Ministry of Business Innovation and Employment

ADEPT System Design Assessment
Internal Audit report

July 2023

pwc

Hilary Sharp
General Manager, Internal Assurance
Ministry of Business, Innovation and Employment

28 July 2023

ADEPT System Design Assessment internal audit report

Dear Hilary,

In accordance with our Consultancy Services Order (CSO) dated 25 October 2022, we have completed our internal audit assessment of the ADEPT System Design. Our observations and findings described in this report are based on the work performed between November 2022 and January 2023, and first issued as a draft report on 23 February 2023. Since this time we have been working through feedback, and following media activity in May 2023 we have made enquiries with the business to understand whether there was no evidence the ADEPT system and supporting controls had not operated as designed.

I would like to take this opportunity to acknowledge and thank the Ministry of Business, Innovation and Employment (the Ministry), and Immigration New Zealand personnel for the time and contributions they have made to enable us to perform this engagement.

Please feel free to contact us if you have any questions or require any further information.

Yours sincerely

James Rees-Thomas | PwC New Zealand (Wellington) | Partner

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1   Executive Summary

Executive Summary

Background

Immigration New Zealand's (INZ) strategic direction over the past decade has laid the foundation for a modern immigration system that is customer focused, flexible, consistent and cost-effective. As part of this evolution, the Advanced Digital Employer-led Processing and Targeting (ADEPT) system was developed to deliver digital services for INZ, starting with visa processing of Visitor Visas on 31 January 2022 and 2021 Resident Visa (2021RV) on 1 March 2022.

Currently, ADEPT is being used to process applications for several visa types, such as:

- Visitor Visa
- 2021 Resident Visa
- Accredited Employer Work Visa, including Employer Accreditation and Job Check

ADEPT is designed to support the previously manual processing of visa applications by applying logic to the Immigration Instructions and automating some manual or repetitive activities.

Objective and scope

The objective of this engagement was to understand and assess the risks and controls in place to enable the end-to-end process for applying, assessing and completing visa applications in ADEPT. The scope of this engagement included system controls within ADEPT and manual controls in the Standard Operating Manuals (SOM) to support the stable and secure operation of the platform.

Our work focused on RV2021 visa applications, as this was the predominant visa type using ADEPT when planning was agreed. Where appropriate we have tested controls relating to other visa activity within ADEPT during fieldwork. For details on the scope and approach, please refer to Appendix A.

During our work we were made aware of known challenges relating to ADEPT. We understand that these challenges are related, or more closely aligned, to the underlying ADEPT technology, rather than the visa processing business processes and controls. These challenges, and other technology-focused risk areas, will be further explored in a future internal audit following the business' completion of remediation activity that is currently underway. These known challenges include:

- seemingly duplicate visas issued under a single application
- processing of medical information causing delays
- an absence of clarity on the status of applications within the system
- production defects and bugs impacting the visa application process operating as designed.

Our approach

We interviewed a range of key stakeholders across INZ and worked collaboratively with the Ministry's Internal Assurance team, supported by a member of INZ's Risk and Assurance Team, to obtain an end-to-end understanding of the key processes and risks, and to identify associated controls of the ADEPT system. Our overall approach was to provide observations and recommendations on an exception basis, with no opinion or level of assurance provided.

We then completed walkthroughs to identify any gaps between the design understanding we had obtained and how the controls had been implemented in practice. Please refer to Appendix A for the limitations of our scope, approach and procedures across the scope areas.

Our fieldwork was performed between November 2022 to February 2023.

Key messages – Needs Improvement

INZ has established a useful foundation of controls that support the processing of 2021RV and other visa types through ADEPT (refer to Appendix C for key controls identified across ADEPT). Overall, we identified four observations from our control testing, including three with a "Necessary" rating, and one "Beneficial" recommendation. We did not identify any "Urgent" items. We also observed an overall high degree of alignment between the previously manual visa process and the process built in to ADEPT.

