



**Police and Crime Commissioner for Gwent and Chief
Constable of Gwent Police**

Summary Internal Controls Assurance (SICA) Report

2017/18

INTRODUCTION

1. This summary report provides the Joint Audit Committee with an update on the progress of our work as at 12th December 2017.

PROGRESS AGAINST THE 2017/18 ANNUAL PLAN

2. Our progress against the Annual Plan for 2017/18 is set out in Appendix A. A copy of the agreed plan is included at Appendix B.

INTERNAL CONTROL FRAMEWORK

3. The key strategic governance, risk management and control matters identified from the ten further reviews completed from the 2017/18 Audit Plan is summarised below.

Key Strategic Governance, Risk Management and Control Matters

Review	High level
<p>Stop and Search – Compliance Testing</p>	<ul style="list-style-type: none"> • “Reasonable grounds” were recorded in 60% of the sample tested in line with the legal requirements. • Supervisor checks were completed for 75% of the sample tested. • Further guidance and training needs to be provided to Officers and Supervising Officers to ensure that all aspects of the Stop and Search files are fully completed.
<p>Interim – Follow Up</p>	<ul style="list-style-type: none"> • In total, 56 Priority 1, 2 and 3 recommendations were followed up and the outcomes recorded in this report. There has been very good progress with the completion of the recommendations with 71% being implemented. Sixteen recommendations (29%) have been given revised target dates and these need to be completed by the new dates set.

Review	High level
<p>Staying Ahead 8 Theme – Corporate Communications</p>	<ul style="list-style-type: none"> • No recommendations have been raised within this report but only reasonable assurance can be provided as recommendations remain outstanding from TIAA’s 2016/17 review of Corporate Communications which are key to the governance arrangements detailed in this report. • It is acknowledged that the Corporate Communications Team has had a number of changes to management since the implementation of the Staying Ahead 8 workstream which resulted in the restructure of the Team. • The current Head of Corporate Communications joined the Force in May 2017.
<p>Counter Fraud – Cyber Security Awareness</p>	<ul style="list-style-type: none"> • There is no process in place to set and monitor a target date for the completion of the NCALT Level I Information Governance training programme by police staff. • Regular payment card guidance needs to be provided to all cardholders identifying the fraud risks relating to the use of payment cards. • Sufficient prioritisation needs to be applied to housekeeping tasks and the issues identified in vulnerability scans to ensure that they are addressed in a timely manner by SRS. • There is no centralised proactive approach to cyber-crime/fraud training with training currently being delivered reactively or at a local level
<p>Estate Management - Delivery</p>	<ul style="list-style-type: none"> • There are arrangements in place for oversight of the Estates Strategy through the Estates Strategy Board and Estates Implementation Group. The Joint Fire, Police and Ambulance hub at Abertillery project is in line with the Outline Estates Strategy. There are robust arrangements in place for monitoring the planned maintenance through the Shared Facilities Management. The Estates Strategy Board and Estates Implementation Group have both had new terms of reference developed in 2017 with a view to providing enhanced scrutiny and oversight to maximise the effectiveness of delivery of the Estates Strategy and to provide a defined link between governance of the Estates Strategy and operational delivery, it will take time for the effectiveness of the arrangements to be assessed and for the necessary improvements to be realised. • Presentation of information on the annual maintenance plan is not currently included as a standard agenda item for the Estates Implementation Group; • A formal process for post project review of Estates schemes needs to be implemented.

