Roinn Coimirce Sóisialaí

Department of Social Protection

Internal Audit Report (Final)

For Departmental circulation only

The Internal Audit Activity of the Department of Social Protection conforms to the standards of the Dept. of Public Expenditure & Reform Audit Standards 2012 and to the Standards & Ethics of the Institute of Internal Auditors.

Subject: JobBridge

Report No. 06/2015 Date completed: 18/02/2016

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1. EXECUTIVE SUMMARY

The main high concern issues found during the audit were:

- Host Organisations make a declaration that they comply with the terms and conditions of the JobBridge scheme when registering a JobBridge internship. No checks are carried out by either the NCC or at monitoring visits to verify this.
- The JobBridge policy unit stated that CSS which is a Fás/Solas system is not back-up since June 2014 when Solas de-commissioned the back-up server and moved their own data to the cloud but did not move DSP data. There is a risk of data loss until all CSS data has been transferred to the new Activation Case Management (ACM) system.

The medium rated concerns refer to

- The Service Level Agreement between DSP and Solas expired in December 2014. This is creating administrative difficulties for DSP staff.
- Aspects of the JobBridge monitoring reports, database and procedures.

Classification of Concerns:
High: (H) Important matter that has a financial or a reputational risk for the Department
Medium: (M) Significant matter requiring attention at an appropriate level
Low: (L) Routine matter of a housekeeping nature.

Total issues	High	Medium	Low	None
5	2	3	0	0

2. INTRODUCTION

2.1 Audit Scope

The broad objectives of the audit were:

- To evaluate the adequacy and effectiveness of controls and procedures in the operation of the JobBridge Scheme.

- To make appropriate recommendations where necessary.

The audit team examined a random sample of host organisations and internships for the following:

- To ensure that interns on the JobBridge scheme satisfy the qualifying conditions in terms of having been at least 78 days in receipt of the required Social Welfare payment.

- To ensure that the eligibility form UP51C has been completed for each intern.

- To ensure that the €50 Internship allowance is only paid for the period of the Internship Scheme.

- To ensure that those on JobBridge internships can be correctly identified on the DSP computer systems for statistics.

- To ensure that the required monitoring has been correctly carried out by Officers in the Divisions.

- To examine Disaster Recovery Plans for DSP data on the Solas system.

- To make appropriate recommendations where necessary

2.2 Staffing Structure

There are two main areas responsible for the JobBridge Programme:

1. The JobBridge policy unit based in Goldsmith House.

Their main responsibilities are:

- Programme Management – decisions around programme rules, eligibility, issues including responsibility for addressing general queries, complaints etc.
- Addressing public queries, whistleblowing etc.
- Addressing compliance queries from Host Organisations and Interns
- Answering written and oral PQs, Dáil motions, Leaders Questions, political reps
- Providing JobBridge Reports/Data – Weekly Report, Ad hoc reports.
- Responsibility for Policy/Programme Development/Website changes.
- Responsibility for Programme Evaluation and Monitoring
- Preparation of Materials for Media Queries
- On-going support to division, NCC, Interns, Host Organisation, internal and external stakeholders.
- Management and co-ordination of JobBridge PR/Promotional Events
- Liaise with local and regional DSP offices regarding payment issues, operation of programme and changes to programme.
- Liaise with local and regional DSP offices re queries from companies and Interns e.g. with non or late payment of the €50 top up.
- Freedom of Information queries in respect of JobBridge Policy
- Any other legal issues that may arise

2. The National Contact Centre (NCC) based in Edenderry

Their main responsibilities are:

- The validation of Host Organisations who register their organisation via the JobBridge website and the issue of usernames and passwords to them prior to the Internship going live on the Jobs Ireland website.
- Where an Internship is rejected: liaising with the Host Organisation to advise them and to give the reason why e.g. insufficient information given in the advert, cooling off period applied or a company who have already reached the quota of Interns they are allowed and informing the Host Organisation on the necessary steps to take in order to have their application processed.
- Completed UP51C intern eligibility forms are processed by the NCC and marked as "DSP verified" on Client Service System (CSS) – this process ensures that eligibility has been confirmed and that payment of the €50 top up is approved. This generates an automatic email sent to the Host Organisation explaining the individual is eligible and can commence the next available Monday. The system only allows for an Intern to start on Monday and finish on Friday. The payment of the €50 top up will only issue once the Host Organisation has entered the "actual" start date
- Producing statistics
- The NCC has other responsibilities in addition to the JobBridge Programme.

2.3 Scheme Background

JobBridge was announced as part of the Government's Jobs Initiative in May 2011 and was officially launched on 29th June 2011. It aims to provide those seeking employment with the opportunity to gain work experience, maintain close links with the labour market and enhance their skills and competencies through an internship opportunity, thereby improving their prospects of securing employment in the future.

JobBridge provides work experience placements for interns for a 6 month or 9 month period subject to a maximum of 3 JobBridge Internships or a cumulative total of 18 months. Its aim is to assist in breaking the cycle where jobseekers are unable to get a job without experience, either as new entrants to the labour market after education or training or as unemployed workers wishing to learn new skills.

A Standard Agreement is completed and signed by both the Host Organisation and the intern. It includes details of the skills and/or experience the Intern will have the opportunity to learn and/or apply during the Internship. The Host Organisation must also nominate an individual to support and/or mentor the Intern during the placement and complete on-line monthly compliance returns.

Interns receive an allowance of €50 per week on top of their social welfare entitlement for the duration of the internship. Employers do not make any payments to the interns.

The European Commission is providing co-funding to JobBridge for participants under 25 years of age. JobBridge is jointly backed by the Youth Employment Initiative (YEI) and the European Social Fund (ESF) and Department of Social Protection on an equal funding basis. For the period 2015 - 2017 the allocation from each of the ESF and YEI is €11.2 m approx.

Number of Internships placements

The total number of Internship places an organisation can offer at any one time is:

Number of Full Time Employees *	**Number of Internships**
1-10 employees	1 internship place
11-20 employees	3 internship places
21-30 employees	4 internship places
30 + employees	20% of the workforce to a maximum of 200 internships whichever is the smaller
** Who is employed for 30 hours or more per week (i.e. on payroll and subject to PAYE and PRSI). Sole traders with no employees are not eligible for the scheme.*	

The Host Organisation may not provide an Internship opportunity under the Scheme to an individual with whom they have, or had an existing or previous employment relationship. A Host Organisation cannot offer an Internship in the same area of activity that they have made an employee redundant.

Internal Internship validation/quality check guidelines issued 23/8/12 state that the words Intern, Internship, Company Name or Trainee/Graduate must not appear in the internship title advertised by the Host Organisation. The NCC liaises with and advises Host Organisations on this matter when validating the internship.

Specific guidelines issued in October 2014 in relation to internships in schools. Only specific posts are allowed as internships.

Job Title: The following is the list of actual posts which exist within Primary and Secondary schools:-

Primary School	**Secondary School**
Teacher	Teacher
Special Needs Assistant (SNA)	Special Needs Assistant (SNA)
Secretary	Secretary
Caretaker	Caretaker
Principal	Principal
Librarian	Librarian
Cleaner	Cleaner
	Lab Assistant
	IT Technician

Department of Education and Skills (DES) states that most schools will only have these posts in existence, however in some rare occasions will have other posts – in these instances the school will have to show to DSP JobBridge Policy unit that the post exists and is currently occupied by staff.

Only Education sector Job Titles listed for both Primary and Secondary schools will be accepted and validated.

