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| Agenda Item No: | 10 |  |
| Committee: | Audit and Risk Management | |
| Date: | 26/09/2023 | |
| Report Title: | Risk Based Internal Audit Plan 2023/24 Revised | |

1 Purpose / Summary

In accordance with the Public Sector Internal Audit Standards (PSIAS) the Interim Internal Audit Manager has prepared a revised Internal Audit Plan following recommendations from the External Quality Assessment (EQA) in December 2022 and guidance from the Corporate Director & Chief Finance Officer and the Assistant Director of Legal & Governance.

2 Key issues

- The Council's Internal Audit work plan is produced on an annual basis and reviewed periodically. It is an estimate of the work that can be performed over the financial year and as such is subject to change. Potential areas of the Council for audit are prioritised based on a risk assessment, enabling the use of Internal Audit resources to be targeted at areas of emerging corporate importance and risk.
- The format of the Plan reflects the PSIAS which were introduced in April 2013. The PSIAS were revised and came into effect in April 2017. It also incorporates the governance and strategic management arrangements of Internal Audit resources.
- There are a total of 280 budgeted productive days for 2023/24.
 - 220 days are allocated to operational audit work. This resource is used to calculate the risk-based Audit Plan. This work contributes to the Annual Audit Opinion on the effectiveness of the system of internal control, which is reported to the Committee.
 - 60 days are allocated for other productive assurance work. This includes proactive anti-fraud and error work such as the National Fraud Initiative, project-based assurance, a contingency for responsive work and following up previous recommendations.
- The risk-based Plan assumes that the Internal Audit operational team comprises 1.6 FTE excluding the Interim Internal Audit Manager. There is a current vacancy for an Internal Auditor, without which the Audit Plan cannot be completed and would be insufficient to provide continued Internal Audit coverage of all key control systems / fundamental audits over a 3–5-year cycle.
- In the meantime, an interim Internal Auditor has been hired until the end of the financial year.
- The Plan will continue to be flexible to support ongoing and emerging risks that may arise throughout the year. However, the Interim Internal Audit Manager has

reviewed the Plan and has replaced some of the low-risk audits with higher, new or changing risks, subject to an ongoing risk evaluation, as well as altered the number of days to conduct each audit.

- The audit plan for 2023/24 is attached at Appendix A.
 - The Assurance rating classification is included at Appendix B.
 - The ‘fundamental / key systems’ audit reviews over the next 5 years are included at Appendix C.
- The Council has key financial systems, known as ‘Fundamental’ systems, due to their significance and materiality. Detailed testing provides assurance to the Council’s External Auditors in preparation for final accounts compliance. Following repeated years of positive assurance, the Committee and the External Auditors agreed an approach that would maximise assurance with the most effective use of resources. This approach will continue to be discussed with the External Auditors, reflecting any changes to the level of risk for these systems.
 - This is illustrated in Appendix C which shows that the auditing arrangements with ARP, the Council Tax, Business Rates and Housing Benefits are reviewed annually. The remaining key systems, primarily in Finance, will be audited over a three-year cycle.

3 Recommendations

The Committee is asked to acknowledge the Internal Audit resources and to consider and note the attached revised Internal Audit Plan for 2023/24.

| | |
|-------------------------------|--|
| Wards Affected | All |
| Forward Plan Reference | N/A |
| Portfolio Holder(s) | Cllr Chris Boden Leader and Finance Portfolio holder |
| Report Originator(s) | David Thacker - Interim Internal Audit Manager |
| Contact Officer(s) | Peter Catchpole – Corporate Director & Chief Finance Officer Amy Brown – Assistant Director of Legal & Governance |
| Background Paper(s) | Accounts and Audit Regulations 2015 Public Sector Internal Audit Standards 2016 CIPFA Local Government Application Note 2019 Fenland District Council Business Plan Internal Audit Charter |

