



Cairngorms National Park Authority

Internal Audit Report

Management Action Follow-up Part 1

2024/25

November 2024



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Introduction and background

Introduction

As part of the internal audit programme we have undertaken a follow up review to provide the Audit & Risk Committee with assurance that management actions agreed in previous internal audit reports have been implemented appropriately. This report summarises the progress made by management in implementing agreed management actions.

Scope

We have reviewed all open management actions and liaised with Cairngorm National Park Authority staff to obtain an update on their implementation progress. This included management identifying actions which were no longer applicable. For recommendations graded priority 3 or above, we request evidence to validate completion of any actions marked for closure by management.

For all actions raised by the prior Internal Auditor (BDO) we have aligned their risk assessments to the Azets risk grading structure (per Appendix 3).

Action for Audit & Risk Committee

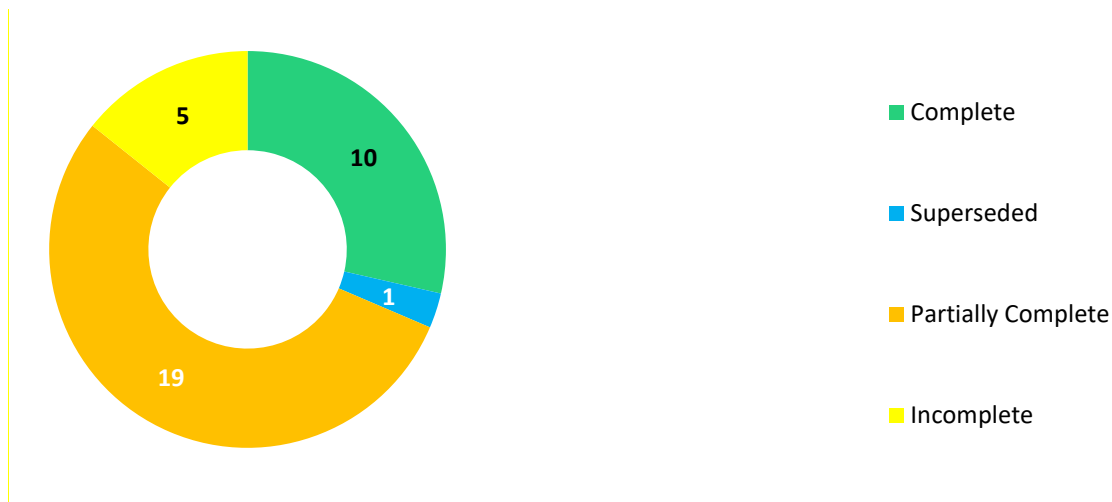
The Committee is asked to note the progress made by management in implementing agreed management actions. The Committee is also asked to consider and approve those actions for which revised timescales have been provided by management (these are detailed at Appendix 2).

Summary of progress

The table below shows the movement in the audit actions in the period from April 2024 to November 2024:

	Number of Actions
Open actions brought forward	28
Actions added to tracker	7
Total actions to follow-up	35
Actions closed	10
Actions Superseded	1
Open actions carried forward	24

