

Council Report

Audit Committee – 19 September 2017.

Title

Internal Audit Charter.

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, Finance and Customer Services.

Report Author

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Ward(s) Affected

All wards.

Executive Summary

The provision of Internal Audit is a statutory requirement for all local authorities that is set out in the Accounts and Audit (England) Regulations 2015. These state:

“each principal authority 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.”

Public Sector Internal Audit Standards (PSIAS) state:-

“the purpose, authority and responsibility of the internal audit activity must be formally defined in an Internal Audit Charter, consistent with the Definition of Internal Auditing, Code of Ethics and Standards.”

Additionally, the Standards require the “chief audit executive” (in Rotherham’s case, the Head of Internal Audit), to periodically review the Internal Audit Charter and present it to the Audit Committee for approval.

The current Charter was produced in September 2016. The attached revised Charter has been updated following the changes in Internal Audit and updates to the PSIAS.

Recommendations

The Audit Committee is asked to approve the Internal Audit Charter as attached in Appendix A.

List of Appendices Included:-

Appendix A – Internal Audit Charter

Background Papers

Public Sector Internal Audit Standards.

Accounts and Audit (England) Regulations 2015.

Committee on Standards of Public Life's Seven Principles of Public Life

Consideration by any other Council Committee, Scrutiny or Advisory Panel

No.

Council Approval Required

No.

Exempt from the Press and Public

No.

Title: Internal Audit Charter.

1. Recommendations

The Audit Committee is asked to approve the Internal Audit Charter.

2. Background

2.1 Internal Audit produced the current Charter in September 2016, at that time reflecting not only the standard approach / template recommended by CIPFA, but also including additional best practice relating to anti-fraud arrangements and arrangements for carrying out non-audit duties.

2.2 Since September 2016 the Internal Audit restructure has been completed, an internal assessment against PSIAS has been undertaken and updates to PSIAS have been published.

2.3 The revised Charter, attached at **Appendix A** reflects the new reporting structure for Internal Audit and compliance with PSIAS.

3. Key Issues

3.1 The main changes made to the current version of the Charter are:

- The Charter has been updated throughout to reflect updates to the PSIAS.
- The statutory requirements for Internal Audit are now incorporated in the Charter in Section 1.
- The PSIAS Code of Ethics has been incorporated in the Charter in Section 3.
- Greater detail on the Responsibilities of the Head of Internal Audit in Section 7.3.
- Greater detail on audit reporting for individual assignments and to the senior management and the Audit Committee in Sections 8.1 to 8.4.
- Greater detail on the range of work undertaken by Internal Audit in Section 10.3.

4. Options Considered and Recommended Proposal

4.1 This report is presented to enable the Audit Committee to fulfil its responsibility for overseeing the work of Internal Audit.

5. Consultation

5.1 The Strategic Director Finance and Customer Services has been consulted during compilation of the Internal Audit Charter.

6. Timetable and Accountability for Implementing this Decision

6.1 The Audit Committee is asked to receive this report at its September 2017 meeting.

7. Financial and Procurement Implications

7.1 There are no direct financial or procurement implications arising from this report. The budget for the Internal Audit function is contained within the budget for the Finance and Customer Services Directorate.

8. Legal Implications

8.1 The provision of Internal Audit is a statutory requirement for all local authorities that is set out in the Accounts and Audit (England) Regulations 2015. These state:

“each principal authority 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.”

8.2 Internal Audit also has a role in helping the Council to fulfil its responsibilities under s.151 of the Local Government Act 1972, which are:

“each local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs”

9. Human Resources Implications

9.1 There are no direct Human Resources implications arising from this report.

10. Implications for Children and Young People and Vulnerable Adults

10.1 The scope of Internal Audit’s work, as defined in the Charter, will extend to all areas of the Council and it’s key risks, including CYPS and Adult Services.

11. Equalities and Human Rights Implications

11.1 There are no direct Equalities and Human Rights Implications arising from this report.

12. Implications for Partners and Other Directorates

12.1 Internal Audit is an integral part of the Council’s Governance Framework, which is wholly related to the achievement of the Council’s objectives, including those set out in the Corporate Improvement Plan and Children’s Services Improvement Plan.

