

27 February 2020 G20 20 01

Mr Dugald Saunders MP Chair Committee on the Ombudsman, the Law Enforcement Conduct Commission and the Crime Commission

Via email: OmboLecc@parliament.nsw.gov.au

Dear Chair

Re: Hearing of the Parliamentary Joint Committee

During the committee hearing on 17 February 2020, Mr Adam Searle requested a copy of a report prepared by Centium concerning LECC's complaint handling processes. In response to Mr Searle I indicated that I would make the relevant inquiries with LECC to ascertain if there was any restriction to my providing a copy of that report to the Committee.

I am advised by LECC that Centium has no objection to the report being released. I am further advised by LECC that the "report was prepared in compliance with the Commission's obligations under the Treasury Internal Audit and Risk Management Policy for the NSW Public Sector (tpp15-03)" and that it would appreciate my informing the Committee of that fact.

Please find attached a copy of Centium's report. I would appreciate it if Mr Searle could be provided with a copy both of this letter and the report itself.

Yours sincerely



The Hon Terry Buddin SC
Inspector of the Law Enforcement Conduct Commission



centium

law enforcement conduct commission june 2019; revised July 2019; FINAL



OVERALL CONTROL EFFECTIVENESS

Policies

LECC complaints assessment policies are up-to-date, compliant with legislation, and consistent with good practice.

Accessible Information

LECC has accessible information for the public to enable the receipt of complaints and explain what might happen if they complain.

Complaints Recording

LECC has procedures, systems and processes in place to ensure all complaints are captured, recorded and managed securely.

Complaints Assessment

Complaints are assessed confidentially, fairly and in a timely manner in accordance with internal Key Measures of Success.

Accountabilities

There are clear accountabilities for complaints assessment, including prioritisation and outcome notification.

Satisfactory

Effective

Satisfactory

Satisfactory

Satisfactory

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Information & Training

Effective

LECC staff are aware of complaints assessment processes, including appropriate information and training.

Monitoring & Continuous Improvement

Effective

Complaints (including outcomes and trends) are monitored with the aim of improving systems and processes.

1 LOW RISK

6 MED RISKS

2 HIGH RISKS

0 EXTREME

SUMMARY OF KEY POSITIVE CONTROLS

- 1 Frontline staff appear to be competent in addressing queries from members of the public.
- 2 Information available to the public adequately explains the role of the LECC and how to make a complaint.
- 3 Physical controls are in place ensure all complaints are managed securely.
- 4 The process for complaints allocation is clearly defined and understood by the Assessments team.
- **5** Conflicts of interest are effectively managed throughout the complaints assessment process.
- **6** Complaints are captured and monitored to improve the timeliness of the complaints assessment process.

SUMMARY OF KEY FINDINGS

1 A review of a sample of complaints identified that not all had been registered; further, not all complaints are registered in a timely manner.

2 There were instances where new complaints had not been tasked to the Assessments team; in addition, not all complaints had been tasked to the Assessments team in a timely manner.

3 Complaints received via email could currently be deleted and there is no process to identify deleted emails.

4 Not all complainants receive acknowledgement of their complaint in writing and/or in a timely manner.

5 Not all complainants are notified of the outcome of their complaint in writing and/or in a timely manner.

6 There are inconsistencies in staff perceptions of the roles and responsibilities of other staff involved in the complaint assessment process.



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POLICIES

1. POLICIES AND PROCEDURES ARE OVERDUE FOR REVIEW

CONSEQUENCE	LIKELIHOOD	RATING	
Minor	Unlikely	Low	

Issue: Assessments policies and procedures are overdue for review.

As per the LECC Policy Framework, policy sponsors are to ensure the review cycle is maintained and that a record of the revision history is maintained.

Our review identified that the following complaints assessment policies and procedures were overdue for review:

- Managing Unreasonable Complainant Conduct Policy review due July 2018
- Managing Unreasonable Complainant Conduct Procedure – review due July 2018
- Inmate Engagement Procedure review due July 2018.

Root Cause: The assessment of complaints has been prioritised over policy review.

IMPACT

Policies and procedures may not reflect current practice.

AGREED ACTIONS

 Review the listed policies and procedures to ensure consistency with legislation and current practice; update policy / procedure history to reflect the review and include a date for future review.

2. COMPLAINTS ARE NOT REGISTERED

CONSEQUENCE	LIKELIHOOD	RATING	
Moderate	Unlikely	Medium	

Issue: A review of a sample of complaints identified that not all had been registered.