Summary of Activity Levels on JobBridge Scheme since 2011	
Measure	**Number**
No. of individual Host Organisations	16,929
No. of Internships Commenced*	38,665
No. of current Internships as at 02/04/2015	5,989
No. of Internships Finished in full	16,247
No. of Internships Finished early	16,429
No. of Interns offered employment by Host Organisation incl. PRSI scheme	7,084

* Up to 02/04/2015

3. FINDINGS AND RECOMMEDATIONS

3.1 Host Organisation eligibility	**Concern: High**

In order for a host organisation to be eligible to participate in the JobBridge Programme they:

- must have a minimum of 1 full time employee who is employed for 30 hours or more per week (i.e. on payroll and subject to PAYE and PRSI)
- Be a legal entity and/or a charity recognised by the Revenue Commissioners (with a CHY number)
- Have NO vacancies in the area of activity in which the Internship is offered.
- The placement is not displacing an employee.

- Have public/employers liability insurance and motor insurance, if applicable, that will cover any Interns on the JobBridge Scheme
- Be fully compliant with current workplace Health and Safety and all other legal and sectoral requirements.

Currently placements in the apprenticeship/trade area (e.g. electrical, plumbing) are not allowed for JobBridge, the National Internship Scheme. With care related Internships e.g. childcare, care for the elderly etc. Host Organisations wishing to offer care related Internships cannot use Interns to displace the need for employees in cases where the Host Organisation is required by law (in the case of childcare) or by contractual commitments, to provide a certain ratio of staff to clients.

Sole Traders or Limited Companies who do not have a minimum of 1 full-time employee who is employed for 30 hours or more per week (i.e. on payroll and subject to PAYE and PRSI), may not participate in JobBridge.

Observations		**Risks**
1	Host organisations must first register in order to advertise either a job vacancy or an internship on the Jobs Ireland website. Registration can be done directly through the Jobs Ireland website or via the Welfare website. The system (which was inherited from Fás) does not recognise duplicate employers so host organisations can register multiple times. Staff at the NCC stated that they manually check for duplicates to ensure that host organisations do not exceed the total allowable internships. The manual checks were observed on the audit site visit. However an examination of the CSS Database which contains all registered host companies identified 1,116 individual Companies but the contact details were used more than once. The following are some of the examples identified (full details can be found at Appendix 1): ➢ 18 individual companies used the same	Breach of JobBridge guidelines and error

	contact details (Limerick LES) ➢ 11 companies (2 registered four times, 1 registered twice and 1 registered once) have the same contact details. All companies are in the food/restaurant sectors. ➢ 7 different companies used the same contact details (a recruitment service) ➢ 11 other companies used contact details for what looks like 2 more recruitment services.	
2	Host organisations are only asked to state the number of employees they have and not if they are full-time or part-time. While a company registered number is sought, this is not always supplied and it does not have to be a Revenue employer registered number (ERN). Of 80 cases examined, the number of employees listed when registering compared to the number of employees in the last P35 return on Central Records (CRS) agreed in only 14 cases. No checks are carried out by the NCC on this when validating an employer for JobBridge. The number of employees has a direct link to the number of internships a host organisation may offer.	Breach of JobBridge guidelines and error
3	In 3 cases examined, the only employees of the host organisation on CRS were either the owner and or his/her spouse – both paying self-employed contributions thus rendering the host organisation ineligible.	Breach of JobBridge guidelines and error
4	In 4 cases, registration of the Host Organisation could not be traced on either CRS or the Companies Registration Office (CRO). In another case, a college registered on Jobs Ireland in its own right but comes under an Educational Training Board.	Breach of JobBridge guidelines and error
5	Host organisations must have public/employers liability insurance and motor insurance, if applicable, that will cover any Interns on the JobBridge Scheme. They must also be	Breach of legal and sectoral requirements.

	fully compliant with current workplace Health and Safety and all other legal and sectoral requirements. The host organisation declares that it will comply with these conditions and other conditions of the scheme by ticking a box when registering the JobBridge internship. The host organisation is not asked to supply documentary evidence to prove they fulfill the above criteria nor are any checks carried out by either the NCC or at monitoring visits.	The Minister may be left exposed to insurance claims.
6	Employers make a statement on their application that the intern is not displacing a job vacancy. It is not possible to verify whether or not the internship is displacing a potential job vacancy.	Displacement of jobs
7	No checks are carried out against Redundancy payments issued.	Breach of JobBridge guidelines

Recommendations:

M 1 A procedure should be put in place to check that host organisations fulfil the eligibility criteria rather than depending solely on self-declaration. (1-7)

H 2 Validations should be built in to the new Jobs Ireland website to ensure that Host Organisations can only register once.

Management Response/Action Plan:	**Audit Comment:**
1.Mngt. Response Apendix 3, Page 2-9	**1.**Response accepted.
2.Mngt. Response Page 7	**2.** Response accepted. For Implementation onto the new Jobs Ireland website in Qtr 2 2016

3.2 IT Systems	**Concern: High**

All JobBridge internships are registered by Host organisations on the Jobs Ireland website. Employers can also register job vacancies on it. Once registered, the employer must be validated by the NCC. This is done through specific system access by NCC staff on what is known as the 'Prof System' on Jobs Ireland and it feeds into the CSS system. All of these systems were originally Fás systems and were inherited by DSP when responsibility between departments changed. Solas/Fás still own these systems and maintain them. Staff in DSP must contact staff in Solas (formerly Fás) if they wish to get information from these systems e.g. stats or if they wish to have any amendments made to the system.

	Observations	**Risks**
1	Plans to develop a new Jobs Ireland website are at tender stage with the Final Request For Tender due to come before the evaluation board soon. The new Jobs Ireland website will replace the existing one and the 'Prof' system used by NCC to validate employers/JobBridge internships. Once a contract is awarded, the project is likely to start Aug/ Sept 2015 and likely to be operational towards the end of Q2 2016.	N/A
2	Activation Case Management (ACM) has been developed on Bomi to replace CSS. The transfer of CSS clients to the BOMi ACM system has commenced since the beginning of June 2015.	N/A
3	All JobBridge cases will be administered from the new Jobs Ireland website and ACM when both are fully developed and operational and will replace the old Fás systems.	N/A
4	A Service Level Agreement (SLA) was drawn up between the Department of Social Protection (DSP) and FÁS when DSP took over responsibility for the Fás employment service and community services employment programmes from January	Delays Inefficient practices Risk of inaccurate

	2011. This SLA expired in December 2014 and has not been extended. DSP staff told the audit team that since then, it is difficult to get Solas staff to deal with any system related queries which they have or to get specific stats in order to reply to e.g. Parliamentary Questions. Reliance is placed on ex Fás staff which has since joined DSP personally contacting former colleagues. There is no standard format for reports received from Solas and it's difficult for DSP staff to stand over them.	data
5	All data on the CSS system was held on a back-up server by Solas. However, JobBridge Policy staff stated that in June 2014, this server was de-commissioned by Solas and they now back up their own data in the Cloud. No provision was made for the back-up of DSP data and it is currently not backed up. The audit team have been unable to get confirmation of this from Solas despite numerous communications.	Without System back-up for CSS there is a risk of data loss until the transition from CSS to ACM is complete

Recommendation:

M 1. The SLA should be extended to cover the period until the new IT systems are in place (4)

H 2. The CSS system should be backed up until it is de-commissioned when all data has been transferred to the new BOMi ACM system (5)

Management Response/Action Plan:	***Audit Comment:***
1 & 2: Mngt. Response Page 3 and pages 9 to 11	***1& 2*** *Response accepted*

3.3 Monitoring Visits	Concern: Medium

The Department reserves the right to conduct monitoring visits throughout the duration of an internship. They are carried out by Case Officers/Employer Engagement Officers on a minimum of 5% of internship starts each month.

