

TITLE OF PAPER: Internal Audit Service – Update Report

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KEY ISSUES

- The attached report includes a status update on progress v plans, a summary of the recommendations registers and a table outlining limited opinions for DETI, Invest NI and NITB.
- Since the last Audit Committee, two final DETI 2013/14 reports have issued (PMS – satisfactory opinion and MATRIX – satisfactory opinion), two final reports (OaCMS – satisfactory opinion and BIA – limited opinion) 2013/14 have issued within Invest NI and one final 2013/14 report has issued (Debt Management Processes - satisfactory) within NITB. A number of further reviews are currently underway or fieldwork complete. Refer to Sections 3, 5 & 7.
- Recommendations registers continue to be updated as and when resources permit. Significant progress has been made in following up recommendations with the number of open recommendations reducing for both DETI and NITB.
- 2 new limited opinions have arisen since the last Audit Committee. Section 11 provides a status update on existing limited opinions within Invest NI and NITB.

DECISIONS REQUIRED

- None

ACTION REQUIRED

- Departmental Audit Committee to note progress v plans, status of recommendations registers and limited opinions.

TIMESCALE

- N/A

Department of Enterprise, Trade and Investment

Internal Audit Service

*Update report to the Departmental Audit Committee
5th March 2014*

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1. INTRODUCTION

1.1 The purpose of this document is to outline the status of the Internal Audit plans for DETI, Invest NI and NITB, to provide an update on the implementation of brought forward Internal Audit recommendations and to outline the status of all limited opinions for DETI, Invest NI and NITB.

2. EXECUTIVE SUMMARY

2.1 Sections 3, 5 and 7 set out the status of the Internal Audit Plans. In relation to DETI (refer to Section 3), 2 final reports and 2 draft reports have issued since the last Departmental Audit Committee and fieldwork is complete/underway or scheduled for most remaining reviews.

2.2 All prior year reports for Invest NI have now issued in final. Two final reports (OaCMS - satisfactory opinion and BIA – limited opinion) and three draft reports have issued in the reporting period and a number of reviews

are at planning/fieldwork ongoing/fieldwork complete stage.

2.3 For NITB (refer to Section 7), one final report has issued in the period and fieldwork is complete/ongoing for a number of reviews. No significant issues have emerged during fieldwork carried out to date.

2.4 A summary of the updated recommendations registers are included at Sections 4, 6 and 8. An age analysis of all outstanding DETI recommendations has also been detailed at Section 4. Overall, DETI is carrying forward 21 recommendations (brought forward balance: 37 recommendations), Invest NI is carrying forward 106 recommendations (brought forward balance: 90 recommendations) and NITB is carrying forward 19 recommendations (brought forward balance: 34 recommendations). Invest NI management have advised that a further 57 recommendations are awaiting follow up and the actual outstanding balance is 49.

2.5 Section 9 of this report sets out all current limited opinions across DETI, Invest NI and NITB and provides an update on limited opinions as reported to the previous Departmental Audit Committee. No new limited opinions have arisen in the period in relation to DETI or NITB. NITB continues to carry one limited opinion in relation to Procurement. The limited opinion previously provided over the NITB Walled City Project report has now been lifted as follow up testing has confirmed that all recommendations in this area have

been fully implemented. In relation to Invest NI, two limited opinion final reports and one draft limited opinion report have issued.

3. DETI: CURRENT STATUS OF INTERNAL AUDIT PLANS

- 3.1 Five reports have now issued in final with satisfactory opinions. A further two reports have issued in draft and fieldwork for most of the remaining reviews is complete/underway or is scheduled.
- 3.2 At the time of writing, there are no issues emerging to be brought to the attention of the Audit Committee.

