# ANNUAL HEAD OF INTERNAL REPORT 2021/22

21 June 2022





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Appendix C



Internal audit – quality assurance and improvement programme



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# **BACKGROUND**

- The work of internal audit is governed by the Public Sector Internal Audit Standards (PSIAS) and the Service's audit charter. These require the Head of Internal Audit to bring an annual report to the Audit Committee. The report must include an opinion on the adequacy and effectiveness of the Service's framework of governance, risk management and control. The report should also include:
  - (a) any qualifications to the opinion, together with the reasons for those qualifications (including any impairment to independence or objectivity)
  - (b) any particular control weakness judged to be relevant to the preparation of the annual governance statement
  - (c) a summary of work undertaken to support the opinion including any reliance placed on the work of other assurance bodies
  - (d) an overall summary of internal audit performance and the results of the internal audit service's quality assurance and improvement programme, including a statement on conformance with the PSIAS.

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### **INTERNAL AUDIT WORK CARRIED OUT IN 2021/22**

- At the beginning of 2021/22, the Service was still recovering from the impact of the Covid-19 pandemic on its working practices and, in some areas, only starting to revert to business as usual. Since then significant (and increasing) resource has been redirected to further taking forward the Enable North Yorkshire priorities.
- The 2021/22 internal audit work programme was formally agreed by the Audit Committee on 16 March 2021. We engaged with officers throughout the year to ensure the programme of work continued to focus on the key risks.
- The results of completed audit work have been reported to the relevant managers, and all reports shared with the s151 officer. A summary of the internal audit reports issued during the year is contained in **annex A**. Three audits have been completed since the last committee and these full reports have been provided to this committee as part of a separate agenda item.
- 5 **Annex B** sets out our current definitions for each assurance level and the priorities for management action.



# FOLLOW UP OF AGREED ACTIONS

- It is important that agreed actions are followed up to ensure that they have been implemented. Veritau has followed up agreed actions during the year taking account of the timescales previously agreed with management for implementation. Our work shows that progress has been made by management during the year to address previously identified control weaknesses.
- In last year's Head of Internal Audit opinion report we highlighted improvements were required for some of the Service's procurement policies and procedures. There had been an inconsistent application of contract regulations and procurement rules and some spending on goods and services in excess of thresholds had not followed the relevant procurement guidance on written quotes or tendering.
- A final limited assurance report was issued in December 2020 with deadlines for completed actions in 2021. In July 2021, the Service's Head of Assets provided this committee with an update on the action plan for addressing the procurement audit findings. The Head of Assets confirmed that 'Veritau are providing on-going monitoring of actions.... and have agreed in principle to a follow up audit. Current thinking is that this should take place around six months after the additional resource commences activity to allow time for some progress to be made, but still leave enough time to advise if the direction of travel is not suitable'.
- In February 2022 we met with the Head of Assets who provided an update on progress. Some work had been done, for example new appointments to procurement roles. The Head of Enable, the s151 officer and others are also involved in developing the wider Service arrangements on procurement. However at this time the actions, as included in the original December 2020 audit report, have not been completed.
- The s151 officer is aware of the extent of progress, and is considering the continued inclusion of this area within the Annual Governance Statement. We agreed with him that no further internal audit work be undertaken in 2021/22. We also noted that an Internal Audit procurement review is planned for July 2022.

# PROFESSIONAL STANDARDS

In order to comply with Public Sector Internal Audit Standards (PSIAS) the Head of Internal Audit is required to develop and maintain an ongoing quality assurance and improvement programme (QAIP). The objective of the QAIP is to ensure that working practices continue to conform to professional standards. The results of the QAIP are reported to the Audit Committee each year as part of the annual report. The QAIP consists of various elements, including:



- maintenance of a detailed audit procedures manual and standard operating practices
- ongoing performance monitoring of internal audit activity
- regular customer feedback
- training plans and associated training and development activities
- periodic self-assessments of internal audit working practices (to evaluate conformance to the standards)
- 12 External assessments must be conducted at least once every five years by a qualified, independent assessor or assessment team from outside the organisation. The most recent external assessment of Veritau internal audit working practices was undertaken in November 2018<sup>1</sup>. This concluded that Veritau internal audit activity generally conforms to the PSIAS<sup>2</sup>.
- The outcome of the recently completed self-assessment demonstrates that the service continues to generally conform to the PSIAS, including the Code of Ethics and the Standards. Further details of the QAIP prepared by Veritau are given in **annex C**.
- 14 The Internal Audit Charter sets out how internal audit will be provided in accordance with the PSIAS. The Charter is reviewed on an annual basis and any proposed changes are brought to the Audit Committee for consideration. No changes are proposed at this time.

