

Internal Audit Assurance

1. INTRODUCTION

- 1.1 The City of Edinburgh Council Internal Audit (IA) team performs one annual review to provide assurance over the controls established to mitigate certain key SEStran partnership risks.
- 1.2 The purpose of this paper is to provide an update on the outcomes of the 2019/20 SEStran IA review and to request the Partnership Board's insights on areas for potential inclusion in the scope of the planned 2020/21 audit.

2. SCOPE AND OUTCOMES OF THE 2019/20 INTERNAL AUDIT REVIEW

Audit Scope

- 2.1 The scope of the 2019/20 IA review assessed the design adequacy of governance arrangements and stakeholder engagement plans supporting the new Regional Transport Strategy (RTS) development and considered whether the project is being delivered in line with applicable guidance and legislative requirements.
- 2.2 The design adequacy and operating effectiveness of key third-party supplier management controls in relation to third parties engaged to support the new RTS was also considered.

Audit Outcomes

- 2.3 Whilst it is acknowledged that SEStran consistently delivers a portfolio of individual projects that is aligned with the objectives defined in the current RTS, the RTS rewrite project is a significant undertaking as it will provide a framework that guides the future long term management of, and investment in, transport across the SEStran geography, and must be aligned with applicable legislation and guidance.
- 2.4 Consequently, it is important to ensure that appropriate governance and risk management arrangements (including effective consultant management arrangements) have been established to support the project, providing the SEStran Board with assurance that all current transport related issues have been adequately researched and understood when preparing the MIR, and that the final RTS incorporates applicable legislation and guidance (where appropriate).
- 2.5 The audit highlighted that whilst some moderate control weaknesses were identified in the design of the governance and risk management frameworks

established to support delivery of the first stage of the SEStran regional transport strategy (RTS) rewrite project (the main issues report (MIR)), the established governance and risk management frameworks provide reasonable assurance that project risks are being managed, and that SEStran's objectives to deliver a new strategy based on MIR outcomes should be achieved.

- 2.6 The medium rated finding raised in Section 3, is a consolidation of minor governance exceptions associated with the risks of potentially insufficient scrutiny and oversight of the RTS project and the limited ability to identify and effectively manage project risks.
- 2.7 A number of areas of good practice were also identified that are applied by SEStran. These are included in the opinion section of the report (section 2).
- 2.8 The final audit report is included at Appendix 1.

3. 2020/21 INTERNAL AUDIT REVIEW

- 3.1 The Internal Audit team has now completed their 2020/21 annual planning process, and the draft plan will be presented to the Council's Governance, Risk, and Best Value Committee for review and scrutiny on 24 March 2020.
- 3.2 The draft annual plan includes Internal Audit review for SEStran, which is consistent with the level of assurance provided in prior years.
- 3.3 Initial discussions with SEStran management have highlighted the potential for IA to provide further assurance in relation to the risks associated with the ongoing development of the Regional Transport Strategy in 2020/21 review, with focus on how the RTS has considered and incorporated the future impacts of carbon neutrality and climate change.

4 **RECOMMENDATIONS**

- 4.1 The Board is requested to:
 - note the outcomes of the 2019/20 IA review;
 - confirm whether IA assurance in 2020/21 should focus on the adequacy and effectiveness of the framework supporting ongoing development of the Regional Transport Strategy (including carbon neutrality and climate change); and
 - provide insights in relation to any other key SEStran risks and areas of concern that should be considered for inclusion in the 2020/21 IA review.

Appendix 1: Internal Audit 2019/20 Report

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Policy Implications	None
Financial Implications	SEStran is charged an annual fee for provision of the annual IA assurance review. The fee for 2018/19 was £5,000.
	The fee for 2019/20 is currently being quantified and will be discussed and agreed with management prior to finalisation.
Equalities Implications	None
Climate Change Implications	None



Appendix 1

The City of Edinburgh Council Internal Audit

South East of Scotland Transport Partnership (SEStran)

Final Report 28th February 2020

OO1901

Overall report rating:

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This internal audit review is conducted for the South East Scotland Transport (SEStran) Partnership and is designed to help SEStran assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Public Sector Internal Audit Standards (PSIAS) and as a result is not designed or intended to comply with any other auditing standards.

