



# Cairngorms National Park Authority

## Internal Audit Report

### Management Action Follow-up Part 2 2024/25

March 2025



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### Management Action Follow-up Part 2 – 2024/25

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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 This included management identifying actions which were no longer applicable.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

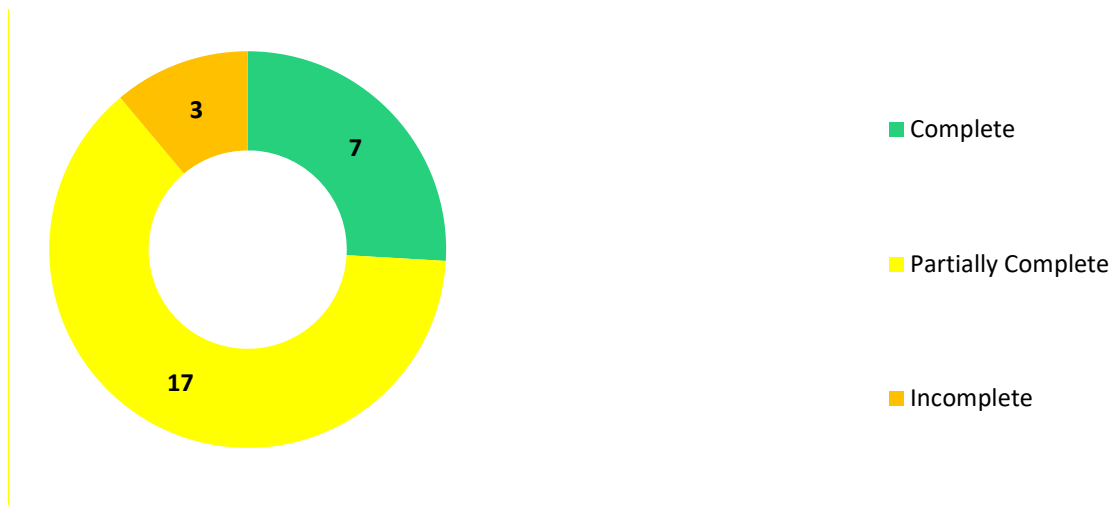
The Committee is asked to note the progress made by management in implementing agreed management actions. The Committee is also asked to consider and approve those actions for which revised timescales have been provided by management (these are detailed at Appendix 2).

# Summary of progress

The table below shows the movement in the audit actions in the period from November 2024 to February 2025:

	Number of Actions
Open actions brought forward	24
Actions added to tracker	3
<b>Total actions to follow-up</b>	<b>27</b>
Actions closed	7
<b>Open actions carried forward</b>	<b>20</b>