# OPINION OF THE HEAD OF INTERNAL AUDIT

- 15 The overall opinion of the Head of Internal Audit on the framework of governance, risk management and control operating at the Service is that it provides Reasonable Assurance. No reliance was placed on the work of other assurance providers in reaching this opinion.
- 16 In giving this opinion attention is drawn to the previous findings on procurement (referred to in paragraphs 7-10 above) which should be considered for inclusion in the 2021/22 Annual Governance Statement.
- 17 The opinion given is based on work that has been undertaken directly by internal audit, and on the cumulative knowledge gained through our ongoing liaison and planning with officers. In giving the opinion, we would note that the Covid-19 pandemic has continued to affect the service over the last year, with a consequential impact on business operations and controls. The work of internal audit has been directed to the areas considered most at risk, or that offer the most value for the Service overall. However, not all the areas affected by the Covid-19 pandemic will have been reviewed.

<sup>&</sup>lt;sup>2</sup> PSIAS guidance suggests a scale of three ratings, 'generally conforms, 'partially conforms' and 'does not conform'. 'Generally conforms' is the top rating.



<sup>&</sup>lt;sup>1</sup> Reported to the Audit Committee in March 2019

## **APPENDIX A: 2021/22 INTERNAL AUDIT WORK**

| Audit                       | Reported to Committee | Assurance Level      |  |
|-----------------------------|-----------------------|----------------------|--|
| Risk Management – follow up | June 2022             | No opinion given     |  |
| ICT Asset Management        | June 2022             | Reasonable Assurance |  |
| Health and Safety           | June 2022             | Reasonable Assurance |  |
| Bank Mandate procedures     | March 2022            | No opinion given     |  |
| Policies and procedures     | March 2022            | Limited Assurance    |  |
| Payroll – controls review   | January 2022          | Reasonable Assurance |  |
| HR Discipline and Grievance | September 2021        | Reasonable Assurance |  |
| Payroll – data changes      | July 2021             | No opinion given     |  |
| Tranman and AMS System      | July 2021             | Reasonable Assurance |  |

#### Other work

Internal audit work has been undertaken in a number of other areas during the period, including those listed below.

- Follow up of agreed actions.
- Collation and review of various sources of evidence (e.g. from committee papers and minutes and the risk register) to help support our assessment of the Service's governance, risk management and control arrangements.
- Support and advice, for example on areas such as payment controls



### APPENDIX B: AUDIT OPINIONS AND PRIORITIES FOR ACTIONS

# **Audit opinions**

Our work is based on using a variety of audit techniques to test the operation of systems. This may include sampling and data analysis of wider populations. It cannot guarantee the elimination of fraud or error. Our opinion relates only to the objectives set out in the audit scope and is based on risks related to those objectives that we identify at the time of the audit. Our overall audit opinion is based on 4 grades of opinion, as set out below.

| Opinion               | Assessment of internal control   |  |
|-----------------------|--|--|
| Substantial assurance | A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.  |  |
| Reasonable assurance  | There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.                     |  |
| Limited assurance     | Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control, to effectively manage risks to the achievement of objectives in the area audited.                      |  |
| No assurance          | Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited. |  |

<sup>\*</sup>There are circumstances when it is not appropriate to give an opinion/assurance level on completed work, for example on project and other support, consultancy, grant certification and follow up work. When 'no opinion' is our conclusion this is not to be confused with a no assurance opinion.

| Priorities for actions |  |  |  |
|------------------------|--|--|--|
| Priority 1             | A fundamental system weakness, which presents unacceptable risk to the system objectives and requires urgent attention by management         |  |  |
| Priority 2             | A significant system weakness, whose impact or frequency presents risks to the system objectives, which needs to be addressed by management. |  |  |
| Priority 3             | The system objectives are not exposed to significant risk, but the issue merits attention by management.                                     |  |  |



