London Borough of Barnet

Internal Audit Annual Opinion 2013-14

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1. Introduction and Overview

Purpose of this report

This report summarises the work that Internal Audit has undertaken during 2013-14 and the key internal control environment strengths and weaknesses identified within the year. This report is used to inform the Annual Governance Statement that accompanies the Statement of Accounts for 2013-14.

Overview of our approach

In line with the Public Sector Internal Audit Standards, the 2013-14 Internal Audit plan was risk based, which has been formulated by:

- Linking with the Corporate Plan;
- Meetings with officers from all Directorates to discuss risks;
- Assessing the risk management system for adequacy; and
- Internal Audit's 'Cumulative Audit Knowledge and Experience'

I can confirm that during 2013-14 in all material respects the internal audit service has conformed to the requirements of the Public Sector Internal Audit Standards.

Our role in internal audit is to provide an annual assurance statement on the adequacy and effectiveness of the Council's governance processes, risk management and control environment – the 'system of internal control'.

In broad terms our Internal Audit approach takes into account the following (according to 2012/13 audited statement of accounts):

- **Annual gross revenues of approximately £674m** - Internal Audit perform key fundamental audits of all major income systems each year (for example Council Tax, National Non-Domestic Rates, Housing Benefits). Our work is focused on the system controls (including interfaces) and manual controls such as performance of reconciliations and clearing of suspense accounts. In addition, we review the collections of income through an annual review of income and debt management controls.
- **Annual gross expenditure of approximately £940m** – Each year we perform key financial system audits around the Council's accounts payable system. We also conduct reviews into the effectiveness of controls over other significant areas of spend, for example payroll and corporate procurement.

- **Long term assets of approximately £1.127bn** - The majority of assets are property and so present a relatively low risk to the Council. We generally undertake one review in this area each year based on risks identified.
- **Other assets of approximately £284m** - We annually review treasury controls and the Council's administration of investments.

Overview of our work

The Annual Internal Audit Plan for 2013-14 highlighted that a total of 44 systems based audits and 26 school audits were planned. We have communicated closely with senior management throughout the year to ensure that the audit reviews actually undertaken continue to represent a focus on high risk areas, in the light of new and ongoing developments in the Council to ensure the most appropriate use of our resources.

As a result of this liaison, some changes were agreed to the plan during the year. Some projects have been added/deleted/merged or carried forward from the Plan. Consequently, the total number of audits undertaken in 2013-14 was **48 systems based audits and 23 school based audits**. See Section 2 Overall Summary.

We generally undertake individual audits with one of two objectives in mind. The majority of audits are geared towards providing assurance to management on the operation of the Council's internal control environment. Other audits are geared towards the provision of specific advice and support to management to enhance the efficiency, effectiveness and economy of the services and functions for which they are responsible.

All audit reports include recommendations and actions agreed with management that will, if implemented, further enhance the control environment and the operation of the controls in practice.

This report sets out the results of the work performed as follows:
• **Overall summary** of work performed by Internal Audit including an analysis of report ratings; and
• **Key themes identified** during our work in 2013-14 and an update on those themes identified from the previous year.

In this report, we have drawn on the findings and assessments included in all of the reports issued, all reports had been finalised in full and signed off by the relevant Director/Assistant Director. Senior Management and the Audit Committee have separately received summaries of the outcomes of the audit work through progress reports issued through-out the year, as a result the detailed findings have not been replicated in this report.

2. Overall Summary

Overall, as illustrated in the tables below, we have noted an improvement in the percentage of 'Satisfactory' and 'Substantial' assurance reports issued compared to 'Limited' and 'No' assurance. Overall there were more satisfactory audit reports issued (64%) compared to 60% of audit reports in the previous year.

However, there has been a converse increase in 'No' assurance ratings with 3 having been given compared to only 1 in 2012/13 and none in 2011/12. The 'No' assurance ratings were related to IT and Contract Management issues; the findings feed into the key themes in Section 3 of this opinion and will be areas of sustained attention in 2014/15.

For detail of which reviews received each level assurance please see Appendix B.

