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## Information Commissioner's Office

### Internal Audit 2015-16: Staff Recruitment

Last updated 27 August 2015

Distribution		Timetable	
For action	Head of Organisational Development	Fieldwork completed	29 July 2015
		Draft report issued	11 August 2015
For information	Senior Corporate Governance Manager	Management comments	26 August 2015
	Audit Committee	Final report issued	27 August 2015

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## Glossary

- 1** The following terms are used in this report:
- 4** DRIPA – Data Retention and Investigatory Powers Act
- ICO – Information Commissioner's Office
- L&D – Learning and Development
- R&S – Recruitment and Selection

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It is the responsibility solely of the ICO management to ensure that there are adequate arrangements in place in relation to risk management, governance and control.

# 1 Executive Summary

## 1.1 Background

As part of the internal audit plan for 2015-16, it was agreed with the Audit Committee that we would undertake an internal audit of the ICO's staff recruitment arrangements.

In 2014-15, the total number of FTE roles in the ICO was 383 (consisting of 353.5 FTE staff and 29.5 vacancies); in 2015-16 the number is forecast to be 415 FTE (363.7 STE staff and 51.3 vacancies).

The recruitment of high quality staff is vital to the success of the ICO in delivering its objectives and providing an efficient and effective service to its customers and stakeholders. The staff cohort for the year is defined for each department by the Finance Team and Organisational Development based upon the ICO's income expected from government grant funding, Data Protection and DRIPA (Data Retention and Investigatory Powers Act) fees. Vacancies are then identified by each department based upon their budgeted cohort and operational objectives.

Following the development of the Finance Steering Group, a reporting framework is in place to monitor the performance of each department against the agreed budget and a defined process is in place for individual recruitment exercises to take place.

The objective of our review was to establish how staffing requirements are determined, the process to identify candidates, the selection process, and the preparation for new starters and how that meets the ICO requirements.

## 1.2 Scope

Our review involved an assessment of the following risks:

- The ICO may not suitably evaluate and approve vacancies and associated job specifications prior to inviting applications, resulting in the operation of an inefficient and costly recruitment process;
- Candidates may not be evaluated against the approved job specification and criteria and may not be subject to references, security and qualification checks as appropriate, resulting in a failure to demonstrate the appointment of the most suitable and qualified candidate for each role;
- The ICO may not operate a robust approach to authorising all recruitment and appointments resulting in a failure to control staffing costs, advertising and recruitment charges;
- The ICO may not provide appropriate support to managers involved in the recruitment process resulting in reputation damage and/or the recruitment of unsatisfactory applicants to vacancies through poorly delivered interviews and assessments;
- The ICO may not adequately monitor its recruitment activities resulting in a failure to manage vacancies and appointments and the associated adverse impact on costs.

Further details on responsibilities, approach and scope are included in Appendix A.

### 1.3 Overall assessment

We have made an overall assessment of our findings as:

Overall assessment	
Following agreement of the nature and significance of individual issues with management, in our view this report contains matters which require the attention of management to resolve and report on progress in line with current follow up processes.	<b>Amber</b>

Please refer to Appendix B for further information regarding our overall assessment and audit finding ratings.

### 1.4 Key findings

Risk / Process	High	Medium	Low	Imp
Evaluating and Approving Vacancies	-	1	1	-
Evaluation of Candidates	-	-	2	-
Authorisation of Recruitment and Appointments	-	-	-	-
Management Support	-	1	1	1
Monitoring Recruitment Activity	-	1	1	1
<b>Total</b>	-	<b>3</b>	<b>5</b>	<b>2</b>

The following findings are assessed as Medium:

- The ICO does not currently have a recruitment, selection and retention strategy in place to support the corporate objective of 'delivering an efficient, effective service'. While the recruitment and selection policy and procedures provide details of the objectives of the recruitment process at a high level, we would expect Organisational Development to develop a clear roadmap that build on these and:
  - Outlines what is expected from the recruitment and selection process (for example improving the strength of the ICO through the addition of new skills and experience); and
  - Describes the method by which this will be achieved, the tools, applications and partners that will enable this from the initial

identification of a resource need through to induction and on-boarding, and the method by which it will be reported.