# ANNEX C: INTERNAL AUDIT - QUALITY ASSURANCE AND IMPROVEMENT PROGRAMME

### 1.0 Background

### Ongoing quality assurance arrangements

Veritau maintains appropriate ongoing quality assurance arrangements designed to ensure that internal audit work is undertaken in accordance with relevant professional standards (specifically the Public Sector Internal Audit Standards). These arrangements include:

- ▲ the maintenance of a detailed audit procedures manual
- ▲ the requirement for all audit staff to conform to the Code of Ethics and Standards of Conduct Policy
- ▲ the requirement for all audit staff to complete annual declarations of interest
- ▲ detailed job descriptions and competency profiles for each internal audit post
- regular performance appraisals
- ▲ regular 1:2:1 meetings to monitor progress with audit engagements
- ▲ induction programmes, training plans and associated training activities
- attendance on relevant courses and access to e-learning material
- ▲ the maintenance of training records and training evaluation procedures
- membership of professional networks
- agreement of the objectives, scope and expected timescales for each audit engagement with the client before detailed work commences (audit specification)
- ▲ the results of all audit testing and other associated work documented using the company's automated working paper system (Sword Audit Manager)
- ▲ file review by senior auditors and audit managers and sign-off at each stage of the audit process
- ▲ the ongoing investment in tools to support the effective performance of internal audit work (for example data interrogation software)
- post audit questionnaires (customer satisfaction surveys) issued following each audit engagement
- performance against agreed quality targets monitored and reported to each client on a regular basis
- regular client liaison meetings to discuss progress, share information and evaluate performance

On an ongoing basis, samples of completed audit work are subject to internal peer review by a Quality Assurance group. The review process is designed to ensure audit work is completed consistently and to the required quality standards. The work of the Quality Assurance group is overseen by an Assistant Director. Any key learning points are shared with the relevant internal auditors



and audit managers. The Head of Internal Audit will also be informed of any general areas requiring improvement. Appropriate mitigating action will be taken where required (for example, increased supervision of individual internal auditors or further training).

### Annual self-assessment

On an annual basis, the Head of Internal Audit will seek feedback from each client on the quality of the overall internal audit service. The Head of Internal Audit will also update the PSIAS self-assessment checklist and obtain evidence to demonstrate conformance with the Code of Ethics and the Standards. As part of ongoing performance management arrangements, each internal auditor is also required to assess their current skills and knowledge against the competency profile relevant for their role. Where necessary, further training or support will be provided to address any development needs.

The Head of Internal Audit is also a member of various professional networks and obtains information on operating arrangements and relevant best practice from other similar audit providers for comparison purposes.

The results of the annual client survey, PSIAS self-assessment, professional networking, and ongoing quality assurance and performance management arrangements are used to identify any areas requiring further development and/or improvement. Any specific changes or improvements are included in the annual Improvement Action Plan. Specific actions may also be included in the Veritau business plan, internal audit strategy action plan, and/or individual personal development action plans. The outcomes from this exercise, including details of the Improvement Action Plan are also reported to each client. The results will also be used to evaluate overall conformance with the PSIAS, the results of which are reported to senior management and the board<sup>3</sup> as part of the annual report of the Head of Internal Audit.

#### External assessment

At least once every five years, arrangements must be made to subject internal audit working practices to external assessment to ensure the continued application of professional standards. The assessment should be conducted by an independent and suitably qualified person or organisation and the results reported to the Head of Internal Audit. The outcome of the external assessment also forms part of the overall reporting process to each client (as set out above). Any specific areas identified as requiring further development and/or improvement will be included in the annual Improvement Action Plan for that year.

#### 2.0 Customer Satisfaction Survey 2022

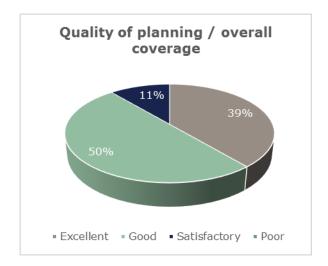
In March 2022 we asked clients for feedback on the overall quality of the internal audit service provided by Veritau. Where relevant, the survey also asked questions about counter fraud and information governance services. A total of



<sup>&</sup>lt;sup>3</sup> As defined by the relevant audit charter.

