

Risk, Audit and Governance Committee

23 July 2025

Agenda item number 13

Implementation of internal audit recommendations summary of progress

Report by Senior Accountant

Summary

This report gives a summary of progress in implementing Internal Audit recommendations arising out of audits carried out during 2020/21, 2023/24 and 2024/25.

Recommendation

To note the report.

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1. Introduction

- 1.1. This report gives an update on implementing the Authority's Internal Audit report recommendations, focusing on outstanding recommendations and timescales to complete outstanding work.
- 1.2. Appendices 1, 2, 3 and 4 give details of the audits carried out in 2020/21, 2023/24, and 2024/25, in particular:
 - Recommendations not yet implemented;
 - Recommendations implemented since the last meeting; and
 - New recommendations since the last meeting.

2. Summary of Progress

- 2.1. The recommendation 3 on the Pilotage (Port Marine Safety Code - June 2021) was implemented in February 2025.
- 2.2. The recommendation 1 to Port Marine Safety Code – November 2023 has been updated in table 2 as the Marine and Coastguard Agency (MCA) has agreed to open its compliance window in January 2026.
- 2.3. The actions on the Corporate Governance and Risk Management from February 2024 have been updated in table 3.

3. Internal Audit Programme 2024/25 and 2025/26

- 3.1. Since this report to the Committee in February 2025 the of the Authority has received feedback from the Corporate Governance and Risk Management (February 2025) and from Cyber Security Audit (March 2025). Both final reports were issued with a "reasonable assurance" audit opinion.
- 3.2. The programme for 2025/26 has yet to start, further details can be found at agenda item 8 Internal Audit Strategic and Annual Plans 2025/26.

4. Corporate Governance and Risk management

- 4.1. The audit has sought to provide assurance over the following key risks: "Failure to identify and manage risks, adversely impacting on the Authority's ability to operate effectively and reputational damage and undermining of public confidence in the Authority caused by failure to meet statutory requirements in regard Members allowances and expenses".
- 4.2. The audit resulted in two important and three routine recommendations which are listed in table 4. All the recommendations have been completed.

5. Cyber Security Audit

- 5.1. This maturity assessment has focussed on the National Cyber Security Centre's revised 10 steps to Cyber Security framework that covers Cyber Risk Management, Engagement and Training, Asset Management, Architecture and Configuration, Vulnerability Management, Identity and Access Management, Data Security, Logging and Monitoring, Incident Management and Supply Chain Security.

The audit resulted in two important and seven routine recommendations which are listed in table 5. The maturing level criteria are as follows:

Yes = Fully compliant

No = Fully non-compliant

Partial = Some compliance

Author: Izabela Foley

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[Broads Plan](#) strategic objectives: All

Appendix 1 – [Summary of actions and responses to Internal Audit 2020/21](#)

Appendix 2 – [Summary of actions and responses to Internal Audit 2023/24](#)

Appendix 3 – [Summary of actions and responses to Internal Audit 2024/25](#)

Appendix 1 – Summary of actions and responses to Internal Audit 2020/21

Table 1

Port Marine Safety Code – June 2021

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
<p>3. Pilotage Finalise the arrangements for General Directions for larger vessels. This helps mitigate the risk that sufficient navigation rules are not in place and navigation of the broads is not managed as effectively and safely as required, in relation to larger vessels</p>	Important	Head of Ranger Services	<p>General Directions are rarely used by Broads Authority - most directions are 'Special'. This requirement will require legal inputs and cost benefit analysis to assess its viability. Current requirements are met using Special Directions.</p> <p>Update: Due to the lack of large vessels navigating our waters the need for a General Direction has not arisen for a number of years and if it did, we could deal with it under Special Directions. This item has been deferred to allow for a review of what is appropriate which will need specialist maritime legal advice.</p> <p>Update: The factors driving this work have changed since the paper went to committee in 31/10/2021. Updated to 28/02/2023. Updated to 31/12/2023 Audit and Risk Committee, 14 March 2023, agenda item number 12 6 Recommendations Priority rating Responsible Officer(s) BA response/action Timetable 2019, with COVID-19 and the long-term closures of</p>	<p>By 31/10/2021 Updated to 28/02/2023 Updated to 31/12/2023 Updated to 31/03/2024. Updated to 31/10/24. Updated to 31/01/2025. Updated to 20/02/2025</p> <p>This action is now complete</p>

