
Report to Audit Committee

Date of Meeting: 30 September 2021

Subject: Building Security: Update

Report by: Strategic Director Partnership & Performance

1.0 Purpose

- 1.1. On the 19 April 2019, the Audit Committee agreed to follow up a report on Building Security as a result of an Internal Audit report that provided No Assurance. An update report was prepared for Audit Committee in April 2020, however, as a result of the global pandemic that meeting was cancelled. This report provides the Audit Committee with an update on the current situation.

2.0 Recommendations

- 2.1. Audit Committee is asked to challenge, comment on and note the report.

3.0 Considerations

- 3.1. On 19 April 2019, a report was presented to Audit Committee by the Internal Audit team that reported No Assurance following an audit of Building Security. An action plan was agreed, and officers gave a commitment to come back to Audit Committee with a progress report in the year following.
- 3.2. In November 2019, Internal Audit undertook a further tranche of unannounced visits to 10 operational buildings. Robust security arrangements were found to be present in the majority of buildings sampled, indicating a level of improvement; however, unauthorised access was gained to 3 buildings. The full report is attached at Appendix 1.
- 3.3. Whilst Internal Audit has shifted its assurance rating from No Assurance to Limited Assurance as a result of the improving position, there remained a number of shortcomings in building security arrangements.
- 3.4. The non-compliant buildings included a primary school, an adult services resource centre and Alloa Town Hall. More reassuringly, robust security measures were found at 7 other buildings, which included: primary schools/nurseries, children's accommodation, Fir Park and the Spiers Centre.
- 3.5. Improvement actions are being implemented to address the areas of concern. At Alloa Town Hall physical security measures are being enhanced and staff

awareness is being raised. At the resource centre, similar action on staff awareness has been taken, physical door security has been reviewed, and in the longer term, consideration is being given to relocating the reception desk. At the primary school, the improvement actions relate to improving staff awareness and enforcing existing established security arrangements.

- 3.6. More generally, two refresher sessions have been held for duty holders on their roles and responsibilities, with another planned before the end of 2021.
- 3.7. A building security action plan was agreed in 2018/19. Progress is ongoing, with further information provided at Annex 6 of the attached Internal Audit report; however, this has been significantly disrupted as a result of resource displacement on to the ongoing pandemic response activity. The main areas delayed relate to a new security policy and support guidance and training for staff. Covid restrictions have also meant that a proportion of the Council estate is still not open to the public in the way it had been prior to the pandemic.
- 3.8. Internal Audit intends to undertake further unannounced visit to continue to test the integrity of building security arrangements as resources and Covid restrictions allow.
- 3.9. There are no direct financial implications arising from this report.

Conclusions

- 3.10. Whilst there has been demonstrable improvement in building security arrangements across the Council's estates portfolio, a report by Internal Audit in early 2020 highlighted that further work remains. Whilst some improvement work has been progressed, it has been disrupted by significant resource displacement on to the ongoing Covid response. Colleagues in the Internal Audit team have indicated that they will continue to test the integrity of building security arrangements as resources and Covid restrictions allow.

4.0 Sustainability Implications

- 4.1. Ensuring the security and integrity of the Council's property assets is integral to organisational sustainability.

5.0 Resource Implications

5.1. Financial Details

- 5.2. The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate. Yes

- 5.3. Finance have been consulted and have agreed the financial implications as set out in the report. Yes

5.4. Staffing

6.0 Exempt Reports

6.1. Is this report exempt? Yes (please detail the reasons for exemption below) No

7.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) **Our Priorities** (Please double click on the check box)

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all
Our families; children and young people will have the best possible start in life
Women and girls will be confident and aspirational, and achieve their full potential
Our communities will be resilient and empowered so that they can thrive and flourish

(2) **Council Policies** (Please detail)

8.0 Equalities Impact

8.1 Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?
Yes No Not applicable

9.0 Legality

9.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

10.0 Appendices

10.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1 - **INTERNAL AUDIT –BUILDING SECURITY – FINAL REPORT**

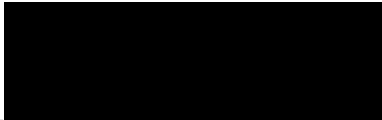
11.0 Background Papers

11.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)
Yes (please list the documents below) No

Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Stuart Crickmar	Strategic Director	2127

Approved by

NAME	DESIGNATION	SIGNATURE
Stuart Crickmar	Strategic Director	



MEMO

To: All Strategic Directors

Copy To: Nikki Bridle, Chief Executive
Lindsay Thomson, Senior Manager Legal and Governance
Gordon O'Connor, Internal Audit Manager

From: Graham Templeton, Senior Internal Auditor

Date: 14 January 2020

Subject: **INTERNAL AUDIT –BUILDING SECURITY – FINAL REPORT**

- **Building Security Arrangements; and**
- **Follow up of 2018/19 Review of Building Security Arrangements**

1. The purpose of this review was to:

- evaluate and report on the adequacy of the controls in place to ensure that Clackmannanshire Council's operational buildings, and the contents therein, are secure (see paragraphs 4 – 11, and Annexes 2 - 5); and.
- follow up on progress with implementing the recommendations from our 2018/19 review of Building Security Arrangements (see paragraphs 12 – 13, and Annex 6).

2. This review formed part of our 2019/20 Internal Audit coverage, agreed by the Audit Committee in April 2019.

3. Based on the full sample of buildings visited, we can provide **LIMITED ASSURANCE** in relation to the adequacy of building security arrangements. The assurance category definitions are at **Annex 1**.

4. We undertook unannounced visits to a sample of 10 operational buildings and reviewed the physical security measures in place at each building to prevent unauthorised access. Particular emphasis was placed on buildings in which vulnerable people (eg, pupils and elderly residents) were users. These visits took place on 13 and 18 November 2019.

5. Robust security measures were found to be in place to prevent and deter unauthorised access to the majority of the sampled buildings. These included a combination of two or more of the following controls:

- perimeter fencing around the building and its grounds;

- remote locking entry doors to the main reception area;
- locked and secure external doors (eg, fire exits); and
- CCTV cameras.

6. Table 1, below, sets out the buildings visited during the course of our review, and the outcomes from attempts to gain unauthorised access to the buildings (and their contents).

Table 1: Operational Buildings Visited by Internal Audit

Building	Internal Audit Gained Unauthorised Access
Alloa Town Hall	Yes
Cemetery Building (Tullibody)	No
Clackmannan Primary School	No
Resource Centre (Whins Road)	Yes
Ski Centre (Fir Park)	No
Speirs Centre	No
Sports Pavilion (Clackmannan)	No
Tillicoultry Primary School	Yes
Tullibody South Campus	No
Woodside Terrace	No

7. We did find several security weaknesses that require to be addressed. These were as follows:

Alloa Town Hall

- unauthorised entry was gained through a fire exit at the side of the building that was unlocked. Thereafter, access was gained to the auditorium area of the Town Hall.

Resource Centre (Whins Road)

- unauthorised entry was gained to the Resource Centre through the kitchen door that was unlocked. Thereafter, access was obtained to several areas of the Resource Centre. Internal Audit were in the building for c3 minutes before presenting themselves at the reception having walked through the Resource Centre.

Tillicoultry Primary School

- unauthorised entry was gained to the school through the kitchen door that was unlocked. Once inside the kitchen area we introduced ourselves to one of the kitchen staff and they directed us towards the reception area. They did not escort us to reception. Thereafter, access was obtained to several areas of the school. Internal Audit were in the building for c2 minutes before presenting themselves at the Headteachers office having walked through the school.

8. Recommendations relating to our findings are set out at **Annexes 2 - 4**, along with the management responses received, and confirmation that all the recommendations have been implemented.

9. This is the second consecutive year that we have carried out a building security review with the specific intention of assessing the potential for gaining unauthorised access. Over this period we have been able to bypass the physical security measures and gain access to five buildings that are used by pupils or the elderly. For four of these buildings we gained access through unlocked kitchen doors.

