

Cairngorms National Park Authority
INTERNAL AUDIT REPORT
Digital Communications and Social Media
Strategy
January 2018

LEVEL OF ASSURANCE	
Design	Operational Effectiveness
Moderate	Moderate



CONTENTS

Executive Summary	3
Detailed Findings and Recommendations	9
Observations	15
Appendices:	
I Staff Interviewed	16
II Definitions	17
III Terms of Reference	18






REPORT STATUS	
Auditors:	Sean Morrison
Dates work performed:	20 November 2017 - 08 January 2018
Draft report issued:	09 January 2018
Final report issued:	18 January 2018

DISTRIBUTION LIST	
David Cameron	Director of Corporate Services
Francoise Van Buuren	Head of Communications and Engagement
Audit Committee	Members

Restrictions of use

The matters raised in this report are only those which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

EXECUTIVE SUMMARY

LEVEL OF ASSURANCE (SEE APPENDIX II FOR DEFINITIONS)		SUMMARY OF RECOMMENDATIONS (SEE APPENDIX II)	
Design	 Generally a sound system of internal control designed to achieve system objectives with some exceptions.	High	
Effectiveness	 Evidence of non compliance with some controls, that may put some of the system objectives at risk.	Medium	 2
		Low	 3
		Total number of recommendations: 5	

OVERVIEW

Background

As part of the 2017-18 Internal Audit Plan, it was agreed that Internal Audit would perform a review of the digital communication and social media strategy in place within the Cairngorms National Park Authority (CNPA).

CNPA's communications and engagement team consists of a Head of Communications and Engagement, newly appointed Digital Campaigns Officer, Digital Communications Officer, Communication Officer and Press Officer.

The Digital Campaigns Officer is in the process of developing a new digital communications and social media strategy. Management intend for a first draft to be completed by the end of 2017 and for approval of the final version to be provided by the Board in March 2018.

CNPA has a number of guidance documents, policies and procedures which cover elements of digital communications and social media, including the Do's and Don'ts of Social Media Use guidelines, checklists for users, and communication guidelines. The Digital Communications Policy 2015 provides information on managing digital and social media, guidance for those communicating on behalf of CNPA on social media, use of personal social media accounts and key risks of digital communications, which include reputational damage, exposure to hacking and brand dilution.

On a daily basis, the communications and engagement team monitors the CNPA digital platforms by checking comments and responding via a number of digital tools, including: Hootsuite, a social media management platform; Facebook Pixels, which triggers cookies to track users as they interact with a website; Facebook Ads, which provides an efficient means to track conversions; Google Alerts, which provides automatic delivery notices on specific chosen topics; and hashtag trackers, which measures social media engagement for a particular campaign.

EXECUTIVE SUMMARY

OVERVIEW

Training has been provided to staff responsible for digital communications by third party organisations, such as Tuminds, and internally by management for the Board and staff in April 2017. The training provided has consisted of guidance on how to use social media, best practice viral posts, benefits of social media and analysis of social media statistics. Digital communications and social media guidance documents are also provided to employees as part of the induction process, as well as being available to all staff on the CNPA network.

An annual report is provided to the Board outlining CNPA's social media and communications performance, which includes comparisons against industry benchmarks and targets, on measures such as number of followers and connections. The report also provides narrative and updates on the prior year's communication programmes and campaigns, and a proposal for the upcoming year's communication programmes. Quarterly health reports are also produced and reviewed by the communications and engagement team which demonstrates the results from the digital platform activity that has been undertaken, and provides an opportunity for the team to determine what engagement produces the most favourable results.

Scope and Approach

The scope of our review was to assess whether there was a clear digital communications and social media strategy in place. We assessed whether there were clearly defined policies, procedures, roles, responsibilities and delegated authorities in relation to digital communications and social media use. We assessed whether queries and comments on social media are being monitored and responded to in an appropriate and timely manner. We assessed whether staff have been provided with digital communications and social media training. We also assessed whether feedback has been sought from key stakeholders on communications issued and where appropriate whether this feedback has been reflected in future communication plans.

Our approach was to review key documentation in relation to digital communications and social media, and interview key staff to assess whether the design of the controls is appropriate and controls are operating effectively and as described.

Good Practice

There are a number of areas of good practice in place in relation to CNPA's digital communications and social media strategy. We note that there are a range of policies, procedures and guidance notes in place to provide staff with important information in relation to digital communications and social media. Staff with digital communications and social media responsibilities have received sufficient training to be able to discharge their roles effectively.

