

Governance Committee

Wednesday, 24th May 2023, 2.30 pm Committee Room 1, Town Hall, Chorley and <u>Youtube</u>

Agenda

Anol	ogies
Apoi	ogies

1	Minutes of meeting Wednesday, 15 March 2023 of Governance Committee	(Pages 3 - 6)
2	Declarations of Any Interests	
	Members are reminded of their responsibility to declare any pecuniary interest in respect of matters contained in this agenda.	
	If you have a pecuniary interest you must withdraw from the meeting. Normally you should leave the room before the business starts to be discussed. You do, however, have the same right to speak as a member of the public and may remain in the room to enable you to exercise that right and then leave immediately. In either case you must not seek to improperly influence a decision on the matter.	
3	External Audit Annual Report 2021/22	
	The report of the External Auditor, Grant Thornton is to follow.	
4	External Audit Progress Report	(Pages 7 - 22)
	To receive and consider the report of the External Auditor, Grant Thornton.	
5	External Audit Plan 2022/23	
	The report of the External Auditor, Grant Thornton is to follow.	
6	Management Response to External Audit Planning Queries 2022/23	(Pages 23 - 56)
	To receive and consider the report of the Director of Finance.	
7	CIPFA Resilience Index 2021/22	(Pages 57 - 70)
	To receive and consider the report of the Director of Finance.	
8	Charities & Trust Funds Final Accounts 2022/23	(Pages 71 - 78)
	To receive and consider the report of the Director of Finance.	

9	Internal Audit Effectiveness Review	(Pages 79 - 130)
	To receive and consider the report of the Head of Audit.	,
10	Internal Audit Annual Report and Opinion 2022-23	(Pages 131 - 180)
	To receive and consider the report of the Head of Audit and Risk.	100)
11	RIPA Application Update	
	The Monitoring Officer will present a verbal report at the meeting.	
12	Governance Committee Work Programme 2023/24	(Pages 181 - 182)
	To receive and consider the work programme for the Committee in 2023/24.	102)
13	Any urgent business previously agreed with the Chair	

Chris Sinnott Chief Executive

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Minutes of	Governance Committee
Meeting date	Wednesday, 15 March 2023
Members present:	Councillor Debra Platt (Chair), Councillor Mark Clifford (Vice-Chair) and Councillors Sam Chapman, Gordon France, Margaret France, Dedrah Moss, Jean Sherwood and Neville Whitham
Officers:	Louise Mattinson (Director of Finance), Dave Whelan (Head of Legal and Procurement), Dawn Highton (Head of Audit and Risk), Jacqui Murray (Senior Auditor) and Nina Neisser (Democratic and Member Services Officer)
Apologies:	Councillor Michelle Le Marinel, Charlotte Fitch (Independent Person) and Georgia Jones (Grant Thornton)
Other Members:	Councillor Peter Ripley (Independent Person)

23.G.41 Minutes of meeting Wednesday, 18 January 2023 of Governance Committee

Resolved – That the minutes of the Governance Committee meeting held on 19 January 2023 be confirmed as a correct record for signature by the Chair.

23.G.42 Declarations of Any Interests

There were no declarations of any interests.

23.G.43 External Audit Progress Report and Sector Update

Louise Mattinson, Director of Finance presented the report on behalf of the External Auditor which provided an update on progress in delivering their responsibilities as the Council's External Auditor.

Members noted that year end was approaching on 31 March meaning that the 2022/23 Statutory Accounts would be produced shortly. Grant Thornton were currently planning the 2022/23 audit and would be presenting the detailed plan at the meeting in May. Officers had met with the External Auditors in preparation for the audit.

The Audit for 2021/22 had been completed and Grant Thornton expected to also bring the Auditors Annual Report, including the Value for Money (VfM) conclusion, to the meeting in May.

An update on the Housing Benefit Subsidy Audit was provided and Members were advised that Grant Thornton had been granted an extension by the Department for Work and Pensions. The Audit was on track to be completed by 31 March.

A National Local Government external audit procurement had been undertaken and the audits for 2023/24 - 2027/28 had been awarded and Grant Thornton would continue to be the External Auditor for Chorley Council.

The Committee noted the exploration of the reasons for the delayed publication of the audited local authority accounts in England and noted that only 12% of audited accounts for 2021/22 were published by the target date of 30 November. Members were advised that the revised deadlines for 2022/23 meant that Councils must produce their accounts by 31 May with the external audits completed by 30 September. A consultation had taken place on these dates, which are considered unachievable, and officers were awaiting a response.

Resolved – That the update be noted.

23.G.44 Internal Audit Plan April 2023 - September 2023

Dawn Highton, Head of Audit and Risk presented her report which set out the programme of work to be undertaken by the Internal Audit Service.

Members noted the Internal Audit Plan which contained the programme of reviews for the six-month period from April 23 to September 23 and was shown at Appendix A. This highlighted the link between the work of Internal Audit, strategic and operational risks and corporate objectives. The plan also detailed involvement with the key project teams assisting with advice and guidance on risk management, internal control and governance.

The Committee were advised that it had again been agreed that the Internal Audit Service would provide 105 audit days to Chorley Leisure Limited (CLL). Whilst the outcome of each audit review would be reported to the Board of the Directors, the Governance Committee would receive an annual opinion on the adequacy and effectiveness of the internal control, risk management and governance arrangements for CLL.

The plans for both the Council and CLL would be completed solely by the in-house team with external support procured for the specialist ICT reviews. Over the past 12 months, the Service had increased its capacity with the introduction of a Trainee Auditor post. There was no change to the performance indicators or targets for the forthcoming period of April 2023 to March 2024.

Resolved – That the Committee approve the Internal Audit Plan and associated indicators.

Local Code of Corporate Governance 23.G.45

Dave Whelan, Head of Legal and Procurement presented the report of the Director of Governance which updated the Governance Committee on the outcome of a review of the Local Code of Corporate Governance.

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The Committee recognised that the Council had an adopted Local Code of Corporate Governance, and although not a requirement, this was compliant with CIPFA Guidance and followed best practice. The Local Code, which was periodically reviewed, set out how the Council delivers its Corporate Governance Framework and explains how it operates.

Members noted that overall, the Code was considered a fundamentally sound document, with no substantial changes. In recent years, the format and presentation of the Code had been improved and the newly adopted policies and processes were referenced. The changes this year related to the update of the equalities policy to reflect the adoption of the newly approved Equality Framework.

Resolved – To approve the Local Code of Corporate Governance at Appendix A.

RIPA Application Update 23.G.46

Dave Whelan, Deputy Monitoring Officer reported that no RIPA applications had been made.

23.G.47 Governance Committee Work Programme 2023/24

The Committee considered the work programme for 2023/24 which set out the reports to be considered at each Governance Committee meeting throughout the Council year.

Chair

Date

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Chorley Borough Council Audit Progress Report and Sector Update

Year ending 31 March 2023

May 2023



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purpose.	ma as nc re ch re be be in dc oc re co pr	e contents of this report relate only to the atters which have come to our attention, nich we believe need to be reported to you part of our audit planning process. It is t a comprehensive record of all the evant matters, which may be subject to ange, and in particular we cannot be held sponsible to you for reporting all of the ks which may affect the Authority or all eaknesses in your internal controls. This poort has been prepared solely for your nefit and should not be quoted in whole or part without our prior written consent. We not accept any responsibility for any loss casioned to any third party acting, or fraining from acting on the basis of the ntent of this report, as this report was not epared for, nor intended for, any other irpose.
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Introduction

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Senior In Charge Auditor T 0161 214 6386 E mehboob.o.koorowlay@uk.gt.com This paper provides the Governance Committee with a report on progress in delivering our responsibilities as your external auditors.

The paper also includes:

- a summary of emerging national issues and developments that may be relevant to you as a local authority; and
- includes a number of challenge questions in respect of these emerging issues which the Committee may wish to consider (these are a tool to use, if helpful, rather than formal questions requiring responses for audit purposes)

Members of the Governance Committee can find further useful material on our website, where we have a section dedicated to our work in the public sector. Here you can download copies of our publications <u>https://www.grantthornton.co.uk/en/services/public-sector-services/</u>

If you would like further information on any items in this briefing, or would like to register with Grant Thornton to receive regular email updates on issues that are of interest to you, please contact either your Engagement Lead or Engagement Manager.

Progress at May 2023

Financial Statements Audit

We completed our initial planning for the 2022/23 audit in March and April 2023. We expect to receive your draft financial statements in August 2023.

In May, we have issued our detailed audit plan, setting out our proposed approach to the audit of the Authority's 2022/23 financial statements.

We will report our work in the Audit Findings Report and aim to give our opinion on the Statement of Accounts by 30 November 2023.

The Accounts and Audit Regulations 2015 were amended by SI 2021 No. 263. The Department for Levelling Up, Housing and Communities (DLUHC) previously introduced secondary legislation to extend the deadline for publishing audited local authority accounts to 30 November 2022 for the 2021/22 accounts.

This was enacted by The Accounts and Audit (Amendment) Regulations 2022 (SI 2022 No. 708) that came into force on 22 July 2022. The deadline for publishing audited local authority accounts for 2021/22 was extended to 30 November 2022 and thereafter changed to 30 September for years up to 2027/28.

Officers have advised us that the draft financial statements are likely to be available for audit in August. The deadline for the preparation of draft accounts for 22/23 is the end of May 2023 however the ongoing impact of the pandemic, the complexity of accounting requirements and capacity in the finance team mean that we have agreed with officers to commence the audit on a later timescale. This means we will not complete the audit by the target date of the end of September but will work with officers to complete the audit towards the end of November if possible.

Value for Money

The new Code of Audit Practice (the "Code") came into force on 1 April 2020 for audit years 2020/21 and onwards. The most significant change under the new Code was the introduction of an Auditor's Annual Report, containing a commentary on arrangements to secure value for money and any associated recommendations, if required.

The new approach is more complex, more involved and is planned to make more impact.

Under the 2020 Code of Audit Practice, for relevant authorities other than local NHS bodies auditors are required to issue our Auditor's Annual Report no later than 30 September or, where this is not possible, issue an audit letter setting out the reasons for delay.

As a result of the ongoing pandemic, and the impact it has had on both preparers and auditors of accounts to complete their work as quickly as would normally be expected, the National Audit Office has updated its guidance to auditors to allow us to postpone completion of our work on arrangements to secure value for money and focus our resources firstly on the delivery of our opinions on the financial statements. This is intended to help ensure as many as possible could be issued in line with national timetables and legislation. The extended deadline for the issue of the Auditor's Annual Report is now no more than three months after the date of the opinion on the financial statements. We have issued our Auditor's Annual Report 2021/22 in May 2023.

Progress at May 2023 (cont.)

Other areas

Certification of claims and returns

We certify the Authority's annual Housing Benefit Subsidy claim in accordance with procedures agreed with the Department for Work and Pensions (DwP). The certification work for the 2021/22 claim began in January. DwP extended the deadline for reporting the findings of this work to 31 January 2023. We have liaised with DWP and we expect to complete our work and report to DwP by 31 May 2023.

Meetings

We met with Finance Officers as part of our quarterly liaison meetings and continue to be in discussions with finance staff regarding emerging developments and to ensure the audit process is smooth and effective. We have also met with your Chief Executive to obtain and update on emerging issues and challenges for the Council.

We have also provided training to your finance team with a view to helping the audit progress smoothly this year. This included detail around the standard of audit evidence required. We continue to liaise with finance officers to try to ensure an efficient audit for 2022/23.

Events

We provide a range of workshops, along with network events for members and publications to support the Authority. Your officers were invited to our Accounts Workshop in January and February 2023, where we highlighted financial reporting requirements for local authority accounts and gave insight into elements of the audit approach.

Further details of the publications that may be of interest to the Authority are set out in our Sector Update section of this report.

Audit Fees

Audit Fees

During 2017, PSAA awarded contracts for audit for a five year period beginning on 1 April 2018. 2022/23 is the fifth year of that contract. Since that time, there have been a number of developments within the accounting and audit profession. Across all sectors and firms, the Financial Reporting Council (FRC) has set out its expectation of improved financial reporting from organisations and the need for auditors to demonstrate increased scepticism and challenge and to undertake additional and more robust testing.

Our work in the Local Government sector in the period 2018/19 to 2021/22 has highlighted areas where financial reporting, in particular, property, plant and equipment and pensions, needs to improve. There is also an increase in the complexity of Local Government financial transactions and financial reporting. This combined with the FRC requirement that all Local Government audits are at or above the "few improvements needed" (2A) rating means that additional audit work is required.

We have reviewed the impact of these changes on both the cost and timing of audits. We have discussed this with your s151 Officer including any proposed variations to the Scale Fee set by PSAA Limited, and have communicated fully with the Audit Committee.

As a firm, we are absolutely committed to meeting the expectations of the FRC with regard to audit quality and local government financial reporting.

Additional fees for 2021-22

Our audit of the financial statements took longer than anticipated or planned for. This is primarily due to additional audit work which was undertaken in response to new issues identified during the audit as reported in the Audit Findings Report 2021/22. We are therefore proposing an additional fee of £15,450 in relation to the 2021/22 audit.

The reasons for the additional fee are:

- Group accounts there are transactions and balances reported in the accounts for Chorley Leisure Limited which, when consolidated, have a
 material impact to Council's Statement of Accounts. Therefore, management prepared a revised draft Statement of Accounts including group
 financial statements which required additional audit procedures to assure specific items in the subsidiary accounts and the consolidation process
- Technical consultation there were misstatements identified in the accounting for Minimum Revenue Provision and Capital Financing which required consultation with our financial reporting technical team and resulted in material adjustments to the draft Statement of Accounts
- Valuation expert due to the complexity and estimation uncertainty in relation to valuations of land and buildings and investment property, we consulted with our internal property valuations expert to verify the appropriateness of significant assumptions and key inputs to the valuations
- VFM work when we issued our Audit Plan for 2021/22 in June 2022, our initial risk assessment did not consider the findings of Internal Audit's review
 of Commercial Service Directorate Procurement (issued January 2023). We considered this as a risk of significant weaknesses in the Council's
 arrangements; subsequently, we have performed additional work, with assistance from our specialist Public Sector Advisory team, focusing on the
 issues identified and the findings are reported in the Auditor's Annual Report 2021-22.

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Audit Deliverables

2022/23 Deliverables	Planned Date	Status
Audit Plan	May 2023	Completed
We are required to issue a detailed audit plan to the Governance Committee setting out our proposed approach in order to give an opinion on the Authority's 2022/23 financial statements and to report on the Authority's value for money arrangements in the Auditor's Annual Report		
Audit Findings Report	November 2023	Not yet due
The Audit Findings Report will be reported to the November Audit Committee.		
Auditors Report	November 2023	Not yet due
This includes the opinion on your financial statements.		
Auditor's Annual Report	November 2023	Not yet due
This report communicates the key outputs of the audit, including our commentary on the Authority's value for money arrangements.		

Sector Update

Authorities continue to try to achieve greater efficiency in the delivery of public services, whilst facing the challenges to address rising demand, ongoing budget pressures and social inequality.

Our sector update provides you with an up to date summary of emerging national issues and developments to support you. We cover areas which may have an impact on your organisation, the wider local government sector and the public sector as a whole. Links are provided to the detailed report/briefing to allow you to delve further and find out more.

Our public sector team at Grant Thornton also undertake research on service and technical issues. We will bring you the latest research publications in this update. We also include areas of potential interest to start conversations within the organisation and with audit committee members, as well as any accounting and regulatory updates.

- Grant Thornton Publications
- Insights from local government sector specialists
- Reports of interest
- Accounting and regulatory updates

More information can be found on our dedicated public sector and local government sections on the Grant Thornton website by clicking on the logos below:



Delayed publication of audited local authority accounts

In December 2022 there were over 600 local audit opinions outstanding. This means that many stakeholders can't rely on audited accounts to inform decision making - a significant risk for aovernance and control.

Local authority accounts are becoming increasingly complex as accounting standards evolve and local authorities enter more and more innovative financing arrangements and income generation projects. A significant challenge in managing local audits is the differing needs of various stakeholders. The local government sector, central government and regulators need to agree on the purpose of local audit and find a consensus on improving efficiency in publishing accounts. Grant Thornton has produced a report that explore the reasons for delayed publication of audited local authority accounts.

Table 1 below illustrates the declining performance against the target date for publication of audited accounts in recent years.

Table 1 Audited accounts published by target date over the last six years

Financial year	Deadline for publication of unaudited accounts	Target date for publication of audited accounts	% audited accounts published by target date (all firms average)	% audited accounts published by target date (Grant Thornton audits)
2016/17	30 June 2017	30 September 2017	95	97
2017/18	31 May 2018	31 July 2018	87	91
2018/19	31 May 2019	31 July 2019	58	65
2019/20	1 September 2020	30 November 2020	45	54
2020/21	1 August 2021	30 September 2021	9	12
2021/22	1 August 2022	30 November 2022	12	20

About time?

Exploring the reasons for delayed publication of audited local authority accounts

March 2023



Delayed publication of audited local authority accounts

What more can be done?

All key stakeholders in the local audit system will need to continue their efforts to secure improvement and a return to high levels of compliance with timely publication of audited accounts. The report explores several of the causes of delay and steps which might be taken to reduce the incidence of delays.

These steps relate to systems leadership, holding both authorities and auditors to account for their performance, a continued focus on the quality of accounts preparation and audit, and the effective engagement between auditors and audited bodies.

The report makes 20 recommendations for improving timeliness in publishing audited accounts.

The report also sets out a checklist which management and the audit committee should consider. The report recommends DLUHC, CIPFA or the FRC set out expectations for the system as a whole.

Click here for full report

About time?

Exploring the reasons for delayed publication of audited local authority accounts

March 2023



Agenda Item

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Local government procurement and contract management

Background

Local authorities in England spend around £82.4 billion a year on goods and services. More than a third of all UK government spending on goods and services is spent in the local government sector1. Allowing for capital spending as well, the UK public sector procures around £300 billion a year overall.

We reviewed a large number of reports, inspections and interventions issued by a number of firms, including 53 Annual Auditor Reports issued by Grant Thornton UK LLP. To help build on existing good practice, in this report we highlight some common themes for members and officers to consider:

This report considers a selection of issues we identified under each theme and makes recommendations both to local authorities and, in one case, to central government. The report presents a good practice checklist for local authority members and officers to reflect on.

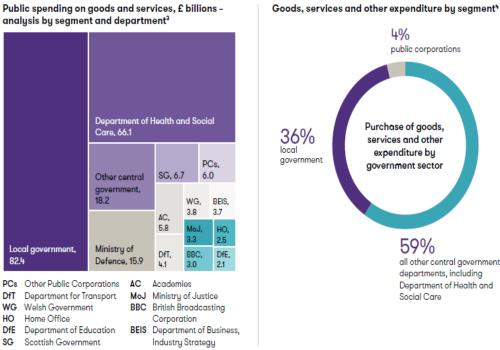
The analysis sets out five key themes for ensuring good practice:

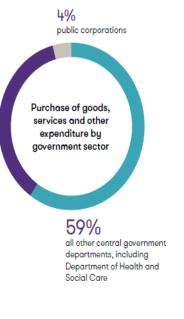
- Strategic planning
- Internal control
- •Time, technical expertise, and people
- •Commercial awareness
- •Contract management

full report here

More than a third of all UK government spending on goods and services is spent by local government, so it's important councils have effective arrangements for procurement and contract management

UK public spending





1 HM Treasury, Whole of Government Accounts: year ended 31 March 2020, June 2022

- 2 Cabinet Office, Transforming Public Procurement: Government response to consultation, December 2021
- 3 HM Treasury, Whole of Government Accounts: year ended 31 March 2020, June 2022

4 HM Treasuru, Whole of Government Accounts: uear ended 31 March 2020, June 2022

SEND deficits kept off budgets for another three years

The government has allowed councils to keep deficits on spending for children with special educational needs and disabilities off their balance sheets for a further three years.

The government's local government finance policy statement published on 12th December 2022 says that the statutory override for the Dedicated Schools Grant (DSG) will be extended for the next three years, from 2023-24 to 2025-26.

Councils use the high needs funding block of the DSG to fund Send provision. But for many authorities, the cost of this has been outstripping the amounts provided by tens of millions of pounds, leading to <u>a total deficit estimated at more than £2bn</u>.

The statutory override means that any DSG deficits are not included in council's main revenue budgets. Before today's announcement, it had been due to expire in 2023. Last year, Matt Dunkley, chair of the Association of Directors of Children's Services' resources and sustainability policy committee, said: "We think the cumulative high needs block deficits of local authorities are approximately £2.3bn."

In June, the government <u>launched the £85m Delivering Better Value in Send programme</u>, that involves specialist advisors probing 55 councils' financial data to try and cut their DSG deficits. The Chartered Institute of Public Finance and Accountancy, a partner in the programme, said the scheme would provide "project management, change management and financial modelling capacity".

The programme is running alongside the Department for Education's 'safety valve' support scheme that offers bailouts for the councils with the largest Send spending deficits, in return for them implementing stringent reforms.

<u>About 40 councils are expected to receive safety valve funding</u>, meaning that the two programmes together will include about two thirds of councils with responsibility for Send. Also in June, the then children's minister Will Quince wrote a letter to council chief executives warning that a "significant number of councils are "running services that are not sustainable, and instead jeopardise the longevity of that crucial support".





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Stonewall Gold Employer: GT's LGBTQIA+ inclusion journey

Background

15 Feb 2023, Stonewall, Europe's largest charity for Lesbian, Gay, Bi, Trans, and Queer (LGBTQIA+) rights, launched its widely anticipated Top 100 Employers List – recognising us for our work in supporting LGBTQIA+ colleagues to be the best versions of themselves at work and awarding us Gold Employer, the highest award.

We're proud to announce that we've ranked among the UK's leading employers from the public, private, and third sectors in the <u>Stonewall</u> Workplace Equality Index (WEI). We've also been recognised as a Gold Employer. Overall, we've ranked 38th in the latest WEI results, and 26th in the private sector, and 9th in the financial services sector.

Sustainability: Finance at the heart of decision making

In November 2022 CIPFA published an article on public sector specific response to climate change. Below is an extract from CIPFA's website:

"Role of the finance profession

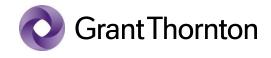
Finance and accounting professionals need to move beyond simply measuring and reporting the impact of climate change, environmental regulation, supply chain pressure and rising energy costs. They must focus on understanding those implications and integrating them into financial management and business planning. The ability to integrate climate risks into overall operational risks is a major challenge. The finance profession will need to be able to collect data from different professions (scientists, valuation experts, biologists, meteorologists etc) and be able to understand but also challenge assumptions and projections. The importance of effective communication to both internal and external stakeholders must not be underestimated. Climate reporting should result in decision makers having all the information necessary to be effective, to measure progress and to hold those responsible to account.

Opportunities and risks must be identified and stress tested using various scenarios, including temperature rises of 2C and more. The impact of collapsed ecosystems must not be ignored – from rising sea levels to food scarcity and the mass migration of people whose land is no longer inhabitable. We need honesty, transparency and above all leadership to tackle the climate issues that exist and lie ahead.

Conclusion

The current focus on net zero emissions by 2050 misses the point that climate change is already happening. There is an urgent need for adaptation measures to be introduced that allow the UK to live with higher temperatures, wetter winters and warmer, drier summers. At the moment we are severely under prepared. This is a call for urgent action from government, both at central and local level. The IPCC recommended threshold of limiting temperature rises to 1.5C is <u>set to</u> <u>be broken</u>. Temperature rises above 2.5C will mean ecosystems will collapse which will have severe repercussions on our society as a whole. CIPFA and ICAEW share the view that the finance function has an important role to play in combating climate change. We would like to see the finance profession taking the lead for the public sector in its efforts to tackle climate change".

Click here for link to the article





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Report of	Meeting	Date
Director (Finance)	Governance Committee	Wednesday, 24 May 2023

Management Response to External Audit Planning Enquiries

Is this report confidential?	No
Is this decision key?	No
Savings or expenditure amounting to greater than £100,000	No

Purpose of the Report

1. To present to the Governance Committee, as those charged with governance of the Council, the management responses provided to the planning enquiries made by the External Auditors, Grant Thornton, as part of the 2022/23 statutory accounts.

Recommendations

2. The Governance Committee, is asked to review and approve the management responses to the auditors enquires, as attached.

Reasons for recommendations

- 3. In line with Auditing Standards, and to support the Audit Planning process, the External Auditors need to establish the risk of fraud or error.
- The Auditors' questions, answers provided by Management, and details of estimates / 4. methodology used are outlined at Appendix A.
- 5. Once again, this report is being brought to Governance Committee early this year to ensure a prompt start, and timely conclusion to the Audit.

Other options considered and rejected

6. Not applicable.

Corporate priorities

7. The report relates to the following corporate priorities:

Involving residents in improving their	A strong local economy
local area and equality of access for all	
Clean, safe and healthy communities	An ambitious council that does more to

meet the needs of residents and the
local area

Background to the report

8. In line with Auditing Standards, and to support the Audit planning process, the External Auditors need to establish the risk of fraud or error.

Climate change and air quality

9. The work noted in this report does not impact the climate change and sustainability targets of the Council's Green Agenda.

Equality and diversity

10. Not applicable.

Risk

11. The risks identified to the External Auditors, in response to the planning enquiries are detailed in the Appendices to the report.

Comments of the Statutory Finance Officer

As part of their responsibilities in conducting the audit of the statutory accounts, the 12. External Auditors are required to seek responses, and request information, on all aspects of the Council's activities as they feel are necessary. The information requested as part of their planning enquiries, is in line with this.

Comments of the Monitoring Officer

No further comments in addition to above. 13.

Background documents

There are no background papers to this report.

Appendices

Appendix A – External Auditor Planning Enquiries & Management Response & Estimates used in the production of the 2022/23 Accounts.

