

Cheltenham Borough Council

Proposed 2020/21 Internal Audit Plan and Internal Audit Charter

The Internal Audit Plan: Summary

The internal audit plan represents a summary of the proposed audit coverage that the internal audit team will deliver throughout the 2020/21 financial year.

Delivery of an internal audit programme of work that provides sufficient and appropriate coverage, will enable us to provide a well-informed and comprehensive year-end annual internal audit opinion.



Introduction and Objective of the Internal Audit Plan

Internal audit provides an independent and objective opinion on the Authority's risk management, governance, and control environment by evaluating its effectiveness.

Prior to the start of each financial year, SWAP, in conjunction with senior management, put together a proposed plan of audit work. The objective of our planning process and subsequent plan is to put us in a position to provide a well-informed and comprehensive annual audit opinion, based on sufficient and appropriate coverage of key business objectives, associated risks, and risk management processes.

The outcomes of each of the audits in our planned programme of work, will provide senior management and Members with assurance that the current risks faced by the Authority in these areas are adequately controlled and managed.

It should be noted that internal audit is only one source of assurance, and the outcomes of internal audit reviews should be considered alongside other sources, as part of the 'three lines of defence' assurance model. Key findings from our internal audit work should also be considered in conjunction with completion of the Authority's Annual Governance Statement (AGS).

It is the responsibility of the Authority's Executive Leadership and Corporate Management Team, and the Audit, Compliance and Governance Committee, to determine that the audit coverage contained within the proposed audit plan is sufficient and appropriate in providing independent assurance against the key risks faced by the organisation.

When reviewing the proposed internal audit plan (as set out in Appendix 1), key questions to consider include:

- Are the areas selected for coverage this coming year appropriate?
- Does the internal audit plan cover the organisation's key risks as they are recognised by the Executive Leadership and Corporate Management Teams and Audit, Compliance and Governance Committee?
- Is sufficient assurance being received within our annual plan to monitor the organisation's risk profile effectively?



The Internal Audit Plan: Approach

To develop an appropriate risk-based audit plan, SWAP have consulted with senior management, and Members of the Audit, Compliance and Governance Committee, as well as reviewing key documentation, in order to obtain an understanding of the organisation's strategies, key business objectives, associated risks, and risk management processes.



Approach to Internal Audit Planning 2020/21

The factors considered in putting together the 2020/21 internal audit plan have been set out below:



Due to the pace of change within Local Authorities, it is becoming increasingly difficult to accurately predict longer-term key organisational risks. Our approach to delivering your internal audit plan will remain flexible to meet that change and respond to new and emerging risks.

We will adopt an 'agile' approach and each quarter I will review the next quarter's plan to ensure that we are auditing the right areas at the right time; any necessary changes will of course be agreed with Senior Management and the Audit, Compliance and Governance Committee will be kept informed.

The Internal Audit Plan: Risk Assessment

A documented risk assessment prior to developing an internal audit plan, ensures that sufficient and appropriate areas are identified for consideration.

As above, it is the responsibility of the Authority's Executive Leadership and Corporate Management Teams, and the Audit, Compliance and Governance Committee to ensure that, following our risk assessment, the proposed plan contains sufficient and appropriate coverage.



Internal Audit Annual Risk Assessment

Our 2020/21 internal audit programme of work is based on a documented risk assessment, which SWAP will revisit regularly, but at least annually. The input of senior management as well as review of the Authority's risk register has been considered in this process.

Below we have set out a summary of the outcomes of the risk assessment for Cheltenham Borough Council

Local Issues

Delivery of services, and efficiencies, by Publica Group (Support) Ltd Modernisation Programme Cyber Park

Regional Issues

Digital Strategy & Transformation
Financial Sustainability & Use of Reserves
Achievement of Transformation Saving Targets
Robustness of Medium-Term Financial Plans
Emergency Planning & Business Continuity
Commissioning & Contract Management
Effective Recruitment & Retention of Staff
Organisational Culture
Health & Safety

Risk Assessment

National Issues

Climate Change Impact of Brexit

Use of Artificial Intelligence, Robotics & Machine Learning

Management & Effective Use of Big Data Apprenticeship Schemes

Alternative Delivery Models to Deliver Services Supply Chain Management & Supplier Resilience IR35 tax changes

Ongoing GDPR Compliance

Core Areas of Recommended Coverage

Risk Management
Financial Management
Corporate & Ethical Governance
Performance Management
Cyber Security
Information Management
Procurement and / or Contract Management
Transformation Programme Management & Benefits

Realisation



The Internal Audit Plan: Coverage

Following our SWAP Risk Assessment above, we have set out how the proposed 2020/21 plan presented in Appendix 1 provides coverage of our core areas of recommended coverage.