The purpose of monitoring is to ensure that the Standard Agreement has been fully completed, signed and is being adhered to by both the Host Organisation and the Intern and it must be available on site for inspection. Non-compliance in this matter is seen as a breach of the terms and conditions of the scheme. Monitoring visits are also a mechanism for engaging with local employers and keeping them up to date with supports etc. that the Department has to offer.

Prior to the monitoring visit the Case Officer/Employer Engagement Officer must have:

- Printed out the interns Internship record from CSS
- Checked the Compliance Record is up to-date
- A Copy of Original Internship Placement Advert
- A Copy of Standard Agreement (this is either provided by the Host Organisation in advance or made available for inspection on the site visit).

A standard JobBridge Monitoring Checklist which comprises 8 questions with Yes/No tick-box answers and space for additional information is used for all visits. These address the Standard Agreement, mentoring, duties and responsibilities as outlined in the original internship advertisement, intern working hours and monthly compliance records.

The approach for monitoring JobBridge consists of: Initially meeting and greeting with the Host Organisation.

- **Part A** involves conducting a monitoring check with the Intern
- **Part B** involves conducting a monitoring check the Host Organisation's appointed Mentor.

A Monitoring Report is then completed which indicates either compliance or non-compliance and the reasons for non-compliance where relevant. The results are then

entered on the Monitoring Share Point database, and a copy is sent to both Host Organisation and Intern.

The JobBridge Policy Unit monitors this database and sends reminders to the Divisions if results haven't been updated.

Observations		**Risks**
Monitoring and Evaluation		
1	At least 5% monitoring visits are carried out in all divisions with some divisions carrying out 100% monitoring.	
2	Not all required documentation is held on the monitoring visit files. *	Lack of audit trail
3	While the results of monitoring visits should be updated on Sharepoint immediately, there are no specific guidelines detailing when a result should be updated where further information has been requested by DSP. In some cases the result was updated as non-compliant and when the information was received, a new result of compliant was updated. In other cases, the result wasn't updated until all information was received and in other cases, a non-compliant result was updated immediately and not amended when the information was received.	Incorrect results and work practices not consistent.
4	Officers conducting monitoring visits do not have powers of investigation similar to a Social Welfare Inspector (SWI). Where an issue arises, the case has to be referred to a SWI if an employer is not co-operative.	**Comment:** Consideration should be given to granting powers of investigation to Case Officers/Employer Engagement Officers.
5	With the exception of the Standard Agreement, no other documentation e.g. time sheets, staff records to show employees are employed at least 30 hours per week, Public Liability Insurance etc. is checked during the monitoring site visit	Breach of JobBridge guidelines
6	The Sharepoint database can be accessed by anyone who has been given the correct permissions. This means that someone other	Lack of audit trail

	than the officer that carried out the monitoring visit can update the results. In 19 of the 155 cases examined there was no signed copy of the report on file. 13 had a printout of the Sharepoint result only and 6 had a label with the officers details typed.	

*Breakdown included in Appendix 2.

Recommendations:

L 1. Guidelines in relation to Monitoring Visits should be adhered to**.** (2)

M 2. Guidelines should be drawn up detailing exactly when a result should be updated on the database. (3)

M 3. JobBridge Monitoring Reports should be broadened to cover more comprehensive Host Organisation checks. (5)

M 4. The Sharepoint database should be amended to reflect any decision made for Recommendation 2 and to identify the officer updating the result and the officer who carried out the monitoring visit. (3 & 6)

Management Response/Action Plan:	***Audit Comment:***
2. Mngt. Response Page 12 **3.** Mngt. Response Page 13 **4.** Mngt. Response Page 12 and 14	**2-4** Response accepted

3.4 Claimload Testing	**Concern: Medium**

A database containing details of all internships that have commenced since the JobBridge Scheme was introduced up to 02/04/2015 was received from JobBridge Policy Unit and a series of tests was carried out. The following are the main findings with the full results available at Appendix 1.

A list of Special Needs Assistants (SNA) allocated to primary schools in October 2014 was taken from the National Council for Special Education (NCSE) website and a data match was carried out against it.

Observations		**Risks**
1	587 cases identified with either Graduate, Intern or Trainee in the title of the advertised position	Breach of JobBridge guidelines
2	237 cases where the number of Employees is blank	Potential risk of Host Organisations exceeding their quota of internships
3	A list of actual posts/job titles that exist within Primary and Secondary schools was compiled by Policy Unit in conjunction with the Dept. of Education and Skills. Since 1/10/2014, only job titles that are contained in this list will be accepted and validated for internships for Primary and Secondary schools. A data match was carried out between this list and internships that commenced in	Internship posts being advertised which are in breach of JobBridge guidelines.

	Primary and Secondary schools since 1/10/2014 and 160 internships were identified where the advertised posts do not appear on the list. (Please see Appendix 1 for a comprehensive breakdown)	
4	Number of SNA internships does not match the number of SNA's. Fifteen schools have no SNA posts allocated by the National Council for Special Education in 2014/15 but they have SNA interns.	No qualified person to mentor SNA intern.

Recommendations:

L 1. JobBridge guidelines should be adhered to. (1)

M 2. Recommendation as at 3.1 (2, 3 & 4)

3.5 Case Examination	**Concern: Medium**

The case examination consisted of the detailed examination of 2 elements as follows:

1. 80 UP51C intern eligibility forms received in NCC from 01/01/2014.
2. 155 Monitoring Reports covering 4 separate divisions: Dublin Central (45 cases), Dublin North (45 cases), North East (35 cases) and South East (30 cases).

Observations		Risks
UP51c intern eligibility forms		
1	All interns had been in receipt of a qualifying payment for the correct period prior to commencing the internship.	
2	In 2 cases the interns have a previous employment relationship with the Host Organisation per CRS.	Ineligible for the internship
3	All interns had been awarded the €50 top-up payment. However, the "To Date" does not match the internship end date in 4 cases.	Overpayment/Underpayment of the €50 top-up payment.
4	In 45 cases the number of employees stated by the Host Organisation does not match the latest P35 return and in 21 cases, the number of employees could not be established as there was no figure stated on the UP51c or there was no P35 return made	Number of internships may breach JobBridge guidelines.
Monitoring Reports		
1	In 18 cases, the monitoring checklist had not been completed in full by either the mentor or the intern.	Inadequate monitoring
2	5 cases identified where the mentor named on the checklist or in the Standard Agreement was not the person interviewed without an acceptable reason e.g. mentor had changed due to maternity leave	Breach of JobBridge guidelines.