Specific strengths we observed include:

- Automated system rules in ADEPT to generate the Dynamic Application Form are designed to align with the Immigration Rules and were observed to appropriately:
  - Adjust the fields an applicant is required to populate in real-time, based on information the applicant enters in each prior field
  - Once an applicant's identity has been resolved raise activities for manual review based on the information entered.
- Process documentation continues to evolve as ADEPT is developed and further refined.
- System-enforced controls prevent a visa from being issued without manual activities being completed, and random quality checks are performed for a sample of applications to confirm appropriate actions were undertaken.

Key Messages

The following outlines the four key phases of a visa application that is processed through ADEPT. As part of our understanding of processes, risks and controls, we have outlined what good practice would expect and what we saw in the processing of visas through ADEPT.

Submit Application	Process Application	Quality Check	Application Decision	Oversight and management

What good practice would expect:

ADEPT generates appropriate application forms, enabling the applicant to provide all required information to INZ ahead of beginning the application process.	ADEPT generates appropriate activities for Immigration Officers to complete.	Quality checks are well documented, and training and support is provided where systemic errors/issues are identified as part of quality assurance processes.	Controls within ADEPT prevent the issue of visas where an application has incomplete information and/or activities.	Visa applications are consistently managed and processed in a timely manner.

What we saw:

✔ Based on application rules, ADEPT generated a dynamic application form that collected all the required information needed to begin a visa application.	✔ Our testing across a range of different application scenarios found ADEPT appropriately generated activities across identity, character, and health information for Immigration Officers and appropriate personnel to complete example. ✔ Process documentation continues to evolve as ADEPT is developed and further refined.	✔ Risk Quality (RC) or Random Sampling Quality Checks (RSQC) activities are automatically raised by the ADEPT system rules and completed by Technical Advisors ✔ ADEPT was not able to process an application further until Quality Check (QC) activities were marked as complete. ▢ Note: the main focus of our internal audit was on RV21, which as a residence visa initially had 100% QC in line with SOPs. A risk-based decision was made in June 2022 to exclude applications approved under 'settled' criteria. We understand Risk & Assurance performed post-decision reviews across all applications, and all declines were subject to QC - please note the operation of these controls were not tested within this assessment. ▢ Note: the current quality check controls are designed to provide INZ leadership with confidence over operational effectiveness and compliance of the wider system, but are not designed (or intended) to identify all errors or mistakenly issued visas.	✔ ADEPT appropriately raised finalisation procedures that checked for outstanding activities yet to be completed ahead of a visa being granted.	✔ Management are working to resolve known issues with the standard reporting from ADEPT.

Findings that impact relevant phases

Finding 1 – ADEPT's activity-based functionality is not being used for applications, as designed

Finding 2 – ADEPT's operational dashboard reports do not help management identify where controls are not operating and/or service levels are not being achieved

Finding 2

Finding 3 – Proactive and efficient integrity monitoring or reporting of changes to application master data or access to applications is not performed as information is not readily available

Finding 4 – ADEPT has missed an opportunity to improve INZ's ability to raise and manage actual or perceived conflicts of interest between staff and an applicant

Key Findings & Next Steps

The key visa application processes and controls have been built into ADEPT and we did not identify any key issues relating to the operational controls, based on our targeted testing. However risks have been identified around how the system is being used in operation, and limitations with supporting and enabling controls