- The ICO provides each member of staff who is involved in shortlisting and interviewing candidates either with classroom training or one-to-one support in order to provide them with the skills necessary to effectively conduct the recruitment. Our review of the training packs noted that, while there is reference to scoring principles in the recruitment policy, there is no guidance for scoring candidates against prepared criteria or competencies. We would expect to find standard guidance to be in place to enable the objective assessment of candidates and for refresher training provided every 18 to 24 months to provide assurance that quality and consistency of the interview process is maintained between panel members;
- Information on headcount, vacancies and staffing budgets is provided to budget holders on a monthly basis and reporting on staff recruitment, turnover and retention is completed annually to the Leadership Committee and Management Board. None of the reports currently produced for these stakeholders contain any information on the performance and efficiency of the recruitment process nor do they monitor the recruitment pipeline. We would expect recruitment activity to be part of any regular management information, allowing vacancy advertising campaigns, the use of agencies and the end-to-end recruitment process to be assessed for effectiveness or value for money.

Further details of our findings and recommendations are provided in Section 2.

### 1.5 Basis of preparation

We identified the following controls in place during our audit:

- The recruitment cohort is defined for the year ahead by management and then devolved to departments for the heads to monitor and control locally;

- Salary offers are pre-determined using entry rates to salary bands. Where market demands require that different rates are offered, these must be authorised by the Head of Organisational development and reported on an annual basis to the Remuneration Committee;
- Recruitment training must have been completed before eligible to sit on an interview panel.
- Security checks are performed before making an offer of employment unconditional.

### 1.6 Elsewhere in the sector

We detail below other ways of working and commonly occurring issues that we have experienced during similar types of reviews for other public bodies. The following does not necessarily purport to be good practice but is included for your information and consideration:

- Other bodies will record and manage candidate details on a third party application or database. All tracking of references or security clearance for vacancies is therefore managed automatically. Information and reporting on areas such as the timeliness of communications, candidate assessment scoring, use of agents and cost per vacancy may then be produced automatically, rather than collated via spreadsheets:
- To improve the efficiency of recruitment and selection, improve workforce diversity and reduce agency costs, during the application period, other companies will include an internal candidate search via social media platforms such as LinkedIn or professional portals such as Reed or Monster to identify available candidates that meet the vacancy criteria.

### 1.7 Acknowledgement

We would like to take this opportunity to thank the staff involved for their co-operation during this internal audit.

## 2 Detailed Findings

### 2.1 The ICO may not suitably evaluate or approve vacancies and associated job specifications prior to inviting applications

1.	Medium	Recruitment strategy
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Finding and Implication	Proposed action	Agreed action (Date / Ownership)
<p>The ICO has a Corporate Plan for the period 2015-18 that describes its goals, vision and mission and objectives. Underpinning each objective are a number of activities to be completed during the period. One of these enabling activities is to complete the development of a People Strategy to clarify the competitiveness of pay and grading at the ICO by 2015, developing people for senior roles, identifying better ways of working and reviewing policies on recruitment and retention.</p> <p>Whilst the development of this Strategy is underway, plans to develop the recruitment and retention strand do not include the development of a recruitment strategy that builds upon the Recruitment and Selection policy and procedure clearly outlining how and when recruitment will take place.</p> <p>Without a clear strategy to drive recruitment action forward, there is a risk that the ICO may not operate an effective recruitment process, failing to engage with agents and partners, achieve best value for money and operate a fair and transparent selection process.</p>	<p>To build on the objectives set out in the Recruitment and Selection Policy and Procedures, Organisational Development should develop and agree a recruitment strategy that describes:</p> <ul style="list-style-type: none"> <li>• The objectives of the recruitment and selection process (for example the need for new strategic skills or skills to enable the ICO to develop following the introduction of new legislation or operational requirements);</li> <li>• The structure of the Recruitment team and their respective responsibilities, and those of the recruiting department;</li> <li>• Supporting application systems and processes;</li> <li>• The recruitment channels and sourcing strategies that will be used to source candidates according to the needs of the ICO;</li> <li>• Shortlisting strategies;</li> <li>• The assessment and selection framework and how it supports the ICO's recruitment requirements;</li> <li>• Effective on-boarding and induction;</li> <li>• Tracking and engaging with leavers with a view to potential future re-engagement.</li> </ul>	<p><i>The ICO will develop a People Strategy to set out the approach to managing, developing and supporting the organisations people.</i></p> <p><i>One strand of this will be the development of a Recruitment and Selection Strategy to elaborate on the details set out in the R&amp;S Policy.</i></p> <p><i>This will also set out known recruitment plans for the coming period (12-18 months).</i></p> <p><i>Date Effective:</i></p> <p><i>People Strategy October 2015</i></p> <p><i>Recruitment Strategy March 2016</i></p> <p><i>Owner: Mike Collins</i></p>