13. Risks and Mitigation

13.1 The following risks have been identified with regard to the implementation of the Charter:

Risk	Likelihood	Impact	Mitigation
<i>Internal Audit may have insufficient and / or ineffective resources / skills to achieve the audit plan and give an annual opinion on the Council’s risk</i>	<i>Low</i>	<i>High</i>	<i>Likelihood is low, following recruitment into the team, planned training and the projections of work that will be completed by 31 March 2018.</i>

<i>management, governance and control environment.</i>			
<i>Department processes and ways of working not adequate or effective. Staff not adequately trained / qualified / experienced to meet Standards. Audit process not aligned with Standards.</i>	<i>Low</i>	<i>High</i>	<i>Internal Assessment showed partial conformance with Standards. QAIP produced to improve conformance. Integrated software introduced which will enforce processes and improve efficiency.</i>

14. Accountable Officer

David Webster, Head of Internal Audit.



Internal Audit Charter

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1. Introduction

- 1.1 The Internal Audit Charter is a formal document that defines the internal audit activity's purpose, authority and responsibility. The internal audit charter establishes the activity's position within the organisation, including the nature of the Head of Internal Audit's functional reporting relationship with the 'board'; authorises access to records, personnel and physical properties relevant to the performance of engagements; and defines the scope of internal audit activities. Final approval of the internal audit charter resides with the 'board'.
- 1.2 Internal Audit is a statutory requirement for local authorities. The two pieces of legislation that impact upon internal audit in local authorities are:
- The Accounts and Audit (England) Regulations 2015 states that "each principal authority 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."
 - Section 151 of the Local Government Act 1972 requires every authority to make arrangements for the administration of its financial affairs and to ensure that one of the officers has responsibility for the administration of those affairs. CIPFA has defined 'proper administration' in that it should include 'compliance with the statutory requirements for accounting and internal audit'.
- 1.3 The Public Sector Internal Audit Standards (PSIAS) published in 2013 and updated in 2016 and 2017 provide a definition, mission and core principles for internal audit and the activity and standards that are mandatory. They include a Code of Ethics which Internal Auditors must conform to, covering integrity, objectivity, confidentiality and competency. They are mandatory for all internal audit departments in the UK public sector.
- 1.4 PSIAS state that the charter must:
- Define the terms 'senior management' and 'board' for the purposes of internal audit activity;
 - Cover the arrangements for appropriate resourcing
 - Define the role of internal audit in any fraud related work; and
 - Include arrangements for avoiding conflicts of interest if internal audit undertakes non-audit activities
- 1.5 Within Rotherham Council:
- 'chief audit executive' is the Head of Internal Audit
 - 'board' refers to the Audit Committee;
 - 'senior management' refers to the Chief Executive and Strategic Directors.

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- 1.6 The role of 'senior management' is not linked to a specific job title or pay grade, but includes the following key duties:-
- Input to the risk based internal audit plan (Standard 2010);
 - Receive periodic reports from the Head of Internal Audit on internal audit activity (Standard 2060); that includes follow-up reports (Standard 2500); and
 - Receive the results of the quality assurance and improvement programme from the Head of Internal Audit (Standard 1320).
- 1.7 The PSIAS lays out the role of a "board" in relation to specific standards, with the key duties being as follows:
- Approve the internal audit charter (Standard 1000);
 - Approve the risk based internal audit plan, including the approval of the internal audit budget and resource plan (Standard 1110);
 - Receiving communication from the Head of Internal Audit on internal audit performance relative to its plan and other matters (Standard 2020);
 - Receive an annual confirmation from the Head of Internal Audit with regard to the organisational independence of the internal audit activity (Standard 1110);
 - Receive the results of the quality assurance and improvement programme from the Head of Internal Audit (Standard 1320);
 - Make appropriate enquiries of the management and the Head of Internal Audit to determine whether there are inappropriate scope or resource limitations.

2. Mission, Definition and Core Principles of Internal Audit

- 2.1 The Mission of Internal Audit articulates what internal audit aspires to accomplish within the organisation and PSIAS defines this as:

'To enhance and protect organisational value by providing risk-based and objective assurance, advice and insight.'

- 2.2 Internal Auditing is defined as:-

'Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.'

- 2.3 The standards include 10 core principles for the professional practice of internal auditing. These, taken as a whole, should be present and be operating effectively in an effective internal audit function. Failure to achieve any of the core principles would imply that an internal audit

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activity was not effective as it could be in achieving internal audit's mission. The ten Core Principles are listed as follows:-

- Demonstrates Integrity
- Demonstrates competence and due professional care
- Is objective and free from undue influence (independent)
- Aligns with the strategies, objectives and risks of the organisation
- Is appropriately positioned and adequately resourced
- Demonstrates quality and continuous improvement
- Communicates effectively
- Provides risk- based assurance
- Is insightful; proactive and future - focussed
- Promotes organisational improvement.

