Bridgend and Vale Internal Audit Service: Head of Internal Audit's Outturn Report April 2017 to August 2017 Bridgend County Borough Council.

Executive Summary

This report provides a summary of the work completed by the Bridgend and Vale Internal Audit Shared Service for five months of the year covering the period April to August 2017 and provides the Head of Audit's initial opinion on the Council's framework of governance, risk management and internal control. Therefore, based on our work carried out so far this year, my overall opinion is that the Council's framework of governance, risk management and control is considered to be satisfactory.

Introduction

The aim of the Shared Service is to help both Councils meet high standards of service delivery. Internal Audit is an assurance function that primarily provides an independent and objective opinion to the organisation on the control environment comprising risk management, internal control and governance by evaluating its effectiveness in achieving the organisation's objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper, economic and effective use of resources. The Shared Service supports the Audit Committees in discharging their responsibilities for:

- Advising on the adequacy and effectiveness of the Council's risk management, internal control and governance processes in accordance with the requirements of the Accounts and Audit (Wales) Regulations 2015.
- Supporting both the Chief Executive and the Head of Finance with their delegated responsibilities for ensuring arrangements for the provision of an adequate and effective internal audit.
- Monitoring the adequacy and effectiveness of the Internal Audit Shared Service and Director's / Heads of Service responsibilities for ensuring an adequate control environment.

- Supporting the Head of Finance in discharging his statutory responsibilities under Section 151 of the Local Government Act 1972.
- Ensuring that the Council's External Auditor in relation to our work on the main financial systems audits can place reliance on this.

Definition of Internal Audit

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. (Source:- Public Sector Internal Audit Standards).

Statutory Framework

Internal Audit is a statutory requirement for local authorities. There are two principal pieces of legislation that impact upon internal audit in local authorities; these are:-

- Section 151 of the Local Government Act 1972 requires every authority to make arrangements for the proper administration of its financial affairs and to ensure that one of the officers has responsibility for the administration of those affairs.
- Section 5 of the Accounts and Audit (Wales) Regulations 2015 states that "a relevant 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.

All principal local authorities subject to the Accounts and Audit (Wales) Regulations 2015 must make provision for internal audit in accordance with the Public Sector Internal Audit Standards (PSIAS).

Audit Committee

It is important to ensure that the Council has a sufficiently independent and effective Audit Committee that follows best practice. Audit Committees are a key component of corporate governance. They are a key source of assurance about the Council's arrangements for managing risk, maintaining an effective control environment, and reporting on financial and non-financial performance. In addition, Internal Audit provides a key source of assurance to the Committee as to whether controls are operating effectively.

External Audit

The Council's External Auditor examines the work of Internal Audit on an annual basis in order to place reliance on this work when undertaking their audit work on the Council's Financial Statement of Accounts. The Council's External Auditors are the Wales Audit Office.

Public Sector Internal Audit Standards (PSIAS)

The Standards the Internal Audit Shared Service works to are the Public Sector Internal Audit Standards. These standards set out:

- The definition of internal auditing;
- Code of ethics.
- International standards for the professional practice of internal auditing. These standards cover the following areas:
 - o Purpose, authority and responsibility.
 - Independence and objectivity;
 - o Proficiency and due professional care;
 - o Quality assurance and improvement programme;
 - Managing the internal audit activity;
 - Nature of work;
 - Engagement planning;
 - o Performing the engagement;
 - Communicating results;
 - Monitoring progress;
 - o Communicating the acceptance of risks.

The PSIAS apply to all internal audit service providers, whether in-house or outsourced. During 2016-17 an External Assessment was undertaken to review our compliance with the Public Sector Internal Audit Standards. The External Assessor concluded that; overall the assessment identified no areas of non-compliance with the standards that would affect the overall scope or operation of the internal audit activity. Indeed, the Assessor has further stated that all auditees and statutory officers were positive in their responses and understanding of the audit process and the value it added.

It is important to note that there is a requirement within the PSIAS for an external assessment to be undertaken once every five years. The PSIAS came into effect from 1st April 2013 and therefore as a consequence of the external assessment undertaken during 2016/17, the Internal Audit Shared Service has met this requirement.

