

PERTH AND KINROSS COUNCIL

Audit Committee

22 July 2020

INTERNAL AUDIT ANNUAL REPORT 2019/20

Report by the Chief Internal Auditor (Report No. 20/120)

PURPOSE OF REPORT

This report presents the year-end report and audit opinion of the Chief Internal Auditor for 2019/20, as set out in Section 7.

1. BACKGROUND / MAIN ISSUES

- 1.1 The Public Sector Internal Audit standards (PSIAS) require the Chief Internal Auditor to provide an annual opinion which must conclude on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control. The report must incorporate the opinion, a summary of the work that supports this opinion, a statement on conformance with the PSIAS and the results of the quality assurance and improvement programme. This report fulfils this requirement.
- 1.2 Internal Audit is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. In accordance with the PSIAS, it helps the council accomplish its objectives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control and governance processes.
- 1.3 Perth & Kinross Council's internal controls include the full range of policies, procedures and practices intended to ensure the proper conduct of its operations and the achievement of its objectives. They include processes and procedures, organisational structures, job descriptions, authorisation limits, management supervision, risk management processes, reports and decisions.
- 1.4 It is the responsibility of management to devise, implement and maintain appropriate controls over the activities for which they are responsible. The role of Internal Audit is to provide an opinion to the Council as to the effectiveness of the controls that have been put in place by management in order to ensure that the organisation achieves its objectives. Internal Audit is thus a key part of the process by which the Council ensures the management of the risks that threaten the achievement of its objectives.
- 1.5 Internal Audit's work is planned in such a way as to take account of these risks. Prioritising work towards the areas of highest assessed risk enables the

Council to identify and remedy the most material weaknesses in its framework of internal controls.

- 1.6 In line with the PSIAS, Internal Audit undertakes a process of planning resulting in an annual plan. This plan was presented partly in themes, with many themes cutting across Services. This represented a new approach to targeting the key risks identified as part of the Council's Risk Management processes, details of which were provided to the Audit Committee in June 2019 (report [19/196](#)). In this respect, the Internal Audit Plan for 2019/20 was able to more closely align with the Council's risk management arrangements.
- 1.7 For 2019/20, the report containing Internal Audit's planned workload was considered and approved in June 2019 (report [19/195](#)). All Perth & Kinross Council's activities are reviewed as part of the planning process. The plan for 2019/20 aimed to cover the most significant areas of risk within the resources available whilst ensuring that there was a balance of coverage for all Service areas.
- 1.8 This report summarises the audit work carried out in 2019/20 and presents the Chief Internal Auditor's opinion on the effectiveness of the Council's internal control environment for that year.
- 1.9 This report does not reflect work undertaken in response to the management of arrangements to ensure the delivery of critical service during the COVID 19 pandemic. Assurance work surrounding this area, and the Council's exposure to risk and fraud as a result, will be included within the Internal Audit Plan for 2020/21.

2. INTERNAL AUDIT'S WORK IN 2019/20

- 2.1 This section presents an overview of Internal Audit's work during 2019/20 in its role as independent reviewer of the Council's systems of internal control.
- 2.2 The Internal Audit Plan approved in June 2019 included 17 planned internal audit assignments for Perth & Kinross Council. Of these, 12 were assurance audits and 4 were consultancy / enabling assignments. In addition, resources were included within the Plan to provide an Internal Audit service for the Perth & Kinross Health & Social Care Partnership's Integrated Joint Board and to certify a grant claim within the year.
- 2.3 All planned assignments, covering the period from April 2019 to March 2020, have been undertaken. Due to the Council directing its efforts to providing essential services in connection with COVID 19, some assignments have yet to be finalised and reported. These reports will be reviewed and considered at the earliest possible opportunity. Outcomes from these assignments are reflected within this report, where appropriate.
- 2.4 Some assignments, by their nature or as a result of revised priorities arising from the Council's response to the COVID 19 pandemic, will continue into 2020/21. This may also be due to their being consultancy over projects which

extend beyond one financial year. These assignments will be included in work-plans for 2020/21.

