



STAGE 1 AND 2 GTF COMPLIANCE REPORT

Report on the compliance of Generali Fund in Memory of the Generali Insured in East and Central Europe Who Perished in the Holocaust (“Generali Trust Fund” or “GTF”) with the auditing standards issued by the International Commission on Holocaust Era Insurance Claims (‘ICHEIC’).

18th July 2005

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Executive Summary

We have completed, under a letter of engagement dated 17th March 2004, a Stage 1 (Standard 5) and Stage 2 audit of the GTF. Stage 1 for Standards 1-4 for Generali have been covered by PricewaterhouseCoopers (PwC) and PKF and are outside the scope of this review.

Our objective under Stage 1 was to verify the controls placed in operation by the GTF over the claims handling process and under Stage 2 to substantively verify the outcome of the claims handling process.

For Stage 1 we designed and performed tests on the controls put in place by GTF. We reviewed a representative sample of 123 claim files and found that 33 of these files had at least one control failing. As described in appendix 4 when we discussed the control failings with GTF, they stated that the process they have followed in processing the claims is not as we have understood it, and is consistent with the documentation, and that their procedures have evolved over time and each change and special instance is not catered for.

As a result of the above we have concluded that GTF have not complied with standard 5 in that:

- The documentation of the claims process is not sufficiently clear to define the process and controls without ambiguity; and
- The audit trail is not sufficient to evidence the operations of all controls and the status of the files.

For the Stage 2 audit we selected a total of 596 claims and substantively verified the final outcome of the claim processing. In the case of the claims that resulted in a no-match conclusion (304 files) we reperformed the matching process and in the case of files that resulted in a match (292), and therefore an offer or statement that the policies had no value, we reperformed the calculation or verified the reason for non-payment. 61 (10%) of the 596 files sampled had a substantive error. We also found further examples of control failures. Taking together the results of our Stage 1 and 2 work we reach the following conclusions.

Our Conclusion

As 25% of the files sampled had control failures and 10% had substantive failures we conclude that the controls designed and operated by GTF are inadequate to ensure the accurate and reliable processing of ICHEIC claims according to ICHEIC guidance.

In addition, given the number of substantive failures, we are unable to conclude that claims are being processed in accordance with ICHEIC's guidance.

Responsibility

We take responsibility for this report. The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. This report is for ICHEIC and GTF and prepared solely for the purposes set out in our engagement letter. No other party is entitled to rely on our report for any purpose whatsoever and we accept no duty of care or liability to any other party who is shown or gains access to this report.

A handwritten signature in black ink that reads "Deloitte & Touche LLP". The signature is written in a cursive, flowing style.

Deloitte & Touche LLP

London

18th July 2005

Our Approach

Stage 1

We gained a detailed understanding of GTF's claims handling process through:

- Interviews with the claim handling team leaders, some of the claim handling staff, the CEO, the IT consultant and the head of finance;
- Walking through a number of sample files with the GTF staff to understand the end-to-end process; and
- Review of the GTF 'guide to claims processing'.

This understanding was used to identify the key controls that operate over the claims process, see appendix 2. We tested the operation of these controls for a sample of claims. A total of 123 claims were selected so as to get a representative view of the overall operation of the controls. The method used to select the sample is documented in appendix 1. The operation of each control was tested through a review of the physical files relating to the claim and the computerised records of the claim processing. Where a control has operated properly, or the evidence of its operation had not been retained, this fact was recorded in our working papers. The test results are summarised in the next section of the report and discussed in more detail in appendix 4.

Our review and testing was limited to Standard 5 of ICHEIC's auditing standard. The reader should consult the Stage 1 reports on Generali for details of the operation of Generali's controls and in particular Standards 1 – 4.

Stage 2

We divided our Stage 2 substantive testing of the claims into two separate areas of work, 'No-Match' and 'Complete' claims. This separation was done to take account of the different risks that needed to be tested for each category – these are described below.

We selected 304 claims that had been classified by the GTF claims handling process as a No-Match i.e. no Generali policy could be found that matched the details provided by the claimant and 292 Complete claims. Complete claims are those that result in at least one match and therefore either the policies will be not-payable or an offer will have been made.