Review	High level
Capital Programme	<p>Sound governance arrangements are in place for planning, control, monitoring and reporting on the Capital Programme. Issues were identified within some operational aspects.</p> <ul style="list-style-type: none"> • The rationale behind key decisions made by the Finance Team need to be documented to provide increased transparency and clarity. • No future projections for cash flows are being monitored by Finance with only actual costs being recorded. • The spreadsheet maintained by Finance for the purpose of monitoring the actuals to date contained errors, exposing a risk of reporting incorrect figures.
Treasury Management	<ul style="list-style-type: none"> • Treasury Management processes and actions were operating in accordance with the approved Treasury Management Strategy. • The Police and Crime Commissioner has received the three required Treasury Management reports including; an annual treasury management strategy, an annual treasury management activity report and a mid-year monitoring report. • The Financial Procedures Manual does not list the most recent structure of the Finance Team.
Agresso – Opening Balances Phase 1	<p>The first stage of the review was to confirm the accuracy of the transfer of opening balances into the ABW system from the previous finance system, Lawson and to confirm the first three months transactions April to June 2017 taken from Lawson and entered into the BW system.</p> <p>There are no recommendations arising from the review.</p>
HR Management - Strategy	<p>The human resources arrangements within Gwent Police are currently in the process of extensive change through the collaboration within South Wales Police on the FIRMS (Fully Integrated Resource Management Systems) project. This project will need to be completed and the changes fully imbedded to ensure effective control over the human resources arrangements.</p> <ul style="list-style-type: none"> • A People Plan 2016-19 has been documented which establishes the strategic priorities for human resource management within the force; • There is currently no process within People Services for monitoring and ensuring the completion of staff inductions and probationary reviews.

Review	High level
HR Learning and Development	<p>There are arrangements in place for effectively determining and managing learning and development within the Force through the People Plan 2016-2019, Talent Management Strategy and the Learning and Development work plan.</p> <ul style="list-style-type: none"> • Following changes to the governance structure and the establishment of the Learning and Development Strategy Group there is a need to formally determine the reporting requirements for the Group.

EMERGING GOVERNANCE, RISK AND INTERNAL CONTROL RELATED ISSUES

- At this stage we have identified no emerging strategic risks which could impact on the overall effectiveness of the governance, risk and internal control framework, which would adversely impact our annual opinion.

AUDITS COMPLETED SINCE THE LAST REPORT TO COMMITTEE

- The table below sets out details of 2017/18 audits finalised since the previous meeting of the Joint Audit Committee.

Review	Evaluation	Key Dates			Number of Recommendations			
		Draft issued	Responses Received	Final issued	1	2	3	OE
Stop and Search – Compliance Testing	Reasonable	29/08/2017	13/09/2017	15/09/2017	0	6	1	1
Interim – Follow Up	Very good progress	05/09/2017	07/09/2017	19/09/2017	Not applicable			
Staying ahead 8 themes – Corporate Communications	Reasonable	15/09/2017	19/09/2017	21/09/2017	0	0	0	0
Counter Fraud – ICT Cyber Security Awareness	Reasonable	08/09/2017	03/10/2017	04/10/2017	0	3	0	1

Review	Evaluation	Key Dates			Number of Recommendations			
		Draft issued	Responses Received	Final issued	1	2	3	OE
Estate Management - Delivery	Reasonable	10/10/2017	18/10/2017	13/11/2017	0	1	1	2
Capital Programme	Reasonable	06/11/2017	09/11/2017	14/11/2017	0	3	1	0
Treasury Management	Substantial	22/11/2017	27/11/2017	05/12/2017	0	0	1	0
Agresso Opening Balances	Phase review 1	15/11/2017	07/12/2017	11/12/2017	0	0	0	0
HR Management Strategy	Reasonable	12/09/2017	12/12/2017	12/12/2017	0	1	2	2
HR Learning and Development	Reasonable	31/07/2017	12/12/2017	12/12/2017	0	1	2	4

6. A summary of recent briefings on developments on which TIAA have issued client briefing notes in risk / governance is given at Appendix C

CHANGES TO THE ANNUAL PLAN 2017/18

7. The review of a sample of Stop and Search cases was added to the plan, which has now been finalised. There are no further amendments at this stage, other than operational changes to dates as noted in Appendix A.

FRAUDS/IRREGULARITIES

8. We have not been advised of any frauds or irregularities in the period since the last summary report was issued.

LIAISON

9. **Liaison with external audit:** We maintain ongoing communication with the Wales Audit Office.

PROGRESS ACTIONING PRIORITY 1 RECOMMENDATIONS

10. We have been advised that progress of completion of recommendations is monitored internally and not to include within this summary report, following a decision at the February 2016 Joint Audit Committee.

