

## Appendix 2

# Hereford City Centre Transport Package (HCCTP) Summary Report.

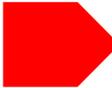
Supporting Reports include:

- Appendix 1: Objective 1 - Review of assurances and reporting provided for financial spend and budget position throughout the progression of the project to officers, members and relevant Committees by officers and members.
- Appendix 2: Objective 2 - Review of events that led to the purchase of additional land and increased costs of land.
- Appendix 3: Objective 3 - Review of events to identify the key points/events that led to the cost escalation.
- Appendix 4: Objective 4 - Review of information (reporting) provided to the LEP in regard to the achievement of deliverables and the spend of the £16m funding provided.
- Appendix 5: Objective 5 - Review of compliance with the recommendations from the Blueschool House Refurbishment investigation
- Appendix 6: Control Weaknesses and Agreed Actions

# Executive Summary

Assurance Opinion		Number of Actions	
		Priority	Number
Investigation	No opinion provided as this is an investigation.	Priority 1	1
	Key Findings outlined below.	Priority 2	8
		Priority 3	2
		Total	11

## Key Findings

	No original record of the land and costs has been identified to support the land costs outlined in the HCCTP Business Case. Limited assurance can be provided in relation to which properties resulted in increased/additional costs for the project.
	Budget monitoring across the project has demonstrated control weaknesses. Governance decisions are made in silo with limited financial information. Information presented across the Project Control Group (PCG) and Major Infrastructure Delivery Board (MIDB) regarding financial position is limited.
	Controls are needed to manage the governance around contract management and increased spend from contract award price. Although referred to as an increase in spend not overspend, the increase of the City Link Road Contract was significant and the wider impact on budget does not appear to have been considered.
	Significant weaknesses in relation to minute recording, tracking of actions from minutes, embedding of relevant documents and ensuring copies of minutes are provided to relevant parties.
	Improvements are needed to contract management processes relating to service orders and compensation events including the need to ensure service orders have sufficient coverage for compensation events appropriately. Increased scrutiny from the contract compliance team is required. The value and number of compensation events against one service order should be reviewed to ensure reasonableness of spend in line with the value of the service order.
	Governance decisions must provide clarity to ensure decision makers are fully informed prior to making decisions.
	Issues have not been escalated promptly, including the knowledge that the valuation of the property relating to claimant 23, 24 & 25 had increased significantly.

## Investigation Scope

The scope of the investigation is to review the HCCTP against the five objectives:

1. Review of assurances and reporting provided for financial spend and budget position throughout the progression of the project to officers, members and relevant Committees by officers and members.
2. Review of events that led to the purchase of additional land and increased costs of land.
3. Review of events to identify the key points/events that led to the cost escalation.
4. Review of information (reporting) provided to the LEP in regard to the achievement of deliverables and the spend of the £16m funding provided.
5. Review of compliance with the recommendations from the Blueschool House Refurbishment investigation

This investigation will cover the period between January 2012 when Cabinet approved a spend of £27 million for the relief road (city link road) and the present day. Specific references to scope of documents reviewed are contained within the reports.

Supporting this summary report are six reports. A report per objective and lastly a report summarising the findings where actions are needed to address the control weaknesses.

## Summary Conclusion

We understand that the project has spanned a number of years and is complex with nine deliverables to achieve. The original Business Case (November 2015) states in section 2.1.3: "It is Herefordshire Council's intention to implement all elements of the HCCTP package in support of the achievement of these objectives. The understanding that all nine deliverables would be achieved was agreed at the earliest date and yet each deliverable was often reported in isolation with no consideration of the impact on the achievement of the other deliverables.

The entire investigation has identified key control weaknesses, that has resulted in the HCCTP project not being able to fulfil the deliverables in the business case within the original budget. There has been missed opportunities and at times what would appear to be briefing by omission throughout the reporting, monitoring, and governance processes over the duration of the project which would have provided an earlier indication of the overspend issues prior to the eventual escalation in January 2021.

We have not been able to identify the original record of land and associated costs for the budget outlined in the business case for land acquisitions. For the purposes of this report, we have referred to this as the original record. We have identified other costings/budget figures, and these were used by officers in the budget update piece of work however we have no assurance these costs were those that were used to inform the business case. As a result of this it is not clear which properties were additional to the original scope and which had resulted in increased costs. Without this piece of evidence, it is difficult to determine at which point in the project's history that cost increases occurred and for which properties. It is imperative to ensure that a project has evidence of the budgeted costs to enable the project to be managed appropriately.