Report Author:	Email:	Telephone:	Date:
Steve Kenyon (Interim Deputy Director of Finance)	steve.kenyon@chorley.gov.uk	01257 515151	19 th April
Jeanie Waddington (Principal Financial Accountant)	jean.waddington@chorley.gov.uk	01257 515151	2023

Chorley Borough Council – 2022/23 Audit

Informing the Audit Risk Assessment

GENERAL ENQUIRIES OF MANAGEMENT

Question	Management response
	The Council received funding of £1,584,588 in 2021/22 under the Coronavirus Additional Relief Fund (CARF). All reliefs relating to this scheme were applied in 2022/23 and totalled £1,495,924. The Council received grants of £408,000 and £53,600 in 2022/23 as interim payments (80%) in respect of Energy Bills Support Scheme and Alternative Fuel Payment Scheme. No payments were made under these schemes in 2022/23, and payments will be made in 2023/24. The Council received £6,389,100 in 2021/22 to issue a non- repayable rebate of £150 to households in Council tax Bands A to D. Payments were issued in 2022/23 and amounted to £6,329,400. In addition, the Council received funding of £181,200 in 2022/23 to devise a discretionary element to supplement the above scheme; payments totalling £176,337 were issued during 2022/23. The Council has received an allocation of £4.2m under the UK Shared Prosperity Fund (UKSPF); this is revenue and capital funding to support Town Centre and infrastructure improvements, regeneration and skills over the period 2022/23 to 2024/25. The allocations for 2022/23 are £109k (Capital) and £402k (Revenue)

2. Have you considered the appropriateness of the accounting policies adopted by the Council? Have there been any events or transactions that may cause you to change or adopt new accounting policies? If so, what are they?	We have considered the accounting policies. There have not been any events or transactions that have caused us to change or adapt our accounting policies.
3. Is there any use of financial instruments, including derivatives? If so, please explain	No
4. Are you aware of any significant transaction outside the normal course of business? If so, what are they?	Nothing in addition to those mentioned at Question 1.
5. Are you aware of any changes in circumstances that would lead to impairment of non-current assets? If so, what are they?	Prevailing economic conditions may see temporary reductions in valuations of some assets.
 Are you aware of any guarantee contracts? If so, please provide further details 	None
7. Are you aware of the existence of loss contingencies and/or un-asserted claims that may affect the financial statements? If so, please provide further details	Νο

8. Other than in house solicitors, can you provide details of those solicitors utilised by the Council during the year. Please indicate where they are working on open litigation or contingencies from prior years?	 Forbes Solicitors – appointed to advise in respect of some Chorley owned companies including Chorley Property Limited Forbes Solicitors – miscellaneous employment advice Kings Chambers – barristers – instructed on some Planning Inquiries
9. Have any of the Council's service providers reported any items of fraud, non-compliance with laws and regulations or uncorrected misstatements which would affect the financial statements? If so, please provide further details	No
10. Can you provide details of other advisors consulted during the year and the issue on which they were consulted?	See attached; GT Summary - Chorley External Cor
11. Have you considered and identified assets for which expected credit loss provisions may be required under IFRS 9, such as debtors (including loans) and investments? If so, please provide further details	None identified, however we await information from asset valuers before finalizing our position on this.

FRAUD RISK ASSESSMENT

1. Has Council assessed the risk of material misstatement in the financial statements due to fraud?

How has the process of identifying and responding to the risk of fraud been undertaken and what are the results of this process?

How do the Council's risk management processes link to financial reporting?

Yes, and there is no indication that the financial statements have been materially misstated due to fraud

Internal Audit undertake their own proactive fraud detection work and participate fully in the National Fraud Initiative.

Based on its activity, Internal Audit is responsible for reporting significant risk exposures and control issues identified to the Governance Committee and to Senior Management Team, including fraud risks and governance issues.

Internal Audit Section will undertake special investigations in cases of suspected fraud or irregularity. Financial Procedure Rules and the Council's Anti-Fraud and Corruption Policy require the Head of Audit to be notified immediately of all discovered or suspected cases of fraud, corruption or other financial irregularity.

Fraud in relation to revenues and benefits is dealt with separately by specific investigation officers.

The s151 Officer has the overall responsibility for assessing the risk of material misstatement in the financial statements and is supported by services who provide the appropriate evidence for this assessment.

A review of all corporate risks forms part of the quarterly report to the Leadership Team, of which the CFO is a member, identifying risk levels, risk owners and mitigating actions. This is reported to Shared Senior Management Team of which the CFO is a member.

All reports submitted to committees require financial comments from the CFO or qualified representative. In addition, a risk section has been added to reports so that authors outline the major risks associated with decisions.

Financial implications of future risks are discussed amongst officers at Senior Management Team as well interaction with members at leader's brief and committee meetings

2. What have you determined to be the classes of accounts, transactions and disclosures most at risk to fraud?	There is always a risk of error and fraud in relation to Benefits and supplier payments however we are confident this is mitigated through quality assurance processes, segregation of duties and internal checks within the systems / teams involved. An additional level of assurance is provided through the work of Internal Audit.
3. Are you aware of any instances of actual, suspected or alleged fraud, errors or other irregularities either within the Council as a whole, or within specific departments since 1 April 2022? If so, please provide details	
4. As a management team, how do you communicate risk issues (including fraud) to those charged with governance?	Through the work carried out by internal audit Reporting of Corporate Risks to Governance Committee Specific fraud would be communicated to the Governance Committee when deemed material
 5. Have you identified any specific fraud risks? If so, please provide details Do you have any concerns there are areas that are at risk of fraud? Are there particular locations within the Council where fraud is more likely to occur? 	Fraud risk associated with Covid Business Grants was no longer an issue in 2022/23 as reliefs (e.g. CARF) were applied directly to Business Rates accounts (as opposed to payments being made). No

6. What processes do the Council have in place to identify and respond to risks of fraud?	Internal Audit, in accordance with the Public Sector Internal Audit Standards considers the risk of fraud in every review.Fraud risks are included on the Council's dedicated risk management system GRACE and categorised as a fraud risk to allow for specific fraud risk monitoring.
 7. How do you assess the overall control environment for the Council, including: the existence of internal controls, including segregation of duties; and the process for reviewing the effectiveness the system of internal control? If internal controls are not in place or not effective where are the risk areas and what mitigating actions have been taken? 	 During 22/23, a comprehensive internal audit plan has been delivered for the Council focusing on the overall control environment to consider if it is effective. Where controls are deemed to be ineffective or need strengthening, a robust action plan is developed with the risk owner with agreed timescales for implementation of mitigating actions. Counter Fraud policies are in place and available on both the intranet and the website. These include: Anti Fraud, Bribery and Corruption Strategy Whistleblowing policy Anti money laundering policy. The Fraud Response plan
What other controls are in place to help prevent, deter or detect fraud? Are there any areas where there is a potential for override of controls or inappropriate influence over the financial reporting process (for example because of undue pressure to achieve financial targets)? If so, please provide details	No specific areas for the over ride of controls have been identified during 22/23.

8. Are there any areas where there is potential for misreporting? If so, please provide details	There is adequate separation of duties in place to prevent the potential for misreporting
 9. How does the Council communicate and encourage ethical behaviours and business processes of it's staff and contractors? How do you encourage staff to report their concerns about fraud? What concerns are staff expected to report about fraud? Have any significant issues been reported? If so, please provide details 	The Code of Conduct including ethical standards and behaviours which officers are required to comply with. The code is referenced in employee appointment letters and a link is provided in the letter to a number of relevant documents including the Code of Conduct, adherence to which is a condition of their employment The Information Security Policy is also there which states what is acceptable and unacceptable in terms of information and using the Council's IT systems. Council values that provide an ethical framework are used at recruitment and during staff reviews. Awareness is raised of probity policies via Core Brief and items on the Intranet. Mandatory fraud awareness training has been rolled out to all officers. No significant issues have been reported
10. From a fraud and corruption perspective, what are considered to be high-risk posts?How are the risks relating to these posts identified, assessed and managed?	The recruitment process includes robust measures to ensure all relevant documents are obtained and reviewed prior to an offer of employment being made.
11. Are you aware of any related party relationships or transactions that could give rise to instances of fraud? If so, please provide detailsHow do you mitigate the risks associated with fraud related to related party relationships and transactions?	No Major related party's risks are monitored and reported separately

12. What arrangements are in place to report fraud issues and risks to the Governance Committee?	Governance Committee approve the Internal Audit Plan and receive interim reports throughout the year.
How does the Governance Committee exercise oversight over management's processes for identifying and responding to risks of fraud and breaches of internal control?	Reports contain a summary of work undertaken and would include fraud risk and issues and breaches of internal control if identified.
What has been the outcome of these arrangements so far this year?	The Internal Audit reviews completed during 22-23 have not identified any fraud issues.
13. Are you aware of any whistle blowing potential or complaints by potential whistle blowers? If so, what has been your response?	No
14. Have any reports been made under the Bribery Act? If so, please provide details	No

IMPACT OF LAW & REGULATIONS

1. How does management gain assurance that all relevant laws and regulations have been complied with?	It is a requirement for the Monitoring Officer to receive and comment on all council and executive decisions.
What arrangements does the Council have in place to prevent and detect non-compliance with laws and regulations? Are you aware of any changes to the Council 's regulatory environment that may have a significant impact on the Counci's financial statements?	Internal controls, segregation of duties, and the work of Internal Audit / risk management processes outlined previously
2. How is the Governance Committee provided with assurance that all relevant laws and regulations have been complied with?	Monitoring Officer (or deputy) attends all Governance Committee meetings
3. Have there been any instances of non- compliance or suspected non-compliance with laws and regulation since 1 April 2022 with an on-going impact on the 2022/23 financial statements? If so, please provide details	None
4. Are there any actual or potential litigation or claims that would affect the financial statements? If so, please provide details	None
5. What arrangements does the Council have in place to identify, evaluate and account for litigation or claims?	Litigation or claims may be picked up by legal services or services. Where necessary these will be reported to the Leader of the Council through the monitoring officer. Any budget implications of such litigations will be reported to Executive Cabinet, either through a separate

	report or through the quarterly budget monitoring report. The Council has set aside reserves to fund possible future costs of planning appeals.
6. Have there been any reports from other regulatory bodies, such as HM Revenues and Customs, which indicate non-compliance? If so, please provide details	None

RELATED PARTIES

 Have there been any changes in the related parties including those disclosed in the Council's 2021/22 financial statements? 	The Shared Service operating model with South Ribble Borough Council continued to be rolled out through 2022/23, overseen by a joint Committee with representation from both Councils.
If so please summarise:	
 the nature of the relationship between these related parties and the Council 	
 whether the Council has entered into or plans to enter into any transactions with these related parties 	
 the type and purpose of these transactions 	

2. What controls does the Council have in place to identify, account for and disclose related party transactions and relationships?	 Finance obtain lists of all related parties / declarations of interest from; Directors Staff Elected Members
3. What controls are in place to authorise and approve significant transactions and arrangements with related parties?	The Council has sufficient separation of duties and appropriate authorisation limits to ensure purchase orders and invoices are paid as required. Monthly budget monitoring ensures that the Council will identify any variances to agreed payments with related parties.
4. What controls are in place to authorise and approve significant transactions outside of the normal course of business?	Payments cannot be paid outside normal procedure rules including separation of duties regarding payments being raised and invoices paid. There is no out of hours service.

GOING CONCERN

1. What processes and controls does management have in place to identify events and / or conditions which may indicate that the statutory services being provided by the Council will no longer continue?

- Development & continuing refresh of Corporate Strategy
- Individual service and employee plans linked to Corporate Strategy
- Regular reviews of service and corporate level risk registers
- In year budget monitoring
- Medium Term financial planning (Revenue)

Capital Strategy
No – not aware of any factors
Yes – direct provision for the foreseeable future
Yes – satisfied
Yes - satisfied

ACCOUNTING ESTIMATES

1. What are the classes of transactions, events and conditions, that are significant to the financial statements that give rise to the need for, or changes in, accounting estimate and related disclosures?	Pension Valuations PPE Valuations Minimum Revenue Provision Material Creditor and Debtor transactions including shared services charges between Councils Provision for Business Rates appeals. Preparation of Group Accounts
2. How does the Council's risk management process identify and address risks relating to accounting estimates?	This is dealt with within the finance section Senior Finance staff keep up-to-date with changes in accounting practises including purchasing the Code of Practice, attending relevant CIPFA training sessions and reviewing previous accounts to prepare for any changes.
3. How does management identify the methods, assumptions or source data, and the need for changes in them, in relation to key accounting estimates?	Use of the CIPFA code of practice for local govt accounts. Review of source data provided to external experts (PP&E, pensions) and comparison of assumptions and results between financial years.
4. How do management review the outcomes of previous accounting estimates?	Comparison of estimates to eventual actual transactions, use this to form future judgements. Use these to review and challenge current outcomes of estimates.
5. Were any changes made to the estimation processes in 2022/23 and, if so, what was the reason for these?	No changes made to the processes, however underlying assumptions are continually reviewed and changed as necessary.

6. How does management identify the need for and apply specialised skills or knowledge related to accounting estimates?	Review of skills held internally, and outsource identified gaps, using knowledge of reputable and appropriate experts.
7. How does the Council determine what control activities are needed for significant accounting estimates, including the controls at any service providers or management experts?	Review the underlying assumptions, and where there is material change, analyse to understand it and/or challenge the results.
8. How does management monitor the operation of control activities related to accounting estimates, including the key controls at any service providers or management experts?	Answered above
 9. What is the nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates, including: Management's process for making significant accounting estimates The methods and models used The resultant accounting estimates included in the financial statements. 	Any substantial changes to the statement of accounts that result from changes in accounting estimates will be reported to Governance Committee alongside the draft statement. If any changes to accounting policy / estimation methods gave rise to a significant movement from previous years, then we would reference this in the covering report / when presenting the draft accounts

10. Are management aware of any transactions, events, conditions (or changes in these) that may give rise to recognition or disclosure of significant accounting estimates that require significant judgement (other than those in Appendix A)? If so, what are they?	No
11. Why are management satisfied that their arrangements for the accounting estimates, as detailed in Appendix A, are reasonable?	Yes
12. How is the Governance Committee provided with assurance that the arrangements for accounting estimates are adequate ?	Any substantial changes to the statement of accounts that result from changes in accounting estimates will be reported to Governance Committee alongside the draft statement. If any changes to accounting policy / estimation methods gave rise to a significant movement from previous years, then we would reference this in the covering report / when presenting the draft accounts

APPENDIX A - ACCOUNTING ESTIMATES

Land and buildings Valuations

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No.

2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	Valuations done by RICS surveyors. No.
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	n/a
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	As per agreed valuations schedule. No.
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	RICS surveyors – work goes out to tender every 3 years. Due for tender exercise next year.
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Review of valuations done by surveyors – challenged as necessary.
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes.

8. Were any changes made to the key control activities this year? If so please provide details.	No.
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	n/a
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Range of outcomes is limited given the area of estimation.

Depreciation

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No.
 2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change? 	As per financial policy/accounting convention. No.
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	From valuers, or consistent schedule. No.

Commercial in confidence

4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	Asset Register. No.
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	No.
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	n/a
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes.
8. Were any changes made to the key control activities this year? If so please provide details.	No.
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Refer to valuations/info returned by the surveyors.
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Review by finance team along with consideration of info from valuers.

Deferred Income

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	Bulk of these costs are lease arrangements so accounting requirements are prescribed. No changes
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	N/a n/a
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	Data is direct from ledger and lease info no
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	In house accounting team knowledge
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Leases all flow through finance – other transactions would be monitored on the ledger

7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes
8. Were any changes made to the key control activities this year? If so please provide details.	None
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Limited estimation so uncertainty not great.
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Scale is not such that changes can have a material impact.

Bad-debt provision

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used?Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	Method agreed as part of accounting policy and process

3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	Based upon prior experience and accountancy standards. No
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	Data is from ledger / debtors system No
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	No
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Aged debt monitored and reported quarterly
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes – debtors regularly monitored
8. Were any changes made to the key control activities this year? If so please provide details.	No
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Specific areas are examined by individual finance officer where there is greater risk e.g. rental income

10. How do management consider the
sensitivity of the estimate to the methods and
assumptions used and identify the range of
reasonably possible outcomes for disclosure in
the financial statements?Provision required is considered each year based upon past evidence and economic conditions
as well as specific service knowledge.

Provision (NNDR)

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	For pre-2017 List appeals, a calculation is carried out based on levels of outstanding appeals, the grounds of the appeals and past experience of success rates and levels of reductions in RV. For the 2017 List, provision is based on an estimated percentage, derived with reference to comparator councils, adjusted for changes made at the 'Check' and 'Challenge' stages. No change.
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	Estimates are derived by reference to the available relevant data, comparators, etc and in accordance with professional standards and guidance.
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	From reports produced by the Revenues & Benefits Department. No.

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in respect of this accounting estimates, and if so	
how were these specialist skills procured?	
 6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts? 	In house procedures/controls.
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Estimate has been produced in-house. LG Futures have been retained to review and advise on its appropriateness.
8. Were any changes made to the key control activities this year? If so please provide details.	No.
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	A degree of estimation uncertainty is inherent even with the pre-2017 List, because although it is based on objective data and an established methodology, there is always the possibility of variation from previous percentage success rates and RV reduction. The uncertainty is higher in respect of the 2017 List, where there is very little objective evidence on which to assess the likely ultimate level of successful appeals. The percentage applied is judged to be within the range of likely outcomes, but towards the higher end of that range. Consideration has been given to applying a lower percentage, but this would expose the council to the risk of future loss without the provision to cover it, with the possibility that this could be for a significant amount.
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	

5. Were any specialised skills or knowledge used Advice from LG Futures. Procured through usual Council procurement procedure.

Accruals

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	Based upon actual invoices or purchasing system or where this isn't available best relevant estimates. No
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	Dependent on accrual type – most driven by invoices and system. Estimates on bills where information not available based on service and finance knowledge. No
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	From ledger and any relevant data / information No
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	No
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Journals are authorised and listings with supporting evidence kept

7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes – as based upon system and controls around financial system maintained.
8. Were any changes made to the key control activities this year? If so please provide details.	No
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Relatively small uncertainty as most based upon invoices / evidence of trends
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Again as based off invoice / trends most is actual cost based.

Fair Value loans – NOT APPLICABLE

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used?Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	

3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	
8. Were any changes made to the key control activities this year? If so please provide details.	
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	

10. How do management consider the	
sensitivity of the estimate to the methods and	
assumptions used and identify the range of	
reasonably possible outcomes for disclosure in	
the financial statements?	

Minimum Revenue Provision (MRP)

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
 2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change? 	Based upon accounting principles Yes – as agreed at budget setting 22/23 – move to annuity basis in most instances
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	Asset life based upon valuations. Costs are from ledger No
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	Information from ledger / valuers No

5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	Asset life from valuers where applicable
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Capital monitoring reported during year including financing
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes – reviewed in year and reported in quarterly reports plus feeds in to treasury management and capital strategies
8. Were any changes made to the key control activities this year? If so please provide details.	No
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Costs are based on actuals – assets lives from valuers. Relatively little uncertainty
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Asset lives can change but generally assumptions relatively fixed.

Pension Liability

Question	Management response

1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	No
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used? Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	Accounting estimates in respect of member data and payments into/out the scheme are made based on year to date actuals and management knowledge of future changes. Accounting estimates in terms of the actuarial process are made by Mercer. There were no changes to the accounting estimates made by the council.
3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	Advice is taken from the Actuary who provide their advice in two documents entitled "Pensions Accounting – Assumptions & Other Considerations" and "Pensions Accounting Employer Support". We then choose to accept this advice or offer alternative assumptions. We have chosen to accept the Actuarial advice for the 2022-23 financial year. Any changes to the assumptions and the rationale are set out in the above documents.
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	Source data is held by the Lancashire Pension Fund. There were no changes.
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	An Actuary (Mercer) is used. They are procured through the Lancashire Pension Fund although we have the option not to use them.
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	Payments made into and out of the scheme for employer and employee contributions are monitored on a monthly basis as part of the budget monitoring process. A month 10 data check is carried out on the figures provided by the Lancashire Pension Fund which is then supplied to the Actuary.

7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	Yes – the month 10 data check should ensure consistency and any estimations made by the Actuary are supplied in advance which we have the option to check and challenge.
8. Were any changes made to the key control activities this year? If so please provide details.	No
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	Reliance on the specialist knowledge and independent nature of the Actuary.
10. How do management consider the sensitivity of the estimate to the methods and assumptions used and identify the range of reasonably possible outcomes for disclosure in the financial statements?	Sensitivity to the major assumptions, and the financial impact they could potentially have are reported in the Statement of Accounts within note 37 – Defined Pension Scheme.

Credit loss – NO NEED TO COMPLETE AS PER MRINAL KAPOOR.

Question	Management response
1. Were any risks identified relating to the material accuracy of this accounting estimate for the financial year and, if so, how were these risks addressed?	
2. How do management select, or design, the methods, used in respect of this accounting estimate, including the models used?Were any changes made to these methods or models in 2022/23, and if so what was the reason for the change?	

3. How do management select the assumptions used in respect of this accounting estimate? Were any changes made to these assumptions in 2022/23, and if so what was the reason for the change?	
4. How do management select the source data used in respect of this accounting estimate? Were any changes made to this source data in 2022/23, and if so what was the reason for the change?	
5. Were any specialised skills or knowledge used in respect of this accounting estimates, and if so how were these specialist skills procured?	
6. How do management monitor the operation of control activities in relation to this accounting estimates, including the control activities at any service providers or management experts?	
7. In management's opinion, are their adequate controls in place over the calculation of this accounting estimate, including those at any service provider or management expert used, and if so how is the robustness of the key controls assessed?	
8. Were any changes made to the key control activities this year? If so please provide details.	
9. How do management consider the estimation uncertainty related to this accounting estimate and address this uncertainty when selecting the point estimate to use?	

10. How do management consider the
sensitivity of the estimate to the methods and
assumptions used and identify the range of
reasonably possible outcomes for disclosure in
the financial statements?



Report of	Meeting	Date
Director (Finance)	Governance Committee	Wednesday, 24 May 2023

CIPFA Resilience Index

Is this report confidential?	No
Is this decision key?	No
Savings or expenditure amounting to greater than £100,000	No

Purpose of the Report

To present to the Governance Committee the latest CIPFA Resilience Index (2021/22) 1. compared to the previous published indices.

Recommendations

2. The Governance Committee are asked to note the index and the continued strong position of the Council.

Reasons for recommendations

3. The index compares key financial indicators with other Local Authorities and the results are intended to provide assurance to the Governance Committee.

Other options considered and rejected

4. Not applicable.

Corporate priorities

The report relates to the following corporate priorities: 5.

Involving residents in improving their local area and equality of access for all	A strong local economy
Clean, safe and healthy communities	An ambitious council that does more to meet the needs of residents and the local area

Background to the report

- 6. An online index was released by CIPFA (Chartered Institute of Public Finance and Accountancy) in December 2019 to show the levels of financial resilience of each Local Authority across England.
- 7. The index is intended to help to ensure the sector is held to collective and robust standards of governance and financial management.
- Indicators used in the index include levels of reserves, external debt and ratios of 8. income and expenditure.
- 9. These measures are intended to provide a rounded picture of an authority's resilience to financial shocks.
- 10. Whilst the index is intended to support Local Authorities in conducting their long term resilience assessments it is important to remember that it forms only one part of that judgement. Local context must also be taken into account when forming an overall picture of resilience.
- 11. The index is based upon statistical returns submitted by Local Authorities and it should be recognised that data quality / consistency will be an issue as different organisations will undoubtedly have different approaches to completing these.
- The index is valid however in making overall comparisons and comparing trends 12. between years.
- 13. CIPFA have now released the 2021/22 index; this is analysed in the report and compared against data from previous years.

THE INDICATORS

14. The 8 indicators applicable to District Councils are as follows;

INDICATOR	DEFINITION
Reserves Sustainability Measure	Ratio between the current level of reserves and the average change in reserves in each of the past 3 years.
	A negative value (which implies reserves have increased) or one greater than 100, have been recoded to 100).
	(A higher figure indicates stronger resilience)
Level of Reserves	Ratio of current level of reserves to the council's net revenue expenditure.
	(A higher figure indicates stronger resilience)
Change in Reserves	Average % change in Reserves over the past 3 years
	(A higher, positive figure indicates stronger

	· · · · · · · · · · · · · · · · · · ·
	resilience)
Interest Payable / Net Revenue	Ratio of Interest Payable to Net Revenue
Expenditure	Expenditure
	(A lower figure indicates stronger resilience)
	(A lower lighte indicates stronger resilience)
Gross External Debt	Compares gross external debt held by a council
Fees and Charges to Service	Proportion of fees and charges against the
Expenditure Ratio	council's total service expenditure
	(Measures dependency on fees and charges
	and also how effective the council has been in
	generating income in this way)
Council Tax Requirement/Net Revenue	Ratio of council tax as a proportion of net
Expenditure	expenditure
	(Measures dependency on Council Tax and how
	effective the council has been in moving away
	from dependency on grants and funding from
	central government)
Growth Above Baseline	Difference between the baseline funding level and retained business rates income, over the
	baseline funding level
<u>•</u>	

CHORLEY PERFORMANCE

- 15. The indicators are available for all authorities in the country and can be selected individually or by reference to;
 - Upper Tier or Lower Tier and then by,
 - County Councils/ London Boroughs/ Metropolitan Districts/ Non-Metropolitan Districts/ Unitaries OR Nearest Neighbour
- 16. For the purposes of this comparison, Chorley has been compared to their "Nearest Neighbours". The CIPFA Nearest Neighbour Model adopts a scientific approach to measure the similarity between authorities taking into account a range of economic, social and physical characteristics.
- 17. The Nearest Neighbour Grouping has been revised by CIPFA in the 2021/22 index and is now as follows;

Amber Valley Braintree Broxtowe Charnwood (new for 2021/22) Chorley Erewash

Gedling

High Peak

Hinckley & Bosworth

Newark & Sherwood

Rossendale

South Derbyshire

South Kesteven (new for 2021/22)

South Ribble

Stroud

Kettering and *Stafford* were in the grouping for 2020/21, however have been removed for 2021/22

- 18. The indicators are outlined in the attached charts; compared with previous years.
- 19. It should be noted that on some graphs the scale has changed between years.

