

GWYNEDD COUNCIL

COMMITTEE	AUDIT COMMITTEE
DATE	22 NOVEMBER 2012
TITLE	OUTPUT OF THE INTERNAL AUDIT SECTION – “RECRUITMENT - IDENTITY CHECKS”
PURPOSE OF REPORT	TO RECEIVE THE COMMENTS OF THE HEAD OF HUMAN RESOURCES IN ACCORDANCE WITH THE REQUEST OF THE COMMITTEE
AUTHOR	DEWI MORGAN, SENIOR MANAGER AUDIT & RISK
ACTION	TO RECEIVE THE REPORT AND COMMENT ON THE CONTENTS

I. INTRODUCTION

- 1.1 The result of Internal Audit work on the Council’s arrangements of performing identity checks during the recruitment process was reported to the Audit Committee on 22 September 2012. The report to the committee included the executive summary of the internal audit report, which had been placed in a ‘C’ opinion category.
- 1.2 The Committee resolved **to invite the Head of Human Resources Department to the next committee meeting to explain the situation.**
- 1.3 Since the Head of Human Resources is unable to attend this meeting, he has met with the Chair and Vice-Chair of the Committee (as well as the Head of Finance and the Senior Manager Audit & Risk) on 8 November in order to explain the latest developments in the area, and presented evidence to show the progress that has been made to implement the report’s recommendations.

2. BACKGROUND

- 2.1 The internal audit was undertaken as part of the 2012/13 audit plan, with the purpose of ensuring that suitable arrangements exist for testing the identity of new appointments to the Council and that the arrangements are adhered to.
- 2.2 The main findings of the audit were:

A sample was taken of personnel files of officers that were newly appointed during the 2011/12 financial year. Of the selected sample of 25 files were in the care of Support Services - Personnel Administration. It was found that only 10 of these files included evidence that identity tests have been carried out. In addition, the letters sent to applicants referred to the incorrect legislation - the Asylum and Immigration Act 1996 rather than the Immigration, Asylum and Nationality Act 2006.

For the remainder of the sample, clarification was received from the officials who had responsibility for the management and administration of personnel files within the services. These officers confirmed that copies of identity checks were not kept on personnel files and some expressed that they did not believe that these tests are conducted.

It appears from the audit that no clear guidelines have been established for managers and officers who administrate personnel files on the arrangements, responsibilities and the importance of implementing and testing identity. Due to lack of evidence and guidelines, the auditor considers the Council does not have appropriate controls in place for managing the risk of illegal appointments.

2.3 The report's action plan contained 5 recommendations:

Recommendation A01: Personnel letters should be updated to ensure they are current and reflect changes in legislation and ensure that this will be established across the Council.

Recommendation A02: Good practice guidance for managers in relation to "Recruitment, Selection and Appointment" arrangements which include the arrangements for verifying evidence of entitlement to work in the UK should be placed on the intranet.

Recommendation A03: The action that should be taken before appointing new officers, including steps to check identity, should be publicised, ie the need to verify identity, provide a certified photocopy, together with noting who has the responsibility and accountability for maintaining these procedures.

Recommendation A04: The "Recruitment, Selection and Appointment" guidance should stress the importance of undertaking the checks as well examples of valid documents and the expected verifications in accordance with the Immigration, Asylum and Nationality Act 2006.

Recommendation A05: It should be ensured that records of identity checks are kept on file in order to ensure compliance with the Immigration, Asylum and Nationality Act 2006.

2.4 It can be confirmed that the Head of Human Resources has presented amended documents to the Chair and Vice-Chair of the Committee that address recommendations A01 to A04. The next step is to distribute these documents among Council managers and supervisors with the expectation that all relevant officers will act upon them. In doing this, recommendation A05 will also be implemented.

2.5 Internal Audit's intention is to undertake a follow-up audit before the end of December 2012 in the usual manner in order to provide independent assurance to the Committee that the recommendations have been implemented as expected.

3. RECOMMENDATION

3.1 The Committee is requested to accept this report as an explanation of the response of the Head of Human Resources to the Internal Audit report "Recruitment - Identity Checks".