



Report of the Chief Auditor

Governance and Audit Committee – 28 February 2024

Internal Audit Annual Plan Methodology

Purpose:	This report provides a briefing to the Governance and Audit Committee on the methodology used to prepare the Internal Audit Annual Plan in advance of the Draft Internal Audit Annual Plan 2024/25 being reported to the Committee.
Policy Framework:	None
Consultation:	Legal, Finance, Access to Services
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For Information	

1. Introduction

- 1.1 The Public Sector Internal Audit Standards (PSIAS) provide a framework for the delivery of a professional, independent and objective internal audit service and are mandatory for all internal audit providers in the public sector in the UK.
- 1.2 One of the requirements of the PSIAS is that an annual risk-based Internal Audit Plan must be prepared to determine the priorities of Internal Audit and to ensure they are consistent with the Council's goals. The Plan must allow sufficient audit coverage across the whole Council for the Chief Auditor to be able to provide an annual opinion to Council via the Section 151 Officer and the Governance and Audit Committee on the control environment covering corporate governance, risk management and internal control.

- 1.3 The Audit Plan should ensure that resources are targeted at the areas of the Council's work where it can provide most benefit by providing assurance over key risks and controls.
- 1.4 The Standards state that the Internal Audit Annual Plan must be discussed with senior management which in the Internal Audit Charter is defined as the Corporate Management Team before being reported to the Governance and Audit Committee for approval.
- 1.5 The draft version of the annual plan for 2024/25 will be reported to the Corporate Management Team for consultation prior to it being presented to the Governance and Audit Committee.
- 1.6 This report provides a briefing on the methodology used to prepare the Annual Plan in advance of the draft Plan for 2024/25 being reported to the Committee.
- 1.7 As reported in the Internal Audit Quarterly Monitoring reports that have been presented to the Audit Committee throughout 2023/24, the team has seen high levels of sickness absence as well as a period where there have been vacant posts in the team. This has had an impact on the team's ability to deliver some of the audits originally included in the audit plan for 2023/24. As a result, it is anticipated that a number of audits that were originally planned to be completed in 2023/24 may have to be carried forward to 2024/25.

2. Internal Audit Plan Methodology

- 2.1 The requirement to produce an Internal Audit Annual Plan is included in the PSIAS which are mandatory for all internal audit providers in the UK public sector.
- 2.2 An extract of the PSIAS requirements regarding internal audit planning is attached in Appendix 1.
- 2.3 The starting point for a risk-based audit approach is gaining an understanding of the Council's objectives and goals as well as the current key risks faced by the Council as recorded in the Risk Registers.
- 2.4 Information is gathered from a number of sources prior to the preparation of the detailed Audit Plan including:
 - Corporate and Directorate Risk Registers.
 - Areas of concern or request for audit coverage from management, Corporate Management Team, Heads of Service or the Audit Committee.
 - The Assurance Map which details other sources of assurance available both from internal and external sources.
 - Any recent or proposed significant changes to the Council's systems or operations.

- Previous audit results and Internal Audit's cumulative knowledge of systems and procedures across the Council.
- 2.5 A diagram that illustrates the internal audit annual planning process can be found in Appendix 2.
- 2.6 A risk assessment is undertaken for each audit which is used to determine the expected frequency of the review as part of the standard audit rolling programme. The risk assessment takes account of a wide range of factors which are grouped into the following categories:
- Materiality e.g. income, expenditure.
 - Control Environment/Vulnerability e.g. previous frauds, staff turnover.
 - Management Concerns e.g. direct request for help, potential for embarrassment.
 - Sensitivity e.g. impact on service, effect on Council's welfare.
- 2.7 The outcome of the risk assessment is a risk index which is then used to determine the frequency of audit visits as shown in the following table:

Risk Index	Risk Factor	Frequency of Visit
0 – 19	Low	5 years
20 – 25	Medium/Low	4/5 years
26 – 40	Medium	3 years
41 – 49	Medium/High	2/3 years
50 +	High	1/2 years

