



CONFIDENTIAL

Group Internal Audit Report

Ref: 2018/Q1/LSD/ALOR/E/AR/001

Issued to: Business Owners (See Distribution) & BRCC

Audit Title:	Area Legal Offices Review
Business Unit:	Legal Services Department
MANCO Member:	Adesola Adeduntan – MD/CEO, First Bank of Nigeria & Subsidiaries
Business Owner:	Raymond Mgbeokwere – General Counsel
Audit Period:	01/05/2016 to 31/12/2017
Audit Date:	29/01/2018 to 30/03/2018
Audit Type:	Standard

Table of Contents

Section	Details	Page
1	Executive Summary	3
1.1	Introduction and Scope	3-4
1.2	Audit Rating	4
1.3	Summary of Observations	5
2.1 – 2.5	Detailed Findings	7-22

1. Executive Summary

1.1 Introduction and Scope.

Legal Services department is responsible for provision of legal services and advice to the bank and its subsidiaries on matters of law and ensuring legal protection against losses attributable to business risks. Since banking business is heavily regulated by law, all services rendered by the bank and all its operations, transactions and business development have legal implications. The department provides legal advice and guidance, support prosecution of cases in Courts, manages litigation and prepares/vets legal agreements documentation, preparation and drafting among others.

To ensure prompt and efficient services to branches nationwide, the department has Area Legal Offices in six (6) locations namely Port Harcourt, Enugu, Benin, Abuja, Kaduna and Ibadan; under the supervision of Unit Heads, Efficiency Optimisation & HUB Coordination (South & North). Each of the Area Legal Offices attends to legal issues emanating from branches/SBUs within the areas of their coverage.

The audit focused on evaluation of the quality and efficiency of legal services being provided at the Area Legal Offices.

1.1.1 Objectives

- Assess the adequacy of supervisory control and co-ordination of the Area Legal Offices.
- Evaluate the quality and adequacy of legal representations for the bank and mechanism for tracking on-going litigations.
- Confirm the adequacy of the Bank's litigation management strategy and its alignment with the Bank's overall Risk Management framework
- Assess the timeliness in handling perfection of the bank's securities/title documents.
- Review timeliness in handling requests from clients/customers and internal stakeholders.
- Ascertain the level of compliance with internal control policies and statutory/regulatory guidelines.

1.1.2 Scope of Work

The audit covered the following areas:

- Searches and Verification of Documents – Conducting Searches/Verification on Title Deeds, Probate Instruments and Incorporation Documents.
- Security, Documentation & Management – Preparation of Mortgage deeds/Loan Agreements/Other basic Agreements, Confirmation of Adequacy and Perfection/Up-stamping of security documents, Termination of ongoing perfection and Preparation of Deeds of release.
- Litigation – Litigation & Negotiation (Against the Bank), Litigation & Negotiation (Suits by the Bank) and Handling of Garnishee/Mareva Orders.
- Handling Customer Complaints.
- Expense review (Compliance with expenses policy and approval limits).

1.2 Audit Rating

Previous Rating: – Medium Risk (79%).

The Audit Rating – Low Risk (85.04%).