Necessary	**ADEPT's activity-based functionality is not being used for visa applications, as designed** The new visa application process was designed to allocate activities to the next available Immigration Officer for the majority of applications. The business have not used the activity-based processes as designed due to their concerns this would lead to inefficiencies and double handling of applications, and instead continue to process all visas on an application basis (i.e. allocated to a single Immigration Officer to process end-to-end). Although this is not circumventing ADEPT's system controls designed to safely process applications in line with policy, this operating approach has impacted the effectiveness of the enabling controls supporting ADEPT and increased usability and efficiency issues with the new system. We understand INZ management are currently investigating options to address these concerns with the business, for example, combining relevant activities together to increase processing efficiencies.	Perform root cause analysis on the causes of reported inefficiencies and usability issues reported by Immigration Officers.
	ADEPT's operational dashboard reports do not help management identify where controls are not operating and/or service levels are not being achieved Limited operational reporting was designed and delivered in ADEPT's initial roll out. Since release, teams have been developing their own reporting to augment ADEPT's dashboards, and have shared these with their peers to varying extents. However INZ's ability to consistently, accurately and efficiently track application status across all products and teams in order to identify where activities are overdue for INZ action (i.e. within INZ's control to resolve) and to understand where current applications are awaiting further input from applicants or third parties (i.e. not within INZ's control) remains limited. Separate external reporting tools are in place to provide metrics to senior leadership and external stakeholders.	Agree requirements for centralised operational dashboard reporting, and implement. Utilise reporting to improve proactive monitoring of controls to quickly resolve any activities awaiting INZ input.
	Proactive and efficient integrity monitoring or reporting of changes to application master data or access to applications is not performed as information is not readily available Although technical data changes can be extracted from the underlying platform, this is not in a format appropriate to identify integrity issues, or to enable proactive monitoring of high-risk applications. The current "audit reporting" is not as detailed as what is provided by AMS. The business is currently investigating enhancements to audit reporting.	Investigate if reporting can be enhanced to produce reports of changes to applications, and record who has accessed and viewed applications and/or activities. The Ministry and INZ to consider who will implement and proactively monitor of unusual and high-risk activity.
Beneficial	**ADEPT has missed an opportunity to improve INZ's ability to raise and manage actual or perceived conflicts of interest between staff and an applicant** As with AMS, reliance is placed on environmental controls to manage conflict of interest (e.g. policy and culture which is outside the scope of this internal audit). ADEPT functionality has not enabled application specific conflict of interest management declarations to further reduce the risk in this area.	Perform a risk assessment of the full suite of INZ's conflict of interest controls to confirm this is within Leadership's appetite. We have provided some examples for system-enabled controls to consider for future enhancements.

2 Detailed Findings

Detailed Findings

1. ADEPT's activity-based functionality is not being used for visa applications, as designed.

What we found

With the introduction of ADEPT, INZ adopted a new operating model for processing visa applications. Previously, an entire visa application would be assigned to an Immigration Officer who would be responsible for assessing the application from end-to-end. Under the new model, in most circumstances, ADEPT has been designed to place all applications into an activity pool aligned to each stage of the application process (refer to the Process Map in Appendix B), and Immigration Officers are allocated activities from a blind activity pool, regardless of whether they have performed a previous activity for that application. ADEPT also supports the "old style" application processing, though this was intended to be used as an exception process, such as when evaluating visa applications for a visiting sports team.

The business have not used the activity-based processes as designed due to their concerns this would lead to inefficiencies and double handling of applications, and instead have continued to process all visas on an application basis (i.e. allocated to a single Immigration Officer to process end-to-end). This decision was based on a trial conducted by Immigration Managers and Officers in the Christchurch office. Immigration Managers and Officers, we met with expressed a general consensus that this was their preferred approach to processing a visa application. The key reason cited was the inefficiencies of reviewing the same supporting evidence multiple times, resulting in applications taking longer to process. We understand no formal analysis or benchmarking has been performed to evidence this. We identified there was no documentation or formal sign-off from INZ leadership for moving from an activity to an application-based process, and there is a disconnect between INZ Leadership and Immigration Manager and Officers' view on how to effectively and efficiently process visa applications through ADEPT.

As a result, the activity-based operating model is not operating as intended due to the lack of buy-in and compliance from Immigration Managers and Officers.

Why it's important

Although this is not circumventing ADEPT's system controls designed to safely process applications in line with Standard Operating Manuals (SOMs), this operating approach has impacted the effectiveness of the enabling controls supporting ADEPT and increased usability and efficiency issues with the new system.