> *Based on the internal audit work completed in 2013-14 I can give **Satisfactory Assurance** on the Council's overall internal control environment.*
>
> *In addition, based on the internal audit work performed I can give **Satisfactory Assurance** on the key controls in operation within key financial systems.*

Report ratings

| Assurance opinions | No of Audits / Projects | | | | | |
| | 2013-14 | | 2012-13 | | 2011-12 | |
	No.	%	No.	%	No.	%
Substantial	1	2	-	-	-	-
Satisfactory	33	64	27	60	19	51
Limited	7	14	10	22	14	38
No	3	6	1	2	-	-
Assurance projects	7	14	7	16	4	11
Sub-total*	51		45		37	

Schools audits**	23		28		25	
Total	**74**	**100**	**73**	**100**	**62**	**100**

* On two reviews the Assurance rating was split due to different accountable officers. Therefore to calculate the % of reports with each assurance rating the different elements of scope have been counted as separate reviews, see Appendix B for reconciliation to total number of reports issued as per 'Introduction and Overview' section:

** For breakdown of Schools audit assurance ratings see 'Analysis of School audit assurances' below

Key Financial Systems

The results below show improvement over the controls surrounding key financial systems with 100% obtaining satisfactory assurance.

Key financial systems	2013/14		2012/13		2011/12	
	No.	%	No.	%	No.	%
Substantial	-	-	-	-	-	-
Satisfactory	10	100	8	80	8	80
Limited	-	-	1[†]	10	2	20
No	-	-	-			
N/A			1[#]	10	-	
Total Assurance ratings	**10[###]**	**100**	**10**	**100**	**10**	**100**

[†] The one key financial system which was given Limited Assurance in 2012/13 was Housing Benefits.

[#] The capital programme was reviewed in 2012/13 through a diagnostic review to consider individual projects and consider consistency. This diagnostic review did not give an assurance level as not all aspects of the diagnostic were run.

[###] See Appendix B for list of the 10 Key Financial System audits which were undertaken in 2 Groups.

Analysis of School audit assurances

The Scheme for Financing Schools states that "the Chief Finance Officer shall arrange an adequate and effective internal audit, under his/her independent control, to examine the schools' accounting, financial and other operations." The table below outlines the assurances given for those 23 schools reviewed.

The results highlight that broadly schools are performing consistently in respect of financial management capability, compared to the previous years. It is important to note that we are currently on a three year cycle with the auditing of primary schools and five years for secondary schools and we are not comparing the same schools year on year.

Assurance opinions	2013-14		2012-13		2011-12	
	No.	%	No.	%	No.	%
Substantial	0	-	1	4	2	8
Satisfactory	17	74	24	86	18	72
Limited	6	26	3	10	4	16
No	-	-	-	-	-	-
Special Audits	-	-	-	-	1	4
Total	23	100	28	100	25	100

*Based on the school audits carried out during 2013-14 I am able to give **Satisfactory Assurance** that there is an adequate system for financial management processes and controls among the Council's schools.*

3.   Key themes

There are a number of areas that are cross-cutting in nature, in that they cross many service directorates, included within our Internal Audit Plan. By reviewing all audit reports for the year it enables us to draw key themes that require attention by the Council. Any significant issues will be included within the Council's Annual Governance Statement.

Internal Control and Governance

Progress against key themes notes in 2012-13 annual audit report
The following table notes progress against the themes identified in the 2012-13 annual audit report, and whether there is a residual governance issue to be taken forward within the Annual Governance Statement:

Issue	Progress 2013-14	Residual Issue
Data protection in the context of records, data and information management - having fit for purpose systems to manage data in relation to children and vulnerable adults remains a priority particularly to support good records management	A number of audits involving Data Protection took place during the year and provided Satisfactory Assurance: • Information Management and Governance • Customer and Information Management Board reviews • SAP Data Migration However, a number of reviews identified weaknesses in IT systems. In particular two IT audits were undertaken which provided No Assurance and the issues identified have data protection consequences: • **IT Access Controls** Where IT access controls are not in place or are not operating effectively this makes it difficult to ensure the integrity and security of data.	**Yes**, there is a significant governance issue considered in relation to system access controls ensuring the integrity and security of data.

