

HEALTH & CARE PROFESSIONS COUNCIL

Project Management Benefits Realisation & Management

Internal audit report - Final
September 2024

LEVEL OF ASSURANCE:	
DESIGN	Moderate
EFFECTIVENESS	Substantial

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REPORT STATUS

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EXECUTIVE SUMMARY (PAGE 1 OF 2)

LEVEL OF ASSURANCE: (SEE APPENDIX FOR DEFINITIONS)			
DESIGN	MODERATE		Generally a sound system of internal control designed to achieve system objectives with some exceptions.
EFFECTIVENESS	SUBSTANTIAL		The controls that are in place are being consistently applied.
SUMMARY OF FINDINGS (SEE APPENDIX 11)			# OF AGREED ACTIONS
H	-		-
M	3		5
L	-		-
TOTAL NUMBER OF FINDINGS: 3			
OUR TESTING FOUND PROCEESS WORKING WELL REGARDING:			
<ul style="list-style-type: none"> ✓ Use of the Benefits Framework & associated controls - exceeds what we see in other organisations ✓ Inclusion of financial & non-financial benefits ✓ Reference to PSA standards & corporate priorities ✓ Oversight of benefits through the project lifecycle for the projects we reviewed. 			

BACKGROUND & SCOPE

This review was included as part of the 2023/24 internal audit plan with work conducted in 2024/25, to allow for the benefit framework to be reasonably embedded.

HCPC aims to be an efficient and effective regulator, while fully meeting PSA standards. To ensure investment in change activities clearly outlines the financial and non-financial benefits of projects, HCPC has developed, and continues to refine, a benefits management framework within the change project lifecycle.

Several recent key projects have been subject to the benefits management process - presenting benefits in investment cases, in-project benefits monitoring, and post project evaluation. Projects subject to the benefits framework include Business Central (new finance system), Frontloading (an FtP project to improve the speed and efficiency of FtP cases at their early stages), and a new HR recruitment portal.

A Change and Benefits Forum was created to review the investment cases, prior to the approval at ELT, and for ongoing monitoring of the live project portfolio and post-project benefits evaluation. The Forum comprises senior HCPC managers below ELT level. There is a mechanism and standard templates in place that report project benefits at each stage in detail and, in aggregate, across projects.

PURPOSE

The purpose of this review was to provide assurance over the design and operational effectiveness of HCPC's new project Benefits Management framework. This included assessing the progress in embedding the benefits management framework, identifying any gaps. We reviewed the Business Central, FtP CMS Phase 2, Frontloading FtP and the new HR recruitment portal.

CONCLUSION

Overall, we found that HCPC's benefits management is well-advanced, comprehensive and embedded in project processes and templates. There are good disciplines in place at the investment case through to post-project benefits realisation assessment stages. There are good linkages with corporate priorities including improving compliance with PSA standards.

There is also good challenge and oversight of projects and their benefits through the Change and Benefits Forum and ELT. The processes are under constant review and refinement. HCPC is well-advanced compared to other organisations.

However, we identified three key findings, with five underlying actions. All are assessed as Medium priority, largely stemming from the design of the benefits framework (noting that the developing nature of the benefits management framework over the timeframes of the projects we examined):

- ▶ **Benefits tend to reference intermediate rather than final outcomes**, or do not define the levels of success expected. **Benefits could also be prioritised**, allowing more focus.
- ▶ **The Change and Benefits Forum lacks clarity on its role**. It is more usual for organisations to make bigger investment decisions using an investment committee.
- ▶ **Investment cases do not reference risks** - risks the project is intended to mitigate, risks created by the project (however temporary they might be), and the risk of project failure or benefits not being realised.

As a result of our review, we can provide MODERATE assurance over the design and SUBSTANTIAL effectiveness of HCPC'S benefits management.