Going forwards, we will look to align our audit programme of work with the Authority's Corporate objectives, as well as our core areas of recommended coverage.

Internal audit is only one source of assurance; therefore, where we have highlighted gaps in our coverage, assurance should be sought from other sources where possible in order to ensure sufficient and appropriate assurances are received.



Internal Audit Coverage in 2019/20

Following our SWAP risk assessment, we have set out below the extent to which the proposed plan presented in Appendix 1 provides coverage of our core areas of recommended coverage. Where we have highlighted limited or no coverage, Senior Management and the Audit, Compliance and Governance Committee should seek and document assurance from alternative sources, or consider re-focussing internal audit resource to provide coverage of these areas:



Internal audit coverage can never be absolute and responsibility for risk management, governance and internal control arrangements will always remain fully with management. As such, internal audit cannot provide complete assurance over any area, and equally cannot provide any guarantee against material errors, loss or



The Internal Audit Plan: SWAP

SWAP Internal Audit Services is a public sector, not-for-profit partnership, owned by the public sector partners that it serves. The SWAP Partnership now includes 26 public sector partners, crossing eight Counties, but also providing services throughout the UK.

As a company, SWAP has adopted the following values, which we ask our clients to assess us against following every piece of work that we do:

- Candid
- Relevant
- Inclusive
- Innovative
- Dedicated

fraud.

Your Internal Audit Service

Audit Resources

The 2020/21 internal audit programme of work is summarised at Appendix 1. The current internal audit resources available represent a sufficient and appropriate mix of seniority and skill to be effectively deployed to deliver the planned work. The key contacts in respect of your internal audit service for Cheltenham Borough Council are:

Lucy Cater, Assistant Director – lucy.cater@swapaudit.co.uk, 07720 312470

Jaina Mistry, Principal Auditor – jaina.mistry@swapaudit.co.uk, 01285 623337

Shelley Coleman, Senior Auditor – shelley.coleman@swapaudit.co.uk, 01285 623343

External Quality Assurance

SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors (IPPF).

Every three years, SWAP is subject to an External Quality Assessment of Internal Audit Activity. The last of these was carried out in February 2020 which confirmed general conformance with the IPPF.

Conflicts of Interest

We are not aware of any conflicts of interest within Cheltenham Borough Council that would present an impairment to our independence or objectivity. Furthermore, we are satisfied that we will conform with our IIA Code of Ethics in relation to Integrity, Objectivity, Confidentiality, and Competency.

Consultancy Engagements

As part of our internal audit service, we may accept proposed consultancy engagements, based on the engagement's potential to improve management of risk, add value and improve the organisation's operations. Consultancy work that is accepted, will contribute to our annual opinion and will be included in our plan of work.

Approach to Fraud

Internal audit may assess the adequacy of the arrangements to prevent and detect irregularities, fraud and corruption. Any findings, which could be constituted as fraud, will be reported to the Council's Counter Fraud Unit for investigation.



The Internal Audit Plan: SWAP

Over and above our internal audit service delivery, SWAP will look to add value throughout the year wherever possible. This will include:

- Benchmarking and sharing of best-practice between our publicsector Partners
- Regular newsletters and bulletins containing emerging issues and risks
- Communication of fraud alerts received both regionally and nationally
- Annual Member training sessions

The primary responsibility for preventing and detecting corruption, fraud and irregularities rests with management who should institute adequate systems of internal control, including clear objectives, segregation of duties and proper authorisation procedures.

Our Reporting

A summary of internal audit activity will be reported quarterly to senior management and the Audit, Compliance and Governance Committee. This reporting will include any significant risk and control issues (including fraud risks), governance issues and other matters that require the attention of senior management and/or the Audit, Compliance and Governance Committee. We will also report any response from management to a risk we have highlighted that, in our view, may be unacceptable to the organisation.

