Requires Improvement

ID and Title:	20 112 TfL Management System		
Engagement Sponsor:	Howard Carter, General Counsel	Strategic Risk:	ER13 Governance & control suitability
Business Area:	Information Governance	Date	18 Feburary 2021

Objective

The purpose of the audit was to provide assurance on the adequacy and effectiveness of the TfL Management System (TMS).

Scope

The scope of the audit included the following key areas of risk:
- Governance
- Change control process
- Management review and reporting

Issue overview

Total	Rating		
	High	**Medium**	**Low**
5	4	I	0

Summary of key findings and corresponding management actions

Finding	Management action
An absence of a recent executive mandate for the TfL Governance Framework and consequently the TMS.	Secure Executive Committee (ExCo) or TfL Committee approval for the TfL Governance Framework.
A lack of controls for SharePoint sites resulting in information being duplicated or replicated from the TMS.	Work with T&D to investigate the feasibility of using the Data Loss Prevention (DLP) application for SharePoint Online to prevent copying to other sites, and provide targeted communication for SharePoint site owners on the risks associated with uncontrolled duplication from the TMS.
Review requirements not being met or prioritised by business areas risks inaccurate or irrelevant standards, policies and procedures being used.	Introduction of an appropriate escalation process so that documents can be prioritised or allocated to management for review. Work with the Transformation team to ensure organsational change guidelines take account of documents in the management system, in order to help maintain system users, approvers and owners.
A large volume of documents in the TMS library are overdue for review. Automatic reminder notifications from the TMS have been disabled and there is no risk based approach on where to concentrate efforts.	Review the TMS Library's capabilities for managing overdue documents, including giving consideration to risk based ratings against overdue documents and re-installing automated reminders.

Conclusion

A number of key controls were inadequately designed and/or operating ineffectively. Based on these findings, we have concluded that the control environment requires improvement.

EVERY JOURNEY MATTERS

Introduction and background

- The TfL Management System (TMS) contains online content made up of Instructions and Guidance pages on Platform, as well as controlled documentation that provides policy, instruction, guidance standards and reference materials for managers and employees.
- The TMS SharePoint library houses all the controlled documents and complements the topics covered on the site, including Rule Books, Pathway documents, Engineering Standards, Procedures and Maintenance Work Instructions.
- Collectively, these instructions and guidance are referred to as Content and are described in the TMS content framework as;
  - Policies either TfL or operational instructions which are mandatory, written as a series of steps to be performed in a standardised way to achieve a defined objective and can be online instructions, procedure, process or guidance, reference documents providing factual information to understand the context in which instructions, policies or guidance is provided.
  - Standards set out in terms of expected levels of performance or the quality of assets, goods or services to be achieved to deliver policy objectives.
  - Specifications which are predominantly technical requirements and used to purchase goods or services.
  - Forms and templates which capture necessary information in a structured way.
- Content is controlled to ensure staff have the most up to date information to complete their work.
- Changes to Instructions and Guidance content or TMS documents are subject to the change control process and must be submitted using the change control form. There are 4388 documents in the TMS library (this excludes Maintenance Work Instructions).
- The introduction and launch of Platform in August 2020 was an intensive activity for the TMS team as approximately 70 per cent of content sat in the TMS. The TMS team spent the majority of 2020, whilst rotating on Furlough, configuring and migrating data, including moving TMS Libraries from SharePoint 2013 to SharePoint online.
- In September 2020, a new online Change Control tool was developed and than launched in December 2020.

Limitations or Restrictions

There were no notable limitations of scope, or restrictions placed on access to records, personnel and properties affecting our delivery timeline, organisational independence, or auditor objectivity.