2.	Low	Reviewing and authorising vacancies
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Finding and Implication	Proposed action	Agreed action (Date / Ownership)
<p>Vacancies are reviewed and authorised in two distinct ways:</p> <ul style="list-style-type: none"> <li>For new vacancies within a department, a business case must be completed by the Head of Department, submitted and reviewed by the Executive Team and graded by the job grading panel before recruitment can commence;</li> <li>For recruitment of replacement roles, the vacancy is reviewed by the Head of Organisational Development prior to recruitment taking place.</li> </ul> <p>As part of our review, we selected six separate posts for which a candidate had been successfully recruited. Whilst we confirmed that all had been reviewed and agreed by the relevant authoriser, our review of the process noted that:</p> <ul style="list-style-type: none"> <li>For replacement roles, whilst the Head of Organisational Development reviews the current FTE budget, there is no evaluation as to whether the vacancy is still required by the department in which it has been identified, nor of whether the cost of the FTE could be better used in another area of the ICO;</li> <li>Executive approval for roles takes place prior to the job being evaluated by the grading panel. Although the approximate grade of a role will already be known by the Executive, the body as a whole does not have a clear or accurate view of the total cost of a post prior to the role being agreed.</li> </ul> <p>Therefore, there is a risk that the ICO is evaluating FTE vacancies without all available operational information being provided prior to inviting applications, increasing operational costs and reducing overall departmental effectiveness.</p>	<ul style="list-style-type: none"> <li>In evaluating replacement posts, the Head of Department should complete and submit a business case that details the continued need for the post in their area to be considered as part of the sign off of the recruitment request by the Head of Organisational Development.</li> <li>When submitting new posts for evaluation, a minimum, maximum and average wage band (and all other supporting costs) should be provided to the Executive Committee to enable them to make a fully informed decision as to the maximum potential cost of the new role.</li> </ul>	<p><i>Staff Requisition forms to be updated to require Departmental Heads to elaborate on the need for a replacement post and confirm if alternative options were considered.</i></p> <p><i>A new procedure for the creation and implementation of new posts to be developed which incorporates the job grading process. This will require the provision of information about the cost of posts.</i></p> <p><i>Date Effective: March 2016</i></p> <p><i>Owner: Mike Collins and HR team.</i></p> <p><i>New process to be developed by Mike Collins and agreed with Job Grading panel and Leadership Group.</i></p>

**2.2 Candidates may not be evaluated against approved job criteria or subject to appropriate reference checks**

<b>3.</b>	<b>Low</b>	<b>Screening and pre-shortlisting</b>
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Finding and Implication	Proposed action	Agreed action (Date / Ownership)
<p>The ICO does not operate a screening process of applications prior to the review by panel members. Consequently the shortlisting process is very manually intensive as a member of the recruitment team must collate all applications received from a recruitment advert, remove all personal details from the electronic copy of the application form and print a physical copy for each member of the panel to review.</p> <p>In operating the shortlisting process in this manner, the ICO is not making the best use of its resource in terms of both the recruitment team performing the application administration and for panel members reviewing large numbers of applications for the shortlist.</p>	<p>In order to reduce the number of candidates being passed to shortlisting, Organisation Development should implement a 'screening' step (for example, a set of online questions, a review against the criteria for the role, or a short candidate exercise) into the recruitment process.</p> <p>In addition, to improve the efficiency of the shortlisting process, the manner in which the shortlisting process operates should be reviewed. PDF documents should be used to remove candidates' personal information from experience and CV details and electronic storage and collation should be used rather than physical copies printed for each shortlisting panel member.</p>	<p><i>Work with managers to develop a process for screening out obviously unsuitable applications before submission to shortlisting managers where there are high numbers of applications received. Amend R&amp;S procedures accordingly.</i></p> <p><i>Date Effective: March 2016</i></p> <p><i>Owner: Mike Collins and HR team</i></p>