We divided the work into these two areas as the primary risk for each sample population is different. For No-Matches the primary risk is that a potentially fruitful match is not investigated or that a match is incorrectly rejected. For Completed claims the primary risk is that the offer is for the wrong amount, no offer being the extreme case of this.

The sample selection is described in appendix 1, the tests are described in appendix 3 and the detailed results are presented in appendix 4.

Summary of Findings

We identified a total of 256 issues in the 719 files we sampled, we have classified these as follows:

- Compliance failure – the failure to operate a GTF prescribed control.
- Substantive failure – a failure that could or has led to an incorrect outcome such as an under/over payment or a potentially valid policy being ignored in the processing of a claim.

Our testing was divided into the following three components:

- Control – Stage 1 compliance testing.
- No Match – Stage 2 substantive testing of claims that resulted in a “no match” conclusion.
- Complete – Stage 2 substantive testing of claims that resulted in offers being issued or the claimant being informed that the policies were not payable.

Table 1 shows the distribution of the 256 issues identified between these categories.

Table 1

	Control failure		Substantive failure	Total
	Right of appeal	Other		
Control	27	6	13	46
No match	20	19	41	80
Completed	98	10	22	130
Total	145	35	76	256

As a single claim can have more than one issue, we have summarised our results based on files with issues. A total of 180 or 25% of files from our sample of 719 files have some kind of control issue. 74 or 10% of these files have at least one substantive failure as shown in table 2 below.

Table 2

	Control failure		Substantive failure	Sample
	Right of appeal	Other		
Control	27	6	13	123
No match	20	19	40	304
Completed	98	10	21	292
Total	145	35	74	719
	20%	5%	10%	

Our Recommendations

GTF have had sight of, and commented on, all of our detailed findings and a copy of this report. GTF are already working to investigate the substantive failures reported and in some cases have already rectified the reported issue.

As a result of the number of control and substantive failing identified we would recommend:

- A notice is sent to all claimants, who were informed of GTF's final decision prior to August 2003, that they have the right to appeal, setting out the process for them to do so if they so wish.
- The calculation of all claims paid are reviewed for correctness and in particular to check that any policy bonuses have been treated correctly.
- For No-matches with a score greater than 50 on the policy holder or insured's details a check should be made whether the water copy has been requested and used in the matching process. Where this is not the case the water copy should be requested and the match re-performed. As a practical measure GTF may wish to start with match scores of greater than or equal to 70 and depending on the results move on to include match scores of 60 and then if necessary 50. GTF should share the results of each part of this work with ICHEIC so that ICHEIC can determine whether to progress to the next tier.

It came to our notice whilst performing our review that a number of the controls in operation seem to add little value to the process and therefore just delay the process. In particular this is true of the requirement of the trustees to sign-off on the unnamed no-match claims. We therefore further recommend that GTF takes this opportunity to review its control framework to improve both the efficiency and efficacy of its controls.

Appendix 1: Sample Selection

GTF provided us with an Excel spreadsheet containing a list of all of their ICHEIC claims, including those received from Generali, for which the claims process had been completed. Each record contained the ICHEIC reference, the name of the team, if applicable, that has processed the claim and the final status i.e. paid, not payable or no-match. A total of 12,741 records were provided.

Stage 1 Sample

The data was loaded into an Access database for manipulation. A separate table was created for each of the three teams and one for the 'others'. Others include claims not allocated to a team and those processed by a temporary team. The claims in each table were sequentially numbered and then a sample was selected using an appropriate modulus function and '7' as the selection criteria. For example 1483 of the records were processed by team A. To achieve the required sample of about 30 we selected all the files with a value of 7 having applied a modulus of 49 to the index applied to the table. This yielded a sample of 31 claim files for Team A.

Stage 2 Sample

The source data was divided into separate tables for No-Match and Complete i.e. paid and not payable combined. These were further divided into tables for each team and then the same modulus selection method described above was used to select the sample.