Status of Actions as at November 2024



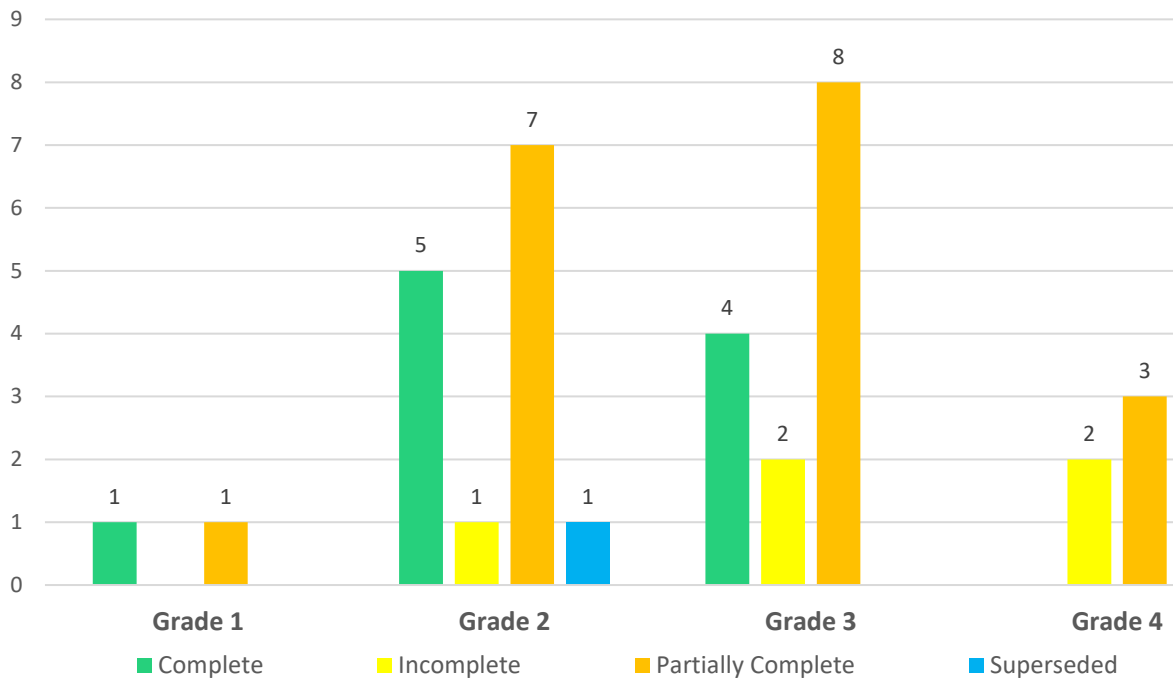
We have confirmed that 10 actions (29%) were completed in the period to November 2024. In addition, one action is recommended for closure as it has been superseded (3%).

19 actions (54%) have been assessed as partially complete and five (14%) are incomplete. Further detail on all outstanding actions is included at Appendix 2.

We recommend that management take a strong focus on clearing aged items in the coming months. We recommend prioritising the most aged items and those that are grade 3 and grade 4. Attention should then be paid to those remaining actions that have passed their original due date and those which will pass their due date for completion over the next period.

A summary of the status of actions by report is shown at Appendix 1.

Status by Grading



Appendix 1: Action status by report

Report title	Complete	Partially complete	Incomplete	Superseded	Total
Grant Funding & Management		1			1
2016/17 sub-total		1			1
Business Continuity Planning			1		1
2018/19 sub-total			1		1
FOISA and EIR Requests		1			1
2019/20 sub-total		1			1
Data Management		1		1	2
2020/21 sub-total		1		1	2
LEADER Programme	1				1
Financial Management and Reporting					
Assurance Mapping of Major Projects		1			1
Cyber Security Review		2			2
ICT Strategy		4			4
Peatland Action Programme Set Up		1			1
2021/22 sub-total	1	8			9
Performance Management	1	1			2
Data Management	1	1			2
Payroll and Expenses	1				1
2022/23 sub-total	3	2			5
Expenditure and Creditors	1	1			2
Risk Management		1			1
Health and Safety	3	1			4
Heritage Horizons	2				2

Report title	Complete	Partially complete	Incomplete	Superseded	Total
Procurement		3	4		7
2023/24 sub- total	6	6	4		16
Grand totals	10	19	5	1	35