EXECUTIVE SUMMARY (PAGE 2 OF 2)

SUMMARY OF GOOD PRACTICE

We consider that the benefits management approach is designed well. Particularly, we commend the following aspects of the methodology:

- ▶ **A clear ‘golden thread’ links business cases to PSA standards** or other corporate plan objectives. Benefits are framed in business cases in this way.
- ▶ **Tangible, financial & intangible costs & non-financial benefits** are included throughout the benefits lifecycle.
- ▶ The inclusion of **cross-organisational resource** is understood in investment cases.
- ▶ Investment case assessment incorporates the evaluation of new project proposals against **projects already in flight** - thereby considering cost/benefits impact in the context of all projects.
- ▶ **A healthy challenge in project approvals** - cost/benefits of new projects are evaluated by the new **Change & Benefits Group**, then recommended to ELT for approval.
- ▶ **Ongoing scrutiny, refinement and update of benefits** is embedded in mid-project review, scrutiny and change control. Improvements made in benefit measurement, definition, and where benefits are de-scoped when projects need to scale back.
- ▶ There is **good reporting on project progress and related benefit realisation** (e.g. Project Investment Report & reports to ELT).
- ▶ **Financial benefits quantify the expected value of the benefit.** The Business Central Phase 2 project makes clear reference to the anticipated saving of staff time.

SUMMARY AREAS FOR IMPROVEMENT

Notwithstanding that the new methodology is new and needs to work its way through the delivery lifecycle for live projects, we also consider that there are five key areas to focus action:

- ▶ **Non-financial benefits do not include ‘final’ outputs** referenced against impact tangible business objectives or efficiencies, and quote only ‘intermediate’ or high level outputs.
- ▶ **Benefits do not state the level of change that deem the project outputs a success**, as many benefits quoted do not define outcomes precisely enough.
- ▶ **Benefits are not prioritised** - there are numerous benefits quoted in investment cases - prioritisation of key ones would enable a focus on key benefits and make investment decisions and benefits tracking more efficient.
- ▶ The **Change & Benefits Forum only ‘considers’ proposals.** It is usual practice in other organisations to make key investment decisions through an **investment committee**, which ensures the larger investment cases are scrutinised strategically.
- ▶ **Risks** avoided or managed (and risks that the proposed project might have or create) are not explicit in investment case and assessment templates.

KEY TAKEAWAYS



DETAILED FINDINGS



DETAILED FINDINGS

RISK: QUANTIFYING BENEFITS

FINDING 1 - QUANTIFYING BENEFITS - FINAL OUTPUTS & OUTCOMES			TYPE
<p>It is good practice to develop a range of benefits that consider the final impact on an organisation's or system's objectives and to quantify the level of success that the project is intended to achieve. Benefits that are merely to show an intermediate output, such as an increase in the number of transactions being processed, are unlikely alone to show how they affect the broader organisational objectives. Moreover, if the levels of success are not defined (e.g., the desired and intended percentage increase in transactions made per day), projects may be deemed to be a success when their impact might be only marginal, in practice. Also, sometimes achieving some benefits may also arise because of unrelated external factors (and external factors can reduce the benefit magnitude or impact).</p> <p>Financial benefits often quoted the expected level of savings in HCPC. However, we noted that for the projects we selected, HCPC project non-financial benefits tended to describe intermediate or subjective outputs. Also, benefits do not describe how much of an improvement or change was promised or expected, to deem the project as successful. Final outputs and measurable thresholds for success we found were not often articulated.</p> <p>We also noted that the initial benefits identification and onward tracking does not identify and prioritise key benefits from other benefits. Focusing on key benefits and tracking these would be more impactful and less time-consuming to maintain, both in investment cases and for ongoing, in-project benefits tracking.</p>			<p>DESIGN & EFFECTIVENESS</p> 
IMPLICATION			SIGNIFICANCE
Referencing benefits in terms of intermediate outputs, having ambiguity on levels of success desired and not prioritising benefits dilutes the impact and efficiency of the benefits management lifecycle in projects.			MEDIUM
RECOMMENDATIONS	ACTION OWNER	MANAGEMENT RESPONSE	COMPLETION DATE
1. During benefits review, at each stage of the project lifecycle, project teams and the review panels (especially the Change and Benefits Forum) should ensure that projects focus on citing the final outputs, define more exactly what success means and prioritise benefits into 'key benefits' and 'other'.	Kayleigh Birtwistle	<p>We can link the benefits against the 'must' scope items which will mean they're the key deliverables. regarding defining what success means, this detail will be part of the requirements outputs, which are moscow'd and has an agreed acceptance criteria rather than the investment case.</p> <p>we will agree to link this when carrying out the investment prioritisation for fy 25/26</p>	01/04/2025