CONCLUSION

- 20. There has not been a significant shift in either the scale of the Council's indicators, or their position in the "rankings" of the comparator Group.
- 21. The indicators continue to highlight the Council is in a <u>strong</u> position.
- 22. The indicators highlight that despite recent ambitious investment, Chorley is by no means an "outlier" in terms of debt / interest payable. Further, the indicators highlight that the Council generates healthy levels of fees and charges as a result of this investment.

Climate change and air quality

23. The work noted in this report does not impact the climate change and sustainability targets of the Council's Green Agenda and all environmental considerations are in place.

Equality and diversity

24. Not applicable.

Risk

25. The analysis provides assurance that the Council is in a strong financial position and resilient to financial risks.

26. Members should note however that there are significant financial challenges ahead in terms of pay & price inflation, customer demand and potential changes to the funding / business rates mechanism for Local Authorities.

Comments of the Statutory Finance Officer

- 27. There are no direct financial implications arising from this report.
- 28. The report presents the financial standing of the council based on the figures included in the 2021/22 statutory returns for Chorley in comparison to a group of councils who CIPFA deem to be the best comparator group based on similarities across a range of economic, social and physical characteristics.

Comments of the Monitoring Officer

29. No further comments in addition to above.

Background documents

There are no background papers to this report.

Appendices

Appendix A – Comparison of Resilience Indices

Report Author:	Email:	Telephone:	Date:
Steve Kenyon (Interim Deputy Director of Finance)	steve.kenyon@chorley.gov.uk	01257 515151	26 th April 2023

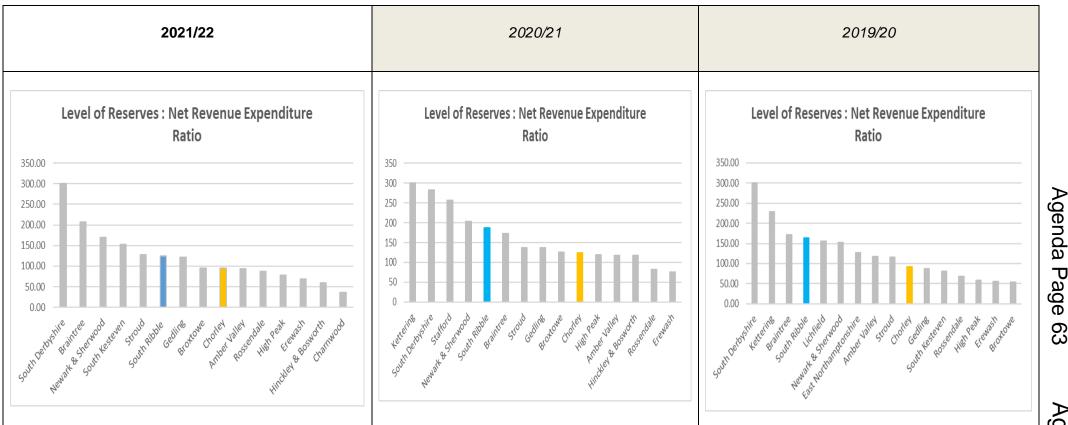
1. Reserves Sustainability Measure



The charts highlight a continuing strong level of reserves (maximum level on chart), with growth over the last 3 years for the Council.

APPENDIX A

2. Level of Reserves



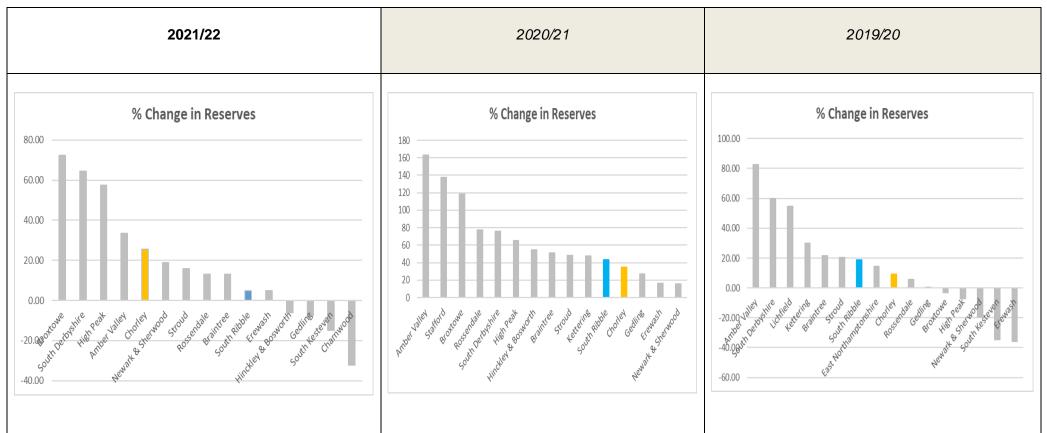
Overall rankings are broadly similar between the two years. The levels within the charts highlight reserves peaked in 2020/21 as a result of Covid Funding carried forward from 2019/20; this has subsequently been spent in line with Grant conditions.

Of the 180 districts, against this indicator Chorley holds reserves (Earmarked and Unallocated excluding Covid grants and S31 Business Rate grants) equivalent to 94.86% of it's annual Net Revenue, ranking them the 149th highest accordingly.

In comparison to the 12 Districts in Lancashire, Chorley had the 7th highest level of reserves compared to net revenue.

1

3. Change in Reserves

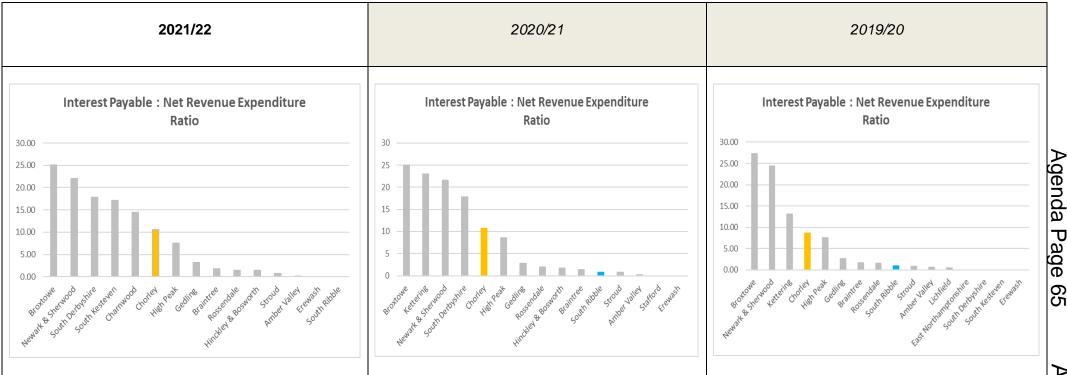


The chart highlights that the Council has consistently grown its level of reserves, whereas other Authorities in the group has seen their reserves decline.

The increase for 2020/21 is due to unspent Covid Funding carried forward.

The increase in 2021/22 is a result of money being set aside at year end to fund investment projects in 2022/23 e.g. IT infrastructure and the Green Agenda.

4. Interest Payable/Net Revenue Expenditure

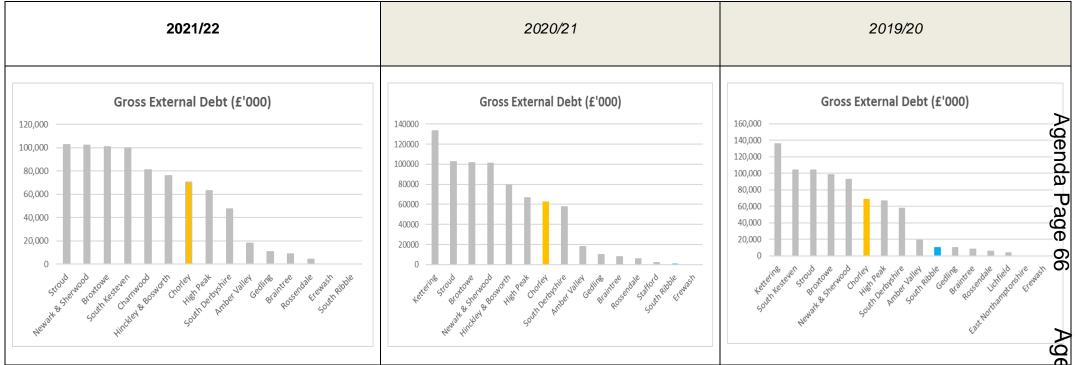


A high level of interest payable compared to Net Revenue Expenditure would be indicative of high levels of borrowing and/or loans taken out at high rates of interest. Overall rankings are broadly similar over the period.

Chorley continue to feature quite highly in the group, however an increasing number year on year have higher levels of debt. The level of debt is indicative of recent capital projects e.g. Logistics House, Market Walk, Strawberry Fields; all of which generate significant revenue income streams for the Council.

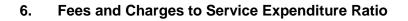
Considering the level of Interest Payable as a % of Net Revenue (i.e. as a measure of indebtedness), Chorley was 10.52% of net revenue, ranking them 58th highest level across all 180 District councils. In comparison to the 12 Districts in Lancashire, Chorley had the 2nd highest level of interest payable compared to net revenue.

5. **Gross External Debt**



Once again, overall rankings are broadly unchanged between the two years.

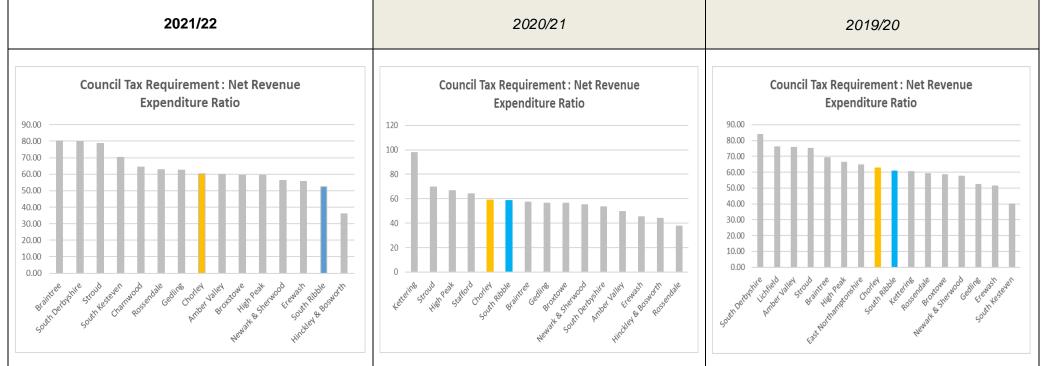
Despite embarking upon a number of large schemes (Logistics House, Market Walk, Strawberry Fields), Chorley's debt is not out of step with the rest of the comparator group - suggesting most Councils are undertaking regeneration / income generation / invest to save capital schemes.





Chorley continues to demonstrate strong performance in terms of the Fees & Charges it generates; this is indicative of the capital investment undertaken by Chorley, and the rental income it generates.

7. Council Tax Requirement/Net Revenue Expenditure

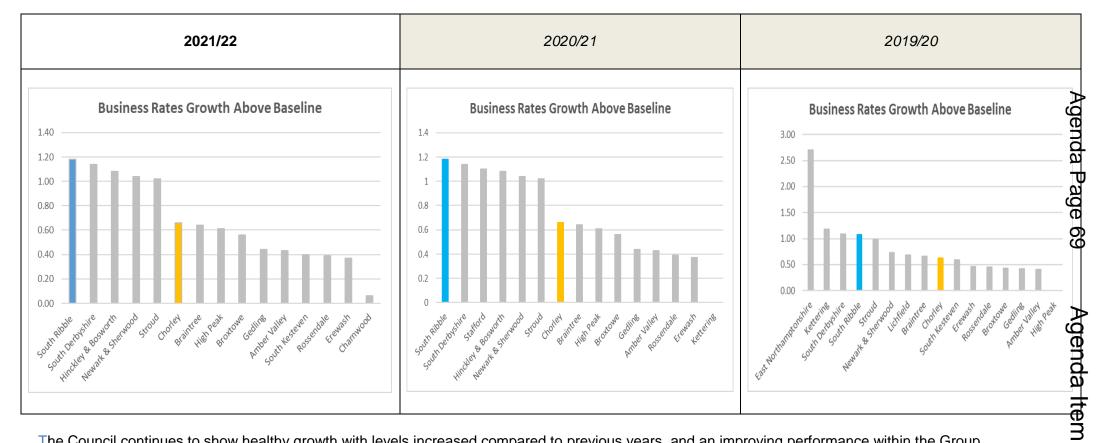


The graph above shows the level of Net Revenue Expenditure funded by Council Tax; the lower the percentage, the higher the dependency on government funding.

The data is not a comparison of the absolute levels of Council Tax, rather it relates to the overall Council Tax yield (i.e property numbers x Council tax rates)

The Council has fallen back slightly in the rankings, however displays a slightly increased percentage, highlighting a continuing strong Council Tax Base.

Growth Above Baseline 8.



The Council continues to show healthy growth with levels increased compared to previous years, and an improving performance within the Group.

7

Agenda Page 70 Agenda Item 7

Council

Report of	Meeting	Date
Chief Finance Officer	Governance Committee	24/05/23

CHARITY AND TRUST ACCOUNTS 2022/23

PURPOSE OF REPORT

1. To present for approval the accounts for the year ended 31 March 2023 for charities and trusts for which the Council is the sole trustee.

RECOMMENDATION(S)

2. That the accounts presented in Appendix A to E be approved.

EXECUTIVE SUMMARY OF REPORT

The Council's Statement of Accounts 2022/23 does not include a Trust Funds disclosure but 3. as an alternative, figures are presented in this report, which therefore provides an opportunity of providing more detail about each charity or trust.

Confidential report	Yes	Νο
Please bold as appropriate		

CORPORATE PRIORITIES

4. This report relates to the following Strategic Objectives:

Involving residents in improving their local area and equality of access for all	A strong local economy	
Clean, safe and healthy communities	An ambitious council that does more to meet the needs of residents and the local area	

BACKGROUND

- As part of the process of decluttering the Council's Statement of Accounts in 2015/16, the 5. previous Trust Funds note was omitted. Figures relating to the trusts were not material, and inclusion of the note in the statement would not improve users' understanding of the Council's financial position. Excluding the note from the statement means that the external auditors have not been obliged to audit it.
- 6. Having decided to exclude the note from the 2022/23 Statement of Accounts, this report gives Governance Committee members the opportunity to review and approve the accounts for each of the charities or trusts, presented as Appendix A to E. A brief summary of the financial performance of each charity or trust is presented in the following paragraphs. There is no statutory requirement for the accounts to be audited. Figures are not rounded so that all transactions can be seen in full. The note to the accounts had figures rounded to the nearest thousand pounds, which means that low value transactions were not visible.

7. Three of the charities or trusts hold external investments. No sums have been disinvested and reinvested, but the market value of investments varies from year to year. Such changes in market value are reflected in the relevant accounts.

EDWARD MCKNIGHT MEMORIAL FUND

8. This fund was established many years ago to pay for educational lectures in memory of Edward McKnight, Chorley's first librarian, who died in 1911. It has a cash balance, held by Chorley Council, which receives interest at the average rate earned on the Council's investments. It has not incurred any expenditure for many years. Its accounts are presented as Appendix A. These show that cash held for the fund as at 31 March 2023 was £5,412.52.

WILLIAM COCKER CHARITY

9. The William Cocker Charity is not registered with the Charity Commission, and there is no need to do so because of its low turnover. It was established for the provision of recreation grounds in Chorley, and the interest earned on its external investment is paid to Chorley Council for that purpose. Appendix B presents the accounts for the charity.

PROCEEDS OF SALE OF FORMER FREE LIBRARY

- 10. This registered charity was established in 1992 using the proceeds of the sale of the Avondale Road Library, previously known as the Free Library. The objects of the charity are such charitable purposes for the general benefit of the inhabitants of Chorley.
- 11. The main source of income is interest on the charity's external investments, but Chorley Council also pays interest (at the average rate earned on its investments) on the cash balance it holds for the charity. The balance held by the Council was £21,711.35 as at 31 March 2023, and all figures are presented in the accounts in Appendix C.

W B PARK'S CHARITY

12. It is understood that W B Park's Charity was established for the extension of the Infectious Diseases Hospital, Withnell. The Council holds a cash balance of £1,704.89 for the charity, which does not have interest added because of the difficulty of applying the charity's resources to an appropriate purpose. It is not a registered charity, and its accounts are presented as Appendix D.

H T PARKE'S BATHS FUND

13. The H T Parke's Baths Fund was established for the maintenance of Brinscall Baths. The interest earned on its external investment is paid to Chorley Council for that purpose. The fund is not registered as a charity. Appendix E presents its accounts for 2022/23.

IMPLICATIONS OF REPORT

14. This report has implications in the following areas and the relevant Directors' comments are included:

Finance	 Customer Services	
Human Resources	Equality and Diversity	
Legal	Integrated Impact Assessment required?	
No significant implications in this area	Policy and Communications	

COMMENTS OF THE STATUTORY FINANCE OFFICER

15. This report has replaced the disclosure note previously presented (i.e. prior to 2015/16), in the Council's annual Statement of Accounts, and it gives members the opportunity to review and query performance of each charity or trust before approving their accounts.

COMMENTS OF THE MONITORING OFFICER

16. The Monitoring Officer has no comments.

Louise Mattinson

DIRECTOR OF FINANCE OFFICER (Section 151 Officer)

Background Papers				
Document	Date	File	Place of Inspection	
n/a				

Report Author	Ext	Date	Doc ID
Jean Waddington	5151	27/04/2023	Charity and Trust Accounts 2022-23

Appendix A

	Receipts & payments account for the year ended 31 March 2023	
2021/22 £		2022/23 £
	Receipts	
8.09	Interest on cash held by Chorley Council	8.11
8.09	Total receipts	8.11
	Payments	
	No expenditure in year	
0.00	Total payments	0.00
8.09	Net receipts/(payments)	8.11
5,396.32	Bank and cash at the start of the period	5,404.41
5,404.41	Bank and cash at the end of the period	5,412.52

Edward McKnight Memorial Fund

	Statement of assets and liabilities at 31 March 2023	
31 March 2022 £		31 March 2023 £
	Cash assets	
5,404.41	Cash held by Chorley Council	5,412.52
5,404.41	Total cash assets	5,412.52
5,404.41	Total assets	5,412.52

Appendix B

	Receipts & payments account for the year ended 31 March 2023	
2021/22 £	Receipts	2022/23 £
58.56	Interest on investments Dividends from investments	25.12
58.56	Total receipts	132.84 157.96
	Payments	
(58.56)	Provision of recreation grounds in Chorley (paid to Chorley Council)	(157.96)
(58.56)	Total payments	(157.96)
0.00	Net receipts/(payments)	0.00
0.00	Bank and cash at the start of the period	0.00
0.00	Bank and cash at the end of the period	0.00

Statement of assets and liabilities at 31 March 2023		
31 March 2022 £		31 March 2023 £
	Other assets	
3,938.63	External investments	3,751.67
3,938.63	Total other assets	3,751.67
3,938.63	Total assets	3,751.67

Appendix C

Proceeds of Sale of Former Free Library (registered charity 1010457)

	Receipts & payments account for the year ended 31 March 2023	
2021/22 £	Receipts	2022/23 £
3,618.39 20.90	Dividends/interest on investments Interest on cash held by Chorley Council	4,118.03 26.35
3,639.29	Total receipts	4,144.38
	Payments	
0.00	Total payments	0.00
3,639.29	Net receipts/(payments)	4,144.38
13,927.68	Bank and cash at the start of the period	17,566.97
17,566.97	Bank and cash at the end of the period	21,711.35

	Statement of assets and liabilities at 31 March 2023		
31 March 2022 £		31 March 2023 £	
	Cash assets		
17,566.97	Cash held by Chorley Council	21,711.35	
17,566.97	Total cash assets	21,711.35	
	Other assets		
122,291.16	External investments	117,138.64	
122,291.16	Total other assets	117,138.64	
139,858.13	Total assets	138,849.99	

Appendix D

W B Park's Charity

	Receipts & payments account for the year ended 31 March 2023	
2021/22		2022/23
£	Receipts	£
	No income in year	
0.00	Total receipts	0.00
	Payments	
	No expenditure in year	
0.00	Total payments	0.00
0.00	Net receipts/(payments)	0.00
1,704.89	Bank and cash at the start of the period	1,704.89
1,704.89	Bank and cash at the end of the period	1,704.89
1,704.00		1,704.00

	Statement of assets and liabilities at 31 March 2023		
31 March 2022 £		31 March 2023 £	
	Cash assets		
1,704.89	Cash held by Chorley Council	1,704.89	
1,704.89	Total cash assets	1,704.89	
1,704.89	Total assets	1,704.89	

Appendix E

	H T Parke's Baths Fund	
	Receipts & payments account for the year ended 31 March 2023	
2021/22		2022/23
£	Receipts	£
58.20	Interest on investments	76.40
58.20	Total receipts	76.40
	Payments	
(58.20)	Maintenance of Brinscall Baths (paid to Chorley Council)	(76.40)
(58.20)	Total payments	(76.40)
0.00	Net receipts/(payments)	0.00
0.00	Bank and cash at the start of the period	0.00
0.00	Bank and cash at the end of the period	0.00

	Statement of assets and liabilities at 31 March 2023					
31 March 2022 £		31 March 2023 £				
	Other assets					
2,198.19	External investments	1,890.21				
2,198.19	Total other assets	1,890.21				
2,198.19	Total assets	1,890.21				



Report of	Meeting	Date
Head of Audit and Risk	Governance Committee	Wednesday, 24 May 2023

Internal Audit Effectiveness Review

Is this report confidential?	No
Is this decision key?	No

Purpose of the Report

 This report relates to the results of the self-assessment carried out by Internal Audit against the requirement of the Public Sector Internal Audit Standards (PSIAS) and Local Government Application Note (LGAN) as a means of assessing the effectiveness of Internal Audit.

Recommendations

2. That the Committee notes the results of the self -assessment recently undertaken as part of the Governance Committee's consideration of the system of internal control.

Reasons for recommendations

3. Evidence that the Council has an effective Internal Audit Service.

Other options considered and rejected

4. None.

Corporate priorities

5. The report relates to the following corporate priorities: (Please bold one)

Housing where residents can live well	A green and sustainable borough
An enterprising economy with vibrant local centres in urban and rural areas	Healthy, safe and engaged communities

Background to the report

- 6. The Accounts and Audit (England) Regulations 2015 requires that the relevant body, at least once in a year, to conduct a review of the effectiveness of its system of internal audit. The purpose behind the review is to ensure that the opinion in the annual report by the Head of Audit / Chief Audit Executive (CAE) can be relied upon as a key source of evidence in the Annual Governance Statement.
- 7. The Public Sector Internal Audit Standards came into effect on the 1st April 2013 and are applicable to the whole of the public sector. A Local Government Application Note was produced by CIPFA in collaboration with the Chartered Institute of Internal Auditors as a sector specific requirement within the PSIAS framework. The LGAN was re-issued in 2019 with minor amendments.
- One of the Attribute Standards within the PSIAS refers to a Quality Assurance and 8. Improvement Programme (QAIP) which must comprise both internal and external assessments. This has been recently been reviewed and is included at Appendix A.
- 9. The QAIP states that internal assessments are both on-going and periodic, whilst an external assessment must be undertaken at least once every five years. External assessment can be in the form of a full external assessment or a self-assessment with independent external validation. The majority of Lancashire districts made the decision to continue with the annual self-assessment to be independently verified by a peer review. The last external assessment was conducted in April 2018 and reported to the Governance Committee with the next review scheduled for completion in June 2023.

Annual Assessment

- In order to meet the requirements of the Accounts and Audit Regulations, a self-10. assessment has been carried out by the Service Lead Audit and Risk using the checklist contained within the revised LGAN. The LGAN states that if the periodic assessment is in the form of a self-assessment, the checklist contained within the guidance should be used for assessing conformance as it covers both the PSIAS and the LGAN.
- 11. The self-assessment is attached at **Appendix B** to this report. This demonstrates that the Service conforms with the Standards. There are 135 aspects of conformance, of which full conformance has been achieved for 129. There are 5 areas which are not applicable to the Internal Audit Service with only one area of partial conformance.
- The Action plan at Appendix C shows the identified actions from the 2023 self-12. assessment. There is only the one action being carried forward to 2023 for the one area of partial conformance.

Climate change and air quality

The work noted in this report does not impact on the Councils Carbon emissions and 13. the wider Climate Emergency and sustainability targets.

Equality and diversity

14. The material presented and discussed in this report has no direct implications on equality and diversity.

Risk

15. Failure to undertake the annual self-assessment against the PSAIS and LGAN will leave the Council unable to demonstrate that the Internal Audit Service conforms with the expected Standards.

Comments of the Statutory Finance Officer

16. No comment.

Comments of the Monitoring Officer

17. No comment.

Background documents

Public Sector Internal Audit Standards

Local Government Application Note

Appendices

Appendix A – Quality Assurance and Improvement Programme Appendix B - Self Assessment

Appendix C – Action Plan

Report Author:	Email:	Telephone:	Date:
Dawn Highton (Head of Audit and Risk)	dawn.highton@chorley.gov.uk	01772625625	10.5.23

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QUALITY ASSURANCE & IMPROVMENT PROGRAMME

April 2023



INTRODUCTION

The PSIAS require the Chief Audit Executive to develop and maintain a Quality Assurance and Improvement Programme (QAIP) to enable the internal audit activity to be assessed against the PSIAS (ie Definition of Internal Auditing, the Code of Ethics and the Standards themselves) for conformance.