Appendix 2: Stage 1 Compliance Tests

The following tests were carried out on the Stage 1 sample. The tests all have the answers *yes*, *no* or *n/a*. The answer *no* represents an issue. Each issue was categorised, as described in appendix 4, as either a control or substantive failure.

Test	Test Description
Physical file	<p>Does the physical file exist and include the ICHEIC claim for all named and matched claims?</p> <p>Risk addressed: CLMS make transcription errors. The physical claim form enables the claim processor to confirm the accuracy of the data used for matching.</p>
Names enriched	<p>Have all of the names, supplied by the claimant, on the claim form (claimant, policy holder, beneficiaries) been sent for enrichment?</p> <p>Risk addressed: The claimants do not always understand the insurance terminology and could for example confuse insured with beneficiary. All names should be enriched and all names should go through the matching process.</p>
Match review >30	<p>Have all possible matches generated by the computer and allocated a match score in excess of 30 been reviewed by the claims processing team?</p> <p>Risk addressed: A score above 30 is a partial match and should be manually investigated.</p>
Second match review	<p>Has a second claims processor reviewed all of the potential matches? Where there is a disagreement on whether to investigate the match further (first says yes second says no) has the team leader made the final decision?</p> <p>Risk addressed: The second reviewer reduces the risk of human error resulting in a potential match being rejected. If the second reviewer believes a match should not be investigated but the first reviewer thinks it should then the decision to investigate should be escalated to a team leader.</p>
Water Copy requested	<p>Where a likely match exists has a Water Copy been requested and filed?</p> <p>Risk addressed: The Water Copy of the policy often provides additional information such as the occupation of the policy holder that enables a more accurate matching decision to be made. It also reduces the risk of</p>

	a transcription error in for example name or date of birth by Generali resulting in a match being rejected.
Report completed	<p>For all but unnamed and unmatched claims has a trustee report been completed? Does it show the reason for non-payment/payment and the calculation and beneficiaries as applicable?</p> <p>Risk addressed: The trustees provide an additional quality check but it can only be effective if all the relevant information is presented to them in the form of the internal report.</p>
Sign-off Team Leader	<p>Has the Team Leader confirmed the decision on the file?</p> <p>Risk addressed: The Team Leader sign-off provides the first quality check on the claim, reducing the chance of an incorrect offer.</p>
Sign-off Trustees	<p>Have two trustees signed-off on the decision?</p> <p>Risk addressed: The Trustee sign-off provides an additional quality check on the claim, reducing the chance of an incorrect offer.</p>
Finance paid	<p>Has the payment been made by finance?</p> <p>Risk addressed: That the correct amount has not been paid.</p>
Letter sent to claimant	<p>Has the final letter been sent to the claimant explaining the decision?</p> <p>Risk addressed: The letter sets out the details of all matched policies, their status and the calculation where an offer is made. It gives the claimant the chance to raise any concerns or to appeal the decision.</p>

Appendix 3: Stage 2 Compliance Tests

The following tests were carried out on the Stage 2 No-Match sample. The tests all have the answers *yes*, *no* or *n/a*. The answer *no* represents an issue. Each issue was categorised, as described in appendix 4, as either a control or substantive failure.

Test	Test Description
Review claim form	<p>Have all names been captured correctly by CLMS and included in the search by GTF?</p> <p>Risk addressed: There is a risk that not all names will have been captured by CLMS or are incorrectly transcribed which may result in a match not being identified when it should have been.</p>
Review matching	<p>Review all potential matches. Have any potential matches that seem reasonable been followed up?</p> <p>Risk addressed: Due to human error a likely match may not have been investigated.</p>
Check Letter	<p>For named claims check the letter that has been issued to the claimant explains that no match has been found and that they have a right to appeal.</p> <p>Risk addressed: Gives the claimant the opportunity to appeal the decision.</p>
Trustee sign-off	<p>Have two trustees signed-off on the decision?</p> <p>Risk addressed: The Trustee sign-off provides an additional quality check on the claim.</p>

The following tests were carried out on the Stage 2 Complete sample. The tests, except for the comparison of offer amount, which has a monetary value for the difference, all have the answers *yes*, *no* or *n/a*. The answer *no* represents an issue. Each issue was categorised, as described in appendix 4, as either a control or substantive failure.