3. Code of Ethics

3.1 Anyone delivering internal audit work for the Council must comply with the PSIAS Code of Ethics. This covers:

Integrity

The integrity of internal auditors establishes trust and thus provides the basis for reliance on their judgement.

Internal Auditors:

- Shall perform their work with honesty, diligence and responsibility
- Shall observe the law and make disclosures expected by the law and the profession
- Shall not knowingly be a party to any illegal activity, or engage in acts that are discreditable to the profession of internal auditing or to the organisation
- Shall respect and contribute to the legitimate and ethical objectives of the organisation

Objectivity

Internal Auditors exhibit the highest level of professional objectivity in gathering, evaluating and communicating information about the activity or process being examined. Internal auditors make a balanced assessment of all the relevant circumstances and are not unduly influenced by their own interests or by others in forming judgements.

Internal Auditors:

- Shall not participate in any activity or relationship that may impair or be presumed to impair their unbiased assessment. This participation includes those activities or relationships that may be in conflict with the interests of the organisation
- Shall not accept anything that may impair or be presumed to impair their professional judgement
- Shall disclose all material facts known to them that ,if not disclosed, may distort the reporting of activities under review

Confidentiality

Internal auditors respect the value and ownership of information they receive and do not disclose information without appropriate authority unless there is a legal or professional obligation to do so.

Internal Auditors:

- Shall be prudent in the use and protection of information acquired in course of their duties
- Shall not use information for any personal gain or in any manner that would be contrary to the law or detrimental to the legitimate and ethical objectives of the organisation

Competency

Internal auditors apply the knowledge, skills and experience needed in the performance of internal auditing services.

Internal Auditors:

- Shall engage only in those services for which they have the necessary knowledge, skills and experience
- Shall perform internal auditing services in accordance with the International Standards for the Professional Practice of Internal Auditing
- Shall continually improve their proficiency and effectiveness and quality of their services.

4. Independence

4.1 The Council's Internal Audit Services is an appraisal and advisory function having independent status within the Council. PSIAS state that 'Organisational independence is effectively achieved when the Head of Internal Audit reports functionally to the board'. Within RMBC this is achieved as outlined in Para 1.7.

4.2 The Head of Internal Audit:

- Has direct access to the Commissioners, Leader, Chief Executive, the Strategic Director Finance and Customer Services, the Monitoring Officer, the External Auditor, the Chair and Members of the Council's Audit Committee and any other officer or member of the Council as the Head of Internal Audit shall determine.
- Is able to make appropriate provisions for the undertaking of an objective assessment of the resource requirements of Internal Audit Services.

4.3 Internal Audit activity is free from interference in determining the scope of activity, performing work and communicating results. It is independent of all activities that it audits to enable auditors to perform their duties in a way that allows them to make impartial and effective professional judgements and recommendations without giving rise to conflicts of interest. Internal Auditors have no direct operational responsibility or authority over any of the activities they review. Accordingly, they do not

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develop or install systems or procedures, prepare records, or engage in any other activity which would normally be audited. To ensure compliance with PSIAS Standards 1130A1 and A2, Internal Auditors will not be used on internal audit engagements where they have had direct involvement in the area within the last 12 months.

- 4.4 The Internal Audit department is part of the Finance and Customer Services Directorate. The Head of Internal Audit reports administratively to the Strategic Director Finance and Customer Services.
- 4.5 To further ensure the independence of the Head of Internal Audit, the Chief Executive and Chair of the Audit Committee provide feedback into his annual Performance Development Review.

5. Authority

- 5.1 The Head of Internal Audit and Internal Audit staff have the authority to:
 - Enter any Council premises and access Council records, assets, personnel and premises, including accounting records, documents, invoices, vouchers, correspondence and other data, whether held manually or electronically, the examination of which is necessary for the proper performance of internal audit duties.
 - Require prompt response, every assistance, all information and explanation from any Council employees or Council Members necessary for the internal auditors to carry out their audit duties.
 - Require any officer of the Council to account for cash, stores or any other Council asset under their control.
 - Access as listed above, depending on the terms of the contract with the partner organisation, those items held by contractors / partner organisations that affect the business of Rotherham Council or its control environment.