Internal Audit Coverage - April 2017 to August 2017

The level of internal audit resources required to examine all the Council's activities far exceed those available each year. It is, therefore, essential that the work of Internal Audit be properly planned to ensure that maximum benefit is gained from the independent appraisal function that internal audit provides.

Resources must be appropriately targeted by assessing the Council's total audit needs and preparing a plan that ensures systems are reviewed on a risk basis according to the impact they have on service delivery.

The Internal Audit Plan for 2017/18 is based, to a large extent, on the Council's Corporate Risk Register. This was complemented by:

- Priorities identified by Corporate Directors;
- Heads of Service key risks,
- The requirements of the Council's Section 151 Officer;
- External Audit and
- Those concerns / issues raised by Internal Audit in previous audits and our knowledge of potentially high-risk areas.

The Plan was submitted and approved by the Council's Audit Committee on 27th April 2017. The plan provides for the delivery of 1,085 productive days for the year, with a commitment of a minimum of 995 productive days. Table 1 below provides the outturn for the service for the period April to August 2017 and further detail is provided in Appendix B. The current structure for the Shared Service is under review it currently comprises 18 Full Time Equivalent employees (FTE's), however, the proposal is to reduce the number of FTE's to 14 whilst revisiting the grades to ensure the service can attract the calibre of staff required in a competitive market place. The Head of Audit aims to achieve best practice, but continues to take account of the issues of affordability at a time when both Councils are looking to make substantial reductions in costs. The service has already been vastly streamlined and continues to apply lean auditing risk based methodologies to its plan of work. At the commencement of this financial year, the service was carrying 7.5 vacant FTE posts; this has subsequently increased to 9.5 FTE. This has had an impact on the number of days delivered for the first five months of this year as indicated below.

Table 1 – Productive outturn for the period April 2017 to August 2017

Directorate	2017/18 Full Year Plan Days	2017/18 Expected days for the period April to Aug 17		2017/18 Actual Days achieved for the period April to Aug 17	
		Max.	Min.		
Chief Executive / Resources	130	54	54	24	
Operational Services and Partnerships	110	46	46	37	
Education and Family Support	160	67	52	43	
Communities	130	54	54	10	
Social Services and Wellbeing	170	71	71	42	
Cross Cutting – (Including External Client, Unplanned and Fraud and Error)	385	160	138	70	
Total	1,085	452	415	226	

As can be seen from the table above, the actual outturn for the period shows that the number of productive days expected has not been achieved. The shortfall of 189 productive days on the minimum expected is as a direct result of staff vacancies and long term sickness absence. The ability to move forward with the re-structure has been hampered by sickness absence but it is envisaged that this will be resolved before the end of September. The lack of resources within the Service is of specific concern, however work is underway to address the shortfall.

A total of 13 reviews have been completed, 11 (84%) of which have been closed with either a substantial or reasonable assurance opinion level. 1 review (8%) has identified weaknesses in the overall control environmental. The remaining one review (8%), although necessary, it did not culminate in an overall audit opinion.

Internal Control Weaknesses

There are no significant cross cutting internal control weaknesses identified so far this year which would impact on the Council's Annual Governance Statement. It should be noted that the 1 review where weaknesses have been identified was as a result of a specific investigation.

Our overall opinion on a system is based on both the materiality and impact of the system and our opinion on the internal control arrangements within the system. The combination of these factors then results in a category of risk to the Council as shown in Table 2 below:

Table 2

		MATERIALITY AND IMPACT			
	SYSTEM CONTROL	HIGH	MEDIUM	LOW	
1	Satisfactory	Moderate	Minimal	Minimal	
2	Reasonable	Moderate	Moderate	Minimal	
3	Limited – Significant Improvements required	Of Concern	Moderate	Moderate	
4	No Assurance – Fundamental weaknesses identified.	Significant	Of Concern	Moderate	

Therefore, having regards to the reviews completed so far to-date and the overall opinions given, my overall opinion is the Council's overall internal control arrangements are considered to be **satisfactory**, resulting in a "**minimal**" level of risk.

Resources, Qualifications and Experience

The Head of Internal Audit requires appropriate resources at their disposal to undertake sufficient work to offer an independent opinion on the Council's internal control environment. This is a fundamental part of the Bridgend County Borough Council's governance arrangements. The Internal Audit Annual Plan was presented to the Audit Committee in 27th April 2017, which is based on a provision of 1,085 productive days.

