

**The Highland Council**  
**Education, Children and Adult Services Committee**  
**18 May 2016**

Agenda Item	19.
Report No	ECAS 46/16

## Internal Audit Reports

### Report by Director of Care and Learning

#### Summary

This report provides an overview and update in relation to 3 internal audit reports which have been considered by the Audit and Scrutiny Committee:-

- Information Security in Schools
- Family Teams – Management of Staffing Establishment
- Off Site Excursions (follow up)

#### 1. Background

- 1.1 On 24 March, the Audit and Scrutiny Committee considered an Internal Audit Reviews and Progress Report. The 3 internal audits listed above relating to Care and Learning were incorporated within that report.
- 1.2 This report provides members of this Committee with copies of the audit reports attached as **Appendix 1**, and an update on key issues and actions.

#### 2. Information Security in Schools

- 2.1 The audit opinion provided was 'reasonable' assurance, in relation to this audit report.
- 2.2 The purpose of the audit was to ensure:
- (i) Information security governance arrangements, in the form of roles, responsibilities, policies and procedures are in place for schools;
  - (ii) The use of personal information in schools is strictly controlled;
  - (iii) Information is securely disposed of by schools.
- 2.3 Examples of good information security practice were found, though there were 5 key recommendations arising from the report, relating to Data Sharing Registers, Information Security Training, Security of Keys, Use of Email and Access Controls in Schools.
- 2.4 A number of the audit actions have target dates late into 2016 or into 2017, recognising that engagement and agreement with external parties, including NHS Highland and the Schools Management Information System supplier SEEMIS, is required. That work is ongoing. Also, aspects of the actions in relation to access controls will be closely aligned with new school storage arrangements to be implemented as part of the new ICT contract.

2.5 In relation to the more immediate actions, these are in hand, and in relation to information security training for staff, reminders have been issued to staff regarding the Council's online learning module.

### **3. Family Teams – Management of Staffing Establishment**

3.1 The audit opinion provided was 'substantial' assurance, in relation to this audit report.

3.2 The purpose of the audit was to ensure that:

- (i) Efficient and effective processes were in place to enable District Managers to control and monitor staffing levels and ensure they were within the approved staffing establishment for each Family Team. This included processes for controlling and monitoring the use of casual contracts.
- (ii) Staffing levels for Family Teams were within the agreed establishment.
- (iii) Authority to Recruit forms were fully completed and appropriately authorised prior to vacancies being advertised.

3.3 The audit concluded that robust procedures were in place. Two medium priority recommendations were made, in relation to improved monitoring of vacancies, in relation to budget saving targets, and ensuring that 'Authority to Recruit' forms were fully completed. These arrangements are in place, taking account of the audit recommendations, and the Council wide scrutiny arrangements now in place following implementation of the recruitment freeze process.

### **4. Off Site Excursions (follow up)**

4.1 This was a follow up audit, the original audit report having been issued in November 2014. The audit opinion provided was 'limited' assurance in relation to this audit report.

4.2 The purpose of the audit was to ensure that the recommendations made in the previous "HC13/019.bf – School off-site excursions" internal audit report have been implemented and the following objectives can be achieved:

- (i) The policies/ guidance on off-site excursions are adhered to.
- (ii) There are appropriate arrangements for the safe use of minibuses and recharging costs to voluntary organisations.

4.3 The audit concluded by noting that guidance on off-site excursions had been updated and made available to schools, though there remained inconsistent application by schools, particularly in relation to the planning stage. The audit report also noted that revised guidance relating to minibus use had not been concluded by the target date.

4.4 Care and Learning will continue to issue reminders to schools regarding the critical importance of adhering to the off-site excursion guidance. Steps are also being taken to increase the number of school based staff attending the relevant 'EVC' training, and this has now been included as a key performance

indicator in the Service Health and Safety Action Plan.

- 4.5 There has been considerable work undertaken on a new minibus use policy and guidance, with considerable engagement with schools, and the Council's transport unit. That work is now concluding and will see the revised minibus policy concluded summer 2016.

## **5. Implications**

- 5.1 Resources – there are no resource implications to highlight. Any agreed management actions to be progressed will be taken forward within existing resources.
- 5.2 Legal implications – there are no implications to highlight.
- 5.3 Equalities implications – there are no implications to highlight.
- 5.4 Climate Change/Carbon Clever implications – there are no implications to highlight.
- 5.5 Risk implications – the actions agreed and being taken forward will mitigate against the risks highlighted within the internal audit reports.
- 5.6 Gaelic implications - there are no implications to highlight.
- 5.7 Rural implications - there are no implications to highlight.

## **6. Recommendation**

- 6.1 Members are asked to consider this report and note progress in relation to the agreed management action arising from the internal audit reports.

Designation: Director of Care and Learning

Date: 9 May 2016

Author: Brian Porter, Head of Resources

Background Papers:

OFFICIAL



**INTERNAL AUDIT  
FINAL REPORT**

**CARE & LEARNING SERVICE**

**INFORMATION SECURITY IN SCHOOLS**

**AUTHOR**

David Beaton  
Internal Audit  
Finance Service

**DISTRIBUTION**

Director of Care and Learning  
Service Information and Support Manager, C&L (For Info)  
Head of Resources, C&L (For Info)  
Head of Digital Transformation, CD (For Info)  
ICT Operations Manager, CD (For Info)  
Senior Information & Security Officer, CD (For Info)  
Audit Scotland (For Info)

**REF:** HA20/022.bf.bf

**DRAFT DATE: 08/10/15**  
**RE-DRAFT DATE: 02/03/16**  
**FINAL DATE: 14/03/16**

OFFICIAL

OFFICIAL

**Contents**

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2.</b>	<b>REVIEW OBJECTIVES .....</b>	<b>1</b>
<b>3.</b>	<b>SCOPE, METHOD AND COVERAGE .....</b>	<b>1</b>
<b>4.</b>	<b>MAIN FINDINGS .....</b>	<b>2</b>
4.1	INFORMATION SECURITY GOVERNANCE	2
4.2	CONTROL OF PERSONAL INFORMATION IN SCHOOLS	4
4.3	SECURE DISPOSAL OF PAPER BASED INFORMATION IN SCHOOLS	6
<b>5.</b>	<b>CONCLUSION .....</b>	<b>6</b>
<b>6.</b>	<b>AUDIT OPINION .....</b>	<b>6</b>
<b>7.</b>	<b>ACTION PLAN.....</b>	<b>7</b>

OFFICIAL

## OFFICIAL

### 1. INTRODUCTION

The purpose of this report is to record the findings of a recently completed audit review in respect of information security in schools. The review follows on from a review of corporate information security which resulted in a report issued on 18 March 2014. Both reviews examined the staff awareness of the Council's guidance on information security. They also examined physical security arrangements for storing and disposing of paper based information.