There are a number of weaknesses relating to governance including clarity within decision making reports and a lack of governance relating to increased costs from contract award. Weaknesses were identified in relation to compensation events for the City Link Road contract i.e., no record of officer decision for those over £50,000 (it is noted those under £50,000) were approved by Balfour Beatty Living Places (BBLP) as the project manager. In addition to this it was identified there was a potential concern where service orders were not set up to sufficiently cover work needed with additional compensation events then being required. In light of the previous SWAP Briefing Paper findings in relation to compensation events we would suggest increased scrutiny from the contract compliance team is required, the value and number of compensation events against one service order should be reviewed to ensure reasonableness of spend in line with the value of the service order.

The budget monitoring processes were inadequate across the entire governance structure including limited financial information within decision reports which resulted in decisions made in silo without wider consideration of the impact on the project overall budget position.

Finally, there were weaknesses across the governance structure in relation to minute taking and tracking of actions which meant assurance could not be provided that key issues were being discussed, dealt with and escalated accordingly despite a Delivery Board and Control Group in place.

In late 2019, because of control weaknesses identified in the existing oversight of the capital programme/capital project, a consultant was assigned a brief for the review and development of the capital programme. The consultant report recommended a revised new capital programme process to be introduced. The

Head of Programme Management Officer (PMO) and Programme Manager evaluated the proposal to determine its fit with Herefordshire Council requirements and consequently made revisions where appropriate. The Chief Finance Officer and Acting Chief Executive approved the new capital programme/capital projects process on 25 January 2021.

The new process was outlined to have two elements one for development and one for delivery. The delivery stage follows the existing process with new governance board structure, system templates and guidance, support and training from the PMO. A significant change is that the Corporate Project Manager will manage the spend rather than it be the responsibility of the service area. It is thought these new changes will improve the control framework and help ensure issues identified as part of this review and previous reviews do not occur again. Actions to improve the control frameworks identified as part of this review are outlined in appendix 6, where SWAP are aware of changes to process that have already been implemented e.g., corporate project management processes these have been outlined accordingly. We would suggest the respondents to the findings, ensure that where improvements to processes have already been made these are referred to in the agreed action section of the appendix 6 report.

In February 2020 SWAP Internal Audit Services completed a piece of work to provide assurance that the new Capital Programme/ Capital Projects process will provide adequate oversight to the Council with improved governance, monitoring, reporting and independent challenge of projects. The status of previously identified SWAP thematic audit recommendations and outstanding control weaknesses was considered as part of this audit. *Please note the scope of this audit reviewed specific projects as examples not all projects within the Capital Programme, further to this at the time of the audit the process was in the transition stage therefore SWAP Internal Audit Services recommended that the process be revisited once embedded.*

There are two elements of this report where improvements to the project management processes alone will not strengthen controls, and this relates to the original record of land and costs and the service order and compensation events issues raised in relation to BBLP. These issues will require liaison with the Property Services team and Contract Compliance team to ensure improvements are made.

# Full Summary

## Background and Investigation Detail

### Background

The Hereford City Centre Transport Package (HCCTP) is an integrated package of schemes & consists of the following elements:

- A new City Link Road (CLR) integrated with complementary measures to support the delivery of a major regeneration scheme.
- Improvements to the public realm and the facilities for walking, cycling and public transport modes; and
- A new Transport Hub at Hereford Railway Station.

The key objectives of the HCCTP are to support economic growth, improve accessibility and encourage active travel in line with the adopted policies of Herefordshire Council, the Marches LEP and Central Government.

### Business Case – The Financial Case

The Financial Case identified the base cost estimate for the HCCTP scheme including construction works, land purchase, statutory utilities & other cost heads to be £36.1million, with a further breakdown across different elements of the project. The business case then allows figures for risk and contingency. The Business Case outlines the Marches LEP Growth Fund contribution as £16 million.

### Capital Programme Approval.

In January 2012 Cabinet approved a spend of £27 million for the relief road (city link road) and then in December 2015 Cabinet approved a further £13.6 million for the HCCTP. This is a total budget of £40.6 million. It is noted this is £200,000 different from the business case amount as the developed package was estimated at £40.651m which reduced Herefordshire Council's contribution to £24.651m.