The Accounts and Audit Regulations 2015 require a relevant authority to conduct a review each financial year of the effectiveness of the system of internal control. Since Internal Audit is a significant component of internal control, it is appropriate for an annual review to be conducted of the effectiveness of internal audit.

The PSIAS require that the QAIP must include both internal and external assessments. Internal assessments are both ongoing and periodical whilst external assessments must be undertaken at least once every five years.

Internal Assessments:

Ongoing Assessment

This requires the CAE to establish policies and procedures to guide staff in the conduct of their duties to ensure they conform to the PSIAS. This is achieved in the following ways:

- The Quality System includes procedures which are maintained by the Chief • Audit Executive to provide staff with detailed information regarding the various elements of the audit process. This is contained on the Shared Drive.
- The Quality system and associated documents not only explains about the audit process but also the way in which the Shared Internal Audit Service conducts itself, how work is recorded using an electronic record management system for evidencing and recording audit work and maintaining audit files
- These policies and procedures are updated on an ongoing basis through the issue of update messages to the staff with the content being updated within the Quality system.
- The Quality system contains references to the audit planning process and how the annual audit plan is produced and approved by Governance Committee. Once approved, the CAE then allocates the plan amongst the auditors. This is usually based on a combination of factors; namely familiarity with the audit activity, the auditor has some existing knowledge of the service. However, the CAE has to be aware of other factors here:
 - o over familiarity with the service which may lead to complacency
 - o the need to provide audit staff with variety in their work
 - the need to ensure the audit work is commensurate with the skills and experience and competence of the auditor concerned
- The CAE ensures that the audit review has been undertaken in accordance with the Quality system and that all necessary aspects of the audit have been

carried out and the findings and conclusions within the report are supported by appropriate evidence.

- A review process in which the CAE / Senior Auditor considers the audit working papers and report and raises any queries with the auditor carrying out the review.
- Satisfaction Surveys (Assignment level) are issued with the Final Audit report and are issued to the lead contact. These seek feedback about various aspects of the audit, the auditor's approach and the usefulness of the audit.
- A set of Performance Indicators designed to give an indication of the success • in the delivery of the service. The following indicators are maintained:

Performance Indicator	Target
% of planned time used	90%
% audit plan completed	90%
% satisfaction rating (assignment level)	90%
% of agreed actions implemented by management	90%

Service Development.

The Shared Internal Audit Service develops through various means including:

- Institute of Internal Auditors – information is regularly received by email of relevant courses put forward by the IIA.
- North West and North Wales Regional Audit Group events seminars and weekend events designed to keep auditors up to date and identify potential improvements
- Other courses short courses offered by a range of training providers.

In addition, on an annual basis, a Business Plan is compiled and approved. This contains individual projects to improve the Internal Audit Service and progress against these is monitored through the year.

Internal Performance Reviews.

The Shared Internal Audit Service complies with the corporate management performance framework. This comprises of the automated performance review process, three times per annum and regular meetings (121s) with their immediate line manager.

Periodic Assessment

The periodic assessment is in the form of a PSIAS self-assessment which is completed annually by the CAE. This is challenged internally by the Corporate Governance Group. Following this, the self-assessment is reported to Governance Committee in May who are asked to note the results as part of the Committee's consideration of the system of internal control (Ref: Accounts and Audit Regulations 2015). The conclusion regarding conformance with the Standards then forms part of the authority's Annual Governance Statement.

Any significant areas of non-compliance with the PSIAS that are identified through the self-assessment will be reported in the Annual Report and used to inform the Annual Governance Statement.

External Assessments

The requirement for an external assessment to be carried out at least once every five years can be satisfied by either arranging for a full external assessment, carried out by a person(s) from outside the organisation, or a self-assessment with external validation.

Approach

In March 2014, the Governance Committee confirmed that the approach to be taken for the external assessment would be a self-assessment with external validation using a Peer Review approach amongst the Lancashire districts.

The Lancashire districts have appointed a Subgroup to determine the exact approach to be adopted and they have developed a Memorandum of Understanding setting out the approach together with a draft format of a report. A timetable has been developed for those authorities who have agreed to participate, leading up to March 2023 by when all reviews must be completed in order to meet the five year requirement.

Scope of the Assessment

The external validation will consist of a broad scope of coverage primarily designed to assess the extent of conformance with the Standards. This will be determined through an examination of a range of documentation including the Internal Audit Charter, the Audit Plan, its policies, procedures and practices.

The assessment will also comprise completion of a questionnaire and short interviews with key officers within the council, designed to assess the quality of relationship that internal audit has with its customers. In other words, the review will look beyond the simple checklist approach seek to identify the extent to which internal audit adds value to the organisation.

The outcome of the review will be a written report containing an action plan in response to any significant comments and recommendations that may be identified.

Any significant areas of non-compliance with the PSIAS that are identified through the self-assessment will be reported in the Annual Report and used to inform the Annual Governance Statement.

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS Agenda Page 87 Agenda Item 9 Appendix B

Questions to consid	Evidence	/ comments		
1 Mission of Interna	al Audit			
Based on your review of conformance with other requirements of the Public Sector Internal Audit Standards (PSIAS) and Local Government Application Note (LGAN), does the internal audit activity aspire to accomplish the Mission of Internal Audit as set out in the PSIAS?			wi Ch	rangements set out thin Internal Audit arter. Annual Audit an and Opinion.
To enhance and prot objective assurance,				
CONFORMS	PARTIAL	1		

Questions to consid	Eviden	ce / comments			
2 Definition of Inter	rnal Auditing				
Based on your review of conformance with other requirements of the PSIAS and LGAN, is the internal audit activity independent and objective?				Arrangements set out within Internal Audit	
CONFORMS	PARTIAL	NOT CONFORMING	- Charter. Financial Procedure Rules.		
Based on your review of conformance with other requirements of the PSIAS and LGAN, does the internal audit activity use a systematic and disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes within the organisation?				The Internal Audit Manual and associated procedures	
CONFORMS	PARTIAL				

Questions to consid	er	Evidence / comments	
3 Core Principles			
and provide a basis for the attribute standar partial conformance Government Applicat have regard to position	caken as a whole, articula or considering whether the rds and performance star or non-conformance with tion Note. In making this we evidence of conforma on- conformance where		
Where there are insta particular areas, you materiality and other audit activity CONFO judgments should be			
(Integrity, Seven Prir	r review of conformance nciples of Public Life), do y fully CONFORMS with	 All members of IA team professionally qualified and comply with awarding bodies Code of Ethics. Staff declarations. 	
CONFORMS	PARTIAL	Register of Interest	

Questions to consider			Evider	ce / comments
Demonstrates competen	ce and due professional	care.	✓	
Having regard to your revie (Competence, Confidentia	✓	awarding bodies Code of Ethics Specialist skills procured		
evidence from the review of conformance with Standards, do you consider that the internal audit activity fully CONFORMS with the PSIAS and LGAN by demonstrating competence and due professional care?			✓ ✓	when required (ICT) Experienced Audit Team Audit Manual and
CONFORMS	PARTIAL	NOT CONFORMING		procedures
Is objective and free from	n undue influence (inde	pendent).		Internal Audit Charter
Having regard to your revie (Objectivity, Seven Princip review of conformance with audit activity fully CONFO and free from undue influe	les of Public Life) and any th standards, do you cons RMS with the PSIAS and	y other evidence from the ider that the internal	× ×	Annual Report and Opinion
CONFORMS	PARTIAL	NOT CONFORMING		
Aligns with the strategie organisation. Based on your review of co	-		✓	Risk assessment based upon current risks and objectives of the organization / service.
the internal audit activity being aligned with the stra	•	isks of the organisation?	✓	Internal Audit Plan compiled following consultation with Managers and risk analysis. Plan approved by
CONFORMS	PARTIAL	NOT CONFORMING		Governance Committee
Is appropriately position Based on your review of co the internal audit activity appropriately positioned a	onformance with standard fully CONFORMS with the	ds, do you consider that e PSIAS and LGAN by being	- ✓ ✓	Organisational structure Audit Plan incl resources
CONFORMS	PARTIAL	NOT CONFORMING		
Demonstrates quality an	d continuous improvem	nent.		
Based on your review of co the internal audit activity demonstrating quality and	fully CONFORMS with th	e PSIAS and LGAN by	V	Internal Audit self- assessment reported to Governance Committee May 22 / May 23
CONFORMS	PARTIAL	NOT CONFORMING	V	Quality Assurance and Improvement programme.
Communicates effective	ely.			
Based on your review of conformance with standards, do you consider that the internal audit activity fully CONFORMS with the PSIAS and LGAN by communicating effectively?				Reporting arrangements as set out within the Audit Charter.
			-1	
CONFORMS	PARTIAL	NOT CONFORMING		

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS Agenda Page 89 Agenda Item 9 Appendix B

Based on your review of conformance with standards, do you consider that the internal audit activity fully CONFORMS with the PSIAS and LGAN by providing risk-based assurance, based on adequate risk assessment?			✓ ✓ ✓	
CONFORMS	PARTIAL	NOT CONFORMING	\checkmark	Corporate risk registers
Is insightful, proactive, ar Based on your review of co the internal audit activity f insightful, proactive, and fu	~	Internal Audit involvement with project teams providing proactive advice and guidance on risk, governance and		
CONFORMS	PARTIAL	NOT CONFORMING	✓	control (As per Internal Audit Plan). New and emerging risks considered during the risk assessment and within each individual audit
Promotes organisational	improvement.		✓ CAE member of Senior	
Based on your review of conformance with standards, do you consider that the internal audit activity fully CONFORMS with the PSIAS and LGAN by promoting organisational improvement?				CAE member of Senior Leadership Team and involvement with Corporate Governance Group identification of key areas
CONFORMS	PARTIAL	NOT CONFORMING	V	for improvement within the AGS following comprehensive review undertaken by IA. Individual Internal Audit Reports

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS

Questions to consid	er		Evidence / comments
4 Code of Ethics			
Integrity			
Based on your review	of conformance with ot	her requirements of the	
PSIAS and LGAN, do by:	you consider that intern	al auditors display integrity	 ✓ Quality Assurance and Improvement Programme
 by: Performing their work with honesty, diligence and responsibility? Observing the law and making disclosures expected by the law and the profession? Not knowingly partaking in any illegal activity nor engaging in acts that are discreditable to the profession of internal auditing or to the organisation? Respecting and contributing to the legitimate and ethical objectives of the organisation? 			 ✓ Satisfaction surveys ✓ Audit Charter – responsibilities ✓ Signed Declaration of interests ✓ Code of Conduct ✓ Professional Code of Ethics ✓ Audit Manual
CONFORMS	PARTIAL	NOT CONFORMING	
Objectivity Based on your review of conformance with other requirements of the PSIAS and LGAN, do you consider that internal auditors display objectivity by: Not taking part in any activity or relationship that may impair or be presumed to impair their unbiased assessment? Not accepting anything that may impair or be presumed to impair their unbiased assessment? Disclosing all material facts known to the that, if not disclosed, may distort the reporting of activities under review? CONFORMS PARTIAL			 Quality Assurance and Improvement Programme Satisfaction surveys Audit Charter – responsibilities Signed Declaration of interests Code of Conduct Professional Code of Ethics Audit Manual
 and LGAN, do you concerning by: Acting prudently duties and protection Not using information 	when using information ting that information? ation for any personal ga	her requirements of the PSIAS itors display due respect and acquired in the course of their in or in any manner that would e legitimate and ethical	 ✓ Quality Assurance and Improvement Programme ✓ Satisfaction surveys ✓ Audit Charter – responsibilities ✓ Signed Declaration of interests ✓ Code of Conduct ✓ Professional Code of Ethics ✓ Audit Manual

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS Agenda Page 91 Agenda Item 9 Appendix B

Competency				
 Based on your review of conformance with other requirements of the PSIAS and LGAN, do you consider that internal auditors display competence by: Only carrying out services for which they have the necessary knowledge, skills and experience? Performing services in accordance with the PSIAS? Continually improving their proficiency and effectiveness and quality of their services, for example through CPD schemes? 				All members of IA team are professionally qualified. Specialist skills procured when required (ICT) Experienced Audit Team On-going training and development (assessed through staff PDRs)
CONFORMS	PARTIAL	NOT CONFORMING		
Seven Principles of F	Public Life	1	✓ All members of IA team	
Based on your review of conformance with other requirements of the PSIAS and LGAN, do you consider that internal auditors, whether consciously or through conformance with organisational procedures and norms, have due regard to the Committee on Standards of Public Life's <i>Seven Principles of Public Life</i> ?				are professionally qualified and therefore comply with their awarding bodies Code of Ethics Annual declarations of interest Internal Audit Charter
CONFORMS	PARTIAL	NOT CONFORMING	√	Code of conduct

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS

Questions to consider	Evidence / comments		
Standards			
5 Attribute Standards			
5.1 1000 Purpose, Author	rity and Responsibility		
The questions in this sectio and responsibility of the in- defined consistent with the charter and periodically rev			
Does the internal audit cha formal definition of: the purpose the authority, and the responsibility of the internal audit activit Standards (PSIAS)?			 Internal Audit Charter ✓ Purpose (section 1) ✓ Authority (section 4) ✓ Responsibilities (section 7)
CONFORMS	PARTIAL	NOT CONFORMING	

Questions to consid	er		Evidence / comments
appropriately definin purposes of the inter	ted that the Governance	 ✓ Internal Audit Charter (Section 3.2) 	
CONFORMS	PARTIAL	NOT CONFORMING	
Does the internal au	dit charter also:		Internal Audit Charter
Set out the intern organisation?	al audit activity's positic	on within the	✓ Purpose (Section 1)
Establish the chie relationship with	f audit executive's (CAE) the board?	functional reporting	✓ Reporting (section 5)
CAE and those to applicable, this w	ountability, reporting line whom the CAE may repo ill need to encompass sh nal audit, and the role of	 ✓ Organisational independence and objectivity (section 5) 	
Establish the responsibility of the board and also the role of the statutory officers (such as the CFO, the monitoring officer and the head of paid service) with regards to internal audit?			 Independence & Objectivi
 Establish internal audit's right of access to all records, assets, personnel and premises and its authority to obtain such information and explanations as it considers necessary to fulfil its responsibilities? 			 ✓ Authority (section 4)
Define the scope of internal audit activities?			✓ Scope & Responsibilities
Recognise that int environment of the	ternal audit's remit exter ne organisation?	nds to the entire control	(section 6) ✓ Scope & Responsibilities
Establish the orga	anisational independenc	e of internal audit?	✓ Independence (section 5)
Cover the arrange	ements for appropriate re	esourcing?	Decremeihilities (section 7)
Define the role of	internal audit in any fra	ud-related work?	 ✓ Responsibilities (section 7)
	°	the organisation's anti- fraud CAE to be notified of all	✓ Scope of activities (section 6)
 Include arrangem 	ected fraud, corruption of nents for avoiding conflic Indertakes non-audit act	 ✓ Independence & Objectivi ✓ Scope & Responsibilities 	
Define the nature of assurance services provided to the organisation, as well as assurances provided to parties external to the organisation?			✓ Scope of Activities
Define the nature of consulting services?Recognise the mandatory nature of the PSIAS?			 ✓ Compliance with PSIAS (section 3)
	andatory nature of the PS	י כיעונ:	
CONFORMS	PARTIAL	NOT CONFORMING	-

Questions to o	consider		Evide	nce / comments
Does the CAE periodically review the internal audit charter and present it to senior management and the board for approval?			√	Reviewed and presented to Governance Committee March 21 / March 22
CONFORMS	PARTIAL			
5.2 1100 Inde	pendence and Objectiv	ity		
	pendent and internal au	onfirm that the internal audit ditors are objective in		
management a	nave direct and unrestrict nd the board? nave free and unfettered		~	As per Internal Audit Charter
communicate		f executive or equivalent and the	✓	As per Internal Audit Charter
CONFORMS	PARTIAL	NOT CONFORMING		
Does the CAE a	attend Governance comr	nittee meetings?	✓	CAE attendance and
Does the CAE o	contribute to Governance	e committee agendas?		participation at Governance committee meetings
CONFORMS	PARTIAL	NOT CONFORMING		5
 Are threats to objectivity identified and managed at the following levels: Individual auditor? Engagement? Functional? Organisation? 			* * *	Declaration of interests form Internal Audit Plan Internal Audit Charter (Independence) Code of Conduct
CONFORMS	PARTIAL	NOT CONFORMING	v	Code of Ethics
1110 Organis	ational Independence			
arrangements I objectivity. This is of partic	peen put in place that pr	eporting and management reserve the CAE's independence and he CAE is line-managed by		
Does the CAE report to an organisational level equal or higher to the corporate management team?			~	CAE reports to Director of Governance who is a member of the Shared
Does the CAE report to a level within the organisation that allows the internal audit activity to fulfil its responsibilities?			×	Senior Management Team Internal Audit Charter (reporting and monitoring)
CONFORMS	PARTIAL	NOT CONFORMING	✓ ✓	Financial Procedure Rules Organisation structure

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CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS

Questions to consid	er		Evidence / comments
 Does the CAE's position in the management structure: Provide the CAE with sufficient status to ensure that audit plans, reports and action plans are discussed effectively with the board? Ensure that he or she is sufficiently senior and independent to 			 ✓ Audit Plan reported to and approved by Governance committee . ✓ All final reports and action
	e credibly constructive ch		plans agreed and issued to Directors. ✓ Internal Audit Charter
CONFORMS	PARTIAL	NOT CONFORMING	✓ Organisation Structure
	n to the board, at least ar nisationally independent	nnually, that the internal t?	 ✓ Annual Audit Report
CONFORMS	PARTIAL	NOT CONFORMING	
L C	independence of internative of the cAE to the board?	•	Reports to Governance Committee indl:
	e CAE reports functionally ard: rnal audit charter	kamples of factors which y to the Board, which	Audit Plan (March 22 & September 22) Audit Charter (March 22) Audit Plan resources.
	rnal audit budget and re	source plan	Audit Interim reports (Sept/ Nov / Jan)
receives commun	ications from the CAE or elation to the plan, for ex	the activity's	Annual report incl opinion
 approves decision CAE 	s relating to the appoint	ment and removal of the	
approves the rem	uneration of the CAE		
seeks reassurance from management and the CAE as to whether there are any inappropriate scope or resource limitations.			
approval of CAE remu public sector, and tha independence of the	erpretation to PSIAS 1110 uneration does not gener at the underlying principle CAE must be safeguarded ormance assessment is n ubject to audit.		
taken to safeguard th remuneration or perf	therefore consider whet e independence of the C ormance assessment is n ubject to audit. This migh		
	nent of the chief executiv or feedback from the Gov		
CONFORMS	PARTIAL	NOT CONFORMING	

Questions to cons	ider	Evidence / comments	
1111 Direct Inter	action with the Boa	ırd	
Does the CAE com	municate and intera	ct directly with the board?	✓ As per Internal Audit Charter
CONFORMS	ORMS PARTIAL NOT CONFORMING		 Governance committee meetings and minutes / Chairs Brief Ad-hoc meetings All reports in Head of Service name
1112 Chief Audit	Executive Roles Be	yond Internal Auditing	
	s roles or responsibili uate safeguards in p objectivity?	I ✓ Internal Audit Charter includes safeguards	
Does the board pe	riodically review the		
CONFORMS	PARTIAL	NOT CONFORMING	

Questions to consider			Evidence / comments
1112 Chief Audit Executiv	e Roles Beyond Interno	al Auditing	
Where the CAE has roles or auditing, are adequate safe independence or objectivit	 ✓ Internal Audit Charter includes safeguards ✓ Internal Audit periodically 		
Does the board periodically	review these safeguards	?	reviewed and approved by
CONFORMS	PARTIAL	NOT CONFORMING	Governance Committee
1120 Individual Objectivi	ity	<u>^</u>	
Do internal auditors have a	n impartial, unbiased att	itude?	✓ Professional Code of Ethics
CONFORMS	PARTIAL	NOT CONFORMING	 Internal Audit Charter Satisfaction survey at end or each audit would likely indicate any difficulties Officer declarations
Do internal auditors avoid a actual?	any conflict of interest, w	hether apparent or	 ✓ Signed declaration of interests ✓ Professional code of ethics
CONFORMS	PARTIAL	NOT CONFORMING	
1130 Impairment to Inde	pendence or Objectivit	y	
If there has been any real o objectivity, has this been d nature of the impairment a management/the board as CONFORMS	_		
Does review indicate that w auditors have not assessed responsible within the prev	specific operations for w		 ✓ Internal Audit Charter ✓ Staff are experienced auditors and have had no operational responsibilities
CONFORMS	PARTIAL	NOT CONFORMING	
If there have been any asso also has operational respo by someone outside of the	 Review of Risk Management undertaken by external 3rd party to maintain independence 		
CONFORMS	PARTIAL	NOT CONFORMING	
Is the risk of over-familiarity or complacency managed effectively: for example by rotating assignments for ongoing assurance engagements and other audit responsibilities periodically within the internal audit team?			 Allocation of work based on skills, knowledge and experience of audit team, where possible responsibilities and assurance engagements are
CONFORMS	PARTIAL	NOT CONFORMING	periodically rotated.
Have internal auditors decla organisational requirements		nce with	 ✓ Signed declaration of interests forms.

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CONFORMS	PARTIAL	NOT CONFORMING	
Questions to consider			Evidence / comments
Where any internal auditor has accepted any gifts, hospitality, inducements or other benefits from employees, clients, suppliers or other third parties (other than as may be allowed by the organisation's own policies), has this been declared and investigated fully?			 None offered or accepted, however, process covered within Code of Conduct
CONFORMS	PARTIAL	NOT CONFORMING	
Does review indicate that no instances have been identified where an internal auditor has used information obtained during the course of duties for personal gain?			✓ None identified
CONFORMS	PARTIAL	NOT CONFORMING	
Have internal auditors disclosed all material facts known to them which, if not disclosed, could distort their reports or conceal unlawful practice, subject to any confidentiality agreements?			 ✓ Declaration of Interests signed by auditors ✓ Professional Code of Ethics
CONFORMS	PARTIAL	NOT CONFORMING	
If there has been any real or apparent impairment of independence or objectivity relating to a proposed consulting services engagement, was this disclosed to the engagement client before the engagement was accepted?			 No impairment of independence or objectivity noted
CONFORMS	PARTIAL	NOT CONFORMING	
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 board before the engagement was accepted?			 Any significant changes to the approved audit plan would be reported to the Governance committee for approval
CONFORMS	PARTIAL	NOT CONFORMING	

5.3 1200 Proficiend	y and Due Professio	nal Care	
proficiency and due	professional care, ha	ements are performed with ving regard to the skills and and how they exercise their	
1210 Proficiency			
	professional qualifica	ation, such as CMIIA/CCAB or	✓ CMIIA✓ Service Lead JD
Is the CAE suitably e	experienced?		✓ 10 years Head of Audit
CONFORMS	PARTIAL	NOT CONFORMING	experience
accordance with the Does the CAE ensure and responsibilities	e for recruiting appro organisation's human that up-to-date job o and that person speci petencies, skills, exper	 ✓ CAE fully responsible for recruitment. ✓ Up to date Job descriptions and person specifications e.g. Senior Auditor and Auditor posts 	
CONFORMS	PARTIAL	NOT CONFORMING	
Having regard to the answers to the other questions in this section and other matters, does the internal audit activity collectively possess or obtain the skills, knowledge and other competencies required to perform its responsibilities? Where the internal audit activity does not possess the skills, knowledge and other competencies required to perform its responsibilities, does the CAE obtain competent advice and assistance?			 ✓ Through in-house, external training courses, networking. ✓ Specialist skills for ICT audit bought in.
CONFORMS	PARTIAL	NOT CONFORMING	
	have sufficient know gements in the organ	ledge to evaluate the risk of fraud nisation?	 ✓ All auditors sufficiently experienced. ✓ Internal Audit procedures clearly specify the need to consider fraud risks.
CONFORMS	PARTIAL	NOT CONFORMING	
Do internal auditors technology risks an	have sufficient know d controls?	 ✓ Staff have a general knowledge. ✓ Specialist ICT service is 	
CONFORMS	PARTIAL	NOT CONFORMING	bought in for specific audits.
Do internal auditors have sufficient knowledge of the appropriate computer- assisted audit techniques that are available to them to perform their work, including data analysis techniques?			 ✓ Staff trained in use of IDEA Used primarily in Payroll and Creditors work.