DETAILED FINDINGS

RISK: APPLYING RISK ASSESSMENT THROUGH THE PROJECT LIFECYCLE

FINDING 2 - APPLYING RISK ASSESSMENT THROUGHOUT PROJECTS			TYPE
<p>The mitigation of risk is one factor which may influence the justification of an organisation’s project investment decision. Moreover, risks could be created by the project for the rest of the organisation, or the project’s successful delivery or long-term benefit could be vulnerable to uncertainties and other changes. These risks need to be factored in an investment decisions. For example, a project may be risky because it is inherently difficult to deliver; the likelihood of project benefits materialising may also be at risk due to changes outside of the organisation, or other changes within the organisation. Risks cited in investment cases should tie back to an organisation’s objectives.</p> <p>We noted that risk is factored into Project Initiation Documents (PID) - both the risks the project is intended to mitigate and the predicted project delivery risks. However, the investment case template, which precedes the PID, does not directly reference risks.</p> <p>We also noted that projects that do not directly impact the improvement or maintenance in keeping PSA standards will find their investment case harder to write. PSA standards are, rightly, front and centre of the business case template, but there are other risks to the organisation and more upfront articulation of risks will help to give more balance to investment cases and decisions.</p>			<p>DESIGN & EFFECTIVENESS</p> 
<p>IMPLICATION</p> <p>Management are less likely to assess the risks, either relating to what the project is intended to mitigate, or the risks generated by the project, or sufficiently mindful of the future likelihood and impact of the benefits being achieved.</p>			<p>SIGNIFICANCE</p> <p>MEDIUM</p>
RECOMMENDATIONS	ACTION OWNER	MANAGEMENT RESPONSE	COMPLETION DATE
<p>2. Add key risks as a required section in the investment case template.</p>	<p>Kayleigh Birtwistle</p>	<p>We accept the findings and add that further analysis will be completed as part of the new investment cycle.</p>	<p>01/04/2025</p>



DETAILED FINDINGS

RISK: TERMS OF REFERENCE - CHANGE AND BENEFITS GROUP

FINDING 3- TERMS OF REFERENCE			TYPE
<p>Those groups charged by an organisation’s leadership to review project investment cases and ongoing benefits need to have clear responsibilities and accountabilities, including clear rights of approval or recommendation, and be clear where their role is merely to be informed or consulted. The role of such a group in any organisation is best written down and agreed. Using the RACI (Responsible, Accountable, Consulted, Informed) model helps to clarify the distinction of roles. In many organisations, an Investment Committee has the primary authority as a delegated committee of the board, on the larger investment decisions.</p> <p>We note that HCPC’s Change and Benefits Group provide a pivotal role in reviewing the quality of project investment cases and the ongoing monitoring of HCPC’s project portfolio. However, the terms of reference states that the group only ‘considers’ investment cases. It does not make it clear whether the group has the authority to approve or recommend investment cases to ELT for their approval. ‘Considers’ is a weaker term in terms of governance. Our assessment is that given what the group does and its position in the organisation, it recommends business investment cases to ELT and informs ELT and ultimately Council on progress of HCPC projects and the key issues and risks arising and the outcome of post-project evaluations.</p> <p>Nevertheless, in many organisations, the larger investment approving body is a sub-committee of the board, called the Investment Committee. The investment committee usually has senior representation from finance, HR, IT and board.</p> <p>The Change and Benefits Group may also find itself having to have observations and make recommendations for in-flight projects to take corrective action. The terms of reference is not clear on its authority for live projects.</p>			<p>DESIGN</p> 
IMPLICATION			SIGNIFICANCE
It is unclear what the authority the Change and Benefits Group has. The current terms of reference does not specify if the Group has the authority to recommend or approve, be informed, inform others, etc.			MEDIUM
RECOMMENDATIONS	ACTION OWNER	MANAGEMENT RESPONSE	COMPLETION DATE
3. Clarify the authority of the Change and Benefits Group, particularly whether it recommends investment cases to ELT for ELT approval . It would also be useful to clarify its authority over live projects. Alternatively, HCPC should stand up an investment committee to conduct the approval on behalf of the board (i.e. Council).	Kayleigh Birtwistle	We accept this recommendation and will update the TOR to clarify the role of the CBF.	19 /09/2024