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
			<p>bridges on the lower Yare both affecting this. Control measures remain in place to control the risk through Special Directions which can be given ahead of each vessel movement. With very limited vessel movement over the last few years the requirement to put in place a General Direction to cover all larger vessel movements is now less of a priority against other projects. The Pilotage Policy is currently being reviewed as part of the wider Safety Management System review.</p> <p>Update: Full review of Pilotage undertaken by Marico Marine. A paper was taken to Navigation committee and Broads Authority, both in January accepting recommendation that a General Direction be put in place to restrict vessel size subject to a risk assessment being carried out to determine if the vessel size subject to a risk assessment being carried out to determine if the vessel can be safely accommodated on the system. Legal advice is currently being sought on this proposal and what a general direction would need to include.</p> <p>Update: we are continuing with legal advice. A draft General Direction has been produced. Once legal advice is received the</p>	

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
			<p>general direction will need a six-month/42-day consultation period. As the Navigation Committee are one of the Statutory Consultees this will go to the meeting in Jan 2025.</p> <p>The consultation period ended 20 February 2025.</p> <p>This completed the action.</p>	

Appendix 2 – Summary of actions and responses to Internal Audit 2023/24

Table 2

Port Marine Safety Code – November 2023

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
<p>4. Review and Audit Action to be taken to ensure that an appropriate compliance statement is made by the Duty Holder when this is next required by the MCA (likely to be in March 2024). This includes ensuring that appropriate reporting mechanisms are in place in line with the recommendations above, to enable the Duty Holder to make such a statement.</p>	Important	Head of Safety Management	<p>We will contact the MCA and discuss the compliance report, the timing and format to ensure we are consistent with other PMSC duty holders.</p> <p>Update: The MCA still needs to open the window to allow compliance to be reported. RR registered with the MCA, and when the reporting window opens, will be notified and able to document the Authority's compliance with the code.</p> <p>The DfT said the new edition PMSC sits with the Minister and awaits Ministerial sign-off and is expected to be published during February or early March. The code will be renamed as the Port and Marine Facilities Safety Code to emphasise the inclusion of non-statutory harbour authority facilities into the code requirements.</p> <p>The MCA detailed the updates to the Guide to Good Practice which they suggested will align better with the structure of the revised Code and said this should be published alongside the Code. However, in terms of</p>	By 31/01/2026

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
			<p>the Duty Holder and Designated Person the key principles of the Code will remain as they currently are now.</p> <p>It is anticipated that the 2025 PMSC Compliance Exercise will be launched six months after the publication of the Code so that ports and their Duty Holder shall have time to consider the new edition Code and associated GtGP and any changes that maybe necessary to make to enhance code compliance</p> <p>Update Jul 2025 The PMSC (a Government guidance standard) has been reviewed by the Government and amended.</p> <p>The new guidance, “Port Marine & Facility, Safety Code”, came into effect in April 2025. The MCA has agreed to open its compliance window in January 2026, meaning the Authority will review the new standard, apply any changes following the Government review, take these changes through the committee structures (BSMG, Navigation Committee & Broads Authority) and report our compliance, as per the audit recommendation at the open window in Jan 2026.</p>	

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
			This open window (Jan 2026) will have been the first opportunity since the PMSC Audit, for the Authority to register our PMSC plan as compliant.	

Table 3

Corporate Governance and Risk Management – February 2024

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
<p>1. The Local Government Act 1972 Add expectations for attendance and consequences for non-attendance to the Members’ Code of Conduct.</p>	Needs Attention	Head of Governance	<p>This will be reviewed as part of the next members code of conduct update. The next review is due within the next 12 months. Governance will continue to monitor absence and notify members where they maybe in risk of breaching the 6-month rule. It will continue to be highlighted to new members via the terms and conditions.</p> <p>Update: The Code of Conduct is being reviewed by the Standards Committee on 20 February 2025. As part of the review, SGO consulted the Authority’s Monitoring Officer, and his view is that it would not be appropriate to include this in the Code of Conduct. His recommendation is that we include in the Members’ Handbook.</p> <p>SGO confirms that the Broads Authority do monitor attendances, advise members as necessary and the requirement is included in members’ appointment letters.</p> <p>Update Jul 2025 Added to the members handbook. Consequently, to be updated in the Code of Conduct at the end of 2025.</p>	By 31/12/2025