Although there are a number of specific recommendations included in this report to strengthen internal control, it is management's responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of SEStran. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and the SEStran Partnership Board as appropriate.

1. Background and Scope

Background

Structure and Objectives

In accordance with <u>Transport (Scotland) Act 2005</u>, The South East of Scotland Transport partnership (SEStran) is the established statutory regional transport partnership for the South East of Scotland representing eight local authorities: City of Edinburgh; Clackmannanshire; East Lothian; Falkirk; Fife; Midlothian; Scottish Borders; and West Lothian.

SEStran is responsible for producing a Regional Transport Strategy (RTS) for the South East of Scotland. The first South East of Scotland RTS covered the period 2008 to 2023 and was refreshed in 2015 to ensure that the strategic approach to transport development across the SEStran geography remained realistic and achievable given availability of funding and resources.

The <u>refreshed RTS</u> covers the period 2015 to 2025 and includes four key objectives: to ensure transport facilities accelerate economic growth and regional prosperity; to improve accessibility for those with limited transport choices; to ensure developments are achieved in environmentally sustainable manner; and to promote a healthier and more active SEStran area population, and was approved by Scottish Ministers in July 2015.

The Regional Transport Strategy (RTS) rewrite project

In response to the pace of legislative change, economic growth, and the ongoing review and development of both national and local policies, SEStran has established a project to review and rewrite the RTS.

A paper titled' New Regional Transport Strategy' was presented to the June 2019 SEStran Partnership Board that outlined the planned project approach and included a high level project plan, timescales, and roles and responsibilities of project working groups.

The first stage of the project (preparation of the Main Issues Report (MIR), that will be used as a basis for development of the new RTS) is in progress, with an external consultant appointed to assist with MIR delivery.

In line with the requirements of the <u>Transport (Scotland) Act 2005</u>, SEStran is required to perform statutory consultation with a wide range of external stakeholders including bus and train operators; the NHS; School Children; professional bodies; equalities organisations when developing the new RTS.

RTS project management and governance

The following project management and governance structure has been established to support delivery of the RTS project:

- RTS Project Management Team (previously Officer Delivery and Working Group) responsible for operational management of the project, including management of contracts and consultants; approval of key deliverables; updating management on all contract and budget management and risks associated with the project; and ongoing communication with all working groups.
- RTS Steering Group a subgroup of the main SEStran Partnership Board that includes four volunteer SEStran board members. The Steering Group is responsible for constructive challenge, and provision of advice and support to the Project Management Team prior to reporting on RTS development progress to the Board.
- **SEStran Partnership Board** responsible for overall governance of the RTS project, including review of draft RTS content; review and challenge of key recommendations; approval of the draft

strategy prior to statutory consultation; and approval of the final strategy prior to submission to Scottish Ministers.

Legislation, policies and guidance

Development of the RTS will take into account Transport Scotland's <u>Scottish Transport Appraisal</u> <u>Guidance (STAG)</u> and the Transport Scotland policies and Scottish Government legislation detailed below:

- the <u>Transport (Scotland) Act 2005</u> that provides for the creation and functionality of new transport bodies enabling Scottish Ministers to discharge certain transport functions.
- The Scottish <u>National Transport Strategy (NTS)</u> first published by Transport Scotland in December 2006 and refreshed in January 2016. A further review has been performed and a <u>new national transport strategy</u> (NTS2) was published on 5th February 2020. NTS2 focuses on four key outcomes: equality; climate action; inclusive economic growth; and health and well-being. Carbon emissions is a key priority with a 75% reduction target to be achieved by 2030, and net-zero emissions by 2045.
- The <u>Strategic Transport Projects Review (STPR)</u>. The second STPR (STPR2) is designed to support delivery of draft NTS2 priorities and will inform transport investment in Scotland for the period 2022 - 2042 through provision of a programme of potential transport investment opportunities. STPR2 will influence the SEStran RTS as SEStran covers three of the STPR2 regions. STPR2 is expected to be finalised in early 2021.
- <u>The Planning (Scotland) Act 2019.</u> SEStran believes that linkage between planning and transportation is essential to support effective delivery of integrated transport solutions that will support both future development and sustainable travel.
- <u>The Transport (Scotland) Act 2019</u> includes a number of provisions relevant to RTS development, including creation and enforcement of low emission zones; improvement of bus services; introduction of Workplace Parking levies; and provisions for ticketing arrangements and schemes.
- The <u>Climate Change (Emissions Reduction Targets) (Scotland) Bill</u> was introduced in May 2018 to make provision setting targets for the reduction of greenhouse gases emissions, with a 75% reduction target by 2030 and a net-zero emissions target for 2045 and to make provision about advice, plans, and reports in relation to those targets.