EXECUTIVE SUMMARY

OVERVIEW

The Board is provided with a report on an annual basis outlining key statistics in relation to social media engagement, unique visits and views, and information on the programme performance for the year and proposed programmes for the upcoming year. Staff utilise a number of tools such as Hootsuite, Facebook Pixels, Google Alerts and hashtag tracking methods to monitor social media activity, in addition to daily monitoring by the Digital Campaigns Officer and Press Officer of social media comments.

Key Findings

Notwithstanding the areas of good practice noted above, we have noted areas where further improvement is possible, detailed below;

- **Digital communications and social media strategy** - There is no Digital Communications and Social Media strategy in place. We recognise that CNPA is currently in the process of developing a strategy, and management intend for this to be approved by the Board in March 2018;
- **KPIs** - CNPA does not have social media Key Performance Indicators (KPIs) in place. We note that management intend to develop these and are undergoing an exercise to determine effective KPIs;
- **Review of policies and procedures** - The Digital Communications policy states that it is due to be reviewed on an annual basis, however the document has not been formally reviewed since September 2015;
- **Delegated authority levels** - CNPA has not formally documented its delegated authority levels in relation to all aspects of digital communications and social media activity; and
- **Stakeholder feedback** - CNPA has not obtained feedback from stakeholders on the effectiveness of key digital communications and social media activity.

Conclusion

We are able to provide moderate assurance over the design and operational effectiveness of the controls in place relation to CNPA's digital communications and social media strategy.

EXECUTIVE SUMMARY

RISKS REVIEWED GIVING RISE TO NO FINDINGS OF A HIGH OR MEDIUM SIGNIFICANCE


- ✓ Policies, procedures, roles, responsibilities and delegated authorities in relation to communications and social media use may not be clearly defined.
- ✓ Staff may not be trained to use communications and social media appropriately.
- ✓ The effectiveness of key communications may not be evaluated or feedback sought or responded to from stakeholders.

EXECUTIVE SUMMARY

AREAS FOR IMPROVEMENT			
Ref.	Sig.	Finding Summary	Recommendation
1		There is no Digital Communications and Social Media Strategy in place. We recognise that CNPA is currently in the process of developing a strategy, and management intend for this to be approved by the Board in March 2018.	<p>We recommend that the Digital Communications and Social Media Strategy that is in development is completed in a timely manner, and contains the following areas of best practice:</p> <ul style="list-style-type: none"> • Communications and social media strategic aims that contribute to CNPA's strategic aims; • Key measures, such as measurability of Return on Investment (ROI) and ways to evaluate success; • Target demographics, including how they impact social media plans and plans to engage with them; • Clear reason why stakeholders would want to engage with CNPA; • Channel plan for each of the digital platforms; • Analysis of the current situation, through techniques such as PEST, SWOT and industry analysis; • Clear and achievable posting frequency targets; • Budget and resources; and • Plan for campaigns.

Continued overleaf.

EXECUTIVE SUMMARY

AREAS FOR IMPROVEMENT			
Ref.	Sig.	Finding Summary	Recommendation
2		CNPA does not have social media KPIs in place. We note that management intend to develop these and are undergoing an exercise to determine effective KPIs.	<p>We recommend that management implement digital communication and social media related KPIs and that management regularly monitor performance against these. Examples of KPIs could include</p> <ul style="list-style-type: none">• Time taken to respond to queries;• Clicks and downloads of reports and content highlighted via social media; and• Engagement performance.

All our findings and recommendations are set out in the following pages and include those of low significance which have not been summarised above.


DETAILED FINDINGS AND RECOMMENDATIONS

RISK: There may not be a clear communications and social media strategy in place.			
Ref.	Finding	Sig.	Recommendation
1	<p>A clear Digital Communications and Social Media strategy ensures that the focus of an organisation’s social media presence is linked to the achievement of the organisation’s overall strategic aims, with set timescales, plans and objectives clearly defined.</p> <p>There is no Digital Communications and Social Media Strategy in place. We recognise that CNPA is currently in the process of developing a strategy, and management intend for this to be approved by the Board in March 2018.</p> <p>There is a risk that the authority's digital communications and social media activity is not currently being conducted in a focused and targeted manner, to ensure that it is contributing towards the overall organisation's strategic aims.</p>		<p>We recommend that the Digital Communications and Social Media Strategy that is in development is completed in a timely manner, and contains the following areas of best practice:</p> <ul style="list-style-type: none"> • Communications and social media strategic aims that contribute to CNPA’s strategic aims; • Key measures, such as measurability of Return on Investment (ROI) and ways to evaluate success; • Target demographics, including how they impact social media plans and plans to engage with them; • Clear reason why stakeholders would want to engage with CNPA; • Channel plan for each of the digital platforms; • Analysis of the current situation, through techniques such as PEST, SWOT and industry analysis; • Clear and achievable posting frequency targets; • Budget and resources; and • Plan for campaigns.

