Temporary Accommodation Occupancy Checks	Vacant	High	Substantial (No further follow up)	3	3	100%
2017/18	Youth Offending service	Eleni loannides	High	Substantial (No further follow up)	3	3	100%
2017-18	Development Management	Shifa Mustafa	High	Substantial (1st follow up in progress)	5	-	-
2017/18	Place Review Panel	Shifa Mustafa	High	Substantial (No further follow up)	3	3	100%
2017/18	Croydon Equipment Solutions	Richard Simpson	High	Substantial (No further follow up)	7	7	100%
2017/18	Street Trading Income Collection	Shifa Mustafa	High	Substantial (1st follow up in progress)	9	-	-
2017-18	Transport Fleet Management	Richard Simpson	High	Substantial (1 st follow up in progress)	3	-	-
2017-18	Gifts and Hospitality	Richard Simpson	High	Substantial (1 st follow up in progress)	4	-	-
2017/18	Admitted Bodies	Richard Simpson	High	Substantial (1st follow up in progress)	4	-	-
2017/18	Unix (Linux) Operating System Security	Richard Simpson	High	Substantial (2 nd follow up in progress)	3	0	0
2017/18	Smitham 2016 School Heating Works	Shifa Mustafa	High	Substantial (1 st follow up in progress)	3	-	-
2017/18	Windows OS Security	Richard Simpson	High	Full (no further follow up planned)	2	2	100%
Non-School Audits Sub Total: Recommendations and implementation from audits that have had responses					118	85	72%
Non-School	Audits Sub Total:				28	22	79%



Financial Year	Audit Followed-up	Executive Director Responsible	Risk Level	Assurance Level & Status	Total Raised	Implemented	
						Total	Percentage
School Aud	its						
2017/18	Beulah Juniors	Eleni loannides	Medium	Limited (No further follow up)	13	11	84%
2017/18	Elmwood Infants School	Eleni loannides	Medium	Limited (No further follow up)	14	14	100%
2017/18	The Minster Nursery and Infant School	Eleni loannides	Medium	Limited (No further follow up)	17	15	89%
2017/18	Norbury Manor	Eleni loannides	Medium	Limited (2 nd follow up in progress)	12	8	67%
2017/18	St Joseph's Federation	Eleni loannides	Medium	Limited (2 nd follow up in progress)	25	9	36%
2017/18	Winterbourne Nursery and Infants	Eleni Ioannides	Medium	Limited (No further follow up)	18	16	89%
2017/18	St Mary's High School	Eleni loannides	Medium	Limited (No further follow up)	16	14	87%
2017/18	Crosfield Nursery and Selhurst Early Years	Eleni Ioannides	Medium	Substantial (No further follow up)	2	2	100%
2017/18	Purley Nursery	Eleni loannides	Medium	Substantial (No further follow up)	4	4	100%
2017/18	Tunstall Nursery	Eleni loannides	Medium	Substantial (No further follow up)	4	4	100%
2017/18	Thornton Heath Early Years Centre	Eleni loannides	Medium	Substantial (No further follow up)	7	6	86%
2017/18	All Saints C of E Primary	Eleni loannides	Medium	Substantial (No further follow up)	8	7	87%
2017/18	Elmwood Junior	Eleni loannides	Medium	Substantial (No further follow up)	3	3	100%
2017/18	Heavers Farm	Eleni loannides	Medium	Substantial (No further follow up)	10	10	100%
2017/18	Howard Primary	Eleni loannides	Medium	Substantial (2 nd follow up in progress)	13	5	54%
2017/18	Margaret Roper	Eleni loannides	Medium	Substantial (No further follow up)	16	13	81%
2017/18	Purley Oaks Primary	Eleni loannides	Medium	Substantial (No further follow up)	7	7	100%



London Borough of Croydon

Financial Year	Audit Followed-up	Executive Director Responsible	Risk Level	Assurance Level & Status	Total Raised	Implemented	
						Total	Percentage
2017/18	Rockmount Primary	Eleni Ioannides	Medium	Substantial (No further follow up)	6	5	83%
2017/18	Selsdon Primary	Eleni Ioannides	Medium	Substantial (No further follow up)	9	9	100%
2017/18	Woodcote Primary	Eleni loannides	Medium	Substantial (No further follow up)	7	7	100%
2017/18	Coloma Convent Girls' School	Eleni loannides	Medium	Substantial (3 rd follow up in progress)	14	11	78%
2017/18	Saffron Valley	Eleni loannides	Medium	Substantial (No further follow up)	6	6	100%
2017/18	Priory	Eleni loannides	Medium	Substantial (1st follow up in progress)	6	-	-
2017/18	Beaumont Primary	Eleni loannides	Medium	Full (No further follow up)	3	3	100%
2017/18	Archbishop Tenison	Eleni loannides	Medium	Full (No further follow up)	1	1	100%
School Audits Sub Total: Recommendations and implementation from audits that have had responses					235	190	81%
School Audits Sub Total: Priority 1 Recommendations from audits that have had responses				5	5	100%	
Recommendations and implementation from audits that have had responses				353	275	78%	
Priority 1 Recommendations from audits that have had responses				33	27	82%	



Statement of Responsibility

We take responsibility to the London Borough of Croydon for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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