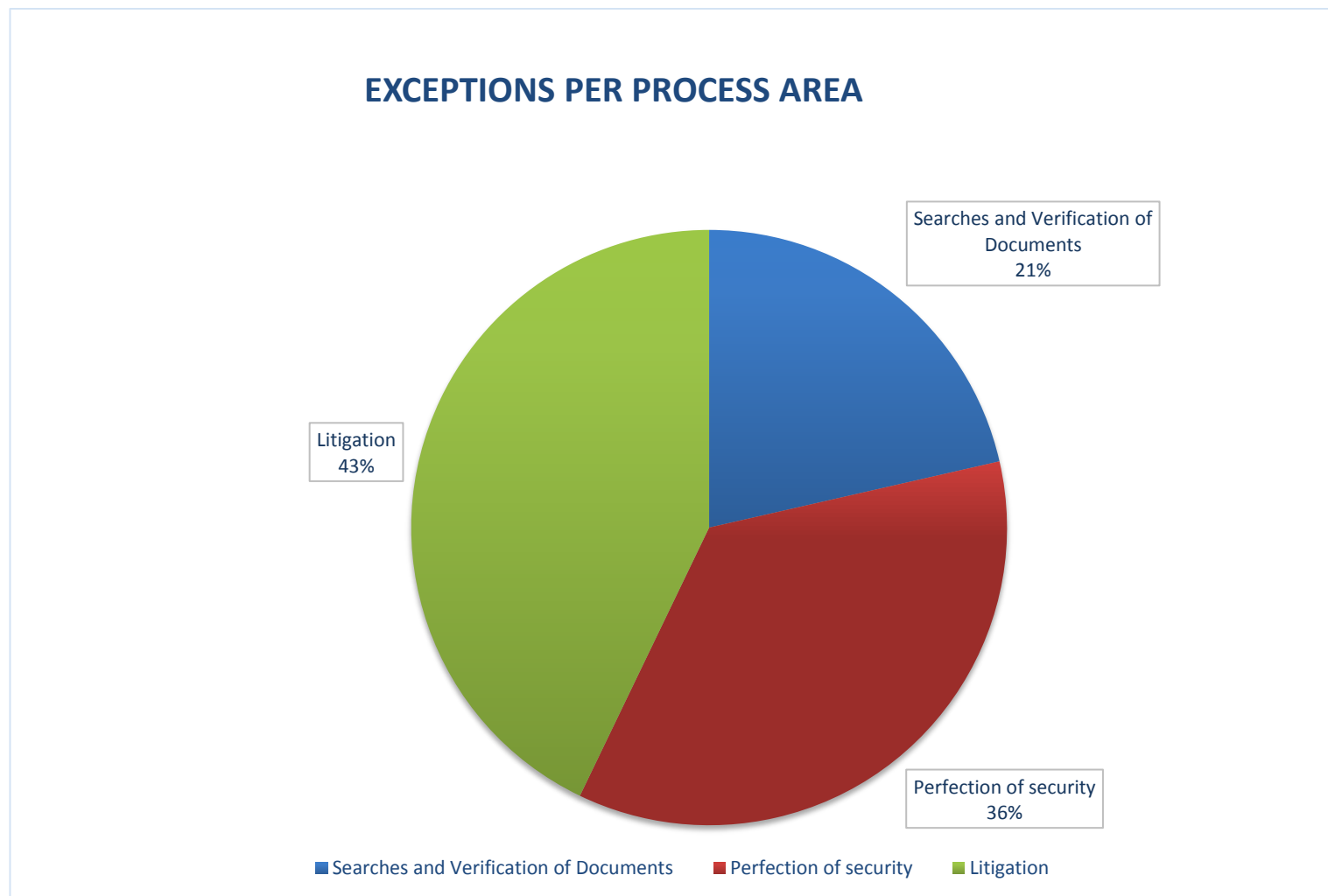
Audit Areas	Score (%)	Risk Class	Total	Open	Closed
Searches and Verification of Documents	80.50.	Medium	1	1	0
Security, Documentation and Management	87.43	Low	3	2	1
Litigation and Negotiation	83.33	Medium	4	3	1
Hub Coordination – Head Office	88.89	Low	2	2	0
Process Improvement	NA	Process Improvement	2	2	0
Total	85.04	Low	12	10	2

The key themes noted by the review are set out in section 1.3 below while the detailed findings are in section 2 of the report.

1.3 Summary of Observations

- i. **Perfection of Security Documents** –Perfection exercise on credit facilities granted in branches under the six (6) Area Legal Offices between 2007 and 2014 for seven (7) customers, six (6) Active members of staff and fourteen (14) Exited staff members with total outstanding balances of N97.93million, N63.44million and N91.92million respectively are yet to commence. There is need to engage the Relationship Teams and branches involved to resolve the documentation challenges.
- ii. **Enlisting/Delisting of External Solicitors** - There is no documented procedure that states the criteria, guidelines and approving authority for enlisting and delisting of External Solicitors engaged to provide Legal Services for the Bank. Currently, the General Counsel as well as Area Legal Managers enlist External Solicitors. Also, terms and conditions of services such as Turn-Around-Time (TAT), dispute resolution and delisting/disengagement clauses are not stated in the offer letters reviewed.
- iii. **Documents Management** - Ibadan Area Legal Office does not have fireproof cabinets for safe-keeping of their various files. All the files are kept on racks in the filing room. Also, there are inadequate fire proof filing cabinets for preservation and safety over files in the Enugu Area Legal Office. Some files were kept loosely on top of the available cabinets that were already filled up and are therefore prone to unauthorized access.
- iv. **Monitoring Customer Complaints Status** – Resolution of customer complaints could not be established in some instances. At times after the issuance of holding responses to customers' solicitors for cases that need to be investigated, follow-up is not being done on the respective branches/Internal Audit Unit until the solicitors send reminders. There is need to streamline the process of monitoring the status of customer complaints and ensure prompt resolution.