### 2. REVIEW OBJECTIVES

The objectives of the review were to ensure:

- (i) Information security governance arrangements, in the form of roles, responsibilities, policies and procedures are in place for schools
- (ii) The use of personal information in schools is strictly controlled
- (iii) Information is securely disposed of by schools.

### 3. SCOPE, METHOD AND COVERAGE

The scope of the review covered physical security in schools where personal information is stored across the Council. There was a specific check of storage of pupil or teacher personal information on computers, electronic media and paper in schools across the Council in order to ensure this complied with best practice standards including:

- The Institute of Internal Auditors Information Systems Auditing Manual
- The information security standards ISO 27001 and ISO 27002.

The audit review was undertaken by sending out a security questionnaire to head teachers for a sample of thirty schools. This was followed up by visits to a sample of three schools to verify the returns. In addition the questionnaire return for a fourth school was discussed with a deputy head teacher from the school.

The questionnaire covered school staff knowledge and understanding on the following topics:

- 1) Council guidance on information security and data sharing guidance in the Highland Practice Model
- 2) Council guidance on data protection
- 3) Storage of paper based personal information including specifically Pupil Profile Records and the Child's Plan.
- 4) Disposal of paper based personal information
- 5) PC and laptop security within the context of the ICT in Learning Strategy
- 6) Password management
- 7) Key security
- 8) Mobile Working within the context of the ICT in Learning Strategy
- 9) Email security
- 10) Information Security Incidents

In addition a sample check of data sharing records will be carried out and the third party Care and Learning Alliance will be contacted to obtain assurance on the security of Child's Plans that are shared by the Council.

## OFFICIAL

### 4. MAIN FINDINGS

The main findings of the review, referenced to the above review objectives, are as follows.

#### 4.1 Information Security Governance

This objective was mainly achieved. The expected controls are that:

- Information Security is controlled by an appropriate governance process
- Staff have been allocated appropriate roles and responsibilities with respect to governance
- School staff are either trained or made fully aware of the Council's guidance on information security, data protection and information sharing.

In accordance with control expectations, the findings were as follows:

- Corporately the Council has a documented Information Security Management System (ISMS) and an Information Security Policy in place. The Information Security Policy details roles and responsibilities for information security management. Information security is overseen by ICT Services and an ICT Security Group. The Group reviews information security risks and incidents and refer any high level issues to the Information Management Governance Board for consideration. The Council's intranet also contains an Information Management Toolkit which includes guidance for staff on securing and sharing information.
- In relation to information security governance for children's information, there is a website entitled 'For Highland's Children' which contains the Highland Practice Model. This Model documents the key components and practices in relation to 'Getting It Right For Every Child' and the Children and Young People's Bill of 2014. The Highland Practice Model identifies when to share information in relation to a child. In addition it links to the 'Information Sharing Procedures' which is guidance for practitioners produced by the Highland Data Sharing Partnership.
- The Information Sharing Procedures include guidance on when data sharing agreements are required. The Council has a corporate Data Sharing Register in place which details all the data sharing agreements which are in place throughout the Council.
- There are two sources of training material in relation to information security and information sharing. The corporate My Online Learning website contains an online information management training course which contains information security and information sharing guidance. In addition there is the training on the Highland Practice Model which is provided by Care and Learning staff and the Children's Services Training team, along with Child Protection advisers. This training also provides guidance on sharing children's information.

However two concerns were also identified which are detailed below.

4.1.1 Reference to the Care & Learning data sharing agreements is contained on the Council's Data Sharing Register. The data sharing agreements, which need to be in place to comply with the Information Commissioner's statutory Data Sharing Code of Practice, referred to are:

- With NHS to protect children and adults and secure multi-agency data exchange
- With the software supplier to facilitate effective service delivery via Phoenix e1

## OFFICIAL

- With the software supplier to facilitate effective service delivery via the SEEMiS System

The data sharing agreement relating to sharing data with the NHS could not be located. However, this may be because the register entry is referring to the Highland Data Sharing Partnership procedures and, if so, this needs to be clarified in the register. In addition data is shared with the third sector organisations, the Care and Learning Alliance and the Action for Children charity, but they are not included in the Highland Data Sharing Partnership.

With regard to the entries for sharing data with Phoenix e1 supplier and SEEMiS supplier, the reference to Phoenix e1 supplier is out of date as the Council no longer uses Phoenix e1. For SEEMiS, the data sharing agreement corresponding to the entry could not be found. In fact a data processing agreement should be in place and not a data sharing agreement. It should form part of the license and support agreement with the SEEMiS Limited Liability Partnership (a partnership between the 32 Scottish councils).

In addition to the above entries it was identified that Care & Learning share information with a number of external bodies in the third sector including the Care and Learning Alliance (CALA) charity. Data sharing agreements are not in place for these bodies.

### 4.1.2 The number of teachers who have completed the training are as follows:

- 45 teaching staff have completed the corporate My Online Learning Information Management training which contains guidance on information security and information sharing
- 4352 teaching staff have completed 'An Introduction to the Highland Practice Model' training
- 355 teaching staff have completed the 'Understanding the Highland Practice Model' training

Therefore a substantial number of teaching staff have completed training relating to the Highland Practice Model which includes guidance on sharing children's information, but few teaching staff have completed the corporate information management training which contains guidance on information security.

There is data sharing guidance on the My Online Learning (MOL) website and the data sharing guidance in the Information Management Toolkit (IMT) website, but neither of these websites refers to the Highland Practice Model which is the Highland Data Sharing Partnership's data sharing model. The Highland Practice Model is held on the For Highlands Children website. Hence there is a disconnect here between three websites in that the MOL and IMT websites should be referring specifically to the Highland Practice Model. In addition some of the links in the IMT website are not working and the sharing flowchart is not the same as the Highland Practice Model website.