Where complaints are not registered, the complaint cannot be assessed, and the complainant cannot be notified of the outcome.

Our review of a sample of 56 complaint source documents to LECC's Case Management System (CMS) identified one complaint received had not been registered.

Further investigation found that the complaint had been hand delivered to front-line Security staff. However, there was no subsequent record indicating that it had been transferred to the Registry.

Root Cause: Process breakdown between Security staff and the Registry.

IMPACT

In the absence of checking procedures to ensure all complaints received by Security are delivered to the Registry, there is no assurance that all complaints have been captured.

Where it is known that a complaint was submitted to the LECC and no action was subsequently taken, there is a risk of reputational harm.

AGREED ACTIONS

2. Implement formal checking procedures to ensure all complaints received by Security staff are delivered to registry for registration and tasking (e.g. signature on transfer of the documents). Document new checking procedures to ensure all relevant staff understand the process and are aware of their responsibilities.

3. COMPLAINTS ARE NOT REGISTERED IN A TIMELY MANNER

CONSEQUENCE	LIKELIHOOD	RATING	
Minor	Possible	Medium	

Issue: Not all complaints are registered in a timely manner.

The LECC Registry's Guarantee of Service requires all mail to be registered on the day of receipt; all "Contact Us" emails are required to be registered within two days of the first working day of receipt.

We compared the date the complaint was received to the date the complaint was registered in CMS for a sample of 56 complaints. Our review identified four complaints that were registered one week after receipt in CMS.

All four complaints were received via external mail or hand delivered to LECC and were retrospectively identified as a result of independent checking procedures within the Registry.

Root Cause: Unclear processes regarding the daily allocation of mail to registry staff to register in CMS. Delays in the independent checking of mail registration in CMS.

IMPACT

- Breach of the LECC Registry's Guarantee of Service.
- Delays in the registration of complaints directly impacts the timeliness of complaint assessment processes and could result in reputational damage.
- Complaints that require urgent attention are not triaged appropriately.

AGREED ACTIONS

- **3.** Clarify the daily allocation process for registering mail received. The process should be documented in a procedure to ensure all relevant officers understand the process and are aware of their responsibilities.
- **4.** Review current procedures to increase the frequency and timeliness of independent checking processes to ensure complaints are registered in a timely basis.

4. COMPLAINTS ARE NOT ALWAYS APPROPRIATELY TASKED

CONSEQUENCE	LIKELIHOOD	RATING
Minor	Almost certain	Medium

Issue: There were instances where new complaints had not been tasked to the Assessments team; in addition, not all complaints had been tasked to the Assessments team in a timely manner.

The Registration of Complaints and Related Correspondence procedure outlines the process for registry officers to register complaints in CMS. The procedure also outlines the process to allocate the complaint to the Assessments team via a task.

The LECC Registry's Guarantee of Service requires all mail to be registered on the day of receipt; all "Contact Us" emails are required to be registered within two days of the first working day of receipt. We confirmed with the Registry Manager that the Guarantee of Service also includes tasking complaints to the Assessments team for action.

Our review of a sample of 56 complaint source documents identified three complaints received by the Registry that had not been appropriately tasked to the assessments team within CMS. Two were received via fax/mail and one was received via the "Contact Us" email account.

Importantly, the Registry's independent review procedures had not identified that these complaints had not been tasked.

In addition, our review also identified three complaints were tasked one week after their registration in CMS. Each of these complaints were received via mail (Australia post) and were captured through the Registry's independent review process.

Root Cause: Registry staff do not ensure all complaints are tasked at the same time as registration.

The Registry's independent review processes are performed on a weekly basis.

IMPACT

- Where complaints are not tasked, the Assessments team is unaware of the complaint and cannot commence the assessment process
- Breach of the LECC Registry's Guarantee of Service.

AGREED ACTIONS

5. Ensure the specifications of LOIS include an automated tasking workflow after registering complaints. In the interim, remind staff of the importance of tasking all complaints for assessment.

5. COMPLAINTS COULD BE DELETED WITHOUT DETECTION

CONSEQUENCE	LIKELIHOOD	RATING
Major	Possible	High

Issue: Complaints received via email could currently be deleted and there is no process to identify deleted emails.