1.4 Pictorial Representation of Exceptions per Process Area of Area Legal Offices



2. Detailed

Findings

Ref	2.1	SEARCHES AND VERIFICATION OF DOCUMENTS	Rating	Medium
-----	-----	--	--------	--------

Ref	2.1.1	Searches and Verification of Documents
Finding: Poor handling of requests on searches and verification of documents bordering on inadequate tracking and delay were noted as follows:		
Area Offices	Findings	
Port Harcourt	Corporate search for Dimastar Enterprises received from Aba Ariaria branch on 17/11/2017 was not reviewed and assigned to an external solicitor until 06/12/2017; a time lag of 19 days.	
Benin	Corporate search on Maromen Construction Concepts Ltd was assigned to a Solicitor on 25/05/2016 and the search report was not forwarded to the branch until 05/02/2018 at the instance of the audit team.	
	Probate Search request confirming the letter of administration for Mrs. Osarugue Obasogie (deceased customer) from Ogwashi Uku Branch was received from the branch on July 10, 2017 but was not assigned to a solicitor until a reminder was sent on July 24, 2017 before the request was treated.	
	Search on probate and property search requests on the accounts of Ogiemwonyi Godwin Nig. Enterprises and Oshevire Godwin; Requests were made by the branch on 04/08/2017 and 12/12/2017 while the Area Legal Office assigned the requests to a solicitor on 28/08/2017 and 25/01/2018 respectively as a result of reminders sent by the branch.	

Management Response: The omission is regretted. Although, the delay in conduct of search in Ogiemwon was caused by the Branch's failure to provide the required statutory fee. However, we are putting in place a process of spot checking the searches conducted by our legal officers to avoid future re-occurrence.		
Impact: Reputational Issue and customer dissatisfaction		
Root cause: i) Failure of the instructing branch to follow process. ii) Inadvertent omission due to volume of work.	Recommendation Head, Efficiency Optimisation & HUB Coordination should design a process for tracking requests from branches (e.g., a Workflow) to ensure compliance with Turn-Around-Time.	Status/Action Date Open: 30/04/2018
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination		

Ref	2.2	SECURITY , DOCUMENTATION AND MANAGEMENT	Rating	Low
-----	-----	---	--------	-----

Ref	2.2.1	Perfection of Security Documents
Finding: i) During the review of Perfection/Up-stamping of various security documents in the monthly returns of Area Legal Offices as at 31/01/2018, it was observed that some securities were categorized as 'Perfection Not Yet Commenced'. Further analysis of the schedule depicts the following: <ul style="list-style-type: none"> Perfection of security documents for two (2) customers are still ongoing on facilities availed between 2010 and 2015 while those of 		

seven (7) Staff members on active service are also ongoing on facilities availed from 2008 to 2012

- Perfection exercise for seven (7) customers with total outstanding balance of N97.93million, six (6) Active members of staff with outstanding balance of N63.44million and fourteen (14) Exited staff members with outstanding balance of N91.92million are Yet to Commence on facilities granted in branches under the six (6) Area Legal Offices from 2007 to 2014.