Both the questionnaire responses and school visits highlighted that some school staff were not aware of basic information security guidance such as:

- How to lock a PC or laptop quickly using the Windows and L keys
- How to manage their passwords securely
- The importance of encryption and the protection it provides both to personal data and the teachers who use it
- How to report an information security incident.

In addition teaching staff requested data protection guidance in the form of examples of types of personal information which, if lost or stolen, would incur a substantial Information Commissioner's Office (ICO) fine.



#### 4.2 Control of Personal Information in Schools

This objective was partially achieved. The expected controls are that:

- Paper based personal information is stored securely in locked cabinets or cupboards
- PC and laptops are always screen locked when not in use
- School staff keep their passwords secure and do not disclose them
- Keys for cabinets containing confidential personal pupil and teacher information are either taken home or kept in locked key cabinets
- School staff who work from home are provided a secure method of doing so, e.g. by using encrypted memory sticks
- School staff members are aware the internet email is not regarded as secure by the Information Commissioner's Office and should not send personal pupil information via it without the parent's consent.
- School staff are fully aware of existing data sharing agreements and how to share pupil data with other agencies such as the NHS
- School staff know to report information security incidents to the Fujitsu helpdesk
- Paper based personal information is disposed of securely either by shredding or via an approved confidential waste company.

Although most teachers have not completed the online information security training and there is evidence that some staff are not aware of basic information security guidance, there is also evidence that other staff had learned good practice from the information security guidance provided in both corporate newsletters and schools ICT newsletters. These staff said they:

- Store their confidential paper based pupil information in locked cabinets and some evidence to support this was found during the school visits
- Use key cabinets are used to store keys
- Know to avoid using unprotected internet email to send personal pupil information to parents.

However the above good practice is not in place across all schools and five concerns were identified below.

- 4.2.1 The school visits revealed that secure key cabinets are not in use throughout schools. Instead some keys for cabinets are held in either locked or unlocked desk drawers. This means pupil records in cabinets could potentially be accessed by unauthorised Council cleaning and janitorial staff. In addition staff employed by third parties in PPP schools to provide facilities management services could also potentially obtain unauthorised access. Furthermore these staff members have access to all the rooms in a school for security, cleaning and fire safety purposes.

The Responsible Premises Officers handbook states:

*"Keys should never be left in locks. Keys should be stored securely in locked cabinets, e.g. key cabinets, if they are to be left in the building overnight. Whenever possible, keys should be numbered and strictly controlled. All staff members who are designated as "key-holders" must return keys at end of their employment or when there are changes in responsibilities."*

- 4.2.2 Currently all refreshed school PCs and laptops are encrypted. In addition teachers have been supplied with an encrypted pen drive to take work home. Although concerns were raised during the review relating to the use of the remaining

## OFFICIAL

unencrypted legacy PCs and problems relating to the use of encrypted pen drives, the Director of Care and Learning has advised that the 'ICT in Learning Strategy' is that all teachers will be supplied with encrypted equipment in future. This means the concerns raised will be eliminated.

- 4.2.3 School staff members and parents use email to correspond with each other. This is often for non-confidential matters such as events taking place at the school. On occasions these emails can contain confidential personal, or sensitive personal, information about a pupil. However schools do not always alert parents to the insecurity of internet email or obtain their explicit consent to continue correspondence in this way. This is not in accordance with the Council's Acceptable Use Policy which states:

*"If a member of the public requests their personal data to be emailed to them, then this can be done if they are fully aware of the risk and confirm that they want to accept that risk. If this involves sensitive personal data then this permission must be in writing and retained as a Council Record."*

The ICO also recommends consent from the public must be obtained and it includes a warning in its emails when it corresponds with the public in this way. A solution to this concern, suggested by the Head of Additional Support Services, would be to include a notice in school emails of this nature to parents stating:

*"Communication by internet email is not secure as messages can be intercepted and read by someone else. Therefore we strongly advise you not to email any information, which if disclosed to unrelated third parties would be likely to cause you distress. If you want us to respond by email you must realise that there can be no guarantee of privacy. If you would prefer that we communicate with you in a more secure way please provide a postal address."*

- 4.2.4 Schools use shared network drive folders to store a variety of information for teachers, some of which is confidential in nature. In accordance with best practice the access to these folders should be reviewed at least annually by senior school staff, but they are not. This situation does not comply with ICT Services ICT User and Network Access Control Policy which states:

*"User access rights must be reviewed annually by the Information Asset Owner and should include the revalidation of user access rights granted to users"*.

Senior school staff cannot readily check who has access to these folders as this is controlled by Fujitsu. To carry out the check they would have to log a request to Fujitsu to provide a list of users who have access. If school staff stored their information on SharePoint, an access review of this nature would be easier and more efficient. The Director of Care & Learning wants schools to use SharePoint and a business case to use it to share information between schools and Care & Learning management was initially rejected by the ICT Partnership Board on 27 August 2013. The Board instead requested a more detailed report to be submitted after discussions had taken place with ICT. After this decision ECS staff decided to use GLOW to share information instead of SharePoint. However the Director of Care & Learning no longer considers GLOW to be suitable.

The Senior Information and Security Officer stated the Corporate Improvement Programme Board / Transformational Savings Board, which is funding for the rollout of SharePoint, made it clear that schools are out of scope at this stage. However, he also suggested a pilot could be considered for a couple of schools to test the access control in preparation for a future roll out at some stage.

## OFFICIAL

### 4.3 Secure Disposal of Paper Based Information in Schools

This objective was achieved. Schools reported that confidential paper based information is disposed of securely in two ways. Confidential paper waste is either shredded within the school or stored in secure confidential waste bins and subsequently disposed of by confidential waste providers. The schools site visits found no evidence to contradict this.