Functional retention and disposal authority FA397 as issued by the State Archives and Records Authority of NSW states that records regarding complaints against the conduct of law enforcement officers should be retained for a minimum of ten years after action completed.

Our review of the complaint assessment process identified that emails can be deleted by all users with access to the "Contact Us" and "Complaints" email accounts without detection. Emails could also be deleted from the "deleted items" folder without detection

There are currently no processes in place to monitor the deletion of emails from any of these accounts or folders.

Root Cause: There are no system limitations regarding user access to the "Contact Us" and "Complaints" email accounts.

There are no review processes in place to provide assurance that complaints from the public received via email have not been deleted.

IMPACT

- Destruction of complaints prior to completed action is a breach of FA 397 and could constitute an act of fraud
- Where it is known that a complaint was submitted to the LECC and no action was subsequently taken, there is a risk of reputational harm.

AGREED ACTIONS

- **6.** Update applicable policies and procedures to include the records management responsibilities of FA397. In the interim, ensure all officers are aware of their FA397 responsibilities regarding record destruction.
- 7. Partner with LECC's ICT specialists to design a report that captures all deleted emails from the "Contact Us" and "Complaints" email accounts. Institute processes to ensure that this report is reviewed by both the Registry Manager and an appropriate officer who does not have system access to the email accounts.

COMPLAINTS ASSESSMENT

6. COMPLAINANTS ARE NOT ACKNOWLEDGED

CONSEQUENCE	LIKELIHOOD	RATING	
Minor	Possible	Medium	

Issue: Not all complainants receive acknowledgement of their complaint in writing.

The Complaint Assessment Procedure outlines that the assessment team will respond to complainants and acknowledge their complaint and consideration will be given to the most appropriate method (e.g. email, letter).

Our review of a sample of 24 complaints in CMS identified 11 complainants did not receive acknowledgement of their complaint in writing. It should be noted that anonymous complainants were excluded from this sample.

We would acknowledge there has been a template in place since April 2018 to acknowledge complainants in writing. That being said, our sample identified two complainants that did not receive written acknowledgement post introduction of the template.

We would also acknowledge that complaints sent in writing via email are automatically provided with an acknowledgement of receipt.

Root Cause: Prior to April 2018, the process for notifying complainants of acknowledgement of their complaint was to make three attempts to contact the complainant via phone. Record of each attempt was supposed to be recorded in CMS.

Since April 2018, there has been no independent check to ensure an acknowledgement letter has been sent to all complainants.

Where the timing of the acknowledgement is the same as the outcome, only the outcome letter is sent to the complainant.

IMPACT

- Where complainants are not assured that their complaint has been received by LECC, there are increases in the number of queries to the switchboard from the complainants regarding the status of their complaint.
- · Complainants may feel discouraged from making further complaints to LECC.
- Increased likelihood of reputational damage where aggrieved complainants take their complaint outside LECC.

AGREED ACTIONS

8. Implement an independent checking process to ensure that all complainants receive written acknowledgement of their complaint where applicable.

COMPLAINTS ASSESSMENT

7. COMPLAINANTS ARE NOT ACKNOWLEDGED IN A TIMELY MANNER

CONSEQUENCE	LIKELIHOOD	RATING	
Minor	Possible	Medium	

Issue: Not all complainants receive acknowledgement of their complaint in a timely manner.

The LECC Strategic Plan outlines Key Measures of Success that includes 100% of complaints acknowledged and triaged within ten working days.

Our review of a sample of 24 complaints in CMS, identified that seven complainants were notified more than ten business days following receipt of their complaint. In one instance, the complainant was notified after 182 days of receipt.

Root Cause: Delays in the complaint assessment process due to the considerable increase in the number of complaints to assess and no corresponding increase in resources.

IMPACT

- Breach of LECC's Key Measure of Success.
- Delays could result in increased number of queries to the switchboard from the complainants regarding the status of their complaint.

AGREED ACTIONS

9. Reaffirm current Key Measures of Success with the Assessment team to ensure that all future complaints are acknowledged within ten business days.

COMPLAINTS ASSESSMENT

8. COMPLAINANTS ARE NOT NOTIFIED OF THE OUTCOME

CONSEQUENCE	LIKELIHOOD	RATING		
Moderate	Likely	High		

Issue: A review of a sample of complaints identified that complainants are not notified of the outcome of their complaint in writing; in addition, not all complainants had been notified by the Assessments team in a timely manner.