- 2.5 Work has concluded and reported as appropriate for 13 of the 17 planned assignments. This represents 76% of planned work. Work has been fully completed for 2 of the remaining assignments and the reports are in the process of being agreed with Services, however priorities have been re-directed at this time. The outcomes from all work, reported or otherwise, has been taken into consideration when arriving at the Opinion, as recorded in Section 7 of this report.
- 2.6 Unplanned assignments, as a result of investigations or additional requests from Services, have been undertaken during the year. Where appropriate, control issues highlighted as a result of this work are reported to the Audit Committee.
- 2.7 Internal Audit has been contacted on 31 occasions for advice / guidance during the year. This is a significant increase in contacts of this nature and is to be welcomed. Whilst the majority of these do not require significant resource to complete, Internal Audit's ability to influence the control environment from the outset of changes is to be welcomed and is a sign of an increasingly risk- and control-aware environment within the Council. A small number of these contacts have been as a result of changes to the control environment which arise out of the response to COVID-19 and these will inform Internal Audit work for 2020-21.
- 2.8 The results detailed in this report relate to all audit reports issued relating to Internal Audit's work during the period from April 2019 to March 2020, both planned and unplanned.
- 2.9 All findings detailed within the reports issued during the year were accepted by management. These reports contain a total of 61 agreed actions, compared with 55 actions in 2018/19. The table below details the rating of the importance of these actions. The figures in brackets relate to the rating of individual actions for the financial year 2018/19:

Critical Risk	0 (0) agreed actions
High Risk	22 (7) agreed actions
Medium Risk	33 (40) agreed actions
Low Risk	6 (8) agreed actions

- 2.10 This represents an increase in the proportion of high-risk actions from 13% in 2018/19 to 36% in 2019/20. There is a corresponding decrease in the proportion of medium and low-risk actions from 73% and 14% respectively in 2018/19 to 54% and 10%. As in the previous 3 years, there were no actions arising of a critical nature.

- 2.11 It should be noted that these figures do not include outcomes from the report arising from work undertaken in relation to Horsecross Arts during the year.
- 2.12 Appendix A shows a summary of Internal Audit's work for Perth & Kinross Council during 2019/20 compared with the original plan as approved by the Audit Committee in June 2019 along with the current status of each assignment. Internal Audit was involved with 49 assignments consisting of 17 planned audit and consultancy assignments, a grant certification, 31 pieces of unplanned work / requests for advice.
- 2.13 Internal Audit continues to work closely with the Head of Legal and Governance Services to support services to embed effective risk management into their day to day business activities.

Areas for Significant Improvement in Controls

- 2.14 During 2019/20, each audit report was assigned an overall rating, summarising the strength of internal controls in the area under review. These ratings were intended to provide a guide to management in setting priorities for action and to inform the Audit Committee in their scrutiny role. There has been one area where controls have been assessed as 'weak' and three areas where controls have been described as 'moderately weak' compared with no 'weak' and one 'moderately weak' area in 2018/19. There are no areas where controls have been described as 'unacceptably weak'.
- 2.15 Issued reports during this period contain an assessment of the control environment for a total of 18 control objectives. This compares with 26 control objectives assessed during 2018/19 and the reduction is largely down to the thematic approach adopted for assignments. These assessments of control at the time audits took place are broken down as follows, with the relevant figures for 2018/19 being recorded in brackets:

Strong	6 (9) Control Objectives
Moderately Strong	3 (9) Control Objectives
Moderate	5 (7) Control Objectives
Moderately Weak	3 (1) Control Objectives
Weak	1 (0) Control Objectives
Unacceptably Weak	0 (0) Control Objectives

- 2.16 Overall, this represents a similar position in terms of the proportion of strong- and moderately strong-rated control objectives over the two years. There has been an increase in the proportion of moderately weak and weak-rated control objectives, these being 17% and 5% for 2019/20 compared with 4% and 0% for 2018/19. There was a corresponding decrease in the proportion of moderately strong-rated control objectives from 35% in 2018/19 to 17% in 2019/2020.