Appendix 2: Summary of outstanding actions

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
2016/17 Grant Funding and Management	<p>We recommend that the Grant Toolkit is completed, encompassing all processes in place for the awarding, recording and monitoring of grant funding. The toolkit should also clearly define the following:</p> <ul style="list-style-type: none"> - Actions to be taken when grant conditions are not being met or terms and conditions are breached. - The process for consideration of the risk and value of grant funding applications to determine the proportion of resource required to evaluate these; and - Review and scrutiny arrangements for progress reports provided by grantees. 	Director of Corporate Services	Medium (Grade 2)	Sep-2017	Mar 25	<p>Grant templates have been developed, including an award document and terms & conditions.</p> <p>Appointment of the Procurement Officer provides the opportunity for further advice to colleagues, particularly in respect of distinguishing between grant award and SLA.</p> <p>Grant award paperwork has been collated and reviewed. It has been made available to colleagues on the intranet along with guidance notes.</p> <p>Azets Note: we recommend management and Azets discuss the remaining actions required to complete this action, as this now appears complete.</p>	Partially Complete
2018/19 Business Continuity Planning	<p>We recommend that CNPA develops a testing plan/schedule for BCP which should be reviewed regularly to ensure a strategic approach to testing is developed and implemented. This plan should ensure that varying categories of events are scheduled to be tested on a regular basis based upon</p>	Director of Corporate Services	Medium (Grade 2)	Nov 2019	Mar 25	<p>BCP is in need of update. It is the intention that consultancy will be engaged to develop and embed processes and procedures.</p> <p>Budget allocation has been provided for this in the 2024/25 budget.</p>	Incomplete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	<p>likelihood and overall risk. A formal testing schedule should also be developed for the DRP. We note that the BCP states that testing of the BCP and DRP should be annual, with consideration given to a daily 'tabletop' exercise. However, from discussions with management, it is understood that this is not achievable due to the size of the organisation. Therefore, Management should decide on the most suitable frequency of testing, and this should be detailed within the BCP.</p> <p>In addition, we recommend that the outcomes, lessons learned and required actions are formally documented, and thereafter reflected within the plan for each test.</p>						
2019/20 FOISA and EIR Requests	We recommend CNPA review and update its Publication Scheme. We recommend CNPA reviews all information it holds with an aim to publish as much as possible to ensure transparency and reduce FOI requests.	Information Manager	Low (Grade 1)	Dec 20	Mar 25	Publication scheme will be updated in parallel with the web development project. The current website search facility can be used to find publications of interest. FOI Policy updated April 2024.	Partially Complete
2020/21 Data Management	We recommend that once the Authority have received the feedback from their DPOaaS provider, they create a subject access request procedure, or	Office Services Manager	Medium (Grade 3)	Jun-21	Dec 24	This work is within the remit of Information Manager who is working through policies in parallel with major system developments	Partially Complete