Test	Test Description
Calculation data	<p>Does the data used in the calculation match the working paper record? (Country, amount, currency and dates).</p> <p>Risk addressed: An error in the sourced data is likely to have a material effect on the calculation.</p>
Calculation	<p>Re-calculate the offer and compare it to the offer made. Investigate any difference.</p> <p>Risk addressed: Identify both human and systematic errors in the calculation.</p>
Check loans	<p>Have loans been deducted during the holocaust period? If so has a top up been paid?</p> <p>Risk addressed: The ICHEIC guidance on loans changed during the claims processing period. As a result some loans were deducted from the base amount which should not have been. This test first identifies if loans were incorrectly deducted and if they were looks to find a subsequent top-up payment.</p>
Other policies	<p>Have all relevant policies been paid? If the search brought up other policies have all been checked?</p> <p>Risk addressed: That policies have been overlooked in the offer/matching process.</p>
Check distribution	<p>Check that the distribution is in accordance with the guidance. If the distribution does not follow the applicable law look for evidence of a will/court ruling that justifies the difference. If on the claim form the claimant states he is the only beneficiary but GTF have paid other people - is there evidence on the file (such as a will) to support this?</p> <p>Risk addressed: That the value of the policies has been incorrectly distributed.</p>

Verify No-payments	<p>If no-payment has been made check the working papers for the reason. Is it accordance with the rules?</p> <p>Risk addressed: That a policy has been incorrectly treated as not payable.</p>
Letter sent to claimant	<p>Has the final letter been sent to the claimant explaining the decision?</p> <p>Risk addressed: The letter sets out the details of all matched policies, their status and the calculation where an offer is made. It gives the claimant the chance to raise any concerns or to appeal the decision.</p>
Trustee sign-off	<p>Have two trustees signed-off on the decision?</p> <p>Risk addressed: The Trustee sign-off provides an additional quality check on the claim.</p>

Appendix 4: Detailed Findings

The following tables present our detailed results. The observations are categorised as follows:

- Compliance failure – the failure to operate a GTF prescribed control.
- Substantive failure – a failure that could or has led to an incorrect outcome such as an under/over payment or a potentially valid policy being ignored in the processing of a claim.

Our results are presented in three tables. One for each type of testing that we carried out.

Stage 1 – Controls Testing

The table below summarises the issues we identified through our Stage 1 testing – the testing of the effectiveness of GTF’s controls. We performed our tests on a sample of 123 claim files.

	Number of issues	Control failure	Substantive failure
There is no evidence of the matching process on the computer but matching has been done and 2 of the claims paid.	2	X	-
In the letter the "right of appeal" is missing	27	X	-
The same person carried out both the first and second matching checks.	2	X	-
First match concluded Yes, second concluded No for further investigation. No third decision, by the team leader, is documented.	2	X	-
Match score is >50 therefore a Water Copy should have been requested but wasn't.	12	-	X
The decision letter to the claimant was not sent (named claim)	1	-	X
	46	33	13

In total 46 issues were identified. Of these 13 have been classified as substantive failures. 12 of these substantive failures arise from the matching process and one from the reporting process.

Substantive Failures

For the 12 matching failures the computer generated matching score exceeded 50 and therefore, per our understanding of GTF's guidance, a copy of the policy document (known as a Water Copy) should have been requested from Generali to improve the accuracy of the matching investigation. Failure to obtain and use the Water Copy in the matching process could lead to the failure to identify a match and therefore to a claim being incorrectly rejected as a "No Match". These errors have been classified as a substantive error because they could potentially lead to a valid match not being identified.

We have tested against the process documented and described to us. GTF have stated that the process they have followed, in processing the claims, is not as we have understood it and is consistent with page 11 and slide 8 and 15 of "The Matching Process Practice and Procedures of the Fund". We believe that standard 5 has not been complied with in the aspect that the documentation is not sufficiently clear to define the process without ambiguity. We believe, as described above, that there is a risk of failure to identify a match if the process, as we have understood it, is not followed.