APPENDICES



APPENDIX I: STAFF INTERVIEWED

BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

Paul Cooper	Head of Projects & Programmes	KEY SPONSOR (& for FtP Frontloading)
Kayleigh Birtwistle	Programme Manager	ACTION OWNER
Paula Libanio	Project Support Officer	
Alan Keshtmand	Head of Finance	Re. Business Central
Aditya Palai	HR	Re. Recruitment Portal



APPENDIX II: DEFINITIONS

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

RECOMMENDATION SIGNIFICANCE	
HIGH	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
MEDIUM	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
LOW	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.
ADVISORY	A weakness that does not have a risk impact or consequence but has been raised to highlight areas of inefficiencies or potential best practice improvements.



APPENDIX III: TERMS OF REFERENCE

EXTRACT FROM TERMS OF REFERENCE

PURPOSE

The purpose of this review is to provide assurance over the design and operational effectiveness, especially of the initial investment decision process, for HCPC's new project Benefits Management lifecycle. This will include assessing the progress in embedding the benefits management framework already set up and operating (using a sample of projects in flight that are using the new benefits management methodology). It will also evaluate the design of the benefits framework across the whole project lifecycle given the experience so far. We will seek to identify any gaps and recommend pragmatic improvements (balancing any additional management effort versus reward).

KEY RISKS

Key risks are covered, relating to mainly the investment decision stage - benefits not broad enough (e.g., financial or non-financial only), benefits & benefits management process not clear, governance does not allow effective challenge and the portfolio review, project controls do not permit sufficient monitoring and course correction where deviations occur, and the methods are poorly communicated and understood throughout the business.

SCOPE

Management have specifically requested that the review considers and advises the treatment of non-financial benefits, as well as financial benefits, and evaluate efforts to link them to the corporate risks and ensure they are SMART (specific, measurable, achievable, relevant and timely). The focus is on the business case stage, as this is the most mature in development.

APPROACH

The review will be conducted by a workshop and one-to-one interviews with key staff members. A focus will be on the investment decision stage as this is the stage which has had the most attention and is the most critical for embedding the new benefits methodology

EXCLUSIONS

This is not a review of the full project management methodology and its application. The focus is on benefits management and the new framework HCPC have developed. Where the framework has been applied on current projects, particularly at the investment decision state, we use examples of these projects as case studies on the implementation of the benefits management framework. Where the framework has been designed but no projects have reached that stage, we will evaluate the design of the benefits framework. We will include the consideration of all benefits. This will include financial benefits as part of the wider benefits framework, but the non-financial benefits and their full elucidation is the primary focus of the review.



APPENDIX III - CONT'D

PURPOSE OF THE REVIEW

The purpose of this review was to provide assurance over the design and operational effectiveness, especially of the initial investment decision process, for HCPC's new project Benefits Management lifecycle. This will include assessing the progress in embedding the benefits management framework already set up and operating (using a sample of projects in flight that are using the new benefits management methodology). It will also evaluate the design of the benefits framework across the whole project lifecycle given the experience so far. We will seek to identify any gaps and recommend pragmatic improvements (balancing any additional management effort versus reward).