Recommendation:

UP51c intern eligibility forms

M 1. Recommendation as at 3.1 (2 & 4)
M 2. Reminders should issue to Intreo/LO staff to ensure "To Date" is updated correctly (3)

Monitoring Reports

M 1. A reminder should be sent from Policy Unit to the Divisional staff to adhere to the Guidelines in relation to Monitoring Visits. (1 & 2)

Management Response/Action Plan:	***Audit Comment:***
UP51c intern eligibility forms 1:Mngt response Page 17 and 18 and also answered at pages 2-9 2: Mngt response Page 18 **Monitoring Reports** 1: Mngt. Response page 19	**UP51c intern eligibility forms** 1: Response accepted *2: Response accepted* **Monitoring Reports** 1: Response accepted

Appendix 1:

(i) Claimload Examination:

The record of all internships that have commenced since JobBridge was introduced up to 2nd April 2015 was examined and a series of tests were run using IDEA software. The following are the findings:

1. Breakdown of Internships:

Status	No. of Cases
Total number of Internships:	38,665
Currently on Programme	5,989
Finished - Early	16,429
Finished - Full	16,247
Total:	**38,665**

2. Status of interns where programme was finished early:

Reason	No. of Cases
Got job with Host Organisation	2,732
Got job with Host Organisation – PRSI Scheme	405
Got job elsewhere	4,210
Returned to job search	834
Other – Various	8,248
Total:	**16,429**

3. Status of interns where programme was completed in full:

Reason	No. of Cases

Got job with Host Organisation	3,030
Got job with Host Organisation – PRSI Scheme	917
Got job elsewhere	343
Returned to job search	4,656
Other – Various	7,301
Total:	**16,247**

4. Breakdown of incomplete details for Host Organisations:

Description	No. of Host Organisations
Company Sector = Blank	1,474
Company Type = Blank	295
No. of Employees = less than 1	249
Company Contact Email details are the same as Interns Email details	225
Company Contact Details = Blank	627

5. Breakdown by Company Sector:

Company Sector	No. of HO's in each Sector
Blank – No Company Sector identified	1,474
Chemicals Manufacturing	165
Cleaning	134
Clothing & Footwear Manufacturing	51
Construction	938
Engineering	931
Financial Services	1,176
Food/Drink/Tobacco Manufacturing	695
Information Technology	2,114
Other Services	26,445
Printing & Paper	409
Retail/Wholesale/Hotel/Cater	3,266
Security	153
Textiles Manufacturing	57

Transport/Communications	657
Total:	**38,665**

6. Breakdown by Company Type:

Company Type	No. of HO's in each Type
Blank – No Company Type identified	295
Civil Service	339
Commercial Semi State	245
Community	1,926
Education Private Sector	385
Education Sector	2,861
HSE	378
Local Authority	750
Non-Commercial Semi State	427
Private Body	26,534
Public Body	2,709
Voluntary	1,816
Total:	**38,665**

7. Summarization of Interns by Age Band:

Age Band	No. of Interns
15-19	966
20 – 24	9,760
25 - 34	16,523
35 - 44	6,832
45 - 54	3,540
55+	1,044
Total:	**38,665**

8. Number of internship advertisements with Graduate Intern/Internship or Trainee in title:

Description	No. of cases
Graduate	43
Intern	109
Trainee	435
Total:	**587**

9. Current internships in schools where the job title does not correspond with the list as decided by Policy Unit and DES.

Position As Advertised	No. of Internships
Accounts Clerk/Admin Support/Cúntóir	5
Admin/Clerk/Secretarial/Office	41
Art Technician/Graphic Designer/Web Design	4
Assistant Caretaker/Gardener/Horticulturist/Groundskeeper/General Maintenance	14
Business Development Asst./Environmental Support/Event & Fundraising Co-Ordinator/Public Relations/Quality Assurance	5
Library Asst./Library Supervisor	14
Child Support Worker/Childcare Asst./Classroom Asst./Teaching Asst.	44
ICT/Computer Technicians/ICT Support Asst.	13
General Personal Asst./Principal Asst./Early Years Asst.	6
Lab Technician/Science and IT Lab Technician	4
Learning & Resource Co-Ordinator/Literacy Co-Ordinator/Literacy Lift Off Assistant	4
Science/Biology Technician	3
Sports Facilitator/PE Assistant	3
Total:	**160**

10. Cases identified where the same Company contact details were used for Multiple Host Orgainsations.

No. of Host Orgainsations (HO)identified	Total no. Of Host Organisations	No. if individual HO's linked to each	Comments

where the contact email details were used for more than 1 HO	**involved**	**contact email**	
1	18	18	Email address is for Limerick Local Employment Service (LES)
1	11	11	2 of the HO's are registered 4 times each and 1 is registered twice, each with slightly different spellings. All companies are in the food/restaurant sectors.
2	14	7	One of the email addresses is for indeed.com which is an online recruitment service
1	6	6	Email address belongs to what looks like a recruitment service
3	15	5	One of the email addresses belongs to what looks like a recruitment service

12	48	4	
42	126	3	
439	878	2	
	1,116		

(ii) Monitoring Reports:

The following are the results of tests carried out on the Monitoring Reports database from Sharepoint. Monitoring results have only been updated on Sharepoint since May 2014. There are a small number recorded where the dates are prior to May 2014 due to delays in updating.

1. Breakdown of Monitoring Visits and results:

Details	No. of Cases
No. of monitoring reports updated	3,936
No. with a result of Compliant	3,850
No. with a result of Non-Compliant	86
Total:	**3,936**

2. Summarization of Non-Compliant reasons:

Reason	No. of Cases
Blank – No reason identified	13
Changes made to Standard Agreement	4
SA not completed and/or not available for inspection	48
Developmental Work Experience Agreement not completed or being followed	6
Duties and Responsibilities not in line with Internship Placement Advertisement	2
Inadequate Mentoring and Support	4

Interns hours of work not in line with Standard Agreement	5
Monthly Compliance not completed	2
No Mentor assigned	2
Total:	**86**

Some cases have more than 1 reason documented.

3. Summarization of Monitoring Reports by Division:

Division	No. of Records
Cork Central	242
Dublin Central	506
Dublin North	409
Dublin South	252
Mid Leinster	233
Mid West	270
Midlands North	236
Midlands South	265
North East	180
North West	227
South East	404
South West	220
West	492
Total:	**3,936**

4. Breakdown of number of Monitoring visits per Host Organisations:

No. of Monitoring Visits	No. of Host Organisations
20+	1
10 - 19	7
5 – 9	28
1 – 4	3,225
Total:	**3,261**
Total number of individual Host Organisations:	**16,929**

SNA Data Match Results:

Description of Test	No. of Cases
Number of SNA internships currently in Primary Schools	90
Number of schools with SNA interns	71
Number of schools with more SNA interns than allocated SNA's	35

Appendix 2:

(i) UP51c Case Examination:

A total of 80 UP51c's that were received in NCC between January 2014 and April 2015 were examined and the following are the results:

1. Current Status of the internships examined:

Status	No. of Cases
Currently on Programme	34
Finished – Early	24
Finished – Full	22
Total:	**80**

2. Status of "Finished – Early" cases:

Reason	No. of Cases
Got job with Host Organisation	3
Got job with Host Organisation – PRSI Scheme	0
Got job elsewhere	6
Returned to job search	1
Other – Various	14
Total:	**24**

3. Status of "Finished – Full" cases:

Reason	No. of Cases
Got job with Host Organisation	9
Got job with Host Organisation – PRSI Scheme	2
Got job elsewhere	1
Returned to job search	4
Other – Various	6
Total:	**22**

4. Breakdown of duration of internships:

Duration	No. of Cases
6 months	16
9 months	64
Total:	**80**

5. Has DSP completed the following information on the UP51c?
Result:

Information field	No. of Cases
Stamped	7 cases not stamped
Signed by Officer	All cases signed
Officers Name Printed	3 cases had no printed name
Dated	1 case was not dated

6. Has DSP indicated that intern has been in receipt of payment for the correct period i.e. 78 days for JA/JB/JBCO/OFP and 13 weeks for DA?
Result: In all cases, this was indicated on the UP51c.