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	<p>document the process within an existing procedure if appropriate. The procedure should outline the following aspects:</p> <ul style="list-style-type: none"> • Roles and responsibilities when responding to requests • Initial steps for acknowledging the request and verifying the identity of the individual • Identifying what data is within scope • How to search for data • How data should be sent to the individual • How requests will be logged and monitored by the Authority 					while making required improvements and developments.	
2021/22 Assurance Mapping of Major Projects	Management should put in place a project plan for implementation of the new project management approach. This may include the use of stage plans to help with maintaining flexibility over how the overall approach develops. In addition, management should ensure that this plan includes appropriate communications to explain any jargon or specific terminology.	Director of Corporate Services	Medium (Grade 2)	Sep-22	Sep 25	We have developed and implemented a new project management and reporting system within the design and development of the C2030 Programme. This is complemented by a move to MS Project and training provided for staff on this system. We will now test these arrangements for suitability for roll out across the organisation as a standardised approach to project management and programme coordination.	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
2021/22 Cyber Security Review	<p>We recommend that CNPA should perform a risk assessment as well as a gap analysis of the current technology, policy and business environment, to identify the key cyber security risks. In conducting that risk assessment and gap analysis, CNPA should refer to recognised leading cyber security frameworks including the Scottish Government Cyber Resilience Framework. We recommend the introduction of a cyber risk register informed by the risk assessment and gap analysis, which includes input from all relevant stakeholders. We recommend that there is a process established for the ongoing identification and management of cyber security risks.</p> <p>We recommend that there is regular formal reporting of the organisation's cyber security posture to appropriate governance groups. This should include information on incidents that have occurred (ideally on a summary or thematic basis to avoid the risk of weaknesses being widely publicised), actions being taken in response to incidents as well as assurance activity</p>	Information Systems Manager	Medium (Grade 3)	Aug-22	Apr 25	<p>While we are mindful of risks as part of the course of our day-to-day management of our IT resources, there has been a lack of formality in recording these risks. We are working to enhance our cyber-security rating and as part of this process we will document these procedures.</p> <p>We are currently taking part in a Scottish Government pilot project that aims to review our security and develop our processes, reporting and governance.</p> <p>We have achieved Cyber Essentials accreditation and are working towards Cyber Essentials Plus.</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	that has taken place, including the results of these.						
2021/22 Cyber Security Review	We recommend that CNPA establish procedures for handling cyber security events. These procedures may take the form of playbooks that specifically detail which actions should be taken in the event of a cyber-attack. We also recommend that following the development of the procedures CNPA should test the procedures to confirm that they enable an effective and efficient response to an event. We also recommend that management regularly reviews its technical cybersecurity posture. This should include ongoing assessment of the adequacy of technical solutions as well as their configuration to ensure that security risk from internal and external threats is minimised.	Information Systems Manager	Medium (Grade 2)	Dec-22	Aug 25	<p>While we are mindful of risks as part of the course of our day-to-day management of our IT resources, there has been a lack of formality in recording these risks. We are working to enhance our cyber-security rating and as part of this process we will document these procedures.</p> <p>We are currently taking part in a Scottish Government pilot project that aims to review our security and develop our processes, reporting and governance.</p> <p>We have achieved Cyber Essentials accreditation and are working towards Cyber Essentials Plus.</p>	Partially Complete
2021/22 ICT Strategy	We recommend that the next development of the IT and Data Strategy includes a financial strategy. This should set out, at a high-level, indicative capital and revenue costs associated with	Director of Corporate Services	Medium (Grade 2)	Sept 23	Dec 25	The Authority's strategic approach to ICT is under consideration. Initial discussions with our colleagues at Loch Lomond and the Trossachs National Park Authority (LL&T) have established a willingness from both	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	achieving expected outcomes from the strategy. This should be allocated for each financial year. This will allow management to make an informed assessment of the financial viability of the strategy and to ensure that financial requirements of the strategy are fed into annual budgeting/spending reviews.					<p>organisations to extend the collaboration already happening; CNPA's strategic aims align with many of those expressed by LL&T. As we continue our conversation, action plans will be developed that include clear timeframes and project milestones to ensure effective delivery.</p> <p>Consideration is being given to a consultancy project towards development and implementation of the IT strategy. We are also in discussion with other NDPBs as part of exploring all options.</p>	
2021/22 ICT Strategy	<p>We recommend that annual operational plans are developed which sets out a workplan for each financial year. This should include core operational tasks associated with maintaining a functioning IT environment as well as improvement and change activities relating to delivering the IT and Data Strategy. Planning in this manner will ensure that there are appropriate financial and human resources available to meet agreed IT and data priorities.</p>	Information Systems Manager and Head of Finance	Medium (Grade 3)	Jun-22	Dec 25	<p>The IT operational plan will, in future, follow naturally from the ICT strategy. While we are developing this strategic direction, operational aims have been set out to provide visibility of the IT team's aims and work scheduling.</p> <p>An operational plan was developed by the team for 2024/25. This plan was used to set individual job plans for the IT team for 2024/25. Personal Development Conversations through the year will contribute to reviewing progress against the operational plan.</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
2021/22 ICT Strategy	We recommend that management explicitly document approvals of strategies within minutes of meetings. We recommend that management establishes formal governance arrangements for the approval of updates to the strategy as well as oversight of delivery. Governance over the IT & Data Strategy should be the responsibility of an existing internal governance group	Director of Corporate Services	Medium (Grade 2)	Mar-23	Dec 25	All strategy and policy documents are presented to both the Senior Management Team (at their fortnightly meetings) and the Board/ its committees. Approval is noted in the minutes of both meetings. The IT strategy will be subject to this governance process	Partially Complete
2021/22 ICT Strategy	We recommend that the action plan within the IT and Data Strategy is updated to include action owners and delivery dates. There should be regular reporting to the SMT on the progress of the completion of actions. We recommend that when the new CNPA Corporate Plan is established a new IT and Data Strategy should be developed aligned with the corporate plan. The Strategy should also be reviewed with the approval of the Strategy by the appropriate oversight group fully documented and included within the document's version control.	Project plan = Information Systems Manager New IT Data Strategy = Director of Corporate Services	Medium (Grade 3)	Project Plan – Jun-22 Data Strategy – Sep-22	Dec 25	The Authority's strategic approach to ICT is under consideration. Initial discussions with our colleagues at Loch Lomond and the Trossachs National Park Authority (LL&T) have established a willingness from both organisations to extend the collaboration already happening; CNPA's strategic aims align with many of those expressed by LL&T. As we continue our conversation, action plans will be developed that include clear timeframes and project milestones to ensure effective delivery. Consideration is being given to a consultancy project towards development and implementation of an updated IT strategy. We are also in discussion with other	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
						NDPBs as part of exploring all options.	
2021/22 Peatland Action Programme Set Up	Management should document the risks associated with the full-service approach and put mitigating controls in place to manage this within the risk appetite/tolerance of the CNPA Board. This should include obtaining legal advice in relation to the potential liabilities related to the full-service provision and award of contracts on behalf of the landowners. Roles and responsibilities of each of the parties subject to the full-service approach should be documented and communicated prior to services being provided. We recommend this is split by each step in the process, e.g. pre-application, application, project management and post project monitoring	Director of Nature and Climate Change	High (Grade 4)	Legal advice – Dec-22 Risk Map and action plan – Dec-22	Mar 25	The SLA developed by our lawyers has been circulated and tested with land managers. This has led to some negative feedback which we need to review prior to finalisation of our approach and on consideration of our risk appetite in this area of work and the potential consequences of our service delivery in this area. Significant work has therefore been undertaken against this recommendation, while final review of feedback prevents this from being marked as complete at this stage.	Partially Complete
2022/23 Data Management	We recommend that CNPA review the current policy suite that is in place and develop and implement policies that address the following policy areas: <ul style="list-style-type: none"> Data Management 	Deputy Chief Executive	Medium (Grade 3)	Dec 23	Apr 25	The Information Manager is working on this as part of his review of policies. The SharePoint transition is ongoing.	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	<ul style="list-style-type: none"> • Data Retention • Information Transfer • Cloud Security • Data Protection • Access Control • Back-up and Resilience • Data Labelling and Information Classification • Acceptable Use • Remote Access <p>We recommend that CNPA introduce a review cycle as standard for all policies, including those not directly related to the migration to SharePoint. The subsequent review and update process should be undertaken annually or in response to any significant changes or events. The configuration of the SharePoint should be aligned to policy documentation, and take into account security and data protection needs, organisational structure requirements, and end-user experience expectations. Once policies have been defined, this should allow the configuration of SharePoint in a manner which fulfils the organisation's requirements and facilitates expected usage and behaviour.</p>						