Various sections of the Law Enforcement Conduct Commission Act 2016 (i.e. LECC Act) require the complainant to be informed of the Commission's decision regarding their complaint, for example Section 44(8).

In addition, LECC's Complaint Assessment Procedure states that 90% of misconduct matters will be dealt with within 20 business days of receipt of the complaint. For direct complaints, the time taken commences at the date of receipt of the complaint by the LECC and concludes with the date that the Complaints Assessment Panel (CAP) either decides or ratifies the recommendation for the complaint.

Our review of a sample of 24 complaints in CMS identified two instances where complainants were not notified of the outcome of their complaint in writing. It should be noted that anonymous complainants were excluded from this sample. Both complaints

were received prior to February 2019. Our review of the same 24 complaints found that 11 complainants were notified of the outcome of their complaint after 20 business days.

Root Cause: There is no independent checking process to ensure that all complainants have received written notification of the outcome of their complaint.

Delays in the complaint assessment process due to the considerable increase in the number of complaints to assess and no corresponding increase in resources.

IMPACT

- Non-compliance with the LECC Act.
- Breach of LECC's Complaint Assessment Procedure.
- Non-compliance could result in increased number of queries to the switchboard from the complainants regarding the status of their complaint.

AGREED ACTIONS

- **10.** Review existing processes to include independent checks at various milestones to ensure complainants are notified of the outcome of their complaint.
- **11.** Revise LECC's Complaint Assessment Procedure to ascertain ongoing relevance and practicality, specifically the timeframe of 20 business days.

ACCOUNTABILITIES

9. INCONSISTENT PERCEPTIONS OF ROLES AND RESPONSIBILITIES

CONSEQUENCE	LIKELIHOOD	RATING
Minor	Possible	Medium

Issue: There are inconsistencies in staff perceptions of the roles and responsibilities of other staff involved in the complaint assessment process.

It is important to ensure that all officers involved are aware of their own responsibilities and the roles of other staff to support the effectiveness of the complaint assessment process.

We reviewed LECC policies, procedures, and role descriptions for consistency against the perceptions of key staff involved in the complaint assessment process.

We found that there are inconsistent perceptions / expectations of the role of the Registry in making notations regarding phone calls to the switchboard. That is, the Assessments team expect that all phone calls will be "registered", yet the Registry team cited workload issues and only record some calls in CMS.

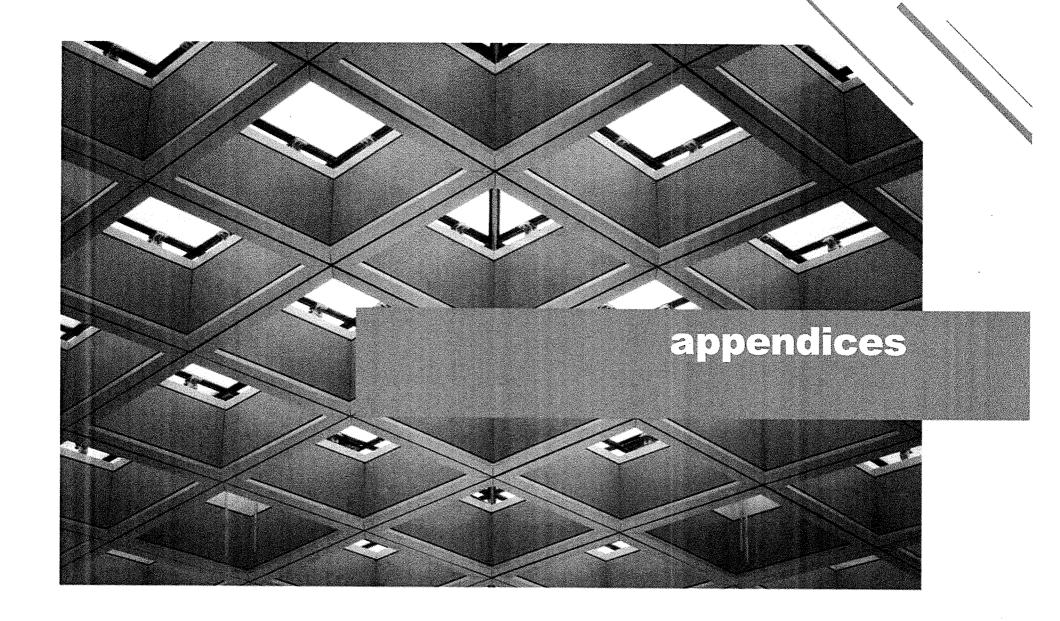
Root Cause: Breakdown in communication between Registry and Assessments teams.