<b>4.</b>	<b>Low</b>	<b>Managing references and pre-employment checks</b>
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Finding and Implication	Proposed action	Agreed action ( <i>Date / Ownership</i> )
<p>Once a provisional job offer is made, the 'Right to Work' (RTW) spreadsheet, along with individual employee checklists, is used by the recruitment team to track applicants through the process of obtaining references and completing pre-employment criminal records and health checks. These documents also provide assurance that all documents required by the ICO have been verified before making an unconditional offer of employment.</p> <p>As part of our fieldwork, we reviewed a total of six applicant files to confirm that all required documentation had been received prior to an unconditional offer being made. Whilst we confirmed that in each instance, all information and checks were recorded within the applicant's physical file and on the employee checklist, the RTW spreadsheet was incomplete.</p> <p>In not maintaining complete information on each recruitment, there is a risk that either an offer may be made to a candidate without subject to references, security and qualification checks being made, or checks may be requested more than once impacting upon the effectiveness of the process.</p>	<p>To provide assurance that each recruitment is proceeding in a timely manner, and all documentation has been requested (or received), the recruitment and selection team should complete each section of the 'Right to Work' spreadsheet once the relevant step has been concluded.</p>	<p><i>Reminder for team to complete all aspects of the spreadsheet and management to complete periodic audits of them.</i></p> <p><i>Date Effective: September 2015</i></p> <p><i>Owner: Mike Collins</i></p>

**2.3 The ICO may not provide appropriate support to managers involved in the recruitment process**

<b>5.</b>	<b>Medium</b>	<b>Interviewing training and guidance</b>
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Finding and Implication	Proposed action	Agreed action (Date / Ownership)
<p>Recruitment and selection training takes the form of either a full day classroom session or a shorter personal one-to-one meeting between the trainer and the recruiting manager. These sessions are mandatory for all members of staff who may be involved in shortlisting and interviewing and covers elements such as how to shortlist and managing diversity.</p> <p>From our testing of applicant files, a total of fourteen separate individuals had been used to complete the interview panels, and we were able to confirm that all had either received formal training or a one to one session.</p> <p>As part of the recruitment and selection training or recruitment process advice, there is however no guidance to direct panel members in scoring candidates against the prepared criteria or competencies.</p> <p>There is a risk that the lack of transparent candidate scoring may result in the ICO being unable to objectively refute challenges from unsuccessful candidates who dispute the outcome of the selection process.</p>	<p>One to one recruitment and selection training should include a specific section on competency-based interviewing, covering how candidate answers should be assessed and how scoring may be effectively supported by evidence should a review of interview notes or the selection process be required.</p>	<p><i>One to one briefing sessions to include competency based interviews and guidance on assessing the quality of responses.</i></p> <p><i>Date Effective: September 2015</i></p> <p><i>Owner: Mike Collins, HR Team and L&amp;D team</i></p>

<b>6.</b>	<b>Improvement</b>	<b>Confirmation of successful training</b>
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Finding and Implication	Proposed action	Agreed action ( <i>Date / Ownership</i> )
<p>Once an individual has attended the recruitment and selection training, they can take part in the shortlisting and interviewing process.</p> <p>However, the one to one training sessions do not involve a test to confirm that the individual has gained the necessary interviewing skills and knowledge for the ICO to be comfortable that they can conduct interviews effectively.</p> <p>There is a risk that without assurance that the panel members have reached an acceptable level of competence in recruitment techniques, the interviews and selection panels may not be delivered effectively, resulting in reputational damage and/or the recruitment of unsatisfactory applicants to vacancies.</p>	<p>To provide additional rigour to the recruitment training process, as part of each one to one training session, each individual should be formally assessed by the training provider who should confirm that they have reached an acceptable standard and have gained the necessary skills to conduct interviews effectively.</p>	<p><i>One to one briefing sessions will give managers the opportunity to undertake a practice interview with the training provider or another individual</i></p> <p><i>Date Effective: September 2015</i></p> <p><i>Owner: Mike Collins, HR Team, L&amp;D team</i></p>

