

## Summary Sheet

**Council Report:**  
Audit Committee

**Title:**  
Implementation of Recommendations resulting from the PWC Review of Internal Audit

**Is this a Key Decision and has it been included on the Forward Plan?**  
No

**Strategic Director Approving Submission of the Report:**  
Judith Badger (*Strategic Director of Finance and Customer Services*)

**Report Author(s):**  
Colin Earl (*Assistant Director Audit, ICT and Procurement*)

**Ward(s) Affected:**  
None

**Executive Summary:**  
This report provides an update on progress against the recommendations made in the recent PWC review of Internal Audit. Progress is currently being made in accordance with the majority of the action plan, with minor changes being proposed to take into account factors external to the service.

Future reports on progress will be subject to external review as agreed by the Chief Executive at the Audit Committee meeting in February 2016. A partner has been appointed to conduct the external reviews.

**Recommendation:**  
**The Audit Committee is asked to note the progress made in implementing the recommendations included in the PWC review of Internal Audit.**

**Background Papers:**  
none

**Consideration by any other Council Committee, Scrutiny or Advisory Panel:**  
No

**Council Approval Required:**  
No

**Exempt from the Press and Public:**  
No

**Title:**

Implementation of Recommendations resulting from the PWC Review of Internal Audit

**1. Recommendations**

- 1.1 The Audit Committee is asked to note the progress made in implementing the recommendations included in the PWC review of Internal Audit.**

**2. Background**

- 2.1 Professional Standards for Internal Audit are set out in the UK Public Sector Internal Audit Standards (UKPSIAS) and these require an independent assessment of internal audit at least every 5 years.
- 2.2 In 2015 the Interim Director of Finance and Corporate Services commissioned a review of Internal Audit to be conducted by PWC, following a competitive tender exercise. The PWC review was a comprehensive assessment. The report following the review was presented to the Audit Committee in February 2016. It recommended a number of actions required to improve the service and ensure full compliance with audit standards. The action plan is attached at **Appendix 1**.

**3. Review of Progress in Implementing the Recommendations from the PWC Review**

- 3.1 Internal Audit was already aware of a number of areas it needed to develop even prior to the commencement of the PWC review, and had begun to make various improvements. PWC acknowledged this in its reporting but concluded it was too early to confirm new arrangements were effective. The PWC review highlighted other significant areas where progress needed to be made.
- 3.2 Internal Audit has continued to implement improvements identified prior to the PWC review and, since the completion of the review, the actions emanating from it.
- 3.3 Appendix 1 contains a full update of progress against the PWC recommendations. Key points are:
  - The 2015/16 audit plan has been successfully delivered (with 95% delivery achieved). At the time of the review, PWC had concerns over the Service's ability to complete the audit plan, but an injection of additional resources and increased focus on targets by the in-house team enabled sufficient work to be done to provide an opinion on the Council's control environment, as required by Accounts and Audit Regulations.
  - The format of the audit opinion given on the Council's Control Environment fully meets the requirements of the standards.

- Proposals to restructure the service in line with the recommendations of the PWC report have been put forward, with consultation on the proposals ending on 29 April
  - The restructure proposals incorporate resources to buy in specialist audit expertise as required in accordance with the mixed model approach approved by Commissioners and Members in 2015, and as successfully used during the latter part of 2015/16
  - An action plan has been produced to achieve full compliance with professional standards, and an update will be presented to the Audit Committee on 27 April 2016
  - There has been more consultation and engagement with senior management in producing the Audit Plan 2016/17. The plan, therefore, is based on a broader assessment of risks and the audit work that can add value to management's assurance over the mitigation of risks
  - A service development plan and individual PDRs will be completed following agreement to the audit and improvement plans on 27 April, and subsequent implementation of organisation review
  - Options for streamlining administration and audit processes are being explored to increase the productivity of audit resources.
- 3.4 There remains further development and improvement required to bring the service up to full compliance with standards and to where it can better add value to the development of the Council's control arrangements. A partner has been selected following a tendering exercise to assist with checking and supporting progress.
- 3.5 Progress against the action plan will be reported to the Audit Committee at each of its meetings during 2016/17. The partner will confirm the accuracy and completeness of Internal Audit's progress reports.

#### **4. Options considered and recommended proposal**

- 4.1 Any options relevant to individual recommendations are covered within the Appendix.

#### **5. Consultation**

- 5.1 The report is presented to the Audit Committee to enable it to fulfil its responsibility for overseeing the work and standards of internal audit.
- 5.3 The recently appointed Strategic Director of Finance and Customer Services has been fully briefed on the review and the actions required to improve the service, and is supportive of the actions included in the plan.