Questions to consider	Evidence / comments		
1220 Due Professional Ca			
 Do internal auditors exercise due professional care by considering the: Extent of work needed to achieve the engagement's objectives? Relative complexity, materiality or significance of matters to which assurance procedures are applied? Adequacy and effectiveness of governance, risk management and control processes? Probability of significant errors, fraud, or non-compliance? Cost of assurance in relation to potential benefits? 			 Discussed and agreed with auditee / Engagement Plan Testing of controls to mitigate risks as part of audit work Through core audit work Management actions considered for practicality of implementation and discussed with auditee prior to agreement
In doing the above, interna technology-based audit an provide assurance.			
CONFORMS	PARTIAL	NOT CONFORMING	
Do internal auditors exercis engagement by considering	•	during a consulting	As above
Needs and expectations communication of engage			
 Relative complexity and engagement's objective 			
Cost of the consulting e			
CONFORMS	PARTIAL	NOT CONFORMING	

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS 101 Agenda Item 9 Appendix B

1230 Continuing Profes	sional Developme	nt		
Has the CAE defined the skills and competencies for each level of auditor? and Does the CAE periodically assess individual auditors against the predetermined skills and competencies?			✓ ✓ ✓	Job description for Senior Auditor and Auditor Staff Performance development reviews regularly undertaken Regular 1-1 discussions are held with each Auditor to discuss
CONFORMS PARTIAL NOT CONFORMING			G	performance / progress against reviews etc.
Do internal auditors undertake a programme of continuing professional development? and Do internal auditors maintain a record of their professional development and training activities?			✓ ✓	Work undertaken and on-going training helps to ensure requirements for CPD are met. The Corporate Learning Hub is utilized to hold all training data.
CONFORMS	PARTIAL	NOT CONFORMIN	łG	

5.4 1300 Quality As	surance and Improvem	ent Programme		
5.4 1300 Quality Assurance and Improvement Programme The questions in this section seek to confirm that the CAE has developed and maintained a Quality Assurance and Improvement Programme (QAIP) through which conformance with the PSIAS can be and is properly assessed.				
Has the CAE developed a QAIP that covers all aspects of the internal audit activity and enables conformance with all aspects of the PSIAS to be evaluated?Does the QAIP assess the efficiency and effectiveness of the internal audit activity and identify opportunities for improvement?Does the CAE maintain the QAIP? Are any statutory requirements for review of the internal audit activity satisfied?CONFORMSPARTIALNOT CONFORMING			✓ (✓ (Quality Assurance and Improvement Programme (QAIP) in place including performance indicators and quality control of audit work. QAIP periodically reviewed. Referenced in Review of Effectiveness of Internal Audit to Governance Committee (May 23)
1310 Requirements of the Quality Assurance and Improvement Programme				
Does the QAIP include both internal and external assessments? CONFORMS PARTIAL NOT CONFORMING			✓ :	Specified in the QAIP
1311 Internal Asse	ssments			
Does the CAE ensure that audit work is allocated to staff with the appropriate skills, experience and competence?				Reviews allocated on a quarterly basis and monitored through regular discussions with individual auditors Specified in the QAIP
CONFORMS	PARTIAL	NOT CONFORMING		Specified in the QAIP
Do internal assessments include ongoing monitoring of the internal audit activity, such as: Routine quality monitoring processes? Periodic assessments for evaluating conformance with the PSIAS?			√	CAE or Senior Auditor reviews each audit assignment and reports PSIAS checklist used for Annual Review of Effectiveness of IA
CONFORMS	ONFORMS PARTIAL NOT CONFORMING			 Specified in the QAIP

Questions to consider			Evidence / comments		
 Does ongoing performance improvement through the end of t		nce targets? tween them es? tation with evel agreement? rogress against	 ✓ Targets approved by Governance committee March 2022 ✓ Agreed part of Business planning ✓ To be included with every progress report to Governance committee ✓ Satisfaction survey issued following each review ✓ Review progress monitored at regular 121s 		
CONFORMS	PARTIAL	NOT CONFORMING	 Time Management System 		
Are the periodic self-assessments or assessments carried out by people external to the internal audit activity undertaken by those with a sufficient knowledge of internal audit practices? Sufficiency would require knowledge of the PSIAS and the wider guidance available such as the Local Government Application Note and/or IIA practice advisories, etc.			 Annual Self Assessments carried out by CAE Memorandum of understanding sets out criteria for external assessment carried out by Lancashire Heads of Audit 		
CONFORMS	PARTIAL	NOT CONFORMING	(Peer review)		
Does the periodic assessment include a review of the activity against the risk-based plan and the achievement of its aims and objectives?			 Reported to Governance committee in each progress report 		
CONFORMS	PARTIAL	NOT CONFORMING			
1312 External Assessmen	nts				
Has an external assessment been carried out, or is one planned to be carried out, at least once every five years? Has the CAE discussed the alternative approaches to external assessment with the board? This should reflect the relative costs of the different approaches, the potential advantages of an external viewpoint, and whether there are factors which might be considered to warrant a demonstrably independent assessment.			 ✓ External peer review carried out April 2018. ✓ Governance committee Report June 2018. ✓ Next external peer review planned for 2023 		
CONFORMS	PARTIAL	NOT CONFORMING			

Questions to consid	ler		Evide	nce / comments
Has the CAE properly discussed the qualifications and independence of the assessor or assessment team with the board? In doing this, the CAE should consider whether the assessor or assessment team has demonstrated its competence in both the professional practice of internal auditing and the external assessment process. Competence can be demonstrated through both experience and theoretical learning. Experience of similar organisations or sectors is more valuable than less relevant experience. In the case of an assessment team, not all members need to have all the competencies – it is the team as a whole that is qualified. If the capability of the assessor or assessment team is not immediately obvious, the CAE should document how they used professional judgement to decide whether this is sufficient to carry out the external assessment. If the assessor or assessment team has any real or apparent conflicts of interest with the organisation, this should be clearly explained to the board, and safeguards should be put in place to minimise the effect of this on the conduct of the external assessment.			~	Lancashire Heads of Audit and any impairments will be taken into account by the Sub Group who appoint the reviewers for each authority.
CONFORMS	PARTIAL	NOT CONFORMING		
Has the CAE agreed the scope of the external assessment with an appropriate sponsor, such as the chair of the Governance committee, the CFO or the chief executive? The CAE should also agree this scope with the external assessor or assessment team.			V	Memorandum of Understanding in place.
CONFORMS 1320 Reporting on	PARTIAL	NOT CONFORMING and Improvement		
 Programme Has the CAE reported the results of the QAIP to senior management and the board? Note that: the results of both external and periodic internal assessment must be communicated upon completion the results of ongoing monitoring must be communicated at least annually the results must include the assessor's or assessment team's evaluation with regards to the degree of the internal audit activity's conformance with the PSIAS. 			V	Review of the effectiveness of Internal Audit reported to Governance Committee (May 23) On-going monitoring included in interim reports to Governance Committee and Corporate Governance Group throughout the year including performance indicators.
CONFORMS	PARTIAL	NOT CONFORMING	1	
	1	1	1	

Questions to consider			Evidence / comments		
Has the CAE included the results of the QAIP and progress against any improvement plans in the annual report?			 ✓ Head of Audit Annual Report May 21 / May 22 May 22 		
CONFORMS	PARTIAL	NOT CONFORMING	May 23		
1321 Use of 'CONFORMS v Professional Practice of I		Standards for the			
Has the CAE stated that the internal audit activity CONFORMS with the PSIAS only if the results of the QAIP support this?			 ✓ Included within every Internal Audit Report 		
CONFORMS	PARTIAL	NOT CONFORMING			
1322 Disclosure of Non-co	onformance				
Has the CAE reported any instances of non-conformance with the PSIAS to the board?			 ✓ Annual Report 		
CONFORMS	PARTIAL	NOT CONFORMING	-		
If appropriate, has the CAE considered including any significant deviations from the PSIAS in the governance statement and has this been evidenced?			Not applicable		
CONFORMS	PARTIAL	NOT CONFORMING			

Questions to consider	Evidence / comments			
6 Performance Standards				
6.1 2000 Managing the In	ternal Audit Activity			
The questions in this section seek to confirm that the internal audit activity's work achieves the purposes and responsibility of the activity, as set out in the internal audit charter, and that the internal audit activity adds value to the organisation and its stakeholders by:				
providing objective and	relevant assurance			
contributing to the effect management and intern				
2010 Planning				
 Has the CAE determined the priorities of the internal audit activity in a risk-based plan and are these priorities consistent with the organisation's goals? Does the risk-based plan take into account the requirement to produce an annual internal audit opinion? Does the risk-based plan incorporate or is it linked to a strategic or highlevel statement of: How the internal audit service will be delivered? How the internal audit service will be developed in accordance with the internal audit charter? How the internal audit service links to organisational objectives and priorities? 			✓ ✓ ✓	range of service areas to enable an annual internal audit opinion to be made.
CONFORMS	· · ·			Internal Audit Manual

Questions to consi	der		Evidence / comments
Does the risk-based address local and n In developing the organisation's risk r organisation? If such a risk manag judgement of risks a evidenced this?	ational issues and ri risk-based plan, h nanagement frame ement framework o	 Audit Risk Assessment reflects risk position of each area of activity. Consideration given to range of factors including previous opinion, date last audited, new and emerging risks / changes to processes / staffing etc. Audit Risk Assessment considers SSMT minutes, corporate, project and operational risk registers 	
CONFORMS	PARTIAL	NOT_CONFORMING	 Risk Management Strategy supported by discussions with all members of senior management
Does the risk-based plan set out the: Audit work to be carried out? Respective priorities of those pieces of audit work? Estimated resources needed for the work? Does the risk-based plan differentiate between audit and other types of work? Is the risk-based plan sufficiently flexible to reflect the changing risks and priorities of the organisation? CONFORMS PARTIAL			 Plan now only developed for 6 months to allow focus on new and emerging risks Audit Plan contains both assurance, consultancy and goverance reviews (approved by Governance committee) Priorities agreed with Directors and reflected in the timing of the review Resources allocated Audit Plans contain contingency time to allow
Does the CAE review the plan on a regular basis and has he or she adjustedthe plan when necessary in response to changes in the organisation'sbusiness, risks, operations, programmes, systems and controls?CONFORMSPARTIALNOT CONFORMING			 ✓ Audit Plan kept under constant review and amended when necessary. Any changes are reported to and approved by Governance
Is the internal audit activity's plan of engagements based on a documented risk assessment? Is the risk assessment used to develop the plan of engagements undertaken at least annually? CONFORMS PARTIAL NOT CONFORMING			 An Audit risk assessment is used as basis for Audit Plan. Audit Risk assessment updated throughout the year and used as basis of the development of the

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS Agenda 107 Agenda Item 9 Appendix B

Questions to consid	ler		Evidence / comments		
In developing the ris consideration to:	k-based plan, has the C/	AE also given sufficient			
Any declarations interest)?	of interest (for the avoid	 ✓ Office declaration of interests 			
The requirement procurement aud	to use specialists, eg IT o itors?	or contract and	 Procurement of ICT specialists 		
 Allowing continge investigations as 	ency time to undertake a necessary?	ad hoc reviews or fraud	✓ Contingency time		
well as regular re	I to carry out the audit p porting to and attendanche he annual report and the	 included within Audit Plan ✓ Plan allocations set out time for Audit Planning / 			
CONFORMS	PARTIAL	NOT CONFORMING	Monitoring / Reporting and time for Governance		
management and th	k-based plan, has the CA e board to obtain an unc ess objectives, associate	 ✓ Senior Managers consulted on the Audit risk assessment and comments recorded. 			
	y and consider the expen ard and other stakehold usions?	 ✓ Plan presented to SSSMT ✓ Governance committee approval of audit plan ✓ All involved with the 			
CONFORMS	PARTIAL	NOT CONFORMING	planning process		
Does the CAE take into consideration any proposed consulting engagement's potential to improve the management of risks, to add value and to improve the organisation's operations before accepting them? Are consulting engagements that have been accepted included in the risk- based plan?			 ✓ Consultancy engagements included as part of the planning process ✓ Plan includes consultancy 		
CONFORMS	PARTIAL	NOT CONFORMING	/ projects etc.		

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS 108

Questions to consider	Evidence / comments				
2020 Communication a					
Has the CAE communicate requirements to senior ma approval? Has the CAE communicate and/or resource requirem review and approval, when	 Audit Plan reported to Shared Management Team and Governance committee. Have previously reported changes and sought approval from the Governance committee 				
CONFORMS	PARTIAL	NOT CONFORMING			
Has the CAE communicat senior management and t		ource limitations to	 ✓ Any resource limitations discussed with senior 		
CONFORMS	PARTIAL	NOT CONFORMING	- managers / CGG / Governance committee.		
2030 Resource Manager	nent	·			
Does the risk-based plan explain how internal audit's resource requirements have been assessed?			 ✓ Plan allocations set out the number of days available including both internal and external 		
CONFORMS	PARTIAL	NOT CONFORMING	resources		
Has the CAE planned the deployment of resources, especially the timing of engagements, in conjunction with management to minimise disruption to the functions being audited, subject to the requirement to obtain sufficient assurance?			 ✓ Timing of engagements discussed with Directors / Service Leads and recorded on Audit risk assessment and Audit 		
CONFORMS	PARTIAL	NOT CONFORMING	Plan. Issued to SSMT		
If the CAE believes that the level of agreed resources will impact adversely on the provision of the internal audit opinion, has he or she brought these consequences to the attention of the board? This may include an imbalance between the work plan and resource availability and/or other significant matters that jeopardise the delivery of the plan or require it to be changed.			 Any concerns would be identified and discussed prior to production of and approval of the plan. 		
CONFORMS	PARTIAL	NOT CONFORMING			

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS 109

Questions to cons	ider		Evidence / comments
2040 Policies and	Procedures		
guide the internal Examples include r management syste that CONFORMS to	naintaining an audit mar ems to guide staff in perf	 ✓ Audit Manual and associated procedures ✓ Audit drive (electronic system) ✓ Document templates 	
	vorking practices and sta		-
CONFORMS	PARTIAL	NOT CONFORMING	
place reliance upon those sources? The CAE should generally share information and coordinate activities with other internal and external providers of assurance and consulting services. They may also carry out an assurance mapping exercise, or make use of assurance mapping carried out by other assurance providers. They should also meet regularly with the nominated external audit representative to consult on and coordinate their respective audit plans. Where key organisational risks relate to work undertaken through partnerships, the auditor may be able to take assurance from work undertaken by others, or by obtaining assurance directly.			 ✓ Service Assurance Statements identify other sources of assurance given ✓ Reports issued to Externa Audit
CONFORMS	PARTIAL	NOT CONFORMING	-
2060 Reporting to) Senior Management a	nd the Board	
Does the CAE report periodically to senior management and the board on the internal audit activity's purpose, authority, responsibility and performance relative to its plan? Does the periodic reporting also include significant risk exposures and control issues, including fraud risks, governance issues and other matters needed or requested by senior management and the board? Is the frequency and content of such reporting determined in discussion with senior management and the board and are they dependent on the importance of the information to be communicated and the urgency of the related actions to be taken by senior management or the board?			 Progress against the plan, findings and KPIs presented to CGG Interim reports presented to Governance committee Issues raised with managers / directors when appropriate. All other reviews reported in accordance with Governance committee timetable
CONFORMS	PARTIAL	NOT CONFORMING	-
	1	I	<u> </u>

Questions to consider	Evidence / comments		
2070 External Service Pro Internal Auditing	vider and Organisati	onal Responsibility for	
Where an external internal audit service provider acts as the internal audit activity, does that provider ensure that the organisation is aware that the responsibility for maintaining and effective internal audit activity remains with the organisation?			Not applicable
ONFORMS PARTIAL NOT CONFORMING			

CHECKLIST FOR ASSESSING CONFORMANCE WITH THE PSIAS Agenda Page 111 Agenda Item 9 Appendix B

6.2 2100 Nature of Work			
The questions in this section activity evaluates and control organisation's governance, processes using a systemat	ributes to the improvem risk management and in	ent of the ternal control	
2110 Governance			
 Does the internal audit activity assess and make appropriate recommendations to improve the organisation's governance processes for: Making strategic and operational decisions? Overseeing risk management and control? Promoting appropriate ethics and values within the organisation? Ensuring effective organisational performance management and accountability? Communicating risk and control information to appropriate areas of the organisation? Coordinating the activities of and communicating information among the board, external and internal auditors and management? 			 Overall aim of the IA Service (Audit Charter) Through specific audit reports, including the annual audit of the Governance / Risk Management Frameworks. CAE involvement in Corporate Governance Group Delivery of Governance Essentials Training to all members of SLT Ownership of corporate policies i.e. anti-fraud, whistleblowing etc Performance Management included within each engagement where appropriate Performance Management included within Internal Audit Plan as a review. Communicated through Audit reports and through provision of advice and guidance Individual Audit reports
CONFORMS	issued to Directors /External Audit ✓ Internal Audit annual report and progress reports to Governance committee		
Has the internal audit activ effectiveness of the organis and activities? This is an are sources of assurance.	ation's ethics-related ob	jectives, programmes	 Ownership of corporate policies i.e. anti-fraud, money laundering etc. Through individual audit reviews incl. Ethical culture SAS received and reviewed
CONFORMS	PARTIAL	NOT CONFORMING	as part of the AGS process
Has the internal audit activ information technology gov and objectives? This is an a sources of assurance.	 ✓ Salford Council commissioned to provide ICT assurance ✓ ICT reports considered by the CGG 		
CONFORMS	PARTIAL	NOT CONFORMING	
	1	1	1

Questions to consid	er		Evidence / comments
2120 Risk Manager	nent		
 Has the internal audit activity evaluated the effectiveness of the organisation's risk management processes by determining that: Organisational objectives support and align with the organisation's mission? Significant risks are identified and assessed? Appropriate risk responses are selected that align risks with the organisation's risk appetite? Relevant risk information is captured and communicated in a timely manner across the organisation, thus enabling the staff, management and the board to carry out their responsibilities? 			 Review of Risk management periodically included within Internal Audit Plan Use of risk management framework Use of GRACE risk management system to record risks and controls All risks assigned to an owner Corporate risk register reported and monitored
CONFORMS	PARTIAL	NOT CONFORMING	
 Has the internal audit activity evaluated the risks relating to the organisation's governance, operations and information systems regarding the: Achievement of the organisation's strategic objectives? Reliability and integrity of financial and operational information? Effectiveness and efficiency of operations and programmes? Safeguarding of assets? Compliance with laws, regulations, policies, procedures and contracts? 			 ✓ Risk-based Audit Plan ✓ Risk-based auditing for each individual audit review ✓ All areas considered as part of planning / scope of each review as appropriate. ✓ Service Assurance Statements reviewed by IA annually
CONFORMS	PARTIAL	NOT CONFORMING	
Has the internal audit activity evaluated the potential for fraud and also how the organisation itself manages fraud risk? CIPFA has issued a <i>Code of Practice on Managing the Risk of Fraud and</i> <i>Corruption,</i> and strongly recommends that it is used as the basis for assessment of how an authority manages its fraud risk.			 Individual audit engagements specifically review identified fraud risks Review to assesses the council's arrangements against CIPFA Code of Practice and Fighting Fraud and Corruption Locally completed and action plan being developed.
CONFORMS	PARTIAL	NOT CONFORMING	

Do internal auditors addr consistently with the obje	-	 ✓ IA involved with project teams to provide advice and guidance on governance, 	
Are internal auditors alert consulting engagements?		sks when undertaking	control and risk.
Do internal auditors incor engagements into their e processes?			
CONFORMS	PARTIAL	NOT CONFORMING	
Do internal auditors succ which would in effect lead when assisting managem management processes?	d to taking on manage	 ✓ GRACE system assigns risk owners to individual risks. IA do not own any risks other than those relating to the IA service 	
CONFORMS	PARTIAL	NOT CONFORMING	
2130 Control			
Has the internal audit act of controls in the organisa systems regarding the: Achievement of the or	tion's governance, ope	 ✓ Risk-based Audit Planning process ✓ Risk-based auditing for each individual audit review ✓ All areas considered as part 	
Reliability and integrit	-	of planning / scope of each	
 Effectiveness and efficiency 	review as appropriate. ✓ Risk-based Audit Plan		
Safeguarding of assets			✓ Service Assurance
Compliance with laws, contracts?	regulations, policies,	procedures and	statements reviewed by IA annually
CONFORMS	PARTIAL	NOT CONFORMING	_
Do internal auditors utilis consulting engagements processes?	-		 ✓ Where appropriate ✓ Knowledge shared within wider Audit and Risk team during fortnightly meetings
CONFORMS	PARTIAL	NOT CONFORMING	
6.3 2200 Engagement P	lanning		
Do internal auditors deve engagement?	op and document a pl	an for each	✓ Standard document
Does the engagement pla	templates / Audit Engagement Plan issued		
Objectives?	agreed and issued at the start		
Scope?		of each review.	
Timing?			
Resource allocations?			
CONFORMS	PARTIAL	NOT CONFORMING	

Questions to consid	er	Evidence / comments	
Do internal auditors engagement, and is t	consider the following in his documented:		
The objectives of	the activity being review	red?	 ✓ Audit Engagement Plan and report
-	ich the activity controls i	 ✓ Review of performance information is included within the engagement 	
The significant ris	sks to the activity being a	audited?	where appropriate ✓ Use of risk registers and
The activity's reso	ources?		recorded in the Risk and Control Evaluation ✓ Resource availability considered at the Audit
The activity's ope	erations?		Engagement Plan stage and discussed during the initial meeting.
The means by wh acceptable level?	ich the potential impact	 ✓ Part of audit planning and initial discussion with Service Lead incl. within the Engagement Plan ✓ Review of the risk register and assessment of the controls in place 	
	d effectiveness of the act control processes comp del?		
	s for making significant in nce, risk management a		 ✓ Basis of the risk based assignment. Findings included within the report
CONFORMS	PARTIAL NOT CONFORMING		 Basis of the risk based assignment. Findings and actions to improve included within the report
outside of the organi	ent plan has been drawn i isation, have the internal ng with that party about t	 Engagement plan developed and agreed with wholly owned companies prior to commencement 	
Scope?			
The respective resp	sponsibilities and other e and the outside party (ir e results of the engagem rds)?	ncluding restrictions on	
CONFORMS	PARTIAL	NOT CONFORMING	

understanding with tObjectives?Scope?	ements, have internal au he engagement clients a sponsibilities of the intern	 Engagement plan clearly set out the role of Internal Audi within consulting engagements
client and other o	lient expectations?	
documented?	iting engagements, nas	_
CONFORMS	PARTIAL	

Questions to consider			Evidence / comments
2210 Engagement Object	tives		
Have objectives been agree	✓ Within Audit Engagement Pl		
Have internal auditors carr activity under review?	ried out a preliminary risk	<assessment of="" td="" the<=""><td>and discussed at initial meeting. ✓ Review of the risk register ar</td></assessment>	and discussed at initial meeting. ✓ Review of the risk register ar
Do the engagement object assessment that has been		the preliminary risk	compilation of the RCE
Have internal auditors considered developing the engagement		the following when	 ✓ Audit engagement working papers
Significant errors?			
Fraud?			
Non-compliance?			
Any other risks?			
CONFORMS	PARTIAL	NOT CONFORMING	
Have internal auditors asce board have established add whether organisational ob If the criteria has been d used the criteria in their and controls?	 Most service areas have PIs tassess adequacy of performance and these are tested where appropriate an included within the Engagement Plan 		
If the criteria has been dee worked with management evaluation criteria? If the value for money crite organisation's main types money, people and assets	and/or the board to deve eria has been referred to, of resources been consid	 ✓ If PI's were inadequate we would identify and include within the IA report. ✓ Where appropriate 	
CONFORMS	PARTIAL	NOT CONFORMING	
Do the objectives set for co risk management and con	trol processes as agreed v	with the client?	 ✓ Included within the Audit Engagement Plan
Are the objectives set for organisation's own values,			
CONFORMS	PARTIAL	NOT CONFORMING	
Is the scope that is establis sufficient to satisfy the eng Does the scope for each en systems, records, personne consideration include areas	 ✓ Audit Engagement Plan (reviewed and agreed with C and Directors) 		
appropriate? CONFORMS	PARTIAL	NOT CONFORMING	_
CONFORMS	+ 7 \\\ + 17 \L		

Questions to consid	ler		Evidence / comments
engagement, was a s scope, respectiveres Where significant co assurance engageme	nsulting opportunities has specific written understa ponsibilities and other ex nsulting opportunities ha ent, were the results of the nicated in accordance w ?	This has not occurred as significant consultancy work is included within the IA Annual plan	
CONFORMS	PARTIAL	NOT CONFORMING	
For each consulting engagement, was the scope of the engagement generally sufficient to address any agreed-upon objectives? If the internal auditors developed any reservations about the scope of a consulting engagement while undertaking that engagement, did they discuss those reservations with the client and therefore determine whether or not to continue with the engagement? During consulting engagements, did internal auditors address the controls that are consistent with the objectives of those engagements? During consulting engagements, were internal auditors alert to any significant control issues? CONFORMS PARTIAL			 Included within Audit Engagement Plan This has not occurred but discussion would take place the situation arose Key focus of the consultancy work IA role is to ensure that governance, risk management and control issues are considered throughout the whole proje
Have internal audito of resources required based on:		 Resource allocation is estimated for each review and is included within the Annual Plan Plan is based on current knowledge of the system under review. Plan allocations issued to all auditors Time is monitored throughout the course of the audit to ensure resources are used effectively and efficiently. 	
CONFORMS	PARTIAL	NOT CONFORMING	

2240 Engagement V	Vork Programme			
Have internal auditor achieve the engagem	s developed and docume nent objectives?		RCE produced which details all the controls to be tested during the course of the	
Do the engagement w Identifying inform Analysing information		✓	review. All working papers are retained on the Shared Audit network drive.	
 Analysing information? Evaluating information? Documenting information? Were work programmes approved prior to implementation for each engagement? Were any adjustments required to work programmes approved promptly? 				Experienced / Professionally qualified auditors able to use appropriate methods to identify, analyse, evaluate and document information in order to provide assurance or otherwise in all reviews undertaken CAE / Senior Auditor approves all RCEs prior to review commencing. Auditors can amend work programme according to
CONFORMS	PARTIAL	NOT CONFORMING		complexity and time on approval by CAE