RESPONSIBILITY/DISCLAIMER

11. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. The matters raised in this report not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Progress against the Annual Plan for 2017/18

System	Planned Quarter	Days	Revised Quarter	Current Status	Comments
Governance – Strategic Planning	1	10	1 & 3	Audit commenced Stage 1 complete – a letter was issued 09/05/2017 Stage 2 – in progress 4 th December 2017	It was agreed that the audit be undertaken in two parts, the first stage to be a light touch review of the progress made in defining the revised meeting structure. The audit will subsequently take place in quarter 3.
Risk Management – Mitigating Controls	1	10	1	Final Report issued	
Fleet Management – Delivery	1	8	1	Final Report issued	
HR Management – Learning and Development	1	4	1	Final Report issued	
HR Management - Strategy	1	7	2	Final Report issued	
Vetting	1	8	1	Final Report issued	
Stop and Search (Compliance testing)	-	3	2	Final Report issued	
Budgetary Control	2	5	3	APM issued	Phased two start date 15 th January 2018
Capital Programme	2	4	2	Final Report issued	
Counter Fraud	2	7	2	Final Report issued	
Estate Management - Delivery	2	7	2	Final Report issued	
Collaborative Project - JSIU	2	4	4	APM issued	Date to be agreed

System	Planned Quarter	Days	Revised Quarter	Current Status	Comments
Staying Ahead 8 - Themes	2	12	2	Final Report issued	
Follow Up	2	5	2	Final Report issued	
Treasury Management	3	5	3	Final Report issued	
Agresso Opening Balances	3	-	3	Final Report issued	
General Ledger	3	5	3	APM issued	Phased two start date 15 th January 2018
Payroll	3	5	3	Draft Report issued	
Creditors	3	5	3	APM issued	Phased two start date 15 th January 2018
Debtors	3	4	3	APM issued	Phased two start date 15 th January 2018
Finance and Resource System Implementation	1 - 4	6	2 - 4	APM issued	Scope to be agreed
Follow Up	4	5	4	APM issued	Planned start date 19 th February 2018
Liaison with WAO	1 - 4	3	1 - 4		
2017/18 Annual Plan	1	2	1	Final report issued	
Strategic Plan	1	4	1	Final report issued	
2017/18 Annual Report	4	2	4		
Audit Management	1 - 4	15	1 - 4		

KEY:

	=	To be commenced
	=	Site work commenced
	=	Draft report issued
	=	Final report issued

Annual Plan – 2017/18

Quarter	Audit	Type	Days	Rationale
1	Governance – Strategic Planning	Assurance	10	<p><u>Rationale</u> Rolling programme of Governance reviews covering key risk areas.</p> <p><u>Scope</u> The review considers the arrangements by which the Force Boards and the Police and Crime Commissioner ensure that the corporate plans for the organisations remain achievable in times of economic uncertainty. The scope of the review does not include consideration of the strategic control arrangements or the appropriateness of decisions taken by the Boards.</p> <p><u>Executive Leads</u> Sian Curley - Chief of staff, Nigel Stephens - Assistant Chief Officer Resources.</p> <p><u>Departmental Lead</u> To be advised.</p>
1	Risk Management – Mitigating Controls	Compliance	10	<p><u>Rationale</u> Included in each year of the Strategic Plan to ensure that there are effective controls in place for the most significant risks. Number of days will cover the review of two risks</p> <p><u>Scope</u> Five risks currently included in the organisation’s business significant risk map will be selected and the effectiveness of the identified controls will be reviewed. The scope of the review does not include consideration of all potential mitigating arrangements or their effectiveness in minimising the opportunities for the identified risks to occur.</p> <p><u>Executive Lead</u> To be advised.</p> <p><u>Departmental Lead</u> Chief Supt. Kirk</p>

Quarter	Audit	Type	Days	Rationale
1	Fleet Management – Delivery	Appraisal	8	<p><u>Rationale</u> A review of an aspect of Fleet Management has been included in each year of the Strategy.</p> <p><u>Scope</u> The review will appraise the effectiveness of the delivery of the fleet management repairs and maintenance arrangements, including the planning of services and MOT's, responsive repairs and general maintenance.</p> <p><u>Executive lead</u> Assistant Chief Officer – Resources – Nigel Stephens</p> <p><u>Departmental Lead</u> Head of Fleet - Julie Reynolds</p>
1	HR Management – Learning and Development	Assurance	4	<p><u>Rationale</u> Review of HR Management arrangements included in each year of the plan. This area requested by Management.</p> <p><u>Scope</u> The review considers the arrangements for: determining the leaning and development requirements; the monitoring arrangements; and reporting to Boards. The scope of the review does not include verification that all staff have been correctly appraised or that all learning and development needs have been correctly assessed, or the arrangements for provision of in-house training. This review is applicable to Police Staff only.</p> <p><u>Executive lead</u> Assistant Chief Officer – Resources – Nigel Stephens</p> <p><u>Departmental Lead</u> Neil Lewis, People Services</p>