Issue	Progress 2013-14	Residual Issue
	• **SWIFT & Wisdom** The SWIFT system in Adult Social Care was found to have significant functionality issues. Where this is the case staff may be forced to seek alternative methods to be able to undertake their urgent day-to-day work, for example keeping records outside of password-protected systems. This leads to an increased inherent risk of a data protection incident occurring.	
Records Management and Data sharing – in a number of reviews there were some concerns noted for restriction of access to systems and data contained within those systems (Records Management (Children's Service), Housing Benefits, in addition there was non-compliance noted with the records retention and disposal policy within a number of services. We do however note that data sharing is a necessary aspect of work across partnerships for delivery of outcomes for Children in particular and recommend that this is done under an appropriate framework.	Linked to the issue identified above there continues to be weaknesses surrounding access to systems being appropriately restricted. In particular the SWIFT system not being fit for purpose in Adults meant that officers had to resort to keeping files and information locally where it was not protected. In addition, at the time of the audit evidence was not available to confirm that data was appropriately backed up. The follow-up work undertaken in 2013/14 on Records Management in the Children's Service has shown an improvement and that interim controls have been introduced, but it is not possible for all recommendations to be fully implemented until the completion of the roll-out of an enhanced version of Tribal as a system for capturing information centrally. This is due for completion in June 2014 and will minimise duplication of information and the use of alternate local systems for recording information, facilitate the efficient retrieval of all relevant data and the efficient update of records.	**Yes**, there is a significant governance issue considered in relation to system access controls ensuring the integrity and security of data.

Issue	Progress 2013-14	Residual Issue
	Therefore the work assessing this will continue in 2014/15.	
Data Quality – given the focus on commissioning and the reliance on data in respect of third party providers the performance management framework requires development a focus on data quality. The focus should be on setting up an appropriate quality assurance framework to support decision making.	A number of audits involving data quality (DQ) reviews took place in the year: • Data Quality (cross-cutting review) • Performance Management (cross-cutting review) • Safeguarding Adults DQ • Safeguarding Children Section 11 • Autism Self-Assessment • Planning Service performance management • DRS Baseline The majority of these audits were awarded satisfactory assurance. Whilst there were no significant issues noted with the accuracy of the data reported we did note the following across these reviews: • Baseline data in some cases was found to be missing; • Some data is not stored appropriately to preserve its integrity; • A lack of audit trails in some cases and therefore non-compliance with the Council's data quality policy; and • Some data submitted was not subjected to quality assurance procedures.	**No**, whilst there are examples of control weaknesses these are not considered a significant governance issue to carry forward. However, it will be an area that is featured within our audit plan for 2014-15 to ensure no slippage against the progress noted.
Business Continuity and Resilience – overall the direction of travel for improvements to	An audit of Business Continuity was conducted during the year and a rating of Limited Assurance was given.	**Yes**, business continuity and

Issue	Progress 2013-14	Residual Issue
business continuity and disaster recovery resilience has been gradual since 2007 with the overall assessment of the controls remaining limited over a five year period and not considered sufficient to prevent large scale failures in service provision. This is particularly the case for information systems. As plans to rectify this through the NSCSO contract are on hold due to the judicial review there remains a significant risk to the Council if plans remain delayed.	Whilst there had been improvements noted in aspects of the control environment overall there had been no change in assurance rating since the previous year. Although the Council now has a Business Continuity Project underway, at the time of the audit the overarching Council Business Continuity Strategy was not yet in place. As the CSG (formerly NSCSO) contract was delayed until September 2013, the planned changes to business continuity and resilience will be gradual and therefore Business Continuity remains a control risk to carry forward to 2014-15	resilience remain a key improvement area for 2014-15.

In summary the issues taken forward from previous years are:

- Systems need to ensure the integrity and security of data
- Business Continuity and Resilience

For 2013-14 the following control issues were noted and considered issues for the organisation to address in 2014-15:

1. Roles, Responsibilities and Accountabilities

During the course of the year we repeatedly found a common theme in respect of responsibility and accountability issues. Examples of these audits were:
- IT Access and Controls (No Assurance)
- SWIFT & Wisdom (No Assurance)
- Public Health
- Business Continuity
- Contract Management & Benefits Realisation Framework
- Risk Management Framework
- Customer Services & Information Management Board

There are improvements to be made to the clarity of roles and responsibilities between Commissioners, internal and external delivery unit Directors and the retained functions to ensure co-operation and collaboration in the delivery of outcomes. All parties need to take ownership of the control environment and taking forward the required improvements.