The substantive reporting error related to a claim in which Generali was named as the insurer (a "Named" claim) but a decision letter was not sent to the claimant upon the conclusion of GTF's investigations. This effectively deprives the claimant of his right of appeal. The original classification error was made by CLMS but was not detected by GTF's during its processing of the claim.

Compliance Failures

Of the 33 compliance failures 27 relate to the omission, in the decision letter to the claimant, of the notification and details of the right of appeal. We view this as a significant failure that needs to be rectified. We recognise that the appeals process started at the end of 2001 in accordance with the implementation agreement and that the GTF Guide to claimants, first published in October 2001, describes the right of appeal. The decision letters issued up until July 2003 did not include a "right of appeal" paragraph. Following discussions with ICHEIC in July 2003 the right of appeal was included in all subsequent letters that we examined.

The remaining six control failures are unlikely to have influenced the final outcome and include failures to gain/record signatures or the failure to apply the control in respect of having two different people review all of the potential matches and to require a third team leader decision if the two match reviewers disagree with each other on the investigation of a claim.

GTF explained that it was not part of their procedure to document the third (team leader) decision when two team members disagreed on the decision to further investigate a possible match. They therefore argue that these are not control failures. We observe that the failure to document the decision process fails the requirement of standard 5 to document all matters in the claim file/system that relate to the decisions reached.

Stage 2 – No-Match Testing

The table below summarises the 80 issues we identified through our Stage 2 testing of 304 “No-Match” claim files.

	Number of issues	Control failure	Substantive failure
In the letter the "right of appeal" is missing	20		-
The same person carried out both the first and second matching checks.	6		-
First match concluded Yes, second concluded No for further investigation. No third decision, by the team leader, is documented.	13		-
Match score is >50 therefore a Water Copy should have been requested but wasn't.	39	-	
The decision letter to the claimant was not sent (named claim)	2	-	
	80	39	41

Substantive Failures

In 39 claims a Water Copy was not used in the matching process even though the match score exceeded 50. For all 39 claims there is an increased risk that a potential match will have been rejected without sufficient investigation.

In two Named claims out of our sample no decision letter has been issued to the claimant. The claimant is therefore not aware of the outcome or their right of appeal.

Compliance Failures

20 of the compliance failures relate to the omission, in the decision letter to the claimant, of the notification and details of the right of appeal. We view this as a significant failure that needs to be rectified. All 20 failures relate to decision letters issued prior to July 2003 and the discussions with ICHEIC which led to the inclusion of a “right to appeal” paragraph in the decision letters used by GTF.

The remaining 19 control failures are unlikely to have influenced the final outcome and include failures to apply the control in respect of having two different people review all of the potential matches (six) and to require a third, team leader, decision if the two match reviewers disagree with each other on the investigation of a claim (13 claims). As noted in the control section testing GTF would argue that some of these were not control failures but our failure to understand the processes and the way in which they have changed over time. We would argue that these fail the requirement of standard 5 to document the processes used and to maintain evidence of their operation.

We found some instances where the country of the policy holder was the same as the potential match record but the country match had not been taken into account in the

scoring of the match. This could increase the chance of a match, with high potential for success, not being investigated. However, we did not identify a substantive failure, in our sample, as a result of this failure in the automated matching process.

Stage 2 – Paid and Not Payable Testing

The table below summarises the 130 issues we identified through our Stage 2 testing of 292 paid and not payable claim files.