- 2.8 In addition to the risk assessment process, a number of systems have traditionally been identified as fundamental e.g. Employee Services, Accounts Receivable, Main Accounting, Council Tax. The fundamental audits are those systems that are considered to be most significant to the achievement of the Council's objectives. From 2014/15, a risk-based approach was taken to determine the required frequency of these audits. Any audits which had received the highest level of assurance for 3 consecutive years were moved to a 2-year cycle with audits receiving a lower assurance rating being completed annually. From 2023/24 we revised the planned timetable for the fundamental audits, as summarised below:
- i) Fundamental audits that receive a High Assurance rating are moved to a two-year audit cycle, with a full audit being completed every two years.
 - ii) Fundamental audits that receive a Substantial Assurance rating are moved to a two-year audit cycle, with a full audit being completed every two years. In addition to this a follow-up audit will be completed in the first year to re-test all Medium and/or High-Risk recommendations.

iii) Fundamental audits that receive a Moderate Assurance rating remain on an annual audit cycle, with a full audit being completed every year.

- 2.9 A number of audits are undertaken on an annual basis rather than by the determination of risk e.g. grant certification audits where the work is required under the terms and conditions of the grant, the review of debts due to be written off, services where significant amounts of cash are handled, etc.
- 2.10 The use of the risk assessment process provides every audit in the Council's audit universe with a rolling audit programme which is also considered when developing the Audit Plan.
- 2.11 Each year, a Consultation Exercise is held with all Heads of Service and the Corporate Management Team, giving them the opportunity to comment on the audit coverage in their areas and to ensure that all risks within their services have been identified. Heads of Service may also request specific reviews or pieces of work to be undertaken by the Internal Audit Section which will add value to their service. All requests are considered in light of the total Internal Audit resources available.
- 2.12 The Consultation Exercise for the 2024/25 Audit Plan commenced in November 2023 and has seen a number of updates to the full list of audits across the entire Council, known as the 'Audit Universe'.
- 2.13 In order to demonstrate the linkage between the annual plan for 2024/25 and the Council's Corporate Priorities, the Consultation Exercise also included discussions with Heads of Service to determine which of the Corporate Priorities they felt the services in their areas most closely mapped to. Whilst it is acknowledged that some service areas could map to a number of different Corporate Priorities.
- 2.14 As requested by Committee, the 2024/25 Audit Plan will reflect this mapping so that Members are able to identify the link between the Plan and the Objectives of the Council. The links between the Corporate Priorities, Service Areas, the Audit Plan and the Annual Governance Statement are demonstrated in the illustration in Appendix 3.
- 2.15 Whilst the 2024/25 audit plan is currently being considered, it is envisaged that as in previous years the planned audits will be grouped in the following broad categories:
- **Council Governance & Control Audits** – cross-cutting reviews.
 - **Fundamental Audits** – aimed at providing Section 151 Officer and Monitoring Officer Assurance.
 - **Service Specific Audits** – aimed at providing other assurance, linked to the Corporate Priorities and as a result of the audit planning and consultation process and in line with the usual audit rolling programme.

- 2.16 Historically, a review of the Corporate and Directorate Risk Registers has also taken place as part of the audit planning process to ensure that where necessary, Internal Audit resources are targeted at the areas considered to be the highest risk. This has also been the case for the 2024/25 Audit Plan.
- 2.17 In addition to this, it was recommended as part of the PSIAS peer review that an assurance mapping exercise should be carried out to inform the audit planning process. This exercise has been completed, with the Assurance Map being updated in consultation with the Risk Owners and the Corporate Management Team.
- 2.18 The updated Assurance Map can be found in Appendix 4, together with a brief narrative explaining the process. The results of this exercise have also be taken into consideration when compiling the 2024/25 Audit Plan.
- 2.19 The ongoing review of the current year's audit plan also informs the planning process e.g. by identifying any emerging risks, new systems, developments or special investigations which may have a wider impact.
- 2.20 The risk assessment process and rolling programme, consultation exercise and review of the risk registers will provide the total number of audit days required in the Audit Plan for 2024/25 which then has to be matched against the audit resources available.
- 2.21 The audit resources available in 2024/25 is 9.1 full time equivalents excluding the Chief Auditor, unchanged from 2023/24.
- 2.22 The audit resources available have to allow for things such as annual leave, public holidays, training, administration, audit planning, sickness and a contingency to allow for unplanned or ad hoc work. This provides the productive audit days available to deliver the audit programme.
- 2.23 Inevitably, the required audit coverage will exceed the available audit resources leading to a further review of the required audit coverage. This review will again be risk based to ensure that the areas of greatest perceived risk are prioritised in consultation with the Director of Finance and the senior staff within the internal audit team.
- 2.24 The Internal Audit Annual Plan is reported to the Corporate Management Team and the Governance and Audit Committee at the start of each year for approval. However, the Annual Plan must remain a flexible document that reacts to changing risks and priorities over the course of the year. Updates are provided to the Governance and Audit Committee throughout the year via the Chief Auditors Monitoring Reports.