The objectives of the investigation are to review:

1. the assurances and the reporting provided for financial spend and budget position throughout the progression of the project from the Cabinet Key decision on 14 June 2012 to the current position today.
2. events that led to the purchase of additional land and increased costs of land.
3. events to identify the key points/events that led to the cost escalation.
4. review of information (reporting) provided to the LEP in regard to the achievement of deliverables and the spend of the £16m funding provided.
5. Review of compliance with the recommendations from the Blueschool investigation

### Project Management

The HCCTP project was not part of the new corporate project management processes and instead was being managed and run by the MIDB.

## Conclusion

A summary for each objective is outlined below with a supporting separate document for each containing the detailed findings. In addition to this Appendix 6 documents the control weaknesses with the agreed actions for relevant senior officers as well as a timescale for their completion.

### **Objective 1: Review the assurances and the reporting provided for financial spend and budget position throughout the progression of the project from the Cabinet Key decision on 14 June 2012 to the current position today.**

#### Review of documentation and other evidence

- A review of governance decisions and RoOD's has identified information relating to the financial spend and budget position is limited. The budget position of the project is primarily always referred to the entire project being within the overall budget. Further to this financial information included with dashboard presented to MIDB does not provide sufficient information to challenge budget positions.
- Financial information is reported in silo with no information regarding the wider impact on the budget.
- Decision makers are not provided with the knowledge of the entire project spend and therefore they cannot be clear what the impact of the decisions being made are on the delivery of the complete project.
- The November 2017 report lacks clarity and transparency regarding
  - the use of risk and contingency and the use of underspends in other areas of the project to fund overspends
  - known overspends within the project at the time
  - the wording of the decision to ensure it was clearly known that a large proportion of the risk and contingency had been utilised at this point.
- A review of minutes (Cabinet Member Briefings, MIDB, and PCG) shows discussions regarding budget pressures and cost increases are limited. Further to this across MIDB and PCG there is a lack of follow up and tracking of actions including escalation identified as well as key documents not being embedded within minutes and agendas.

#### Summary of fact-finding meetings with officers and councillors.

- **Officer B** stated monthly budget reports are produced by project managers (BBLP) to present to the MIDB which shows spend against budget at a granular level including a monthly forecast position, which would identify cost pressures and increases which require escalation. Although a breakdown of costs was not included in governance decisions, reporting did take place to MIDB, with costs tracked against the business case elements/breakdown. The way the Council has taken decisions has changed over the life of the project and how officers set up the risk and finance is different to what it was. Officer B was not able to confirm with confidence when Cabinet Members were made aware that there were issues with the HCCTP project budget but identified the Cabinet was briefed in 2017. Officer B accepted the wording of the 2017 decision report could have been clearer in relation to the use of the risk and contingency allowances.
- **Councillor Harrington (Cabinet Member Infrastructure and Transport)** did not receive a detailed briefing regarding HCCTP when he was newly elected and does not recall regular briefings. Recalls some conversations had with Officer A regarding LEP funding and the increased land costs approximately six months after the election. Project spend or budget position information was not provided until the January 2021 governance report. Councillor

Harrington explained that whilst he was aware the budget was not perfect, he was not aware of the further threat to the £6M remaining for the Public Realm and Transport Hub.

- **Councillor Harvey (Cabinet Member Finance)** identified members were told that there were cost pressures associated with the HCCTP which meant there was no clarity on how much of the rest of the program could be delivered within the budget. At this point Councillor Harrington was clear that he wanted the transport hub to be completed. Only in January 2021 did it become clear there was a much bigger problem.
- **Councillor Phillips, Councillor Lester and Councillor Shaw** confirmed that they were not made aware of any budget pressures regarding the financial position of the project.