Quarter	Audit	Type	Days	Rationale
1	HR Management - Strategy		7	<p><u>Rationale</u> Review of HR Management arrangements included in each year of the plan.</p> <p><u>Scope</u> The review considers the arrangements for: inductions; maintaining staff handbook; maintaining job descriptions and person specifications; appraisals; disciplinaries; sickness and leave monitoring; and exit meetings. The scope of the review does not include: the training and development arrangements; promotion and/or merit awards.</p> <p><u>Executive lead</u> Assistant Chief Officer – Resources – Nigel Stephens</p> <p><u>Departmental Lead</u> Neil Lewis, People Services</p>
1	Vetting	Compliance	8	<p><u>Rationale</u> High risk area if effective arrangements not in place. Issues were identified at other Forces in 2016/17.</p> <p><u>Scope</u> The review will assess compliance with the internal vetting policy. The scope of the review will not include providing assurance that all relevant staff and contractors are vetted.</p> <p><u>Executive lead</u> Assistant Chief Officer – Resources – Nigel Stephens</p> <p><u>Departmental Lead</u> To be advised.</p>

Quarter	Audit	Type	Days	Rationale
2	Budgetary Control	Assurance	5	<p><u>Rationale</u> Key Audit risk area completed annually. Particularly important due to the continued cuts in funding and preparation for new finance system.</p> <p><u>Scope</u> The review considers the budget preparation process, the monitoring arrangements, and reporting to the Strategy and Performance Board. The scope of the review does not include consideration of the assumptions used in preparing the budgets; depreciation policies; apportionment of central costs; or financial information included in tenders prepared by the organisation.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer Resources Darren Garwood – CFO (PCC)</p> <p><u>Departmental Lead</u> Ken Chedzey – Principal Management Accountant</p>
2	Capital Programme	Assurance	4	<p><u>Rationale</u> Key Audit risk area completed bi-annually. Included in this year’s plan due to timing and the preparation for new finance system.</p> <p><u>Scope</u> The review considers the arrangements for accounting for the capital programme. The scope of the review does not include consideration of the funding arrangements or the specification of the projects.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer Resources</p> <p><u>Departmental Lead</u> Ken Chedzey, Principal Management Accountant.</p>

Quarter	Audit	Type	Days	Rationale
2	Counter Fraud	Compliance	7	<p><u>Rationale</u> A review to test areas of exposure to fraud has been included in each year of the plan.</p> <p><u>Scope</u> To be discussed.</p> <p><u>Executive Lead</u> To be advised.</p> <p><u>Departmental Lead</u> To be advised.</p>
2	Estate Management - Delivery	Compliance	7	<p><u>Rationale</u> Newly developed Estate Management Strategy reviewed in 2016/17. Limited internal audit coverage previously.</p> <p><u>Scope</u> The review will consider how the Estates Management Strategy is being delivered. The area of the Strategy to be tested is to be discussed with Chief Officers.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer Resources</p> <p><u>Departmental Lead</u> Kieran McHugh - Estates</p>
2	Collaborative Project	Compliance	4	<p><u>Rationale</u> Included in the plan annually, due to the increasing number of collaborative projects.</p> <p><u>Scope</u> This review across 3 Forces will consider the effectiveness of the Governance and Outcome delivery arrangements for the Joint Scientific Inspection Unit.</p> <p>.</p> <p><u>Executive Lead</u> To be advised.</p> <p><u>Departmental Lead</u> To be advised.</p>