HIGH

I.0 TfLGovernance Framework

Issue
General Counsel is accountable for the TfL Governance Framework which outlines in section 7 the TfL Management System (TMS), detailing what it comprises of, the need for controlled documentation to ensure consistency and the arrangements for managing its content. The document has not been mandated by the ExCo or an appropriate TfL committee following the TMS move from LU/SHE in 2016. This has contributed to some business areas not being represented within the TMS, the existence of multiple management systems and SharePoint sites used to hold information locally such as Safety Health and Environment (SHE) content within DLR, London Trams and Overground. Information held on these management systems does not link back to or reference the TMS, resulting in a duplication of documents that may become inaccurate or outdated. The issue is also due in part to TfL's culture of devolved responsibility, the operation of DLR, Trams and London Overground by concession holders and the lack of Technology & Data governance on the rollout and use of Sharepoint. Given numerous organisational transformations, TfL leadership re-confirming a mandate for the TMS could help give it the authority it needs to ensure business wide ownership and compliance.

Business risk impact
In the absence of a clear mandate from senior management for the TMS, its vision as the single source of truth is compromised with the potential for uncontrolled business and safety critical documents being used across the organisation.

Management action(s)			
#	Action	Owner	Due
1	Secure approval for the TfL Governance Framework to be mandated by ExCo or an appropriate TfL committee and then communicate it to the wider business.	Richard Osborn (Head of TMS, Information & Records Management)	31 August 2021

<div style="background:red">**HIGH**</div>

2.0 SharePoint Sites

Issue
SharePoint site requirements and guidance that must be followed before a request for a SharePoint site is made are outlined in the Using SharePoint Reference (Sept 2018) document, which refers to the SharePoint 2013 site. This includes not to duplicate or replicate instructions, guidance or any other information contained in existing Corporate SharePoint sites and applies to everyone in TfL, which including TMS and the TMS library. The following issues were identified: • SharePoint sites in Track, LU Skills Development, and SHE, hold duplicate policies and standards taken from the TMS without linking or referencing back to the TMS. Local teams create folders on their sites to save local copies of documents believing it is easier for people to access. • There are no online SharePoint controls in place to prevent copying or duplication of information to other sites from the TMS and no joint work undertaken with SharePoint Owners in the business informing them of the risks to help prevent this occurring. • The Records Management Quick Guide 6 (G2306 A3) – Information Governance and best practice for SharePoint provides an overview of information governance principles to be followed when working with any SharePoint platform. • With the launch of Platform in August 2020, users searching for a TMS document using the Platform search bar are given details of all documents across TfL including those held in local sites. This can create confusion for users searching for a TMS document and can be problematic where multiple versions of policies are found. The current SharePoint site governance is in the process of being rewritten by the TMS team and will address some of the concerns raised, including reminding SharePoint site administrators to avoid duplication. Similarly, the planned delivery of Platform Phase 2 this year is expected to look at implementing a more enhanced and targeted search functionality for staff.

Business risk impact
Where the business are duplicating or replicating information from TMS on their own SharePoint sites, it may result in inaccurate or outdated standards, policies, procedures or guidances being used.

Management action(s)			
#	Action	Owner	Due
2	Work with T&D on the feasibility of applying Data Loss Prevention (DLP) to SharePoint Online to prevent copying or duplication to other sites.	Richard Osborn (Head of TMS, Information & Records Management)	31 December 2021
3	Deliver targeted communication for SharePoint owners on the risks of duplication and work with them to; include health warnings (where applicable) on local site information being	Richard Osborn (Head of TMS,	30 June 2021

#	Action	Owner	Due
	uncontrolled or potentially not the latest version, identify duplicate documents ensuring they are replaced with links to the TMS.	Information & Records Management)	
4	The Records Management Quick Guide 6 (G2306 A3), should include a reference to Learning Paths.	Richard Osborn (Head of TMS, Information & Records Management)	30 April 2021
5	TMS team to undertake annual mini audits on a sample of sites to assess the effectivenss of the above targeted communication with SharePoint owners and share with sharepoint owners to address any issues identified.	Richard Osborn (Head of TMS, Information & Records Management)	31 August 2021

Management action(s)

3.0 Controlled documents

Issue

TMS library houses all controlled documents on the TMS. As of 8 January 2021 this was made up of 4388 documents, of which 2213 were overdue having gone past agreed review dates. Business areas with the highest number of documents are:

