

Aberdeen Sports Village (ASV)

Sector	Sport and Leisure
Level of ACC Control	Joint Venture with the University of Aberdeen
ACC Funding 2018-19	£919,200
Function	Commissioning

The Hub requested assurance in the following areas:-

1. Governance

1.1 Assurance on existing approach towards Data Protection – Aberdeen Sports Village (ASV) appended a copy of its Data Protection and Information Security Policy which had been reviewed in October 2017 in light of GDPR coming into effect.

1.2 Assurance on General Data Protection Regulation (GDPR) preparations – ASV advised that they had been working closely with the University of Aberdeen Data Protection Officer in preparation for GDPR compliance. The following timetable has been developed:

- September 2017 - Engagement with University of Aberdeen Data Protection Officer (DPO)
- October 2017 - Briefing presentation delivered to ASV Performance Management Team (PMT) by DPO
- October 2017 - Information requested of PMT with regards to those areas which required to be considered as part of the Gap Analysis exercise
- December 2017 - Areas identified, collated and passed to DPO for review
- January 2018 – Information discussed with DPO
- February-March 2018 – Audit performed by DPO
- April 2018 – GDPR Implementation Action Plan produced

ASV confirmed that they remain on track to meet the above timetable. They are currently working with the DPO to identify suitable dates in February and March 2018 to audit each area.

1.3 Assurance on GDPR training – ASV advised that the Performance Team tasked with GDPR implementation had received training from the University of Aberdeen’s Data Protection Officer and was due to receive GDPR training from the Council’s IT and Transformation Service on 5 March 2018.

1.4 Assurance on GDPR readiness – ASV had been utilising the services of the University DPO to initially brief the Management team and secondly conduct a gap analysis which would allow ASV to prepare a detailed Action Plan to ensure its compliance with GDPR. In terms of resources and capacity, this would be determined once the Action Plan had been produced and discussed with the Board.

Governance Assessment – The Hub received legal advice that ASV’s existing Data Protection Policy and Information Security Policy were satisfactory and provided a good benchmark for implementing GDPR. The Hub took comfort from ASV’s receipt of training and support from the University of Aberdeen’s Data Protection Officer to help them prepare for GDPR and was assured that ASV had taken into account the processes and resources required to ensure compliance. The Hub welcomed that GDPR had been appropriately rated on ASV’s risk register.

The Hub agreed that due to the administrative and regulatory demands of implementing GDPR which would involve significant systematic and procedural change; in addition to the higher costs and risks of a data breach, it was felt that a **Medium Risk** rating was the best score it could assign to any organisation (including the Council) but highlighted that this risk may reduce for ASV once GDPR systems, processes and practice became embedded. As such the Hub was as assured as it could be that ASV had readied the organisation appropriately for GDPR implementation and had adequately mitigated risk to the Council.

2. Risk Management

2.1 Assurance on Risk Controls (Mitigation) – ASV appended its risk register which had been presented to the Board meeting in December 2017. The register identified business risks, controls and residual risk ratings. The biggest risks following mitigation for ASV were reductions in partner funding and a lack of capital investment from shareholders.

2.2 Assurance on Business Continuity Planning – ASV attached three documents to provide assurance on business continuity planning:

- Critical incident management procedure
- Business Continuity Management procedure
- IT systems continuity plan

ASV's explained that their Business Continuity Plan (BCP) would be reviewed by the Board in June 2018 and would adopt elements of the Council's BCP template which had recently been provided to ASV.

To provide further assurance, ASV confirmed that a full suite of normal operating procedures (NOP) and emergency action plans (EAP) were now in place and had been reviewed.

2.3 Assurance that the Board takes risk into account at Board meetings – ASV attached a presentation that the Board received in September 2017 which set out ASV's approach towards risk management. ASV also appended a Board report from December 2017 which provided a summary of the risk register and outlined the approach taken by the senior management team to identify, measure and mitigate risk; and detailed levels of responsibility within the organisation in the management of business risk. The report also compared the top ten ASV business risks with the top ten UK business risks.