We understand INZ management are currently investigating options to address these concerns with the business, including considerations on how to combine activities to reduce any real or perceived double-handling.

Recommendation

1.1 Perform root cause analysis on the causes of reported inefficiencies and usability issues reported by Immigration Officers, i.e.

- Review the current design of the activity-based model by collaborating with Immigration Managers and Officers to understand the perceived inefficiencies

- Based on feedback obtained, implement a strategy to update ADEPT that resolves any inefficiencies or communication gaps identified

- Educate and communicate to Immigration Managers and Immigration Officers on the required processes to follow in ADEPT

- On a periodic basis complete a survey or review to assess if ADEPT and the related processes are providing an effective and efficient approach to processing visa applications.

Management comment

We are taking an "iterative approach" to this issue. There are items on the ADEPT work programme which will help INZ begin to address this – we are combining the risk and purpose assessments for visitor visas which are currently separate tasks in ADEPT but essentially require the same assessment (this will be in place 30 July), and we are creating market-based capability groups to allow immigration officer to specialise in applications from specific countries (August/September). This is the first step in the process, following this we will need to review whether further change is needed and look at doing similar changes to AEWV processing.

Owner*: These actions are initially assigned to Stephen Vaughan, Chief Operating Officer, as chair of the Adept Governance Group. The Adept Governance Group will determine and assign action owners and dates as appropriate.*

Action date: *As above*

Detailed Findings (continued)

2. ADEPT's operational dashboard reports do not help management identify where controls are not operating and/or service levels are not being achieved

What we found

We interviewed five Christchurch-based Immigration Managers, Visa Operations Managers, and Immigration Officers to understand how visas were processed through the ADEPT system from their perspective. We identified that standard dashboard reporting from the ADEPT system did not support Immigration Managers to manage application activities and the caseload of Immigration Officers in an efficient manner.

INZ's ability to consistently, accurately and efficiently track application status across all products and teams in order to identify where activities are overdue for INZ action (i.e. within INZ's control to resolve) and to understand where current applications are awaiting further input from applicants or third parties (i.e. not within INZ's control) remains limited. Dashboards available to Immigration Managers and Officers have the following challenges:

- Limited oversight of applications delayed within the system
- Standard dashboard reporting is time-consuming to review, resulting in delays to make decisions for caseloads of Immigration Officers
- Limited oversight of responses received for requests for information or potentially prejudicial information, resulting in significant manual intervention to understand if applicants are moving along in the process, including an inability to:
  - See responses received to a Potentially Prejudicial Information request
  - Identify verification Officer responses, documentation, and finalisation activities that belong to an Immigration Officer
  - Effectively drill down and see general notes in a visa application that an Immigration Officer creates
- No list of visa applications an Immigration Officer has assessed and what visa conditions are linked to each of them
- No list of applications where a quality check or a random quality check has been generated and its status, and any rework an Immigration Officer has to complete.

Limited operational reporting was designed and delivered in ADEPT's initial roll out. Since release, teams have been developing their own reporting to augment ADEPT's dashboards, and have shared these with their peers to varying extents. Separate external reporting tools are in place to provide metrics to senior leadership and external stakeholders.

Why it's important

Despite the current work being undertaken to resolve the known issues within individual teams, the risk remains that applications being processed within ADEPT are not managed in a consistent manner. This can result in key processing activities being overlooked or inappropriately prioritised, impacting the timeliness of determination and communication of an application's result.

Recommendation

2.1 Agree requirements for centralised operational dashboard reporting, and implement, i.e.

- Review the dashboard in consultation with Immigration Managers and Officers to understand their dashboard reporting requirements for managing visa applications, including identifying what can be leveraged from custom dashboards now being used by teams
- Investigate options for updating the central dashboard to improve the management of applications, and update as practicable.

2.2 Utilise reporting to improve proactive monitoring controls to quickly resolve any activities waiting INZ input.

Management comment

Agree with the recommendations.

There is a dashboard in development for management which we expect will address this recommendation.