10. Therefore, despite the steps that have been taken corporately to raise staff awareness and vigilance of building security (see paragraph 13), we **recommend** that all Premises Duty Holders are instructed to specifically review the physical security measures on all external doors that lead to kitchen areas and ensure these are secure and locked at all times. If needed, the necessary corrective action should be taken to ensure these are secure and locked at all times. The completed action plan relating to this recommendation is at **Annex 5**.

11. It is our intention to revisit all four of these buildings (and potentially others) in early 2020 to ensure that the necessary corrective action has been taken and that the external kitchen doors are secure and locked at all times.

Follow up of 2018/19 Building Security Arrangements

12. In May 2018, Internal Audit issued a report on building security arrangements. The report contained four recommendations that were subsequently agreed with the then Corporate Management Team. We reviewed the progress recorded on Pentana for these recommendations and noted they have not been fully implemented. The implementation of these recommendations is in progress and their current status is recorded at **Annex 6**.

13. There has been a range of action taken corporately since the 2018/19 audit to raise staff awareness and vigilance. Some of these were reported to the Audit Committee in April 2019¹ and include:

- a workplace security briefing was reissued on the intranet and communicated to all staff via a management cascade in early 2019;
- briefings were provided to head teachers as duty holders for school premises and work on duty holders' roles and responsibilities continues through the Council's Health and Safety executive;
- intranet page on Connect (Safety and Your Security) provides supervisors and staff with a range of information and advice on building security; and
- Premises Duty Holders have been appointed and a Handbook, to assist in fulfilling responsibilities effectively, has been issued.

Graham Templeton
Senior Internal Auditor
14 January 2020

¹ [Building Security - Report to Audit Committee - 25 April 2019](#)

DEFINITION OF ASSURANCE CATEGORIES

Level of Assurance	Definition
Substantial assurance	The systems for risk, control, and governance are largely satisfactory, but there is some scope for improvement as the present arrangements could undermine the achievement of business and/or control objectives and/or leave them vulnerable to some risk of error/abuse.
Limited assurance	The systems for risk, control, and governance have some satisfactory aspects, but contain a number of significant weaknesses that are likely to undermine the achievement of business and/or control objectives and leave them vulnerable to an unacceptable risk of error/abuse.
No assurance	The systems for risk, control, and governance are ineffectively designed and/or are operated ineffectively such that business and/or control objectives are not being achieved and the risk of serious error/abuse is unacceptable. Significant improvements are required.

ALLOA TOWN HALL
FINDINGS AND ACTION PLAN
DATE OF VISIT: 18 NOVEMBER 2019
(Premises Duty Holder – Leisure Coordinator)

Audit Findings	Recommendation(s)	Agreed Management Action	Responsible Owner(s)
<p>We gained unauthorised access to the building through a fire door to the side of the building that was unlocked.</p> <p>Thereafter, access was gained to the auditorium area of the building.</p> <p>We exited the building and then entered the building through the side entrance. We were met by the caretaker who had seen us on the CCTV entering the side entrance.</p> <p>The caretaker then accompanied us during a tour of the building.</p>	<p>Management should review building security arrangements. In reviewing these arrangements:</p> <ul style="list-style-type: none"> • the practice of leaving the fire door at the rear of the building unlocked should stop immediately; • consideration should be given to whether the CCTV should also cover the front entrance; and • consideration should be given to installing an intercom system at the side entrance door. 	<p>Recommendation Implemented</p> <p>Notices added to remind staff and member of the public to keep fire doors closed.</p> <p>Ongoing discussions with property services to provide further CCTV coverage.</p> <p>Intercom system installed on 19 December 2019.</p>	<p>Leisure Coordintaor</p> <p>Senior Housing Officer</p> <p>Senior Housing Officer</p>

RESOURCE CENTRE (WHINS ROAD)
FINDINGS AND ACTION PLAN
DATE OF VISIT: 13 NOVEMBER 2019
(Premises Duty Holder – Team Manager)