IMPACT

- Inconsistencies in perceptions of the roles and responsibilities of other staff can compromise the overall complaints assessment process.
- Current processes mean that it is not possible to readily identify complainant contact history and/or readily locate recordings of telephone calls.

AGREED ACTIONS

- **12.** Clarify roles and responsibilities of staff involved in the complaint assessment process and update all applicable documentation (e.g. role descriptions, policies and procedures).
- 13. Collaboratively design a process to capture basic information regarding all calls to the switchboard (e.g. date, time, name, call category, etc.) to enable call recordings to be readily accessed by appropriate staff. The process should be documented in a procedure to ensure all relevant officers understand the process and are aware of their responsibilities.



APPENDIX 1

The following control effectiveness and risk definitions are per those defined per LECC's ERM Standards Risk Management Framework.

CONTROL EFFECTIVENESS DEFINITIONS

Control Effectiveness	Definition
Effective	Controls are well designed and are operating effectively, and management monitoring and review of controls is established
Satisfactory	Controls are reasonably well designed, and most aspects are operating effectively with some areas for improvement
Needs Attention	Certain controls are not well designed and/or are systematically not operating effectively
Ineffective	Significant gaps in the design and operation of controls. No confidence that any degree of control is being achieved

RISK DEFINITIONS - CONSEQUENCE TABLE

			Consequence Definitions				
		Insignificant	Minor	Moderate	Major	Severe	
7 / 7 / 7 / 7 /	Strategic LECC Strategic Plan	Negligible impact on strategic objectives per the LECC Strategic Plan.	Manageable impact on strategic objectives. Some reprioritisation of resources required.	Unable to deliver an important strategic objective or planned deliverable.	Unable to deliver one or more <i>critical</i> strategic objectives or planned deliverables.	Unable to deliver most strategic objectives and deliverables. The LECC's Strategic Plan must be revised.	
	Service Continuity LECC Operational Plans; Complaints Handling, Assessment and/or	Negligible impact on operational functions.	Short-term disruption to operational functions.	Significant disruption to operational functions.	Extended significant disruption to operational functions.	Inability to deliver operational functions.	
Categories	Investigations disruptions; Service disruption and/or continuity	delivery, management of complaints, assessment activities or investigations.	- <3-day impact on service delivery, management of complaints, assessment activities or investigations.	3 - <14-day impact on service delivery, management of complaints, assessment activities or investigations.	14 - <30-day impact on service delivery, management of complaints, assessment activities or investigations.	Inability to deliver services, manage complaints, assessment activities or conduct investigations for >30 days.	
Risk Ca	Projects Programs and Projects	Insignificant impact on a project or program, e.g. < 2% deviation in scope, scheduled completion date, cost estimate, resource requirements	Minor impact on a project or program, e.g. < 5% deviation in scope, scheduled completion date, cost estimate, resource requirements	Measurable impact on a project or program, e.g. 5-10% deviation in scheduled completion date, cost estimate, resource requirements	Significant impact on a project or program, e.g. 10-25% deviation in scheduled completion date, cost estimate, resource requirements	Major impact on a project or program, e.g. >25%% deviation in scope, scheduled completion date, cost estimate, resource requirements	
	Financial Financial, budgetary	Loss of <\$25k or <2% of budget (whichever is less).	Loss of \$25k -\$249k or 2- 5% of budget (whichever is less).	Loss of \$250k-\$499K or 5-10% of budget (whichever is less).	Loss of \$500k -\$1m or 10-25% of budget (whichever is less).	Loss of >\$1m or >25% of budget (whichever is less).	
		Negligible impact on the LECC's ability to fund services or projects	Short term impact on the LECC's ability to fund services or projects.	Medium term impact on the LECC's ability to fund services or projects.	Long term impact on the LECC's ability to fund services or projects.	Severe impact on the LECC's ability to fund services or projects. Requires State or Federal intervention.	