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
1	Insolvency Central Accounting Unit	<ul style="list-style-type: none"> - Overall management of the Insolvency Account - Accounts payable/receivable - Budgeting / Forecasting - Operating plans - Cash deposits - Submission of Departmental returns 	Scheduled March 2014			
2	Government Procurement Card	<ul style="list-style-type: none"> - Compliance with DAO (DFP) 24/02 – Issue and Use of Payment Cards (inc. credit cards) - Policies and procedures - The issue and re-issue of cards including authorisations - Use & storage of payment cards - Audit trail inc. payment reconciliation process 	Ongoing			

3	Presbyterian Mutual Society	<ul style="list-style-type: none"> - To assess the adequacy and effectiveness of the procedures and processes in place in relation to the oversight and monitoring of the Scheme's Supervisors 	Final report	Satisfactory		
				-	-	-
4	Project Management	<ul style="list-style-type: none"> - Business case/economic appraisals and approvals - Project monitoring & financial reporting - Vouching and approval of expenditure - Interim and post project evaluations - Compliance with National and EU rules & regulations 	Fieldwork complete			
5	NI Science Park (NISP) Connect Programme	<ul style="list-style-type: none"> - To ensure that the management and control systems established over the NISP Connect Programme fully comply with all relevant ERDF rules and regulations. 	Draft report			
6	Government Funders Database	<ul style="list-style-type: none"> - To assess the completeness and accuracy of information recorded on the Government Funders database 	Fieldwork complete			
7	Policy	<ul style="list-style-type: none"> - To assess key parts of the policy cycle in line with the Policy Toolkit and best practice. 	Planning			
8	Legislation	<ul style="list-style-type: none"> - To assess the design and operating effectiveness of procedures and processes in place for the development of legislation (to include Insolvency and TSS) 	Final report	Satisfactory		
				-	-	1

9	Matrix	<ul style="list-style-type: none"> - To assess the design and operating effectiveness of procedures and controls in relation to MATRIX and the implementation of MATRIX recommendations 	Final report	Satisfactory		
				-	-	2
10	Contract Management	<ul style="list-style-type: none"> - Business case/economic appraisals and approvals - Contract monitoring & reporting - Invoicing and approval of expenditure - Interim and post project evaluations 	Fieldwork complete			
11	Freedom of Information	<ul style="list-style-type: none"> - Compliance with relevant legislation - Application of exemptions - Public Interest Tests - Senior management monitoring & review processes 	Final report	Satisfactory		
				-	1	-
12	Risk Management	<ul style="list-style-type: none"> - Risk Management processes & procedures - Risk identification process - Application of criteria to identified risks - Prioritisation of risks - Relationship between objectives and risks - Assignment of ownership of risks - Scenario planning - Review/revision of risk analysis 	Advice & guidance provided on draft Risk Management Policy and Procedures in place of full scope audit	N/A		
13	Stewardship Reporting	<ul style="list-style-type: none"> - Completeness, accuracy and appropriateness of returns completed - Collation of returns and integrity of process 	Fieldwork Complete			
14	Corporate and Operational Planning and Monitoring Performance	<ul style="list-style-type: none"> - Adequacy of policy and procedures in place - Effectiveness of the corporate planning process 	Final report	Satisfactory		
				-	1	-

		<ul style="list-style-type: none"> - Procedures in place ensuring the effective formulation of corporate objectives - Measurability of corporate objectives and allocation of responsibility - Approval and authorisation of the Corporate and Operating Plans - Monitoring and reporting on the achievement of plans and objectives 				
15	Information Management and Governance	<ul style="list-style-type: none"> - Information Security policy & procedures - Roles and responsibilities - ICT systems and accreditation - Progress on implementation of mandatory requirements of the Cabinet Office ‘Security Policy Framework’ (Feb 2011) - Records Management 	Ongoing			
16	Information Security Validation	<ul style="list-style-type: none"> - Validation of Departmental information security returns 	May 2014			
17	External Delivery Organisations – A4E	<ul style="list-style-type: none"> - Compliance with funding agreement and proper use of funds - Information security 	Draft report			
18	Follow up reviews	To assess progress made by management in the implementation of recommendations made during previous Internal Audit reviews.	Ongoing			

4. DETI: RECOMMENDATIONS REGISTER

	Number brought forward	Confirmed as implemented in period	Additional in period	Closing position @ 4 Mar 2014
Priority 1				
Pre 11/12	-	-	-	-
11/12	-	-	-	-
12/13	-	-	-	-
13/14	-	-	-	-
Priority 2				
Pre 11/12	-	-	-	-
11/12	16	(8)	-	8
12/13	7	(2)	-	5
13/14	2	-	-	2
Priority 3				
Pre 11/12	3	(3)	-	0
11/12	6	(4)	-	2
12/13	2	(1)	-	1
13/04	1	-	2	3
TOTAL	37	(18)	2	21