Audit Findings	Recommendation(s)	Agreed Management Action	Responsible Owner(s)
<p>We gained unauthorised access to the building through the kitchen door to the rear of the building that was unlocked.</p> <p>Once inside the building we were able to walk through the building unchallenged despite wearing no ID.</p> <p>Internal Audit were in the building for c3 minutes before presenting themselves at the reception having walked through the Resource Centre.</p> <p>The main entrance door to the Resource Centre is left open when the building is in use. In addition, there is:</p> <ul style="list-style-type: none"> • no fob access system installed; and • no intercom system outside the main door for visitors to initially contact the main reception. <p>We notified the Resource Worker that we had been able to gain unauthorised access to the building.</p>	<p>Management should review building security arrangements. In reviewing these arrangements:</p> <ul style="list-style-type: none"> • the practice of leaving the kitchen door unlocked should stop immediately; • consideration should be given to installing a fob access system to the main external and internal doors; • consideration should be given to installing an intercom system at the main entrance door; and • the current location of the reception should be reviewed, in particular, the fact that reception staff are not located next to, or in direct sight of, the main entrance door. 	<p style="text-align: center;">Recommendation Implemented</p> <p>All staff issued with briefing on building security on 03 December 2019. Will be subject to discussion at team and 121 meetings.</p> <p>It is not normal practice for the kitchen door at the rear of the building to be left unlocked. The circumstances surrounding this particular occasion have been highlighted to staff.</p> <p>A Health and Safety Report, in September 2019, highlighted the need for a secure door entry system. This has been the situation since the building opened in 1989. Discussions with the Council's Maintenance Officer agreed that an interim door entry system is to be fitted.</p> <p>In the longer term, moving reception 12 metres from its current location to the front of the building will, following a feasibility study, be part of a capital bid for refurbishment. The main entrance to the building is not left open (two automatic doors / infrared door sensor allow entry).</p>	<p>Team Manager</p> <p>Team Manager</p> <p>Team Manager / Maintenance Officer</p> <p>Team Manager</p>

TILlicOUNTRY PRIMARY SCHOOL
FINDINGS AND ACTION PLAN
DATE OF VISIT: 18 NOVEMBER 2019
(Premises Duty Holder – Headteacher)

Audit Findings	Recommendation(s)	Agreed Management Action	Responsible Owner(s)
<p>We gained unauthorised access to the building through the kitchen door to side of the building that was unlocked.</p> <p>Once inside the building we introduced ourselves to one of the kitchen staff and they directed us towards the reception area. They did not escort us to reception.</p> <p>Internal Audit were in the school for c2 minutes unaccompanied before presenting themselves at the Headteachers office having walked through the school.</p> <p>We notified the Depute Hedteacher that we had been able to gain unauthorised access to the building.</p>	<p>Management should review building security arrangements. In reviewing these arrangements:</p> <ul style="list-style-type: none"> • the practice of leaving the kitchen door unlocked should stop immediately; • all staff, including non Education Services staff, should be reminded of their individual responsibility for building security and that all visitors should be escorted to reception. 	<p>Recommendation Implemented</p> <p>All visitors needing access to the kitchen will be required to sign in at the front entrance and be escorted to the kitchen.</p> <p>Kitchen staff are responsible for supervising the kitchen door while goods are brought in. The door is then locked immediately by kitchen staff.</p> <p>All staff, including non teaching staff are made aware of their responsibilities re security, as employees of the Council. All staff sign to confirm that they understand their responsibilities.</p>	<p>All office and kitchen staff</p> <p>All kitchen staff</p> <p>All staff members at Tillicoultry Primary School</p>

**REVIEW OF BUILDING SECURITY ARRANGEMENTS 2019/20
CORPORATE FINDINGS AND ACTION PLAN
NOVEMBER 2019**

Audit Findings	Recommendation(s)	Agreed Management Action	Responsible Owner(s)
<p>This is the second consecutive year that we have carried out a building security review with the specific intention of gaining unauthorised access.</p> <p>Over this period we have been able to bypass the physical security measures and gain access to five buildings that are used by pupils or the elderly. For four of these buildings we gained access through unlocked kitchen doors.</p>	<p>All Premises Duty Holders should be instructed to specifically review the physical security measures on all external doors that lead to kitchen areas and ensure these are secure and locked at all times. If needed, the necessary corrective action should be taken to ensure these are secure and locked at all times.</p>	<p>All Premises Duty Holders will be instructed to specifically review the physical security measures on all external doors that lead to kitchen areas and ensure these are secure and locked at all times.</p>	<p>Strategic Leadership Group</p>