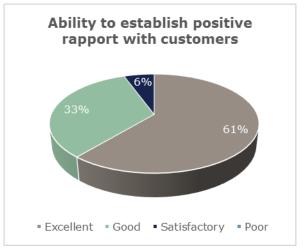
154 surveys (2021 – 165) were issued to senior managers in client organisations. A total of 19 responses were received representing a response rate of 12% (2021 – 12%). The surveys were sent using Smart Survey (an online survey tool) and the respondents were required to identify who they were. Respondents were asked to rate the different elements of the audit process as either excellent, good, satisfactory or poor.

Respondents were also asked to provide an overall rating for the service. The results of the survey are set out in the charts below. These are presented as percentages, for consistency with previous years. However, it is recognised that the low number of respondents means that the percentage for each category is sensitive to small changes in actual responses (1 respondent represents about 5%).

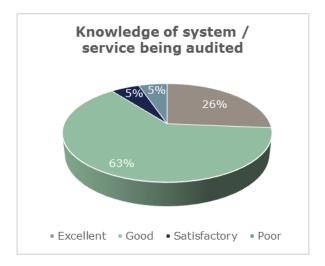


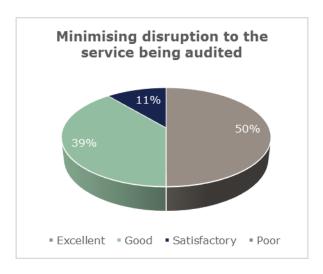


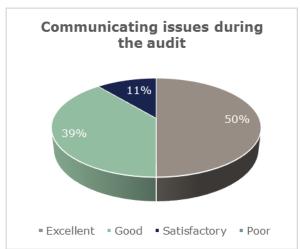




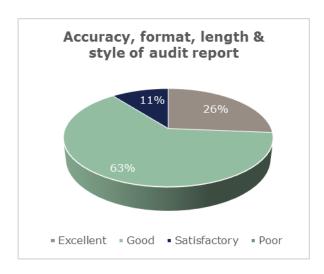


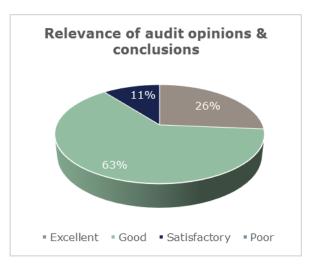














The overall ratings in 2022 were:

|              | 2022 |     | 2021 |     |
|--------------|------|-----|------|-----|
| Excellent    | 9    | 47% | 11   | 58% |
| Good         | 9    | 47% | 6    | 32% |
| Satisfactory | 1    | 5%  | 0    | 0%  |
| Poor         | 0    | 0%  | 2    | 11% |

The feedback shows that the majority of respondents continue to value the service being delivered.

#### 3.0 Self-Assessment Checklist 2022

CIPFA has prepared a detailed checklist to enable conformance with the PSIAS and the Local Government Application Note to be assessed. The checklist was originally completed in March 2014 and has since been reviewed and updated annually. Documentary evidence is provided where current working practices are considered to fully or partially conform to the standards. A comprehensive update of the checklist was undertaken in 2020, following revisions by CIPFA.

Current working practices are considered to be at standard. However, as in previous years there are a few areas of non-conformance. These areas are mostly as a result of Veritau being a shared service delivering internal audit to a number of clients as well as providing other related governance services. None of the issues identified are considered to be significant. Existing arrangements are considered appropriate for the circumstances and require no further action.

The following table shows areas of non-compliance. These remain largely unchanged from last year, although one area has been removed from the table. This related to whether risk based plans set out the respective priority of audit work. New flexible planning arrangements introduced mean that working practices now comply with the standards in this area.



| Conformance with Standard  | Current Position  |
|--|---|
| Where there have been significant additional consulting services agreed during the year that were not already included in the audit plan, was approval sought from the audit committee before the engagement was accepted? | Consultancy services are usually commissioned by the relevant client officer (generally the s151 officer). The scope (and charging arrangements) for any specific engagement will be agreed by the Head of Internal Audit and the relevant client officer. Engagements will not be accepted if there is any actual or perceived conflict of interest, or which might otherwise be detrimental to the reputation of Veritau. |
| Are consulting engagements that have been accepted included in the riskbased plan?   | Consulting engagements are commissioned and agreed separately.  |
| Does the risk-based plan include the approach to using other sources of assurance and any work that may be required to place reliance upon those sources?  | An approach to using other sources of assurance, where appropriate is currently being developed (see below).  |

#### 4.0 External Assessment

As noted above, the PSIAS require the Head of Internal Audit to arrange for an external assessment to be conducted at least once every five years to ensure the continued application of professional standards. The assessment is intended to provide an independent and objective opinion on the quality of internal audit practices.