Scope

The scope of this audit assessed the design adequacy of governance arrangements and stakeholder engagement plans supporting the new RTS development and considered whether the project is being delivered in line with applicable guidance and legislative requirements. The design adequacy and operating effectiveness of key third-party supplier management controls in relation to third parties engaged to support the new RTS was also considered.

Our areas of audit focus as detailed in our terms of reference are included at Appendix 2.

Testing was performed across the period June 2019 to February 2020.

Limitations of Scope

The scope of this review was limited to the assessment of the design of the overall project management and governance arrangements for the RTS rewrite project. The review did not provide assurance on the proposed scope, content, and quality of the new RTS.

Reporting Date

Our audit work concluded on 24 February 2020, and our findings and opinion are based on the conclusion of our work as at that date.

2. Executive summary

Total number of findings: 1

Summary of findings raised		
Medium	1. Regional Transport Strategy Project Governance and Management	

Opinion

Some Improvement Required

Whilst some moderate control weaknesses were identified in the design of the governance and risk management frameworks established to support delivery of the first stage of the SEStran regional transport strategy (RTS) rewrite project (the main issues report (MIR)), the established governance and risk management frameworks provide reasonable assurance that project risks are being managed, and that SEStran's objectives to deliver a new strategy based on MIR outcomes should be achieved.

The medium rated finding raised in Section 3, is a consolidation of minor governance exceptions associated with the risks of potentially insufficient scrutiny and oversight of the RTS project and the limited ability to identify and effectively manage project risks.

Whilst it is acknowledged that SEStran consistently delivers a portfolio of individual projects that is aligned with the objectives defined in the current RTS, the RTS rewrite project is a significant undertaking as it will provide a framework that guides the future long term management of, and investment in, transport across the SEStran geography, and must be aligned with applicable legislation and guidance.

Consequently, it is important to ensure that appropriate governance and risk management arrangements have been established to support the project, providing the SEStran Board with assurance that all current transport related issues have been adequately researched and understood when preparing the MIR, and that the final RTS incorporates applicable legislation and guidance (where appropriate).

Additionally, as the MIR is being delivered for SEStran by an external consultant, it is important to ensure that supplier management risks are effectively managed throughout the first stage of the project to confirm that agreed objectives are achieved to support the quality and timely delivery of the final MIR.

It is also important to ensure that the moderate control weaknesses identified in the design of the governance and risk management framework established to support delivery of the MIR by May 2020 are addressed to support delivery of the remaining stages of the project that are planned through to final delivery of the RTS to the Scottish Minister which is currently scheduled for December 2021, although this is dependent on finalisation of concurrent legislative processes. Further information on the findings and supporting Internal Audit recommendations are included at section 3 below.

Implementation of Internal Audit findings raised in previous audits

Our review also confirmed that the three low rated findings raised in 2018/19 audit of GDPR compliance and cyber security have been effectively addressed.

Areas of good practice

The following areas of good practice were also evident:

- a detailed procurement exercise was completed that included tendering for the appointment of consultants to deliver the Main Issues Report (MIR) stage of the RTS project. The Public Contracts Scotland web portal was used to support procurement process that ensuring that it was completed in alignment with Scottish Government Procurement guidance; and
- active ongoing engagement with key stakeholders was evident to support delivery of the MIR stage of the RTS project.
- SEStran currently chairs the Edinburgh and South East Scotland regional transport working group and is closely involved with Transport Scotland. This involvement should ensure that the RTS is developed in accordance with ongoing legislative and transport policy developments throughout the next phases of the project.

SEStran Management Response

The opinion is summarised by "Some Improvement Required", as is the overall report rating and this is broadly accepted and acknowledged.