Risk based Internal Audit Plan
2023/2024
Revised



1 Introduction

- 1.1 This document sets out the Internal Audit risk-based Plan. It is intended to demonstrate how Internal Audit will support the overall aims and objectives of the Council by:
- providing the Chief Executive, Section 151 Officer and Audit and Risk Management Committee with an overall opinion each year on the Council's control environment to support the Annual Governance Statement requirements.
 - preparing audit plans that give suitable priority to the Council's priorities and key risks and concentrate resources on areas that have been identified as being the most vulnerable.
 - providing suggested actions to line management at the conclusion of each piece of audit work that will assist in continuous service improvement and reduce the risks identified.
 - identifying the audit resources required to deliver an audit service that meets required professional standards; and
 - complying with professional standards.
- 1.2 The Plan is risk-based and covers the Council's existing operations, while adding value by responding to emerging risks and promoting good governance.
- 1.3 The Plan will be reviewed at least annually to ensure its continued relevance, both in terms of supporting the Council's aims and corporate objectives, and in achieving a professional, modern audit service.
- 1.4 The strategic aims for Internal Audit in 2023/24 are to:
- prepare, maintain and deliver the risk based Internal Audit Plan.
 - proactively promote understanding of risk and control.
 - recommend actions that help systems meet at least adequate levels of control.
 - facilitate provision of assurance for the Annual Governance Statement.
- 1.5 The Plan is supported by the teams Service Plan, which is aligned to the Council's Corporate Priorities, and is agreed with the Internal Audit team through the Council's Springboard process.

2 Role of Internal Audit

- 2.1 All local authorities must make proper provision for internal audit in line with the 1972 Local Government Act (S151) and the Accounts and Audit Regulations 2015. The latter states that authorities must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.
- 2.2 Fenland District Council has responsibility for ensuring that statutory Internal Audit arrangements are in place to the Corporate Director & Chief Finance Officer and the Assistant Director of Legal & Governance. These arrangements form a key element of the Council's framework for corporate governance.
- 2.3 The Interim Internal Audit Manager will oversee Internal Audit provision to the Council on behalf of the Corporate Director & Chief Finance Officer and Assistant Director of Legal & Governance.
- 2.4 The objectives, scope and definitions of Internal Audit are detailed in the Internal Audit Charter.

3 Risk assessment

3.1 The Council's Audit Plan is based on a risk assessment of all the Council's major systems and other auditable areas. This allows us to prioritise those areas and systems to be included within the plan. Key risk assessment factors include:

| <u>Factor</u> | <u>Description</u> |
|--|---|
| Materiality – Value | The value of annual direct income / expenditure associated with the system / activities |
| Materiality – Volume | An estimate of the number of transactions processed by the systems / activities per annum |
| Significance / Profile | The significance of the system to the activities of the Council. |
| Complexity | The complexity of the systems / activities in terms of their operation and auditability |
| Change | Recent changes to the system or the likelihood of change to the systems in the audit period planned |
| Regulatory / Contractual | Extent to which the system / activity is subject to regulation or contractual obligation |
| External Monitoring | The extent to which a service / activity is monitored or audited by an external body |
| Prior Audits | Overall rating of last audit and result of follow up. |
| Susceptibility to fraud and corruption | Opportunity within the system / activity for fraud and corruption to occur. |
| Staff Turnover | The turnover of staff, especially with key skills. |

3.2 The risk assessment, and update of the annual Audit Plan, is informed by consultation with key stakeholders, including:

- the Corporate Director & Chief Finance Officer.
- the Corporate Director & Monitoring Officer.
- the Corporate Management Team.
- the Council's team managers.
- the Council's external auditors.
- the Audit and Risk Management Committee.

3.3 Consultation helps ensure that stakeholder's views and risks are reasonably identified and reflected within the Plan. Where possible External Audit will place reliance on the work of Internal Audit, and other external providers of assurance will be referred to help formulate the annual Audit Opinion. This helps ensure that resources are used to the best effect, and duplication is avoided.