7. Is this correct per ISTS and BOMi?
Result: Yes. Correct in all cases.

8. Has the Host Organisation completed the following information on the UP51c?
Result:

Information field	No. of Cases
Company Name	Yes in all cases
Proposed Start Date	Not completed in 1 case
Proposed Finish Date	Yes in all cases
Signed on behalf of the Host Organisation	Yes in all cases
Company Stamp	No company stamp in 18 cases

9. Did internship commence prior to DSP approval?
Result: No in all cases

10. Has ISTS been updated correctly for JA/JB/JBCO cases?

Result:

Information field	No. of Cases
Was Category Code "INTN" entered	Not updated in 2 cases one of which the internship only lasted for 1 week
Was URA/URB of €50 updated	Yes in all cases
Does the "To Date" match internship end date	In 4 cases it does not match
Has a review date been entered	In 3 cases no review date was entered

11. Has BOMi been updated correctly for all DA cases?

Result:

Information Field	No. of Cases
Has a recurring Exception Payment Generator been set up	Yes in all DA cases
Do eligible dates match the internship dates	Yes in all DA cases

12. Does Date of Birth on UP51c match CRS details?

Result: In 1 case the dates of birth are different.

13. Has NCC validated the Host Organisation correctly?

Result: In 6 cases the Host Organisation has not been validated correctly and in another 9 cases there isn't enough information to give a definitive answer.

14. Is the Host Organisation legally registered?

Result: In 4 cases, registration of the Host Organisation could not be traced on either CRS or CRO. In another case, a college registered on Jobs Ireland in its own right but comes under an Educational Training Board.

15. Is there at least 1 full time employee working for the Host Organisation?

Result: Cannot say definitively in any case as it is not stated on CRS.

16. Is there any evidence that the intern has a current or previous employment relationship with the Host Organisation?

Result:

- In 2 cases the interns have a relationship with the ER per CRS.
- One case cannot be checked as the ER number cannot be traced.
- In 4 cases the question was not answered but CRS checked

17. Does the number of employees stated on the UP51c match the latest P35 return?
Result:

- In 45 cases the number stated does not match the latest P35
- In 21 cases this cannot be answered (figure not stated on UP51c/No P35 return per CRS)

18. Does the number of interns with a Host Organisation at any one time adhere to the guidelines?
Result:

- In 5 cases the guidelines have not been adhered to
- In 10 cases this cannot be answered (No P35 returns/ER cannot be traced)

19. Has a Monitoring Visit been carried out?
Result: A monitoring visit was updated on Sharepoint in 13 of the cases examined.

20. Is the stated weekly duration of the internships between 30 and 40 hours?
Result: Yes in all cases

21. Has any intern exceeded the cumulative time of 18 months that can be spent on Job Bridge internships?
Result: No intern examined has exceeded the limit of 18 months.

22. Were any of the internships examined in the excluded sectors (trades)?
Result: None were in the excluded sectors.

23. Were UP51c's noted as "DSP Verified" on CSS?
Result: All cases were noted.

(ii) Monitoring Visits Case Examination:

1. Documentation not available on file:

Type of Documentation Required	Dublin Central	Dublin North	South East	North East
NIS record from CSS for each case	Yes	Yes	Yes	No – 1 case
Evidence that compliance record has been checked	No – 1 case	Yes	No - 3 cases	No – 1 case
Copy of original Internship Advertisement	No – 28 cases	No- 6 cases	Yes	No – 19 cases
Standard Agreement or evidence that it was examined	No- 3 cases	Yes	Yes	No – 3 cases
Signed monitoring checklist (Intern portion)	Yes	No – 3 cases	Yes	No- 1 case
Signed monitoring checklist list (Mentor portion)	No – 2 cases	No – 3 cases	Yes	No- 1 case
Checklist completed in full by Intern	No – 2 cases	No – 6 cases	No – 1 case	No – 1 case
Checklist completed in full by Mentor	No – 4 cases	No – 3 cases	Yes	No – 1 case
Monitoring report signed by Case Officer/Employment Engagement Officer	No – 8 cases	No – 7 cases	No – 6 cases	Yes

2. Does the outcome of the monitoring visit updated on Sharepoint correspond with the evidence on file?

Division	Do outcomes match	Comments:
Dublin Central	Yes	
Dublin North	No – 2 cases	Both cases are compliant per written report but updated on Sharepoint as Non-Compliant
South East	Yes	
North East	No – 3 cases	Two cases are compliant per written report but updated as Non – Compliant and in the third case, the written report wasn't completed.

3. Have reasons for unsatisfactory conduct or non-compliance been recorded where applicable?

Division	Non-Compliant cases	Reasons recorded	Were issues followed up?
Dublin Central	7	Yes	Yes
Dublin North	2	N/A	Updated as non-compliant even though both internships had to be terminated, all issues in relation to monitoring were fine
South East	1	N/A	Visit did not take place as internship was terminated by HO
North East	4	No – 1 case	Issues followed up in some areas. One case – compliant per written report but updated on Sharepoint as non-compliant. Mentor named but not interviewed, overdue compliance was highlighted and SA was requested 3 times.

Appendix 3. Management Response to JobBridge Internal Audit Report

Managment Response To Internal Audit Report 06/2015

Response Date: 22.02.16

Subject: JobBridge

Report No. 06/2015 **Date Completed:** 22.06.2015

JobBridge Policy Unit and National Contact Centre

Asst. Secretary: John Mc Keon

Principal Officer: Paul Carroll

JobBridge Policy Unit

Asst. Principal: Claire Cummings

HEO Manager: Declan Nugent

National Contact Centre

Asst. Principal: Aidan Mullally

Management Response January 2016

The purpose of this paper is to respond to any and all concerns raised during the recent Audit of the JobBridge Scheme whose broad objectives where:

- To evaluate the adequacy and effectiveness of controls and procedures in the operation of the JobBridge scheme.
- To make appropriate recommendations where necessary.

The plan is to outline each of the findings as listed in the Audit report and respond accordingly while outlining the remedial action to be taken as well as long term solutions to be put in place.

Internal Audit Executive Summary Comments

The main high concern issues found during the audit were:

- Host Organisations make a declaration that they comply with the terms and conditions of the JobBridge scheme when registering a JobBridge internship. No checks are carried out by either the NCC or at monitoring visits to verify this.
- The JobBridge policy unit stated that CSS which is a Fás/Solas system is not backed-up since June 2014 when Solas de-commissioned the back-up server and moved their own data to the cloud but did not move DSP data. There is a risk of data loss until all CSS data has been transferred to the new Activation Case Management (ACM) system.

The medium rated concerns refer to

- The Service Level Agreement between DSP and Solas expired in December 2014. This is creating administrative difficulties for DSP staff.
- Aspects of the JobBridge monitoring reports, database and procedures.

Management Observations

The executive summary comments above are addressed in the detailed responses below.

With regard to the first of the high-concern issues above is important to note that JobBridge is an entirely voluntary scheme that does not involve the payment of any monies by the State to Host Organisations (HOs). The State relies on the HOs to offer internship opportunities in order to provide unemployed jobseekers with an opportunity to secure work experience and prove their competence to prospective employers. The only payment made is a 'cost of work' top-up of €52.50 per week to the jobseeker. The Department through its JobsIreland website facilitates HOs to offer internships and Jobseekers to search, filter and apply for internship opportunities. The Department, on this site, sets out the requirements of Host Organisations and asks them to self-declare that they comply with these requirements. These include both general requirements that apply in all forms of employment (e.g. that they are properly insured

for employers liability, comply with health and safety legislation etc) and JobBridge specific requirement (e.g. the appointment of a mentor, the completion of a 'standard agreement etc.).

