

Internal Audit Report

Port Facility Security Plan – Annual Review

23 September 2025

PL2503

Overall Assessment	Reasonable Assurance
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This Internal Audit review is conducted for the City of Edinburgh Council under the auspices of the 2025/26 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2025. The review is designed to help the City of Edinburgh Council 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 Global Internal Audit Standards (UK Public Sector) and as a result is not designed or intended to comply with any other auditing standards.

Although there are 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 the City of Edinburgh Council. 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 elected members as appropriate.

Executive Summary

Engagement conclusion and summary of findings

There is generally a sound system of governance, risk management and control in place for the application of the Port Facility Security Plan (PFSP) to ensure the safety of all pier users on cruise days at Hawes Pier.

The current service delivery model, introduced at the end of the 2023 season, continues to be well embedded, with the Council Port Facility Security Officers (PFSOs) working effectively together both as a team, and with the security provider management and operatives. The following improvements have been identified to strengthen controls and improve compliance including contract management:

- some aspects of access controls, contingency and evacuation protocols, and records retention processes outlined in the plan should be reviewed to ensure that they are clear, appropriate and understood by all, and further refresher training delivered to support this
- the maritime elements of the security provider tender return should be reviewed to ensure that all supporting plans have been provided, and for the planned service improvements outlined, the PFSO team should work with the security provider to agree a programme for future seasons across the lifetime of the contract
- formal monitoring and review processes should be established to track implementation of actions from Department for Transport (DfT) issues raised
- operational risk management processes should be further refined to align to the Council's risk management framework and ensure effective review of ongoing and new threats identified.

Overall Assessment	Reasonable Assurance
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Areas of effective practice

- **Managing the impact of restrictions on pier users and stakeholders:**
 - lease arrangements are either in place or being drafted to ensure compliance with restrictions by all pier tenants during cruise calls
 - there is regular formal engagement with pier tenants and wider stakeholders to comply with the plan, and ensure good relationships are maintained, and any issues or improvements captured and managed. This is supported by ad hoc meetings and discussions as required.
- **Traffic management:**
 - the PFSO team have designed and rolled out effective arrangements to ensure that traffic is managed on cruise days, with permitted restrictions only applied when needed. For example, the temporary traffic regulation order was only used for three cruises during the 2024 season
 - there is regular formal engagement, communications and information sharing with wider stakeholders and the local community to ensure awareness of traffic management arrangements for each season, with any issues or improvements recorded and managed.
- **Services provided by other Council teams:**
 - the PFSO team formally engage with the operational teams who support pier cruise operations at Council debrief meetings pre and post season, during the season as required, and at pier user group meetings
 - operational processes are well established and documented, and any issues logged and resolved at local level without a need for escalation.
- **Other good practice noted for an area with findings:**
 - a contract staffing resilience risk identified by the PFSO team was quickly raised and resolved by the PFSO with security provider management prior to the next scheduled contract review meeting.

Audit Assessment

[See Appendix 1 for Control Assessment and Assurance Definitions](#)

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. Port Facility Security Plan Compliance			Finding 1 - Security Plan compliance and completeness	Medium Priority
			Finding 2 - Contract management arrangements	Medium Priority
			Finding 3 - Management of Department for Transport actions	Medium Priority
2. Managing the Impact of the TRA on Key Stakeholders			No Issues noted	N/A
3. Risk Management			Finding 4 - Risk management	Medium Priority
4. Information Governance			See Finding 1	As per Finding 1
5. Service Level Agreements and Service Standards			No issues noted	N/A

Background and scope

The City of Edinburgh Council (the Council) owns, manages and maintains the Hawes Pier (the Pier) port facility in South Queensferry. Security at port facilities in the UK is governed by legislation and guidance including the [Ship and Port Facility Security Regulations \(2004\)](#) and is subject to oversight by the [Maritime Security & Resilience Division](#) of the UK government Department for Transport (DfT).