Owner: *This action is initially assigned to Stephen Vaughan, Chief Operating Officer, as chair of the Adept Governance Group. The Adept Governance Group will then assign action owners and dates as appropriate.*

Action date: *30 December 2023*

Detailed Findings (continued)

3. Proactive and efficient integrity monitoring or reporting of changes to application master data or access to applications is not performed as information is not readily available

What we found

Although technical data changes can be extracted from the underlying platform, this is not in a format appropriate to identify integrity issues, or to enable proactive monitoring of high-risk applications. The current "audit reporting" is not as detailed as what is provided by AMS.

Through our review and testing, controls within ADEPT exist to capture changes to application master data and record these changes. We observed ADEPT system records for a sample of RV2021 applications that provided a clear audit trail of:

- what fields a change was made to
- the history of the change
- who and when the change was made.

However, ADEPT does not have the functionality to extract this information or produce reporting on data changes. This prevents INZ management from proactively monitoring, validating and interrogating potential unauthorised changes to data within ADEPT. The current design of ADEPT does not improve on capability previously available within AMS; ADEPT only allows for the searching of data changes on a case-by-case basis, whereas AMS enable INZ to extract audit trails.

We also note that ADEPT does not record user access records or views for a visa application or activity. We would expect this information to be captured to enable management to periodically monitor and identify users who may have inappropriately accessed an applicant's record and confirm INZ and the Ministry comply with their obligations under the Privacy Act 2022.

Why it's important

Proactive monitoring is a beneficial detection control for INZ to identify potentially inappropriate access to visa applications and/or activities. Without such controls, INZ is unable to gain sufficient confidence that staff are complying with code of conduct policies, and upholding integrity, independence, objectivity to process visa applications, and obligations under the Privacy Act 2022.

The business is currently investigating enhancements to audit reporting.

Recommendation

3.1 Enhance reporting to produce reports of changes to applications, and record who has accessed and viewed applications and/or activities, i.e.

- Develop a report of master file data changes from ADEPT to allow management to monitor changes to visa applications and/or activities.
- Configure the ADEPT system to enable user access recording and reporting.

3.2 Implement proactive monitoring of unusual and high-risk activity, i.e. Perform periodic reviews of master file data within ADEPT to identify users who may have inappropriately accessed an applicant's record.

Management comment

Agree with recommendations. A solution for this is in the pipeline. It has not yet begun but is recognised as a necessary requirement.

Owner: *This action is initially assigned to Stephen Vaughan, Chief Operating Officer, as chair of the Adept Governance Group. The Adept governance Group will then assign action owners and dates as appropriate.*

Action date: *December 30 2023*

Detailed Findings (continued)

4. ADEPT has missed an opportunity to improve INZ's ability to raise and manage actual or perceived conflicts of interest between staff and an applicant

What we found

With the design of ADEPT, INZ has not taken the opportunity to introduce system controls to raise and manage potential conflicts of interest between an Immigration Officer and/or Manager and a visa applicant. INZ and the Ministry is solely reliant on self-identification and notification by immigration staff to raise any conflicts in line with MBIE's Code of Conduct and other policies. Our testing also identified that INZ Quality Checks (Quality Checks and Random Sampling Quality Checks activities) do not consider conflicts of interest.

An assessment of INZ's broader conflict of interest controls and processes was not in scope for this internal audit.

As noted in Finding 1, INZ adopted a new activity-based operating model under ADEPT. This was designed with controls to mitigate some conflict of interest risk by separating out the activities involved in processing a visa application into discrete, independent activities able to be completed by any available Immigration Officer. However, as this model is not currently being used the effectiveness of these controls for managing conflict of interest risks are limited.

Why it's important

Remaining independent during the assessment of visa applications is critical for INZ to maintain integrity and ensure applicants are not subject to undue bias. By not following the new operating model, conflict of interest risks are not being appropriately mitigated and may expose INZ to heightened risks of actual or perceived conflicts of interest in processing visa applications. This may result in reputational damage to INZ and, if an actual conflict of interest is found, should result in a review of the application and potentially change the visa outcome.