6. Role and Scope of Internal Audit Work

- 6.1 Internal Audit must provide the Council with an annual independent and objective opinion on the adequacy and effectiveness of its risk management, control and governance processes.
- 6.2 This involves:
 - Reviewing and appraising risks related to the achievement of objectives and business goals, and evaluating the adequacy and effectiveness of the system of internal control related to those risks;
 - Appraising the relevance, reliability and integrity of information;
 - Reviewing compliance with those policies, plans, procedures, statutory requirements and regulations which could have a significant impact on the achievement of the Council's objectives and business operations;

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- Reviewing the means of safeguarding assets and as appropriate verifying the existence of such assets;
 - Appraising the economy, efficiency and effectiveness with which resources are employed, and the delivery of services in a best value manner;
 - Reviewing operations or projects to ascertain whether results are consistent with the Council's established objectives and goals and whether the operations or projects are being carried out as planned;
 - Maintaining a program of review and assessment to enhance the integrity and usefulness of the Council's risk management processes;
 - Maintaining a program of development, review and audit in relation to quality improvement and assurance methodologies;
 - Assisting management in conducting special assignments and investigations into any matter or activity affecting the interests of the Council.
- 6.3 The internal audit coverage will embrace the entire control environment of the Council, and will extend to all areas of the Council and its controlled entities.
- 6.4 Particular attention will be given to any aspects of the control environment affected by significant changes to the Council's risk environment.
- 6.5 Internal Audit completes advisory / consultancy work in agreement with senior management by responding to requests for audit reviews and by contributing to projects and working groups throughout the Council.
- 6.6 Internal Audit provides advice and practical support to service management in investigating fraud. Any allegation of fraud and corruption received is followed-up in accordance with the agreed procedures of the Anti-Fraud and Corruption Policy, Whistleblowing Policy and Disciplinary Procedures.
- 6.7 The Council also participates in the biennial National Fraud Initiative. Internal Audit administers the initiative.
- 6.8 Where the Council has entered into a partnership with other organisations the partnership arrangement will be subject to review. In addition, where Rotherham Council is the lead authority of a partnership or collaboration, the work undertaken will be subject to review by RMBC Internal Audit.
- 6.9 Internal Audit may undertake work for new clients by extending its work to third parties including Academies. All engagements will be performed in accordance with this Charter to an agreed schedule of audit days. The scope of Internal Audit's work for external bodies is primarily to provide assurance relating to the bodies' systems of internal control, although the bodies might also ask for additional consultancy work to be conducted. Where appropriate, Internal Audit might also be asked to assist in or carry

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out investigations into suspected irregularities. Example of this work is where internal audit carry out work for Academies.

7. Responsibilities

- 7.1 It should be noted that internal audit is not responsible for the operation of control functions within the Council; these responsibilities rest with management. Internal audit should not be regarded as a substitute for good management.
- 7.2 The primary task of Internal Audit is to review the systems of internal control operating throughout the authority, and in doing this it will adopt a predominantly risk-based approach to audit.
- 7.3 The Head of Internal Audit is required to manage the provision of a complete audit service to the Council that will include risk based, systems, and advisory audit in addition to the investigation of potential fraud and irregularity. In discharge of this duty the Head of Internal Audit has a responsibility to:
 - Prepare and implement an effective strategic and annual internal audit plan, providing for the review of significant operations of the Council, based on an assessment of risk pertaining to the achievement of Council objectives;
 - Ensure that the scopes and boundaries of individual audit assignments are in line with the plan;
 - Highlight control weaknesses and required associated improvements together with corrective action recommended to management based on an acceptable and practicable timeframe;
 - Undertake follow up reviews and action tracking to ensure management has implemented agreed internal control improvements within specified and agreed timeframes;
 - Ensure a system of close supervision of audit work;
 - Maintain the appropriate auditing standards as defined by the PSIAS.
 - Maintain a Quality Assurance and Improvement Programme including annual internal assessments and external assessments at least every five years;
 - Report the results of assessments to the Audit Committee and state that the department conforms with the standards or disclose any non-conformance;
 - Develop, implement and have oversight of internal audit methods and procedures, including the maintenance of an Audit Manual;
 - Maintain knowledge, skills and expertise within the department specifically for the investigation of fraud and irregularity;

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- Liaise with the external auditor to provide consistent advice to management and the Audit Committee;
- Prepare reports on audit and investigation activities for presentation to the Audit Committee, and other reports as may be required.
- Utilise designated internal audit resources to maximise the efficiency and effectiveness of the internal audit function.

