

# Compliance plan for Hastings District Council DUML 2022

Deriving Submission Information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-May-21</p> <p>To: 31-Jul-22</p>	<p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</p> <p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 24,900 kWh per annum.</p> <p>Incorrect ballasts applied resulting in an estimated very minor under submission of 22.2 kWh per annum.</p> <p>The current monthly report is provided as a snapshot and is non-compliant. The report contains a lamp install date, but this is not used to re-calculate historic submissions.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as moderate as processes in place to update the database are generally robust.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis will discuss and see what options are available to improve accuracy around the on off times.</p> <p>Genesis will work with HDC to improve database accuracy.</p> <p>Genesis will review dataset and report exceptions back to HDC where exceptions are identified.</p>		01/01/2023
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis will work with HDC and report exceptions from monthly database. Genesis relies on HDC to accurately maintain its database.</p>		01/01/2023
Investigating		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-May-21 To: 31-Jul-22	Seven additional lights identified in the field count. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as processes in place to update the database are generally robust. The impact is assessed to be low based on small number of additional lights found in the field.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed auditor's findings with HDC with an intent that HDC makes every effort the exceptions are rectified.	01/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis relies on HDC to accurately maintain its database.	01/10/2022	

Database Accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-May-21</p> <p>To: 31-Jul-22</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 24,900 kWh per annum.</p> <p>Incorrect ballasts applied resulting in an estimated very minor over submission of 22.2 kWh per annum.</p> <p>The current monthly report is provided as a snapshot and is non-compliant. The report contains a lamp install date, but this is not used to re-calculate historic submissions.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as moderate as processes in place to update the database are generally robust.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will work with HDC to improve database accuracy.</p> <p>Genesis will review dataset and report exceptions back to HDC where exceptions are identified.</p> <p>Genesis has reviewed the auditor's findings and will advise HDC of requirement of visibility of tracking of change within their data base and recommend that install date/removal date/reason for change be included in their data extract.</p>	01/01/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will work with HDC and report exceptions from monthly database. Genesis relies on HDC to accurately maintain its database.</p>	01/01/2023	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-May-21</p> <p>To: 31-Jul-22</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 24,900 kWh per annum.</p> <p>Incorrect ballasts applied resulting in an estimated very minor over submission of 22.2 kWh per annum.</p> <p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</p> <p>The current monthly report is provided as a snapshot and is non-compliant. The report contains a lamp install date, but this is not used to re-calculate historic submissions.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as moderate as processes in place to update the database are generally robust.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will work with HDC to improve database accuracy.</p> <p>Genesis will review dataset and report exceptions back to HDC where exceptions are identified.</p> <p>Genesis has reviewed the auditor's findings and will advise HDC of requirement of visibility of tracking of change within their data base and recommend that install date/removal date/resson for change be included in their data extract.</p>	01/01/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will work with HDC and report exceptions from monthly database. Genesis relies on HDC to accurately maintain its database.</p>	01/01/2023	