## **6. Timetable and Accountability for Implementing this Decision**

6.1 Timescales for implementation of recommendations are given in the action plan at Appendix 1. Several recommendations have been allocated an implementation date of 27 April 2016, as this is the date of the Audit Committee meeting at which the Internal Audit Annual Report 2015/16 and Audit Plan 2016/17 will be presented.

## **7. Financial and Procurement Implications**

7.1 Internal Audit is required to achieve £25,000 savings in 2016/17 and this will be achieved through a reduction in the size of core establishment as a result of vacancies and voluntary severance / retirement. The resources required to deliver the Council's audit requirements from 2016/17 will be contained within the 2016/17 budget, and will include a combination of in-house and specialist (external) resources, in line with the mixed model approach approved by Commissioners and Members.

7.2 Any financial implications specifically arising from the implementation of recommendations made in this report will be dealt with as appropriate.

## **8. Legal Implications**

8.1 The Council is required to comply with the Accounts and Audit Regulations relating to the provision of an effective internal audit function. The actions proposed in response to the PWC report are designed to ensure the Council fulfils this requirement as quickly as possible.

8.2 There are no further direct legal implications associated with this report.

## **9. Human Resources Implications**

9.1 Any HR implications emanating from the implementation of the recommendations will be addressed in full consultation with Human Resources. This could involve matters relating to staff development, skills and capabilities.

## **10. Implications for Children and Young People and Vulnerable Adults**

10.1 There are no immediate implications associated with the proposals.

## **11. Equalities and Human Rights Implications**

11.1 There are no immediate implications associated with the proposals.

## **12. Implications for Partners and Other Directorates**

12.1 Senior management, Members and other stakeholders will be consulted in relation to the future expectations for the internal audit service, as part of the implementation of recommendations made in the PWC report. The aim will be to ensure major issues and risks for services are reflected in the audit planning processes, including where relevant, partnership working.

12.2 Doncaster Council is being consulted with in regard to any short and medium term options in relation to internal audit services.

### **13. Risks and Mitigation**

13.1 The failure to maintain an effective audit function means the Council fails to comply with the Accounts and Audit Regulations, as well as failing to secure the benefits of an effective and modern internal audit that helps the Council manage its risks and adds value to control arrangements in place at the Council. More comprehensive performance management arrangements will provide better control and avoidance of this risk.

13.2 Close and regular monitoring of the implementation of recommendations included in the action plan, including regular presentation of progress to the Chief Executive and Audit Committee, will ensure any risks of failing to achieve improvements will be monitored and addressed.

### **14. Accountable Officer(s):**

Colin Earl (Assistant Director Audit, ICT and Procurement).

### **Approvals Obtained from:-**

**Strategic Director of Finance and Customer Services: Judith Badger**

**Assistant Director of Legal Services: n/a**

**Head of Procurement (if appropriate): n/a**

## REVIEW OF INTERNAL AUDIT – DETAILED ACTION PLAN

**Note: RAG Status:****Green – Completed / certain to be completed****Amber – On track / expected to be achieved / no significant issues****Red – Off target / significant action required**

Ref	Recommendation	Priority Rating	Proposed Action	Responsible Officer	Target Date	Progress	Current Status (RAG)
1	<p><b>Leadership and accountability</b></p> <p>The Council should consider the existing leadership arrangements for IA. It would seem appropriate to have one individual acting as Head of Internal Audit and Chief Audit Executive whilst also fulfilling the role of Chief Internal Auditor. This individual should be given the appropriate grade and seniority to fulfil the role and to engage with senior stakeholders across the Council. In the Local Government Application Note (2.18) it says “CIPFA and the IIA expect that the CAE should not report administratively to or be managed at a lower organisational level than the corporate management team....”</p>	High	Restructure proposals will be brought forward for consultation. They are likely to include the creation of a post of Head of Internal Audit, to report directly to the Director of Finance and Customer Services	<p><del>Interim Director of Finance and Corporate Services, in consultation with the Chief Executive and Director of Finance and Customer Services</del></p> <p>Assistant Director Audit, ICT &amp; Procurement</p>	29 February 2016	Restructure proposals published 16 March, with a consultation end date of 29 April.	<p>Green – relating to proposals produced</p> <p>Amber – relating to implementation</p>
2	<b>Structure of IA in the short to</b>	High	A new operating	Interim	29	The restructure proposals	Green –

