

Internal Audit Report

Port Facility Security Plan – Annual Review

25 September 2024

PL2406

**Overall
Assessment**

**Reasonable
Assurance**

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This Internal Audit review is conducted for the City of Edinburgh Council under the auspices of the 2024/25 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2024. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Public Sector Internal Audit Standards (PSIAS) and as a result is not designed or intended to comply with any other auditing standards.

Although there are specific recommendations included in this report to strengthen internal control, it is management’s responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and elected members as appropriate.

Executive Summary

Overall
Assessment

Reasonable
Assurance

Overall opinion and summary of findings

There is a generally sound system of governance, risk management and control in place for the application of the Port Facility Security Plan (PFSP) to ensure the safety of all pier users on cruise days at Hawes Pier.



Since the last annual audit, there have been some substantial changes in the service delivery model to improve operations, enhance supplier management and to reduce key person dependencies, and the following areas of improvement will further strengthen controls and support achievement of objectives of the plan:

- some aspects of contingency and evacuation protocols outlined in the plan should be reviewed to ensure that they are clear, appropriate and understood by all
- a formal programme and supporting template documents should be developed for security drills and exercises to ensure minimum plan requirements are met and learning is captured from any issues identified
- the process for review of the PFSP should commence sufficiently in advance to ensure the plan is approved ahead of season
- document housekeeping should be improved including removal of superfluous narrative in the plan, recording actions from meetings and documenting records management procedures
- training and certification logs set up should be kept up to date, to support effective monitoring of refresher training and vetting renewal dates
- operational risk management and risk assessment processes require further refinement to ensure dynamic review of ongoing and new threats identified, and to provide assurance that all officers are aware of their responsibilities in respect of risk assessments in place.

Areas of good practice identified

- The new working arrangements enable compliance with the plan and are supported by effective escalation processes, with previous key dependency issues having been addressed through the increased numbers of Council and Security Provider PFSO (Port Facility Security Officer) qualified officers now covering a shift rota arrangement
- the four duty PFSOs worked together for the first six cruises of the season to ensure clarity and mutual understanding in their new roles and responsibilities and consistency in their approach to duties. Two officers now cover each cruise call with a handover period between shifts and a rota in place for weekend work
- additional processes have been put into place to ensure key PFSP documentation and procedures are accessible to all PFSOs and scheduled for regular review, and processes are supported by regular operational meetings. All PFSOs are encouraged to raise any issues or concerns at these meetings
- good partnership working between Council and Security Provider management and duty officers was emphasised by all officers involved in the review and evident during the audit site visit. A small group of Security Provider operatives with experience of working at the Pier have been made available throughout the current season, which has ensured consistency and familiarity with processes
- during the audit site visit, the Security Provider operatives were observed carrying out checks in line with the PFSP
- positive outcomes were also confirmed as a result of both a Department for Transport (DfT) covert test and Council led security drill undertaken earlier in the season
- evidence was also provided of online training and onsite induction briefings delivered to the security team.

Audit Assessment

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. Port Facility Security Plan Compliance			Finding 1 – Plan Compliance: Bomb Search Protocols	Medium Priority
			Finding 2 – Plan Compliance: Security Drills and Exercises	Medium Priority
			Finding 3 – Completeness of plan and supporting operational processes	Low Priority
			Finding 4 – Training and Certification Logs	Low Priority
2. Ongoing Governance, Oversight & Operational Management			See Finding 3	N/a
3. Risk Management			Finding 5 - Risk Management and Risk Assessments	Low Priority

[See Appendix 1 for Control Assessment and Assurance Definitions](#)

Management Response to Executive Summary

We welcome the findings of the audit and are grateful to Internal Audit for raising the potential compliance risks. As noted in the executive summary there has been significant changes to the service delivery model in the last 12 months which included changes to key personnel. We are committed to continuing to improve the safety and efficiency of our operations, and we will implement the agreed management actions below which will further strengthen our controls and help us meet our objectives.