Customers Category	Years Facilities Availed	Facility Balances as @ 06/03/2018 N	No of Customers	Perfection Status	%
Customers	2010 - 2015	44,525,713.77	2	Ongoing	13.02
Customers	2007 - 2014	97,931,045.10	7	Yet to Commence	28.64
Active Staff	2008 - 2012	44,095,738.08	7	Ongoing	12.90
Active Staff	2008 - 2014	63,437,675.70	6	Yet to Commence	18.55
Exited Staff	2008 - 2013	91,915,455.05	14	Yet to Commence	26.88
Total		341,905,627.70	36		100

ii) The Master List of Perfection Status maintained at the Head Office is not comprehensive. Validation of security perfection status in the monthly returns from Area Legal Services with the Master List maintained at the Head revealed that details on the perfection of about seventeen (17) customers across four (4) Hubs (namely Port Harcourt, Enugu, Ibadan and Kaduna) were not included in the list

Management Response:

i) The information taken from the Portal did not actually show the true position or update on the mortgages. The information were inputted when the perfection were commenced. Most of these perfections had been concluded and they were not updated to reflect this position. The error is regretted. We have instructed the Legal Officers to ensure regular update on all perfections. Some of the perfections are still ongoing. Few of the perfections are stalled because the documents provided at the inception of the perfection became stale before the

<p>stage where such documents are to be used and the customers have refused to provide new documents for the exercise.</p> <p>ii) Your observation is noted and we regret the omission. We are ensuring the inclusion of all omitted perfection in the Master list of Perfected Mortgages on Portal.</p>		
<p>Impact:</p> <p>i) Financial loss due to provisioning/write off in case of default and foreclosure challenges</p> <p>ii) Non reliability of information for decision making</p>		
<p>Root cause:</p> <p>i) Non provision/renewed of documents necessary for perfection.</p> <p>ii) Availment of loans based on inchoate titles issued by the Government.</p> <p>iii) Exiting of staff before the required documents are provided.</p> <p>iv) Inadvertent omission</p>	<p>Recommendation</p> <p>i) Most of the security documents have not been perfected as claimed. Head, Efficiency Optimisation & HUB Coordination should ensure that the respective Relationship teams/branches are engaged (especially for those that are Yet to Commence) to sort out the documentation issues. Unresolved issues should be escalated to Credit Risk Management department for consideration.</p> <p>ii) The Master list should be updated to make the document useful for decision making.</p>	<p>Status/Action Date</p> <p>Open: 30/09/2018</p>
<p>Action Owner:</p> <p>Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination</p>		

Ref	2.2.2	Unutilized Bank Cheques kept in Customer Files
-----	-------	--

Finding:

Seven (7) unutilized bank cheques with a total value of N43,160.00 (Forty-three thousand, one hundred and sixty naira) meant for perfection/upstamping of security documents were found in customers' files at Ibadan Area Legal Office instead of repurchasing same to refund respective customers after conclusion of perfection exercise. Some of the customers have liquidated their facilities and Deed of Release processed for their security documents:

S/N	Customers	Branch	Bank Cheque Details	Amount N
1	Metrovert Consultation Limited	Ado Ekiti	Bank cheque No. 19223352 dated 07/07/2010 issued in favour of Federal Government	9,400.00
2	Shaktar Global Investment Limited	Erin Osun	Bank cheque No. 00848179 dated 22/06/2010 issued in favour of WTH Tax (Federal)	9,400.00
3	Samuel Babalola	Ile Ife	Bank cheque No. 73292302 dated 30/11/2009 issued in favour of Federal Government WTH Tax	7,500.00
4	Adebayo Bobade	Akure Main	Bank cheque No. 70987328 dated 25/03/2010 issued in favour of Ondo State Government	1,650.00
5	Odusab Ventures	Molete	Bank cheque No. 00834735 dated 12/10/2009 issued in favour of Oyo State Government (WHT Tax)	8,500.00
6	Jimsad Global Services Limited	Saki	Bank cheque No. 01740206 dated 05/11/2012 issued in favour of Federal Government WTH Tax	2,550.00
7	Solomon Wada	Ibadan Main	Bank cheque no 3671017 dated 10/10/2013 in favour of FIRS-WTH Tax	4,160.00
	Total			43,160.00

Management Response:

We have noted this and regret the error. We have returned the Cheques to the various branches concerned for their necessary action. Area Legal Managers have been advised to always return unutilized cheques promptly