A deliberate policy decision was taken when the scheme was implemented not to vet employers for compliance with these requirements at the advertisement stage but instead to rely on self-declaration and random monitoring/inspection visits to assess compliance of those internships that do commence (many advertisements do not convert into an active internship). In addition the focus of the monitoring/inspection visits was to be on the JobBridge specific requirements rather than the general employment law requirements. Compliance with the latter is in the competence of the Department of Jobs Enterprise and Innovation (via NERA). They are referenced in JobBridge in order to enable the Department to withdraw or cancel internships if it is notified, or becomes aware, that a HO has been found to contravene these general employment law requirements.

Management is satisfied that the approach of self-declaration supported by random monitoring visits is both appropriate (given the need to simplify administration and make the scheme easy to use) and proportionate (given the voluntary nature of the scheme, that no monies are paid by the State to HOs and that the number of participants on the scheme is relatively small – c 5,000 at any point in time).

Nevertheless in responding to the points raised by the Internal Audit team management is making some changes to add extra checks to its monitoring and inspections process. These are outlined further in the detailed responses.

With regard to the second high concern issue management can confirm that JobBridge data is in fact backed up and stored off-site on a nightly basis. The jeopardy referred to is in fact the closure, by SOLAS, of an emergency standby site for use in the event of a major hardware failure (e.g. due to fire or flooding). The nightly back-up tapes can however be used to restore data in the event of a major outage. In addition Management assess that the probability of a major hardware outage weighted with the business impact of such an outage does not warrant the implementation of an expensive stand-by solution in the interim period pending the implementation of the new JobsIreland system.

This point is elaborated further in the detailed responses.

With regard to the medium concern issues management can confirm that the SLA with SOLAs has not expired and is still in place (it is extended automatically every six months unless otherwise agreed between the parties).

The issues relating to the monitoring reports etc. are dealt with in the detailed responses.

Detailed Responses. (Note: responses are to each *observation* rather than recommendation)

Audit reference 3.1 (1):-

Host organisations must first register in order to advertise either a job vacancy or an internship on the Jobs Ireland website. Registration can be done directly through the Jobs Ireland website or via the Welfare website. The system (which was inherited from Fás) does not recognise duplicate employers so host organisations can register multiple times. Staff at the NCC stated that they manually check for duplicates to ensure that host organisations do not exceed the total allowable internships. The manual checks were observed on the audit site visit. However an examination of the CSS Database which contains all registered host companies identified 1,116 individual Companies but the contact details were used more than once. The following are some of the examples identified (full details can be found at Appendix 1):

- 18 individual companies used the same contact details (Limerick LES)
- 11 companies (2 registered four times, 1 registered twice and 1 registered once) have the same contact details. All companies are in the food/restaurant sectors.
- 7 different companies used the same contact details (a recruitment service)
- 11 other companies used contact details for what looks like 2 more recruitment services.

Response:

The issue of multiple company registrations and the reasons for this was discussed. Many companies can register multiple times due to loss of log in details, Host Organisations (HO) system administrator leaves etc. Where a company has multiple registrations the information provided will be the same in each case. A de-duplication process for duplicate profiles is not available on the current Jobs Ireland system. A new Jobs Ireland system is currently being developed the new system will have the ability to prevent Employers/Host Organisations from creating multiple registrations. The New Jobs Ireland system is expected to be functional in Q2 2016.

However our office at the National Contact Centre (NCC) undertook to run a report of HO with multiple registrations aimed at identifying whether the multiple entries had resulted in incorrect numbers of interns being assigned to HO. The result of this exercise found that no such instances had occurred.

Our Office at the NCC also advise that they will be manually checking any such instances which occur in the interim period between the old system becoming defunct and the new IT system coming online.

The issue of shared contact details/acting as recruiters was raised by the Audit team however upon inspection the office at the NCC found that in fact the instances referred to where recruitment companies had advertised for interns where in fact legitimate internships based at the recruitment office and not at a third party HO.

Audit reference 3.1 (2):-

Host organisations are only asked to state the number of employees they have and not if they are full-time or part-time. While a company registered number is sought, this is not always supplied and it does not have to be a Revenue employer registered number (ERN). Of 80 cases examined, the number of employees listed when registering compared to the number of employees in the last P35 return on Central Records (CRS) agreed in only 14 cases. No checks are carried out by the NCC on this when validating an employer for JobBridge. The number of employees has a direct link to the number of internships a host organisation may offer.

Response: Our office at the JobBridge Policy Unit undertook to manually check the registered P35s of each of the HO identified in this instance aimed at identifying whether registered number of employees had resulted in incorrect numbers of interns being assigned to HO.

The result of this exercise found that only one such instance had occurred however this was in a Department of Education facility and the ERN supplied related to the management board and not the actual school therefore the Host Organisation did not have an incorrect number of interns.

JobBridge Policy Unit and the NCC nominated staff members have now been granted access to the ERIN system which allows them to manually check the P35s of each HO when they apply to offer an Internship. This will now form part of the standard validation process going forward.

Audit reference 3.1 (3):-

In 3 cases examined, the only employees of the host organisation on CRS were either the owner and or his/her spouse – both paying self-employed contributions thus rendering the host organisation ineligible.

Response:

Our guidelines state that to partake in the JobBridge scheme

- An organisation, or a local branch, must have a minimum of 1 full time employee who is employed for 30 hours or more per week (i.e. on payroll and subject to PAYE and PRSI)

Where anomalies which refer to the technical rules of the scheme occur we would tend to find in favour of the Internship taking place as this is fundamental to the success of the scheme. This would occur in a very small number of cases and each case is dealt with on its own merit.

Audit reference 3.1 (4):-

In 4 cases, registration of the Host Organisation could not be traced on either CRS or the Companies Registration Office (CRO). In another case, a college registered on Jobs Ireland in its own right but comes under an Educational Training Board.

Response:

Our unit at the NCC reviewed each of these cases and found that they were in fact trading under different names i.e. using initials instead of the full company name. Each company has been contacted and details updated on the JobsIreland system.

In relation to the college our unit at the NCC confirmed that they used their own name to allow possible Interns to make an informed decision but used the ETB ERN.

The new JobsIreland website will not allow a company to register unless a valid ERN is entered and this will ensure that queries such as this do not arise into the future.

Audit reference 3.1 (5):-

Host organisations must have public/employers liability insurance and motor insurance, if applicable, that will cover any Interns on the JobBridge Scheme. They must also be fully compliant with current workplace Health and Safety and all other legal and sectoral requirements.

The host organisation declares that it will comply with these conditions and other conditions of the scheme by ticking a box when registering the JobBridge internship.

The host organisation is not asked to supply documentary evidence to prove they fulfil the above criteria nor are any checks carried out by either the NCC or at monitoring visits.

Response:

Our Policy Unit reviewed this practice and has applied an extra measure to ensure that insurance and safety statements are in place.

Departmental staff who carry out monitoring visits to HO are now required to ask and view a copy of both the public/employers liability insurance and the Health and Safety Statement. They will enter the details of same onto the current monitoring SharePoint site.

In addition the new IT system scheduled to come online in Q2 of 2016 will have an added feature whereby a company can input the insurance details (i.e. policy number and insurance company name).

Audit reference 3.1 (6):-

Employers make a statement on their application that the intern is not displacing a job vacancy. It is not possible to verify whether or not the internship is displacing a potential job vacancy.

Response:

Any employer who has current vacancies or live vacancy advertisements are excluded from participation on the JobBridge the scheme.