	<p><b>medium term</b> The Council should consider its audit requirements in the short to medium term. The exact requirements will need to be agreed and will be dependent upon the Council's decisions on leadership of the function but we believe an arrangement with a third party who could provide leadership (or management support) and additional resource (including specialists) in the short term would be the most beneficial to the Council. We have been advised that consideration is already being given to this issue.</p> <p>The Council should consider the current contractor arrangements to determine if value for money is being obtained. This should form part of the wider review of the delivery model and the organisation structure of IA.</p> <p>If a full in-house function is retained, the IA function should be restructured in order to be more efficient. These changes should be alongside a review of capabilities and role definitions for each grade in order to provide a framework for staff to aspire to.</p>		<p>approach, involving a mixed delivery model, has been approved by commissioners and Members. The restructure proposals referred to at Rec 1 will implement the proposals and address the issues raised in this recommendation.</p> <p>The mixed delivery model will include a core in-house resource supplemented by specialists as required.</p>	<p><del>Director of Finance and Corporate Services, in consultation with the Chief Executive and Director of Finance and Customer Services</del></p> <p>Strategic Director of Finance and Customer Services</p>	February 2016	incorporate resources to buy in specialist audit expertise as required.	<p>relating to proposals produced</p> <p>Amber – relating to implementation</p>
3	<p><b>Shared arrangement with Doncaster Council</b> The Council should consider the merits of retaining this partnership</p>	Medium	Doncaster Council will be consulted on the outcomes of this review and	<p><del>Chief Executive</del></p> <p>Strategic</p>	31 March 2016	The Chief Executive has provided the outcomes from the review to the Doncaster Council Chief	Amber – initial consultation completed.

	arrangement. Other than the income received for the shared HIA, the Council does not appear to be benefitting in any way from this shared arrangement and the value of continuing it should be reviewed.		implications and options for the immediate and medium terms.	Director of Finance and Customer Services		Executive and agreed in principle that further consideration be given to a shared arrangement.  The Director of Finance and Customer Services will further consider arrangements with Doncaster's Director of Finance and Corporate Services.	Further consideration by 30 June 2016.
<b>4</b>	<b>PSIAS and improvement plan</b> An improvement plan should be developed by the CAE/CIA based on the recommendations made in this report and the improvements required to fully meet the PSIAS requirements. This should include allocations of responsibility and timescales and should be tracked to evidence improvement.	<b>High</b>	A detailed plan identifying actions required to achieve compliance from 2016/17 will be produced.  The plan will be implemented and a further external review of compliance completed during 2016/17.	Assistant Director Audit, ICT and Procurement	29 February 2016  31 December 2016	An action plan has been produced and an update will be presented to the Audit Committee on 27 April 2016.	Amber – plan produced subject to agreement by the Audit Committee
<b>5</b>	<b>Implementing change – new working practices</b> Changes to working practices should be supported by an implementation plan and the provision of support and training if required. Staff should be able to see opportunities for personal	<b>High</b>	Requirements relating to new approaches and methods will be drafted within the detailed improvement plan referred to in Rec 4. This will include	Assistant Director Audit, ICT and Procurement	29 February 2016	An action plan has been produced and an update will be presented to the Audit Committee on 27 April 2016.	Amber – plan produced subject to agreement by the Audit Committee

	development in the introduction of new practices – opportunities to increase coaching and supervisory skills and increase empowerment should be emphasised so that staff buy into the proposed changes.		training and development requirements relating to new approaches and methods, and a programme for delivering the support to staff.				
<b>6</b>	<p><b>Engaging with stakeholders</b> The new relationship management approach should be fully implemented although it should be reviewed to focus more on the departments' risks rather than the IA view and perspective. Staff should be encouraged to develop greater relationships outside of IA and to develop broader networks within the Council.</p> <p>Greater clarity in the audit plan around how the audit reviews link back to the Council's risks and objectives would help to demonstrate to stakeholders how internal audit is focusing its work on key risk areas.</p> <p>The Internal Audit function should undertake to raise its profile within the organisation through greater interaction at the management team and senior officer level using existing internal mechanisms.</p>	<b>High</b>	<p>Regular quarterly meetings will be held with directorate management team to review risks.</p> <p>The audit plan will be directly linked to the corporate, directorate and service plans.</p> <p>Internal Audit progress reports will be presented to the Strategic Leadership Team (SLT) prior to submission to the Audit Committee. Reports receiving</p>	Assistant Director Audit, ICT and Procurement	<p>Quarterly from March 2016</p> <p>27 April 2016</p> <p>Quarterly from March 2016</p>	<p>First (planning) meetings held with Directorate Management Teams in the lead up to the production of the 2016/17 audit plan.</p> <p>Links will be finalised to the corporate plan and risks upon approval of the corporate plan.</p> <p>The first report (The 2015/16 Annual Report) has been circulated to SLT. Future progress reports will be scheduled to be presented to SLT</p>	<p>Green – meetings held and subsequent meetings set up</p> <p>Amber</p> <p>Green</p>