Impact:

i) Loss of Instruments and possible fraudulent conversion ii) Negative brand image		
Root cause: Inadvertence omission	Recommendation Head, Efficiency Optimisation & HUB Coordination should ensure that all the cheques are credited into the respective customers' accounts. Subsequently, any unutilised cheque should be credited into the respective customer's account upon completion or termination of perfection exercise.	Status/Action Date Open: 30/04/2018
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination		

Ref	2.2.3	Handling of Perfection Documents
Finding: The documents submitted to solicitors for the purpose of perfection were not properly handled in the following instances:		
Customers	Area Offices	Findings
Justice Abumchy Investment Ltd – Aba Alaoji	Port Harcourt	Original copy of Tripartite Legal Mortgage, letter of up-stamping of security from N9.1m to N13m and Bank cheque of N48,750.00 for statutory fees were lost by the solicitor (Ozigbu & associates) handling the perfection in September 2015. The issue was not escalated and up-stamping was abandoned throughout the duration of the facility. It was later completed when there was need for a further up-stamping of the security to N19m in August 2016 after the customer's facility was renewed and enhanced to N15m.
Nalin Paints Ltd –	Enugu	Perfection commenced in 2010 with Okida Akaah as solicitor but was not concluded as the

Enugu Main		solicitor misplaced the security documents and this stalled the perfection. In 2016, the perfection was assigned to another solicitor (Umezuruike & Co) upon roll over of the customer's N7m facility and is now awaiting registration at CAC as at audit date	
Management Response: Port Harcourt The car belonging to the Solicitors briefed to handle the upstamping was burgled and the bag containing documents including the photocopy of the extant Mortgage (the original Mortgage is not required for upstamping in Port Harcourt) were carted away. The upstamping was subsequently done. Enugu The Solicitors instructed took ill and a new Solicitor was appointed. The Mortgage has been perfected now and being registered with the Corporate Affairs Commission (CAC).			
Impact: Inability to conclude perfection may lead to financial loss in case of default.			
Root cause: Unforeseen Incidence	Recommendation Head, Efficiency Optimisation & HUB Coordination should ensure that issues of lost/misplacement of customer's security documents are always escalated to General Counsel for prompt remedial action.	Status/Action Date Closed	
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination			

Ref	2.3	LITIGATION AND NEGOTIATION	Rating	Medium
-----	-----	----------------------------	--------	--------

Ref	2.3.1	Enlisting/Delisting of External Solicitors	
Finding: There is no documented procedure highlighting the criteria, guidelines and approving authority for enlisting and delisting of External Solicitors to provide Legal Services for the Bank. Currently, the General Counsel as well as Area Legal Managers enlists External Solicitors. Also, terms and conditions of services such as Turn-Around-Time (TAT), dispute resolution and delisting/disengagement clauses were not stated in the offer letters reviewed.			
Management Response: All Solicitors enlisted by the department are well profiled based on their track records and integrity. They are interviewed and recommended by the Area Managers for the approval of the HOD. After approval, the Solicitors are listed. TAT on litigation matters cannot really be set as the progress is dependent on the presiding judge and the Court. These are outside the control of both the Bank or the Solicitors appointed. Although terms and condition of engagement of our lawyers are usually contained in their letter of instruction. Dispute resolution is statutory. We however are in in the process of formalising our processes with regards to these.			
Impact: i) Likelihood of hiring of incompetent Solicitors due to absence of defined selection criteria ii) Reputational issue resulting from unresolved disputes			
Root cause: Inadvertent omission		Recommendation The department should ensure that the process of enlisting and delisting of External Solicitors is formalized / documented and included in the department’s Standard Operating Procedure.	Status/Action Date Open: 30/06/2018
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination			

Ref	2.3.2	Engagement of Unlisted Solicitors
-----	-------	-----------------------------------

Finding:

i) The following Solicitors who handled various cases at the Area Legal Offices were not included in the consolidated list of approved External Solicitors maintained at the Head Office:

S/N	List of Solicitors Not on the Approved List
	Ibadan
1	Jaiyeola Ogunnaike & Co
2	M.O Oladejo & Co
3	Adewale Afolabi & Co
4	Wuyi Adeyemo & Co.
5	Adeyemi Adediji & Co
6	Osaretin Giwa - Osagie & Co.
7	Oasis Solicitors & Attorneys
8	Enos Jacob & Co.
	Abuja
9	Ademola & Ademola
	PH
10	Wigs & Bibs
11	Testel Law Consult
	Kaduna
12	E.N.Emenalo & Co
13	Amana Chambers
14	J.B. Daudu & Co

ii) The Bank's approved solicitors list is not yet hosted on the department's portal for easy access by staff