- 37 recommendations have been carried into the reporting period. Two priority 2 recommendations have been added to the register as a result of final reports issuing in the period.
- As a result of follow up work performed, IAS can confirm that a further 18 recommendations (ten priority 2 and eight priority 3) have been implemented.
- A total of 21 recommendations are being carried forward into the next reporting period.
- An age analysis of the 21 recommendations being carried forward reveals that 11 are overdue by more than 6 months (8*P2; 3*P3), two (P2) are overdue between 3 – 6 months and the balance are not yet due/overdue by less than 3 months.
- At present IAS can confirm that eight Priority 2 recommendations overdue by more than 6 months and one Priority 2 recommendation overdue between 3 – 6 months are not implemented. IAS is awaiting confirmation on the remaining aged recommendations before providing a detailed analysis to management.

5. INVEST NI: STATUS OF INTERNAL AUDIT PLANS

5.1 All 2012/13 reports have now issued in final.

5.2 The table below provides an overview of progress against the revised 2013/14 internal audit plan.

5.3 To date, four final reports and four draft reports have issued. Fieldwork for five other reviews is complete/ongoing.

5.4 An overview of limited opinions is provided at Section 9.

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
1	Information Security Mgt Systems (12/13)	To ensure ISMS ha adequate and effective controls that will enable it to continue to attain ISO27001.	Draft report			
2	Business Improvement Agent	To ensure that adequate and effective internal control arrangements have been established over BIA processes.	Final report	Limited		
				1	2	-
3	Interim Management Programme	To ensure that adequate and effective internal control arrangements have been established over IMP processes.	Fieldwork complete			
4	Offers and Claims Management System	To assess the design and operating effectiveness of procedures and controls relating to OaCMS.	Final report	Satisfactory		
				-	-	4
5	Dusseldorf Office	To examine the processes and procedures established in the overseas Office to market and promote Northern Ireland to potential inward investors.	Final report	Satisfactory		
				-	-	8
6	I-Expenses	To assess the design and operating effectiveness of procedures and controls relating to i-expenses.	Draft report			

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
7	General Ledger, Month End Close and Management Accounts	To assess the design and operating effectiveness of procedures and controls relating to input and maintenance of the general ledger, month end close and the production of management accounts.	Final report	Substantial		
				-	-	1
8	Government Procurement Card (GPC)	To ensure that adequate controls and safeguards govern the use of the Government Procurement Card in accordance with relevant DAOs.	Fieldwork ongoing			
9	Jobs Fund	To assess the adequacy and effectiveness of procedures and processes over the Jobs Fund.	Fieldwork complete			
10	Business Information Centres	To assess the adequacy and effectiveness of procedures and processes in place over Business Information Centres.	Draft report			
11	Selective Financial Assistance (SFA)	To assess the adequacy and effectiveness of procedures and processes in place to support growth, investment and employment related projects which increase business productivity.	Fieldwork ongoing			
12	Technology Advisory Unit	To assess the adequacy and effectiveness of procedures and processes in place over Innovation Vouchers and Technology Development Vouchers.	Planning commenced - scheduled March 2014			
13	Grant for Research and Development (R&D)	To assess the adequacy and effectiveness of procedures and processes in place to support the NI business base with R&D activities that will result in new products or improved processes.	Fieldwork ongoing			

14	Accountability Grids	To review the status of outstanding PAC recommendations and assess the status of actions taken to address recommendations.	Scheduled March 2014			
16	Corporate Governance Overview	To assess the adequacy and effectiveness of corporate governance arrangements.	Postponed until 2014/15 at management request			
17	Government Funders Database	To assess the accuracy and completeness of information recorded on the GFD.	Scheduled Feb/March 2014			
18	Local Economic Development (LED)	To assess the adequacy and effectiveness of procedures and controls for the LED programme.	Draft report			
19	Design Advice Service	To assess the adequacy and effectiveness of procedures and processes in place over the Design Advice Service.	Deferred until 2014/15 (April) at management request			
20	Monitoring Performance	To assess the adequacy and effectiveness of procedures and processes in place in relation to performance monitoring	Postponed until 2014/15 at management request			
21	Consultancy	HR Consultancy Account Managed Consultancy End to End Process Consultancy Risk Management	TBA TBA Commenced Complete	N/A		
25	EDO – Inspections and/or Sponsor	<i>Sponsor Control</i> - Contractual arrangements	Ongoing			