8. Audit Reports

- 8.1 All standard audit assignments are the subject of formal reports. Draft reports are issued to the manager of the area under review. Debrief meetings are then held for agreement of the factual accuracy of findings and the necessary actions. After agreement, final reports are issued to management and the respective Strategic Director. The Head of Internal Audit considers the release of investigation reports on a case by case basis.
- 8.2 All reports that give an overall audit opinion of either “Partial Assurance” or “No Assurance” are submitted to the Chief Executive. A summary of reports is also presented to SLT meetings to inform all Strategic Directors of areas of concern within the Council.
- 8.3 Progress Reports are presented to the Audit Committee at every meeting summarising outcomes of audit activities. The reports contain significant findings and issues arising from the internal audit work undertaken
- 8.4 The Progress Reports include the tracking of audit recommendations, any agreed actions that are not implemented within the agreed timescales and any failure of managers to respond to internal audit reports and requests for information relating to the implementation of recommendations within the set time limits.
- 8.5 The Head of Internal Audit submits an annual report to the Audit Committee timed to support the Annual Governance Statement which includes:
- An annual Internal Audit Opinion on the overall adequacy and effectiveness of the Council’s framework of governance, risk management and control.
 - Any qualifications to the opinion, together with the reasons for those qualifications
 - Disclosure of any impairments to independence or objectivity
 - A summary of the audit work from which the opinion is derived (including reliance placed on work by other assurance bodies).
 - Any particular control weaknesses judged to be relevant to the preparation of the annual governance statement.
 - A comparison of work undertaken against planned work and a summary of performance of internal audit against performance targets

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- A statement on conformance with PSIAS and the results of the Internal Audit Quality Assurance and Improvement Programme.

8.6 In giving the opinion it should be noted that assurance can never be absolute, the most that can be provided is a reasonable assurance that there are no major weaknesses in governance, risk management and control processes.

9. Relationships

- 9.1 To provide optimum benefit to the organisation, internal audit works in partnership with management to improve the control environment and assist the organisation in achieving its objectives.
- 9.2 The internal audit function, as part of an effective process of service delivery, maintains good and effective working relationships with its clients and with those charged with responsibility for partner organisations.
- 9.3 It also maintains effective working relationships with the Audit Committee, the Chief Executive, the Strategic Director Finance and Customer Services, the Monitoring Officer, the External Auditor, other inspection and agency teams, and the Council's Members, management and employees.
- 9.4 Internal audit is not responsible for the management of the Council's risks; this is the responsibility of the Council's management. However, internal audit takes account of the corporate risk management processes in the way it relates to managers in the control of risks. Emphasis is placed on the importance of risk management to all managers in the Council as part of the delivery of the internal audit service.
- 9.5 Internal audit's work assists managers to better understand risk management. This is an important educational / informative role that adds value to the organisation where appropriate. Information is submitted, through routine audit and from all other forms of work on risks, to the Corporate Risk Manager as well as the relevant managers to help keep the registers up-to-date and relevant. Internal Audit regularly reviews the Council's risk management arrangements as an integral aspect of the its work.
- 9.6 Where the Council has partnership arrangements, the Head of Internal Audit ensures that there is effective and efficient control environment which takes account of the governance, risk and control framework of the partner body, and that the risks associated with such an arrangement are subject to internal audit review. Suitable protocols are in place where these safeguard the Council's interests for effective internal audit.
- 9.7 Where there are incidents of fraud the Head of Internal Audit advises or intervenes as appropriate in ensuring that there is suitable involvement with the Police or other agencies and seeks to maintain effective working relationships with them.

- 9.8 Internal audit comments on the efficient, economic and effective use of resources, where appropriate, in both the routine internal audit work and also where specifically charged with evaluating value for money / efficiency improvements.