Internal Audit Performance:

As part of our regular reporting to senior management and the Audit, Compliance and Governance Committee, we will report on internal audit performance. The following performance targets will be used to measure the performance of our audit activity:

Performance Measure	Performance Target
Delivery of Annual Internal Audit Plan Completed at year end	>90%
Quality of Audit Work Overall Client Satisfaction (did our audit work meet or exceed expectations, when looking at our Communication, Auditor Professionalism and Competence, and Value to the Organisation)	>95%
Outcomes from Audit Work Value to the Organisation (client view of whether our audit work met or exceeded expectations, in terms of value to their area)	>95%



It should be noted that the audit titles and high-level scopes included below are only indicative at this stage for planning our resources. At the start of each audit, an initial discussion will be held to agree the specific terms of reference for the piece of work, which includes the objective and scope for the review.

Link to Key Priorities / Corporate Risk Register or Healthy Organisation Theme	Areas of Coverage and Brief Rationale	Proposed Quarter
Corporate Governance Corporate Governance refers to the strategic management practices and values and beliefs by which the Council operates.	Governance Arrangements for Cyber Cheltenham Assessment of the Governance Arrangements in respect of Cyber Cheltenham. Marketing Cheltenham Review to ensure the governance and accountability of Marketing Cheltenham are appropriate and	ТВС ТВС
	transparent. CBC Lending Council Review of the Council's involvement in the Folk2Folk scheme, to include agreements, repayment plans, interest calculations.	ТВС
Risk Management Organisations which can demonstrate and operate under a structured and active risk management approach, are far more likely to be able to focus upon their key priorities and outcomes and, in doing so, take informed and robust decisions.	Risk Management To review a specific element of the Council's Risk Management process – Suggested area to review is risk identification and description.	4
Performance Management Performance management provides a transparent platform upon which the service is accountable to its citizens and	Performance Management A review of an element of Performance Management – Suggested area to review is the Appraisal Process. Building Control Review of the Building Control process offering suggestions for improvement where appropriate.	4 TBC
service users for the effectiveness of its service provision and delivery of its objectives.	Reporting of Statutory Planning Application Data Review to assess the statutory data published in respect of planning applications.	ТВС

Link to Key Priorities / Corporate Risk Register or Healthy Organisation Theme	Areas of Coverage and Brief Rationale	Proposed Quarter
Financial Management Effective Financial Management is the bedrock of any successful organisation and is vital to the ongoing ability of local authorities to deliver services that the public wants.	Core Financials – Publica Controls and Transactional Testing A review of the controls operating within Publica in respect of the Core Financial systems: Payroll Accounts Payable (Creditors) Accounts Receivable (Debtors) Treasury Management and Bank Reconciliations Main Accounting, Capital Accounting and Budgetary Control Transactional testing will be undertaken for the Council where appropriate to ensure compliance with Council Policies and Procedures. Depending on previous years audit assurances a high-level review may be deemed appropriate. Off Payroll Working (IR35) Review to ensure compliance with HMRC's IR35 legislation, ensuring any changes made to legislation by HMRC have been actioned. Human Resources A review of an element of the Human Resources (HR) service – Suggested area to be reviewed is the Recruitment Process. Other Publica Area Review to be undertaken of either Procurement / Health and Safety / Insurance. Suggested area for review for 2020/21 is the Safety of Staff undertaking site visits (not planning officers). Review to include Personal Protective Equipment (PPE), Training and Treatment of Hazardous Waste. Revenues and Benefits A review of the controls operating in respect of: Council Tax National Non-Domestic Rates Housing Benefit and Council Tax Support The programme of activity ensures full coverage of the services over a 3-year cycle	3
	CBC Lottery Review to ensure monies / grants are awarded in accordance with policy / procedure, to include an assessment of applications.	ТВС