	Control Reviews	<ul style="list-style-type: none"> - Corporate Governance arrangements - Monitoring arrangements (to include that of information security) - Funding arrangements <p><i>Inspection</i></p> <ul style="list-style-type: none"> - Corporate Governance (including external audit arrangements) - Financial Controls - Financial Reporting and MIS - Information Management controls (including gathering, storing; handling, using and transmitting information) - Related Parties - Compliance with Funding Agreement - Use of Funds - Management of Public Assets 				
26	Follow-up of outstanding IAS recommendations	To assess progress made by management in the implementation of recommendations made during previous Internal Audit reviews.	Ongoing			

6. INVEST NI: RECOMMENDATIONS REGISTER

	Brought forward	Added	Cleared	Number carried forward	Invest NI position	
					Cleared	Closing
Priority 1						
10/11	-	-	-	-	-	-
11/12	1	-	-	1	(1)	-
12/13	1	2	-	3	(1)	2
13/14	-	1	-	1	-	1
Priority 2						
10/11	-	-	-	-	-	-
11/12	-	-	-	-	-	-
12/13	16	8	-	24	(10)	14
13/14	-	2	-	2	-	2
Priority 3						
10/11	3	-	-	3	(3)	-
11/12	25	-	(5)	20	(13)	7
12/13	35	8	(4)	39	(24)	15
13/14	9	4	-	13	(5)	8
TOTAL	90	25	(9)	106	(57)	49

- A total of 90 recommendations have been carried forward from the last Audit Committee. Five final reports issued in the period adding 25 recommendations (three Priority 1, ten Priority 2 and 12 Priority 3 recommendations) to the register.
- Follow-up testing to date has confirmed implementation of nine recommendations. Invest NI management have identified a further 57 recommendations that they consider implemented. Further IAS follow-up testing is scheduled. The P1 recommendations considered implemented by Invest NI management relate to the SFA and Dubai audits. The remaining P1 recommendations relate to Programme Evaluation (follow-up review is scheduled in March 2014) and BIA (recently finalised report).
- The total number of recommendations being carried forward by IAS is 106. Invest NI management consider the outstanding balance to be 49.

7. NITB: STATUS OF INTERNAL AUDIT PLANS

7.1 Three final reports have issued with satisfactory opinions and fieldwork is complete for two further reviews.

7.2 All other reviews are ongoing or have been scheduled and no significant issues have emerged from current year work to date.

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
1	Income and debtors	<ul style="list-style-type: none"> - Payment processing procedures - PPI – timeliness of payments and management review process - Supplier maintenance and approval processes - Accuracy and validity of payment detailed keyed onto Sage - Sage access controls - Management information and reporting - Adequacy of the audit trail 	Final report	Satisfactory		
				-	-	-
2	Budgetary Control	<ul style="list-style-type: none"> - Payroll authorisations - Review of payroll data e.g. starters, leavers, re-grades, overtime - Supervisory arrangements and segregation of duties - HR interfaces 	Fieldwork complete			
3	Tourism Development Scheme (TDS)	<ul style="list-style-type: none"> - The receipt, evaluation and approval of applications - Eligibility of approved projects - Content of Letters of Offer issued - The adequacy of vouching and payment procedures - Monitoring and evaluation of projects funded 	Fieldwork complete			

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
4	Events	<ul style="list-style-type: none"> - The receipt, evaluation and approval of applications - Eligibility of approved projects - Content of Letters of Offer issued - The adequacy of vouching and payment procedures - Monitoring and evaluation of projects funded 	Final report	Satisfactory		
				-	3	1
5	Procurement	<ul style="list-style-type: none"> - Adequacy and appropriateness of systems and procedures in place - Compliance with relevant procedures and best practice - Adequacy and appropriateness of key tendering and procurement documentation - Utilisation of CPD - Monitoring of supplier performance - Management information and reporting 	Ongoing			
6	Corporate Governance – Statutory Compliance	<ul style="list-style-type: none"> - To assess the design and operating effectiveness of key processes and controls in place to address selected legislative requirements, for example, Health & Safety at Work Act 1974: <ul style="list-style-type: none"> • Policies and procedures • Risk assessments • Training • Incident reporting • Compliance checks 	Final report	Satisfactory		
				-	2	2
7	Risk Management	<ul style="list-style-type: none"> - Risk Management processes & procedures - Risk identification process 	Scheduled March 2014			