- 2.17 As at 2.11 above, the outcomes from the report on Horsecross Arts have not been included within this summary.

Horsecross Arts

- 2.18 Internal Audit has maintained an overview of developments with the management of the relationship with Horsecross during the year. As detailed within the report, Audit Glasgow undertook a review of Financial Management and Internal Audit will have a role in ensuring that the Council is satisfied that appropriate action is taken by the Board to address the concerns within this report.

Follow Up of Action Plans

- 2.19 The responsibility for considering (and accepting or rejecting) Internal Audit's findings rests with management. Final audit reports record the agreed plan of action, including the individual(s) responsible; the planned timescales for completion; and the evidence required by Internal Audit to verify completion of the action. The audit process is of little value unless action is taken to remedy deficiencies in internal control where these are identified. Hence, a significant part of Internal Audit's role is the following-up of progress with these action plans in line with the requirements of the Public Sector Internal Audit Standards.
- 2.20 A database for recording agreed actions is maintained for this purpose. Services are routinely requested to provide the agreed evidence of completion for actions which are due to have been completed. Where actions have not been completed, an update on progress is requested along with the reason for non-completion and a revised date for completion. The Audit Committee is informed of all actions which have not been completed, along with an Internal Audit opinion on the acceptability or otherwise of the response received from management.
- 2.21 The support of the Chief Executive, Depute Chief Executive, Executive Directors and Senior Management Teams in ensuring that agreed actions are completed has continued during the year.
- 2.22 Due to the impact of COVID-19, it has not been possible to verify the status of actions due for completion in February and March 2020. Of the 61 actions agreed with management (see 2.9 above) 37 had a completion date within 2019/20. 24 actions had a completion date of February and March and had not been subject to follow up by Internal Audit prior to the revised arrangements in place as a result of COVID 19. It has therefore not been possible to follow these actions up in time for the compilation of this report. Of these 13 remaining actions due for completion within the year, all have been verified by Internal Audit as having been completed.
- 2.23 As recovery and renewal commences within Services, Internal Audit will ensure that outstanding actions are reviewed to ensure that they remain relevant and are completed as appropriate.

2.24 In the Chief Internal Auditor's opinion, the procedures in place provide a sound basis for ensuring that progress against the agreed plans is exposed to the proper level of scrutiny.

3 THE AUDIT COMMITTEE

3.1 The Audit Committee operates within an approved 'Role and Remit' and, as a formally constituted Committee of the Council. The Committee conducts its meetings in public, with its meetings routinely recorded and available to view via a link from the Committee's webpage, thus ensuring a high degree of accountability for its activities.

4 RESOURCES

4.1 Internal Audit's budget for 2019/20 was £216,989 whilst the actual expenditure is £193,621. This underspend is primarily due to slippage in staffing within the year, however this has not impacted on the delivery of planned Internal Audit work.

4.2 Recent trends in internal audit staffing are as shown below:

	April 2018		April 2019		April 2020	
	No. (FTE)		No. (FTE)		No. (FTE)	
Qualified Staff	1.7	37%	2.7	44%	2.0	50%
Studying towards a qualification	0	0%	0	0%	1.0	25%
Qualified by experience	2.2	63%	2.0	56%	1.0	25%
Total	3.9	100%	4.7	100%	4.0	100%

5 ANTI-FRAUD ACTIVITY

5.1 The responsibility for preventing and detecting fraud and corruption rests with management; it is the responsibility of management to take into account the risks arising from fraud and corruption and to devise and maintain the appropriate internal controls to provide a reasonable level of assurance that the Council's resources are being protected from loss and misappropriation.

5.2 Nevertheless, Internal Audit has a number of responsibilities regarding the Council's anti-fraud and anti-corruption arrangements. The year 2019/20 saw a moderate level of audit activity in this area as described below.