The Bridgend County Borough Council is in a partnership agreement with the Vale of Glamorgan Council who host the Internal Audit Shared Service. As at the 1st April 2017 the staffing structure is listed in table 5 below.

Table 5

2017-18 Staffing Structure	FTE
Operational Manager Audit - Head of Audit	1
Principal Auditor (1 vacant post at present)	2
Group Auditor	2
Group Auditor (Information Systems – vacant at present)	1
Auditor (5.5 posts are vacant at present)	9.5
Trainee Auditor (vacant at present)	1
Trainee Auditor (Information Systems) (vacant at present)	1
Administrative Assistant	0.5
Total	18

The Head of Audit aims to achieve best practice but continues to take account of the issues of affordability at a time when both Councils are looking to make substantial reductions in costs. The service has already been vastly streamlined and continues to apply lean auditing risk based methodologies to its plan of work. At the commencement of this financial year the Section was carrying 7.5 vacant posts, and this has increased to 9.5 vacant full time equivalent posts. The level of vacancies and the ability to recruit is of serious concern. A re-structure of the service is underway which should be concluded by the end of September in addition contingency plans are proceeding to address the shortfall in the ability to deliver the productive days planned.

In accordance with the Public Sector Internal Audit Standards, the Head of Audit must ensure that Internal Auditors possess the knowledge, skills and competencies needed to perform their individual responsibilities. Internal Auditors are therefore encouraged to study for and obtain professional qualifications. In addition, it is a requirement of the standard that the Head of Audit must hold a professional qualification and be suitably experienced. The following information outlined in table 7 below demonstrates the experience and qualification mix for the Internal Audit Shared Service.

Experience and Qualifications

Table 7

No of Years Experience	No of years in Auditing	No of Years In Local Government	Professional Qualifications		No of Staff.	
Up to 1 year	0	0		Accountants (CIPFA; FCCA; ICAEW)	2	
1 to 2 years	0	0		Certified Information Systems Auditor (CISA)	1	
2 to 5 years	0	0		Institute of Internal Auditors – full membership and Prince2 Practitioner Level	0	
5 to 10 years	3.5	3.5		Institute of Internal Auditors – practitioner level; part qualified or audit certificate	2	
Over 10 years	5	5		Association of Accounting Technicians (AAT)	0	
				Part Qualified AAT	0	
				Studying (CISA, AAT, IIA, CIPFA etc.)	0	
Total Staff	8.5	8.5		Total	5	

All staff are encouraged to attend relevant courses and seminars to support their continual professional development. All staff have the opportunity to attend courses run by the Welsh Chief Auditors Group on a diverse range of topics. Individuals keep records of their continuing professional development based on their professional body requirements.

Internal Audit - Other Activities

- Anti-Fraud the Internal Audit Shared Service continues to assist in promoting an anti-fraud and corruption culture. We have
 ensured that staff are made aware; via StaffNet; of any recent scams and frauds that have occurred in both the public and private
 sectors.
- National Fraud Initiative The Council, via Internal Audit, has again participated in the National Fraud Initiative (NFI) as part of the statutory external audit requirements. This brings together data from across the public sector including local authorities, NHS, other government departments and other agencies to detect "matches" i.e. anomalies in the data which may or may not be indicative of fraud, for further investigation.
- Advice and Guidance Internal Audit continues to provide advice and guidance both during the course of audits and responding
 to a wide range of ad-hoc queries.
- Attendance at and contribution to, working groups etc. The Section continues to contribute to the development of the Council and ensuring that we are up to date with best practice by attending the following:-
 - Audit Committee;
 - Scrutiny Committees (as required);
 - Cabinet (as required);
 - Corporate Management Team /Board (as required);
 - Corporate Improvement Group.
 - The Welsh Chief Auditors Group and all its sub-groups (including South Wales Computer Audit Group; South East Wales Education Audit Group; Social Services Audit Group).
- **Investigation Work** We continue to support Senior Management in providing resources and expertise in investigating allegations of fraud and misappropriation.

Internal Audit – Review of Performance Management and Quality Assurance Framework

The Public Sector Internal Audit Standards requires that the Head of Internal Audit develops and maintains a quality assurance and improvement programme that covers all aspects of the internal audit activity. The section has a "Quality Assurance and Improvement Programme (QAIP) that has been presented to, and approved by, the Audit Committee.