Recommendation

4.1 Perform a risk assessment of the full suite of INZ's conflict of interest controls to confirm this is within Leadership's appetite.

Some possible system-enabled controls to consider for future enhancements include:

- Introduce a mandatory declaration process that must be completed by Immigration Managers and Officers prior to performing an application activity manually assigned to them or self-selected from an activity pool (i.e. not blind pull)
- Investigate options to integrate the conflict of interest declaration into ADEPT. This may be in the form of a pop-up window with mandatory checkboxes and/or fields for declaring the absence or presence of a conflict of interest.
- INZ and the Ministry to consider periodic quality reviews of declared conflicts of interest against visa applications to ensure compliance with the Ministry's Code of Conduct policies.

 Management comment

We note that the level of risk associated with conflicts of interest has not increased with the implementation of Adept but has remained the same as it was with AMS. Our action here will be to update the Standard Operating Procedures used by Immigration Officers to specifically address the procedure for dealing with Conflicts of Interests where visas are being processed in Adept.

Owner: *This action is initially assigned to Stephen Vaughan, Chief Operating Officer, as chair of the Adept Governance Group. The Adept governance Group will then assign action owners and dates as appropriate.*

Action date: *December 30 2023*

3 Appendices

Appendix A: Scope, Objectives and Limitations

Scope and objective

The scope of this engagement was split into two phases.

The objective of phase one of this engagement was to perform an end-to-end process review of the controls in place to support the processing of 2021RV through ADEPT.

The scope of this engagement is limited to the processing of 2021RV through ADEPT and will include consideration of:

- the ADEPT technology platform and the key processes and controls that support the processing of 2021RV applications through the ADEPT system and ensure stable and secure operation of the technology
- the risk controls incorporated in the SOM to confirm their adequacy to support the stable and secure operation of the platform.

Phase two will identify the key controls in place to support the ADEPT technology platform and assess their design effectiveness and identify any potential gaps. This phase is anticipated to be completed in 2023.

Scope exclusions

The following processes and procedures are out of scope for the purposes of this engagement:

- IT processes supporting the confidentiality, availability, and integrity of the ADEPT system (including IT General Controls).
- Decisions of INZ staff relating to the consideration of visa applications.
- All aspects of ADEPT solution design or technology choices and any Governance bodies and processes that are not specific to the ADEPT platform.

Limitations

The selection of visa applications we referenced in our procedures did not include every rule and permutation possible.

For the 2021RV visas we identified that there were 3 critical elements that were to be assessed, they are:

1. Identity;
2. Character, including New Zealand Police check and, where required, a National Security Check; and
3. Health.