**REVIEW OF BUILDING SECURITY ARRANGEMENTS 2018/19
CORPORATE FINDINGS AND ACTION PLAN
UPDATED ACTION PLAN – JANUARY 2020**

No	Audit Findings	Recommendation	Management Response	Responsible Officer	Status at January 2020
1.	<p>Roles and Responsibilities Corporately, there is no officer with overall responsibility for developing, disseminating, and enforcing Building Security standards. This has lead to a disjointed approach to security throughout the Council's operational estate.</p>	<p>Overall responsibility for developing, disseminating, and enforcing Building Security standards should be agreed.</p>	<p>New Senior Manager (Property) will have strategic responsibility for Building Security. Post due to be filled following related organizational redesign consultation.</p>	<p>Strategic Director (Place). - Pending appointment of Senior Manager (Property)</p>	<p>Implementation in Progress Being taken forward by the new Senior Manager (Property).</p>
2.	<p>Security Standards and Guidance There is no corporate security guidance. Any security guidance that is in place is on a per building basis and is limited to the control of visitors. There is no clear desk policy.</p>	<p>Giving the findings arising from our visits to a sample of operational premises, consideration should be given to the adequacy of current security guidance. This should include the potential need for professional expertise to assist with the development of robust security standards (including the preparation of a Security Risk Assessment and Action Plan for key operational buildings).</p>	<p>New Senior Manager (Property) will be responsible for sourcing professional expertise to assist with the development of robust security standards and guidance.</p>	<p>Strategic Director (Place). - Pending appointment of Senior Manager (Property)</p>	<p>Implementation in Progress Being taken forward by the new Senior Manager (Property).</p>

No	Audit Findings	Recommendation	Management Response	Responsible Officer	Status at January 2020
3.	<p>Building Security Incident Policy A policy is not in place setting out the definition of a 'security breach' and the process for recording, investigating, and reporting these breaches. This may lead to a lack of understanding over what constitutes a security breach, an inconsistent approach to investigating and reporting security breaches, and ultimately, a failure to share lessons learned so that similar issues are not encountered at other Council premises.</p>	<p>A formal and comprehensive Building Security Incident Policy should be prepared. Once finalised, the Policy should be disseminated to relevant staff, with training provided if required.</p>	<p>A policy will be prepared that aligns with reporting health and safety incidents at work.</p> <p>Staff development will be provided once the policy is agreed.</p>	<p>Strategic Director (Partnership and Performance)</p>	<p>Implementation in Progress</p> <p>Building Security incidents can be captured on the Health and Safety incident form.</p> <p>The Council's Emergency Resilience Officer is currently working on a draft Building Security Policy which will be consulted on in line with agreed processes before review and agreement by the Executive Health and Safety Committee.</p>

No	Audit Findings	Recommendation	Management Response	Responsible Officer	Status at January 2020
4.	<p>Building Security Training None of the staff that we spoke to during our visits had received any training on their roles and responsibilities in relation to building security.</p>	<p>Corporate training requirements in relation to building security should be reviewed.</p>	<p>This will be reviewed in the context of training for duty holders.</p>	<p>Strategic Director (Partnership and Performance)</p>	<p>Implementation in Progress Building Security is included in the Premises Duty Holder Training. All Headteachers went through this training in March 2018 and two sessions of training were held in June 2019. There are eight premises Duty Holders who currently require to have this training and a session is in the process of being arranged for them (some of these have only taken up post in the last few weeks). A full Training Needs Analysis for all Health and Safety related issues is currently being undertaken and security will be one of the issues included. This is expected to be completed around March 2020. Following this work will be undertaken to ensure that suitable training is available to meet the identified need(s).</p>