Background and scope

The City of Edinburgh Council (the Council) owns, manages and maintains the Hawes Pier (the Pier) port facility in South Queensferry. Security at port facilities in the UK is governed by legislation and guidance including the [Ship and Port Facility Security Regulations \(2004\)](#) and is subject to oversight by the [Maritime Security & Resilience Division](#) of the UK government Department for Transport (DfT).

As owner of the Pier, the Council is responsible for ensuring an appropriate Port Facility Security Plan (PFSP) is in place, and that security arrangements are consistently and effectively applied in line with DfT requirements. The PFSP covers all aspects of security, is prepared and maintained by the Council using a standard DfT template, and subject to annual review and approval by the DfT. The DfT has the authority to undertake planned or unannounced visits/ inspections as they consider appropriate and require an annual independent audit of the PFSP (completed by the Council's Internal Audit team).

Cruise ship visits

The cruise ship season is principally from April to October, with 36 visits scheduled in 2024. During a ship visit, Pier users must comply with the security procedures outlined in the PFSP, as the presence of a cruise ship in the Firth of Forth may present an increased risk of a security incident. Consequently, the Pier is designated by the DfT as a Temporary Restricted Area (TRA) during such visits. The PFSP outlines the range of security measures and requirements which the DfT expect to apply at the Pier when cruise ships visit. Aspects of port security are outsourced to a third-party security provider.

New PFSO operational model

A key PFSP requirement is a designated Port Facility Security Officer (PFSO); a Council employee responsible for managing and overseeing security arrangements at the Pier on the days when cruise ships are visiting. During and prior to the 2023 season, there was only one Council PFSO in post which created a key person dependency, which was raised in the 2022 and 2023 annual internal audits. During 2023/24, a further nine Council officers have completed PFSO training, and there is now a team of four officers providing coverage at all times during cruise visits, and a further five trained managers to deal with any issues requiring escalation.

The Council's Transport Manager is the named PFSO in the plan, and the named Deputy PFSO is a Security Provider operative, who is on site during visits to supervise the team of Security Provider operatives and provide support to the team of Council PFSOs.

Scope

The objective of this annual review was to assess the adequacy of design and operating effectiveness of the key controls to ensure the PFSP content remains compliant with DfT requirements; and confirming that the security controls detailed in the plan are consistently and effectively applied.

Alignment to Risks and Business Plan Outcomes

The review also provided assurance in relation to the following Corporate Leadership Team risks:

- Health & Safety
- Resilience
- Supplier, Contractor & Partnerships Management
- Regulatory & Legislative Compliance
- Reputational Risk.

[Business Plan Outcomes:](#)

- Edinburgh has a stronger, greener, fairer economy and remains a world leading cultural capital.

Limitations of Scope

As no formal DfT compliance reviews had taken place in the current cruise season, our audit did not include a review of outcomes of such inspections.

Reporting Date

Testing was undertaken between 25 July and 30 August 2024.

Our audit work concluded on 3 September 2024 and our findings and opinion are based on the conclusion of our work as at that date.

Findings and Management Action Plan

Finding 1 – Plan Compliance: Bomb Search Protocols

Finding Rating	Medium Priority
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While two Security Provider operatives officers interviewed were able to demonstrate an understanding of their roles, responsibilities and duties for most key areas of operation, there was a lack of clarity or understanding for procedures for conducting a bomb search, which is included in a section of the plan covering contingency plans and evacuation procedures.

The plan search procedure requires a sweep of the pier, under the direction of the PFSO. When asked about this procedure, one officer noted that the security team would not undertake a search themselves, with another noting that this would be covered by patrols, however, there was a lack of certainty noted.

Risks

- **Health and Safety** - failure to identify and respond to key health and safety risks to pier users, Council officers, third party agents and the general public
- **Regulatory and Legislative Compliance** - uncertainty on plan incident requirements may result in non-compliant operations.