Risk Management Assessment – The Hub welcomed ASV's provision of a robust suite of documents relating to risk management and noted that ASV was in the process of preparing a Business Continuity Plan (BCP) based on the Council's template which would be submitted to the Board in June. The Hub agreed to request the approved BCP ahead of its next meeting as well as a copy of ASV's service level agreement (SLA) with the University of Aberdeen relating to IT support as this would provide additional assurance on ASV processes for continuing to operate in the event of significant disruption and how they would return to business as usual. The Hub assessed ASV's risk register to be robust, as suitable risks had been identified and appropriate controls were in place to mitigate risk. The Hub was also satisfied that the ASV Board discussed risk prior to decision making as ASV had provided Board papers and minutes to evidence this approach.

Overall, based on the assurance provided, ASV's risk management approach was assessed as **Low Risk**.

3. Financial Management

3.1 Assurance on Management Trading Accounts – ASV provided its set of Management Trading Accounts as at 31 December 2017.

3.2 Assurance on Audited Annual Accounts – ASV provided its audited annual accounts 2016-17 and External Auditor's report to the Board. The accounts had been audited by KPMG who issued ASV with a clean audit certificate.

3.3 Assurance on Financial Procedures and Scheme of Delegation – ASV accepted the Hub's recommendation to review its Financial Procedures document and confirmed that this review was due to take place by 30 April 2018. They added

that the development of a scheme of delegation to officers would also be considered as part of this review.

3.4 Assurance that the Board considers financial implications when taking decisions – ASV advised that at its meeting on 23 March 2018 the Board would consider whether to revise its report template to include a Financial Implications section to outline anticipated financial impacts and risk in order to inform decision making.

3.5 Assurance that financial performance is scrutinised by the Board – ASV advised that financial performance was a standing item on Board agendas and highlighted that scrutiny had been robust with members taking an active interest in results and governance to hold senior management to account. ASV appended Board minutes from 8 September and 8 December 2017 which provided assurance that the Board had considered risk and financial implications prior to decision making.

3.6 Assurance on Internal Audit – ASV provided copies of its draft three year Internal Audit Programme and its Management System and Improvement Planning process. They advised that the Internal Audit Programme would be recommended for approval at the Board meeting on 23 March 2018 as internal auditors had been trained and deemed competent to carry out all verification and associated recommendations. ASV appended the minute of its Board meeting from 8 September 2017 which provided assurance that the Board had discussed the findings and recommendations of an audit report on health and safety and a report from QUEST (a sportscotland endorsed UK quality scheme for sport and leisure) following their unannounced entry visit on 7 April 2017. The QUEST evaluators rated ASV's handling of the unannounced visit to be 'Excellent' and the way it measured impacts and outcomes; and contribution to health and wellbeing to be 'Outstanding', with an overall score of 'Outstanding'. ASV also presented a sample of internal audit reports that had been presented to the Board and Senior Management Team.

Financial Management Assessment –The Hub agreed to request further assurance from ASV that their business plan had been updated to account for the planned reduction in Council funding during 2018-19 which had been phased in following an agreement between its partners. The Hub welcomed ASV's planned review of its Financial Procedures and possible adoption of a scheme of delegation, both of which were based on Hub recommendations. The Hub also reviewed ASV's internal audit arrangements and found them to be satisfactory although it agreed to request further detail on the specific areas the audits would cover and how the internal audit programme would link back to the mitigation section within the risk register.

Overall, based on the assurance provided, ASV's financial management was assessed as **Low Risk**.

4. Future Oversight Arrangements - The Hub was assured that ASV was taking appropriate steps to comply with GDPR by 25 May 2018 and that its risk management approach continued to be robust. The Hub welcomed ASV's planned review of its Financial Procedures and possible adoption of a scheme of delegation and agreed to request these documents ahead of its next meeting. The Hub also agreed to request ASV's Business Continuity Plan and IT Support SLA along with updates on GDPR compliance and business planning to account for the phased reductions in the Council's annual funding settlement. Overall, based on the assurance provided, the Hub assessed ASV to be **Low-Medium Risk** to the Council. This risk rating has slightly increased since the Hub's last report to the Audit, Risk and Scrutiny Committee on 23 November 2017 to reflect the complexity of implementing GDPR.

Assurance Standard - May 2018	Risk Rating
Unambiguous responses demonstrating clear understanding and comprehensive ability to fulfil ACC requirements, giving full detail as how these are achieved.	Very Low
Responses provide evidence of good understanding and compliance although limited detail provided for some areas	Low
Responses provide some indication of understanding and compliance	Medium
Minimal or poor responses providing little evidence of understanding or compliance.	High
Nil or inadequate responses with little or no understanding of requirement or evidence of compliance.	Very High