## **Objective 2: Review of events that led to the purchase of additional land and increased costs of land.**

Review of documentation and other evidence:

- There is no original record of land which outlines how the £11,022,000 budget was set in the business case.
- Assurance cannot be provided as to which properties were or were not budgeted for and which have resulted in increased costs.
- The increase in the valuation of property 23 was known as early as September 2018.
- The financial aspects of purchasing additional land and the impact on the overall project budget are not as transparent as they could be. The November 2017 report although increased land costs are identified it is not fully transparent where the additional costs were and why.
- We have not been able to identify any reference to the increased land costs within the Cabinet Member Briefings reviewed to date.
- Minutes from the MIDB and PCG have demonstrated limited references to land cost increases prior to May 2019. Where there are references to some land cost increases the minutes do not provide an understanding as to how these issues developed, why these costs were not budgeted for and there is a limited audit trail on how they were followed-up and escalated in a timely manner. The issues surrounding properties 23, 24 and 15 were not raised in the MIDB minutes until 2020.
- In the PCG minutes it would appear the Council were trying to identify their position in relation to land claims, yet it took from June 2019 to January 2020 to achieve this and even then, the minutes are not clear as to what document was presented to the PCG.

Summary of fact-finding meetings with officers and councillors:

- **Officer C** was not aware of any original record of land which outlined the breakdown of the £11,022,000 land costs budget. Officer C identified that there were no significant land costs arising from land not being identified by land registry. Further to this from the retrospective valuation work Officer C completed there were a number of properties that have exceeded their perceived budget as early as 2015. Officer C has identified that the claim for property 23 was received in July 2018. However, Officer C was not made aware until early 2019 when Officer B identified this in an email. There was a delay in dealing with this claim as when it was initially received the Council's agent – Lambert Smith and Hampton identified they did not think they had the expertise to value property 23 and suggested the Council use Barber Wadlow to assist with the claim. Officer C explained that some of the interests/properties referred to in the November 2017 cabinet member decision as the properties that had incurred additional costs had already been purchased in March 2015, and others were not identified as cost increases at this point, so not clear why they were raised as increased/extra costs in November 2017.

- **Officer B** summarised the overspend of the HCCTP project is due to the increase in the land costs. Officer B highlighted that it was not anticipated the cost of property 23 would increase so significantly from the November 2017 decision report and the increased costs of this claim have largely arisen from it being a cooperative claim. Officer B identified the increased claim and additional claims relating to property 23 surfaced at the end of 2019/beginning of 2020. Officer B summarised that land costs have increased since 2015 with any increases reported at each meeting (PCG/MIDB), plot by plot, including those which had exceeded the anticipated costs. The first significant increase in costs was reported to the MIDB and updated in the 2017 report which included the land pressures of property 23. Officer B identified property 20, property 14 and property 28 were also sites where the costs were in excess of what was agreed in 2015 i./e., in the budget. There was no original record of land costs however some costs were known as some land had been purchased at the time the business case was approved. Officer B identified that the November 2017 Cabinet Member Decision Report could have been clearer, in the way the report was setting out the land outside the footprint of the highway and the value of that to the Council.
- **Councillor Harrington** summarised updates and briefings since the 2019 elections were limited and he was not made aware of any issues regarding the land costs until approximately six months after the election. Councillor Harrington was given the impression by Officer A that there was a view to 'crack on with the road'. In 2020 Councillor Harrington was told that the Council would need to spend more money on land and highlighted the issue of a potential tribunal with one claimant. Councillor Harrington was made aware a further decision paper was needed to outline the budget, how the Council will pay for the increased costs, what was left and what the next steps were. Councillor Harrington explained he did challenge how the Council would have certainty in this situation and Officer B explained that if they did not do this report, they may not be able to show that the Council was dealing with the claim and can indeed pay the claim. Councillor Harrington identified different versions of the report were presented yet the final version focused more on recalibrating the budget and less on the next steps. Councillor Harrington explained it felt like a decision needed to be made due to the potential tribunal pressures he was made aware of.
- **Councillor Harvey** explained it was not until January 2021 that Councillor Harrington was presented with a notice to make a decision to approve the CPO increased land costs. This was when members started to understand that the Council had not finished paying for the road. Members had been told it had been completed within budget although these CPO costs were sat there and had not been resolved with landowners which was biting big chunks out of the remaining budget to fund the transport hub and public realm. Prior to this in the autumn of 2020 Councillor Harvey recalls Officer A identifying that the Council were probably going to have to reign back on the ambitions for the transport hub, however at this point the administration were just saying no that cannot happen and no further detail was provided.
- **Councillor Phillips, Councillor Lester and Councillor Shaw** confirmed that they were not made aware of any land cost increases relating to the project.