We focused our efforts and validated some ADEPT rules that we would expect to apply and result in identified controls to trigger. We did not test every rule that applied within ADEPT.
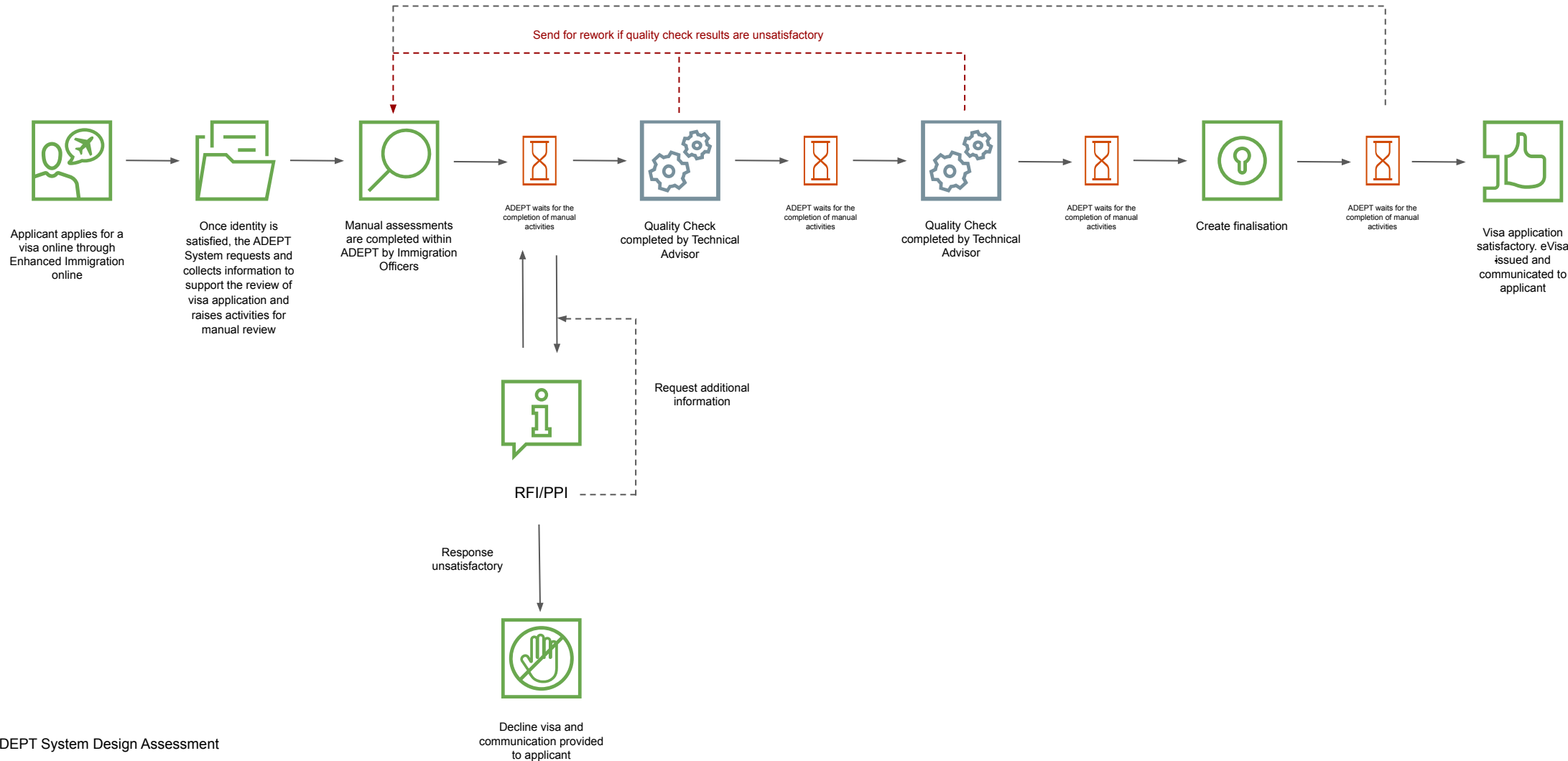
The validation of identified controls was completed in both a production and test operating environment. This was required as not all controls could be validated in a production environment. We confirmed the test environment to be the same as the production environment by enquiring with Management.

During our fieldwork, we identified that the ADEPT system was reliant on manual activities to be completed by Immigration Officers, in turn, we confirmed that ADEPT appropriately raised manual activities for review by Immigration Officers. We did not assess, the decisions made by the Immigration Officer as part of the control activity.

Appendix B: Detailed Process Map

Outlined below is a process map of how a 2021RV application is processed through the ADEPT system.

All activities must be completed for visa to be issued

Send for rework if quality check results are unsatisfactory

Applicant applies for a visa online through Enhanced Immigration online

Once identity is satisfied, the ADEPT System requests and collects information to support the review of visa application and raises activities for manual review

Manual assessments are completed within ADEPT by Immigration Officers

ADEPT waits for the completion of manual activities

Quality Check completed by Technical Advisor

ADEPT waits for the completion of manual activities

Quality Check completed by Technical Advisor

ADEPT waits for the completion of manual activities

Create finalisation

ADEPT waits for the completion of manual activities

Visa application satisfactory. eVisa issued and communicated to applicant

Request additional information

RFI/PPI

Response unsatisfactory

Decline visa and communication provided to applicant

Appendix C: Key in-scope controls identified across ADEPT

The following matrix includes the key controls identified across the ADEPT system that were within the scope of this engagement.