			'inadequate' audit opinions will also be reported to SLT.				
7	<p><b>Support and development for IA staff</b> All staff should be encouraged to agree a development plan designed to enhance their skills and expertise. This can include both technical development and softer skills.</p>	High	Completion of better PDRs linked to the improvement and audit plans.	Assistant Director Audit, ICT and Procurement	<del>27 April 2016</del> 31 July 2016	PDRs will be completed following agreement to the audit and improvement plans on 27 April, and implementation of organisation review.	Amber (new timeline requested)
8	<p><b>Strategy and vision for internal audit</b> The Council should review the current IA strategy and vision for its Internal Audit Service and ensure it is understood and articulated to both the IA team and the wider Council. An implementation plan for the strategy should be developed which includes clear targets for people, systems and processes.</p> <p>The plan should clearly articulate how the Council will:</p> <ul style="list-style-type: none"> <li>• Match the resource needs (in terms of capacity and skill mix) of the audit plan and the Council: and</li> <li>• Develop its team to meet the current (and future) needs of the Council; (see Issue 7)</li> </ul> <p>The delivery of this plan should be monitored.</p>	High	<p>The Internal Audit Charter and Strategy will be updated to reflect the Council's expectations indicated in the PWC report and the aspirations of the UK Auditing Standards.</p> <p>The Audit Plan 2016/17 will be produced to better meet these expectations.</p> <p>The proposals set out in the Charter, strategy and 2016/17 plan will be submitted to the Strategic Leadership Team and Audit Committee for agreement.</p>	Assistant Director Audit, ICT and Procurement	27 April 2016	<p>The Charter and Strategy are being updated to take into account comments made by PWC.</p> <p>The Audit Plan 2016/17 reflects the requirements of the Charter and Strategy, including relating to resourcing.</p>	Amber (it is proposed to refresh the Internal Audit Charter and Strategy by 31 July 2016)

			The 2016/17 plan will indicate how it will be resourced using the approved mixed model approach.				
<b>9</b>	<p><b>Assurance map – identifying gaps in assurance</b></p> <p>An assurance map should be developed identifying key risks not being addressed through IA work and detailing any other sources of assurance. This should be presented to the Audit Committee as part of the annual planning process.</p>	<b>Medium</b>	The planning process will explicitly set out other forms of assurance the Council can rely on to confirm risks are managed effectively.	Assistant Director Audit, ICT and Procurement	27 April 2016	<p>The Audit Plan provides an initial evaluation of assurances available in addressing the Council's key risks.</p> <p>This will be developed during the year, to further inform the audit assessment and to support the year end annual opinion to be given by the Chief Audit Executive.</p>	Amber – initial assessment made, but further development is required.
<b>10</b>	<p><b>Risk management within the Council</b></p> <p>Consideration should be given to the role of IA in improving the Council's risk management arrangements. This should be in the form of support and facilitation building on the audit teams expertise in risk and control, whilst acknowledging that overall responsibility lies with management. We have been advised that steps are being taken by the Council to review and improve its risk management arrangements.</p>	<b>Medium</b>	The Council wishes to keep separate the responsibilities for audit and risk. It has appointed a risk manager from 1st January 2016 to drive forward improvements in risk management. The risk manager will liaise with Internal Audit as appropriate.	N/a	N/a	N/a	N/a