### Objective 3: Review of events to identify the key points/events that led to the cost escalation.

#### City Link Road Contract

Review of documentation and other evidence:

- There is no reference to the City Link Road Contract and overspends in the decision papers, cabinet member briefings or the MIDB minutes reviewed. There is limited reference to the increased costs in the PCG minutes. We have identified some references, but none refer to the increase in cost from the tender award price.

Summary of fact-finding meetings with officers/members:

- Officer B was aware of the increased spend on the construction of the City Link Road and explained anything above the tender value would have been part of the change control process within the contracts with Contractor 1 and BBLP. In 2017 the contract spend with contractor 1 was still within the City Link Road – Construction and Utilities budget within the overall project and that the changes to the contract that take the cost above the tender price are not an overspend but an increase from the tender price within the construction and utilities budget envelope. Officer B explained that this is why these were not reported as overspend.

The Council should consider how the governance of increased costs from tender award are dealt with ensuring sufficient governance is in place to approve spend and ensure the wider impact on the project budget is considered.

### **Widemarsh Brook Diversion**

There is no reference to the Widemarsh Brook, and Attenuation Pond and increased costs identified in the Decision Papers/RoOD reviewed. Review of minutes suggests there were issues and increased costs however it is difficult to ascertain what these were, what was the outcome and finally the impact on the budget due to the limitations in the minutes reviewed.

### **Allowance of works in BBLP Service Orders**

Review of documentation and other evidence

- Two instances were identified where additional works are referred but cannot be completed due to there being no allowance within the original service order. Considering the findings that were identified in the 2020 SWAP Briefing Paper where a considerable proportion of the spend with BBLP was spent via compensation events I am concerned service orders are not being set up to appropriately to cover the works needed. Further work is needed to fully understand what the scope of the original service orders were and whether the compensation events were reasonable. However, it is clear further scrutiny is required from the contract compliance team, in liaison with project teams, in relation to compensation events.

### **Objective 4: Review of information (reporting) provided to the LEP in regard to the achievement of deliverables and the spend of the £16m funding provided.**

Review of documentation and other evidence:

- Section 3.1 of the contract would suggest that the deliverables of the business case were to be achieved.
- Monthly claim forms do not refer to the deliverables and are reporting against the outputs outlined as part of the contract.
- The LEP funding was provided based on the business case, therefore this would suggest the deliverables were to be achieved.
- The Cabinet member briefings minutes do not refer to the LEP funding until October 2020, where the increased costs of the project are highlighted along with the potential the project may not be completed as originally outlined.

- The MIDB minutes do refer to LEP funding and delays to work however it is unclear in the minutes whether this was communicated/escalated either within the Council or to the LEP and what this outcome was. In 2019 there are clear discussions as to whether the spend is in line with the HCCTP business case however again it is not clear if this has been reported/escalated to the LEP and what this outcome was.
- There is no reference of the LEP funding in the PCG minutes reviewed to date.

Summary of fact-finding meetings with officers and councillors:

- **Councillor Harrington (Cabinet Member Infrastructure)** identified he did query how the LEP funding had been spent with Officer A and asked were there any issues as there was a deadline in which the LEP funding had to be spent. Councillor Harrington was told that the Council had used the LEP funding for the City Link Road element of the HCCTP. The Council had defrayed the spend (funding) within the timeline and would then be using other funds (the Council's prudential borrowing) for the other elements of the HCCTP i.e., public realm and transport hub. In a later conversation, after he was aware of the Compulsory Purchase Order (CPO) Councillor Harrington asked Officer B and Officer A if the LEP were aware the Council had not finished paying for the City Link Road, i.e., the money was not defrayed technically if the Council had not finished paying for the land, he was told this had been squared. Councillor Harrington insisted that the LEP were made aware of the fact that the compensation payments were not completed however he explained this was not done until the third request when he raised this while Officer J and Officer K were present.
- **Officer B** identified as part of the monthly reports a summary of the delivery objectives and outputs were reported on. The objective of this investigation refers to deliverables, and these are defined in the Business Case but not in the LEP contract. Officer B highlighted that the Council are contracted to report on outputs not deliverables. Officer B explained the Council achieved the grant funding and drew down the £16,000,000 within the period stated. Any updates regarding delays to the programme would have been highlighted to the LEP. When the business case was approved in 2015 the Council had not progressed the detail of the Public Realm and Transport Hub. The LEP funding required some elements to be included and specifically the Business Case referred to a reduction in road space. MIDB was seeking clarification regarding any flexibility in the Business Case to identify whether the Council could achieve the same improvements if the administration were supportive without narrowing the road. Officer B explained that this review of flexibility was not discussed with the LEP as the discussion and task was more around reviewing the business case to establish the officer's view. During the fact-finding meeting the Officer B could not recall what the outcome of this review was. Officer B explained that based on the contract the Council did not have to spend the £16,000,000 on specific things. The Council requested drawdowns using grant drawdown notices, this was based on quarterly spend, which was predominantly on City Link Road at the time the funds were being drawn down. The Public Realm and the Transport Hub were to be funded by the Council. There were conditions on the grant funding which were set out in the contract relating to the link road, transport hub and public realm. These included needing to make improvements for pedestrians and cyclists. Officer B explained the discussions during the MIDB meetings were around what the next steps should be in view of the overspending as the costs were consuming into the transport hub and the public realm budgets. Officer B summarised that it was not unreasonable to reassess the options as time had passed since the Business Case had been approved. The MIDB was considering whether the outcomes for the Public Realm and Transport Hub could still be delivered even in the worst cost-case scenario of claimant 23. MIDB wanted to check the level of requirements in the Business Case. Officer B summarised, based on the minutes from the meeting on the 7th of January 2020 that it would appear the team were saying that specificity was not there.