Recommendations and Management Action Plan: Plan Compliance - Bomb Search Protocols

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
1.1	<p>Bomb search protocols and supporting procedures should be reviewed to ensure that they provide clear instruction on what is required of the security team and to ensure compliance with the plan and DfT requirements.</p> <p>A briefing session on the bomb search protocols should be provided to all officers with refresher sessions as required.</p>	<p>Officers will be reminded of the current bomb search procedures. Bomb search protocols and supporting procedures will be reviewed before next season to ensure there are clear instructions for officers.</p> <p>A briefing session on the bomb search protocols will be provided to all officers, refresher sessions arranged as required.</p>	Executive Director of Place	Transport Manager (Lead PFSO)	31/05/2025

Finding 2 - Plan Compliance: Security Drills and Exercises

Finding Rating	Medium Priority
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A formal programme has not been established to ensure that the minimum plan requirements for security drills and exercises is met, however it is evident work is ongoing to achieve this; one security drill has taken place during the current season to date, and a table top exercise involving other pier tenants and control authorities, and a second security drill are planned for later in the season.

Brief details of drills undertaken are recorded by the Security Provider Deputy PFSO in their daily log, and outcomes of exercises undertaken are discussed at the next fortnightly PFSO debrief session held, but no formal documentation is in place outlining the approach including planning and execution. There is also no process to formally capture the outcomes of exercises undertaken, including capturing lessons learned and sharing any learning or improvement actions with Council officers, Security Provider operatives, and other pier stakeholders where appropriate.

Through discussion with officers during the site visit, it was established that learning from the last drill undertaken was that the impact of drills on other pier operations needs to be considered.

In addition, feedback provided from two Security Provider operatives during the audit site visit included the following:

- one officer was not on duty when the last drill took place and was unaware of the exercise or outcomes
- one officer noted that they were keen for more mock exercises or walkthroughs of key protocols to be undertaken on site, as a way of refreshing the team's knowledge.

A template drill record is being developed as a result of audit discussions.

Risks

- **Regulatory and Legislative compliance** - the programme for security drills and exercises may not meet minimum plan requirements.
- **Resilience** - learning from exercises undertaken is not captured and any required improvements not implemented.

Recommendations and Management Action Plan: Plan Compliance - Security Drills and Exercises

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
2.1	The approach to planning, executing and learning from security drills and exercises should be clearly documented in order to demonstrate a clear programme and compliance with the minimum requirements of the plan.	A documented approach to planning, executing and learning from security drills and exercises will be developed.	Executive Director of Place	Transport Manager (Lead PFSO)	31/05/2025

2.2	<p>Templates should be used to record the details of all drills and exercises undertaken and should include sections to capture the following:</p> <ul style="list-style-type: none"> • outcomes of drills/exercises and any learning and improvement actions determined as a result of the drill and post drill discussions • confirmation of circulation of outcomes (who and when), including other pier tenants and control authorities where appropriate • evidence that outcomes have been discussed and circulated to all Security Provider operatives, including those not on duty at the time of any drill undertaken (day or night shift) • confirmation of dates that any improvement actions were implemented and closed. 	<p>A template will be developed to record drills and exercises.</p> <p>The template will include the details of the exercise, outcomes and learning. Actions will be assigned a date and a responsible party.</p> <p>The completed document will be shared with the security provider and other key stakeholders.</p>			
2.3	<p>Consideration should be given to extending the programme to include regular refreshers of key protocols for the PFSOs and Security Provider operatives throughout the season.</p>	<p>Security Provider Managers will receive a mid-season refresher training session to ensure that key protocols and procedures are understood and passed on to security officers.</p>			