DETAILED FINDINGS AND RECOMMENDATIONS

MANAGEMENT RESPONSE	RESPONSIBILITY AND IMPLEMENTATION DATE
<p>We agree with this recommendation and will prepare a social media strategy to support our overall Communications & Engagement Strategy by end of March 2018. This will link to our corporate strategic aims, include key performance measures and will be focused on specific audiences to address an identified purpose and audience need.</p>	<p><i>Responsible Officer: Sian Jamieson</i></p> <p><i>Implementation Date: 30th April 2018</i></p>

DETAILED FINDINGS AND RECOMMENDATIONS

RISK: Queries and comments on social media may not be monitored or responded appropriately and in a timely manner.			
Ref.	Finding	Sig.	Recommendation
2	<p>Digital communications and social media KPIs provide a means to effectively measure the performance of an organisation’s social media activity.</p> <p>CNPA does not have social media KPIs in place. We note that management intend to develop these and are undergoing an exercise to determine effective KPIs.</p> <p>There is a risk that performance regarding Social Media and Communications is not effectively monitored.</p>		<p>We recommend that management implement digital communications and social media related KPIs and that regular monitoring and scrutiny against these is provided by management. Examples of KPIs could include</p> <ul style="list-style-type: none"> • Time taken to respond to queries; • Clicks and downloads of reports and content highlighted via social media; and • Engagement performance.
MANAGEMENT RESPONSE		RESPONSIBILITY AND IMPLEMENTATION DATE	
<p>We agree with this recommendation and the social media strategy will include KPIs to measure our social media activity. This will include the overall reach, reach by target demographic/audience as well as the level of engagement achieved. Specific measures will also be set for our campaign activities.</p>		<p><i>Responsible Officer: Sian Jamieson</i></p> <p><i>Implementation Date: 30th April 2018 onwards</i></p>	

DETAILED FINDINGS AND RECOMMENDATIONS

RISK: Policies, procedures, roles, responsibilities and delegated authorities in relation to communications and social media use may not be clearly defined.

Ref.	Finding	Sig.	Recommendation
3	<p>Policies and procedures should be reviewed on a regular basis to ensure that the information contained accurately reflects the process in place.</p> <p>The CNPA Digital Communications Policy states that it is required to be reviewed on an annual basis. However, it has not been formally reviewed since September 2015.</p> <p>There is a risk that communications and social media policies may be outdated.</p>	●	<p>We recommend that CNPA applies version control to policies and procedures and conducts formal reviews on the documents on an annual basis.</p>
MANAGEMENT RESPONSE			RESPONSIBILITY AND IMPLEMENTATION DATE
<p>We agree with this recommendation and the Digital Communications Policy will be reviewed by March 2018 and that a version control will be used to ensure formal reviews are carried out on an annual basis.</p>			<p><i>Responsible Officer: Francoise van Buuren</i></p> <p><i>Implementation Date: 30th April 2018 onwards</i></p>

DETAILED FINDINGS AND RECOMMENDATIONS

RISK: Policies, procedures, roles, responsibilities and delegated authorities in relation to communications and social media use may not be clearly defined.			
Ref.	Finding	Sig.	Recommendation
4	<p>Clearly defined delegated authority levels ensure that communications and social media posts are made and approved appropriately.</p> <p>CNPA has not formally documented its delegated authority levels in relation to all aspects of digital communication and social media activity. We note that monitoring of communications and social media activity is undertaken by the Press Officer and the Digital Campaigns Officer on a daily basis.</p> <p>There is a risk that staff are conducting communication on behalf of the authority or using social media in a manner which is outwith their delegated authority level or roles and responsibility.</p>	●	We recommend that delegated authority levels in relation to Digital Communications and Social Media are clearly defined and documented.
MANAGEMENT RESPONSE			RESPONSIBILITY AND IMPLEMENTATION DATE
<p>We agree with this recommendation and staff who deliver our corporate social media activity will be provided with a clearly defined delegated authority level and specific training and support. All staff and Board members will also receive general guidance and advice on how to deliver their personal social media activities on an annual basis.</p>			<p><i>Responsible Officer: Sian Jamieson</i></p> <p><i>Implementation Date: 30th April 2018 onwards</i></p>