Questions to consid	ler		Evidence	e / comments
6.4 2300 Performin	g the Engagement			
	section seek to confirm aluate and document su			
relevant and useful	nformation to support e			
2310 Identifying Ir	formation			
Do internal auditors generally identify (sufficient, reliable, relevant and useful) information which supports engagement results and conclusions? Sufficient information is factual, adequate and convincing so that a prudent, informed person would reach the same conclusions as the auditor. Reliable information is the best attainable information through the use of appropriate engagement techniques. Relevant information supports engagement observations and recommendations and is consistent with the objectives for the			S ✓ E in r in c u v C a	Working papers retained on the Shared Audit network drive. Experienced auditors able to dentify sufficient, reliable, relevant and useful information n order to provide assurance o otherwise in all reviews undertaken CAE review of working papers and report would identify any shortcomings.
CONFORMS	PARTIAL	NOT CONFORMING		
2320 Analysis and	Evaluation			
Have internal auditors generally based their conclusions and engagement results on appropriate analyses and			p	Auditors follow standardized process. Each assurance rating i pased upon evidence considere
CONFORMS	PARTIAL	NOT CONFORMING	a	as part of the quality process
 Have internal auditors generally remained alert to the possibility of the following when performing their individual audits, and has this been documented: Intentional wrong doing? Errors and omissions? Poor value for money? Failure to comply with management policy? 			b c p ✓ F r c	Experienced auditors who woul be able to identify and document within working papers Review of working papers and report to ensure scope and objectives of the review acheived
Conflicts of intere	est?			
CONFORMS	PARTIAL	NOT CONFORMING	1	
2330 Documenting	Information	1		
Have internal auditors documented the relevant information required to support engagement conclusions and results? Are working papers sufficiently complete and detailed to enable another experienced internal auditor with no previous connection with the audit to ascertain what work was performed, to re- perform it if necessary and to support the conclusions reached?			r c ✓ S v v v	Working papers contain the relevant information (template documents and quality system) Senior Auditor review of working papers and report would identify any shortcoming Any shortcomings would be addressed and rectified
CONFORMS	PARTIAL	NOT CONFORMING	-	

Questions to	consider		Evidence / comments
Has the CAE o legal counsel a external partia Has the CAE d all types of er	eveloped and implement ngagement records?	 Records held on shared network drive. Only internal audit staff have access to thi drive. Retention requirements included within the Audit Manual 	
with the organ regulatory or	PARTIAL ion requirements for eng nisation's own guidelines other requirements?	 ✓ Retention schedule developed in accordance with corporate approach 	
2340 Engagement Supervision Are all engagements properly supervised to ensure that objectives are achieved, quality is assured and that staff are developed? Is appropriate evidence of supervision documented and retained for each engagement?			 Ongoing discussion with auditor, file review and report clearance will identify any issues Working papers reviewed ar signed by the Senior Auditor / CAE and comments recorded on the RCE to highlight any areas of concern which must be addressed prior to the issue
CONFORMS	PARTIAL	NOT CONFORMING	of the draft report.
The questions auditors com	nmunicating Results in this section seek to co municate the results of e In for Communicating		
 Do the communications of engagement results include the following: The engagement's objectives? The scope of the engagement? Applicable conclusions? Recommendations and action plans, if appropriate? 			 ✓ Report templates used ✓ Summary of overall finding included with controls assurance ratings ✓ Management Action Plan
CONFORMS	PARTIAL	NOT CONFORMING	
reports with the factual accura management	iditors generally discuss t he appropriate levels of r cy, seek comments and actions?	 Meeting with Lead Officer to discuss draft report, findings and agree management actions Report issued to officers set 	
CONFORMS	PARTIAL	NOT CONFORMING	out in the engagement plan

If recommendations and an action plan have been included, are recommendations prioritised according to risk?			✓	Red and amber risks reviewed and actions prioritized according to the
does the comm reached with m timescales? If there are any and managem	ent, which cannot be res	reements already vith appropriate between the internal auditor	✓ ✓	level of control Actions prioritized by priority level with the timescale recorded on the action plan Any alternative actions are recorded in the management action plan.
CONFORMS	PARTIAL	NOT CONFORMING		

Questions to consi	der		Evidence / comments
reporting, do comm them in their audit r reports or conceal u When an opinion or	nlawful practice?		 ✓ Material facts disclosed. ✓ Control assurance ratings based on findings of the review. If challenged, the auditee must provide evidence to support change ✓ All Audit reports are issued to Directors and
CONFORMS	PARTIAL	NOT CONFORMING	External Audit.
useful information (Where appropriate,	supported by sufficient, in line with responses to do engagement commu nance of the activity in qu	questions for PSIAS 2300). nications acknowledge	 ✓ Each identified risk is awarded an assurance opinion on the RCE These support the overall assurance opinion awarded for the review ✓ Positive assurance is included within the report
CONFORMS	PARTIAL	NOT CONFORMING	 ✓ Working papers reviewed to ensure accuracy of opinion
the organisation, do distribution and use	of the results?	nclude limitations on the	 ✓ Where necessary (but has not occurred)
CONFORMS	PARTIAL	NOT CONFORMING	
partnership organis companies, have th having regard to the	been required to provide ations, or arm's length b e risks of doing so been r e CAE's primary responsi for which they are engag	odies such as trading nanaged effectively, bility to the management	 ✓ CAE providing assurance to council wholly owned companies. ✓ Reports to Board of Directors and Governance Committee set out reporting requirements
CONFORMS	PARTIAL	NOT CONFORMING	
2420 Quality of Co	mmunications		
Are internal audit communications generally accurate, objective, clear, concise, constructive, complete and timely?		 ✓ Report template used ✓ Factual accuracy of report findings confirmed with auditee at draft report stage ✓ Satisfaction survey issued 	
CONFORMS	PARTIAL	NOT CONFORMING	after each review
2421 Errors and Or	nissions		
If a final communication has contained a significant error or omission, did the CAE communicate the corrected information to all parties who received the original communication?		 This would be done where required Meeting to discuss draft report may identify errors 	
CONFORMS	PARTIAL	NOT CONFORMING	and omissions if applicable

2430 Use of 'Conducted in Conformance with the International Standards for the Professional Practice of Internal Auditing'				
Do internal auditors report that engagements are 'conducted in conformance with the PSIAS' only if the results of the QAIP support such a statement?			Noted on the Report cemplate	
CONFORMS PARTIAL NOT CONFORMING				

Questions to consider				ice / comments
2431 Engagement Disclosure of Non-conformance				
Where any non-conformance with the PSIAS has impacted on a specific engagement, do the communication of the results disclose the following:		Not ap	plicable	
with which The reason	full conformance was no (s) for non-conformance?	2		
The impact engagement		the engagement and the		
CONFORMS	PARTIAL	NOT CONFORMING		
2440 Dissemi	inating Results			
Has the CAE determined the circulation of audit reports within the organisation, bearing in mind confidentiality and legislative requirements?		✓ 	Circulation specified on Audit Engagement Plan	
CONFORMS	PARTIAL	NOT CONFORMING		
Has the CAE communicated engagement results to all appropriate parties?		√	As per each individual Audit Engagement Plan	
CONFORMS	PARTIAL	NOT CONFORMING		
Before releasing engagement results to parties outside the organisation, did the CAE:		Not ap	plicable	
Assess the potential risk to the organisation?				
Consult wit appropriate	h senior management ar ?	nd/or legal counsel as		
Control dis	semination by restricting	g the use of the results?		
CONFORMS	PARTIAL	NOT CONFORMING		
Where any significant governance, risk management and control issues were identified during consulting engagements, were these communicated to senior management and the board?		√	Summary of consultancy work undertaken included within Progress Report / Annual Report	
CONFORMS	PARTIAL	NOT CONFORMING	✓	Any significant issues highlighted during the consultancy engagement are raised with the lead officer during the review

Questions to consid	ler		Evidence / comments
2450 Overall Opinio	on		
Has the CAE delivere	ed an annual internal au	dit opinion?	✓ Annual Report
Does the annual internal audit opinion conclude on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control?			 Results of individual reviews reported to senior managers and the Governance committee
Does the annual internal audit opinion take into account the expectations of senior management, the board and other stakeholders?			 throughout the year ✓ Overall annual opinion based on opinions of individual pieces of audit
	nformation (having rega	ed by sufficient, reliable, rd to the answers to	work undertaken during the year and knowledge of other sources of assurance both internal
CONFORMS	PARTIAL	NOT CONFORMING	and external.
 Does the communication identify the following: The scope of the opinion, including the time period to which the opinion relates? Any scope limitations? The consideration of all related projects including the reliance on other assurance providers? The risk or control framework or other criteria used as a basis for the overall opinion? Where a qualified or unfavourable annual internal audit opinion is given, are the reasons for that opinion stated? Has the CAE delivered an annual report that can be used by the organisation to inform its governance statement? 			 ✓ Annual Report ✓ Where appropriate ✓ Other assurance providers are included (highlighted within SAS as part of AGS work) ✓ Results of audit reviews undertaken during the year ✓ Included in summary table of each review ✓ Opinion included within AGS
 The annual intern A summary of the A disclosure of an The reasons for a A disclosure of an A disclosure of an A comparison or A statement on or The results of the Progress against A summary of the its performance or 	conformance with the PS QAIP? any improvement plans e performance of the in measures and targets? that the CAE judges is re	e opinion? opinion? opinion? ction in scope? t with the work planned?	✓ Annual report includes all required information

Questions to consid	ler		Evidence / comments	
6.6 2500 Monitorin	g Progress			
place to monitor effe	s section seek to confirm ectiveness of audit comm ling appropriate follow u			
management action	hed a process to monitor s to ensure that agreed a nted or that senior manag g action?			
where agreed actions considered revising t	risen during the follow-up s have not been impleme the internal audit opinion nitoring management ac ture audit work?	nted), has the CAE n?	 ✓ Comprehensive monitoring system introduced in 21/22. ✓ Progress against implementation of actions reported to CGG and 	
CONFORMS	PARTIAL	NOT CONFORMING	Governance Committee ✓ Implementation of actions considered as particular of the audit planning process	
Does the internal au engagements as agr	dit activity monitor the re eed with the client?	esults of consulting	 ✓ As per any other engagement 	
CONFORMS	PARTIAL	NOT CONFORMING		
6.7 2600 Communi	cating the Acceptance of	of Risks		
concluded that man unacceptable to the Situations of this kin	d are expected to be rare uirements for the CAE. It i	level of risk that may be		
If the CAE has concluded that management has accepted a level of risk that may be unacceptable to the organisation, has he or she discussed the matter with senior management?			Has not occurred but if it did, the matter would be reported to Senior Management	
to conclude that the level of risk may be unacceptable to the			This has not occurred but if it did, the matter would be reported to Governance committee	
CONFORMS	PARTIAL	NOT CONFORMING		

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Public Sector Internal Audit Standards Self-Assessment Action Plan

May 2023

Ref	Action	Responsible Officer	Status
1	Undertake a review of the Council's arrangements against the CIPFA Code of Practice on Managing the risk of fraud and corruption and Fighting Fraud and Corruption Locally	Head of Audit and Risk	In progress. The review has been undertaken an action plan is being developed. – See AGS action plan

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Report of	Meeting	Date
Head of Audit and Risk	Governance Committee	Wednesday, 24 May 2023

Internal Audit Annual Report and Opinion 2022-23

Is this report confidential?	No
Is this decision key?	No

Purpose of the Report

- 1. The purpose of this report is to summarise the work undertaken by the Internal Audit Service during 2022/2023 and to give an opinion as required by the Public Sector Internal Audit Standards (PSIAS) on the adequacy and effectiveness of the Council's framework of governance, risk management and control.
- 2. The report also includes the results of the Quality Assurance and Improvement Programme.

Recommendations

3. The Committee is asked to note the report for the year ended 31st March 2023.

Reasons for recommendations

4. The completion of an Annual Audit Report and Opinion is a requirement of the Public Sector Internal Audit Standards What reasons justify the decision?

Other options considered and rejected

5. None.

Corporate priorities

6. The report relates to the following corporate priorities: (Please bold one)

Housing where residents can live well	A green and sustainable borough
An enterprising economy with vibrant local	Healthy, safe and engaged communities

centres in urban and rural areas

Internal Audit Report

- 7. The Head of Audit and Risk is responsible for the delivery of an Annual Internal Audit Report and Opinion that can be used by the council to inform its Annual Governance Statement.
- 8. The attached report complies with the requirements of the PSIAS. It includes details of the coverage of work undertaken, a summary of the work that has been carried out that supports the opinion. It sets out any qualifications to the opinion, together with reasons for those qualifications, discloses any impairments or restrictions in scope
- 9. It also states whether the work has been undertaken in conformance with PSIAS, the results of any Quality Assurance Improvement Programme (QAIP), summary of actual performance against targets/measures and any issues that are considered relevant to the preparation of the AGS.

Climate change and air quality

10. The work noted in this report does not have an impact on the Councils Carbon emissions and the wider Climate Emergency and sustainability targets of the Council.

Equality and diversity

11. There are no equality implications contained within this report.

Risk

12. Risks are considered and outlined within the body of the report.

Comments of the Statutory Finance Officer

13. No comment.

Comments of the Monitoring Officer

14. No comment.

Background documents

There are no background papers to this report

Appendices

Appendix A – Internal Audit Annual Report and Opinion

Appendix B - Summary of work 2022-23

Appendix C – Internal Audit Performance Indicators 2022-23

Appendix D – Internal Audit Review of Water Management

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Appendix E – Internal Audit review of GDPR – Data Retention

Report Author:	Email:	Telephone:	Date:
Dawn Highton (Head of Audit and Risk)	dawn.highton@chorley.gov.uk	01772 625625	10.5.23

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Appendix A

Internal Audit Annual Report and Opinion 2022/2023

Chorley Council Date 24th May 2023 Dawn Highton – Head of Audit and Risk



WORKING TOGETHER

Introduction

1 The Public Sector Internal Audit Standards (PSIAS) note that a professional, independent and objective internal audit service is one of the key elements of good governance, as recognised throughout the UK public sector.

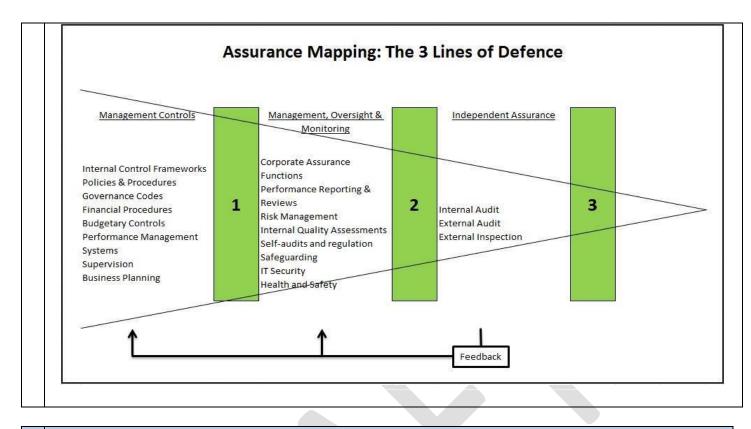
The role of the Head of Audit, in accordance with the PSIAS, is to provide an annual opinion on the overall adequacy and effectiveness of the organisation's **governance**, **risk management and control processes**.

The CIPFA Statement on the role of the Head of Internal Audit in Local Government noted that the Head of Internal Audit in a local authority plays a critical role in delivering the authority's strategic objectives by giving an objective and evidence based opinion on all aspects of governance, risk management and internal control.

The opinion is based upon the work performed and other sources of assurance, achieved through a risk-based plan of work, previously agreed with the Shared Senior Management Team and approved by the Governance Committee.

2 The Head of Audit and Risk performs the Head of Audit role for Chorley Council and Shared Services.

	The Role of Internal Audit and Management
3	The statutory basis for Internal Audit in local government is the Accounts and Audit (England) Regulations 2015. Internal Audit work is also governed by the PSIAS whose definition of internal audit is:
	"Internal Audit is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes."
4	The Council has adopted a three line of defence model in which the responsibility for implementing a strong system of governance and internal control within the Council lies primarily with the Shared Senior Management Team.
	Directors and Heads of Service provide the first line of defence as they need to ensure that they maintain effective control procedures not least because services and business systems are subject to on-going change. Compliance / support functions provide the second line of defence, with the third line being provided by Internal Audit and other inspection agencies.
	Internal Audit do not repeat the work of the second line, rather it is considered during reviews to assess the level of reliability which can be placed upon it.
5	



Basis of the opinion

6 The Head of Audit and Risk is responsible for the delivery of an annual audit opinion and report that can be used by the Council to inform its Annual Governance Statement.

In assessing the level of assurance to be given, the opinion has been given based on:

- Reviews undertaken and reports included within the Internal Audit Annual Plan;
- Advice / consultancy work undertaken by the Internal Audit team;
- The implementation of agreed management actions by Directorates;
- Internal Audit assessment of Risk Management
- Internal Audit assessment of Corporate Governance
- Other sources of assurance where appropriate;
- The quality and performance of the Internal Audit service and the extent to which it complies with the Public Sector Internal Audit Standards and ISO 9001 Quality Management System;

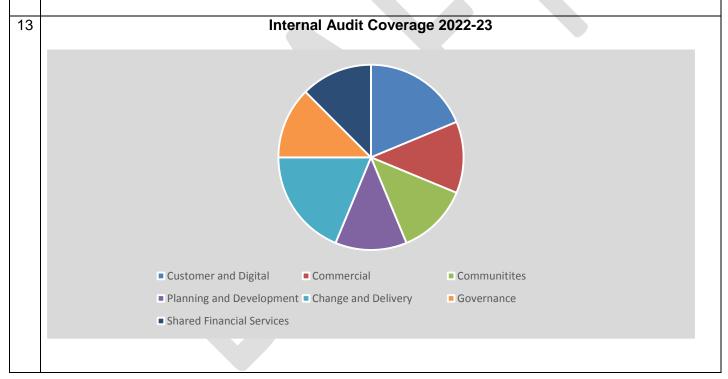
7 In giving the opinion it should be noted that an assurance opinion cannot be absolute as it is based on only those elements of governance and controls reviewed or taken into account as a result of any of the above activity.

	Scope and Objectives of Internal Audit
8	The scope and objectives of Internal Audit are set out in the Internal Audit Charter which was last approved by the Governance Committee in March 2022.
9	The Internal Audit Charter also sets out any impairments or restriction in scope for Internal Audit as:
	"The Head of Audit and Risk is also operationally responsible for Insurance, Business Continuity, Emergency Planning and Health and Safety functions and for the administration and development of, and reporting on, the Risk Management Strategy. It is considered prudent that any internal audit engagement covering the above operational areas and the risk management framework, especially for the formation of the annual opinion on the effectiveness of the control environment, would be overseen

	by the Council's Monitoring Officer".
10	A review of the risk management arrangements was undertaken during 2021-22, however due to the operational responsibility detailed above, this was carried out by an independent third party.
11	I can confirm that the Internal Audit Service is independent as no reviews have been undertaken during 22/23 which impact upon the independence of either the Internal Audit Service or the Head of Audit and Risk.
	Audit Coverage for 2022/23
12	Over the past few years, it has become apparent that the audit plan needs to be dynamic and responsive to change. In previous years, an annual plan has been developed and approved, however,

transformation programme and risks would add more value to the organisation. It was, therefore agreed with both the Senior Management Team and the Governance Committee that for 2022/23, the Audit Plan would be developed bi-annually for 6-month periods.

In order to provide an opinion, coverage of the whole authority should be obtained. The two combined Plans contained a total of planned 16 audit reviews as detailed below. In addition, a further unplanned review was undertaken.



	Work completed to support the opinion
14	The opinion is based primarily on the work carried out by the Council's Internal Audit service during 2022/23, as well as a number of other assurance providers. As the Head of Audit and Risk, I am satisfied that sufficient assurance work has been carried out to provide an annual opinion on the overall adequacy and effectiveness of the organisation's governance, risk management and control processes.
15	Planned Audit Work

Full	the Authority can place complete reliance on the controls. No control
	weaknesses exist.
Substantial	the Authority can place sufficient reliance on the controls. Only minor control weaknesses exist.
Adequate	the Authority can place only partial reliance on the controls. Some control issues need to be resolved.
Limited	the Authority cannot place sufficient reliance on the controls. Substantive control weaknesses exist
table below:	ompleted during 2022-2023 and the assurance rating awarded is included in the
Full	Community Infrastructure Levy
Substantial	 Food Safety Code of Conduct VAT
Adequate	 Review of Licensing Strawberry Fields Safeguarding Absence Management Key Strategic Partnership Payroll External Funding
Limited	 Water Management Utilities Management General Data Protection Regulations – Data Deletion
and work is on-goi	ghts, during 2022/23, Internal Audit identified several areas of control weakness ng to strengthen the Council's control environment in relation to the weaknesses ncluded (but not limited to):
Utilities Managen	nent (Commercial Directorate)
This review identif	ied that there is a lack of overarching management of utilities, including:
 Inadequa Lack of p Non-com are met r 	assign responsibility for the administration and management of utilities: te arrangements in place to validate supplier invoices; olicies and procedures to provide guidance and direction for officers. pliance with regulations to ensure that the Council's responsibilities as a landlo egarding gas and electrical safety checks. records are inadequate and does not allow for the effective management

18	Water Management (Customer and Digital Directorate)
	Our review identified that the Council's procedures for water management and safety at Council- owned open water sites (reservoir, lodges, ponds etc.) was formalised in 2016 with a Water Safety Policy, however it is evident that the procedures are not operating as outlined and there is a general lack of awareness and access to the policy for the officers/teams maintaining water sites across the borough.
	Actions were agreed to:
	 Review and update the policy; Re-visit site risk assessments; Ensure all bodies of water is inspected in accordance with the arrangements set out in the policy; Ensure all health and safety risk assessments are up to date and reflect operational activity.
	A full copy of this report is included at Appendix D
19	GDPR – Data Retention (Corporate)
	This review confirmed the need for the Council to:
	 Implement a rigorous process for review of polices to ensure they remain accurate and reflective of operational activity; Align ROPAs, data retention schedules and Privacy notices to ensure a consistent approach is adopted and clear and accurate information is provided to the public; Ensure the ROPA is up to date and regularly reviewed; Each Directorate to ensure data held meets the agreed data retention schedules.
	A full copy of this report is included at Appendix E
20	Commercial Directorate Procurement (Unplanned review) In addition to the planned reviews, Internal Audit also issued a report highlighting that there had been clear breaches of the governance framework resulting in a significant reputational risk and failure to adequately protect the Councils confidential data within the Commercial Directorate. Since this review was finalised, a multi-disciplinary Commercial Directorate Development Group has been established. The aim of the group is on developing and embedding a strong governance framework and a positive, supportive culture focused on high quality service delivery.
21	The remaining reviews all received either an adequate or substantial assurance rating. Senior Management have accepted all the findings of the reviews and management actions have been agreed to further improve the overall control environment.
22	 In addition to the work carried out above, Internal Audit have also issued the following reports / provided assurance which do not include a formal assurance rating: Annual Governance Statement review to identify themes for inclusion in the AGS action plan; COVID grant assurance returns for the Department for Business Energy and Industrial
	 Strategy (BEIS); National Fraud Initiative review of matches and co-ordination of the 2022 exercise.
23	The Internal Audit Team and the Head of Service Audit and Risk have also participated in a number of corporate groups and initiatives throughout the year in order to provide support and advice on a variety of risk and control issues. These include:

	Membership of the Senior Leadership	o Team;				
	Member of the officer Corporate Gove	•				
	Commercial Directorate major project	•	quired);			
	Commercial Directorate Development	• •				
	Change and Delivery Grant developm	nent.				
	Internal Audit also disseminate fraud alert National Anti-Fraud Network (NAFN).	s to relevant offic	ers and	manage a	ccessibili	ty to t
	Full details of all the work undertaken is inclusive 2022-2023.	luded at Appendi >	k B – Su	mmary of Ir	nternal Au	udit Wo
24	The Internal Audit Plan also contained two	reviews which ar	e not ye	t finalised.	The Vu	Inerabil
	Management review will only commence in June 2023 and the ICT Support review is currently in progress. Both of these reviews were delayed as a result of the ICT Auditors non availability.					
25	The table below provides a breakdown of as	surance opinions is	ssued by	Internal Au	idit over t	he pas
	years for planned reviews. Due to COVID a					
	two years in which meaningful comparable					
	position to measure over a longer period of the					
00	position to measure over a longer period of the allocated to Internal Audit in 21/22.	ime. It should also	be noted	d that additi	onal reso	ource w
26	position to measure over a longer period of the allocated to Internal Audit in 21/22. The table demonstrates a broadly consister	ime. It should also	be noted	d that additi	onal reso	ource w
26	position to measure over a longer period of the allocated to Internal Audit in 21/22.	ime. It should also	be noted	d that additi	onal reso	ource w
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26	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as:	ime. It should also ent picture across	be noted	d that additi	onal reso	ource w
26	position to measure over a longer period of the allocated to Internal Audit in 21/22. The table demonstrates a broadly consisted assurance levels awarded at each level as:	ime. It should also ent picture across udit Assurance Le	the two	d that additi	onal reso similar n	ource w
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26	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate Limited	ime. It should also ent picture across udit Assurance Le 2021/22 0 7	the two evels	d that additi years with 2022/23 1 3	onal reso similar n <u>%age</u> 8% 21%	ource w
26	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate	ime. It should also ent picture across udit Assurance Le 2021/22 0 7 7 7	be noted the two evels %age 0% 43% 44%	d that additi years with 2022/23 1 3 7	onal reso similar n <mark>%age</mark> 8% 21% 50%	ource w
26	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate Limited	ime. It should also ent picture across udit Assurance Le 2021/22 0 7 7 2	be noted the two evels %age 0% 43% 44%	d that additi years with 2022/23 1 3 7 3	onal reso similar n <mark>%age</mark> 8% 21% 50%	ource w
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	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate Limited Totals	ime. It should also ont picture across udit Assurance Le 2021/22 0 7 7 2 16 nagement Actio	be noted the two evels 0% 43% 44% 13%	d that additi years with 2022/23 1 3 7 3 14	onal reso similar n %age 8% 21% 50% 21%	umber
26	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate Limited Totals Follow up of Internal Audit Agreed Ma A rigorous monitoring system is in place to e	ime. It should also ont picture across udit Assurance Le 2021/22 0 7 7 7 2 16 nagement Actio ensure all agreed i	be noted the two the two vels 0% 43% 44% 13% 13%	d that additi years with 2022/23 1 3 7 3 14	onal reso similar n %age 8% 21% 50% 21% s are imp	
	position to measure over a longer period of ti allocated to Internal Audit in 21/22. The table demonstrates a broadly consiste assurance levels awarded at each level as: Internal Au Assurance Level Full Substantial Adequate Limited Totals	ime. It should also ent picture across udit Assurance Le 2021/22 0 7 7 7 2 16 nagement Actio ensure all agreed n anagement system	the two the two evels %age 0% 43% 44% 13% 13%	d that additi years with 2022/23 1 3 7 3 14 nent actions 5. This allo	onal reso similar n %age 8% 21% 50% 21% 50% 21%	umber

The table below sets out the number of agreed internal audit actions and their current status:

	Actions due by 31.3.23	Actions implemented	%age
CBC	124	78	63%
Shared Services	57	46	80%

Whilst the target implementation rate of 90% has not been met, the outstanding actions have been reviewed and it has been established that the reasons are largely related to Commercial Directorate.