Quarter	Audit	Type	Days	Rationale
2	Staying Ahead 8 - Themes	Compliance	12	<p><u>Rationale</u> Key Project to drive improvements in efficient and effective delivery and achieve savings.</p> <p><u>Scope</u> To be discussed.</p> <p><u>Executive Lead</u> To be advised.</p> <p><u>Departmental Lead</u> To be advised.</p>
2	Follow Up	F/Up	5	The review ascertains whether management action has been taken to address the Priority 1 & 2 recommendations arising from selected internal audit work carried out in the previous financial year.
3	Treasury Management	Assurance	5	<p><u>Rationale</u> Key financial risk – audited bi-annually.</p> <p><u>Scope</u> The review considers the arrangements for controlling the investment and borrowing arrangements; compliance with the organisation’s overall policy; banking arrangements; reconciliations and the reporting to committee. The scope of the review does not include consideration of the appropriateness of any individual financial institution or broker or of individual investment decisions made by the organisation.</p> <p><u>Executive Lead</u> Darren Garwood Pask – Chief Finance Officer PCC</p> <p><u>Departmental Lead</u> Hywel Morgan - Financial Accountant</p>

Quarter	Audit	Type	Days	Rationale
3	General Ledger	Assurance	5	<p><u>Rationale</u> Key financial risk area completed annually</p> <p><u>Scope</u> The review considers the arrangements for providing an effective audit trail for data entered onto the general ledger and the appropriateness of the reports generated. The scope of the review does not extend to the budgetary control arrangements and bank reconciliations.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer – Resources</p> <p><u>Departmental Lead</u> Hywel Morgan - Financial Accountant</p>
3	Payroll	Assurance	5	<p><u>Rationale</u> Key financial risk area completed annually</p> <p><u>Scope</u> The review considers the arrangements for: the creation, amendment and deletion of payroll records; payment of allowances and pay awards; and payment of salaries. The scope of the review does not include determination of salary scales, appointment and removal of staff, severance payments or reimbursement of travel and subsistence expenses, or pension arrangements.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer – Resources</p> <p><u>Departmental Lead</u> Hywel Morgan - Financial Accountant</p>

Quarter	Audit	Type	Days	Rationale
3	Creditors	Assurance	5	<p><u>Rationale</u> Key financial risk area completed annually</p> <p><u>Scope</u> The review considers the arrangements for authorising and paying costs incurred by the organisation and the arrangement for control of the organisation's cheques and automated payments. The scope does not include providing an assurance that the expenditure was necessary or that value for money was achieved from the expenditure committed.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer – Resources</p> <p><u>Departmental Lead</u> Hywel Morgan - Financial Accountant</p>
3	Debtors	Assurance	4	<p><u>Rationale</u> Key financial risk area completed annually</p> <p><u>Scope</u> The review considers the raising of debtor accounts, collection of income, receipting, storage and banking of income received by the organisation. The scope of the review does not include identification of the activities giving rise to income for the organisation, the basis of calculating the rates to be charged or that all income receivable has been identified.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer – Resources</p> <p><u>Departmental Lead</u> Hywel Morgan - Financial Accountant</p>

Quarter	Audit	Type	Days	Rationale
1 - 4	Finance and Resource System Implementation	Appraisal	6	<p><u>Rationale</u> Proactive review to provide advice and guidance during the new system implementation.</p> <p><u>Scope</u> Advice and guidance on the controls in the new finance system being implemented with South Wales Police will be provided throughout the year as required.</p> <p><u>Executive Lead</u> Nigel Stephens – Assistant Chief Officer Resources</p> <p><u>Departmental Lead</u> Steph Bradly, FIRMs Project Manager</p>
4	Follow Up	F/Up	5	The review ascertains whether management action has been taken to address the Priority 1 & 2 recommendations arising from selected internal audit work carried out in the previous financial year.
1 - 4	Liaison with WAO		3	
1	2017/18 Annual Plan		2	
1	Strategic Plan		4	
4	2017/18 Annual Report		2	
1-4	Audit Management		15	This time includes attendance at Joint Audit Committee meetings and overall contract management.
		Total days	152	

Briefings on Developments in Governance, Risk and Control

Summary of Recent Client Briefing Notes (CBNs)

TIAA produce regular briefing notes to summarise new developments in Governance, Risk, Control and Counter Fraud which may have an impact on our clients. These are shared with clients and made available through our Online Client Portal. A summary list of those CBNs issued in the last three months which may be of relevance to Gwent Police is given below. Copies of any CBNs are available on request from your local TIAA team.