2. Contract Management Framework and Benefits Realisation

During the course of the year we repeatedly found a common theme in respect of contract management and benefits realisation. Examples of these audits were:

- Barnet Homes contract management (No Assurance)
- Parking contract (Limited Assurance)

- PFI Street lighting contract (Limited Assurance)
- Financial Management – HB Public Law recharges (Limited Assurance)
- Public Health (Limited Assurance)
- Contract Management & Benefits Realisation Framework
- Procurement Board
- Business Continuity
- Equalities
- Waste Transformation Project
- Transformation Q4

Our contract audits in 2013/14 confirmed that there is not a consistent Contract Management Framework in place across all the Council's contracts. Without such a framework in place we noted inconsistent practices on how contracts were managed across the organisation. In addition, our reviews consistently found weaknesses in Benefits Management and therefore Benefits Realisation for contracts and projects within the areas we audited. The baseline and measurement of intended benefits was not always clear. Monitoring of whether intended benefits were being achieved was inconsistent and in some cases non-existent.

Audit Recommendations

The number of high priority recommendations reduced this year from 47 in 2012-13 (30 Council and 17 Schools) to 42 in 2013-14 (22 Council and 20 Schools). The direction of travel further improved for implementing audit recommendations on a timely basis with 100% of high priority recommendations confirmed as having been implemented in 2013-14.

Risk Management

Arrangements for risk management were reviewed by PwC, our internal audit Strategic Partner, to ensure they could be relied upon as a basis for setting the Internal Audit Plan. Based on that review they gave Satisfactory Assurance that the risk management arrangements were operating as intended. The service continues to benchmark its risk management arrangements through CIPFA and also within the current year the risk management framework: policy statement and procedures was revised and reported to the Audit Committee.

The Risk Assurance Function has challenged the risks being reported quarterly as part of the performance management framework and has proactively been engaging with services and risk champions to facilitate improved risk identification, understanding and management. This process has included reviewing the joint risks between the Council and its contractual partners such as Capita.

We do note however from our internal audit work for the year that the risk identification process within services remains inconsistent, with risks not always documented appropriately within the risk management system JCAD and appropriate controls not always identified by the service to mitigate the risks. In addition, we noted that the new internal governance structures within the Commissioning Council model were initially not considering risk in a coherent or consistent manner. Recommendations were made accordingly and work is ongoing to implement these with support provided to the boards as required.

Performance of Internal Audit

99% of the 2013-14 Audit Plan was delivered by the end of the financial year (March 2014). This is an improvement on the previous year.

During the year the service has made further improvements to its performance including:
- Continuing to embed the audit approach to ensure a focus on key risks
- Revising the approach within the Internal Audit annual plan to cover all aspects of the Commissioning Council model: Cross-Cutting & Risk-Based reviews, Frameworks, Internal Governance, and External Assurance.
- Agreeing a protocol with Capita to ensure appropriate audit coverage of key risks, whether the function is directly run by the Council or by its external partner
- Starting a joint procurement process with a group of other Local Authorities for a Framework contract to provide internal audit services

After each audit we request feedback from senior management and service managers to ensure we address any perceived or actual weaknesses. This year we received 21 performance questionnaires back following completion of audits. These questionnaires give a rating from 1 (Excellent) to 5 (Unacceptable), with our target for the Internal Audit Service being to achieve 90% rated over 3. This year the service achieved 100% (100% in 2012-13) rated satisfactory (3) or above.

We continually strive to improve the Internal Audit Service and in 2014/15 will be introducing new approaches to increase efficiency and to streamline the audit process for officers across the Council. In addition we will be ensuring regular input to the Audit Plan throughout the year from all stakeholders, including the Strategic Commissioning Board, Lead Commissioners, Delivery Units, Members and residents. The Audit Plan will be responsive to the pace of change at the Council and any emerging risks.

Appendix A: Statement of Responsibility

We take responsibility for this report which is prepared on the basis of the limitations set out below.

The matters raised in this report are only those which came to our attention during the course of our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. This report is a summarisation of the 2011-12 and individual reports for each area should be reviewed in detail. Recommendations for improvements should be assessed by management for their full impact before they are implemented.