- LU Asset Operations (Maintenance) which has 2422 documents, of with 1540 are overdue
- Engineering which has 781 documents, of which 355 are overdue

Assigned accountable individuals in the business are responsible for keeping their controlled documents up to date on TfL's behalf. However, we identified the following issues:

- When such a person moves on or leaves the organisation, this information is not always captured, with business areas failing to notify the TMS team, resulting in gaps and inaccurate information on the TMS Library.
- The Joiner & Leavers list produced by Business Services is not used consistently by the TMS team to help maintain system users, approvers and owners. Access to this alone does not fully address the issue of movers and team changes within the organsation.

Testing of 20 overdue controlled documents in the TMS library identified the following issues:

- Business areas failed to meet their review deadlines by three -12 years
- 11 documents had no revised review plans in place, this includes:
  - Design And Installation Of Fire Protection Systems And Compartmentation
  - Measures Providers Of Medical Assessment For Track Certification And Other Safety Critical Certification Purposes
  - Asset Risk Standard
  - Licensing of Fire Detection Engineers (to work on LU systems)
  - Power Delivery - Competency and licensing
- The Accessible Communications Policy had no business owner

The TMS team has no documented escalation process in place to address the issue of overdue documents and relies on the TMS Managers making repeated contact with action owners in the business (the accountable employee for reviewing the document) and escalating using their own judgement in response to a lack of ownership by the business.

Business risk impact

If controlled documents in the TMS Library are not kept up to date on TfL's behalf, it may result in employees using standards, policies and procedures that are inaccurate or irrelevant.

Management action(s)

#	Action	Owner	Due
6	Develop and implement an appropriate escalation process.	Richard Osborn (Head of TMS, Information & Records Management)	31 October 2021

#	Action	Owner	Due
	Management action(s)		
7	Revised review plans need to be put in place for the 11 documents identified in the audit.	Richard Osborn (Head of TMS, Information & Records Management)	31 May 2021
8	Work with the Transformation team to ensure organisational change guidelines take account of documents in the management system, in order to help maintain system users, approvers and owners.	Richard Osborn (Head of TMS, Information & Records Management)	31 December 2021
9	Identify an appropriate business owner for the Accessible Communications Policy	Jo Parry (Management Systems Manager)	31 May 2021

HIGH

4.0 TMS Library

Issue
TMS library houses all controlled documents on the TMS, and as at 2 November 2020 there were 4388 documents in total of which 1141 had a review completion date before 31 December 2020.

Data on overdue documents is exported from the TMS Library by TMS Managers for their areas of responsibility, and used to identify and follow up individual documents with accountable persons in the business.

Our review of the TMS library identified the following issues:
- An absence of any priority rating or risk based assessment for documents which could assist TMS Managers and business areas to concentrate their efforts on the most critical documents.
- The 'criticality rating' column for documents in the library is not used.
- Automated reminder notification function for overdue documents generated from the TMS Library had been disabled by the the former Head of TMS, in response to complaints from senior managers about the volume of emails generated.
- The large volume of overdue documents in LU Asset Operations (1540) and Engineering (355) risks potential safety or business critical documents not always being followed up by the responsible TMS Manager. |

Business risk impact
An ineffective follow up process for managing overdue documents risks potentially business critical, safety and/or regulatory requirements being missed or remaining out of date for an inappropriate length of time.