Management Response:

Your observation on the omission of some names of the Solicitors in the regions from the comprehensive approved Solicitors list in H/O is well noted. We shall ensure that the omitted names are added to the H/O list immediately		
Impact: i) Use of unapproved solicitors ii) Loss of Audit Trail iii) Inaccessibility of the list to users		
Root cause: Inadvertent omission	Recommendation Head, Efficiency Optimisation & HUB Coordination should ensure that approved list of Solicitors is updated and hosted on the department's portal.	Status/Action Date Open: 30/04/2018
Action Owner: Olusuyi Bello- Head, Efficiency Optimisation & HUB Coordination		

Ref	2.3.3	Professional Fees
Finding: Port Harcourt i) Professional fee of N50,000.00 was paid to a solicitor (Nsemeke Akpan & Associates) that represented the Bank on the garnishee order involving OBONGANWAN DORA EBONG & ANOR VS AIRTEL NIGERIA LIMITED & FBN PLC (HU/MISC.119/2017) above the N35,000.00 approval limit for Garnishee by Area Legal Officers. ii) N10,000.00 and N11,200.00 were paid on up-stamping of N700,000.00 and N750,000.00 for Xeus Nigeria Ltd and Calitus Kalu Okoro instead of N6, 720.00 and N6, 780.00 respectively. iii) The sum of N78,000.00 was paid as professional fee on perfection of LM on behalf of B.U.Chima & Sons Ltd without approval from		

General Counsel.

Management Response:

- i) We regret this. The decision on the upper limit of fee of N50,000 payable on garnishee matters was taken at the Departmental level in November 2016. The Manager did not wait for the HOD's memo on it before executing the decision. We have accordingly advised all legal Managers to always await communication from the HOD before implementing decisions.
- ii) We pay full fee on perfections with consideration lower than N1Million. The Legal Manager paid the sum of N10,000.00 and N11,200.00 based on this process.
- iii) The payment of the N78, 000.00 was done out of misinterpretation of the process by the legal officer who thought only payment for a concluded perfections are approved by the Head Office. The payment was for a truncated perfection for which the solicitors are paid on quantum meruit. Legal Managers have been advised on the requirement of the HOD's approval before such payment is made.

Impact:

Financial Loss due to over invoicing

Root cause:

Misinterpretation of approval process

Recommendation

Head, Efficiency Optimisation & HUB Coordination should ensure that approved process for professional fees payment is complied with.

Status/Action Date

Open: 30/04/2018

Action Owner:

Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination

Ref	2.3.4	Garnishee / Mareva Orders	
Finding: Garnishee Order Nisi in respect of Suit No. KDH/KAF/223/2015 - Alhaji Ado Dandago Kano V. Suleiman was served on Kafanchan branch on 14/02/2017 seeking to attach the sum of N5,775,000.00 but was not forwarded to Kaduna Area Legal office for necessary action. Hence, the bank was not represented at the adjourned date and the Garnishee was made Absolute against the bank on 05/04/2017. This negligence on the part of the branch cost the bank the sum of N150,000.00 despite the fact that the judgment debtor does not maintain an account with the Bank.			
Management Response: The Department always educate the business on the danger of not sending Court processes promptly. The incidence like this is now rare. The Department continues to sensitize the Business in this regard.			
Impact: Financial Loss			
Root cause: Negligence		Recommendation The department should ensure continuous sensitization of branches on the importance of prompt treatment of Garnishee Orders.	Status/Action Date Closed
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination			

Ref	2.4	HUB COORDINATION – HEAD OFFICE	Rating	Low
-----	-----	--------------------------------	--------	-----