Finding 3 - Completeness of plan and supporting operational processes

Finding
Rating

Low Priority

Completeness and submission of PFSP

- As at August 2024, the section in the approved 2024 security plan detailing PFSO training and counter terrorism check (CTC) clearance is incomplete, with the CTC expiry date noted as 'TBC'. The Lead PFSO completed PFSO training in October 2023 and applied for CTC clearance however, due to DfT backlogs, the vetting process (which should be completed within eight weeks), was not complete when the plan was submitted to the DfT for approval in April 2024, and confirmation is still outstanding. It was noted that the delay does not impact the validity of plan as the DfT approved it on the basis of the named Security Provider Deputy PFSO's certification, valid to 2026. It is noted that this is not recorded as a risk in the operational risk register.
- The plan was submitted for DfT approval before the season start but not approved until after the season had started. The Lead PFSO has confirmed that the process will start earlier next year.
- Other minor housekeeping points were noted from a review of the final approved plan, which give the impression that it is still in draft, such as page headers and footers include the text 'WHEN COMPLETED', and one section headed 'Procedure for ...' highlighted in yellow and not supported by any further content. The Lead PFSO noted that a DfT template was used, and in both cases, the final version should have been updated to remove the text noted, as it was not applicable to the finalised local plan.

Document retention processes for operational paperwork

The PFSO noted during the audit site visit that completed operational logs and cruise information provided for each calling are scanned into the private PFSO MS Teams channel and securely held for 3 years. This differs from retention periods outlined in the 2024 PFSP, which states that records are held until the end of each season.

In addition, the 2024 DfT PFS instructions state that documentation should be kept for a minimum of 6 months, which is also out of step with the local plan as some documents will need to be retained for a period after the end of the season.

The data protection section of the PFSP reflects that data held will be subject to annual review, and this is supported by the written document review process which confirms that all documents are subject to review pre and post season.

PFSO certificates are retained in the PFSO MS Teams channel as evidence of completion of required training. It was noted that at least one of the certificates held includes personal information (date of birth).

Recording meeting actions

Regular PFSO team meetings and Duty PFSO debriefs are held, but no formal actions are recorded from these meetings, on the basis that they are a small team and work together to ensure any actions raised are implemented. Discussion points are bulleted in meeting invites.

Risks

• Regulatory and Legislative Compliance

- as no Council employee currently holds valid CTC clearance there is a reliance of certifications held by a third party, whose contract is ending before the start of the 2025 season
- retention periods applied to operational documents do not align to the disposal period outlined in the plan

• **Service Delivery** – there is a risk that the security plan may not be followed if it does not appear to be the final version

• **Governance and Decision Making / Service Delivery** - lack of record of actions agreed could lead to issues not being progressed or monitored at future meetings.

Recommendations and Management Action Plan: Completeness of plan and supporting operational processes

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.1	<p>Consideration should be given to raising concerns with the DfT on timescales and progress for completion of their vetting processes, to ensure that the Lead PFSO has clearance confirmed prior to the start of the next season.</p> <p>In addition, this should be recorded in the operational risk register as a live issue with a note of action being taken.</p>	<p>The issue of the lead PFSO not having a confirmed CTC clearance has now been added to the operational risk register.</p> <p>The DfT will also be contacted seeking a vetting progress update and assurance will be sought from them that the vetting process will be completed prior to the start of next season.</p>	Executive Director of Place	Transport Manager (Lead PFSO)	31/03/2025
3.2	<p>The lead in time for development of the plan for next season should be determined to ensure sufficient time for DfT review and approval prior to the start of the season.</p>	<p>The plan will be submitted to the DfT in January 2025 for review and approval, which should allow the plan to be signed-off by them prior to next season starting.</p>			31/01/2025
3.3	<p>Following annual approval, the plan should be reviewed, and any superfluous template text removed prior to roll out of the document to the PFSO team.</p> <p>Processes should be implemented to ensure that it is clear at what stage the document is at, for example, that it is clear what any highlighted text means and when it is likely to be resolved.</p> <p>The plan should be revisited periodically during the season to check that any further relevant updates are reflected prior to the next annual review.</p>	<p>Highlighted text and markup will be deleted prior to the annual submission of the plan.</p> <p>As there are multiple parties involved and helping to minimise version control confusion, only one major annual review of the plan is planned annually. All minor changes will be recorded within next seasons draft plan document.</p> <p>However, if there are any major changes during current season, these will be updated within the current year's plan and submitted to DfT for review and approval.</p>			31/01/2025