### **Objective 5: Review of compliance with the recommendations from the Blueschool House Refurbishment investigation**

The review has concluded that although there are variations in the findings and agreed actions there are strong thematic findings that can be seen through the audits since and including the Blueschool House Refurbishment Investigation as follows:

- Insufficient or lack of a clear audit trail to outline how budget figures have been derived and what budget figures are based on.
- Insufficient detail and/or information to be included in governance decisions to ensure informed decision making takes place.
- A lack of robust budget monitoring and clarity on financial position.
- Poor governance in relation to compensation events and increases in costs through the tender and contract award processes.
- Insufficient recording in minutes and tracking of actions across the project governance structure, and
- Lack of escalation of key project events/issues.

### **Method and Scope**

The scope of the investigation is to review against the five objectives outlined above. This investigation will cover the period between January 2012 when Cabinet approved a spend of £27 million for the relief road (city link road) and the present day. Specific references to scope of documents reviewed are contained within the report.

The investigation included:

- Interview with relevant officers/members,
- Fact-finding meetings with relevant officers: and
- Review of relevant documentation including governance decisions, project related documents, minutes of meetings, and other evidential documentation gathered as part of the review.

For the purposes of this report we have anonymised references to officers as follows:

- Herefordshire Council officers are anonymised using Officer A through to Officer R
- Officers from contractors are anonymised using Officer 1 through to Officer 16, with their employer denoted, and
- Claimant/agencies representing claimants have been anonymised using Claimant/Agent 1 to 35 although please note in some instances these are referred to as property 1-34 depending on the context they are being discussed.

Fact finding meetings were held with:

- Officer C
- Officer B
- Councillor Elizabeth Harvey - Cabinet member - Finance, Corporate Services and Planning
- Councillor John Harrington – Cabinet member - Infrastructure and Transport

- Councillor Nigel Shaw - Chairperson of Audit and Governance committee (formerly Cabinet Member Finance)

Statements were taken from:

- Councillor Roger Phillips
- Councillor Jonathan Lester - Chairperson of General Scrutiny Committee

#### COVID-19 Restrictions

Due to the COVID-19 restrictions, all fact-finding meetings and interviews took place using video conferencing (Microsoft Teams). Both Amy Probert – Counter Fraud Investigation Officer and Bruno Lecompte – Counter Fraud Investigation Officer from SWAP Internal Audit Services were present at the meetings.

#### **Key Evidence**

A log of key evidence can be provided as necessary.

# Audit Framework and Definitions

## Categorisation of ...

In addition to the corporate risk assessment, it is important that management know how important the recommendation is to their service. Each recommendation has been given a priority rating at service level with the following definitions:

<b>Priority 1</b>	Findings that are fundamental to the integrity of the service's business processes and require the immediate attention of management.
<b>Priority 2</b>	Important findings that need to be resolved by management.
<b>Priority 3</b>	Finding that requires attention.

# Authors and Distribution

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