Departmental staff who carry out monitoring visits also ensure that interns are not partaking in a body of work that would have otherwise been filled by a paid employee. This is done through separate interviews with both the mentor and the participant.

Secondly participants themselves are advised of the terms and conditions of the internship and have a number of ways in which they can contact the Department if they feel that they are being mistreated during the course of the internship (i.e. doing the work of a paid employee).

Audit reference 3.1 (7):-

No checks are carried out against Redundancy payments issued.

Response:

Redundancies are usually notified to the NCC staff and as such they ensure that no internships are advertised for these companies.

As a secondary measure our JobBridge Policy Unit has made contact with the Department's Redundancy and Insolvency Unit to firstly review all cases where redundancies took place in 2015 and secondly to be included on any or all notifications for future redundancies. It is worth noting that this unit only deals with cases where an employer is not in a position to make redundancy payments and so will not cover the broad spectrum of employers.

As a further measure our JobBridge Policy Unit has made contact with the Department of Jobs Enterprise and Innovation to request that they supply us with a copy of all redundancy notices. We have received notification that we will now be included on the circulation lists going forward.

Audit reference 3.2 (1):-

Plans to develop a new Jobs Ireland website are at tender stage with the Final Request For Tender due to come before the evaluation board soon. The new Jobs Ireland website will replace the existing one and the 'Prof' system used by NCC to validate employers/JobBridge internships. Once a contract is awarded, the project is likely to start Aug/ Sept 2015 and likely to be operational towards the end of Q2 2016.

Response:

Contract Awarded and New system likely to be operational in Q2 2016

Audit reference 3.2 (2):-

Activation Case Management (ACM) has been developed on BOMi to replace CSS. The transfer of CSS clients to the BOMi ACM system has commenced since the beginning of June 2015.

Response:

Transfer of information and national rollout of BOMi ongoing

Audit reference 3.2 (3):-

All JobBridge cases will be administered from the new Jobs Ireland website and ACM when both are fully developed and operational and will replace the old Fás systems.

Response:

Contract Awarded and New system likely to be operational in Q2 2016

Audit reference 3.2 (4):-

A Service Level Agreement (SLA) was drawn up between the Department of Social Protection (DSP) and FÁS when DSP took over responsibility for the Fás employment service and community services employment programmes from January 2011. This SLA expired in December 2014 and has not been extended. DSP staff told the audit team that since then, it is difficult to get Solas staff to deal with any system related queries which they have or to get specific stats in order to reply to e.g. Parliamentary Questions. Reliance is placed on ex Fás staff which has since joined DSP personally contacting former colleagues. There is no standard format for reports received from Solas and it's difficult for DSP staff to stand over them.

Response:

The SLA referred to has not expired. The SLA is still in place, it is extended automatically every six months, and remains in place until it is reviewed or changed by agreement of SOLAS and DSP. This position is agreed by both SOLAS and DSP.

A number of former Fás IT staff have transferred into the Department and provide IT support for the system. Staff in SOLAS, where the system is physically hosted, can also be called on to assist as required. This arrangement has been clarified to the staff in the NCC. All reliance on staff in SOLAS to provide support will be eliminated when the new Jobs Ireland websites is implemented. The contract for this system has been awarded and the system is likely to be operational in Q2 2016

Audit reference 3.2 (5):-

All data on the CSS system was held on a back-up server by Solas. However, JobBridge Policy staff stated that in June 2014, this server was de-commissioned by Solas and they now back up their own data in the Cloud. No provision was made for the back-up of DSP data and it is currently not backed up. The audit team have been unable to get confirmation of this from Solas despite numerous communications.

Response:

The data on the JobsIreland system is backed up nightly in the SOLAS HQ premises and these back-up tapes are stored off-site. The issue referred to relates to the closure of an off-site standby-server set-up, previously used by FÁS, to provide resilience in the case of a major hardware outage at the SOLAS HQ site/compute room (e.g. due to fire or flooding etc.). This issue has been considered by the Department and a report was prepared in January 2015. This report concluded that the weighted risk based on the probability of the event occurring and the impact on the business is not so high as to warrant the implementation by the Department of a back-up standby site in the interim period pending the implementation of the new JobsIreland system. (It is to be noted that the off-site back-up tapes can be used to restore data damaged in a major outage – with a maximum loss of 24 hours transactions). The new Jobs Ireland website, which is cloud based, is due to go live in Q2 2016.

Audit reference 3.3 (1):-

At least 5% monitoring visits are carried out in all divisions with some divisions carrying out 100% monitoring.

Response:

5% is the minimum amount of monitoring visits required to be carried out in each division nationally on a monthly basis. Targets are set each month and records of monthly visits carried out and percentages reached are updated and sent to Divisional managers on a monthly basis by the JobBridge Policy Unit.

Where a division is seen to be falling below the minimum target set the Divisional manager is contacted and the reasons for same discussed i.e. building closures and movement of staff may result in a shortfall in a specific month.

Audit reference 3.3 (2):-

Not all required documentation is held on the monitoring visit files. *

Response:

This section refers to the monitoring report guidelines issued to Departmental staff.

What information is needed to conduct a monitoring visit?

- Print out of the interns NIS record from CSS
- Check Compliance Record is up to-date (see CSS)
- Copy of Original Internship Placement Advert (available on CSS by inserting internship reference number)
- Copy of Standard Agreement (to be provided by the Host Organisation). In case of under 25s an original of Standard Agreement is to be kept by DSP.
- Copy of JobBridge Monitoring Checklist.

The guidelines issued are only meant as a 'guide' for staff to enable a thorough investigation and ensure that staff have any relevant information that they may need to hand, at no point is it noted that copies of these documents must be retained on a file. Many of the documents listed are available through our online systems (see notes beside each document) and therefore paper copies are not required. The Monitoring checklist is then required to be updated on the SharePoint system within 5 days.

Audit reference 3.3 (3):-

While the results of monitoring visits should be updated on SharePoint immediately, there are no specific guidelines detailing when a result should be updated where further information has been requested by DSP. In some cases the result was updated as non-compliant and when the information was received, a new result of compliant was updated. In other cases, the result wasn't updated until all information was received and in other cases, a non-compliant result was updated immediately and not amended when the information was received.

Response:

It is important to note that the purpose of a monitoring visit is to check compliance with the JobBridge Standard Agreement. Departmental staffs carry out these visits and in cases where documentation is outstanding etc. they can enter on the system a note of non-compliant while affording the HO an opportunity to remedy the situation. Similarly a HO can be advised to return said documents within a given timeframe i.e. within 3

working days and then the case notes can be updated as compliant (e.g. Standard Agreement kept at head office and not on site)

While affording HO due process the Department's staff must also ensure that the scheme rules are adhered to. Upon follow up with a HO and any or all documentation being produced an update of compliant can be made to the monitoring record.

Cases where a non-compliant entry remains will be followed up on by the JobBridge Policy Unit in conjunction with the local division to ensure that the scheme rules are being adhered to.

Audit reference 3.3 (4):-

Officers conducting monitoring visits do not have powers of investigation similar to a Social Welfare Inspector (SWI). Where an issue arises, the case has to be referred to a SWI if an employer is not co-operative.

Response:

Case Officers who conduct monitoring visits are not trained on investigation duties. It is also important to note that no host organisation (HO) receives any payment from the Department and that the purpose of a monitoring visit is to check HO compliance with the JobBridge Standard Agreement. Where an issue arises which may impact on the jobseeker's welfare payment or his/her entitlement to that payment the correct procedure is to refer the case to a SWI for further investigation and also to notify the JobBridge Policy Unit. There are no plans to change this procedure at present.