3.4 The plan is also informed by key corporate documents such as:

- Business Plan.
- Medium Term Financial Strategy; and
- the Council's risk registers.

4 Key themes

The key themes, which have driven our assessment of risk and strategic aims are:

| Area | Comment |
|-----------------------------------|--|
| Financial excellence | There is a continued need to ensure value for money is achieved, including financial resilience and the ability to prioritise resources within increasing financial constraints and a changing control environment. |
| Corporate Governance arrangements | The Internal Audit Manager will independently review and give an opinion on the Council's arrangements for both corporate governance and risk management, to support the production of an annual governance statement to accompany the statement of accounts. The team will maintain an awareness of emerging risks to help provide advice on effective internal controls. |
| Assurance mapping | Where other well-developed assurance processes exist (e.g., documented Control Risk Self-Assessment reviews, quality management audits, the work of other review or inspection teams) the internal audit team will quality assure these processes and consider how they can deliver a significant contribution to the overall audit opinion of internal control. |
| Improving information governance | As part of the planned audits the team will help to promote good information and data management practice throughout the organisation. |
| Risk management | Internal Audit will continue to assist teams identify business risks as part of audits. This will engage our customers in the management and maintenance of their risks and controls at an operational level and help identify and escalate concerns to the corporate risk register. |
| Minimising fraud and error | <p>The Internal Audit team will ensure that the Anti-fraud & corruption policy & strategy reflects best practice and will appraise fraud risks during audits.</p> <p>Internal controls will continue to be tested for effectiveness and the team will participate in data matching exercises, as provided by the National Fraud Initiative, to proactively identify fraud and error.</p> |
| Corporate priorities | The Corporate plan, and the Council priorities, informs the audit strategy. The annual plan is based on the risk profile of activities supporting the Corporate Plan and will continuously be revised to reflect any emerging changes to corporate risk. |

5 Audit needs and resources

- 5.1 The risk assessment process identifies auditable systems and helps to prioritise the audit plan in consultation with key stakeholders.
- 5.2 Systems assessed as below adequate assurance, during the previous financial year, which are not subject to a planned audit will be considered for a follow up review to assess the effective implementation by management of agreed audit recommendations.
- 5.3 Where common areas of risk are identified across several teams then the use of corporate themed reviews is considered to ensure an approach which is both consistent and makes effective use of resources.
- 5.4 Both the resources and capacity of the Internal Audit operational team is considered annually whilst setting the annual Plan. The Internal Audit operational team currently has 0.6 full time equivalent and vacant posts for an Internal Audit Manager and an Auditor.
- 5.5 Unproductive days, such as training and annual leave, are deducted from the total resource to calculate the total number of planned productive days.
- 5.6 Internal Audit operational team resources will enable all services of the Council to receive Audit coverage over a three-year period, although realistically some may be considered of such low priority in relation to other areas that they may only be covered in five years.
- 5.7 This Internal Audit Plan is produced and provides details for a 12-month period. The Interim Internal Audit Manager has reviewed and adjusted the plan in response to changes in the Council's business, risks, operations, programs, systems, and controls. Where work in progress occurs, it will be carried forward for completion within resources available in the next year.