The National Fraud Initiative

5.3 The National Fraud Initiative (NFI) is a large-scale 'data-matching' exercise that takes place every two years and takes place over two financial years. Perth & Kinross Council is participating in the 2018/19 exercise. The NFI involves the comparison of personal data held by public authorities in order to

identify anomalies that may indicate fraud or error. This output then forms the basis for a process of investigation within each authority, in order to ensure that errors are recognised and corrected and that, where cases of possible fraud are identified, they are pursued appropriately.

- 5.4 This investigative process, which is driven by Audit Scotland, is co-ordinated by Internal Audit and includes overseeing Services' arrangements for uploading the data securely and the checking of a sample of identified anomalies within the period of the exercise, on the basis of an assessment of risk. Internal Audit facilitates the reporting of progress to our External Auditors, KPMG. There has been an allocation of audit resources towards the completion of this task.
- 5.5 The 2018/19 exercise has concluded and the Council's outcomes were reported to Audit Committee in February 2020 (report [20/41](#)). The National Report from Audit Scotland is due to be published shortly and will be considered by the Audit Committee in due course.

Anti-Fraud and Anti-Corruption Policies

- 5.6 The Council's Counter-Fraud and Corruption Strategy, along with associated policies, have been in place since February 2015. These remain largely fit for purpose and are currently being refreshed to ensure that they take account of recently highlighted good practice.
- 5.7 The Chief Internal Auditor is the Council's nominated Money Laundering Reporting Officer. There have been no cases where money laundering was suspected during the year.

'Whistleblowing' Arrangements

- 5.8 In order to ensure that the Council meets the standards set out in its counter-fraud and corruption arrangements, some aspects of the Council's 'whistle-blowing' arrangements are managed by Internal Audit. This includes the maintenance of a dedicated e-mail address and telephone line for employees with concerns at work, which is routed to Internal Audit. The Council also supports the national charity 'Public Concern at Work' that upholds the rights of those who raise concerns about wrongdoing at their place of work and which operates a free legal advice 'hotline'.
- 5.9 Five contacts were made with Internal Audit of a 'whistleblowing' nature within the year, compared with three in 2018/19. Investigations into 4 of these have concluded, with one having been received in March 2020 requiring further work to complete. The cases investigated revealed no control implications arising, therefore detailed reports were not provided to the Audit Committee. The outcomes have fed into the updating of the Audit Universe and in the planning exercise for the 2020/21 Internal Audit Plan.
- 5.10 Whistleblowing arrangements have been in place throughout 2019/20 and are supported by a Whistle-blowing Policy, which is included within the Counter-

Fraud and Corruption Strategy. In line with the Counter-Fraud and Corruption Strategy, the Whistle-blowing arrangements are currently subject to a refresh (see 5.6 above).

Investigations

- 5.11 Internal Audit's role includes the assessment of any concerns that are raised through the above arrangements and the conduct of internal investigations where appropriate, as highlighted within 2.4 above. An allowance is made for work of this sort within the audit plan and for 2019/20 the time spent on investigations was contained within the existing resources in the Internal Audit team.
- 5.12 The year 2019/20 saw a number of investigations requiring input from Internal Audit. Investigative work undertaken within the year has resulted in agreed improvements which will enhance the Council's internal control environment. Where there is scope for improvement to the control environment identified by investigations, this is reported to the Audit Committee.

6 COMPLIANCE WITH AUDITING STANDARDS

- 6.1 The Public Sector Internal Audit Standards (PSIAS) have been adopted by Perth & Kinross Council as the relevant professional standards.
- 6.2 There is a requirement for an external review of compliance with the PSIAS to be undertaken every 5 years. This was undertaken during 2018/19 by the then Acting Chief Internal Auditor for South Ayrshire Council. This took the form of a validated self assessment, the outcome of which was reported to Audit Committee in November 2018 ([report 18/358](#) refers). This report verified that Perth & Kinross Council's Internal Audit function fully conforms with the PSIAS.
- 6.3 The Chief Internal Auditor has undertaken a self-assessment of compliance with the PSIAS for 2019/20 and has concluded that the function remains fully compliant.