There were a number of key appointments within the organisation in recent months and Internal Audit are working closely with each new Head of Service to ensure that audit actions are reallocated

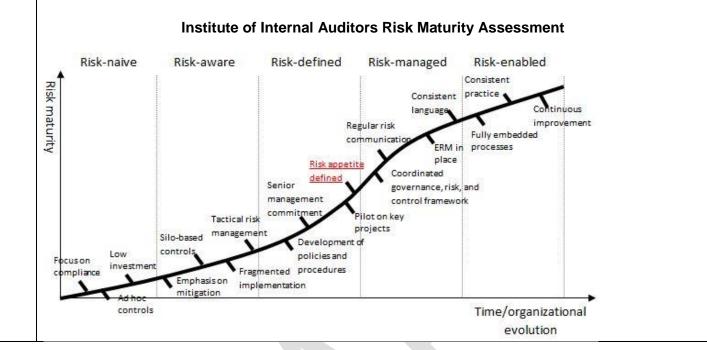
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to the appropriate responsible officer, the context of the audit report and actions arising are clearly understood and achievable realistic timescales for delivery are agreed.

	Risk Management
28	Risk Management is the process by which risks are identified and evaluated so that appropriate mitigation can be applied to reduce the likelihood and impact of risks materialising. In the event a risk materialises, this could inhibit the Council to achieve its objectives and fulfil its strategic priorities.
29	As reported in 2022, the Council has taken steps to embed risk management processes, and the current arrangements include:
	 Risk Management Strategy approved in 2021; Use of a dedicated risk management system; Individual officer training delivered as and when required; Risk Management training to all members of Senior Leadership Team;
	 Dedicated risk management training for members;
	 Mandatory risk management training for all members of staff through the corporate Learning Hub;
	 Review of the Corporate Risk Register by the Senior Management Team and Governance Committee;
	 Development of risk registers to capture risks and mitigations for a range of activities, including corporate strategy projects, business planning, partnerships and operational risks; Consideration of risk in all committee / Council reports;
	 Risk management as a standing item on Directorate monthly meetings;
	 Development of reports for the Officer Corporate Governance Group and Directors.
30	The Internal Audit opinion on the effectiveness of the Council's Risk Management arrangements is based on the Chartered Institute of Internal Auditors' Risk Maturity Model. This review has concluded that the approach to risk management at a strategic level is effective, however there is still further work required within operational activity with some Services' understanding of risk identification and management requires improvement. The Audit and Risk Service will continue to offer staff and services risk management training in the future.

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31 The table below shows that the Council's risk management maturity is largely risk defined. In order to become risk managed, the Council needs to ensure work is undertaken to define its risk appetite, monitoring and reporting arrangements and embed risk management within all operational service areas.



Corporate Governance

32 The opinion of Internal Audit on the effectiveness of the Council's coporate goveranance arrangements is based on CIPFA's Delivering Good Governance in Local Government Framework 2016.

In order to support the compilation of the Annual Goverance Statement Action Plan, a full review of the six principles contained within the guidance was undertaken. Actions arising from this review were presented and agreed with the Corporate Governance Group and are detailed in the Annual Governance Statement report.

33

Internal Audit Corporate Governance Assessment

CIPFA Principle	Internal Audit Assessment
A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law	Adequate – whilst the Council is largely compliant with the requirements set out, the AGS contains an action to update the Council's Constitution.
B. Ensuring openness and comprehensive stakeholder engagement.	Substantial – no key issues identified
C. Defining outcomes in terms of sustainable economic, social, and environmental benefits	Substantial – no key issues identified
D. Determining the interventions necessary to optimise the achievement of the intended outcomes	Substantial – no key issues identified
E. Developing the entity's capacity, including	Adequate - it has been recognized that there

the capability of its leadership and the individuals within it	are some development needs for the Senior Leadership Team.
F. Managing risks and performance through robust internal control and strong public financial management	Adequate – whilst there are some robut processes in place, evidence confirms that the are a number of processess whe improvements are required.
G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability	Substantial – no key issues identified

	Other Sources of Assurance		
34	Internal Audit has continued to consider other forms of assurance received by the Council. When preparing the audit plan and when undertaking individual reviews, we consider other sources of information available to us and assess them for the level of reliance which can be placed on them. Details of other sources of assurance are provided below:		
35	Health and Safety		
	Health and Safety recently became a shared service and now has a stable team in place to support and advise the Council. Initially the team has prioritized ensuring training on first aid, fire wardens and manual handling is delivered to all relevant employees. In addition, the focus has been on the development of a shared Health and Safety framework to provide support and guidance for managers across both authorities. More recently, resource has been specifically targeted towards higher risk areas to ensure arrangements are robust and compliant with best practice.		
36	Insurance		
	The Insurance Service have recently implemented a new automated claims management system. This is now allowing the Service to identify claim trends and report on the differing type of claims and costs and improve our overall management of risk in relation to insurance claims. Reports are currently being developed for reporting to the Corporate Governance Group on a six monthly basis.		
37	Other assurance providers		
	In formulating the overall opinion, other sources of assurance can be taken into account based on their findings and conclusions.		
	Examples of other assurance provides can include (not an exhaustive list):		
	 Work undertaken by External Audit including Housing Benefit Subsidy Claim; The work of specifically commissioned consultants; Section 11 Safeguarding review. 		
	These assurances are also considered when developing the Internal Audit Plan.		
38	Chorley Leisure Limited ~Annual opinion		
	The Internal Audit Service has also completed a range of reviews for Council's wholly owned company – Chorley Leisure Limited. The assurance ratings and reviews have been formally reported to the Board of Directors. In addition, in consultation with the Board of Directors, Internal Audit have completed the checklist contained within the Local Partnership - Local Authority Company Review Guidance. South Ribble Leisure also have full access to the dedicated risk management system and		

are in the process of developing a full suite of risk registers.

Whilst the formation of the wholly owned company is still relatively recent, evidence has confirmed that there is still work to do to fully embrace the Council's governance framework so that it becomes fully embedded.

Based on the above, it is the view of the Head of Audit and Risk that the overall adequacy and effectiveness of the arrangements within Chorley Leisure is adequate.

	Annual Opinion
39	Based on the work undertaken and evidence available to Internal Audit including other sources of
	assurance, it is considered that the overall adequacy and effectiveness of the Council's governance,
	risk management and control processes are adequate for the financial year ended 31 st March 2023
	except for the significant control weaknesses identified at paragraphs 17 to 20.
	Public Sector Internal Audit Standards (PSIAS)
40	In accordance with the PSIAS, the Chief Internal Auditor (Service Lead Audit and Risk) has established a quality assurance and improvement programme (QAIP) that covers all aspects of the internal audit activity. The QAIP must include both internal and external assessments. This is included as a separate item on this agenda.
41	The internal assessments include the following:
	 An annual self-assessment of the effectiveness of the Internal Audit Service audit service using the PSIAS and Local Government Application Note. From this assessment an action plan highlighting areas for improvements will be developed.
	• Day-to-day monitoring of compliance with the procedures and audit methodology that conform to the PSIAS, which will be regularly reviewed. All documentation used throughout the whole Internal Audit process is required to comply with the standards and this is recorded on final reports.
42	An external assessment must be undertaken once every 5 years. This was last undertaken in April 2018 and reported to the Governance Committee in May 2018. The assessment provides an external validation of the self-assessment with next assessment planned for June 2023.
43	The internal annual self-assessment has now been conducted and the results are included as a separate report on the agenda. This review confirmed that the Service largely conforms to the professional standards. Only one area for improvement has been identified. This was identified during the 2022 review however reasons beyond our control prevented this from being successfully progressed.
	Members will recall that the Internal Audit Service also successfully achieved the ISO9001 Quality Management System this year. This clearly demonstrates the commitment to improvement and ensuring that a high quality service is provided to both Councils.

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The table at Appendix C summarises the key performance data for the Internal Audit Service during 44 2022-2023 and demonstrates that the majority of performance indicators have either been achieved or exceeded. There is only the one indicator, % of agreed actions implemented by management, which is below target with the explanation provided above.

	Looking forward
45	It is accepted that the past 12 months have been turbulent for the Commercial Directorate and a range of issues contained within the body of this report have been identified. It must also be acknowledged that the Internal Audit Service have identified good practice throughout the organisation.
46	The Council now has a new Chief Executive and a number of new Heads of Service which should bring further stability to the organisation.
47	Internal Audit would like to take this opportunity to formally thank all staff throughout the Council with whom the Service has had contact with. In what has been a difficult year, the Senior Management Team have responded positively to our findings and supported the Internal Audit Service.

Appendix A	۱
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Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

CORPORATE		
Annual Governance Statement	Not applicable	The review comprised of detailed testing and analysis of the Local Code of Corporate Governance and Service Assurance Statements completed by Directors. Common themes of improvements are included within the Annual Governance Statement Action Plan 2023
Anti-Fraud & Corruption	Not applicable	A review of the Council's probity policies was undertaken. All policies are available to officers on the intranet and the Council website.
		Throughout the year, fraud alerts received from various sources are circulated so that officers / the public are made aware of new threats and risks.
National Fraud Initiative (NFI)	Not applicable	Data for the main NFI 2022/23 was submitted for trade creditors, housing waiting list, Council Tax Reduction Scheme, taxi drivers and payroll. Results have been received and the investigatory work ha commenced.
		Internal Audit are currently working with data holders to meet the Cabinet Office data requirements for the forthcomin Council Tax SPD 2023 exercise.
COVID Grant Assurance	Not applicable	Internal Audit participated in the BEIS post payment assurance verification process; providing the required evidence support the payments made are compliant with the grant eligibility criteria.
		Following on from evidence provided to support COVID-19 Business Grants schemes – (Cohort 1), confirmation has been received from the Department for Business, Energy and Industrial Strategy (BEIS), that CBC followed an appropriate and robust process in completing the assurance checks when awarding and paying a grant.
		In addition, assurance was provided in relation to the Containing Outbreak Management Fund and Test and Trace Support Payment grant determination sign off.

Appendix A	
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Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

Customer Services		
Revenue and Benefits Project Support	Not applicable	Following the implementation of a Shared Service within Revenues and Benefits, Internal Audit play an active role in the project team reviewing and aligning processes to ensure they are both robust and resilient.
ICT		
Vulnerabilities Management	To be confirmed	This review is due to commence June 2023.
ICT Support	To be confirmed	This review is currently in progress and will be reported to the Committee in the first progress report of 23/24.
Project Support	Not applicable	Proactive support was provided to assist with Digital Strategy project
Streetscene & Waste		
Water management	Limited	Our review identified that the Council's procedures for water management and safety at Council-owned open water sites (reservoir, lodges, ponds etc.) was formalised in 2016 with a Water Safety Policy, however it is evident that the procedures are not operating as outlined and there is a general lack of awareness and access to the policy for the officers/teams maintaining water sites across the borough.
		Actions were agreed to:
		 Review and update the policy; Re-visit site risk assessments; Ensure all bodies of water is inspected in accordance with the arrangements set out in the policy;
		Ensure all health and safety risk assessments are up to date and reflect operational activity.

Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

PLANNING AND DEVELOPMENT			
Community Infrastructure Levy	Full	No key control issues were identified	
Licensing	Adequate	Our work identified that licensing policies are in place, subject to regular review and are readily available to the public via the Council's website. The service has a good set of documented procedures spanning all licence types to support officers with administrative processes and aid compliance with the requirements of the respective policies and legislative requirements. The introduction of regular supervisory checks would strengthen the current arrangements and ensure quality is maintained by reducing the risk of error or omission. Actions were agreed to strengthen proactive premises inspections and to undertake a full of council-set licence fees to ensure that the rates set are appropriate and cover the cost of the ongoing administration. There is also a requirement for the service to revisit their lone working arrangements to ensure that it is robust and accurately reflects the needs of the service.	
COMMERCIAL			
Utilities Management	Limited	 This review identified that there is a lack of overarching management of utilities, including: Failure to assign responsibility for the administration and management of utilities: Inadequate arrangements in place to validate supplier invoices; Lack of policies and procedures to provide guidance and direction for officers. Non-compliance with regulations to ensure that the Council's responsibilities as a landlord are met regarding gas and electrical safety checks. Property records are inadequate and does not allow for the effective management of utilities; Failure to undertake a procurement exercise of water supplies since the deregulation of commercial water supplies. 	
Strawberry Fields	Adequate	In the three years that Strawberry Fields Business Centre has been open, the Digital Office Park Manager (DOPM) has put in place suitable processes and developed a trained flexible team to undertake the day to day operations of the Business Centre. The Business Centre's 37 offices are currently fully occupied under lease or licence, and a waiting list of potential future clients is actively being managed. Good billing arrangements are in place with invoices raised in a timely manner and debt recovery processes are actively applied in accordance with the Councils procedures. Testing of the safety inspections and maintenance work for Strawberry Fields highlighted that	

Appendix A

Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

		supporting records were available to demonstrate compliance with statutory requirements, however further work is required to ensure that the Planned Programme of Maintenance Spreadsheet (PPM) is updated correctly and in a timely manner. The current arrangements could be further strengthened by improving the monitoring of leases and licences, develop documented procedure notes to support day to day operational arrangements and formalise business continuity arrangements for the onsite team and ensure that our obligations to our tenants are met in the event of unplanned incident.
Project Support	Not applicable	Project support was provided to further develop the project risk register and review risk management practices within the project.
		A meeting was held with the Strategic Development Officer and the Strategic Lead for Future Investments to identify areas for further consideration and improvement to the project risk register. A risk workshop was attended with project team members to ensure that risks across all areas of expertise were captured for evaluation and monitoring.
Commercial Services Directorate Procurement Review	Limited	Internal Audit issued a report highlighting that there had been clear breaches of the governance framework resulting in a significant reputational risk and failure to adequately protect the Councils confidential data.
		Since this review was finalised, a multi-disciplinary Commercial Directorate Development Group has been established. The focus of the group is on developing and embedding a strong governance framework and a positive, supportive culture focused on high quality service delivery.
COMMUNITIES		
Safeguarding	Adequate	Safeguarding policies and procedures are regularly reviewed and accessible for officers and elected members, and testing indicated that office-based staff have a good awareness of both policies and the process to report a safeguarding concern. Actions were agreed to:
		 launch the Volunteer Policy to reinforce the Council's safeguarding requirements for volunteers; Review the Corporate Safeguarding Steering Group membership to ensure it is representative of the whole Council and attendance levels are sufficient to maintain focus and drive change; Review job descriptions to meet the requirements of the Recruitment Selection and On-Boarding Policy and

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Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

Substantial	clearly outline the requirement for an Enhanced Disclosure for the post.
Substantial	No key control issues were identified.
Adequate	Our work has established that a comprehensive Policy has been adopted and that there is a reasonable level of awareness and application.
	Current arrangements could be strengthened in record keeping and ensuring there is full compliance in all service areas.
Adequate	The Council has developed a comprehensive Key Contracts and Partnerships Framework (Framework) to help ensure that key partnerships have good systems of governance, well developed risk management practices and robust monitoring arrangements. The Frameworks are accessible to officers via the intranets to provide guidance and direction on the additional principles and requirements of a key contract/partnership. Robust reporting arrangements are also in place with key responsible officers provide progress updates to the Transformation and Change Team for biannual reporting to SMT and annually to Cabinet.
	There are improvements to be made to further strengthen the current arrangements and these include:
	 Review of the Framework to ensure it continues to meet the needs of the organisation; Monitoring and reporting of specific governance aspects of key partnerships to be introduced to further embed the requirements of the Framework.
Adequate	During 2022, a significant amount of work was undertaken to move to a new payroll provider. Our review confirmed that this project was successfully delivered with the majority of employees moving seamlessly to the new provider.
	Our work did identify some further improvements to be made to ensure the arrangements are fully embedded and roles and responsibilities are clear.
Not applicable	Internal Audit provided advice/guidance relating to setting up a new process for administering business grant schemes.
	Adequate

Appendix A

Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

GOVERNANCE		
Code of Conduct	Substantial	No key control issues were identified for this review.
 operational activity; Align ROPAs, data retention schedules and Privacy notices to ensure a consistent approac clear and accurate information is provided to the public; Ensure the ROPA is up to date and regularly reviewed; Each Directorate to ensure data held meets the agreed data retention schedules. 		 Implement a rigorous process for review of polices to ensure they remain accurate and reflective of operational activity; Align ROPAs, data retention schedules and Privacy notices to ensure a consistent approach is adopted and clear and accurate information is provided to the public; Ensure the ROPA is up to date and regularly reviewed; Each Directorate to ensure data held meets the agreed data retention schedules.
SHARED FINANCIAL SERV	ICES	
Review of VAT	Substantial	Our work has established that the Council has a good level of arrangements and that established controls are operating effectively.
External Funding	Adequate	Testing identified confirmed that funding conditions are predominantly adhered to; the application process had been clearly designated to a responsible officer and there is alignment with the appropriate organisation's Corporate Strategy/statutory obligation. However it was identified that the Council would benefit from the introduction of an External Funding Strategy to augment the requirements set out in the Councils' Financial Procedure Rules would support managers, formalise procedures, set the standard for record keeping, and assist in providing assurance to the Director of Finance that robust monitoring arrangements are in place for all grant awards received

Internal Audit Plan 2022-23	Assurance	Commentary
	Rating	

Appendix A

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INTERNAL AUDIT PERFORMANCE INDICATORS 22-23

	Indicator	Audit Plan	Target 2022/23	Actual 2022/23	Comments	
1	% of planned time used	CBC	90%	127%	Above Target	
2	% audit plan completed	CBC	90%	87.5%	Slightly below target	
3	3 % satisfaction rating (assignment level)		90%	96%	Above Target	
	% of agreed actions implemented by	CBC	90%	63%		
4	management	SS	90%	81%	See body of the report	

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Chorley Council

Final Internal Audit Report

Water Management 2022/2023

Audit Assurance: Limited Auditor: David Holgate/Jacqui Murray Date Issued: 11th May 2023





WORKING TOGETHER

Reason for the Audit & Scope

Chorley Council has management responsibility for a significant number of open water bodies. Many of 1 the Council's water bodies are open to the general public, therefore the Council has a legal responsibility to ensure the water bodies and their immediate surroundings are safe for all visitors and officers working nearby. Water management refers to the inspection, monitoring and ongoing management of these Council-owned water sites.

The review is included in the 2022/23 Annual Audit Plan approved by the Governance Committee on the 23rd November 2022.

Audit Objectives

- 2 The overall objective of the audit was to provide an opinion of the adequacy, application and reliability of the key internal controls put in place by management to ensure that the risks are being sufficiently managed.
- 3 The audit also assessed the effectiveness of the various other sources of assurances using the three lines of defence methodology.
- The audit will focus on specific risks where the controls in place mitigate a gross red / amber risks to a 4 residual green risk. In addition, all fraud risks and performance management data will be included within our work.

Audit Assurance

- 5 Water Management at Chorley Borough Council has not been reviewed previously by Internal Audit.
- The Head of Internal Audit is required to provide the Governance Committee with an annual audit 6 opinion on the effectiveness of the overall control environment operating within the Council and to facilitate this each individual audit is awarded a controls assurance rating. This is based upon the work undertaken during the review and considers the reliance we can place on the other sources of assurance.
- 7 Appendix A shows the risks that have been tested for Water Management and the assurance opinion awarded to each. Our evaluation of the reliance we can place on the three lines of defence is also shown.
- 8 Our review identified that the Council's procedures for water management and safety at Council-owned open water sites (reservoir, lodges, ponds etc.) was formalised in 2016 with a Water Safety Policy, however it is evident that the procedures are not operating as outlined and there is a general lack of awareness and access to the policy for the officers/teams maintaining water sites across the borough. Testing of the key requirements set out within the Water Safety Policy highlighted the following weaknesses:
 - The policy has not been reviewed and updated since its implementation and therefore does not reflect key changes that have occurred within the service such as the introduction of the Alloy Asset Management System to record inspections and reporting defects.
 - Although it is recognised that Alloy has significantly improved agile working and automated the • inspection and maintenance regime and that the parameters in relation to the frequency of inspection are aligned, the methodology for defect reporting and the process for inspection does not meet the requirements of the policy.
 - Site risk assessments that inform the nature and frequency of inspection for each site have not been revisited since policy implementation.
 - The majority of identified water sites are plotted on the Alloy system and whilst all of the bodies of water classified as high risk within the Water Safety Policy are being routinely inspected, it was identified that 53% of the remaining sites are not routinely inspected and monitored with no

historical evidence available to support that these have ever been carried out. The Council has a duty of care under The Occupiers Liability Act to ensure the safety of visitors on council owned land and due to a lack of comprehensive, documented inspections across all sites the Council may struggle to demonstrate that we are meeting the obligations in this respect.

• There is an absence of supervisory checks to ensure that inspections are carried out at the correct frequency and/or standards of inspections are maintained across all sites.

To reduce the likelihood of harm to employees and to ensure that the Council meets its obligations under the Health & Safety at Work Act 1974, it needs to ensure that any Health and Safety risks have been identified and suitable safe systems of work have been adopted.

Whilst a generic working near water risk assessment is in place, further work is required as the risks and controls are not site specific and are not reflective of the individual conditions and the full range of hazardous activities undertaken for each body of water. Furthermore, there were no safe systems of work available specifically compiled for tasks/jobs that are conducted around water sites.

Although it can be seen that a level of inspection and ongoing monitoring is apparent, due to the fact that only a proportion of identified sites are being proactively inspected, procedures have deviated from the approved policy and the significance of the Health and Safety risks highlighted a **Limited** assurance rating has been awarded for this review. The action plan at Appendix B provides further details of the findings and risks identified.

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Risk and Controls	Control Evaluation
Risk 1 – Relevant policies and procedures are not communicated	
effectively to employees, leading to confusion as to roles and	
responsibilities	
Policy/Strategy is in place and approved	Working as intended
Flood Risk Management is adequately managed	Working as intended
Policy/Strategy is up to date, owned and reviewed regularly	Action 1
Policy/Strategy is suitable/fit for purpose (Legislation)	Action 1
Policy/Strategy is accessible/staff awareness of policy	Action 1
Procedure/working practices are in place	Action 1, 9 & 13
Risk 2 – Legal and statutory requirements may not be being met due to	
ineffective management of water sites.	
Policy/Strategy is suitable/fit for purpose (Legislation)	Action 1
All open water sites have been identified	Action 2
Inspection programme in place	Action 3, 4 & 5
Comprehensive records are maintained	Action 6
Supervisory checks undertaken by team leaders	Action 7
Health & Safety (employees)	Action 8
Signage requirements have been considered for each site	Action 10
Rescue equipment requirements have been considered for each site	Action 10
Recreational club use managed and licensed	Action 13
Risk 3 – A failure to recognise all existing water site assets meaning that	
some may fall into disrepair or become dangerous	
Procedure/working practices are in place	Action 1, 9 & 13
All open water sites have been identified	Action 2
New sites are identified as per the policy process	Action 2
Inventories are in place to manage assets at each site	Action 3
Inspection programme in place	Action 3, 4 & 5
Risk 4 – A lack of maintenance of water areas to prevent them from	
becoming hazardous	
Procedure/working practices are in place	Action 1, 9 & 13
Responsibilities are clearly defined	Action 1
Inspection programme in place	Action 3, 4 & 5
Regular maintenance and reactive maintenance are undertaken	Action 6
Comprehensive records are maintained	Action 6
Supervisory checks undertaken by team leaders	Action 7
Risk 5 - Potential lack of adequate staff training for appropriate roles	
covering water areas	
Supervisory checks undertaken by team leaders	Action 7
Suitable site-specific training requirements identified	Action 11
Sultable site-specific training requirements identified	Action 11
Training matrix helps identify any gaps	Action 12
Training matrix helps identify any gaps Officers are First Aid trained	Action 12
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal	Action 12
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met	Action 12 Working as intended
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place	
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team	Working as intended
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements	Working as intended Action 1
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded,	Working as intended Action 1
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded, investigated, monitored and resolved in a timely manner	Working as intended Action 1
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded, investigated, monitored and resolved in a timely manner Corporate complaints procedure in place	Working as intended Action 1 Action 1 Working as intended
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded, investigated, monitored and resolved in a timely manner Corporate complaints procedure in place Service specific complaints are handled in a timely manner	Working as intended Action 1 Action 1 Working as intended Working as intended
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded, investigated, monitored and resolved in a timely manner	Working as intended Action 1 Action 1 Working as intended
Training matrix helps identify any gaps Officers are First Aid trained Risk 6 - Inadequate insurance cover meaning that the Council's legal obligations cannot be met Insurance policy in place Site changes are communicated to the Insurance Team Awareness of risk management requirements Risk 7 - Complaints received about water sites are not being recorded, investigated, monitored and resolved in a timely manner Corporate complaints procedure in place Service specific complaints are handled in a timely manner Complaint records are available	Working as intended Action 1 Action 1 Working as intended Working as intended

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Inventories are in place to manage assets at each site	Action 3
Health & Safety (employees)	Action 8
Safe Systems of Work are operational	Action 8
Lone Working arrangements are in place	Action 9
Signage requirements have been considered for each site	Action 10
Rescue equipment requirements have been considered for each site	Action 10
Officers are First Aid trained	Action 12
Water Safety promoted through educational campaigns	Action 14
Open Water specific risk register in place	Action 15

Appendix A

AUDIT ASSURANCE

Three Lines of Defence

Audit Area	1 st Line	2 nd Line	3 rd Line	Internal Audit opinion
Water Management	Team Leader	Senior Management	Audit	Reliance cannot be placed on the first line of defence as there is a lack of supervision to ensure risk management practices are being completed.