DETAILED FINDINGS AND RECOMMENDATIONS

RISK: The effectiveness of key communications may not be evaluated or feedback sought or responded to from stakeholders.			
Ref.	Finding	Sig.	Recommendation
5	<p>Stakeholder feedback provides useful information on the effectiveness of key communications.</p> <p>CNPA has not obtained feedback from stakeholders on the effectiveness of key digital communications and social media activity.</p> <p>There is a risk that key digital communications and social media activity is not effective, or opportunities to identify potential improvements are not maximised.</p>	●	<p>We recommend that feedback on the effectiveness of key digital communications is sought and responded to from stakeholders.</p> <p>We recommend that the Communications and Engagement team considers conducting a stakeholder survey campaign to gain feedback on the digital platforms and accounts which are currently in use by CNPA.</p> <p>We also recommend that management consider conducting this process prior to the completion of the communications and social media strategy.</p>
MANAGEMENT RESPONSE			RESPONSIBILITY AND IMPLEMENTATION DATE
<p>We agree with this recommendation and will carry out a short survey on our digital communications and social media activity with our stakeholders prior to the completion of the social media strategy.</p>			<p><i>Responsible Officer: Sian Jamieson</i></p> <p><i>Implementation Date: 30th April 2018</i></p>

OBSERVATIONS

Link to Facebook on website homepage

There is an opportunity for the CNPA homepage to contain a link to the Facebook page next to the twitter and LinkedIn links to encourage user access.

Digital communications issues log





There is an opportunity for CNPA to implement an issues log for recording and monitoring misuse of the authority's digital platforms.




APPENDIX I - STAFF INTERVIEWED

NAME	JOB TITLE
Francoise Van Buuren	Head of Communications and Engagement
Sian Jamieson	Digital Campaigns Officer

BDO LLP appreciates the time provided by all the individuals involved in this review and would like to thank them for their assistance and cooperation.

APPENDIX II - DEFINITIONS

LEVEL OF ASSURANCE	DESIGN of internal control framework		OPERATIONAL EFFECTIVENESS of internal controls	
	Findings from review	Design Opinion	Findings from review	Effectiveness Opinion
Substantial 	Appropriate procedures and controls in place to mitigate the key risks.	There is a sound system of internal control designed to achieve system objectives.	No, or only minor, exceptions found in testing of the procedures and controls.	The controls that are in place are being consistently applied.
Moderate 	In the main there are appropriate procedures and controls in place to mitigate the key risks reviewed albeit with some that are not fully effective.	Generally a sound system of internal control designed to achieve system objectives with some exceptions.	A small number of exceptions found in testing of the procedures and controls.	Evidence of non compliance with some controls, that may put some of the system objectives at risk.
Limited 	A number of significant gaps identified in the procedures and controls in key areas. Where practical, efforts should be made to address in-year.	System of internal controls is weakened with system objectives at risk of not being achieved.	A number of reoccurring exceptions found in testing of the procedures and controls. Where practical, efforts should be made to address in-year.	Non-compliance with key procedures and controls places the system objectives at risk.
No 	For all risk areas there are significant gaps in the procedures and controls. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Poor system of internal control.	Due to absence of effective controls and procedures, no reliance can be placed on their operation. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Non compliance and/or compliance with inadequate controls.

Recommendation Significance	
High 	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
Medium 	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
Low 	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

APPENDIX III - TERMS OF REFERENCE

BACKGROUND

It was agreed with management and the Audit Committee within the 2017-18 internal audit plan that Internal Audit would carry out a review of the communications and social media arrangements in place within Cairngorms National Park Authority.


PURPOSE OF REVIEW

The purpose of this review is to provide management and the Audit Committee with assurance that a clear Communications and Social Media strategy is in place, and clear policies, procedures and guidance on communications are provided to relevant staff. We will assess whether communications are made in line with the strategy, policies and procedures, and are effectively reviewed prior to issue. We will also assess whether access to social media accounts is appropriately controlled and whether customer queries are responded to timeously and appropriately.

KEY RISKS

Based upon the risk assessment undertaken, discussions with management, and our collective audit knowledge and understanding the key risks associated with the area under review are:

- There may not be a clear communications and social media strategy in place;
- Policies, procedures, roles, responsibilities and delegated authorities in relation to communications and social media use may not be clearly defined;
- Queries and comments on social media may not be monitored or responded to appropriately and in a timely manner;
- Staff may not be trained to use communications and social media appropriately; and
- The effectiveness of key communications may not be evaluated or feedback sought or responded to from stakeholders.



BDO LLP, a UK limited liability partnership registered in England and Wales under number OC305127, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms. A list of members' names is open to inspection at our registered office, 55 Baker Street, London W1U 7EU. BDO LLP is authorised and regulated by the Financial Conduct Authority to conduct investment business.

BDO is the brand name of the BDO network and for each of the BDO Member Firms.

BDO Northern Ireland, a partnership formed in and under the laws of Northern Ireland, is licensed to operate within the international BDO network of independent member firms.

Copyright ©2018 BDO LLP. All rights reserved.

www.bdo.co.uk