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
2022/23 Performance Management	We support management's approach to developing a dashboard to support more frequent scrutiny and challenge by senior management. This should be implemented as soon as possible along with an agreed reporting structure, to ensure management receive sufficiently detailed updates in a timely manner.	Governance, Data and Reporting Manager	Medium (Grade 2)	Dec-22	Dec 25	Our work on corporate performance management is ongoing and now incorporates work on Cairngorms 2030 Monitoring and Evaluation. The Annual Report prepared along with the accounts for 2023/24 has established the template for the dashboard referenced in this recommendation, which will be presented to management and board for sign off to the approach on corporate plan monitoring in November 25.	Partially Complete
2023/24 Expenditure and Creditors	CNPA should promote the importance of the standardisation of documentation kept for each purchase, and require that for each commitment of expenditure the following should be documented and maintained: <ul style="list-style-type: none"> • Requisition form - with a different signature for creation and approval. • Invoice - with stamped evidence of receipt of goods/services • Evidence of approval - this could be in the method of an email chain from a member with appropriate authority (as per the delegated levels of authority) 	Finance Manager	Grade 2	Mar-24	Mar 25	<p>The importance of segregation of duties was discussed during staff workshops and is recorded in the DLA policy.</p> <p>We have introducing improved workflows, using M365 functionality and this will improve the completeness of our documentation sets.</p> <p>The move to a new finance system is in progress. This will provide further enhancement of our purchasing and invoice authorisation processes</p>	Partially Complete