## Status of Actions as at March 2025

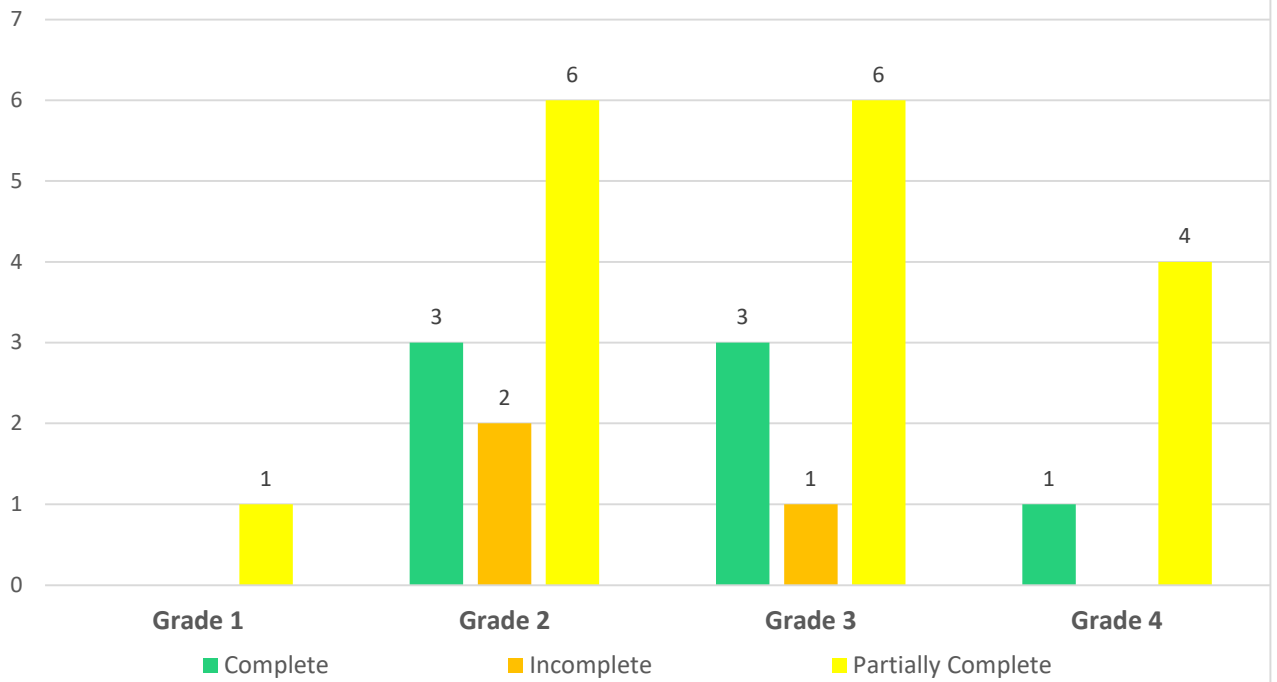


We have confirmed that seven actions (26%) were completed in the period to March 2025. 17 actions (63%) have been assessed as partially complete and three (11%) are incomplete. Further detail on all outstanding actions is included at Appendix 2.

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
<b>2016/17 sub-total</b>		<b>1</b>			<b>1</b>
Business Continuity Planning			1		1
<b>2018/19 sub-total</b>			<b>1</b>		<b>1</b>
FOISA and EIR Requests		1			1
<b>2019/20 sub-total</b>		<b>1</b>			<b>1</b>
Data Management	1				1
<b>2020/21 sub-total</b>	<b>1</b>				<b>1</b>
Assurance Mapping of Major Projects		1			1
Cyber Security Review		2			2
ICT Strategy	2	2			4
Peatland Action Programme Set Up	1				1
<b>2021/22 sub-total</b>	<b>3</b>	<b>3</b>			<b>8</b>
Performance Management		1			1
Data Management		1			1
<b>2022/23 sub-total</b>		<b>2</b>			<b>2</b>
Expenditure and Creditors	1				1
Risk Management	1				1
Health and Safety		1			1
Heritage Horizons					
Procurement		7			7
<b>2023/24 sub- total</b>	<b>2</b>	<b>8</b>			<b>10</b>
Financial and Operational Planning	1	2			3

Report title	Complete	Partially complete	Incomplete	Superseded	Total
2024/25 sub-total	1	2			3
Grand totals	7	17	3		27

## Appendix 2: Summary of outstanding actions

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	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"> <li>- Actions to be taken when grant conditions are not being met or terms and conditions are breached.</li> <li>- The process for consideration of the risk and value of grant funding applications to determine the proportion of resource required to evaluate these; and</li> <li>- Review and scrutiny arrangements for progress reports provided by grantees.</li> </ul>	Director of Corporate Services	Medium (Grade 2)	Sep-2017	Mar 25	<p>We have launched project initiation guidance and are signposting applicants to advice at an early stage in the application process. The consolidation of grant offers through a grant management team.</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 likelihood and overall risk. A</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. The aim is to issue a specification to support development</p>	Incomplete



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	<p>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. 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
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	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	Partially Complete

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	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.					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.	
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.</p> <p>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</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 Plus accreditation.</p>	Partially Complete

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	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 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 Plus accreditation.</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	Status
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 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.	Director of Corporate Services	Medium (Grade 2)	Sept 23	Dec 25	New IT Strategy to be developed	Incomplete
2022/23 Data Management	<p>We recommend that CNPA review the current policy suite that is in place and develop and implement policies that address the following policy areas:</p> <ul style="list-style-type: none"> <li>• Data Management</li> <li>• Data Retention</li> <li>• Information Transfer</li> <li>• Cloud Security</li> <li>• Data Protection</li> <li>• Access Control</li> <li>• Back-up and Resilience</li> <li>• Data Labelling and Information Classification</li> <li>• Acceptable Use</li> <li>• Remote Access</li> </ul> <p>We recommend that CNPA introduce a review cycle as</p>	Deputy Chief Executive	Medium (Grade 3)	Dec 23	Apr 25	We are currently taking part in a Scottish Government pilot project that aims to review our security and develop our processes, reporting and governance.	Partially Complete