Date Issued	CBN Ref	Subject	Status	TIAA Comments
08/12/2017	CBN-17042	Local Government - CIPFA Fraud and Corruption Tracker Report 2017	For Possible Action	<p>Councillors and Audit Committee Members to note this report, and consider the level of fraud resilience in place and effectiveness of the organisation's counter fraud activity.</p> <p>Specific issues to reflect upon:</p> <ul style="list-style-type: none"> • Does your Council have a focussed counter fraud strategy in place which is underpinned by a bespoke fraud risk assessment? • Do you have sufficient specialist proactive counter fraud detection and prevention activities? • How does your counter fraud activity measure against the findings of this report?
14/11/2017	CBN-17037	All - Regulator warns Charities to take action to combat Fraud	For Action	<p>Audit Committees and Boards/Governing Bodies are advised to seek assurance that IT systems are up to date, that security patches are regularly downloaded and anti-spyware programmes are in use.</p> <p>Technical systems provide a high level of protection, however staff can be the 'weak link' if they do not spot fraudulent emails or SMS messages. An on-line cyber crime awareness training module, designed to help alert staff to the risks in this area, is available from TIAA.</p>
14/11/2017	CBN-17036	Local Government - Government Digital Services extends the 'GOV.UK Notify' platform to Local Authorities	For Information	<p>Audit Committees and Boards/Governing Bodies are advised to note the extension of the GOV.UK Notify platform into local government.</p>

Date Issued	CBN Ref	Subject	Status	TIAA Comments
06/11/2017	CBN-17035	All - ICO Consultation on EU GDPR Guidance on Contracts and Liabilities between Controllers and Processors	For Possible Action	Audit Committees and Boards/Governing Bodies are advised to consider whether the organisation's GDPR preparations include consideration of what contracts include regarding the responsibilities and liabilities which processors have under GDPR.
27/10/2017	CBN-17033	All - Does the thought of a "Bad Rabbit" malware infection make you "Wannacry"?	For Action	Clients are advised to ensure their IT departments are aware of this issue, and enforce the urgency of cyber security. The risks associated with malware should be included on appropriate risk registers, and regularly reviewed to ensure the mitigation measures are kept refreshed.
19/10/2017	CBN-17032	All - Identification of Counterfeit Banknotes	For Possible Action	Cash handling staff should be provided with guidance on how to recognise counterfeit notes. Counterfeit notes are worthless. If you suspect a note is counterfeit, take it to the police as soon as possible.
18/10/2017	CBN-17031	Information Commissioner's Office (ICO) Guidance on Unauthorised Accessing of Patient Records	For Possible Action	Audit Committees and Boards/Governing Bodies are advised to ensure that their data protection policies and training are appropriately worded so the rules are clear in this regard.
19/09/2017	CBN-17029	All - COSO Enterprise Risk Management Update	For Information	Audit Committees and Boards/Governing Bodies are advised to note the updated Enterprise Risk Management publication issued by COSO when reviewing their risk management policy and procedures.
19/09/2017	CBN-17028	All - NAO Guidance on Cyber Security and Information Risk	For Possible Action	Audit Committees are advised to note the new guidance, and to review their understanding and coverage of cyber security and information risks.
14/09/2017	CBN-17027	Public Sector - Government may fine Organisations up to £18m (or 4% Turnover) for Failing to Adopt Cybersecurity Measures	For Possible Action	Audit Committees and Boards/Governing Bodies are recommended to seek assurance that their IT provisions include clearly defined, effective and managed cybersecurity measures. In readiness for the new directive organisations should ascertain whether the arrangements in place demonstrate appropriate measures if a cybersecurity incident occurs.

Date Issued	CBN Ref	Subject	Status	TIAA Comments
06/09/2017	CBN-17026	All - The Need to Embed Cyber Security within Procurement	For Action	<p>Audit Committees and Boards/Governing Bodies are advised to confirm whether procurement processes reflect an ongoing commitment to keep IT systems safe and secure.</p> <p>Weak IT system security and unpatched systems should be recognised as a corporate risk, as any data breach could result in significant reputational damage plus a fine up to £500,000 under the Data Protection Act (increasing up to €20M or 4% turnover when the new General Data Protection Regulations come into force in May 2018.)</p>