Ref	2.4.1	Documents Management		
Finding: i) Ibadan Area Legal Office does not have fireproof cabinets for safe-keeping of their various files. All the files are kept on racks in the filing room. Also, there are many old and obsolete items in the filling room which needs to be moved to archives. ii) Fire proof filing cabinets for preservation and safety over files in the Enugu Area Legal Office are inadequate. While the available cabinets are filled up; some files are kept loosely on top of the cabinets and prone to unauthorized access.				
Management Response: Noted for Compliance. In the interim, the Legal Managers concerned had been instructed to fix the cabinets to useable and manageable level before the cabinets are replaced for them.				
Impact: (i) Potential loss through unauthorised access to important information/documents (ii) Loss of Audit Trail				
Root cause: Failure to report the issue to Head Office creating budget constraint		Recommendation The issue is not about repairs of cabinets. The department should make adequate cabinets available to the affected Area Legal Offices.		Status/Action Date Open: 30/09/2018
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination				

Ref	2.4.2	Standard Operating Procedure (SOP)	
Finding: i) There is no documented Turn-Around-Time (TAT) for all the processes handled by Legal Services department including the Areal Legal Offices to measure effectiveness and efficiency of their activities and the outsourced services such as searches & verification of documents, security, documentation & management and handling of customer complaints. ii) Area Legal Managers nominate and assign cases to External Solicitors. This is not in line with the department's SOP which vested the authority to nominate External Solicitors to undertake the Bank's defence on the HOD (i.e. the General Counsel).			
Management Response: i) The TAT of the Department is negotiated separately with our internal customers. ii) The Area Legal Managers are the HODs of their different Hubs and therefore profile Solicitors to handle their matters depending on the Solicitors track records, experience and the capacity or capability of such Solicitors to handle the matter on hand. Referrals are only made to Head Office when in their view a matter is complex or the Hub Coordinator picks same from mail or review for Head Office to handle. The SOP will be amended to reflect these.			
Impact: i) Inability to measure performance ii) Nomination of incompetent solicitor to handle cases			
Root cause: In line with the Departmental process although not yet included in the SOP of the Department		Recommendation The department should update the SOP with the Turn Around Time for their processes and appointment of External Solicitors for cases at Area Legal Offices level.	Status/Action Date Open: 30/09/2018
Action Owner: Olusuyi Bello- Head, Efficiency Optimisation & HUB Coordination			

Ref	2.5	PROCESS IMPROVEMENT ISSUES	Rating	Process Improvement
-----	-----	----------------------------	--------	---------------------

Ref	2.5.1	Customer Complaints Status
<p>Finding: There is need to streamline the process of monitoring the status of customer complaints. There are instances where the resolution of complaints could not be established. In some instances, after the issuance of holding responses to customers' solicitors for cases that need to be investigated, follow-up is not being done on the respective branches/Internal Audit until the solicitors send reminders</p> <p>Management Response: This is well noted. However, the Legal Services, Complaint Department and Internal Audit have now put in place a streamlined process of treating complaints in the Bank and we follow the process presently.</p> <p>Impact: Service failure may lead to avoidable litigation and financial loss</p>		
<p>Root cause: Absence of documented customer complaints process.</p>	<p>Recommendation Activities of Area Legal Services should be incorporated in the integrated customer complaints management framework to ensure effective complaints management.</p>	<p>Status/Action Date Open: 30/06/2018</p>
<p>Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination</p>		

Ref	2.5.2	Staff Vacancy - Port Harcourt Area Legal Office	
Finding: There is need for urgent recruitment/posting of an additional Legal Officer to Port Harcourt Area Legal Office to complement the existing staff strength. Activities carried out in the Area Office are in high volumes and staff members are already overwhelmed. The current situation is also affecting workflow at the Head Office due to rescue activities ongoing on behalf of this Area Office.			
Management Response: This is well noted. The department is working hard to do the needful on this issue.			
Impact: i) Service Failure ii) Financial Loss resulting from litigation			
Root cause: Increased volume of work.		Recommendation The department should deploy an additional Legal Officer to the PH Area Legal Office to strengthen the workforce and prevent possible service failure. Also, the Hub-coordinator should conduct a study tour of the area to ensure that they are operationally efficient.	Status/Action Date Open: 30/06/2018
Action Owner: Olusuyi Bello - Head, Efficiency Optimisation & HUB Coordination			

Issued by:



Uduak Nelson Udoh
Chief Audit Executive