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	1. 2.	Consequence Definitions			
	Insignificant	Minor	Moderate	Major	Severe
Compliance Legislative, regulatory, contractual, complaints	Negligible statutory or regulatory breach or complaint, no warning, no penalty. Negligible legal consequences. Negligible breach of contract. Resolved by day to day management.	Minor statutory or regulatory breach, minor complaint. Potential for litigation with likely favourable outcomes that can be resolved by day to day management. Contract breach with only minor impact that can be resolved by day to day management.	Statutory or regulatory breach and moderate fines. Warning or Improvement Notice issued. Likely litigation with uncertain outcomes. ELT intervention required. Contract breach with manageable penalties. ELT intervention required.	Serious statutory or regulatory breach with fines and public exposure Litigation with probable negative outcomes Contract breach with penalties that cannot be absorbed within current budget	Significant statutory or regulatory breach resulting in staff dismissa Significant adverse judgement Contract breach with penalties that may result in significant damage to the LECC.
Environmental Environmental harm	Negligible environmental harm	Minor environmental harm and/or non-compliance impact	Short term environmental harm and/or non-compliance impact	Long term environmental harm and/or non-compliance	Irreparable long term environmental harm and compliance sanction
Reputation Perception, trust, credibility	Negligible adverse impact that can be remedied immediately	Adverse impact that is short-term	Adverse impact with potential for medium-term reputational and/or political damage	Impacts requiring long- term remedial attention Lasting damage to reputation and/or political standing	Irreversible political damage to brand and reputation
People Health and safety (physical or mental)	Potential for injury or illness requiring first aid treatment.	Potential for injury or illness resulting in medical attention and several days off work	Potential for injury or illness resulting in short-term hospitalisation	Potential serious long- term injury or illness	Potential for death, permanent disability or ill health

RISK DEFINITIONS - LIKELIHOOD TABLE

	Probability	Frequency
Almost Certain	The event is expected to occur. > 90% chance.	More than once a year.
Likely	The event will probably occur. 70%-90% chance.	Once a year.
Possible	The event may occur. 30%-70% chance.	Once in every 5 years.
Unlikely	The event is unlikely to occur but could occur in some circumstances. 10%-30% chance.	Once in every 20 years.
Rare	The event is very unlikely to occur in most circumstances. < 10% chance.	Once in every 50 years or more.

LECC RISK MATRIX

			Consequence	b	
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Low	Medium	High	Extreme	Extreme
Likely	Low	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	High
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Low	Medium	High

TERMS OF REFERENCE

OBJECTIVE

The objective of this review is to provide reasonable assurance that LECC's complaints assessment processes (including notification processes) are effective and undertaken in a timely manner in accordance with internal Key Measures of Success.

SCOPE

TOPIC	AUDIT FOCUS				
Policies	 LECC complaints assessment policies are up-to-date, compliant with legislation, and consistent with good practice 				
Accessible Information	 LECC has accessible information for the public to enable the receipt of complaints and explain what might happen if they complain 				
Complaints Recording	 LECC has procedures, systems and processes in place to ensure all complaints are captured, recorded and managed securely 				
Complaints Assessment	 Complaints are assessed confidentially, fairly and in a timely manner in accordance with internal Key Measures of Success 				
Accountabilities	 There are clear accountabilities for complaints assessment processes, including appropriate information and training 				
Information & Training	 LECC staff are aware of complaints assessment processes, including appropriate information and training 				
Monitoring & Continuous Improvement	 Complaints (including outcomes and trends) are monitored with the aim of improving systems and processes 				

APPENDIX 3

CENTIUM AUDIT TEAM

NAME	POSITION	INVOLVEMENT
Yas Wickramasekera	General Manager	Final Quality Assurance and Approval
Penelope Corkill	Practice Manager	Planning, Peer Review and Quality Assurance
Kelsey McNaughton	Senior Auditor	Planning, Fieldwork, Reporting

CLIENT KEY CONTACTS

NAME	POSITION	INVOLVEMENT
Aaron Bantoft	Director Investigation - Oversight	Planning, Agreed Management Action Workshop, Reporting
Sheena Pillai	Team Leader Assessments	Planning, Fieldwork, Agreed Management Action Workshop
Judy Greening	Registry Manager	Fieldwork, Agreed Management Action Workshop
Samantha Boukaram	Assessments Officer	Fieldwork
Lily Wozniak	Investigator Audits	Fieldwork

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NAME	POSITION	INVOLVEMENT
Clare Louise	Registry Coordinator	Fieldwork
Geoff van Herten	Director IT	Fieldwork
Tremaine Dickenson	IT	Fieldwork
Nick Athanasopoulos	A/Manager Human Resources	Fieldwork
Renee Ingrey	Associate to the Chief Commissioner	Fieldwork
Justine Simpkins	Manager Prevention and Education	Fieldwork