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2023/24 Risk Management	Management should implement operational risk registers to ensure that operational risks related to the day-to-day activities of the organisation are recorded and monitored on a regular basis.	Deputy Chief Executive	Grade 3	Dec-23	Mar 25	Risk registers are now in place for IT, Comms and C2030	Partially Complete
2023/24 Health and Safety	We recommend that the Health and Safety Policy and all supporting policies are subject to regular review to ensure that they reflect the current legislative requirements, the health and safety risks currently posed to staff and the range of activities that staff are involved in. In addition management should ensure all policies and procedures include version control and that the Health and Safety Committee monitors progress in this area to ensure appropriate scrutiny and oversight.	Facilities Manager	Grade 3	Apr-24	Mar 25	This is in progress. We are still migrating the H&S Policies onto a SharePoint page and once that is complete the review schedule will be established	Partially Complete
2023/24 Procurement	CNPA should develop a new Procurement Strategy and supporting policies and procedures as soon as possible. CNPA should implement a regular review and update process for strategies and policies related to procurement. This should	Deputy Chief Executive with Head of Finance and Corporate Operations	4	Immediate actions September 24 (with subsequent follow up)	TBC	Procurement strategy now refreshed and approved by ARC. Policies and procedures will be developed from this. The appointment of a Procurement Officer provides additional resource to enhance procurement delivery.	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	<p>involve a review of relevant legislation and guidance, and policies should set out the staged process which should be followed.</p> <p>Once the policies have been updated, CNPA should hold a training session to inform staff of the policy and train them on the processes to follow. The policies should be readily accessible to staff for reflection and to assist them in following the required procedures.</p>						
2023/24 Procurement	<p>CNPA should prepare and publish annual procurement reports, maintain a contract register and produce a procurement expenditure report if it wishes to comply with the organisation's own stated requirements. Otherwise, it should update internal requirements and consider the cost/benefit of departing from good practice as part of such.</p>	Deputy Chief Executive with Head of Finance and Corporate Operations	3	Dec 24	TBC	The procurement strategy has now been updated and agreed, and now sets out any reporting that will be undertaken. Future reporting will be directed by that strategy, with any additional reporting being determined to meet wider communications and transparency aspirations.	Partially Complete
2023/24 Procurement	<p>CNPA should undertake a full review of the procurement documentation held for each supplier. This should include confirming the last date of procurement exercise and determining contracts which require retendering.</p>	Head of Finance	4	September 2024 and onward, according to the agreed action plan.	TBC	<p>Action plan provided to ARC.</p> <p>Support provided by Scotland Excel for larger more complex procurements.</p> <p>Consideration of training needs is underway. Three key staff have attended formal training. Our</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	<p>Management should seek to develop templates which set out the stages of the procurement journey, such as a template for briefing, supplier evaluation and ongoing contract management, in particular for routes 2 and 3 and as a minimum a checklist to be utilised for route 1. There should be clear documentation retained showing the current status of the procurement exercise, and once contractors have been appointed.</p> <p>As part of the work under MAP 1.1, CNPA should revise the current procurement policy to include a step-by-step process flow for the different thresholds, and a detailed explanation of the requirements of each step in the procurement route. This should also contain the required approvals and levels of authority required for each stage to ensure that staff are aware of their roles and responsibilities. This should include the process for non-competitive actions including the documentation to be held and the thresholds in place. There should be a significant focus on training all staff with the updated policies, to ensure</p>					<p>approach to training for the wider organisation is under consideration.</p>	

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	that there is consistent understanding and approaches across the teams. A central repository of all contract information should be maintained.						
2023/24 Procurement	As part of the work under MAP 1.1, CNPA should update both the Procurement Policy and Delegated Levels of Authority documents to include the reviews and approvals required at each stage of the procurement process.	Head of Finance	3	September 2024 onward, according to the agreed action plan.	TBC	Incomplete	Incomplete
2023/24 Procurement	CNPA should set out the levels of authority required for evaluation arrangements. This should include the authority levels which should be involved in the panel evaluation, as well as the process for review and scoring against objectives. The evaluation matrix should be reviewed by a suitably qualified individual, independent of the panel, who will report the final outcome.	Head of Finance	4	September 2024 onward, according to the agreed action plan.	TBC	Incomplete	Incomplete
2023/24 Procurement	CNPA should clearly set out the due diligence steps which should be taken as part of the procurement process, prior to appointment of a contractor. This should be detailed in the revised procurement policy	Head of Finance	3	September 2024 onward, according to the agreed	TBC	Incomplete	Incomplete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update November 2024	Status
	document, and a template should be created for the staff member to complete and retained for evidence. This could be a proportionate approach to the size, scale and complexity of the procurement.			action plan.			
2023/24 Procurement	CNPA should develop procurement performance indicators to allow for progress tracking and identification of issues. These indicators should be monitored regularly and reported upon at relevant governance groups. When issues are identified, these should be reported, and an action log created to track these to resolution. Examples may include: % reduction in time spent on procurement activity, % of all contactors having KPIs in place, development and implementation of a sustainability strategy (these are examples based on CNPA's 2017-2020 Joint Procurement Strategy 'How we will measure what we are doing', management may consider other KPIs to be more appropriate following the Strategy development per MAP 1.1)	Head of Finance	4	Mar 25	N/A	Incomplete	Incomplete

Appendix 3: Audit risk categorisations

Management action grades

4	•Very high risk exposure - major concerns requiring immediate senior attention that create fundamental risks within the organisation.
3	•High risk exposure - absence / failure of key controls that create significant risks within the organisation.
2	•Moderate risk exposure - controls are not working effectively and efficiently and may create moderate risks within the organisation.
1	•Limited risk exposure - controls are working effectively, but could be strengthened to prevent the creation of minor risks or address general house-keeping issues.

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