Process	Control Identified	Description	Prevent/ Detect	Automated/ Manual
Application Submission	1. Product integration testing	As visa product is integrated into the ADEPT system, relevant testing is completed to ensure all data capture, process and outputs are accurate and complete for visa applications to be processed in line with immigration rules.	Prevent	Manual
	2. ADEPT creates assessments for manual review	When a visa application is submitted and identity is resolved, the ADEPT system automatically creates an activity for manual review to be completed by an Immigration Officer to assess relevant supporting information for an element of the visa application. Based on immigration rules per visa policies, a series of rules are built into the ADEPT system and once triggered, a flag for manual review activity is raised by ADEPT for Immigration Officers to complete. Assessments within ADEPT can only be completed by an Immigration Officer and appropriately qualified personnel e.g. Special Assessment Team and Identity Team.	Detect	Automated
Process Application	3. Immigration Officer completes a manual review based on activity raised by ADEPT	An Immigration Officer completes activities created by the ADEPT system to assess the visa application.	Prevent	Manual
	4. Support Officer and the Identify Team completes a manual review based on activity raised by ADEPT	A Support Officer and the Identity Team complete activities raised by the ADEPT system when the Photo Quality Check (PQC) has failed 3 times. This is to ensure the photo identification provided by the applicant is of acceptable quality.	Prevent	Manual
Quality Checks	5. Quality checks are completed by Technical Officers	A Technical Advisor completes a quality activity of a visa application based on either of the following instances: 1) if the activity completed by an Immigration Officer is required to be reviewed based on experience; and/or 2) is randomly selected for review by the ADEPT system.	Detect	Manual
Application Decision	6. All activities within ADEPT must be completed before the application outcome is communicated	When a visa outcome is to be communicated to an applicant, all relevant activities must be adequately completed and closed within the ADEPT system to ensure the application decision is complete.	Prevent	Automated

Appendix D: Observation Ratings

Overall Report Rating:

Immediate Action Required	• Key controls are either not adequately or appropriately designed and are not operating effectively, or there is an absence of appropriate key controls to support objectives and manage risks. • One or more **Urgent** findings [OR] the combined **Necessary** findings have a critical impact that requires immediate action. Corrective action and oversight by leadership is required immediately.
Needs Improvement	• A few key control weaknesses were noted that require enhancements to better support business objectives and manage risks. • Combination of Necessary and Beneficial findings. Corrective action and oversight by leadership is needed.
Effective	• Key controls are adequately and appropriately designed, and are operating effectively to support objectives and manage risks. • Audit recommendations resulted in only minor enhancements to the effectiveness or efficiency of controls and processes. • One or more **Necessary or Beneficial** findings that Internal Assurance does not consider significant. Corrective action and oversight by leadership is encouraged.

Individual Findings Priority Rating:

Urgent	An observation that identified an intolerable risk and typically addresses a significant control weakness of a critical control or the wider control environment. Requires immediate Management attention for risk decision with appropriate mitigation and timeline. Internal Assurance will track and follow-up on agreed management actions.
Necessary	An observation that identified a tolerable risk in the short to medium term and typically addresses a control weakness of a non-critical control or an opportunity to improve a critical control. Requires Management attention for risk decision with appropriate mitigation and timeline. Internal Assurance will track and follow-up on agreed management actions.
Beneficial	An observation that identified low impact risk for a business output or objectives or an opportunity to improve and mature the overall efficiency and effectiveness of process, system, capability and governance etc. Requires Management consideration of benefit, cost and risk. Internal Assurance will not track and follow-up on agreed management actions.

Thank you

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