As owner of the Pier, the Council is responsible for ensuring an appropriate Port Facility Security Plan (PFSP) is in place, and that security arrangements are consistently and effectively applied in line with DfT requirements. The PFSP covers all aspects of security, is prepared and maintained by the Council using a standard DfT template, and subject to annual review and approval by the DfT. During a ship visit, third party users of the Pier must comply with the security procedures outlined in the PFSP. The DfT has the authority to undertake planned or unannounced visits/ inspections as they consider appropriate, and the DfT require an annual independent audit of the PFSP (completed by the Council's Internal Audit team). Every five years, DfT also undertake a port facility security assessment (PFSA), which is a risk analysis of all aspects of a port facility's operation. This was undertaken at the Pier in March 2025 and positive feedback was provided to the PFSO following this visit, with only 2 of 31 assessed aspects requiring rectification.

Cruise ship visits

The presence of a cruise ship in the Firth of Forth may present an increased risk of a security incident. Consequently, the Pier is designated by the DfT as a Temporary Restricted Area (TRA) during such visits. The cruise ship season is principally from May to October, with 26 visits scheduled in 2025. The PFSP outlines the range of security measures and requirements which the DfT expect to apply at the Pier when cruise ships visit.

Working Arrangements

One of the key PFSP requirements is a designated Port Facility Security Officer (PFSO); a Council employee who has responsibility for managing and overseeing security arrangements at the Pier on the days when cruise ships

are visiting. The Council's Transport Manager is the named PFSO in the plan and is supported in this role by a further 8 trained Council PFSOs; a team of four officers who provide coverage at all times during cruise visits, and a further four managers available to deal with any issues requiring escalation in the absence of the named PFSO.

Aspects of port security are outsourced to a third-party supplier, as part of the Council's wider security contract arrangements. A new Council security provider started in February 2025. A number of security operatives and managers employed by the previous security provider at the port facility are now employed by the new provider. This includes the named Deputy PFSO in the plan, who is on site during visits to supervise the security team and provide support to the team of Council PFSOs.

Scope

The objective of this annual review was to assess the continued adequacy of design and operating effectiveness of the key controls to ensure the PFSP content remains compliant with DfT requirements; and confirming that the security controls detailed in the plan are consistently and effectively applied.

Alignment to Risk and Business Plan Outcomes

The review also considered assurance in relation to the following Corporate Leadership Team (CLT) risk categories:

- Governance and Decision Making
- Health & Safety (including public safety)
- Regulatory & Legislative Compliance
- Resilience
- Supplier, Contractor & Partnership Management

Business Plan Outcomes:

Edinburgh has a stronger, greener, fairer economy and remains a world leading cultural capital.

Limitations of Scope

The following areas were excluded from the scope of our review:

- The audit only included a review of outcomes of DfT inspections and compliance reviews from October 2024 up to the date of the internal audit site visit on 1 July 2025.

Reporting Date

Testing was undertaken between 4 June and 4 August 2025.

Audit work concluded on 5 August 2025, and the findings and opinion are based on the conclusion of work as at that date.

Findings and Management Action Plan

Finding 1 – Security Plan compliance and completeness

Compliance Issues

A team of five security operatives are responsible for security of the temporary restricted area (TRA) during cruise visits and perform their duties in compliance with the PFSP. Feedback provided by two operatives during the audit site visit established that they were largely clear as to their roles and responsibilities when working at the pier, however some aspects of the plan are unclear:

- although the location of the emergency assembly point is covered in security team briefing sessions, and included in a diagram in the training folder held at the security desk, one security operative did not know where this was
- discussions with both security operatives and PFSOs highlighted a lack of clarity as to whether Maid of Forth and Forth Belle employees require to be issued with temporary passes when entering the pier from land. The relevant sections of the plan are also unclear, noting that valid photographic ID must be shown but not confirming if this can be used in lieu of a temporary pass, as detailed for other pier users (INEOS/Targe)
- further guidance on the requirements of the plan covering actions to be taken by security operatives when undertaking a bomb search, or when a bomb is found was issued following the 2024 internal audit. However, the step-by-step processes to be followed were still not clearly understood by operatives interviewed during the audit site visit, and the starting point of a search was also not clear to the Security Supervisor.

Completeness of Plan

The 2024 internal audit raised an issue in relation to the application process for the PFSO to obtain counter terrorism check (CTC) clearance which has not been completed therefore no expiry date for this certification is included in the plan. This was also raised by DfT as an improvement point in their

Finding Rating	Medium Priority
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March 2025 assessment, and the PFSO has been provided with guidance and direction to restart the process, which was timed out last year.