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	<p>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>						
2022/23 Performance Management	<p>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.</p>	Governance, Data and Reporting Manager	Medium (Grade 2)	Dec-22	Dec 25	<p>Performance Committee reports on key programmes and projects now adopt a dashboard approach. The presentation of Corporate Plan performance to board also established the dashboard approach to be taken forward into 24/25 reporting which will be further developed prior to presentation to board in September 25.</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	Status
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 involve a review of relevant legislation and guidance, and policies should set out the staged process which should be followed. Once the policies have been updated, CNPA should hold a training session to inform staff	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

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	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.						
2023/24 Procurement	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.	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	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. 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	Head of Finance	4	September 2024 and onward, according to the agreed action plan.	TBC	Action plan provided to ARC.  Support provided by Scotland Excel for larger more complex procurements.  Consideration of training needs is underway. Three key staff have attended formal training. Our approach to training for the wider organisation is under consideration.	Partially Complete

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	<p>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 that there is consistent understanding and approaches across the teams.</p> <p>A central repository of all contract information should be maintained.</p>						



Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	Status
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	Interim control arrangements established through Senior Management Team to heighten scrutiny of procurement plans / procurement journey to be followed for any contracts over £25,000. Supporting documentation is being retained centrally within SharePoint. Formal evaluation template now in use. An approach to the explanation of each step of the procurement route will be rolled out around the organisation once tested.	Partially Complete
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	Interim control arrangements established through Senior Management Team to heighten scrutiny of procurement plans / procurement journey to be followed for any contracts over £25,000. Supporting documentation is being retained centrally within SharePoint. Formal evaluation template now in use.	Partially Complete
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	Interim control arrangements established through Senior Management Team to heighten scrutiny of procurement plans / procurement journey to be followed for any contracts over £25,000. Supporting	Partially Complete

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	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.		documentation is being retained centrally within SharePoint. Formal evaluation template now in use.	
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	Jun 25	Work to develop KPIs ongoing	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	Status
2024/25 Financial and Operational Planning	CNPA should ensure that operational and financial planning process documentation clearly defines the roles and responsibilities of those involved, including timelines for completion and documentation requirements.	Head of Finance and Corporate Operations	2	Mar 25		Work ongoing to update process documentation - define the roles and responsibilities of those involved, provide timelines for completion and set out documentation requirements	Partially Complete
2024/25 Financial and Operational Planning	CNPA should consider developing scenario plans for all future years of the Corporate Plan 2023-27 objectives and reviewing these as part of financial planning processes to ensure continued relevance. This could include utilising key assumptions and adjusting these to account for different scenarios, this may also assist in advancing planning processes and improving the spending cycle.	Head of Finance and Corporate Operations	2	Nov 24		<p>Ongoing Scenario Planning</p> <p>Azets Note: We have reviewed the following reports provided by management:</p> <p>December 2024 budget development 2025/26 paper presented to the Board Business Session and associated meeting notes. This includes detail for the Board on the budget development process for the forthcoming year including the risks considered by management, and the mitigating actions associated with each risk and a comparison of the 2025/26 allocation against the 2024/25 allocation. The paper also provided a working draft detailed budget along with high level comments or assumptions on each line.</p> <p>January 2025 budget development 2025/26 papers presented to the Resources Committee. This included detail on the overall budget position for</p>	Partially Complete

Report / Action	Recommendation	Action Owner	Grade	Original timescale	Revised timescale	Update March 2025	Status
						<p>2025/26 including the impact of key assumptions made in establishing estimates. The report provided an overview of the draft 25/26 budget position, including provision of the actual budget across income, expenditure, running costs and any surplus. The document outlined the budget proposal for 25/26 against the approved 24/25 budget, the movement across years and the associated assumptions made for each line in the budget. This was supplemented by detailed narrative on each of the key areas within the budget. The committee were also provided with the budget risks and proposed mitigating actions.</p> <p>We also confirmed with the Head of Finance and Corporate Operations that CNPA have continued to provide scenario plans to the Scottish Government when requested, including submitting a five-year scenario plan in February 2025. However, there are still ongoing conversations regarding whether scenario plans will be presented to governance committees.</p>	

# 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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