6 Audit delivery

- 6.1 The approach of Internal Audit is to use risk-based reviews, supplemented in some areas using system-based audits and themed reviews. All audits have regard to management's arrangements for:
- securing the proper, economic, efficient and effective use of resources.
 - achieving key performance indicators, where appropriate.
 - preventing fraud and irregularity.
- 6.2 The internal control system contains key systems known as 'Fundamental' audits. A compliance approach is applied, as there is pre-existing confidence that controls are well designed, but the effective operation of the controls is a material concern. Testing for the effective operation of these controls is completed over a planned three-year cycle, although can be audited more frequently if assurance is required. The ARP auditing arrangements have allowed us to gain assurances on an annual basis for Council Tax, Business rates and Housing Benefits. A continuous auditing approach is adopted that spreads the testing throughout the year. This helps to ensure that the work is delivered and reduces the burden on the customer.
- 6.3 The remainder of the systems are prioritised by their risk-based assessment. The approach to each audit is agreed, with the customer, during the planning stage of the audit.
- 6.4 In addition to these planned audits the team will complete other assurance work which adds value to the organisation. Examples include proactive anti-fraud and error work such as fraud risk education and data matching, project-based assurance, contingency for responsive work, and following up previous audit recommendations
- 6.5 The PSIAS states that the Internal Audit Manager should consider accepting consulting engagements based on the potential to improve management of risks, add value and improve the organisation's operations. The team will participate in corporate projects that add value by improving governance and controls throughout the Council.
- 6.6 Requests for unplanned work will be considered against capacity to ensure internal audit's independence, and the resource required to provide the annual audit opinion, is not compromised. Any significant additional consulting activities, which impact delivery of the plan, will be communicated to the Committee.
- 6.7 The output of audits completed during the year will inform the annual audit opinion. The annual internal audit opinion will conclude on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control. This will be reported through the annual Internal Audit Outturn report which is a key source of assurance for the Annual Governance Statement (AGS).

7 Quality and performance

- 7.1 The Internal Audit Service maintains a manual, which sets out the standards to which all audit assignments are completed. It is reviewed and updated to reflect the best practice and professional standards.
- 7.2 The performance of Internal Audit is measured against targets and objectives set out in the team's Service Plan.
- 7.3 At a detailed level each audit assignment is monitored, and customer feedback sought.
- 7.4 There is ongoing performance appraisal and supervision for all Internal Audit staff during the year to support them in achieving their personal targets.
- 7.5 The Corporate Director & Chief Finance Officer shall in accordance with the Accounts and Audit regulations 2015 arrange for an assessment of quality independently of the Internal Audit service. Additionally, an external review of the Internal Audit Service is completed by external assessors every 5 years.
- 7.6 This was assessed in December 2022, where the team received the highest rating of "Generally Conforms" in all areas.
- 7.7 The Internal Audit Service will continue to liaise closely with other internal audit services through the Cambridgeshire Audit Group, the Chartered Institute of Public Finance Accountants, the Institute of Internal Auditors and the ARP shared audit partnership to share knowledge of best practice.

Appendix A: Internal Audit plan 2023/24

| Audit Title | Risk Rating | Last Audit | Last Audit results | Days |
|---|-------------|------------|--------------------|-----------|
| 2022/23 brought forward | | | | |
| Cash & Treasury Management (b/f 2021/22) | Medium | 2016/17 | Substantial | 10 |
| Housing Options | Medium | 2016/17 | Substantial | 15 |
| Licences – Animal Welfare | Medium | 2018/19 | Adequate | 10 |
| Licences – Other | Medium | 2018/19 | Limited | 10 |
| Corporate Assurance - Transparency | Medium | 2018/19 | Adequate | 10 |
| Freedom of Information | Medium | NEW | | 10 |
| Subtotal brought forward from 2022/23 | | | | 65 |
| Communities | | | | |
| Safeguarding – Follow Up | Medium | 2021/22 | Adequate | 5 |
| CCTV – Follow Up | Medium | 2020/21 | Adequate | 5 |
| Subtotal Communities | | | | 10 |
| Economy | | | | |
| Development - Fee Income | Medium | 2018/19 | Substantial | 10 |
| Trading Operations - Estates | Medium | 2019/20 | Adequate | 15 |
| Development – Planning | Medium | NEW | | 10 |
| Subtotal Economy | | | | 35 |
| Environment | | | | |
| Trading Operations - Cemetery Income | Medium | 2019/20 | Limited | 10 |
| Public Health Funerals | Medium | NEW | | 10 |
| Subtotal Environment | | | | 20 |
| Quality Organisation | | | | |
| ARP Enforcement | Medium | 2020/21 | Substantial | 1* |
| Council Tax (Fundamental) | Medium | 2020/21 | Adequate | 1* |
| Housing Benefits (Fundamental) | Medium | 2020/21 | Adequate | 1* |
| Housing Benefits – Overpayments | Medium | 2020/21 | Adequate | 1* |
| Business Rates (Fundamental) | Medium | 2020/21 | Adequate | 1* |
| Corporate Projects | Medium | | Ongoing | 10 |
| Corporate Assurance – Anti-Fraud and Corruption | Medium | 2020/21 | Ongoing | 5 |
| Corporate Assurance - Information & Data Management | Medium | 2019/20 | Substantial | 15 |
| Capital Finance Planning & Assets Register | Medium | 2018/19 | Substantial | 15 |
| Debtors & Collection Agency | Medium | 2018/19 | Substantial | 10 |
| ICT Cyber Security | High | 2022/23 | Substantial | 10 |
| Business Continuity Planning | Medium | NEW | | 10 |
| Contracts Register | High | NEW | | 10 |