The performance of internal audit work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices. We emphasise that the responsibility for a sound system of internal controls and the prevention and detection of fraud and other irregularities rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify all circumstances of fraud or irregularity. Auditors, in conducting their work, are required to have regards to the possibility of fraud or irregularities. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas as identified by management as being of greatest risk and significance and as such we rely on management to provide us full access to their accounting records and transactions for the purposes of our audit work and to ensure the authenticity of these documents. Effective and timely implementation of our recommendations by management is important for the maintenance of a reliable internal control system.

Appendix B: List of Assurances 2013-14

	Audit Opinions on Completed Audits during the period	
	Systems Audits	**Assurance**
1	Welfare Reform - Governance Arrangements	Substantial
2	Special Parking Account – PCN deletion / write-off	Satisfactory
3	Key Financial Systems – Group 1	Satisfactory
	Treasury Management	
	Pensions	
	Payroll	
	Accounts Payable	
	Income and Debt Management	
	Cashbook	
	Capital Programme	
4	Key Financial Systems – Group 2	Satisfactory
	Housing Benefit	
	Council Tax	
	National Non-Domestic Rates	
5	Adults' Safeguarding - Data Quality	Satisfactory
6	Children in Need	Satisfactory
7	Safeguarding Children – Section 11	Satisfactory
8	Procurement Board – Internal Governance Q2	Satisfactory
9	Procurement Board – Internal Governance Q4	Satisfactory
10	Workforce Board – Internal Governance Q2	Satisfactory
11	Workforce Board – Internal Governance Q4	Satisfactory
12	Assets & Capital Board – Internal Governance Q2	Satisfactory
13	Assets & Capital Board – Internal Governance Q4	Satisfactory
14	Customer and Information Management Board – Internal Governance Q2	Satisfactory
15	Customer and Information Management Board – Internal Governance Q4	Satisfactory
16	Barnet Autism Self-Assessment review	Satisfactory
17	Data Quality	Satisfactory
18	Equalities	Satisfactory
19	Legislative changes – Education and Skills	Satisfactory
20	NSCSO Mobilisation	Satisfactory
21	Children's Placements	Satisfactory
22	Transformation Q1	Satisfactory
23	Transformation Q4	Satisfactory
24	Early Intervention & Prevention	Satisfactory
25	Regulation of Investigatory Powers Act (RIPA) review	Satisfactory
26	Health & Social Care Integration	Satisfactory
27	Partnerships	Satisfactory
28	Information Management and Governance	Satisfactory
29	Risk Management Framework	Satisfactory

30	Performance Management Framework	Satisfactory
31	Waste – Project assurance	Satisfactory
	Financial Management*	
32	General (budgetary control, budget management, journals authorisation, roles & responsibilities)	Satisfactory
33	Charges for Legal Services	Limited
	Contract Management & Benefits Realisation Framework*	
34	Commissioning Group	Satisfactory
35	CSG	Satisfactory
36	Barnet Homes	No
37	Planning Service – Data Quality	Limited
38	PFI Street lighting – Contract Management	Limited
39	Business Continuity	Limited
40	People Management	Limited
41	Parking contract management	Limited
42	Public Health	Limited
43	IT Access Controls	No
44	Adults' SWIFT & Wisdom	No
45	DRS Baseline review	N/A
46	Regeneration follow-up	N/A
47	Children's Safeguarding assurance process map	N/A
48	Adults' Safeguarding assurance process map	N/A
49	Troubled Families – Payment by Results (Oct 2013 submission)	N/A
50	Troubled Families – Payment by Results (Feb 2014 submission)	N/A
51	SAP Data Migration	N/A

* Assurance rating was split due to different accountable officers. Therefore to calculate the % of reports with each assurance rating the different elements of scope have been counted as separate reviews. Reconciliation to total number of reports issued as per 'Introduction and Overview' section:

Introduction and Overview total	48
Plus: Financial Management split – Charges for Legal Services	1
Plus: Contract Management & Benefits Realisation Framework split – CSG and Barnet Homes	2
Total as per above	**51**