<b>7.</b>	<b>Low</b>	<b>Refresher training</b>
<b>Finding and Implication</b>	<b>Proposed action</b>	<b>Agreed action (Date / Ownership)</b>
<p>Following initial recruitment and selection training, panel members are not invited to attend sessions to refresh skills or provide updates on the latest recruitment legislation.</p> <p>There is a risk that without up to date training covering the application of the latest legislation and the method by which the ICO undertakes candidate selection, interviews and selection panels may not be delivered effectively, resulting in reputational damage and/or the recruitment of unsatisfactory applicants to vacancies.</p>	<p>Organisational Development should review the policy for recruitment and selection training with Learning and Development and develop a mandatory refresher training for all relevant personnel. Held upon the release of legislation that impacts upon recruitment, this training should provide all interviewers with the most recent legislation, as well as further developing interviewer skills.</p>	<p><i>Places on recruitment training sessions to be available to experience recruiters. Managers to be updated with changes to law affecting recruitment.</i></p> <p><i>Annual and mandated refresher training for all managers involved in recruitment is unlikely to be a proportionate responses. HR team member involved in recruitment panels to remind selection panel of their obligations, processes and legal aspects to recruitment by way of a refresher.</i></p> <p><i>Date Effective: September 2015</i></p> <p><i>Owner: Mike Collins and HR team.</i></p>

**2.4 The ICO may not adequately monitor its recruitment activities**

<b>8.</b>	<b>Medium</b>	<b>Management information development</b>
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Finding and Implication	Proposed action	Agreed action ( <i>Date / Ownership</i> )
<p>Information on headcount, vacancies and staffing budgets has been developed by Finance and is reported through the Finance Steering Group and budget holders on a monthly basis to allow them to monitor their real-time staff FTE count in line with their monthly salary budget vs expenditure.</p> <p>Reporting on staff recruitment, turnover and retention is completed annually to the Leadership Committee and Management Board by the Head of Organisational Development.</p> <p>Whilst the Recruitment and Selection team collect and retain data on the recruitment process, none of the reports currently produced for management stakeholders contain any information on the performance, efficiency and effectiveness of the recruitment process. There is also no formal reporting in place with regard to pipeline monitoring or benchmarking/review of each method of recruitment.</p> <p>Without this information, there is a risk that recruitment activities (for example use of agencies or advertising in recruitment) may not be operating effectively and resulting in an inefficient use of ICO resources.</p>	<p>Using information that is already available or collated by the recruitment team, a recruitment and selection dashboard should be developed for reporting to the Leadership Committee and Management Board.</p> <p>This dashboard should contain additional information on:</p> <ul style="list-style-type: none"> <li>• The number of open vacancies, number advertised/under way, number filled to date/during the year;</li> <li>• HR advisor workload (staff utilisation);</li> <li>• Reporting on the recruitment cycle (average time for each stage of a recruitment to complete, from date of advert to shortlisting, interview completion, offer made/accepted and post filled);</li> <li>• Average cost per recruitment (divided into internal recruitments, external recruitments and agency referrals).</li> </ul>	<p><i>Information to be collated for management board and for Leadership Group to be provided each quarter.</i></p> <p><i>Date Effective: October 2015 (next Management Board)</i></p> <p><i>Owner: Mike Collins and HR team</i></p>