Appendix 3 – Summary of actions and responses to Internal Audit 2024/25

Table 4

Corporate Governance and Risk Management – February 2025

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
<p>1. Risk Management There is no risk appetite statement though risk appetite is mentioned in the Authority’s Capital, Treasury and Investment Strategy 2024/25.</p>	Important	Head of Governance	Appropriate wording to be added to the Risk Management Policy.	Completed 31/05/2025
<p>2. Risk Register Review format of registers as follows:</p> <ul style="list-style-type: none"> • To separate controls, assurances and gaps. • To ensure all mitigating actions have clear deadlines and ownership. • Add a target risk rating in line with risk appetite • Add links to Annual Business Plan workplans in the directorate risk registers. 	Important	Head of Governance	<ul style="list-style-type: none"> • Head of Governance will seek clarification on exactly what is being asked and then implement those measures which the Management Team agree are deemed appropriate. • This will be added. • Management Team agreed to tolerate not having a target risk rating in line with the risk appetite. • This has been discussed and agreed not to be implemented. 	Completed 31/05/2025
<p>3. Capturing and managing and monitoring risks Introduce a risk proforma, available to all staff via the intranet, for capturing new risks in a standard format for inclusion on risk registers. Add this new process to the risk policy so it is clear to staff. Add links to Annual Business Plan workplans in the directorate risk registers.</p>	Needs Attention	Head of Governance	Subsequently identified a form already exists on the BA intranet. This is already covered in the Risk Management Policy (para. 7.4) but can add reference to using the form. Management Team agreed to tolerate not having a target risk rating in line with the risk appetite. This has been discussed and agreed not to be implemented.	Completed 31/05/2025

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
<p>4. Risk Management Policy Add detail on the process for the review of low scoring, high frequency risks, and high scoring low frequency risks and closing risks to the Risk Management Policy, along with the revised processes for risk appetite, the risk register format and the new risk capture proforma and process.</p>	Needs Attention	Head of Governance	Management Team agreed to add appropriate wording to the Risk Management Policy to reflect that all risks on the Corporate Risk Register are discussed at the Risk, Audit & Governance Committee and Members have the final say on closure, removal etc.	Completed 31/05/2025
<p>5. Management arrangements Introduce greater resilience in the team that provides continuity of day-to-day co-ordination of risk management processes.</p>	Needs Attention	Head of Governance	In the absence of the Senior Governance Officer responsibility escalates to the Director of Finance and/or Management Team. The rest of the governance team will be trained in supporting the risk management process.	Completed 31/05/2025

Table 5

Cyber Security Maturity Assessment – March 2025

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
1. Engagement and Training A policy must be in place requiring all staff to receive cyber security and information security training.	Needs Attention	Head of IT	Policy will be put in place as recommended	By 30/09/2025
2. Asset Management A policy must be in place to require digital assets to be inventoried and accounted for centrally.	Needs Attention	Head of IT	Policy will be put in place as recommended	By 30/09/2025
3. Architecture and Configuration An IT Security and Network Security policy must be in place.	Needs Attention	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025
4. Vulnerability Management A policy must be in place to cover patching and updates of digital assets.	Needs Attention	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025
5. Identity and Access Management A policy must be in place to cover user authentication and access controls	Needs Attention	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025
6. Data Security A policy/plan must be in place to cover backup and recovery of data.	Needs Attention	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025
7. Logging and Monitoring A policy must be in place to cover the organisation's security logging and monitoring requirements	Needs Attention	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025

Recommendations	Priority Rating	Responsible Officer(s)	BA Response/action	Timetable
8. Supply Chain Security Regular assurance must be obtained from third parties to provide confidence in supplier's security measures and controls.	Important	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025
9. Supply Chain Security IT suppliers must be reviewed periodically to ensure that they are meeting contractual security obligations and key performance targets.	Important	Senior ICT Support Officer	Policy will be put in place as recommended	By 30/09/2025