### 5. CONCLUSION

Although examples of good information security practice were found throughout the review, improvements are still required. The Council has a Data Sharing Register but it needs updated. Teaching staff have completed training relating to the Highland Practice Model which includes guidance on sharing children's information and they have a basic understanding of information security. Most know to lock away paper based personal pupil information and keep their usernames and passwords secure. However the completion of the Council's online information security training by teachers is very low. In addition there needs to be an increase in the use of key cabinets throughout schools and better control of keys to ensure unauthorised staff or visitors cannot access paper based personal pupil information. Additional guidance needs to be issued to Head Teachers on the use of internet email when the protective marking scheme is implemented across the Council.

There are five recommendations in this report all of which are classified as medium priority. They are all due to implemented by the end of December 2017.

### 6. AUDIT OPINION

The opinion is based upon, and limited to, the work performed in respect of the subject under review. Internal Audit cannot provide total assurance that control weaknesses or irregularities do not exist. It is the opinion that **Reasonable Assurance** can be given in that whilst the system is broadly reliable, areas of weakness have been identified which put some of the system objectives at risk, and/ or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk. The levels of assurance and their definitions can be found at Appendix 1.

OFFICIAL

**7. ACTION PLAN**

The Action Plan contains 5 recommendations as follows:

**Description**

Major issues that managers need to address as a matter of urgency.

Important issues that managers should address and will benefit the Organisation if implemented.

Minor issues that are not critical but managers should address.

**Total recommendations**

Priority	Number
High	0
Medium	5
Low	0
	<b>5</b>

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
4.1.1	Medium	<p><b>Data Sharing Registers</b></p> <p>1) The data sharing agreement referred to on the Council's Data Sharing Register with the NHS was not provided for review as it could not be found.</p>	<p>1) The reference to the data sharing agreement with the NHS referred to in the Council's Data Sharing Register should be found to ensure it exists, is complete and up to date. If the reference is not to a specific agreement but to the procedures detailed in the Highland Practice Model, then the entry should be updated to clarify this.</p>	<p>1) The Chief Executive of NHS Highland and the Chief Executive of Highland Council have met to review their electronic data exchange arrangements. As part of this process NHS Highland has agreed to review what is on the two data sharing registers with a view to making any required updates or corrections.</p>	Director of Care and Learning	31/12/16
		<p>2) The data sharing agreement with the Phoenix e1 supplier is out of date.</p>	<p>2) The reference to the Phoenix e1 supplier should be removed.</p>	<p>2) The Data Sharing Register to be updated</p>	Service Information and Support Manager	30/04/16
		<p>3) There should be a data processing agreement in place with SEEMiS as opposed to a data sharing agreement.</p>	<p>3) The Council should work with the other 31 Scottish councils to ensure a data processing agreement with the SEEMiS supplier is produced if one</p>	<p>3) Agreed. Enquiries about a data processing agreement will be made through our representation on the</p>	Head of Resources	30/06/16

OFFICIAL

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
		4) There are no data sharing agreements in place for sharing data with the third sector organisations such as the Care and Learning Alliance charity.	4) Consideration should be given to producing data sharing agreements with all external bodies that Care & Learning share information with on a regular basis. It may not be practical to do this for all the smaller agencies, but information could be provided about Care & Learning expectations for the safekeeping of data via a covering note.	SEEMIS board. 4) The membership of the Highland Data Sharing Partnership referred to in the Highland Practice Model will be reviewed to consider the inclusion of voluntary sector organisations such as CALA.	Senior Manager - Early Years	31/01/17
4.1.2	Medium	<b>Information Security Training</b> 1) Although 4352 teaching staff have completed 'An Introduction to the Highland Practice Model' training, Employee Development has advised that less than two percent of teaching staff have carried out the My Online Learning training on information security. Head teachers commented that they would like reports from Employee Development on how many staff in their school had carried out information security training. Teaching staff commented during the review that some face to face information security training in addition to the My Online Learning training would increase its impact.	1) The delivery of information security training to school staff should be reviewed to provide assurance that teachers are completing the information security training. It should consider: <ul style="list-style-type: none"> <li>• How the completion of the training is monitored and reported</li> <li>• A 'train the trainer' to support the e-learning package.</li> </ul>	1) Will be managed through on-going revision of training and promotion of My Online Learning training.	Service Information and Support Manager	31/01/17

OFFICIAL

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION RESPONSIBLE OFFICER	TARGET DATE
		<p>Both the questionnaire responses and school visits highlighted that some staff were not aware of basic information security guidance.</p> <p>2) There is data sharing guidance on the My Online Learning (MOL) website and the data sharing guidance in the Information Management Toolkit (IMT) website, but neither of these websites refer to the Highland Practice Model which is the Highland Data Sharing Partnership's data sharing model. The Highland Practice Model is held on the For Highlands Children website. Hence there is a disconnect here between three websites in that the MOL and IMT websites should be referring specifically to the Highland Practice Model. In addition some of the links in the IMT website are not working and the sharing flowchart is not the same as the Highland Practice Model website</p>	<p>2) The My Online Learning (MOL) website and the data sharing guidance in the Information Management Toolkit (IMT) website should be updated to refer to the Highland Practice Model which is the Highland Data Sharing Partnership's data sharing model.</p>	<p>2) Will be managed through on-going revision of training and a new Information Management project.</p>	<p>Service Information and Support Manager</p>	<p>31/01/17</p>
4.2.1	Medium	<p><b>Key Security</b> Keys for cabinets containing confidential personal pupil information are held in unlocked desks in locked rooms. In addition pupil records in cabinets are accessible by facilities management staff, janitors and cleaners.</p>	<p>The storage of school room keys which janitors, facilities managers and cleaners may hold versus keys for cabinets holding pupil records, which only teachers and school office staff should hold, needs to be reviewed.</p>	<p>Instruction and guidance issued to schools to review key security arrangements.</p>	<p>Head of Resources</p>	<p>30/06/16</p>