	Number Of issues	Control failure	Substantive failure
In the letter the "right of appeal" is missing	98		-
No trustee signoff	2		-
(++) Loans were deducted from the base value even though they were issued in the Holocaust era	5	-	
(**) The trustee did not sign for the top-up payment	3		-
(++) GTF calculated the policy as if premiums were paid until 1944 instead of 1945	1	-	
(**) A bonus payment, provided for in the policy, was not paid even though the insured survived the maturity date of the policy	4	-	
Calculation factor is higher in GTF (67.71 as oppose to 63.4 in Deloitte calculation)	1	-	
(**) The trustee did not sign the revised internal report (which was just a memo).	1		-
(++) Paid \$2000 but should have paid the \$4000 minimum for W. Europe survivors.	1	-	
Amount was paid twice to one of the claimants	2	-	
Policy was reduced for n.p.p of one quarter in 1945. As a result a potential bonus wasn't paid. This should have been paid.	1	-	
Claim 72141 was originally denied because there was no stati fine in 36. Trustee didn't accept the denial and a decision to pay was made by Meir Shamgar, who based his decision on par. 21f in the 'GTF guide for claimant'.	1	-	
In the second payment (out of three) of \$790 there is no offer and/or trustee signatures.	1		-
In the GTF calculation the wrong year was entered this total was used in the letter and paid but the letter text for the method of calculation is correct. Human error rather than systematic error.	1	-	
A third policy was transferred from Generali to GTF for review. The claimant was informed of the transfer but not of the decision.	1	-	
Policies that considered to have started retroactively, were taken in the calculation as if they started at the issuance date. Payments are assumed to stop in 45. Unlikely to have stopped until 48 (prison).	1	-	
(++) GTF did not allow the second 1/2 of 1945's premiums in its calculation.	1	-	
After completion of the final report (including trustees' signatures), team leader found another heir. She corrected the report manually and didn't re-issue a new report. There are no new signatures on the corrected version.	1		-

A Generali policy was listed on a bank statement belonging to the policy holder but no evidence of it being followed up. 3 other policies were completed.	1	-	
Some of the policies for this file have annuity payments - the treatment of these was not raised with ICHEIC for further guidance. In this particular case the beneficiary survived until 1994 and the annuity value is likely to exceed the base policy value.	1	-	
This file has several errors and some questions as to treatment. It was subject to a recheck and these errors were not discovered or commented upon.	1		-
A policy was transferred from Generali to GTF for processing and was added to an existing claim file which was closed without the policy being processed. The policy was not payable.	1		-
	130	108	22

For the cases marked “**” GTF agrees to the facts of the case but not the conclusion that we have drawn. For the bonuses, GTF believe that because some payments were missed by the policyholder (in the holocaust period) that the bonus is not payable. For the other cases marked above GTF believe that trustee sign-off is not required. We would argue that the cases where trustee signature is and is not required are not documented and as trustee sign-off is required for no-match claims and “normal” payments it should be required where there is a change in disposition and for top-up payments.

For the 8 cases marked “++” the claims were correctly processed at the time of original decision but subsequent rule changes and clarifications mean that the amount paid was incorrect. For 5 the loan cases the relevant change took place in November 2002, for the minimum payment to Western Europe the change took place in December 2003 and for the last 2 cases the clarification that premiums were to be deemed to have been paid until the end of 1945 took place in November 2002. We understand that the fund had planned and was in the processes or reviewing its payments for a potential top-up. Given the total number of claims paid was about 2000 we can not understand why these files have still not been rectified given the significant passage of time.

Substantive Failures

The 22 substantive failures are largely individual in nature and are documented in the table above. The types of error include incorrect calculations, failure to pay bonuses, double payments to some or all claimants and failure to follow up likely matches/policies.

Whilst it was not material to any of the claims we found that the wrong interest rate was applied in most calculations for the year 2001. GTF use the factor 5.44 where as the ICHEIC guidance provides for 5.40.

Compliance Failures

98 of the compliance failures relate to the omission, in the decision letter to the claimant, of the notification and details of the right of appeal. We view this as a

significant failure that needs to be rectified. All 98 failures relate to decision letters issued prior to July 2003 and the discussions with ICHEIC which led to the inclusion of a “right to appeal” paragraph in the decision letters used by GTF.

Failures to gain/record the required signatures account for nine of the remaining compliance failures. One failure relates to not sending a letter to a claimant to inform them of the final decision in respect of a particular policy. The last of the control failings related to the quality of the review process itself. One of the claims, which had several substantive errors, was subject to a recheck by GTF following the original team leader and peer review. Despite all of these checks the substantive failures were not identified.