Code of Ethics

- 6.4 Internal Auditors must conform to the Code of Ethics included within the Standards. This Code incorporates the principles and rules of conduct for Internal Auditors' integrity, objectivity, confidentiality and competency.

Public Sector Internal Audit Standards

- 6.5 The Standards are separated into Attributable Standards (including requirements for the establishment of the internal audit function) and performance standards (including the management and execution of internal audit activity).

Performance Measures

- 6.6 Internal Audit's prime performance measure is the completion of the approved audit plan. Performance against the approved audit plan has been highlighted in Section 2 of this report. Full completion of the Internal Audit Plan has not been possible as a result of arrangements put in place to prioritise the delivery of critical Council services during the COVID 19 pandemic.

Quality Assurance of Internal Audit

- 6.7 There is a requirement for the annual report to contain a statement on conformance with the PSIAS and the results of the quality assurance and improvement plan.
- 6.8 An External Quality Assessment of the Internal Audit function has been undertaken which verifies full compliance with the PSIAS.
- 6.9 A quality assurance system was in place in Internal Audit throughout 2018/19 which ensured the quality of Internal Audit work was of a consistent and professional standard.
- 6.10 Improvements highlighted as required by the Chief Internal Auditor as part of the Quality Assurance and Improvement Plan for 2019/20 have been addressed as follows:
- The audit manual continues to be reviewed and updated;
 - Improvements in the process for capturing requests for Internal Audit advice have been embedded.
- 6.11 Further improvements will continue into 2019/20 regarding the formalising of professional development records and a refresh of the Counter Fraud & Corruption Strategy.

7 AUDIT OPINION

- 7.1 In the Chief Internal Auditor's opinion, reasonable reliance can be placed on the Council's risk management and governance arrangements, and systems of internal control for 2019/20, subject to management implementation of the agreed actions detailed in Internal Audit reports and summarised at Section 2 above.

8. CONCLUSION AND RECOMMENDATION

- 8.1 It is recommended that the Committee notes the content of this report and specifically the Audit Opinion at Section 7.

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1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	Yes / None
Community Plan / Single Outcome Agreement	None
Corporate Plan	Yes
Resource Implications	
Financial	None
Workforce	None
Asset Management (land, property, IST)	None
Assessments	
Equality Impact Assessment	Yes
Strategic Environmental Assessment	None
Sustainability (community, economic, environmental)	None
Legal and Governance	None
Risk	Yes
Consultation	
Internal	Yes
External	None
Communication	
Communications Plan	None

1. Strategic Implications

Corporate Plan

- 1.1 The Council's Corporate Plan 2018 – 2022 lays out five outcome focussed strategic objectives which provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. They are as follows:

- (i) Giving every child the best start in life;
- (ii) Developing educated, responsible and informed citizens;
- (iii) Promoting a prosperous, inclusive and sustainable economy;
- (iv) Supporting people to lead independent, healthy and active lives; and
- (v) Creating a safe and sustainable place for future generations.

- 1.2 This report relates to all of these objectives.

2. Assessments

Equality Impact Assessment

- 2.1 Under the Equality Act 2010, the Council is required to eliminate discrimination, advance equality of opportunity, and foster good relations between equality groups. Carrying out Equality Impact Assessments for plans and policies allows the Council to demonstrate that it is meeting these duties.

- 2.2 The information contained within this report has been considered under the Corporate Equalities Impact Assessment process (EqIA) and has been assessed as **not relevant** for the purposes of EqIA.

3. Consultation

Internal

- 3.1 The Chief Executive and the Head of Legal & Governance have been consulted in the preparation of this report.

2. BACKGROUND PAPERS

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above report.

3. APPENDICES

Appendix A – The 2019/20 Internal Audit Summary