OFFICIAL

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
4.2.3	Medium	<p><b>Use of Email</b> Schools do not always alert parents to the insecurity of internet email or obtain their consent to continue correspondence when personal pupil information is included in the email. This is not in accordance with the Council's Acceptable Use Policy and not in accordance with ICO advice.</p>	<p>Schools should be reminded of inclusion of the Acceptable Use Policy guidance with regard to email and obtaining consent when personal pupil information is included in the email. In addition a standard warning regarding the insecurity of internet email should be included in emails of this nature.</p>	<p>One of the biggest email risks is sending emails to the wrong person by mistake. When the protective marking solution is live across the Council, new guidance will be provided to Head Teachers on the use of the information classifications for official-sensitive and official-sensitive-personal documents including emails. The inclusion of a standard warning regarding the insecurity of internet email will also be discussed with ICT Services as part of the deployment of the protective marking solution.</p>	Head Resources	30/06/16
4.2.4	Medium	<p><b>Access Control in Schools</b> Schools do not review user access to their shared network folders in compliance with the ICT User and Network Access Control Policy. This is because it is not an easy and efficient process.</p>	<p>A pilot of SharePoint should be considered in two schools to test access control in this environment.</p>	<p>Will be managed through a new Information Management project.</p>	Service Information and Support Manager	31/12/17

**Internal Audit Opinion**

<b>Level</b>	<b>Definition</b>
<b>Full Assurance</b>	There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.
<b>Substantial Assurance</b>	While there is generally a sound system, there are minor areas of weakness which put some of the system objectives at risk, and/ or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
<b>Reasonable Assurance</b>	Whilst the system is broadly reliable, areas of weakness have been identified which put some of the system objectives at risk, and/ or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
<b>Limited Assurance</b>	Weaknesses in the system of controls are such as to put the system objectives at risk, and/ or the level of non-compliance puts the system objectives at risk.
<b>No Assurance</b>	Control is generally weak, leaving the system open to significant error or abuse, and/ or significant non-compliance with basic controls leaves the system open to error or abuse.



**INTERNAL AUDIT  
FINAL REPORT**

**CARE & LEARNING SERVICE**

**FAMILY TEAMS - MANAGEMENT OF STAFFING ESTABLISHMENT**

**AUTHOR**

John Campbell  
Internal Audit  
Finance Service

**DISTRIBUTION**

Director of Care & Learning  
Head of Children's Services, Care & Learning  
Area Care & Learning Managers (x3)  
Children's Services Manager (x4), Care & Learning  
District Manager (x10), Care & Learning  
Finance Manager (Care & Learning), Finance Service  
Audit Scotland

**REF: HAA02/001**

**DRAFT DATE:**

22/12/15

**FINAL DATE:**

06/01/16

**Contents**

<b>1. INTRODUCTION.....</b>	<b>1</b>
<b>2. REVIEW OBJECTIVES.....</b>	<b>1</b>
<b>3. SCOPE, METHOD &amp; COVERAGE.....</b>	<b>1</b>
<b>4. MAIN FINDINGS.....</b>	<b>1</b>
4.1 MONITORING OF STAFFING ESTABLISHMENT	1
4.2 VERIFICATION THAT STAFFING LEVELS WERE WITHIN THE AGREED STAFFING ESTABLISHMENT	2
4.3 COMPLETION OF AUTHORITY TO RECRUIT (ATR) FORMS	2
<b>5. CONCLUSION.....</b>	<b>3</b>
<b>6. AUDIT OPINION.....</b>	<b>3</b>
<b>7. ACTION PLAN.....</b>	<b>4</b>

## **1. INTRODUCTION**

Family Teams were established during 2014 to deliver universal and additional public health services, as well as social care and child protection services for children and families.

There are 10 Family Teams, managed by a District Manager with support from Practice Leads in each of the 3 specialisms covered by Family Teams:

- Universal Services and Early Intervention in Early Years;
- Universal Services and Early Intervention in School Age Children;
- Care and Protection.

Family Teams have an overall budget of £16.344m for the 2015/16 financial year.

## **2. REVIEW OBJECTIVES**

The objectives of the review were to ensure that:

- (i) Efficient and effective processes were in place to enable District Managers to control and monitor staffing levels and ensure they were within the approved staffing establishment for each Family Team. This included processes for controlling and monitoring the use of casual contracts.
- (ii) Staffing levels for Family Teams were within the agreed establishment.
- (iii) Authority to Recruit forms were fully completed and appropriately authorised prior to vacancies being advertised.

## **3. SCOPE, METHOD & COVERAGE**

The audit looked at the processes used by District Managers to ensure that Family Teams remain within their agreed staffing establishment. It also looked to verify that current staffing levels are within the staffing establishment for each Family Team. The scope of the audit was discussed and agreed with the Head of Children's Services. In the 2014/15 financial year around 90% of the overall budget for Family Teams related to staffing costs.

## **4. MAIN FINDINGS**

The main findings of the review, referenced to the above review objectives, are as follows:

### **4.1 Monitoring of staffing establishment**

- 4.1.1 This objective was fully achieved. Each Team has a monthly budget monitoring meeting between the District Manager and Practice Leads. As part of the meeting the staffing position is reviewed to ensure that the Team's budgets are only charged for those staff within the Team. Updates are provided on vacant posts, including any measures taken to cover vacancies e.g. use of agency/bank staff. There are also bi-monthly meetings with the District Managers for each Area and the Accountant from the Service Finance Team in which the staffing position is reviewed along with monitoring of other budgets. These processes ensure that staffing levels are regularly monitored and enable action to be taken at an early stage if any issues are identified. Posts where vacancies are covered by the use of casual or agency/bank staff are recorded on the Service Accountant's spreadsheet during the monitoring meeting, and costs incurred from these posts are also monitored as part of the meeting.

## **4.2 Verification that staffing levels were within the agreed staffing establishment**

4.2.1 This objective was substantially achieved as the staffing position for the majority of teams is within the agreed establishment. The staffing position reported for the Inverness Central, Badenoch & Strathspey, Inverness West, Mid Ross, Easter Ross and Lochaber teams all corresponded with the approved staffing establishment.

While the position for the remaining teams initially appeared to differ from the approved establishment, further enquiry with the relevant District Manager identified explanations for the apparent discrepancy. In some cases (Caithness, Skye & Wester Ross) the wrong figure was initially provided by the District Manager. For the remaining teams the differences resulted from variations in the FTE for some posts to cover vacancies in similar posts, or from temporary variations to working hours for a particular member of staff.

Following the regular budget monitoring meetings the Service Accountant provides an updated spreadsheet showing the staffing position for each Family Team to the Head of Children's Services. She also provides notification of any changes to the staffing establishment identified during the monitoring meetings.