Link to Key Priorities / Corporate Risk Register or Healthy Organisation Theme	Areas of Coverage and Brief Rationale	Proposed Quarter
	Leisure and Culture Facilities Review to determine how the Council ensures the leisure service provider(s) are adhering to statutory Health and Safety regulations. Review to test requested confirmations for tests such as fixed wire testing, fire alarm systems and emergency lighting tests. Property Related Health and Safety Review to assess the Health and Safety arrangements at the Council's properties including confirmation of testing of Fixed Wire, Emergency Lighting and PAT testing. Use of Third-Party Workers Review of the recruitment and on-going personnel management of agency / contractor / temporary / third-party workers who work at / on behalf of the Council. Are HR related considerations, processes and controls robust enough within individual service areas? Climate Change Review to assess what business areas are doing to support the Council's commitment to the Climate Emergency. Inclusivity and Diversity Review to assess the Council's efforts to be externally (stakeholders / customers) inclusive and diverse.	TBC TBC TBC TBC
Link to Key Priorities / Corporate Risk Register or Healthy Organisation	Areas of Coverage and Brief Rationale	Proposed Quarter



Theme		
Information Management Effective Information Management will facilitate and support effective working, better decision-making, improved customer service and business transformation.	ICT Audits Four audits to be conducted during the year. Scope to be defined and agreed following the results of the Cyber Security audit.	1-4
Procurement and / or Contract Management Assessing Procurement & Commissioning activity of a Local Authority is a critical determinant in establishing its	Management and Monitoring of Contracts (audit deferred from 2019/20) Review to assess the arrangements in place for the management and monitoring of contracts. Audit to include service provision is in accordance with the contract, use of purchase orders, managers ensure contract sums paid agree with values included in contract, variances / extra charges are challenged, recorded and confirmed prior to payment.	1
effectiveness in both being able to deliver benefit for its community, but also in showing whether it can maximise value for	Publica Transformation Benefits Realisation (audit deferred from 2019/20) Provision made in the Audit Plan to enable IA to give assurance(s) to the Council in respect of Benefits Realisation for the Publica Transformation Programme.	1
money for its taxpayers.	The Delivery of Services by Publica Review to assess how the Council is getting assurance that Publica is delivering as per contracts / service level agreements. To include an assessment of metrics.	ТВС
Programme and Project Management Organisations which can demonstrate and operate under a structured and active	Emerging Groups / Programmes / Projects Provision made in the Audit Plan to enable IA to support any current, or emerging Groups / Programmes / Projects. E.g. Parking Strategy, Cheltenham Task Force, Cyber Business Park.	1-4
approach are far more likely to be able to focus their efforts and successfully achieve the delivery of anticipated outcomes.	Governance of Programmes and Projects Review of the programme and project framework.	ТВС

Link to Key Priorities / Corporate Risk Register or Healthy Organisation Theme	Areas of Coverage and Brief Rationale	Proposed Quarter
Other	Management Preparation of IA Monitoring Reports and preparation and attendance at Audit, Compliance and Governance Committee. Annual Audit Planning. Attendance at Governance and Risk Groups. High level programme monitoring. Liaison meetings with CFOs and Management Teams. Follow-Up Audits	1-4
	Follow-Up of Previous Years audits with recommendations.	1 – 4
	Follow-Up of all High Priority Recommendations. Follow-Up of Property Use of Contractors (2019/20).	1-4
	Follow-Up of Systems Admin – ensuring outstanding recommendations have been actioned. Grant Certification Review (income and expenditure) and certification of Disabled Facilities Grants and Additional Funding,	2 and 3
	ensuring finding requirements have been met. Working with the Counter Fraud Unit	1-4
	Provision to ensure collaborative working with the CFU and to ensure control weaknesses, identified during CFU activity, are being actioned. Regular liaison meetings. Contingency Provision for new work based on emerging risks and Investigations.	1-4

Reserve Audits	Income Streams
These audits will be used to substitute	
any work that cannot be progressed	
during the year for any reason.	

The Internal Audit Charter

Purpose

The purpose of this Charter is to set out the nature, role, responsibility, status and authority of internal auditing within Cheltenham Borough Council, and to outline the scope of internal audit work.

Approval

This Charter was last approved by the Audit Committee on 24th April 2019 and is reviewed each year to confirm it remains accurate and up to date.

Provision of Internal Audit Services

The internal audit service is provided by SWAP Internal Audit Services (SWAP). SWAP is a Local Authority controlled company. This charter should be read in conjunction with the Service Agreement, which forms part of the legal agreement between the SWAP partners.