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
		<ul style="list-style-type: none"> - Application of criteria to identified risks - Prioritisation of risks - Relationship between objectives and risks - Assignment of ownership of risks - Scenario planning - Review/revision of risk analysis 				
8	Information Management and Governance	<ul style="list-style-type: none"> - Information Security policy & procedures - Roles and responsibilities - ICT systems and accreditation - Progress on implementation of mandatory requirements of the Cabinet Office 'Security Policy Framework' (Feb 2011) 	Scheduled March 2014			
9	External Delivery Organisations – Belfast Visitor and Convention Bureau	<p><i>Sponsor Control</i></p> <ul style="list-style-type: none"> - Contractual arrangements - Corporate Governance arrangements - Monitoring arrangements (to include that of information security) - Funding arrangements <p><i>Inspection</i></p> <ul style="list-style-type: none"> - Corporate Governance (including external audit arrangements) - Financial Controls - Financial Reporting and MIS - Information Management controls (including gathering, storing; handling, using and transmitting information) - Related Parties - Compliance with Funding Agreement - Use of Funds 	TBC Contract recently awarded			

No.	Review	Objective	Status	Opinion		
				P1	P2	P3
		- Management of Public Assets				
10	Follow Up Reviews. All business areas	To assess progress made by management in the implementation of recommendations made during previous Internal Audit reviews.	Ongoing			

8. NITB RECOMMENDATIONS REGISTER

	Number brought forward	Confirmed as implemented in period	Additional in period	Closing position @ 4 Mar 2014
High (Priority 1)				
Pre 2011/12	1	-	-	1
2011/12	3	-	-	3
2012/13	-	(3)	3	-
2013/14	-	-	-	-
Medium (Priority 2)				
Pre 2011/12	-	-	-	-
2011/12	4	(2)	-	2
2012/13	6	-	-	6
2013/14	5	(1)	-	4
Low (Priority 3)				
Pre 2011/12	2	(2)	-	-
2011/12	1	(1)	-	-
2012/13	2	(4)	4	2
2013/14	3	(2)	-	1
Total	27	(15)	7	19

- 27 recommendations have been carried into the reporting period and 7 recommendations added
- The priority 1 recommendations outstanding relate to:
 - NI based staff pay scales which IAS understands remains with DETI/DFP for a decision (1 recommendation); and
 - Procurement (a full audit of Procurement is scheduled Feb/March 2014).
- In the period since the last Audit Committee IAS has also confirmed that three priority 1, three priority 2 and nine priority 3 recommendations have been implemented.

9. LIMITED OPINIONS WITHIN DETI, INVEST NI AND NITB

- 9.1 The table below provides an overview of limited opinions (draft and final) currently issued to the Department, Invest NI and NITB and an update on limited opinions previously reported.
- 9.2 NITB is currently carrying one limited opinion – NITB Procurement. The limited opinion previously provided over the Walled City Signature Project (final report issued October 2013), has since been lifted as a result of follow up testing carried out in February 2014.
- 9.3 Invest NI – two final reports have issued with a limited opinion (Programme Evaluations and Business Improvement Agent) and one draft report has issued with a potential limited opinion (EDO Inspection report on the Engineering Training Council).

No.	IAS ref.	Audit report title	Key issue(s)	Current status	Action
NITB					
1	IA10/NITB/1 1	Procurement	High risk issues relate to: <ul style="list-style-type: none"> Absence of business cases / lack of appraisal or review of long term NITB contracts; Lack of appraisal / evaluation of high value contracts / projects; and Lack of evidence of formal approval for contracts procured by Single Tender Action. 	Management responses received to draft follow up report issued April 2013 and final report issued.	Full Procurement review ongoing.
2	IAS03/NITB/	Walled City	High Risk Issues relate to:	Limited opinion lifted	-