It was noted that the responses from District Managers to a questionnaire issued by Internal Audit to establish the process to monitor staffing levels referred to regular vacancies within Family Teams. While this has ensured that the agreed establishment has not been exceeded, it also creates a risk that the Family Team may not be able to deliver services as effectively as intended due to the level of vacancies. It should be noted that the underspend resulting from the vacancies in Family Teams is highlighted to Members in revenue budget monitoring reports presented to the Education, Children & Adult Services Committee.

The level of vacancies has also created a situation where vacancy savings targets have been achieved by natural turnover of staff. There is a risk that if more challenging targets are introduced in future years they will not be achieved solely by natural turnover. Therefore it is important that District Managers formally monitor progress against vacancy savings targets for their teams. The regular meetings with the Service Accountant would provide a suitable forum to review progress against vacancy savings targets.

## **4.3 Completion of Authority to Recruit (ATR) forms**

4.3.1 This objective was substantially achieved as Authority to Recruit forms were completed and appropriately authorised prior to vacancies being advertised. Each of the 26 vacancies reviewed had a completed ATR form, which had been approved by an appropriate Senior Officer. However, the undernoted instances were identified where the ATR form was not fully completed, despite the need for the relevant sections to be completed being clearly recorded on the ATR form:

- 2 forms, both for the Mid Ross Team, did not record the reasons why the post required to be filled or why the vacancy required to be advertised externally.
- 2 forms, 1 for Inverness Central, Badenoch & Strathspey and 1 for Lochaber, did not record the reason why the posts required to be advertised externally.
- 1 form for the Sutherland Team had the reason for vacancy recorded as "other". An explanation was provided for the reason the post needed to be filled, but the ATR did not clearly state that the post was an amalgamation of Children's Services Worker & Early Years Practitioner vacancies and therefore did not fully detail the background to the post for the officer authorising the ATR form.

The Head of Children's Services stated that if she was authorising an ATR form where the reason for filling the vacancy was not clear she would request further details by e-mail/telephone.

**5. CONCLUSION**

Robust procedures were in place to monitor staffing levels, and it was verified that Family Teams did not exceed their approved staffing establishment. Processes could be further improved by ensuring Authority to Recruit forms are fully completed when vacancies were being filled, and by including monitoring of progress against vacancy savings targets in the monitoring meetings that already take place. There are 2 recommendations arising from the audit, both of which are classified as medium priority. Both recommendations have been accepted by management, and are due to be implemented by 31/03/16.

**6. AUDIT OPINION**

The opinion is based upon, and limited to, the work performed in respect of the subject under review. Internal Audit cannot provide total assurance that control weaknesses or irregularities do not exist. It is the opinion that **Substantial Assurance** can be given in that while there is generally a sound system, there are areas of weakness which put some of the system objectives at risk, and/ or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.

## 7. ACTION PLAN

The Action Plan contains 2 recommendations as follows:

Description	Priority	Number
Major issues that managers need to address as a matter of urgency.	High	0
Important issues that managers should address and will benefit the Organisation if implemented.	Medium	2
Minor issues that are not critical but managers should address.	Low	0
<b>Total recommendations</b>		<b>2</b>

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
4.2.1	Medium	While Family Teams are currently achieving vacancy saving targets, there is a risk that more challenging targets would not be achieved without a formal monitoring process.	Progress on vacancy savings targets should be included as part of the budget monitoring meetings held with the Service Accountant.	Head of Service to check periodically that this is being maintained and the process to be highlighted if more challenging targets are set.	Head of Children's Services.	31/03/16
4.3.1	Medium	5 of the 26 ATR forms checked were not fully completed. As a result the authorising officer has to request further details before authorising the ATR.	ATR forms should be fully completed to provide a full audit trail and ensure that the authorising officer has all relevant information when authorising the form.	All authorisers of ATRs to query any gaps in completion before authorisation.	Head of Children's Services and Care Learning Managers.	Ongoing.

**INTERNAL AUDIT  
FINAL REPORT**

CARE AND LEARNING SERVICE

SCHOOL OFF-SITE EXCURSIONS (FOLLOW-UP)

**AUTHOR**

Yvonne Holmes  
Internal Audit  
Finance Service

**DISTRIBUTION**

Director of Care and Learning  
Director of Community Services  
Head of Resources, Care and Learning Service  
Principal Transport Officer, Community Services  
Outdoor Activities Manager, High Life Highland  
Audit Scotland

**REF: HAB01/005**

**DRAFT DATE: 30/10/15  
FINAL DATE: 08/12/15**

## Contents

<b>1. INTRODUCTION.....</b>	<b>1</b>
<b>2. REVIEW OBJECTIVES.....</b>	<b>1</b>
<b>3. SCOPE, METHOD &amp; COVERAGE.....</b>	<b>1</b>
<b>4. MAIN FINDINGS.....</b>	<b>1</b>
4.1 POLICIES AND GUIDANCE ARE ADHERED TO	1
4.2 SAFE USE AND RECHARGING OF MINIBUSES	3
<b>5. CONCLUSION.....</b>	<b>4</b>
<b>6. AUDIT OPINION .....</b>	<b>5</b>
<b>7. ACTION PLAN .....</b>	<b>6</b>



## 1. INTRODUCTION

This audit was undertaken as part of the 2015/16 audit plan and records the findings of a recently completed follow-up audit in respect of school off-site excursions.

The original audit report was issued on 04/11/14 and had the audit opinion of "Limited Assurance". The report contained a total of 4 recommendations which were classified as follows: 1 high, 2 medium and 1 low grade. All recommendations were due for completion by 31/03/15. Due to the audit opinion, it was decided that a follow-up audit should be undertaken.

As part of the Curriculum for Excellence through Outdoor Learning, High Life Highland works with school staff to build their capacity to deliver off-site excursions. As such they are responsible for the safety management systems that underpin off-site excursions and therefore take the lead on developing related policy and guidance in this area.

## 2. REVIEW OBJECTIVES

To ensure that the recommendations made in the previous "HC13/019.bf – School off-site excursions" internal audit report have been implemented and the following objectives can be achieved:

- (i) The policies/ guidance on off-site excursions are adhered to.
- (ii) There are appropriate arrangements for the safe use of minibuses and recharging costs to voluntary organisations.