3 Integrated Assessment Implications

3.1 The Council is subject to the Equality Act (Public Sector Equality Duty and the socio-economic duty), the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language (Wales) Measure, and must in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Acts.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Deliver better outcomes for those people who experience socio-economic disadvantage
- Consider opportunities for people to use the Welsh language
- Treat the Welsh language no less favourably than English.
- Ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

3.2 The Well-being of Future Generations (Wales) Act 2015 mandates that public bodies in Wales must carry out sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the 'well-being goals'.

3.3 Our Integrated Impact Assessment (IIA) process ensures we have paid due regard to the above. It also takes into account other key issues and priorities, such as poverty and social exclusion, community cohesion, carers, the United Nations Convention on the Rights of the Child (UNCRC) and Welsh language.

3.4 The completion of the Integrated Impact Assessment Screening revealed that:

- The Internal Audit Annual Plan Methodology Report has a low positive impact across all groups.
- It has been subject to consultation with the Director of Finance & S151 Officer, Legal, Access to Services and the Corporate Management Team.
- All Well-being of Future Generations Act considerations are positive and any risks identified are low.
- The overall impact of the Internal Audit Annual Plan Methodology Report is positive as it will support the Authority in its requirement to protect public funds.

4. Financial Implications

4.1 There are no financial implications associated with this report.

5. Legal Implications

5.1 There are no legal implications associated with this report.

Background Papers: None.

Appendices: Appendix 1 – Extract from Public Sector Internal Audit Standards
Appendix 2 – Internal Audit Annual Planning Process
Appendix 3 – Audit Plan Mapped Against Corporate Priorities
Appendix 4 – City & County of Swansea Assurance Map
Appendix 5 – Integrated Impact Assessment Screening Form

Extract from Public Sector Internal Audit Standards

2010 Planning

The chief audit executive must establish risk-based plans to determine the priorities of the internal audit activity, consistent with the organisation's goals.

Interpretation:

To develop the risk-based plan, the chief audit executive consults with senior management and the board and obtains an understanding of the organisation's strategies, key business objectives, associated risks and risk management processes. The chief audit executive must review and adjust the plan, as necessary, in response to changes in the organisation's business, risks, operations, programmes, systems, and controls.

Public sector requirement

The risk-based plan must take into account the requirement to produce an annual internal audit opinion and the assurance framework. It must incorporate or be linked to a strategic or high-level statement of how the internal audit service will be delivered and developed in accordance with the internal audit charter and how it links to the organisational objectives and priorities.

2010.A1

The internal audit activity's plan of engagements must be based on a documented risk assessment, undertaken at least annually. The input of senior management and the board must be considered in this process.

2010.A2

The chief audit executive must identify and consider the expectations of senior management, the board and other stakeholders for internal audit opinions and other conclusions.

2010.C1

The chief audit executive should consider accepting proposed consulting engagements based on the engagement's potential to improve management of risks, add value and improve the organisation's operations. Accepted engagements must be included in the plan.

2020 Communication and Approval

The chief audit executive must communicate the internal audit activity's plans and resource requirements, including significant interim changes, to senior management and the board for review and approval. The chief audit executive must also communicate the impact of resource limitations.

2030 Resource Management

The chief audit executive must ensure that internal audit resources are appropriate, sufficient and effectively deployed to achieve the approved plan.

Interpretation:

Appropriate refers to the mix of knowledge, skills and other competencies needed to perform the plan. Sufficient refers to the quantity of resources needed to accomplish the plan. Resources are effectively deployed when they are used in a way that optimises the achievement of the approved plan.

Public sector requirement

The risk-based plan must explain how internal audit's resource requirements have been assessed.

Where the chief audit executive believes that the level of agreed resources will impact adversely on the provision of the annual internal audit opinion, the consequences must be brought to the attention of the board.