<b>9.</b>	<b>Low</b>	<b>Monitoring retention and recruitment 'lessons learned'</b>
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Finding and Implication	Proposed action	Agreed action ( <i>Date / Ownership</i> )
<p>All leavers from the ICO are interviewed as part of the exit process. Reasons for leaving are noted and collated to identify possible trends. This information, together with the retention and attrition data, is collated and reported annually to the Management Board and Leadership Committee by the Head of Organisational Development as part of the Organisational Development dashboard.</p> <p>Of the 39 staff that left in 2014/15, 4 left in the first year of service, with 2 of these due to probation failures. Whilst the ICO does collate reasons for leaving, it is not fed into a recruitment 'lessons learned' to inform hiring managers and the training provided in order to improve future staff recruitment.</p> <p>In not considering information on unsuitable candidates or those that stay under a year as a formal part of the recruitment process, there is a risk that opportunities to improve the recruitment process or the interviewing skills of individual managers may be missed. The ICO may continue to be employ unsuitable candidates, ultimately increasing recruitment costs and affecting the service provided to ICO customers.</p>	<p>As part of the monitoring of retention rates, Organisational Development should review each leaver who completes less than one year of service. This review should make reference to the recruitment and selection process that resulted in their appointment, including an objective assessment of individual recruiting managers to understand whether there may be a need to provide additional training to individuals. Any lessons that may be gained from this review should then be fed back to interviewing managers and incorporated into the recruitment and selection training.</p>	<p><i>Feedback to be obtained from recruiting managers and the team managers to gauge the effectiveness of those recruited.</i></p> <p><i>Reported back to recruiting panels for consideration in future exercises.</i></p> <p><i>Date Effective: December 2015</i></p> <p><i>Owner: Mike Collins and HR team</i></p>

<b>10.</b>	<b>Improvement</b>	<b>Recruitment satisfaction surveys</b>
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Finding and Implication	Proposed action	Agreed action ( <i>Date / Ownership</i> )
<p>Following an offer being accepted by a candidate, the recruitment team do not approach individuals (either successful or unsuccessful) for feedback on the recruitment methods applied. No independent assurance is therefore gained by the team that the process meets the expectations and needs of those that are applying (for example, application turnaround times, communication, arranging interviews or assessment completion).</p> <p>Without regular feedback of the process from those directly involved, there is a risk that the process may not be engaging and may discourage the most suitable and qualified applicants, ultimately resulting in the ICO not appointing the best person for each role.</p>	<p>The recruitment and selection team should develop a 'customer satisfaction' survey that requests candidate feedback on areas such as timeliness and effectiveness of communication and the interview process.</p> <p>Upon completion of a recruitment cycle, this survey should be sent to the successful candidate and if appropriate a sample of candidates that also attended the interview process.</p> <p>Survey results should then be collated by the recruitment team and reported as part of the 'recruitment dashboard' with any areas noted as requiring improvement flagged for action.</p>	<p><i>We will explore this as part of our review of the recruitment process as a whole.</i></p> <p><i>Date Effective: March 2016</i></p> <p><i>Owner: Mike Collins</i></p>

## A Internal audit approach

### Approach

Our role as internal auditor to a Public Body is to provide an independent and objective opinion to the Accounting Officer on risk management, control and governance processes, by measuring and evaluating their effectiveness in achieving the organisation's agreed strategic objectives.

Our audit was carried out in accordance with the guidance contained within the Government's Internal Audit Standards (2013) and the Auditing Practices Board's 'Guidance for Internal Auditors'. We also had regard to the Institute of Internal Auditors' guidance on risk based internal auditing (2005). In addition, we comply in all material respects with other Government guidance applicable to Public Bodies and have had regard to the HM Treasury guidelines on effective risk management (the 'Orange Book').

As part of the internal audit plan for 2015-16, we agreed with the Audit Committee and management that we should carry out a review of the ICO's staff recruitment arrangements, to further inform our on-going understanding of the ICO's key internal control activities.

Our aim in completing this audit was to ensure that the ICO has appropriate arrangements in place to identify, manage and report on risk.

We achieved our audit objectives by:

- meeting with key staff to gain an understanding of the arrangements in place to manage the recruitment process and measure performance and quality of delivery of recruitment services to the ICO;
- identifying the key risks to these arrangements and evaluating the management controls that mitigate these risks; and
- reviewing key documents that support the above processes.