3.4	<p>The service should review the Records Management guidance provided on the Orb, where required, engage with the Information Governance Unit to understand what the records retention requirements should be and develop a register and disposal log to support the PFSP records management process. This should include the requirements for storage of records with personal data.</p> <p>If documentation is to be held for longer than the minimum requirements outlined by the DfT, the rationale for the retention period in place should be recorded as part of the records management manual developed.</p>	<p>Management have sought advice from DfT, and a 3-year retention will be implemented for all cruise related records.</p> <p>The 2025 plan will be revised to reflect this.</p> <p>A disposal log template will be created, and this will be reviewed annually.</p>			31/01/2025
3.5	<p>All training certificates should be held by management in a secure location outwith the shared PFSO MS Teams channel, and still subject to annual review post season.</p>	<p>A check will be put in place and any personal data held redacted.</p>			Closed
3.6	<p>A short action log should be completed following operational meetings and debriefs for action and reviewed at the next meeting held.</p> <p>The log should be added to the PFSO MS Teams channel, and also circulated to the Security Provider operatives supervisor where appropriate, to ensure that the team are clear on required actions.</p>	<p>A rolling actions log has been developed for actions coming from the operational meetings and debriefs. Review of the previous log will be a standing agenda item. This will be stored in the PFSO MS Teams channel and circulated to the Security Provider operatives supervisor regularly.</p>			31/03/2025

Finding 4 - Training and Certifications

Finding
Rating

Low Priority

Training logs have been set up and added to the PFSO MS Teams channel to record dates of completion of both PFSO training and CTC vetting, as well as refresher training and CTC certification renewal due dates, for all Council officers, and for the Security Provider operative named in the plan. Both logs are included in the formal document review process in place and timetabled for review twice a year, pre and post season.

At the start of the audit, no dates had been completed in either log. During the audit, completion dates were entered into the training log confirming that the Council team had all completed training between October 2023 and February 2024.

While it is acknowledged that confirmation of CTC clearance is not yet complete and subject to DfT backlogs, there is still no detail added to the CTC log to provide assurance that the vetting process is underway; no record held of dates that applications were sent to HR and then submitted to DfT for review and certification.

Risks

- **Service Delivery** - key dates are not available for monitoring and actioning refresher training requirements and lack of clarity with clearance arrangements.

Recommendations and Management Action Plan: Training and Certifications

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.1	All Officers should be reminded to keep the training and certification logs up to date to facilitate effective monitoring in line with review processes in place. The Lead PFSO should also complete a periodic review of the logs to ensure relevant training is completed, with remedial action taken as required, including checking that the vetting processes are up to date.	A reminder will be sent to all officers reinforcing that training logs are to be kept up to date. The Lead PFSO will check the logs pre and post-season and prompt officers as required where records are incomplete.	Executive Director of Place	Transport Manager (Lead PFSO)	31/03/2025

Finding 5 – Risk Management and Risk Assessments

Finding
Rating

Low Priority

Risk management processes

Operational risk management processes have been developed over the past year. The following improvement opportunities to further embed these are noted:

- potential areas of risk raised at an audit scoping meeting in early July had not been added to the local risk register when fieldwork commenced three weeks later. These were added to a version of the register soon after this
- a red rated risk for an outstanding 2022 DfT recommendation recorded in a July 2024 version of the register included a past action to meet with another pier user in May 2024 to further discuss concerns with no further updates recorded in the risk register
- during the audit scoping meeting risks related to drone activity while the TRA is in place were discussed, and a risk added to the register to reflect this. The risk was closed following circulation of Civil Aviation Authority guidance to all PFSOs, and the addition of the link and summary information from this guidance to the PFSO MS Teams channel covering the rules and authorisations required. Concerns about drones were also raised by Security Provider operatives during the audit site visit as becoming more prevalent.

Further Government maritime guidance provided by audit following the site visit recommends completion of a high-level vulnerability assessment covering threats from uncrewed aerial systems; [DfT Guidance 'Countering Drone Threats to Shipping' May 2024](#) and [NPSA Countering Threats from Uncrewed Aerial Systems: Assessing the Threat and Vulnerability](#)

- the Lead PFSO has engaged with the Council's Corporate Risk Team, and there are plans to transfer the current risk register to the corporate template.