Management action(s)			
#	Action	Owner	Due
10	Review the TMS Library's capabilities for managing overdue documents, these include giving consideration to: • Priority rating/or risk based rating against overdue documents • Use of 'criticality' column • Re-installment of the automated reminders	Richard Osborn (Head of TMS, Information & Records Management) & TMS Managers	31 August 2021
11	A reconfiguration of the automated reminder notification should be undertaken to allow TMS Managers to be the initial recipient	Richard Osborn (Head of TMS, Information & Records Management) & Jo Parry (Management Systems Manager)	31 May 2021

`MEDIUM`

5.0 Management reporting

Issue
Reports on overdue documents are produced by the Management System Analysts using data extracted from the TMS Library. These reports are then shared with stakeholders in the business by the TMS Managers. The following issues were identified: • The reporting process is complex and onerous. It involves exporting raw data from the TMS library to Microsoft Excel, filtering for each directorate by review dates so that graphs and workbooks can be prepared for periodic reporting to a limited audience. • The reports are produced principally for relevant stakeholders identified by the TMS Managers for their business areas and are not sufficiently targeted to senior management to address any issues within their areas. • There is a lack of oversight of overdue priority and safety critical standards, policies and procedures at ExCo or committee level.

Business risk impact
Ineffective reporting of overdue documents to senior management may result in priority and safety critical documents becoming inaccurate or irrelevant and expose the business to unnecessary risks.

#	Action	Owner	Due
Management action(s)			
12	Review and simplify the reporting process including redesigning business level information and identifiying a targeted approach to senior management reporting.	Richard Osborn (Head of TMS, Information & Records Management)	31 May 2021
13	Identify an appropriate group to receive oversight of priority and safety criticial overdue documents.	Richard Osborn (Head of TMS, Information & Records Management)	31 July 2021

Finding	Indicative Business Impact of Control Weakness (Linked to Enterprise Risk Assessment Matrix (ERAM))	ERAM
High	Severe weaknesses in key business controls	Very High
		High
Medium	Moderate weaknesses in key business controls	Medium
Low	Minor weaknesses in key business controls	Low
		Very Low

	Overall conclusion categories
Conclusion	Description
Well Controlled	There is no cause for concern. • There is a sound system of internal control designed to meet the organisation's objectives; • Controls are consistently applied in all areas reviewed; • Assurance mechanisms are effective, and would identify any reduction in internal control to ensure action is taken to maintain risk within acceptable tolerances.
Adequately Controlled	There is no cause for concern. • There is generally a sound system of internal control designed to meet the organisation's objectives; • Controls are generally applied consistently, however, minor weaknesses in the design or the inconsistent application of controls may put the achievement of a particular objective at risk; • Assurance mechanisms are effective/ partially effective, and should identify reduction in internal control to maintain risk within acceptable tolerances.
Requires Improvement	There is some cause for concern. • Weaknesses in the design, and/ or the inconsistent application of internal controls put the achievement of the organisation's objectives at risk • Assurance mechanisms, do not exist or are partially effective/ ineffective, and may fail to identify reduction in internal control to maintain risk within acceptable tolerances.
Poorly Controlled	There is serious cause for concern. • Fundamental weakness in the control design and/ or consistent non-compliance with control requirements could result/ has resulted in failure to achieve the organisation's objectives in the area reviewed • Assurance mechanisms do not exist/ have failed to identify reduction in internal control to maintain risk within acceptable tolerances.

Distribution list

This report was sent to Howard Carter, General Counsel, by Mushtaq Ali, Interim Head of Internal Audit, and copied to:

Name	Title
Richard Osborn	Head of TfL Management System, Information & Records Management
Richard Bevins	Head of Information Governance & Data Protection Officer
Jo Parry	Management Systems Manager
Caroline Sheridan	Director of TfL Engineering and Asset Strategy
Esther Sharples	Interim Director of Asset Operations
Tim Morrison	Interim Director of R&E
George Clark	Chief Engineer
Jon Fox	Director of Rail & Sponsored Services
Lilli Matson	Chief Safety, Health & Environment Officer
Antony King	Group Finance Director
Michelle Abod	PA to the Group Finance Director
Simon Kilonback	Chief Finance Officer
Paul Mason	Head of Treasury and Group Insurance
Andrea Clarke	Director of TfL Legal
Clive Walker	Director of Risk and Assurance
Howard Carter	General Counsel
Polly Lethbridge	Senior Risk Manager
John Russell	Risk Manager
Richard Mullings	Head of Counter-Fraud and Corruption
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