The findings and conclusions from this review will support our annual opinion to the Audit Committee on the adequacy and effectiveness of internal control arrangements.

### Responsibilities

The Information Commissioner acts through his Board of Management and the Information Commissioner's Office ("ICO") discharges his obligations. Therefore references to the Information Commissioner and the ICO in this report relate to one and the same party.

It is the responsibility of the Information Commissioner to ensure that the ICO has adequate and effective risk management, control and governance processes.

HM Treasury's Corporate Governance in Central Government Departments (2011) states that boards of Public Bodies should determine the nature and extent of the significant risks it is willing to take in

achieving its strategic objectives. The Board should therefore maintain sound risk management and internal control systems and should establish formal and transparent arrangements for considering how they should apply the corporate reporting and risk management and internal control principles and for maintaining an appropriate relationship with the organisation's auditors.

Please refer to our letter of engagement for full details of responsibilities and other terms and conditions.

### Scope

Our review involved an assessment of the following risks:

- The ICO may not suitably evaluate and approve vacancies and associated job specifications prior to inviting applications;
- Candidates may not be evaluated against the approved job specification and criteria and may not be subject to references, security and qualification checks as appropriate;
- The ICO may not operate a robust approach to authorising all recruitment and appointments;
- The ICO may not provide appropriate support to managers involved in the recruitment process;
- The ICO may not adequately monitor its recruitment activities.

### Additional information

#### Client staff

The following staff were consulted as part of this review:

- Michael Collins – Head of Organisational Development
- Stephen Eckersley – Head of Enforcement
- Katy Hulme – HR Manager
- Sally Gozem – HR Assistant

### Documents received

The following documents were received during the course of this audit:

- Employee Personnel File Checklist
- New Vacancy Checklist
- Log of SR1 Forms & Resignations 2015-04 to 2016-03
- Right to work – Clearance Spreadsheet
- Recruitment EOM Analysis by campaign 2014-15
- Notes for shortlisting panel
- Candidate spreadsheet – Senior Policy Officer SL – May 15
- Finance Steering Group Agenda, Friday 12 June
- Finance Steering Group Agenda, Thursday 9 July
- Management Report, Human Resources
- ICO Recruitment & Selection Training Notes
- ICO Recruitment & Selection Training Agenda, Thursday 9 July

### Locations

We visited The Information Commissioner's Office, Wilmslow for this review.

## B Definition of overall assessment internal audit ratings

### Overall assessment

Rating	Description
Red	Following agreement of the nature and significance of individual issues with management, in our view this report contains matters which should be raised with Senior Management and the Audit Committee at the earliest opportunity.
Amber	Following agreement of the nature and significance of individual issues with management, in our view this report contains matters which require the attention of management to resolve and report on progress in line with current follow up processes.
Green	We have identified matters which, if resolved, will help management fulfil their responsibility to maintain a robust system of internal control.

### Audit issue rating

Within each report, every audit issue is given a rating. This is summarised in the table below.

Rating	Description	Features
High	Findings that are fundamental to the management of risk in the business area, representing a weakness in control that requires the immediate attention of management	<ul style="list-style-type: none"> <li>Key control not designed or operating effectively</li> <li>Potential for fraud identified</li> <li>Non compliance with key procedures / standards</li> <li>Non compliance with regulation</li> </ul>
Medium	Important findings that are to be resolved by line management.	<ul style="list-style-type: none"> <li>Impact is contained within the department and compensating controls would detect errors</li> <li>Possibility for fraud exists</li> <li>Control failures identified but not in key controls</li> <li>Non compliance with procedures / standards (but not resulting in key control failure)</li> </ul>
Low	Findings that identify non-compliance with established procedures.	<ul style="list-style-type: none"> <li>Minor control weakness</li> <li>Minor non compliance with procedures / standards</li> </ul>
Improvement	Items requiring no action but which may be of interest to management or best practice advice	<ul style="list-style-type: none"> <li>Information for department management</li> <li>Control operating but not necessarily in accordance with best practice</li> </ul>



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