	School Audits	**Assurance**
1	Woodcroft	Satisfactory
2	Bishop Douglass	Satisfactory
3	Friern Barnet	Satisfactory
4	Childs Hill	Satisfactory
5	Wessex Gardens	Satisfactory
6	Bell Lane	Satisfactory
7	St James Catholic High	Satisfactory
8	Jewish Community Secondary	Satisfactory
9	Queenswell Junior	Satisfactory
10	St Mary's & St John's	Satisfactory
11	Oak Lodge	Satisfactory
12	Coppetts Wood	Satisfactory
13	Claremont	Satisfactory
14	Sacred Heart	Satisfactory
15	St Paul's N11	Satisfactory
16	Holy Trinity	Satisfactory
17	Goldbeaters	Satisfactory
18	Osidge	Limited
19	Orion	Limited
20	Livingstone	Limited
21	Beis Yaakov	Limited
22	Rosh Pinah	Limited
23	Hollickwood	Limited

Appendix C: List of Assurances 2013-14 by Delivery Unit

	Audit Opinions on Completed Audits during the period	
	Adults & Communities	**Assurance**
1	Adults' Safeguarding - Data Quality	Satisfactory
2	Barnet Autism Self-Assessment review	Satisfactory
3	Health & Social Care Integration	Satisfactory
4	Adults' SWIFT & Wisdom	No
5	Adults' Safeguarding assurance process map	N/A
	Children's Service	
6	Children in Need	Satisfactory
7	Safeguarding Children – Section 11	Satisfactory
8	Early Intervention & Prevention	Satisfactory
9	Children's Placements	Satisfactory
10	Legislative changes – Education and Skills	Satisfactory
11	Children's Safeguarding assurance process map	N/A
12	Troubled Families – Payment by Results (Oct 2013 submission)	N/A
13	Troubled Families – Payment by Results (Feb 2014 submission)	N/A
	Street Scene	
14	Waste – Project assurance	Satisfactory
15	Special Parking Account – PCN deletion / write-off	Satisfactory
16	PFI Street lighting – Contract Management	Limited
17	Parking contract management	Limited
	Commissioning Group	
18	Welfare Reform - Governance Arrangements	Substantial
19	Key Financial Systems – Group 1	
	Treasury Management	Satisfactory
	Pensions	Satisfactory
	Payroll	Satisfactory
	Accounts Payable	Satisfactory
	Income and Debt Management	Satisfactory
	Cashbook	Satisfactory
	Capital Programme	Satisfactory
20	Key Financial Systems – Group 2	
	Housing Benefit	Satisfactory
	Council Tax	Satisfactory
	National Non-Domestic Rates	Satisfactory
21	NSCSO Mobilisation	Satisfactory
22	Transformation Q1	Satisfactory
23	Transformation Q4	Satisfactory

	Audit Opinions on Completed Audits during the period	
24	Partnerships	Satisfactory
25	Performance Management Framework	Satisfactory
	Contract Management & Benefits Realisation Framework	
26	Commissioning Group	Satisfactory
27	CSG	Satisfactory
28	Barnet Homes	No
29	Planning Service – Data Quality	Limited
30	Public Health	Limited
31	IT Access Controls	No
32	DRS Baseline review	N/A
33	Regeneration follow-up	N/A
34	SAP Data Migration	N/A
	Assurance Group	
35	Regulation of Investigatory Powers Act (RIPA) review	Satisfactory
36	Risk Management Framework	Satisfactory
	Internal Governance	
37	Procurement Board – Internal Governance Q2	Satisfactory
38	Procurement Board – Internal Governance Q4	Satisfactory
39	Workforce Board – Internal Governance Q2	Satisfactory
40	Workforce Board – Internal Governance Q4	Satisfactory
41	Assets & Capital Board – Internal Governance Q2	Satisfactory
42	Assets & Capital Board – Internal Governance Q4	Satisfactory
43	Customer and Information Management Board – Internal Governance Q2	Satisfactory
44	Customer and Information Management Board – Internal Governance Q4	Satisfactory
	Cross Cutting	
45	Data Quality	Satisfactory
46	Equalities	Satisfactory
47	Information Management and Governance	Satisfactory
	Financial Management	
48	General (budgetary control, budget management, journals authorisation, roles & responsibilities)	Satisfactory
49	Charges for Legal Services	Limited
50	People Management	Limited
51	Business Continuity	Limited