This does not impact the validity of the plan, which was approved by DfT on the basis of the named Deputy PFSO's certification. However, as no Council employee currently holds valid CTC clearance, there is a reliance on certifications held by a third party to operate the plan, and the Deputy PFSO's clearance expires prior to the 2026 season.

Records Management Retention Trigger Points

While there is evidence that information governance processes had been designed to ensure records are securely held in appropriate formats for an appropriate period of time, one section of the plan had not been updated to reflect current practice and to align to other sections of the plan which outlined the applicable storage periods.

Risks

- **Health and Safety** - failure to identify and mitigate key health and safety risks to pier users, Council officers, third party agents and the general public
- **Regulatory and Legislative Compliance**
 - uncertainty on plan incident requirements and routine checking arrangements may result in non-compliant operations
 - retention periods applied to operational documents do not align to the disposal periods outlined in the plan

Recommendations and Management Action Plan: Security Plan compliance and completeness

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
1.1	Entry processes for Maid of the Forth and Forth Belle employees outlined in section 3 of the plan should be reviewed and updated for 2026.	Entry processes for Maid of the Forth and Forth Belle employees will be reviewed and updated for 2026 Season.	Interim Corporate Director of Place	Transport Manager – Citywide Roads Coordination (Lead PFSO)	31/03/2026
1.2	Procedures for conducting a bomb search outlined in section 11 of the plan should be reviewed and updated for 2026 where appropriate.	Procedures for conducting a bomb search will be reviewed and updated for 2026.			31/03/2026
1.3	Section 9 of the plan covering record keeping should be updated for 2026 to reflect the retention period set out in sections 2 and 10.	The plan will be updated for the 2026 Season to reflect the appropriate retention period.			31/03/2026
1.4	Refresher training should be delivered periodically to all staff working at the port during the season, and a session held specifically to re-iterate the location of the emergency assembly point, pier tenant access processes, and bomb search protocols.	Daily operational requirements for the Pier are covered in the Daily briefing with Security Provider. Additional refresher training will also be conducted on a regular basis. A session will cover assembly point, pier tenant access process and bomb searches.			31/10/2025
1.5	The PFSO should progress their application for CTC clearance in advance of the 2026 season and advise DfT if there are any further obstacles to completion of this.	The PFSO application for CTC clearance is currently in progress for 2026 season and any obstacles that arise will be notified to the DfT.			31/03/2026
1.6	The PFSO should obtain confirmation from the security provider that they have a minimum of three offsite CTC cleared Supervisor level staff for contingency (as outlined in their tender return).	The PFSO has asked the Security Provider to confirm that they have adequate cover for staff and confirmation will be obtained and kept of record.			31/03/2026

Finding 2 – Contract management arrangements

Finding Rating	Medium Priority
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The security provider tender return for maritime elements of the security contract notes that on notification of a level 3 security alert, a pre agreed business continuity plan (BCP) will be immediately implemented. A copy of the plan outlining these arrangements is not held by the Council Contract Manager or PFSO. However, the provider has evidenced it has sufficient additional trained staff to work at the pier if required, who they guarantee to supply at short notice.

The tender return identifies a number of proposed service improvements to be progressed during the lifetime of the contract. There has been no formal review of these proposals in the first year of the contract. For example:

- the tender notes that the Security Supervisor and Contract Manager will carry out regular walk-through exercises to test various scenarios and escalation procedures to ensure officer competency is in the right place

The PFSO confirmed that while this is not formally reported to the team, this has been discussed with the Security Provider Manager at a debrief meeting

- The tender notes the security provider's intention to work with the Council to create a bespoke customer service training plan for the team to undertake, to cover topics such as customer journey, working across

different cultures, British Sign Language, conflict resolution and effective communication. No discussions have been held with the security provider on this to date. The PFSO advised that any customer service concerns are raised with security provider management, and that a need for a customer service specific training plan has not been identified for the current team, who are personable and friendly, with a good understanding of behaviours.