- **1. Performance Management –** the section's key performance indicators are set out in the section below.
- 2. Quality Assurance each individual audit report and supporting working papers / documents are reviewed by either a Principal Auditor or the Head of Audit. Appropriate standards have been set by the Head of Internal Audit in accordance with the Standards. The file reviews ensure the audits comply with the Section's internal processes and procedures and the overall Public Sector Internal Audit Standards. Where necessary corrective action is taken.

Internal Audit – Performance

The Section participates annually in the Welsh Chief Auditors Group benchmarking exercise. The results for 2016/17 have recently been received and are as follows:

Table 8

Performance Indicator	IASS	Overall Average	IASS	Overall Average
2016/2017	Performance for	Performance	Performance	Performance
	BCBC	2016/17	For the BCBC	2015/16
	2016/17		2015/16	
Percentage of Planned Audits Completed	91	84%	98%	84%
Number of Audits Completed	75	90	102	95
Percentage of Audits Completed in Planned Time	63	63%	87%	70%
Percentage of directly chargeable time, actual versus	97.8	92%	99%	92%
planned				
Average number of days from audit closing meeting to	9.5	8 days	9.5 days	6.8 days
issue of draft report.				
% of staff leaving during the Financial Year	30.6*	10%	3%	9%

^{*}combined figure for the shared service

Governance Arrangements

The governance framework comprises the systems and processes, and cultures and values, by which the Council is directed and controls its activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.

The system of internal control is a significant part of the governance framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness.

Good Governance is about doing the right things, in the right way, for the right people in a timely, inclusive, open, honest and accountable way.

Bridgend County Borough Council is committed to the principles of good governance and as a result has adopted a formal Code of Corporate Governance (COCG) for the last six years. The Code of Governance is based upon the six principles as defined by the Chartered Institute of Public Finance and Accountancy (CIPFA), the Society of Local Authority Chief Executives (SOLACE) and incorporates the "Making the Connections" governance principles and values as set out by the Welsh Government.

The COCG also makes provision for a joint commitment by Members and Officers to the principles it contains, as well as a statement of assurance jointly signed by the Leader of the Council and the Chief Executive. This helps to ensure that the principles of good governance are not only fully embedded but also cascade through the Council and have the full backing of the Leader of the Council and elected Members, as well as the Chief Executive and the Corporate Management Board. The work of the Internal Audit Shared Service represents a fundamental function in delivering the Council's Corporate Governance responsibilities.

Across the whole of the United Kingdom, local councils are facing unprecedented challenges following reduced Government funding and increased demands on essential services. Between 2016-17 and 2019-20, the Council is expecting to have to make budget reductions of up to £35.5 million. Budget cuts of this scale present a significant challenge that will require the Council to make many difficult decisions about what services can be maintained and what cannot.

The Council remains unwavering in its commitment towards improving and finding ways of delivering local services, providing better outcomes for residents and achieving savings that will ensure they can deliver a succession of balanced budgets.

As stated earlier in the report, based on the work completed so far to date by the Internal Audit Shared Service for the period April to August 2017; no significant cross cutting control issues have been identified that would impact on the Council's overall control environment. The weaknesses that have been identified are service specific and relate to an investigation. The recommendations made to improve the overall control environment have been accepted and are being / will be implemented.

Of significant issue for the Internal Audit Shared Service is the current lack of resource and this is having an impact on the 2017/18 Audit Risk Based Plan. Carrying over 53% of its resource in vacant posts is unsustainable and without doubt will be a very difficult year for the service. A re-structure is underway which should be concluded by the end of September together with contingency measures to address the shortfall in the delivery of productive days.

In addition, Internal Audit is very mindful of the fact that in a Council of this size and complexity, with its significant savings requirements, there is an inherent risk of breakdown in the systems of control particularly where roles, responsibilities and systems are changing. It is clear that the scale of the challenges to come will mean that "business as usual", however well managed, will not be enough. The challenge will be to consider alternative delivery models for services across the Council and this will be essential to mitigate the impact of cuts and assist in continuing to provide priority services. Therefore, as the Council continues to experience reduced resources, increased demands on services and new and innovative forms of delivery; there is a need to ensure that the control environment; including governance and risk management; remains robust, proportionate and is as efficient and effective as possible.