| | | | | |
|---|------|-----|---------|------------|
| Subtotal Quality Organisation | | | | 90 |
| Total Risk Based Audits | | | | 220 |
| External Audits and Other Work | | | | |
| Local Authority Trading Company / FFL | High | NEW | Ongoing | 10 |
| Follow Up / Recommendations | | | N/A | 10 |
| Fraud Work – Investigations and NFI | | | N/A | 15 |
| Contingency | | | N/A | 25 |
| Subtotal External and Other Work | | | | 60 |
| Grand Total | | | | 280 |

* These audits are conducted by our ARP partner authorities, which will be reviewed by the Interim Internal Audit Manager of FDC before final reports are issued.

Appendix B: Assurance Ratings:

An assurance rating is applied, when a system or process is reviewed, which reflects the effectiveness of the control environment. The text below is an indication of the different assurance ratings used:

| Assurance Opinion | Definition |
|------------------------------|---|
| Full Assurance | In our opinion, there is a sound system of internal control that is likely to achieve the system objectives, and which is operating effectively in practice. |
| Substantial Assurance | In our opinion, there is a sound system of internal control operating, but there are a few minor weaknesses which could put the achievement of system objectives at risk. |
| Adequate Assurance | In our opinion, there is a sound system of internal control operating, but there are some weaknesses which could put the achievement of system objectives at risk. |
| Limited Assurance | In our opinion, there is a system of internal control with a number of weaknesses likely to undermine achievement of system objectives, and which is vulnerable to abuse or error. |
| No Assurance | In our opinion, there is a fundamentally flawed system of internal control that is unlikely to achieve system objectives and is vulnerable to serious abuse or error. |

Appendix C: Fundamental audit plan

This is the proposed plan for internal audit reviews of controls considered fundamental to the Council

| System Name | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | Current Overall assurance rating |
|--|---------|---------|---------|---------|---------|----------------------------------|
| Housing Benefits * | ✓ | ✓ | ✓ | ✓ | ✓ | Adequate |
| Council Tax * | ✓ | ✓ | ✓ | ✓ | ✓ | Adequate |
| Business Rates * | ✓ | ✓ | ✓ | ✓ | ✓ | Adequate |
| Capital Finance Planning & Asset Register | ✓ | | | ✓ | | Substantial |
| Debtors and Collection Agency | ✓ | | | ✓ | | Substantial |
| Creditors | | | ✓ | | | Substantial |
| Corporate Finance - Budgetary Control | | | ✓ | | | Substantial |
| Cash & Treasury Management | ✓ | | | ✓ | | Substantial |
| Corporate Finance - Management Accounting System | | ✓ | | | ✓ | Substantial |

* ARP Auditing arrangements in place allow for an audit to be undertaken every year on these services by our ARP Partner authorities.