A review of contract section 'key activities annex D' identified that it reflects out of date processes relating to identification checking. The operational process was revised for the 2024 season, i.e., there is no requirement to retain I.D. for the duration of a visit following the issue of a temporary pass. The PFSO confirmed that processes followed on site are in line with the current PFSP.

Risks

- **Supplier, Contractor and Partnership Management**

- lack of clarity over the detail contained in the contractors business continuity plan should enhanced security measures be required
- lack of formal review of intended service improvements for some aspects of the maritime elements of the contract

Recommendations and Management Action Plan: Contract management arrangements

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
2.1	A copy of the Security Provider Business Continuity Plan covering level 3 security alerts should be requested and held for reference in the PFSO Teams channel to evidence levels and timescales applicable should enhanced staffing be required at short notice.	Timescales are already defined in the contract. The Security Provider's Business Continuity Plan has been requested. This will be obtained and kept on record.	Interim Corporate Director of Place	Transport Manager – Citywide Roads Coordination (Lead PFSO)	30/11/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
2.2	The PFSO team should work with the security provider to agree a programme of service improvements in line with their tender proposals, in advance of the 2026 cruise season.	<p>The discussions are underway with the Security Provider. A daily briefing memo that covers security and customer responsibilities has been developed that is updated as issues arise.</p> <p>The service improvements identified under the main Security Contract will be reviewed for those applicable to PFSP service delivery. Any relevant service improvements will be implemented.</p>			31/03/2026
2.3	<p>Council officers should seek advice from the Council's commercial legal team to determine whether a contract amendment is required for annex D to ensure that it reflects updates outlined in the current PFSP.</p> <p>Once amended, a copy of the updated version of annex D should be issued to the security provider to ensure that all contract documents held reflect current required processes.</p>	<p>Council Officers will seek advice from the Commercial Legal team regarding contract variation/ compliance.</p> <p>Following discussion an appropriate approach will be taken regarding Annex D.</p>			31/03/2026

Finding 3 – Management of Department for Transport actions

Finding Rating	Medium Priority
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Two Department for Transport (DfT) reports had been issued since the last internal audit in September 2024, covering an unplanned inspection in October 2024 and the five-year assessment (PFSAs) visit in March 2025. A major non-conformity (MNC) was raised in October covering non-compliance with access controls, and 2 non-conformities (NCs) and 1 finding where improvement was noted as desirable (ICI) raised from the March assessment, covering completion of minimum numbers of drills and exercises, and lack of PFSO CTC certification respectively.

On issue of a report, the PFSO is required to respond by email to a named DfT Officer by a set date, acknowledging receipt and informing DfT of how and when they intend to rectify any aspects scored as either NC or MNC:

- no formal acknowledgement was sent to DfT following the March 2025 assessment to confirm receipt, or to outline in writing how and when the aspects were to be rectified, as a record of verbal discussions held
- formal action plans are not developed to monitor implementation of DfT issues raised, and there is also no DfT requirement for such plans to be put in place, or for the service to report back on completion of actions.

Evidence was provided during the audit that appropriate actions had been taken or are being progressed for all of the issues raised, that some feedback on these had been provided to DfT, and that one of the issues was being tracked via the team risk register.

However, a lack of formal action plans and associated target dates could lead to actions not being implemented within appropriate timescales, and / or cause issues to be repeated or continue for longer than necessary. For example:

- The ICI raised in March 2025 was an audit issue in 2024 (see finding 1)
- The NCs for security drills and exercises was also highlighted in the 2024 internal audit. It is however recognised that improvements have been made during the 2025 season to ensure full compliance through regular review and planning, and completion of a multi-agency exercise in July 2025. This tested two high risk topical scenarios and resulted in enhanced networking arrangements being set up and emerging Council risks being identified.

Risks

- **Regulatory and Legislative Compliance** - lack of formal consistent processes to ensure that proposed actions to rectify all non-conformances raised by assurance providers are recorded, monitored and implemented within pre-agreed timescales.
- **Resilience** - if minimum required drills and exercises are not undertaken, there is a missed opportunity to reinforce plan processes and identify any further learning needs.