## 3. SCOPE, METHOD & COVERAGE

A sample of school off-site excursions was examined to ensure that the relevant policies and guidance had been adhered to and that a visit plan had been recorded correctly on the EVOLVE online excursion planning and management system. 13 visit plans from the following schools were selected from a list of 1,413 excursions which had taken place between 01/06/15 and 30/07/15:

- Fortrose Academy 3
- Culloden Academy 3
- Miller Academy Primary 3
- Strathpeffer Primary 3
- Arisaig Primary 1

## 4. MAIN FINDINGS

The main findings of the review, referenced to the above review objectives, are as follows:

**As this is a follow-up report, the audit recommendations, agreed actions, responsible officer(s) and target date for implementation (in brackets) from the previous audit report are provided in the shaded boxes. The findings from the follow up audit are then detailed below. Where the findings have shown that the agreed actions have not been fully implemented, a further audit recommendation has been made.**

### 4.1 Policies and Guidance are adhered to

The previous audit report made one medium grade recommendation with three parts which related to the need to review and update the guidance provided to schools and ensure that schools complied with this.

**Previous Audit Recommendation 3.1.1 (Medium grade)**

- (1) The Care and Learning Service should work with Community Services and High Life Highland to update the current guidance and procedures to ensure they are fit for purpose. This should ensure that the planning process is efficient and does not cause excessive workload for staff.
- (2) The Care and Learning Service should remind all schools of the procedures to be followed when recording the planning stage of an excursion within Evolve and the need to comply with them.
- (3) The Care and Learning Service should review and if necessary update the guidance for oversea home visits and challenging pupils.

**Previous Management Agreed Actions**

- (1) Guidance and procedures will be updated and reviewed by the Care and Learning Healthy and Safety Group. Engagement with school-based staff will take place to ensure proposals are practical from a school perspective.

Responsible officer: Head of Resources, Care and Learning Service (31/03/15)

- (2) Reminder to be issued to all schools.

Responsible officer: Head of Resources (Care and Learning Service) (31/12/14)

- (3) Guidance will be updated and reviewed by the Care and Learning Health and Safety Group. Engagement with school-based staff will take place to ensure proposals are practical from a school perspective.

Responsible officer: Head of Resources, Care and Learning Service (31/03/15)

This objective was partially achieved. In response to the first agreed action, High Life Highland (HLH) colleagues, other local authorities, the Head of Education, Area Education Managers, Education Quality Improvement Managers (EQIMs) and a number of Head Teachers were consulted during the process of reviewing the guidance and procedures. As a result the guidance was completely re-written and the updated version, 'The Highland Council and High Life Highland Excursions Policy and Guidance', was issued on the 15<sup>th</sup> June 2015. It is available on the HLH website (Outdoor Education section), there is a link to this from the Council's website, and it can also be found on the EVOLVE system.

4.1.1 For the second agreed action, a reminder had not been issued to schools by the target date. However, all Head Teachers, EQIMs, Area Education Managers, Head of Education, Head of Resources, and relevant HLH staff were made aware of the revised guidance by email on the 15/06/15. Information and links to the revised guidance were also posted on the HLH website, GLOW and EVOLVE. Therefore, all relevant staff should be aware of the current guidance that should be followed.

4.1.2 Despite this, from the sample of 13 EVOLVE visit plans examined, the revised guidance was not being consistently applied by staff when recording the planning stage of an excursion within EVOLVE:

- The most significant issues related to the approval of visit plans and the preparation of risk assessments for each excursion. 8 visit plans had not been submitted for approval within the specified time period and 2 had not been granted final approval by the Head Teacher. The guidance states that "staff are expected to consider and consult with Generic Risk Assessments in order to create their Excursion Risk Assessment" and that "the Excursion Risk Assessment should be attached to the EVOLVE visit plan". In 3 cases a Generic Risk Assessment had been attached to the visit plan rather than a specific Excursion Risk Assessment which indicates a lack of understanding of this requirement.
- An essential part of excursion planning is to ensure that the members of staff deployed possess the relevant competencies and qualifications appropriate to

the excursion. This information is recorded within the 'Awards' section on EVOLVE which all staff are required to keep up to date. This section had either not been completed for all staff or the relevant attachments had not been uploaded in support of the stated awards for all of the 13 visit plans examined.

- Even though guidance states that "the EVOLVE system should be used by all Highland Council children's establishments when deploying young people", 5 instances were identified whereby a visit plan had not been created on EVOLVE for a school off-site excursion.

The Outdoor Activity Manager (HLH) is aware of the issues noted above and believes that improvements could be made if Educational Visits Co-ordinator (EVC) training sessions were better attended. He/she is currently working with EQIMs to increase the number of EVCs attending training.

- 4.1.3 The third agreed action was that off-site excursion guidance relating to overseas home visits and challenging pupils would be reviewed and updated if necessary. These particular areas of concern had been raised by Head Teachers during the previous audit. SAPOE (Scottish Advisory Panel for Outdoor Education) are currently working on guidance for overseas visits with the final draft having closed for viewing on the 15/09/15. Basic guidance on overseas visits is included within the revised guidance. Also, some overseas excursion training has been delivered and the Outdoor Activities Manager (HLH) has recommended that it be delivered further.

However, guidance relating to challenging pupils has not yet been drafted. The Outdoor Activities Manager (HLH) has stated that he would require more information in order to establish whether or not there is a universal need for further guidance on this area as staff should already have access to the most suitable advice on these issues.

#### 4.2 **Safe use and recharging of minibuses**

This objective was partially achieved as only the low grade management agreed action has been implemented.

##### **Previous Audit Recommendation 3.2.1 (High grade)**

The Care and Learning Service should work with Community Services to ensure that the Council's policy and associated guidance is up to date, consistent and fit for purpose. The policy and guidance should be held in one place and easily accessible.

##### **Previous Management Agreed Actions**

Guidance to be reviewed and updated, making appropriate links to the on-going work of the Integrated Transport Project.

Responsible officers: Head of Resources, Care & Learning Service and Integrated Transport Development Officer, Community Services (31/03/15).