			However, Internal Audit will assess the management of risks when undertaking its audit work and promote effective risk management by making recommendations for improvement as appropriate.	Assistant Director Audit, ICT and Procurement	Ongoing from March 2016	All relevant Internal Audit work now includes a standard test of evidence of risk management. Findings are being passed to the Corporate Risk Manager and will be summarised in progress reports presented to SLT and the Audit Committee	Amber – commenced and evidence to be gathered throughout 2016/17
11	<p><b>Delivery of the 2015/16 internal audit plan</b></p> <p>An exercise is needed to reprioritise the audit plan and to ensure that the planned reviews in the highest risk areas are undertaken. Additional resource should be used if necessary.</p>	High	Agreed – Plan revisions to be presented to the Audit Committee on 10th February 2016. Additional resources secured to ensure adequate audit coverage is achieved for 2015/16.	Assistant Director Audit, ICT and Procurement	27 April 2016	<b>Completed</b> – injection of additional, specialist resources, and improved productivity of the core audit team has enable the service to deliver 95% of the audit plan. This is sufficient to provide an opinion on the Council’s internal control environment, as required by the Accounts and Audit Regulations.	Green – sufficient audit work completed in 2015/16
12	<p><b>Improving audit reports</b></p> <p>Audit reports should be reviewed to focus on the recipient. The emphasis should be on what the overall opinion is and what action does the recipient need to take. Care should be taken to clearly show any limitations on scope as it is rare that an audit review covers all risks associated with a system or process.</p>	Medium	The format of audit reports will be reviewed and any changes introduced from 2016/17	Assistant Director Audit, ICT and Procurement	27 April 2016	A new format of report is being introduced for 2016/17 work, to more clearly reflect the risks being assessed and the value / assurance being provided by the audit work, which should be of more relevance /	Amber

	The audit team should look for opportunities to add value by sharing insight and experiences from other parts of the Council or from elsewhere.					significance to the recipients. Views on the new format will be tested and the format refined further, as required during 2016/17.	
<b>13</b>	<b>Annual reporting</b> The CAE/CIA should review the annual reporting process in line with PSIAS. The report should be concise and the overall opinion should be clear and supported by clear information based on work completed and reported. The style of report should be reviewed in order to better present the findings of IA.	<b>Medium</b>	The 2015/16 annual report will be reviewed to comply fully with the UK Auditing Standards and to clearly summarise the work of internal audit and its results	Assistant Director Audit, ICT and Procurement	27 April 2016	<b>Completed</b> – the Internal Audit opinion on the Council's Control Environment fully meets the requirements of the standards.	Green
<b>14</b>	<b>Level of non-productive time</b> Non-productive time for internal audit should be reduced. Currently a disproportionate amount of time is spent on this within the team. More value could be obtained by the CAE/CIA determining new processes and informing the team of the rationale behind any changes.	<b>Medium</b>	Current non-productive time will be reviewed, arrangements revised where relevant and clear targets set from 2016/17.	Assistant Director Audit, ICT and Procurement	27 April 2016	The Audit Plan includes new targets for minimising non-productive time, equating to a 15% reduction on 2015/16.  Some one-off non-productive time will be accumulated though, to transition to new arrangements (eg training, new recording system).  Progress on achieving the target will be monitored	Amber

						and reported throughout the year.	
<b>15</b>	<b>Performance information</b> IA should review the process for management information including time recording and job analysis. This will facilitate greater control over audit productivity as well as providing a basis for performance monitoring. The CAE/CIA should look to agree a series of performance indicators with the S151 Officer and regularly report on these indicators to demonstrate performance of the IA function.	<b>Medium</b>	Arrangements for time recording and monitoring of progress on audit work will be assessed and revisions made as appropriate.	Assistant Director Audit, ICT and Procurement	27 April 2016	Revisions have been made to streamline the current, manual, arrangements. Review of their efficiency and effectiveness will be carried out during the course of 2016/17.  Further efficiencies should be capable of being achieved through the implementation of an electronic audit system (rec 17).	Amber
<b>16</b>	<b>Assignment review process</b> The review process for individual reports should be revisited and improved. Steps should be taken to reduce the time between audit fieldwork and report issue. Version control should be introduced and audit management should be held to account for excessive delays in reporting on audit findings.	<b>Medium</b>	Clear targets will be set and monitored for the reviewing and reporting processes, to ensure work is issued in a timely manner following completion of fieldwork.	Assistant Director Audit, ICT and Procurement	29 February 2016	Recommendations have been introduced for 2016/17 pieces of audit work. Effectiveness and efficiency will be assessed during the course of the year (2016/17).	Amber
<b>17</b>	<b>Technology</b> The CIA/CAE should consider the benefits of introducing an automated audit system to increase consistency and improve the quality assurance process.	<b>Medium</b>	Options for developing the use of automation will be considered and included in a review report for consideration by senior	Assistant Director Audit, ICT and Procurement	30 June 2016	This review will need to take into account any development of shared arrangements with Doncaster MBC Internal Audit (rec 3), which	Amber

	<p>They should also consider what immediate skills are required to deliver the current IA plan.</p>		<p>management. Skills requirements are referred to in the responses to recommendations 2 and 8</p>			<p>already has an electronic audit system. Otherwise, an assessment of other systems will be completed.</p>	
--	---	--	--	--	--	---	--