The budget for the provision of the internal audit service is determined by the Council, in conjunction with the Members Meeting. The general financial provisions are laid down in the legal agreement, including the level of financial contribution by the Council, and may only be amended by unanimous agreement of the Members Meeting. The budget is based on an audit needs assessment that was carried out when determining the Council's level of contribution to SWAP. This is reviewed each year by the Chief Financial Officer (S151 Officer) in consultation with the Chief Executive of SWAP.

Role of Internal Audit

The Accounts and Audit (England) Regulations 2015, state 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 the public sector internal auditing standards or guidance."

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

Responsibilities of Management and of Internal Audit

Management¹

Management is responsible for determining the scope, except where specified by statute, of internal audit work and for deciding the action to be taken on the outcome of, or findings from, their work. Management is responsible for ensuring SWAP has:

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¹ In this instance Management refers to the Senior Management Team

- the support of management and the Council; and
- direct access and freedom to report to senior management, including the Council's Chief Executive and the Audit, Compliance and Governance Committee.

Management is responsible for maintaining internal controls, including proper accounting records and other management information suitable for running the Authority. Management is also responsible for the appropriate and effective management of risk.

Audit, Compliance and Governance Committee²

The Audit, Compliance and Governance Committee is responsible for approving the scope of internal audit work, receiving communications from the SWAP Assistant Director on the progress of work undertaken, reviewing the independence, objectivity, performance, professionalism and effectiveness of the Internal Audit function, and obtaining reassurance from the SWAP Assistant Director as to whether there are any limitations on scope or resources.

Internal Audit

The SWAP Assistant Director, as Head of Internal Audit, is responsible for determining the scope, except where specified by statute, of internal audit work and for recommending the action to be taken on the outcome of, or findings from, their work.

Internal audit is responsible for operating under the policies established by management in line with best practice.

Internal audit is responsible for conducting its work in accordance with the Code of Ethics and Standards for the Professional Practice of Internal Auditing as set by the Institute of Internal Auditors and further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS); SWAP has been independently assessed and found to be in Conformance with the Standards.

Internal audit is not responsible for any of the activities which it audits. SWAP staff will not assume responsibility for the design, installation, operation or control of any procedures. Members of SWAP who have transferred in to the department from other areas in Cheltenham Borough Council and / or Publica Group (Support) Ltd will not be asked to review any aspects of their previous department's work until one year has passed since they left that area.

Relationship with the External Auditors/Other Regulatory Bodies

Internal Audit will co-ordinate its work with others wherever this is beneficial to the organisation.

Status of Internal Audit in the Organisation

The Chief Executive of SWAP is responsible to the SWAP Board of Directors and the Members Meeting. The Chief Executive of SWAP and the Assistant Director also report to the Chief Financial Officer (S151 Officer), and reports to the Audit, Compliance and Governance Committee as set out below.

In this instance Audit, Compliance and Governance Committee relates to "The Board" referred to in the PSIAS.

The Assistant Director will be the first and primary point of contact for Cheltenham Borough Council for all matters relating to the Audit, Compliance and Governance Committee, including the provision of periodic reports, as per company policy. The Assistant Director is also responsible for the design, development and delivery of audit plans, subject to the agreement of the partner or client.

Scope and authority of Internal Audit work

There are no restrictions placed upon the scope of internal audit's work. SWAP staff engaged on internal audit work are entitled to receive and have access to whatever information or explanations they consider necessary to fulfil their responsibilities to senior management. In this regard, internal audit may have access to any records, personnel or physical property of Cheltenham Borough Council.