**Previous Audit Recommendation 3.2.2 (Medium grade)**

The Care and Learning Service have agreed to review the Council's minibus Policy and associated guidance. This review should address the points detailed above. Once this has been completed it should be distributed to all schools using minibuses and they should be instructed of the need to comply with the guidance.

**Previous Management Agreed Actions**

Policy and guidance to be reviewed and updated, making appropriate links to the ongoing work of the Integrated Transport Project. Engagement with school-based staff will take place to ensure proposals are practical from a school perspective.

Responsible officers: Head of Resources, Care & Learning Service and Integrated Transport Development Officer, Community Services (31/03/15).

- 4.2.1 Both of the above agreed actions relate to the Council's policy and associated guidance for minibus use and stated that this would be reviewed and updated, making appropriate links to the ongoing work of the Integrated Transport Project. Due to delays with the project, this was not completed within the agreed timescale but a new policy has been drafted and circulated to schools for consideration. The revised draft policy, which represents a significant revision from existing policy, and seeks to integrate minibus use more closely with Integrated Transport Project objectives, has required considerably more discussion and consultation with stakeholders than expected. It was originally intended that the final version of the policy and guidance would be presented for approval to the Community Services Committee on the 05/11/15 but due to the reasons noted above this has not been done.

**Previous Audit Recommendation 3.2.3 (Low grade)**

- (1) The Care and Learning Service should remind schools about the requirements of the Fuel Card User Reference Guide and the need to ensure that it is complied with.
- (2) Action should be taken to ensure that the fuel card costs are recoded to the correct cost centre.

**Previous Management Agreed Actions**

- (1) Reminder to be issued to schools.

Responsible officer: Head of Resources, Care and Learning Service (31/12/14)

- (2) The bus at Drummond School now has a fuel card which is correctly coded to the school.

Responsible officer: Head Teacher, Drummond School (Complete)

A reminder was posted on the ECS staff communication portal, Heads Up, on the 02/06/14 with a link to the latest fuel card guidance on the Intranet. The reminder was issued before the previous audit report was finalised and therefore this action should have been marked as complete.

**5. CONCLUSION**

There has been some progress made towards completion of the agreed actions following the previous audit. In particular the guidance relating to school off-site excursions has been updated and made available to schools. However, it is disappointing to report that this is still not being consistently applied by schools when recording the planning stage of an excursion on EVOLVE. The importance of staff complying with the guidance cannot be understated; if an incident occurred during an excursion, the Council could be found liable if this compliance cannot be evidenced. The revised guidance relating to minibus use was due to be presented

to the Community Services Committee on the 05/11/15 but this has not been done.

As a result of this follow-up audit, 2 high grade and 1 low grade recommendations have been made. In addition, due to the audit findings, the opinion of Limited Assurance remains. The recommendations have been accepted by management, with resultant agreed actions due to be implemented by the end of June 2016.

**6. AUDIT OPINION**

The opinion is based upon, and limited to, the work performed in respect of the subject under review. Internal Audit cannot provide total assurance that control weaknesses or irregularities do not exist. It is the opinion that **Limited Assurance** can be given in that whilst the system is broadly reliable, areas of weakness have been identified which put some of the system objectives at risk, and/ or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.

## 7. ACTION PLAN

The Action Plan contains 3 recommendations as follows:

### Description

Major issues that managers need to address as a matter of urgency.

Important issues that managers should address and will benefit the Organisation if implemented.

Minor issues that are not critical but managers should address.

### Total recommendations

Priority	Number
High	2
Medium	0
Low	1
	<b>3</b>

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
4.1.1	High	All relevant Council and HLH staff were made aware of the revised off-site excursion guidance by email on the 15/06/15. Information and links to the revised guidance were also posted on the HLH website, GLOW and EVOLVE. Therefore, all relevant staff should be aware of the current guidance.  However, from the sample of 13 EVOLVE visit plans examined, it was found that the guidance was not being consistently applied by staff when recording the planning stage of an excursion within EVOLVE. The Outdoor Activity Manager (HLH) believes that improvements could be made if EVC training sessions were better attended.	(1) An instruction should be issued to all schools regarding the requirement to adhere to the guidelines when recording the planning stage of an excursion on EVOLE and an explanation as to why this is so critical.  (2) Further steps should be taken to increase and monitor the uptake of EVC training.  (3) Monitoring of schools compliance with the guidance should be carried out on an ongoing basis.	(1) A further instruction will be issued to all schools, with regard to adherence to guidelines.  (2) A target to increase attendance at EVC training is being incorporated within the Service Health and Safety Action Plan, with performance indicators to monitor progress.  (3) This has been considered though at present scope for monitoring is limited within existing resources.	Head of Resources, Care and Learning	31/01/16
					Head of Resources, Care and Learning	31/03/16

REPORT REF.	GRADE	FINDING	RECOMMENDATION	MANAGEMENT AGREED ACTION	IMPLEMENTATION	
					RESPONSIBLE OFFICER	TARGET DATE
4.1.2	Low	It was agreed that the off-site excursion guidance for overseas home visits and challenging pupils would be updated and reviewed if necessary. However, this has not been done with regards to challenging pupils.	Information should be sought from Head Teachers as to whether or not the current level of guidance in this area is sufficient. Based on responses received, the guidance should be updated appropriately.	Linked with the issue of new national guidance, consultation with Head Teachers and other stakeholders will take place to assess what further action and guidance may be necessary.	Head of Resources, Care and Learning	30/06/16
4.2.1	High	It was agreed that the Council's minibus policy and associated guidance would be reviewed and updated by the 31/03/15. However, this has not yet been completed. It was intended that the revised policy and guidance would be presented to the Community Services Committee on the 05/11/15 but this has not been done.	The revised minibus policy and associated guidance should be finalised and presented to the next available Community Services Committee. If agreed, it should be distributed to all schools using minibuses and they should be reminded of the need to fully comply with the guidance.	A final policy proposal will be discussed with representatives of Primary and Secondary Head Teachers early in 2016, with the target of then taking a revised policy to the ECAS Committee in March 2016 for agreement.	Head of Resources, Care and Learning Principal Transport Officer, Community Services	30/04/16