Recommendations and Management Action Plan: Management of Department for Transport actions

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.1	<p>On receipt of all DfT inspection reports, the PFSO should:</p> <ul style="list-style-type: none"> • formally acknowledge receipt of the report, and detail how and when any aspects not in conformity will be rectified 	<p>On receipt of all DfT inspection reports, the Council will formally acknowledge receipt, prepare a formal action plan that will be reviewed at team meetings,</p>	Interim Corporate Director of Place	Transport Manager – Citywide Roads Coordination (Lead PFSO)	30/11/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
	<ul style="list-style-type: none"> • prepare an action plan, setting out the proposed management actions and target dates for implementation • regularly review the action plan at team meetings • escalate relevant issues from the action plan to the pier risk register where appropriate. 	and escalate relevant risks/issues to the pier risk register.			
3.2	The PFSO should ensure that any risks identified following drills and exercises undertaken are added to the pier risk register to ensure that they are effectively managed.	Following drills and exercises, relevant risks/issues identified will be escalated to the pier risk register.			30/11/2025

Finding 4 – Risk management

Finding Rating	Medium Priority
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During the 2024 internal audit, the PFSO advised that the team had engaged with the Corporate Risk team, and that the current pier risk register was to be moved to the Council template to align to the Council's risk management framework.

This planned improvement is still outstanding for the current risk register, which outlines key risks, RAG ratings, current and intended actions and owners, but does not record existing controls, an assessment of risk likelihood and impact, or timescales for implementation of actions in order to more effectively manage the risks outlined.

Risks

- Governance and Decision Making** – a lack of alignment between the operational risk register and the corporate risk management framework could lead to inconsistent risk assessment, ineffective risk mitigation, and a failure to achieve overall business objectives

Recommendations and Management Action Plan: Risk management

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.1	In line with the Council's risk management framework, the current pier risk register should be transferred to the Council template.	The Council's risk register template will be adopted.	Interim Corporate Director of Place	Transport Manager – Citywide Roads Coordination (Lead PFSO)	30/11/2025
4.2	<p>In further developing the register using the Council's corporate template, the service should ensure that risks identified remain within the Council's risk appetite for each category of risk.</p> <p>Issues raised in this report should also be reviewed to establish if they should be reflected in the register until actioned.</p> <p>The service should seek further support and advice from the Corporate Risk team (CRT) in developing the revised register and arrange a risk workshop with the CRT where needed.</p>	The Council's risk register template will be adopted, risk appetite approach will be adopted, and the service will seek support from Corporate Risk team (CRT) if required.			30/11/2025

Appendix 1 – Control Assessment and Assurance Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Overall Assurance Ratings	
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings	
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.

Appendix 2 – Areas of Audit Focus and Control Objectives

Audit Areas	Control Objectives
Port Facility Security Plan Compliance	<ul style="list-style-type: none">• An up-to-date plan is in place which has been reviewed and approved in line with DfT templates and requirements• Robust contract management arrangements have been established for the new security provider onboarded in February 2025• Operational arrangements continue to ensure compliance with the plan, including ensuring that third-party security staff are aware of their roles and responsibilities and are provided with adequate training to ensure compliance with their duties in accordance with the PFSP, and that cyber and information security practices and procedures in place also comply with the plan• Recommendations arising from DfT compliance reviews are actioned, with any outstanding issues escalated and recorded in the service risk register.
Managing the Impact of the TRA on Key Stakeholders	<ul style="list-style-type: none">• Measures are in place to manage the impact of restrictions placed on other pier users on cruise days• The PFSO team engage effectively with the local community and transport operators to manage periods of heavy traffic and the impact of transport restrictions in place on cruise days in nearby streets and parking and drop-off areas.
Risk Management	<ul style="list-style-type: none">• Risks related to the Port Facility are identified, recorded and managed within a service risk register, and regularly reviewed to ensure appropriate mitigating actions are in place and remain effective, with escalation to divisional and directorate level risk committees where required. This includes consideration of fraud and serious organised crime related risks.
Information Governance	<ul style="list-style-type: none">• Information governance risks for the Port Facility are clearly understood, and effective controls have been established to ensure adherence to relevant Council policies and procedures.
Service Level Agreements and Service Standards	<ul style="list-style-type: none">• Where services are provided by another Council area, team or third party to support the Port Facility, there is a service level agreement in place which sets out the types of services provided, relevant service requirements, timescales and performance requirements.