Audit reference 3.3 (5):-

With the exception of the Standard Agreement, no other documentation e.g. time sheets, staff records to show employees are employed at least 30 hours per week, Public Liability Insurance etc. is checked during the monitoring site visit

Response:

Most of the documents referred to (public liability insurance, staff records etc.) are documents that all employers are legally obliged to hold and are not specific to JobBridge. The requirement in the JobBridge conditions that an employer must hold these documents is simply a restatement, for the avoidance of doubt, of national law. As employer and jobseeker participation is voluntary and in order to streamline administration of the scheme it was never intended that JobBridge monitoring visits would be used inspect compliance with national laws, compliance with which are in the competence of other State bodies such as NERA. Nevertheless the JobBridge Policy Unit has reviewed this practice and Department staff who carry out monitoring visits to HO are now required to ask and view a copy of both the public/employers liability insurance and the Health and Safety Statement. They will enter the details of same onto the current monitoring SharePoint site.

In addition the new IT system scheduled to come online in Q2 of 2016 will have an added feature whereby a company can input the insurance details (i.e. policy number and insurance company name).

Audit reference 3.3 (6):-

The SharePoint database can be accessed by anyone who has been given the correct permissions. This means that someone other than the officer that carried out the monitoring visit can update the results. In 19 of the 155 cases examined there was no signed copy of the report on file. 13 had a printout of the SharePoint result only and 6 had a label with the officers details typed.

Response:

Our Policy Unit reviewed this practice and has updated the SharePoint site. Users can read all items however they can only create and edit their own items.

Audit reference 3.4 (1):-

587 cases identified with Graduate, Intern or Trainee in the title of the advertised position

Response:

Staff at the NCC vet all applications before they go live and all job specifications are checked to ensure they fall within JobBridge guidelines.

Notwithstanding this our team at the NCC have manually checked all cases like those noted above which have occurred within the last 12 months (February 2015 – January 2016). In all 73 of those cases the advert has been changed to remove the words Graduate, Intern or Trainee from the title.

In relation to the cases which occurred prior to February 2015 it has been noted but no remedial action can take place as these claims are now archived and no longer live.

We envisage that the new IT system and P35 checks and the fact that this has been highlighted as an issue to the NCC staff will prevent any future occurrences of same; however we plan to run ad hoc queries to ensure we are meeting our own standards.

Audit reference 3.4 (2):-

237 cases where the number of Employees is blank

Response:

JobBridge Policy Unit undertook to review any or all HO where the employee number was blank. It was found in all cases that the HO did not exceed the allowable number of interns.

The new IT system due to go live in Q2 2016 will have a mandatory field for number of employees to be entered as well as the checking of the P35 by NCC staff before an advert goes live.

Audit reference 3.4 (3):-

A list of actual posts/job titles that exist within Primary and Secondary schools was compiled by Policy Unit in conjunction with the Dept. of Education and Skills. Since 1/10/2014, only job titles that are contained in this list will be accepted and validated for internships for Primary and Secondary schools.

A data match was carried out between this list and internships that commenced in Primary and Secondary schools since 1/10/2014 and 160 internships were identified where the advertised posts do not appear on the list. (Please see Appendix 1 for a comprehensive breakdown)

Response:

While this list was deemed to be a comprehensive list at the time there was only a suspension of certain job titles (caretaker/cleaner) for the duration of the review into JobBridge in the education sector.

In the case of other internship opportunities not on this list the school/ETB in question must provide the Department of Social Protection with details of the proposed duties of the opportunity concerned. In such cases the Department of Social Protection may consult with the Department of Education before accepting an advertisement for publication on the JobBridge site.

The new guidelines for JobBridge in the education sector where agreed and signed off by An Tánaiste in January 2015.

Audit reference 3.4 (4):-

Number of SNA internships does not match the number of SNA's. Fifteen schools have no SNA posts allocated by the National Council for Special Education in 2014/15 but they have SNA interns.

Response:

JobBridge guidelines do not indicate that a like for like job to internship must exist within any given sector. In relation specifically to the education sector it is felt that an SNA intern will be working with a teacher/principal on a daily basis and in line with JobBridge guidelines.

'The school/ETB must assign an individual with appropriate experience and expertise in the duties expected to be performed by the intern to provide visible and meaningful support in the role of a mentor to the intern during placement. Interns should not, however, work unsupervised or unaccompanied for extended periods of time (i.e. no more than one day **per week).'**

UP51c Intern eligibility forms

Audit reference 3.5 (1):-

All interns had been in receipt of a qualifying payment for the correct period prior to commencing the internship.

Response:

All potential interns are checked for eligibility by their local Intreo office prior to commencing the internship.

Audit reference 3.5 (2):-

In 2 cases the interns have a previous employment relationship with the Host Organisation per CRS

Response:

Previous versions of the UP51c did not require an intern or HO to state if they had a prior employment relationship, this had been rectified prior to the audit and the newer version contains this question.

In certain cases an exception to the ruling can be made by the JobBridge Policy Unit depending on the circumstances; however each case is dealt with on its own merits.

Audit reference 3.5 (3):-

All interns had been awarded the €50 top-up payment. However, the "To Date" does not match the internship end date in 4 cases.

Response:

In some cases an initial internship can be for a 6 month period however a HO can, in accordance with the terms of the scheme, request that this be changed to a 9 month period and vice versa.

However once a finish date is entered by the HO this triggers a report to the Local Intreo office to cease payment of the top-up allowance. Any cases of overpayment are dealt with under normal practices by the Local Intreo Office.

Audit reference 3.5 (4):-

In 45 cases the number of employees stated by the Host Organisation does not match the latest P35 return and in 21 cases, the number of employees could not be established as there was no figure stated on the UP51c or there was no P35 return made.

Response:

It is important to note that P35s, which are returned periodically via the Revenue Commissioners, are often an unreliable indicator of the number of staff employed by an organisation at any point in time (staff numbers can vary between P35 filing periods).

Nevertheless the JobBridge Policy Unit undertook to manually check the registered P35s of each of the HOs identified in this instance aimed at identifying whether registered number of employees had resulted in incorrect numbers of interns being assigned to HO.

The result of this exercise found that only one such instance had occurred however this was in a Department of Education facility and the ERN supplied related to the management board and not the actual school therefore the Host Organisation did not have an incorrect number of interns.

JobBridge Policy Unit and the NCC nominated staff members have now been granted access to the ERIN system which allows them to manually check the P35s of each HO when they apply to offer an Internship. This will now form part of the standard validation process going forward.

Monitoring reports

Audit reference 3.5 (1):-

In 18 cases, the monitoring checklist had not been completed in full by either the mentor or the intern.

Response:

The administrative function of carrying out monitoring visits is carried out by local Intreo Staff.

The JobBridge Policy Unit rely on the guidelines being followed and adhered to in full and any shortfalls such as those list above are down to human error.

Guidelines have been reissued to divisions and staff reminded to ensure that all necessary documentation is completed in full.

Audit reference 3.5 (2):-

5 cases identified where the mentor named on the checklist or in the Standard Agreement was not the person interviewed without an acceptable reason e.g. mentor had changed due to maternity leave

Response:

When carrying out a monitoring visit Department staff will meet with either the mentor or a nominated person where the mentor is unavailable i.e. holidays, sick leave, meetings etc. Divisional staff will be reminded to record a reason in circumstances where the assigned mentor is replaced by a nominee.