SCOPE AREA	KEY RISKS	APPROACH
Benefits Management process	<p>The investment decision stages for current projects at this stage are not considering adequately enough the benefits of the investment, including non-financial as well as financial benefits. The benefits management process is unclear, incomplete or ineffective.</p> <p>Benefits derived from the benefits management process are not broad enough in range anticipated through the project lifecycle (for example, there remains a focus on financial benefits only)</p>	<ul style="list-style-type: none"> Review recent investment decisions and the supporting business cases to establish if benefits is properly embedded in a meaningful way when choosing projects for investment. Evaluate the current Benefits Management framework, processes, and procedures. Confirm how benefits are defined (considering alignment to strategic objectives), categorised, baselined and how metrics are set. Gathering stakeholders' views on the current framework and approach. Review supporting documentation and guidance such as the Corporate risks and Benefits Catalogue Understanding the Portfolio view, including post-investment reporting of benefits.
Governance Arrangements	The current model and membership of governance boards does not allow for effective challenge, approval and oversight of benefits through the project lifecycle.	<ul style="list-style-type: none"> Understand the role of the Executive Leadership Team (ELT) in Benefits approvals and oversight, and the other roles in the benefits management process. Review documentation pertaining to the new Change and Benefits Forum to understand its purpose, membership, remit and operation.
Project Controls	The project controls in place do not encourage appropriate consideration and management of benefits throughout the project lifecycle.	<ul style="list-style-type: none"> Reviewing benefits logs, project documentation, and realisation plans associated with sampled projects. Review evidence and test understanding, through interviews and sampled documentation, of how benefits are evaluated approved, reported and overseen through the project lifecycle Considering the intended use of lessons learned exercises to evaluate the effectiveness of benefits framework.
Communications and Engagement	Changes to processes / guidance are not effectively communicated leading to a lack of understanding in the organisation on the actions they are expected to take to improve benefits management and realisation.	<ul style="list-style-type: none"> Evaluate the guidance and training given on the benefits framework, to maximise the focus on the broadest range of benefits, as defined by the benefits framework. Establish through interviews the understanding of the expectations regarding what to consider when setting benefits, reporting requirements, quality expectation and how to plan for benefits realisation post-project



APPENDIX IV: LIMITATIONS AND RESPONSIBILITIES

MANAGEMENT RESPONSIBILITIES

The Board is responsible for determining the scope of internal audit work, and for deciding the action to be taken on the outcome of our findings from our work.

The Board is responsible for ensuring the internal audit function has:

- The support of the Company’s management team.
- Direct access and freedom to report to senior management, including the Chair of the Audit Committee.
- The Board is responsible for the establishment and proper operation of a system of internal control, including proper accounting records and other management information suitable for running the Company.

Internal controls covers the whole system of controls, financial and otherwise, established by the Board in order to carry on the business of the Company in an orderly and efficient manner, ensure adherence to management policies, safeguard the assets and secure as far as possible the completeness and accuracy of the records. The individual components of an internal control system are known as ‘controls’ or ‘internal controls’.

The Board is responsible for risk management in the organisation, and for deciding the action to be taken on the outcome of any findings from our work. The identification of risks and the strategies put in place to deal with identified risks remain the sole responsibility of the Board.

LIMITATIONS

The scope of the review is limited to the areas documented under Appendix II - Terms of reference. All other areas are considered outside of the scope of this review.

Our work is inherently limited by the honest representation of those interviewed as part of colleagues interviewed as part of the review. Our work and conclusion is subject to sampling risk, which means that our work may not be representative of the full population.

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Our assessment of controls is for the period specified only. Historic evaluation of effectiveness may not be relevant to future periods due to the risk that: the design of controls may become inadequate because of changes in operating environment, law, regulation or other; or the degree of compliance with policies and procedures may deteriorate.

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