



City of Lincoln Council

Internal Audit Annual Report – 2018/19



This report has been prepared solely for the use of Members and Management of City of Lincoln Council. Details may be made available to specified external organisations, including external auditors, but otherwise the report should not be used or referred to in whole or in part without prior consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended for any other purpose.

The matters raised in this report are only those that came to our attention during the course of our work – there may be weaknesses in governance, risk management and the system of internal control that we are not aware of because they did not form part of our work programme, were excluded from the scope of individual audit engagements or were not brought to our attention. The opinion is based solely on the work undertaken as part of the agreed internal audit plan.

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Distribution List

Chief Executive & Town Clerk; Directors, Chief Finance Officer, City Solicitor, Leader of the Council, Chair, Audit Committee.

Management Summary

Purpose of Annual Report

The Annual Internal Audit Report of City of Lincoln Council aims to present a summary of the audit work undertaken over the past year. In particular:-

- Include an opinion on the overall adequacy of and effectiveness of the governance framework and internal control system and the extent to which the Council relies on it;
- Inform how the plan was discharged and the overall outcomes of the work undertaken;
- Draw attention to any issues particularly relevant to the Annual Governance Statement.

Figure 1

Key	
Red	Inadequate Performance – Critical action required by management throughout the Council.
Amber	Performing Adequately – Some improvement required to manage a high risk in a specific business area and medium risks across the Council.
Green	Performing Well – No concerns that significantly affect the governance framework and successful delivery of the Council priorities

Direction of Travel

No change -stable	Improving	Reducing
		

Opinion on the Governance Framework and Internal Control Environment

For the twelve months ended 31 March 2019, based on the work we have undertaken and information from other sources of governance, my opinion on the adequacy and effectiveness of City of Lincoln Council's arrangements for governance, risk management and control is shown in Figure 1 below;

There were two limited assurance audit reports (see Appendix 1)

Governance	Green
Risk	Green
Internal Control	Green
Financial Control	Green
Direction of travel – static	

How we came to our opinion

Governance – *“If management is about running the business
– Governance is about seeing that it is run properly”*

Local Government has been and will continue to undergo significant change. The way it operates and delivers services – either directly, with or through other organisations will provide challenges for managing risk, ensuring transparency and demonstrating accountability. The importance to aim for the standards of the best and ensuring governance arrangements should not only be sound but also seen to be sound has never been greater.

Good governance underpins everything the Council does and how it delivers services often comes under close scrutiny. It is therefore vital that resources focus on agreed policy and priorities; that there is sound and inclusive decision making with clear accountability for the use of those resources. This ensures that the Council achieves the desired outcomes for the people of the City of Lincoln Council.

The Audit Committee helps to ensure that these arrangements are working effectively. They regularly review the governance framework and consider the draft and final versions of the Annual Governance Statement (AGS).

New CIPFA guidance on Delivering Good Governance in Local Government was produced in 2016. An assessment against the requirements was completed and formed the basis of the Council's Code.

High-level governance audit work in 2018 and 2017 did not identify any significant issues and recommendations have been implemented.

We had no internal audits that were low or limited assurance in areas of Corporate Governance.

The External Audit 'Report to those charged with governance (ISA260) 2017/18 reported that the Council's Annual Governance Statement complies with guidance issued by CIPFA / SOLACE.

Officers and members have maintained a focus on the AGS significant issue (DP/GDPR) during the year, and following a recent substantial assurance audit it is being reconsidered as an issue for the 2019 AGS.

Our work on values and behaviours, which is part of the Council's corporate governance arrangements, is ongoing.

There were some Governance areas within our Combined Assurance assessment which were Amber assurance; however these all have mitigation in place. Some are being considered for the 2019 AGS.

Changes to the project management framework in 18/19 have not worked as expected in all areas and management are considering improvement actions.

Whilst there is partnership management guidance and a register the operation of the monitoring framework requires further improvement.

There are still some timescale issues for obtaining financial and legal advice to meet committee report deadlines.

Taking the above information into account we have assessed the governance framework as **green** – performing well.

Internal Control

We took account of the outcome of our internal audit work during the year. Our work identified only one area where a 'Limited' assurance opinion was given.

At the end of March there were a small number of high priority audit recommendations which are in progress but remain to be fully implemented, including updating and re-issuing Sys Admin guidance for IT applications, IT Security training, reviewing IT Security policies and introducing Housing pre-tenancy processes.

Our Combined Assurance report for 2018/19 showed that the Council continues to have high levels of assurance (75% Green, 24% Amber and 1% Red).

We took account of external audit's 2017/18 annual opinion on statement of accounts, VFM opinion and grants report.

We took account of our counter fraud work during the year. There were no significant internal control issues.