An external assessment of Veritau internal audit working practices was last undertaken in November 2018 by the South West Audit Partnership (SWAP). SWAP is a not for profit public services company operating primarily in the South West of England. As a large shared service internal audit provider it has the relevant knowledge and expertise to undertake external inspections of other shared services and is independent of Veritau.

The assessment consisted of a review of documentary evidence, including the self-assessment, and face to face interviews with a number of senior client officers and Veritau auditors. The assessors also interviewed audit committee chairs.



The report concluded that Veritau internal audit activity generally conforms to the PSIAS<sup>4</sup> and, overall, the findings were very positive. The feedback included comments that the internal audit service was highly valued by its member councils and other clients, and that services had continued to improve since the last external assessment in 2014.

### 5.0 Improvement Action Plan

Overall, internal audit services provided by Veritau continue to meet the requirements of the Public Sector Internal Audit Standards. However, we recognise that the pace of change in local government and the wider public sector mean that we need to update aspects of the service to ensure it stays up to date and continues to deliver good value.

Between autumn 2020 and autumn 2021, Veritau undertook a fundamental review of internal audit practices. This resulted in the development of a new three year strategy which details how we will improve the internal audit service for our clients. The strategy sets out the actions we will be taking within Veritau to modernise our practices, from 2021 to 2024. The five key areas we are focusing on are:

- increasing engagement across all clients; to improve communication and ensure we understand what represents good value and where internal audit work should be focussed
- ▲ further development of strategic planning frameworks; focussing on further development of assurance mapping arrangements and other activities that help us ensure we provide assurance in the right areas at the right time
- redesign and modernisation of audit processes; to ensure we can respond quickly as priorities change, reduce time to deliver findings and manage resources efficiently
- ▲ increasing investment in high value data analytics work; shifting the focus of work towards a data driven model that provides wider assurance in real time
- ▲ introducing better measures of outcomes from audit work, to enable us to direct resources to areas of most value to our clients.

Strategy focus area 2 includes further development of assurance mapping arrangements. This is an outstanding issue from previous improvement plans. We are currently undertaking a pilot assurance mapping exercise in partnership with officers at one of our key clients. The lessons learnt from this will be used to further develop processes to be rolled out as part of our core internal audit service. Completion of actions in this area will further reduce the areas of non-conformance with the standards (section 3 above).

In the 2020/21 QAIP we reported on the findings from the last Quality Assurance Group review, focussed on the follow up of agreed actions. The findings have been finalised and a programme of work is underway to improve these processes. This includes updates to processes (including integration with client risk management systems where appropriate), a full review of all outstanding

<sup>&</sup>lt;sup>4</sup> PSIAS guidance suggests a scale of three ratings, 'generally conforms', 'partially conforms' and 'does not conform'. 'Generally conforms' is the top rating.



actions across all clients, and further training for all auditors. This work will be completed in 2022/23.

A further review by the group in 2021/22 focussed on the consistency of opinions given for individual audit assignments. This follows the adoption of a revised four level opinion framework introduced in 2020/21, in accordance with recommendations from Cipfa. It was found that in almost all cases the opinions given on completed work was consistent with the guidance contained in the Veritau audit manual, and supported by the number and priority of actions. Auditors continue to use the guidance and professional judgement when forming conclusions on individual pieces of work. We will feedback and discuss the wider findings as part of auditor training in 2022/23.

# 6.0 Overall Conformance with PSIAS (Opinion of the Head of Internal Audit)

Based on the results of the quality assurance process I consider that the service generally conforms to the Public Sector Internal Audit Standards, including the *Code of Ethics* and the *Standards*.

The guidance suggests a scale of three ratings, 'generally conforms, 'partially conforms' and 'does not conform'. 'Generally conforms' is the top rating and means that the internal audit service has a charter, policies and processes that are judged to be in conformance to the Standards.