10. Resources and Prioritisation

- 10.1 Internal Audit endeavours to maintain an effective number of staff to undertake the required workload, supported by effective systems of operation. Internal Audit applies staff in the most effective way in accordance with their experience and skills and in accordance with the PSIAS.
- 10.2 The Head of Internal Audit, s151 Officer and Audit Committee all have a responsibility to ensure Internal Audit has sufficient resources to enable it to fulfil its mandate. Significant matters that jeopardise the delivery of the plan or require changes to the plan will be identified, addressed and reported to the Audit Committee.
- 10.3 Internal Audit's annual planning process sets out clearly the range of work it expects to do.
- Risk Based Audits
This refers to our work on assessing the management of the key risks currently facing the Council.
 - Systems Audits
This includes work on fundamental financial systems that helps the s.151 officer to fulfil her statutory responsibilities for proper financial administration and control.
 - Advisory Work
This refers to our work on supporting continuous improvement by reviewing change projects and systems developments and by contributing to working groups
 - Follow Up
This is the completion of full follow up reviews for selected audits, and the tracking of the implementation of audit recommendations.
 - Responsive Work
This refers to responding to requests from management for additional work.
 - Investigations
Responding to the need to investigate potential fraud and irregularity.
 - Work for External Bodies

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There is also some work arising that does not fall into these headings such as income earning work for external bodies such as audit work for academy schools.

- 10.5 The quantum of work is identified following a full assessment of risks across the Council and after taking into account other forms of assurance available to oversee and mitigate some risks identified (for example external audit work or improvement board activities).
- 10.6 Internal Audit prepares a plan of work each year. Resources to deliver the plan of work, in terms of the level of resources and the skills required, are identified at the planning stage of the audit. Both the Head of Internal Audit and the Strategic Director Finance and Customer Services satisfy themselves at the start of the year that there are sufficient resources in place at least to deliver the plan and to give an opinion on the Council's system of governance, risk management and internal control at the end of the year, and to ensure some coverage in other necessary areas in accordance with PSIAS.
- 10.7 Where there are any deficiencies arising in resources at any stage, the Head of Internal Audit and Strategic Director Finance and Customer Services will, firstly, try to provide additional audit support to the section. Where it becomes necessary to limit the amount of work it is possible for the Service to do, work for external parties, risk related work, follow up and responsive work will be reduced.
- 10.8 Internal Audit annually carries out a review of the skills within the team and any development needs, linked to operational requirements. Training and development is prioritised to reflect the needs of the service and individuals. This enables the service to maintain appropriate expertise for the delivery of the audit plan and strategy and to continuously adapt to new developments.
- 10.9 Where necessary, appropriate staff from within the Council or from external sources, will be obtained to complete specialist reviews.

11. Fraud and Corruption

- 11.1 Managing the risk of fraud and corruption is the responsibility of management; Internal Audit will assist management in the effective discharge of this responsibility. There is a need for the Council to maintain an effective counter-fraud culture and the work of Internal Audit through testing for and preventing and detecting fraud contributes to the corporate counter fraud culture. There is a public expectation for public monies to be spent wisely and safeguarded against fraudulent activity. Accordingly, the section's audit plans provide for counter fraud activity.
- 11.2 Audit procedures alone, even when performed with due professional care, cannot guarantee that fraud or corruption will be detected. Internal Audit does not have the responsibility for the identification, prevention or

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detection of fraud and corruption. Internal Audit will, however, be alert in all their work to risks and exposures that could allow fraud and corruption.

11.4 Council Policy requires that where there is suspicion or detection of fraud or corruption by employees they report it to the appropriate manager, or if necessary, directly to the Chief Executive, Assistant Director Legal and Democratic Services or the Head of Internal Audit. Management will notify Internal Audit immediately, who will then inform the Chief Executive and, should the incident be of a significant magnitude, the Audit Committee. Depending on the nature and anticipated extent of the allegation(s), the Head of Internal Audit will normally work closely with management and other agencies, such as the Police, to ensure that the allegation(s) are properly investigated and reported so that maximum recoveries are achieved. If the irregularity or suspected irregularity involves theft or suspected theft of assets, it must be referred to the Police. In addition where a break-in is suspected, the Police must be informed immediately.

12. Performance Reporting

12.1 Performance indicators for Internal Audit are reported to each Audit Committee meeting and the Strategic Director Finance and Customer Services.

13. Definition of Consulting Services

13.1 The standards define consulting services as follows: "Advisory and client related service activities, the nature and scope of which are agreed with the client, are intended to add value and improve an organisation's governance, risk management and control processes without the internal auditor assuming management responsibility. Examples include counsel, advice, facilitation and training."

13.2 The standards require that approval must be sought from the Board for any significant additional consulting services not already included in the audit plan, prior to accepting the engagement (Standard 1130.) Within RMBC any such significant requests will be submitted to the Audit Committee for approval.