Risk and Control Evaluation

Risks Examined	Full	Substantial	Adequate	Limited
Risk 1 – Relevant policies and procedures are not				
communicated effectively to employees, leading to				\checkmark
confusion as to roles and responsibilities				
Risk 2 – Legal and statutory requirements may not be being				\checkmark
met due to ineffective management of water sites.				
Risk 3 – A failure to recognise all existing water site assets				
meaning that some may fall into disrepair or become				\checkmark
dangerous				
Risk 4 – A lack of maintenance of water areas to prevent				\checkmark
them from becoming hazardous				
Risk 5 - Potential lack of adequate staff training for				\checkmark
appropriate roles covering water areas				
Risk 6 - Inadequate insurance cover meaning that the			\checkmark	
Council's legal obligations cannot be met				
Risk 7 - Complaints received about water sites are not being		1		
recorded, investigated, monitored and resolved in a timely manner		v		
Risk 8 - Risks for each water site have not been identified,				
recorded and monitored adequately – including health and				\checkmark
safety risks, injury risks and emergency procedures				
OVERALL AUDIT OPINION				~

NO. FINDING AGREED OFFICER **ACTION** & DATE **Policy/Procedures** The Council approved and adopted a Water Safety Policy in 2016, Chris Walmsley The Head of Streetscene and Waste will review the 1 however testing identified that the policy contains outdated existing Water Safety policy to ensure it is fit for purpose information, has not been updated since inception, does not reflect and reflects current operations. Once reviewed formal current operational arrangements across all water sites. There is approval will need to be obtained and the policy will need March 2024 also a general lack of awareness and access to the policy for to be shared widely amongst officers with responsibility in officers/teams maintaining water sites the policy can be largely the process. considered as non-operational. The Water Safety Policy needs to be reviewed as soon as possible to ensure that it continues to meet the needs of the Council and reflects the resources available within the Streetscene team. Formal policy approval should be sought and once agreed should be shared openly with the operational team to ensure awareness and the operation of robust arrangements to safeguard officers and the public. Site Identification 2 Identified open water sites are listed within the appendix to the Whilst it is recognised that most water sites have been Chris Walmsley Water Safety Policy, however our review identified that an identified and plotted on the Alloy Asset Management additional site had been adopted and maintained since the system, additional work is required to align sites with the March 2024 implementation of the policy and had not subsequently been reviewed Water Safety Policy. A process to ensure new water sites are identified and scheduled for inspection included within this core list. needs to be established and awareness raised It is essential that the Council maintain a core record of all open throughout the responsible teams. water sites that it is responsible to clearly identify location and condition and help identify any costs/risks associated with them.

MANAGEMENT ACTION PLAN

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Appendix B

Insp	ection Regime		
3	Water site risk assessments that inform the nature and frequency of inspection, and the level of monitoring required at each site, are in need of urgent review as they have not been revisited since the policy was implemented; and a completed/documented risk assessment has not been undertaken for the newly adopted site. Furthermore, a review of available risk assessments identified a lack detail of the methodology/criteria carried out and does not provide sufficient rationale to support the risk profile assigned to each water site.	Water site risk assessments will be reviewed by the Streetscene & Waste service to ensure they are up to date and reflective of the current risk profiles of each site. This will detail the decision-making methodology that supports the rationale behind inspection frequency, signage and rescue equipment.	Chris Walmsley October 2023
4	Testing established that 53% of the open water sites (excluding high risk) listed within the Water Safety Policy are not subject to inspection, despite an initial risk assessment taking place and a frequency of inspection outlined. Additionally, a review of the Alloy Asset Management System, utilised for recording inspection data, highlighted records are not available for 3 water sites.There is a risk that the Council may struggle to demonstrate that it is meeting its responsibilities as landowner under the Occupiers Liability Act by not ensuring sites are assessed and inspected on a regular basis, and that sufficient evidence of inspections is retained.	All water sites will be inspected by the Ranger Service. This will be completed by June 2023.	Chris Walmsley June 2023
5	For water sites that are subject to inspection it could not be evidenced that the standard of inspection outlined within the policy was attained for all inspections undertaken. The input fields on the Alloy Asset Management System do not match Policy requirements and no accompanying notes were provided for further insight to the findings/outcomes.	The Alloy Asset Management System will be amended to reflect the inspection requirements set out in the Water Safety Policy. This will also include accompanying notes to allow inspecting officers to write their findings/outcomes.	Chris Walmsley June 2023
6	Although testing identified that reported defects were addressed within one month of the reported date a specific requirement of the Policy relating to the categorisation of reported defects into high,	The Alloy Asset Management System will be amended to reflect the defects categories set out in the Water Safety Policy.	Chris Walmsley June 2023

	 medium and low risk is no longer operational and does not appear to be supported by Alloy. Additionally, limited information was available on Alloy to establish what the specific nature of the reported defect was and what remedial action was undertaken. Consideration should be given to re-establishing the categorisation of reported defects as per the Policy to ensure that essential/high risk remedial action are prioritised and dealt with within a suitable timeframe. 		
Mana	agement		
7	 Whilst it was apparent that some supervisory checks are being undertaken within the Streetscene Service no evidence was available to support that checks are being carried out specifically for water sites to ensure that the inspection programme is being robustly carried out and defects are being correctly identified. A programme of periodic supervisory checks should be introduced to ensure that standards are maintained, and a consistent approach applied across all water sites by all teams. 	Periodic supervisory checks will be expanded to cover the Rangers. These will be recorded in the Alloy Asset Management System.	Chris Walmsley June 2023
Healt	th & Safety		
8	 Working near water is an inherent risk and safety measures should be adopted to safeguard officers from harm. Risk assessments are essential to help identify specific site risks and provide officers with the tools to help manage this risk. A review of the available risk assessments for working near water highlighted further work is required as the risks and controls are not site specific and are not reflective of the individual conditions and the full range of hazardous activities undertaken for each body of water. 	The Streetscene & Waste Service will work with the H&S team to assess the requirements for each site-specific risk assessment and safe systems of working near water. This will consider individual conditions and the full range of hazardous activities undertaken for each body of water. The review will be aligned with the migration to the new HARRIET (Hazard Assessment, Risk Review, Identification and Evaluation Tool) system.	Chris Walmsley March 2024

	In addition, testing identified that the Service does not have Safe systems of work (SSOW) in place in relation to working near water. Adopting robust SSOW for employees working in or around water will help demonstrate that the Council is meeting it responsibility under the Health & Safety at Work Act 1974.		
9	All employers have a legal duty to ensure the safety of their employees whilst they're at work, this includes ensuring that lone workers are as safe as possible and our review highlighted that the Rangers team have recently been provided with Solo Protect devices as they work alone on weekends. To further strengthen lone working arrangements a formal procedure needs to be developed within the Service outlining the arrangements to be followed to manage the risks of working alone keeping officers healthy and safe.	Lone Working arrangements will be formalised in a procedure to reflect the needs of the service.	Chris Walmsley September 2023
Safety	/ Equipment/Signage	•	
10	It is evident water safety signage and equipment is present across many of the Councils water sites to help ensure greater awareness of the potential dangers of water, however the site specific risk assessments do not provide the assessment criteria and rationale to support the level of signage/equipment provided at each site. Site specific risk assessments should be reviewed to include this requirement and safety equipment checks needs to be considered when the frequency of inspections is assigned.	See action 3	See action 3
Traini	ng	·	
11	A Training Matrix is in place for the Streetscene service however it was not fully up to date at time of review and it is unclear if bespoke	The Waste & Streetscene Service will liaise with Organisational Development to ensure all training	Chris Walmsley

	training has been provided for officers specifically working on or near water including the following elements:	records are held centrally on the Learning Hub.	September 2023
	 Standards that are expected (policy awareness); Legal requirements and implications of work undertaken (including safety equipment); Safe systems of work/risk assessments specific; Incidents/emergency procedures. 		
12	 Consideration has been given to the level of First Aid provision within the Ranger Team however based on the training records provided we were unable to confirm that there has been an assessment of First Aid provision for employees working across all water sites. To ensure the council meets it's requirements under The Health and Safety (First Aid) Regulations 1981, an assessment of first aid needs is to be completed to determine the type of first aid provision needed and the type of equipment that should be provided for employees. 	The service has considered First Aid provision and provided assurance that the council meets its requirements under The Health and Safety (First Aid) Regulations 1981.	Complete
Recr	eational use of Council Water Sites		
13	Our review established that there is a lack of established procedure for obtaining a lease/license for use of the Council's open water site. A core register of users was not available, and testing identified only one long-standing lease for the use of Yarrow Valley Park – Big Lodge by a local recreational club. Arrangements have been in place continually since 1992 and there was no evidence of ongoing review during this period. After enquiries made during the course of this review the arrangement has now been passed to Legal Services to ensure that the terms and conditions outlined within the original lease continue to meet the requirements of the Council as landowner.	The Commercial Directorate will undertake a piece of work to identify clubs/groups currently using the water sites for recreational use, creating a core register of users. The service will need to ensure a valid up to date lease is in place for use of Council water to clearly define the responsibilities of the leaseholder and the Council. This will then need to be regularly reviewed.	Adam Nickson July 2023

	A valid up to date lease is essential to ensure that the responsibilities of the leaseholder and Council are clearly defined.		
Prom	noting Water Safety		
14	Risk management practices such as education campaigns are essential to preventing incidents. Testing found that a program of Summer Water Safety sessions outlined in the Water Safety Policy are no longer being delivered.	The service will review delivering water safety sessions and assess in line with the availability of resources within the service.	Chris Walmsley September 2023
	As the Council has recently suffered a fatality at Yarrow Valley Country park, as part of the Policy refresh consideration should be given to water safety sessions as these can play a key role in tackling water safety and educating residents about the risks posed by water.		
Risk	Management		
15	An open water specific register should be drafted so ensure that the unique risks associated with managing water sites across the borough are adequately captured, monitored, and regularly reviewed. This should be added to the Grace risk management system to ensure the information is kept up to date.	The Head of Streetscene & Waste will complete a water specific risk register in Grace to assess the risks associated with managing water sites.	Chris Walmsley July 2023

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Agenda Item 10

Chorley Council & South Ribble Borough Council

FINAL Internal Audit Report

GDPR- Data Retention 2022/2023

Audit Assurance: Limited Auditor: Struan Jackson Date Issued: 15th March 2023





Reason for the Audit & Scope

1 UK organisations that process personal information need to comply with the Data Protection Act 2018/UK General Data Protection Regulations (UK GDPR) and are required to create a data retention policy to help manage the way personal information is handled and stored.

A Data Retention Policy outlines why and how data is stored, outlines how long data will be kept and how this will be disposed of, it is also fundamental to the organisations overall data management and regulatory compliance. All corporate records including emails and attachments must be managed in accordance with the Council's Data Retention Policy.

2 The review is included in the 2022/23 Audit Plan approved by the respective Governance Committee on 27th September 2022 & 23rd November 2022.

Audit Objectives

- 3 The overall objective of the audit was to provide an opinion of the adequacy, application and reliability of the key internal controls put in place by management to ensure that the identified risks are being sufficiently managed.
- 4 The audit also assessed the effectiveness of the various other sources of assurances using the three lines of defence methodology.

Audit Assurance

5 The Head of Internal Audit is required to provide the Governance Committee with an annual audit opinion on the effectiveness of the overall control environment operating within the Council and to facilitate this each individual audit is awarded a controls assurance rating. This is based upon the work undertaken during the review and considers the reliance we can place on the other sources of assurance.

6 Our evaluation of the reliance we can place on the three lines of defence is shown in Appendix A.

- 7 Both Councils have developed a suite of data management policies and operational guidance designed to ensure compliance with the requirements of GDPR, including the following documentation that aid and provide direction to officers in relation to data retention practices:
 - Record of Processing Activities (SRBC)/ Information Asset Registers (CBC);
 - Records Management Policy (SRBC)/Data Usage and Data Retention and Erasure Policy (CBC)
 - Data Retention Schedules;
 - Privacy notices.

Testing identified that although both Councils have established suitably comprehensive policies and guidance there is a lack of ongoing review and monitoring to ensure that the policies and associated documentation continues to reflect the data management processes operating within the organisation. Specific weakness identified for both Councils in relation to data policies/procedures were:

- Data management policies and associated guidance lack regular review and contain inaccuracies and out of date references relating to organisational structure and officer roles and responsibilities;
- A number of inconsistencies were identified with the data retention periods outlined within the ROPA/Information Asset Registers, Data Retention Schedules, Privacy Notices published on Council webpages, and the actual practices identified to be operational within the Service. These practices need to be aligned to ensure a consistent approach is adopted and clear and accurate information is provided to the public.
- The ROPA has not been routinely updated in line with changes in structure and responsibilities across the organisation and some data records need an updating where the responsibility for the data has changed from one Information Asset Owner (IAO) to another. Maintaining effective

In accordance with the Public Sector Internal Audit Standards, internal audit has been the subject of an independent external assessment, which concluded that the 'internal audit activity conforms to the Standards'

records of the organisation's data processing activities is an important obligation under The Data Protection Act 2018/UK GDPR and further work is required to the Council's ROPA to ensure that it accurately reflects each organisation's current data processing environment.

• Poor accessibility to the ROPA/Information Asset Registers with a general lack of awareness amongst key officers to the location of each document.

Practices put in place to maintain focus and awareness of UK GDPR legislation appear to have waned with little evidence of cross-Council Data Management Groups operating; and routine reminders to Information Asset Owners (IAO) regarding their Record of Processing Activities (ROPA) responsibilities reducing in frequency. Completion rates for mandatory GDPR training developed to maintain staff awareness currently fall short of the 85% completion target for mandatory modules outlined within the SLT Corporate Health Dashboard (47% SRBC and 71% CBC).

Suitable guidance is available for the disposal and deletion of data at both Councils however, the majority of service areas sampled across both Council's showed poor adherence to the policy with multiple instances of storing data for a period of time exceeding that outlined in the service's ROPA/Information Asset Register/Retention Schedule/Privacy Notice; and exhibiting little awareness of the data archiving/deletion capability of the customer management system software that they were utilising. Additionally, the respective data management policies outline a specific requirement to maintain a register of destruction of records for data disposals/deletions, particularly for large scale data disposals, however, there were no examples of this being maintained for the services sampled.

Due to the number of essential improvements required to strengthen the current operational arrangements which are detailed in the action plan at Appendix B a **Limited** assurance rating has been awarded for this review. The Senior Information Risk Officer (SIRO) and the Data Protection Officer (DPO) were notified of the control weaknesses reported above during the course of our review and have committed to implement additional controls to improve management oversight and governance arrangements for compliance with GDPR these are outlined within the Management Action Plan at Appendix B.

Control Rating Key

Full – the Authority can place complete reliance on the controls. No control weaknesses exist.
 Substantial - the Authority can place sufficient reliance on the controls. Only minor control weaknesses exist.
 Adequate - the Authority can place only partial reliance on the controls. Some control issues need to be resolved.
 Limited - the Authority cannot place sufficient reliance on the controls. Substantive control weaknesses exist

Risk and Controls	SRBC Control Evaluation	CBC Control Evaluation
Risk 1 – Lack of organisational data retention policy		
GDPR Data Management Group operational.	Action 1	Action 1
Records management policies and procedures are in place.	Action 2	Action 2
Policies/guidance is accessible for officers.	Action 3	Action 3
Officer affirmation of compliance with the Information Security Framework and associated data policies.	Action 11	Working as Intended
Officer mandatory GDPR training to support policies.	Action 4	Action 4
Risk 2 – Privacy notices are not in place or do not		
reflect operational arrangements		
Corporate and service specific privacy notices are in place.	Working as intended	Action 12
Privacy notices comply with the Information Commissionaire Office (ICO) requirements.	Working as intended	Working as intended
Privacy notices data retention information reflects operational requirements.	Action 5	Action 5
Risk 3 – The ROPA (Record of Processing Activity) /		
Information Asset Register does not accurately reflect		
the type of records processed.		
The ROPA / IAR's accurately records the data collected and	Action 6	Action 6

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Action 6
Action 6
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Action 7
Action 8
Action 2
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Action 2
Action 5
Action 5
Action 9
Action 9
Action 2
ended Working as intended
Action 3
Action 9
•

*Additional risks and controls identified by Internal Audit to be added to GRACE

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Appendix A

AUDIT ASSURANCE

Three Lines of Defence

Audit Area	1 st Line	2 nd Line	3 rd Line	Internal Audit opinion
GDPR- Data Retention	Service Managers	Data Protection Officer	Internal Audit	Currently reliance cannot be placed on the first line of defence as the services exhibited poor adherence to the organisations data management processes and associated guidance.

Risk and Control Evaluation

Risks Examined	Full	Substantial	Adequate	Limited
Risk 1 – Lack of Organisational data retention policy				\checkmark
Risk 2 – Privacy notices are not in place or do not reflect operational arrangements			✓	
Risk 3 – The ROPA (Record of Processing Activity) does not accurately reflect the type of records processed.				\checkmark
Risk 4 – Record retention schedules are not in place for each service and do not reflect practices outlined in privacy notice				✓
Risk 5 - Records are retained for longer than required				\checkmark
Risk 6 – Procedures are not in place to delete and dispose of records securely in compliance with the Data Retention Policy or service retention schedules.				~
OVERALL AUDIT OPINION				~

Appendix B

	MANAGEMEN	IT ACTION PLAN	
NO.	FINDING	AGREED ACTION	OFFICER & DATE
South	Ribble & Chorley Findings		UDAIL
1	Our review established that GDPR/Data Groups effected to support both Council's ongoing requirements of UK GDPR/Data Protection Act 2018 are no longer meeting and cannot be considered as operating. During the course of our review this weakness was acknowledged by the SIRO and DPO and commitment was provided to establish both a Data Owners Group and a Shared Information Security Council encompassing both organisations.	Agreed – The Information Security Council is to be re- established to take the strategic ownership and monitoring of performance. It will meet on a quarterly basis and will consider: the Register of Processing Activity; receive reports from Data Owners Group changes to policies retention periods new data use receive reports of ICO reporting.	Director of Governance June 23
2	Testing identified that both Councils have comprehensive policies in place that provide guidance to officers on the management, use, retention and deletion of data, however, testing identified a lack of regular review resulting in inaccuracies/errors with organisational structure/roles and responsibilities, and incomplete data retention schedules that do not reflect the current needs each service and the organisation as a whole.	A new suite of policies has been drafted and will be presented to SMT for review / approval. New policies include: Data Breach policy; Data Protection policy; Data Retention and Erasure policy; Data Usage policy; Information classification policy; Subject access request policy. Once agreed with SMT, policies will be shared and awareness raised.	Director of Customer and Digital June 23
3	Data management policies and other associated data related	Agreed – awareness will be raised via SLT / core briefs and a	Director Customer

	 guidance material can be found on both Council's intranets however, these were not easy to locate, do not align, and contain links to empty folders/missing information. Furthermore, testing identified that many key officers were uncertain where to locate this documentation. To ensure that accurate, relevant and up to date information is available to officers to support the data management policies, processes and legal requirements the guidance on both Council's intranets should be assessed and updated as soon as possible; and given suitable prominence on the Council's intranet. 		and Digital June 23
4	Testing established that the completion rates for the GDPR mandatory module within Learning Hub falls short of the 85% completion target for mandatory modules outlined within the SLT Corporate Health Dashboard (47% SRBC and 71% CBC). Further work is required to ensure that all Council staff complete the mandatory training. During the course of our review this weakness was acknowledged by the SIRO and DPO and commitment was provided to review data management training requirements.	Agreed by SMT. Each member of SMT to ensure that mandatory training is completed by all Council staff.	Senior Management Team September 2023
5	Privacy notices are available to the public on both Councils websites and our review confirmed that the format of privacy notices sampled complied with the Information Commissionaire Office (ICO) requirements. However, further comparison of the sampled privacy notices against corporate data retention schedules found that the information provided was not aligned for a number of services reviewed.	Agreed by SMT Each member of SMT will ensure that privacy notices are reviewed and updated to reflect the current data retention schedules.	Senior Management Team September 2023

	There is a need for services to ensure that the information on the data retention schedules is accurate and that this information matches that provided to customers within the published privacy notice to ensure that the Council is being clear and transparent with how it is handling personal and sensitive data.		
6	Testing identified that both Councils have a Record of Processing Activities (ROPA/Information Asset Register) that provides an overview of the organisations data processing activities however, a review of these documents identified that they are not fully completed and are not being revisited and updated on a regular basis in line with corporate guidance.	Agreed by SMT. Each member of SMT will ensure that the ROPA / Information Asset Registers are updated and accurately reflect current operational activity.	Senior Management Team September 2023
	Both Council's need to ensure that the ROPA is suitably comprehensive covering all services areas/functions; and that they have effective processes in place to keep the ROPA record up to date. A poorly maintained ROPA may put the Council at risk of not meeting its obligations under the DPA 2018/UK GDPR.	The Information Security Council will ensure that going forwards ROPAs / Information Asset Registers are maintained.	
7	Our review identified issues at both Councils with the prominence and accessibility of the ROPA/Information Asset Register/s. During the course of our review the document was either not readily available on the intranet (SRBC), or it was located on a page that was hard to locate/poorly labelled (CBC).	Agreed – awareness will be raised via SLT / core briefs and a dedicated page on the intranets will be established	Director Customer and Digital June 23
	It was acknowledged during the course of our review that access to the ROPA was reinstated for SRBC, however further consideration should be given to the prominence/location of this document at both Council's so that the ROPA can be easily accessed and readily available to officers (IAOs) tasked with adding, removing and amending the information contained within.		

8	Evidence was available to show that an email reminder has been issued by the Data Protection Officer within the last 12 months to maintain IAO awareness of the ROPA/Information Asset Register and their associated data management responsibilities however, the frequency of reminders has decreased since this was last reviewed by Internal Audit in March 2022.	Agreed – this will form part of the monitoring undertaken by the Information Security Council and reminders / updates will be requested on a quarterly basis.	Director of Governance June 23
9	It is a requirement of both Council's data management policies that "personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which the personal data are processed". The review highlighted a number of service areas across both Council's failing to follow the data retention/deletion requirements of	Agreed by SMT Each member of SMT will ensure that their Directorates review data held (both paper based and electronically) to ensure compliance with their data retention schedules.	Senior Management Team September 2023
	the data management policies holding data in excess of business need and/or for a period of time exceeding that outlined in the ROPA/Information Asset Register/Retention Schedule/Privacy Notice.		
	Furthermore, services sampled also exhibited little awareness of the data archiving/deletion capability of the customer management system software that they were utilising to process personal data.		
10	A specific requirement of the respective data management policies for each Council is to maintain a register of destruction of records for data disposals/deletions. Where our testing did identify examples of good data management and expired data had been deleted in accordance with the agreed arrangements, a register of disposal had not been maintained.	Agreed by SMT Each member of SMT will ensure that a register of destruction of records for data disposals is completed and maintained going forwards.	Senior Management Team September 2023

Carrila	Dikkle Only Findings		
	Ribble Only Findings		
11	Prior to logging into the Council's joint network each day officers are required to affirm that they understand and agree to the requirements of the Information Security Framework and its associated data policies including the Corporate Data Usage Policy (CDUP). Testing identified that the CDUP is not available to South Ribble officers on Connect or via the Learning Hub and appears to be a CBC only policy, not applicable to South Ribble officers.	Shared policies being developed and awareness to be raised.	Complete
Chorle	ey Only Findings		
12	Testing identified that Legal Services did not have a privacy notice in place and available to view on the Council's website.	Agreed – Privacy notice will be placed on the website	Director of Governance
	To comply with the requirements of GDPR, privacy notices are required where personal data is processed.		June 23
	Outside the agreed scope for this review, testing identified that there is the opportunity to align processes and policies given the expansion of shared services between Chorley Council and South Ribble Council and the similarity of the Council's data processing requirements. This option should be explored further when considering actions for the above findings.	See action 2	
	During the course of our review this weakness was acknowledged by the SIRO and DPO and commitment was provided to align and re-publish data management policies across both Councils.		

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Governance Committee Work Programme 2023/24

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Report	Officer
Review of the Effectiveness of Internal	Dawn Highton
Audit	_
Audit and Risk Annual Report and Opinion	
2022-2023	
External Audit Progress Report	Grant Thornton
External Audit Plan 2022-23	Grant Thornton
Management Response to External Audit	Louise Mattinson
Planning Enquiries – 2022-23	
Charities and Trust Funds – 2022-23	Louise Mattinson

2 August 2023

Report	Officer
External Audit Progress Report	Grant Thornton
Treasury Management Outturn 2022-23 and Qtr1 Treasury Monitoring Report 2023-24	Louise Mattinson
CIPFA Resilience Index 2021-22	Louise Mattinson

27 September 2023

Report	Officer
Internal Audit Plan Oct 23 – March 24	Dawn Highton
Audit and Risk Interim Report	Dawn Highton
External Audit Progress Report	Grant Thornton
Draft Core Financial Statements 2022-	Louise Mattinson
23	

29 November 2023

Report	Officer
External Audit Progress Report	Grant Thornton
Statement of Accounts 2022-23	Louise Mattinson
Treasury Management Mid-Year Review 2023-24	Louise Mattinson



17 January 2024

Report	Officer
Audit and Risk Interim Report	Dawn Highton
External Audit Progress Report	Grant Thornton

13 March 2024

Report	Officer
Internal Audit Plan April 24 – Sept 24	Dawn Highton
External Audit Progress Report	Grant Thornton