The summary goes on to describe "some moderate control weaknesses" but concludes that there is "reasonable assurance" that a new strategy based on MIR outcomes should be achieved. The medium rating, as described in Appendix 1, includes phrases which include the words "....breach in laws and regulations " and "...would prevent SEStran being able to operate in the short term...". SEStran officials' view is that these aspects of the rating are inconsistent with the report's overall findings and the Auditor confirmed that their findings were established in relation to a "Moderate impact on SEStran's reputation...".

The auditors have recognised the fundamental importance of the RTS in terms of SEStran's role and this has influenced their approach to the audit; in that failure to deliver a robust RTS would have a significant impact on the organisation's reputation.

There are 6 itemised detailed findings in the audit covering project governance, project management responsibilities, risk management, progress reporting to the Board, project programme and management of the consultant employed to deliver the MIR and albeit understood that the MIR stage is essentially a prelude to the actual rewrite process, they have looked at the process as a whole, through to submission of the new RTS to the Scottish Ministers.

SEStran understands that each of the detailed findings, individually, would be rated as minor but their cumulative effect has resulted in a "medium" rating.

The governance related findings are based on a report on the RTS re-write intentions taken to the Partnership Board in June 2019 which represented what was foreseen at that time. However, a project such as the RTS rewrite is difficult to define fully, at a stage prior to being equipped with the knowledge that the MIR will provide and when viewed in retrospect, issues around governance and project management could and should have been clearer. It is also the case that SEStran's budget for next year has not yet been confirmed which is an impediment to future planning of the project.

The findings on risk management and on progress reports to the Board were discussed at some length with the auditor. SEStran has in place both a risk register, albeit generic, which contains an identified project delivery risk and a RAG (Red, amber, green) based project reporting format which is considered appropriate for most projects. However, the auditor's advice, in respect of the merits of both a project specific risk register and a more detailed report for significant projects, was accepted. In particular, the more detailed progress report would facilitate a greater degree of scrutiny by the Board.

The findings in respect of contract management were stated to be very minor, and SEStran had addressed them in ensuring that the full brief will be delivered by the agreed date. The City of Edinburgh Council 5 Internal Audit Report – SEStran – Annual Internal Audit Review Many of the required management responses to the findings raised will be covered in a report to the P&A Committee and Partnership Board later this month, including an update on progress, programme and introducing a specific risk register template.

Areas of good practice in procurement and in stakeholder engagement were noted.

3. Detailed findings

1. Regional Transport Strategy Project Governance and Management Medium

Review of the project governance and consultant management arrangements established to support the RTS project highlighted that:

1. **Composition of project governance forums and project groups -** the actual composition of the SEStran Partnership Board and RTS project Steering Group is not aligned with the structure detailed in the June 2019 Board paper introducing the RTS project and its proposed governance arrangements.

The June Board paper notes that membership of the SEStran partnership Board comprises the Partnership Director; the Strategy and Projects Officer; and three Board members, whilst actual membership includes 21 Board members. Similarly, the paper notes that the RTS steering group comprises the Partnership Director; the Strategy and Projects Officer; and three Board members, whilst accrual membership includes two Councillor Board members and two non-Councillor Board members.

 Project group responsibilities - the June 2019 RTS Board paper does not clearly differentiate between the RTS project groups established to support operational project delivery and those responsible for ongoing project governance, as all project forums (including the SEStran Partnership Board; the RTS Steering group; and the original SEStran Officer Delivery and Working Group) are described as Project Groups.

Management has confirmed that they are aware of the need to clarify the composition of governance and operational project forums and Project group responsibilities, and that these will be included in an update paper that will be presented to the Board in March 2020.

 Project risk management - whilst SEStran maintains an organisational risk register that includes a generic project management risk in relation to all SEStran projects, an RTS specific risk register or RAID log that captures RTS project Risks, Assumptions, Issues and Dependencies and that actions taken to manage and resolve these has not yet been developed.

Management has also noted that they have now established an RTS project RAID log template that will be populated and used to manage the risks, issues, and dependencies associated with subsequent RTS project phases.