No.	IAS ref.	Audit report title	Key issue(s)	Current status	Action
	12	Signature Project	<ul style="list-style-type: none"> • Memoranda of Understanding (MoU) <ul style="list-style-type: none"> - Testing revealed that for 3 projects, MoUs were still in draft. As a result, this pre-payment condition has not been met in relation to any of these projects - IAS is also concerned about the authenticity of the MoU for The First Derry & Claremont Presbyterian Church and was unable to confirm when the MoU was actually signed • Internal Breach of Procedures <ul style="list-style-type: none"> - IAS testing revealed that a grant payment of £50,400 for St Columb's Cathedral School was made without sufficient supporting documentation that the Project Promoter had paid a third party. Testing also revealed that, on this occasion, the third party did not receive payment from the Project Promoter for the work performed and the Project Promoter went into administration. As a result, an amount of £50,400 could potentially have been claimed fraudulently. 	Follow up fieldwork has been completed and all recommendation have been confirmed as implemented.	

No.	IAS ref.	Audit report title	Key issue(s)	Current status	Action
			<ul style="list-style-type: none"> • Ministerial Approval of the Walled City Lighting Strategy <ul style="list-style-type: none"> - Delegated limits dictate that projects over £1m require DFP and Ministerial Approval. However, IAS testing confirmed that there was no formal documented evidence of Ministerial approval of funding awarded of £1,426,668. IAS does, however, recognise that DFP approval was obtained. 		
Invest Northern Ireland					
3	IA10/INI/12	Programme Evaluation	High risk findings relate to: <ul style="list-style-type: none"> • Risk Potential Assessments not being completed as required for all programmes; and • Evaluations completed without the Evaluation Team's involvement and, as a consequence, not in compliance with the Evaluation Protocol. 	Final Report issued January 2014.	Follow-up for March '14.
4	IA02/INI/13	Business Improvement Agent	High risk finding relates to 30 of the 36 projects being administered under the incorrect state aid notification (SFA rather than de minimis).	Final report issued February 2014.	Urgent retrospective management action being taken. Invest NI management have advised that only 11 of the 30 projects remain outstanding.

No.	IAS ref.	Audit report title	Key issue(s)	Current status	Action
5	EDO Inspection	Engineering Training Council	<p>High risk findings relate to:</p> <ul style="list-style-type: none"> • Management accounts/reports not prepared for review at each Council meeting • No contingency arrangements in place to authorise and process payments as only CEO has access to online banking for this; and • Quarterly reports not prepared and provided to Invest NI since June 2012 <p><i>IAS would highlight that Invest NI has not made any payments to the EDO as a result of the absence of Quarterly reports (3rd bullet above) and the Sponsor Control review in relation to ETC received a satisfactory opinion.</i></p>	Draft report issued January 2014.	Awaiting management response from EDO.

** A limited opinion notification also issued in the period in relation to i-expenses within Invest NI. However, following the receipt of management responses to the draft report and subsequent discussions with management regarding the issues raised, it is likely the report will issue in final with a satisfactory opinion.*

APPENDIX 1 Internal Audit Opinion & Priority Rating Definitions

Opinions

Opinion	Definition
Substantial	There is a robust system of governance, risk management and control which should ensure that objectives are fully achieved.
Satisfactory	Overall there is an adequate and effective system of governance, risk management and control. While there is some residual risk identified, this should not significantly impact on the achievement of objectives. Some improvements are required to enhance the adequacy and / or effectiveness of governance, risk management and control.
Limited	There is an inadequate and/or ineffective system of governance, risk management and control in place. Therefore there is significant risk that the system will fail to meet its objectives. Prompt action is required to improve the adequacy and/or effectiveness of governance, risk management and control.
Unacceptable	The system of governance, risk management and control has failed or there is a real and substantial risk that the system will fail to meet its objectives. Urgent action is required to improve the adequacy and/or effectiveness of governance, risk management and control.

Priority ratings

Risk Grade	Definition
Priority 1	An issue which requires urgent management decision and action without which there is a substantial risk to the achievement of key business/system objectives, to the reputation of the organisation, or to the regularity and propriety of public funds.
Priority 2	An issue which requires prompt attention, as failure to do so could lead to a more serious risk exposure.
Priority 3	Improvements that will enhance the existing control framework and/or represent best practice.