Internal audit work will normally include, but is not restricted to:

- reviewing the reliability and integrity of financial and operating information and the means used to identify, measure, classify and report such information;
- evaluating and appraising the risks associated with areas under review and make proposals for improving the management of risks;
- appraise the effectiveness and reliability of the enterprise risk management framework and recommend improvements where necessary;
- assist management and Members to identify risks and controls with regard to the objectives of the Council and its services;
- reviewing the systems established by management to ensure compliance with those policies, plans, procedures, laws and regulations which could have a significant impact on operations and reports, and determining whether Cheltenham Borough Council is in compliance;
- reviewing the means of safeguarding assets and, as appropriate, verifying the existence of assets;
- appraising the economy, efficiency and effectiveness with which resources are employed;
- reviewing operations or programmes to ascertain whether results are consistent with established objectives and goals and whether the operations or programmes are being carried out as planned, with performance and accountabilities established;
- reviewing the operations of the council in support of the Council's anti-fraud and corruption policy;
- at the specific request of management, internal audit may provide consultancy services provided:
 - > the internal auditor's independence is not compromised
 - > the internal audit service has the necessary skills to carry out the assignment, or can obtain such skills without undue cost or delay
 - > the scope of the consultancy assignment is clearly defined, and management have made proper provision for resources within the annual audit plan
 - > management understand that the work being undertaken is not internal audit work.

Planning and Reporting

SWAP will submit to the Audit, Compliance and Governance Committee, for approval, an annual internal audit plan, setting out the recommended scope of their work in the period.

APPENDIX 2

The annual plan will be developed with reference to the risks the organisation will be facing in the forthcoming year, whilst providing a balance of current and ongoing risks, reviewed on a cyclical basis. The plan will be reviewed on a quarterly basis to ensure it remains adequately resourced, current and addresses new and emerging risks.

SWAP will carry out the work as agreed, report the outcome and findings, and will make recommendations on the action to be taken as a result to the appropriate manager and Corporate Director. SWAP will report a summary of their findings, including any persistent and outstanding issues, to the Audit, Compliance and Governance Committee at least four times a year.

Internal audit reports will normally be by means of a brief presentation to the relevant manager accompanied by a detailed report in writing. The detailed report will be copied to the relevant line management, who will already have been made fully aware of the detail and whose co-operation in preparing the summary report will have been sought. The detailed report will also be copied to the Chief Financial Officer (S151 Officer), other relevant line management, and when appropriate, Publica Exec.

The Assistant Director will submit an annual report to the Audit, Compliance and Governance Committee providing an overall opinion of the status of risk and internal control within the Council, based on the internal audit work conducted during the previous year.

In addition to the reporting lines outlined above, the Chief Executive of SWAP and the Assistant Director have the unreserved right to report directly to the Leader of the Council, the Chairman of the Audit, Compliance and Governance Committee, the Council's Chief Executive or the External Audit Manager.

Revised, February 2020

Cheltenham Borough Council Proposed Internal Audit Plan 2020/21

A Move to Agile Auditing

When delivering the 2020/21 Internal Audit Programme of work, as presented, we will be looking to embrace the concept of Agile Auditing.

What is Agile Auditing?

Agile Auditing breaks a typical audit engagement down into several shorter stages, with us reporting any findings as we go. It involves increased communication and collaboration with stakeholders throughout the audit process, with greater speed but also transparency. It is likely to involve a team of audit staff instead of one individual.

Why the move to it?

- We recognise that the speed of change (and subsequent risk) is increasing within our Partners. As auditors we therefore need to adapt in order to be able to react and respond quicker.
- We constantly seek ways in which we can add value to our Partners, in order to help them succeed. Increased communication and collaboration through Agile Auditing will support this.
- We also want to move towards shorter and more impactful audit reports; Agile Auditing will facilitate this.



What will it involve?

As above, an Agile audit engagement is likely to involve a small team of audit staff as opposed to one individual. This will ensure that the audit proceeds and concludes with greater pace.

Although we are likely to require more frequent interaction with staff in the area we are auditing, the interaction will be quicker and more focussed. We are confident that the overall time required from staff Unrestricted actually be less than through a traditional audit approach.

We will look to discuss any audit findings with staff throughout the stages of the audit. This will ensure that by the time we come to report, we already have agreement to any proposed actions required, and even provide the opportunity for any findings to be actioned prior to the completion of our audit.

What will be the benefits?

- ☑ Ability to provide faster assurance
- ☑ Enhanced ability to add value
- ☑ Audit observations resolved more quickly
- ☑ Shorter, more impactful audit reports
- ☑ Reduced negotiations at audit report start

We hope you support our move towards
Agile Auditing.

If you would like to discuss the concept in more detail, please speak to your SWAP contact.



Unrestricted