Health and Safety Risk assessment processes

The Lead PFSO was involved in the annual review of the PFS Operations health and safety risk assessment document, however the version approved in February 2024 is unchanged from the previous year's version apart from the names of the assessors. The previous PFSO's initials are still reflected in an action 'done by' column. The Lead PFSO acknowledged that this should have been updated to reflect their initials.

All updated annual health and safety risk assessments and associated safe working methods documents are circulated to the PFSOs to read, but there is no requirement for them to acknowledge that they have refreshed their knowledge of the assessments at this time. Security Provider operatives are required to acknowledge their review of risk assessments as part of a site induction checklist signed off at the start of each season.





Risks

- **Governance and Decision Making** - lack of effective risk management framework
- **Health and Safety** - limited assurance that risk assessments are reviewed regularly, hazards identified, and further actions identified and taken.

Recommendations and Management Action Plan: Risk Management and Risk Assessments

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
5.1	There should be a dynamic review of the risk register with new and emerging risks added at the time that they are identified and progressed until resolved. With further support from the Corporate Risk Management team on best practice as required.	All risk within the Risk register will be reviewed at the cruise debrief team meetings periodically, this will be covered within the standing agenda item titled 'Risk and Health & Safety'.	Executive Director of Place	Transport Manager (Lead PFSO)	31/03/2025
5.2	Risk registers should be kept up to date and any red rated actions subject to regular review to ensure that they remain on track. It is recommended that a lead officer is assigned responsibility for keeping the register up to date. An update on the historic position for the outstanding 2022 DfT recommendation should be noted prior to the next formal review of the register in October.	All risks within the Risk register will be reviewed at the cruise debrief team meetings periodically, this will be covered within the standing agenda item of 'Risk and Health & Safety'. An update has now been added to the 2022 DfT recommendation risk within the risk register.			
5.3	In line with the government maritime guidance, an assessment should be undertaken and recorded to formally consider risks associated with drones in the TRA, and outcomes and any required actions should be noted and guidance issued to all staff, including Security Provider operatives.	A drone risk assessment has been undertaken for Hawes Pier and guidance on drones has been developed. We will ensure this is distributed to all Council officers and to Security Provider management for distribution to their operatives for awareness.			
5.4	A full review and completion of the health and safety risk assessment should be undertaken. As the health and safety risk assessment includes a number of employee and manager actions to manage and minimise risk, all relevant officers should be required to sign to confirm their understanding of these actions.	A full review and completion of the health and safety risk assessment will be undertaken and all officers will sign to confirm their understanding of these actions.			

Appendix 1 – Control Assessment and Assurance Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Overall Assurance Ratings	
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings	
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.

Appendix 2 – Areas of Audit Focus and Control Objectives

Audit Areas	Control Objectives
Port Facility Security Plan Compliance	<p>An up-to-date plan is in place which has been reviewed and approved in line with DfT templates and requirements.</p> <p>Continued operational arrangements are in place ensure compliance with the plan, including ensuring that all relevant Council employees are qualified, with relevant and valid certificates held as required, and that security drills and exercises are carried out regularly in line with plan requirements.</p> <p>Third party security staff are aware of their roles and responsibilities and are provided with adequate training to ensure compliance with their duties in accordance with the PFSP.</p> <p>Recommendations arising from DfT compliance reviews are actioned, with any outstanding issues escalated and recorded in the service risk register.</p>
Ongoing Governance, Oversight and Operational Management	<p>There are clear roles and responsibilities in place for the new PFSP operational model in place which are understood by all officers covering the rota and providing management support, to ensure compliance with regulatory duties.</p>
Risk Management	<p>Current and emerging risks related to the Port Facility are identified, recorded and managed within a service risk register, and regularly reviewed to ensure appropriate mitigating actions are in place and remain effective, with escalation to divisional and directorate level risk committees where required.</p> <p>Risk assessments undertaken for the facility are subject to regular review and shared with all officers working at the facility.</p>