APPENDIX 4

AGREED MANAGEMENT ACTION PLAN

REF	AGREED MANAGEMENT ACTIONS	RISK RATING	WHO	DUE
1	Review the listed policies and procedures to ensure consistency with legislation and current practice; update policy / procedure history to reflect the review and include a date for future review.	Low	AaronB	30/10/19
2	Implement formal checking procedures to ensure all complaints received by Security staff are delivered to registry for registration and tasking (e.g. signature on transfer of the documents). Document new checking procedures to ensure all relevant staff understand the process and are aware of their responsibilities.	Medium	RaeleneJ	30/10/19
3	Clarify the daily allocation process for registering mail received. The process should be documented in a procedure to ensure all relevant officers understand the process and are aware of their responsibilities.	Medium	RaeleneJ	30/10/19
4	Review current procedures to increase the frequency and timeliness of independent checking processes to ensure complaints are registered in a timely basis.	Medium	RaeleneJ	30/10/19
5	Ensure the specifications of LOIS include an automated tasking workflow after registering complaints. In the interim, remind staff of the importance of tasking all complaints for assessment.	Medium	RaeleneJ	30/10/19
6	Update applicable policies and procedures to include the records management responsibilities of FA397. In the interim, ensure all officers are aware of their FA397 responsibilities regarding record destruction.	High	RaeleneJ	30/10/19

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REF	AGREED MANAGEMENT ACTIONS	RISK RATING	WHO	DUE
7	Partner with LECC's ICT specialists to design a report that captures all deleted emails from the "Contact Us" and "Complaints" email accounts. Institute processes to ensure that this report is reviewed by both the Registry Manager and an appropriate officer who does not have system access to the email accounts.	High	RaeleneJ with IT	30/10/19
8	Implement an independent checking process to ensure that all complainants receive written acknowledgement of their complaint where applicable.	Medium	AaronB	30/10/19
9	Reaffirm current Key Measures of Success with the Assessment team to ensure that all future complaints are acknowledged within ten business days	Medium	AaronB	30/10/19
10	Review existing processes to include independent checks at various milestones to ensure complainants are notified of the outcome of their complaint.	High	AaronB	30/10/19
11	Revise LECC's Complaint Assessment Procedure ascertain ongoing relevance and practicality, specifically the timeframe of 20 business days.	High	AaronB and Exec Committee	30/10/19
12	Clarify roles and responsibilities of staff involved in the complaint assessment process and update all applicable documentation (e.g. role descriptions, policies and procedures).	Medium	AaronB and RaeleneJ	30/10/19
13	Collaboratively design a process to capture basic information regarding all calls to the switchboard (e.g. date, time, name, call category, etc.) to enable call recordings to be readily accessed by appropriate staff. The process should be documented in a procedure to ensure all relevant officers understand the process and are aware of their responsibilities.	Medium	AaronB and RaeleneJ	30/10/19

LIMITATIONS

This report is prepared on the basis of the following limitations:

- Management Responsibility: Management is responsible for establishing and maintaining an effective system of internal control over its operations and financial reporting, including without limitation, systems designed to assure the achievement of its control objectives and compliance with applicable laws and regulations.
- Limitations: The matters raised in this report are only those that came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Our procedures were not designed to detect all weaknesses in control procedures as they were not performed continuously throughout the period and the tests performed are on a sample basis.
- Fraud: There is an unavoidable risk in any assurance project that fraud or irregularity may not be detected due to the limitations noted above. Our report therefore should not be relied upon to disclose fraudulent activities.

- Recommendations: Centium is not responsible for whether, or the manner in which, any recommendations made in this report are implemented. Your entity should assess our recommendations for their full commercial and operational impact before implementing them.
- Confidentiality: This report is confidential, has been prepared solely for the use by your entity and ownership of the report and any attachments lies with your entity.
- Responsibility: This report should not be quoted in whole
 or in part without our written consent. We disclaim any
 assumption of responsibility for any reliance on this report to
 any person other than management of the entity or for any
 purpose other than which it was prepared.
- Information Requests Costs: Costs of information requests under any "freedom of information" legislation such as the NSW Government Information (Public Access) Act, the Commonwealth Freedom of Information Act or subpoenas arising from actions taken by individuals or groups as a result of this report will be passed on to you.

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