- 4. Project progress reporting whilst SEStran presents a quarterly project status report to the Board that covers all ongoing SEStran projects and includes a high level overview of their progress with supporting red, amber, green (RAG) ratings, no detailed project dashboard has yet been established to support ongoing governance and oversight of RTS project delivery.
- 5. **RTS Project timeline** the project timeline has not been updated to reflect delays in the delivery with the first stage of project.
- 6. **Consultant management** review of key consultant deliverables for the main issue report (MIR) stage of the RTS project highlighted that these were not achieved in line with the agreed deliverables included in the contract as two deliverables were not provided by the agreed date.

Management has advised that alternative delivery arrangements were agreed, however, these were not recorded as outcomes from ongoing consultant status update meetings.

Risks

The potential risks associated with our findings are:

- Insufficient scrutiny and oversight of the RTS project by established project governance forums.
- RTS project risks, issues, and dependencies (including project delivery risks and dependencies associated with use of consultants) are not identified and effectively managed.

1.1 Recommendation: Composition and responsibilities of project forums and groups

Management should ensure that an update is provided to the Board that details the composition and respective responsibilities of the Regional Transport Strategy (RTS) project governance forums and groups.

1.1 Agreed Management Action: Composition and responsibilities of project forums and groups

Draft reports, covering these recommendations have been prepared and will be presented to the Performance and Audit Committee and the Partnership Board in March 2020.

Owner: Jim Grieve, Partnership Director, SEStran

Implementation Date: 31st March 2020

1.2 Recommendation: Project risk management and timeline

Project risk management: Management should develop a risk, issues, and dependencies (RAID) log, or an appropriate alternative that should be populated to include all new and emerging risks, known issues and dependencies that could potentially impact effective delivery of the Regional Transport Strategy project.

Risks identified should be assessed and scored based on their likelihood and impact and updated to include details of actions to be applied to address the risks, issues, and dependencies identified with actions allocated to appropriate owners for resolution and completion timeframes agreed.

The log should also be discussed and reviewed by an appropriate project group to enable identification of any new and emerging risks, issues, and dependencies, and progress with agreed actions to address those already identified.

Progress with addressing the most significant risks, issues, and dependencies should be included in ongoing project progress reporting to relevant project governance forums.

Project timeline: The project timeline should be regularly reviewed, discussed and updated by relevant project groups to ensure that the risk of slippage in delivery of key project milestones are identified, and timeframes reset.

Any project delivery risks identified should be included in the RAID log and also highlighted in the project dashboard / management information (refer recommendation 1.3) that is provided to relevant project governance forums for review and oversight.

1.2 Agreed Management Action: Project Risk Management

A risks, issues, and dependencies template has been prepared for use by the project management team to record progress with addressing the most significant Regional Transport Strategy risks, issues and dependencies, that will be reported to the SEStran Partnership Board.

The project timeline will be regularly updated and reviewed, with any potential delivery risks reflected in the RAIDS log.

Owner: Jim Grieve, Partnership Director, SEStran

Implementation Date: 1st June 2020

1.3 Recommendation: Project progress reporting

A project dashboard, or another appropriate format of project progress reporting should be established to support consistent ongoing project progress reporting for the duration of the Regional Transport Strategy project. This should include, but not be limited to:

- a project status assessment (for example, red, amber, or green) that is based on defined criteria, with supporting rationale provided for the overall project assessment.
- details of project delivery in comparison to key milestones recorded in the project timeline.
- confirmation as to whether the project remains within its allocated budget, with supporting rationale provided for any overspends incurred.
- confirmation that significant risks, issues and dependencies are being effectively managed.

1.3 Agreed Management Action: Project progress reporting

The existing SEStran Partnership Board reporting format will be developed to include these areas to provide the Board with the necessary information to support effective scrutiny.

Owner: Jim Grieve, Partnership Director, SEStran

Implementation Date: 30th June 2020

1.4 Recommendation: Consultant management

Variations from the agreed deliverables detailed in the contract for consulting services should be discussed and agreed at the regular status update meetings that have been established, with the agreed actions recorded and any risks identified noted as per the risk arrangements agreed in 1.2.

1.5 Agreed Management Action: Consultant management

These delivery changes were minor and were discussed and agreed by SEStran management and the Consultant. All significant contract variations are routinely recorded. Consequently, management accepts this risk.

Appendix 1: Basis of our classifications

Finding rating	Assessment rationale
Critical	A finding that could have a:
	 Critical impact on operational performance that would prevent SEStran from being able to operate in the long term*; or
	 Critical material monetary or financial statement impact in excess of external audit's financial statements materiality threshold that would impact SEStran's ability to continue as a going concern; or
	 Critical breach in laws and regulations that could result in material fines or long term consequences; or
	• Critical impact on the reputation of the organisation which could threaten its future (long term) viability.
High	A finding that could have a:
	 Significant impact on operational performance that would prevent SEStran from being able to operate in the medium term**; or
	 Significant monetary or financial statement impact in line with external audit financial statements materiality threshold that requires and adjustment to the financial statements;
	 Significant breach in laws and regulations resulting in significant monetary fines and medium term consequences; or
	• Significant impact on the SEStran's reputation that could threaten its future (medium term) viability
Medium	A finding that could have a:
	 Moderate impact on operational performance that would prevent SEStran from being able to operate in the short term***; or
	 Moderate monetary or financial statement impact that is below the external audit financial statements materiality threshold, but requires an adjustment to the financial statements; or
	 Moderate breach in laws and regulations resulting in moderate fines and short term consequences; or
	• Moderate impact on the reputation of the organisation that could threaten its future (short term) viability.
Low	A finding that could have a:
	 Minor impact on operational performance that does not prevent SEStran from being able to operate; or
	• <i>Minor</i> monetary or financial statement impact that is below the external audit financial statements materiality threshold, and does not require an adjustment to the financial statements; or
	Minor breach in laws and regulations with limited consequences; or
	• <i>Minor</i> impact on the reputation of the organisation that does not threaten its future viability.
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.

* Long term - a period of one year or more

** Medium term - a period of 3 to 12 months

*** Short term - a period of 1 to 3 months

Please see the Internal Audit Charter for full details of opinion ratings and classifications.

Appendix 2: Areas of audit focus

The areas of audit focus and related control objectives included in the review are:

Audit Area	Control Objectives
Project Governance	1.1 A project plan has been established to support the RTS rewrite project that is aligned with the key stages specified in the STAG and includes key deliverables (including timeframes for communication and publication of documentation) and dependencies for completion of each stage.
	1.2 A risks, assumptions, issues, and dependencies (RAID) log has been established and is maintained that details any risks, assumptions, issues and dependencies that could potentially impact project delivery, together with responsibilities and timelines for their ongoing management and resolution.
	1.3 Appropriately skilled and experienced internal and external resources have been allocated to support delivery of the new RTS within the required timeframes.
	1.4 Project governance forums include members, with relevant project management knowledge and transport strategy experience.
	1.5 Terms of reference have been established for project governance forums, that detail the composition of members, their roles and responsibilities, meeting frequencies, and upward reporting responsibilities to the main Board.
	1.6 Sufficiently detailed agendas and minutes / action logs are prepared for governance forum meetings.
	1.7 Complete and accurate management information (MI) has been established to support progress reporting to governance forums. This should include (but not be limited to) project progress and details of any significant RAIDS items that could adversely impact upon project delivery.
	1.8 There is a clearly established escalation process to ensure that all significant RAIDS items impacting project delivery are escalated, and appropriate solutions identified and implemented.
	1.9 There are adequate arrangements in place to ensure that ongoing policy and legislative changes are identified and incorporated in the new RTS development process.
Third party supplier – Contract management	2.1 Procurement documentation for engagement of external consultant specifies the necessary qualifications, skills and experience required.
	2.2 A legally binding contract has been established to support the consultancy arrangements. This includes but is not limited to following aspects,

	 Consultant's roles and responsibilities including the extent of resources /information required from SEStran
	 Deliverables in terms of quality and timescales
	 Frequency and content of the status update reporting and meetings
	2.3 SEStran management performs effective ongoing oversight of all third party consultants engaged to support the new RTS project and takes appropriate action to address any performance and delivery issues.
	3.1 Relevant stakeholders and external agencies that are required to be consulted, have been identified.
Stakeholder management	3.2 A consultation timeline has been developed and published and shared with stakeholders.
	3.3 Progress with achievement of consultation timeframes is regularly monitored as part of established project governance processes.
	3.4 Detailed documentation detailing consultation outcomes is produced and reviewed to identify any significant themes or trends.
	3.5 All significant consultation themes and trends are included in project deliverables (where appropriate).