See also comments in the risk and governance sections which also apply to internal control.

Taking all of the above information into account we have assessed the internal control environment as **green** – performing well.

Risk Management

There is an established risk management framework in place for the Council to manage the key risks facing it at strategic and operational levels, with regular reporting to management and members.

Risk management audits in 2018 and 2017 both provided substantial assurance. Risk management was given a GREEN assurance as part of the Combined Assurance work.

“Risk” overall is well managed both formally and informally; Strategic and Directorate risks are being well managed with regular reviews.

The Council receives professional risk management support from Assurance Lincolnshire - comprehensive guidance has been given to officers and members during 2018/19.

Our internal audits have not identified any significant issues in this area and any risk management recommendations have been implemented.

There is an annual Risk Management report to Audit Committee – the 2018/19 report did not identify any issues.

On this basis we have assessed risk management as **green** – performing well.

Financial Control

Our work provides an important assurance element to support the External Auditor's opinion on the Council's Statement of Accounts.

During the year we reviewed:

- Commercialisation – Substantial
- City Lottery – Advice given & accepted
- Transport Hub Final Account – Substantial
- Corporate Property Income – High
- Council House Sales – Substantial
- Bank Key Controls – High
- Fees & Charges – Substantial
- CIL & S106 – High
- Business Rates Growth Policy – Advice given & accepted
- Procurement – Substantial (not yet finalised)

The Council has good financial management processes in place that work well. Our work identified no areas where a 'Limited' or 'Low' assurance opinion was required.

We took account of external audit's 2017/18 annual opinion on statement of accounts, VFM opinion and grants report

We note the current positive position on the savings / transformation programme (TOFS), future savings required and the current 2019/24 MTFS. Savings were slightly below the target level in 18/19 but this is manageable and there is an active programme in place to deliver the 19/0 target. Reserves remain at a prudent level.

Taking the above information into account we have assessed financial control as **green** – performing well.

Roles and Responsibilities

The Council is responsible for establishing and maintaining risk management processes, control systems and governance arrangements. Internal Audit plays a vital role in providing independent risk based and objective assurance and insight on how these arrangements are working. Internal Audit forms part of the Council's assurance framework.

Where Internal Audit work has identified improvements, we have worked with management to agree appropriate corrective actions and a timescale for improvement. It is the responsibility of management to implement the agreed actions.

The Council is responsible for developing and publishing an Annual Governance Statement – reporting how they have monitored the effectiveness of their governance arrangements during the year – providing information on any significant governance issues.

The Annual Internal Audit Report should inform the Annual Governance Statement. We recommend that the "low or limited" assurance areas identified in Appendix 1 are considered in the development of the Council's Annual Governance Statement together with the information contained in the Council's Combined Assurance Status Report reported earlier this year linked to Amber or Red assurance areas. There was one Red assurance area – Choice Based Lettings / Housing Allocations. We are not aware that any of the Amber assurance areas have worsened.

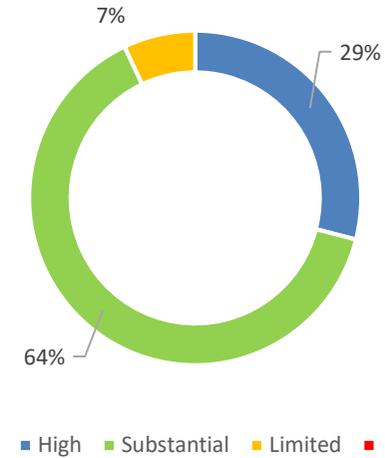
Scope of Work

19. The charts in **Figure 3** shows the assurance opinions given in 2018/19 compared to those in 2017/18. Our audit plan includes different activities each year – it is therefore not unexpected that these vary; however, the assurance levels do give an insight on the application of the Council's control environment.
20. The overall assurance levels have remained broadly similar during 2018/19.

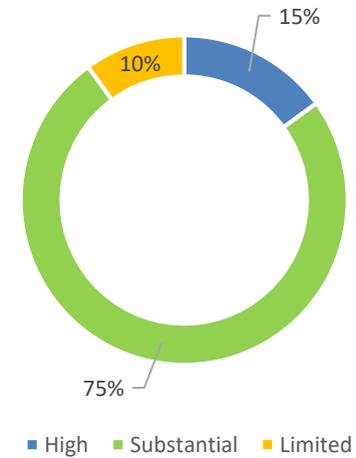
Comparison of Assurances (finalised audits only)

	2018/19		2017/18	
High	4	(29%)	3	(15%)
Substantial	9	(64%)	15	(75%)
Limited	1	(7%)	2	(10%)
Low	0		0	

Assurance levels 2018/19



Assurance levels 2017/18



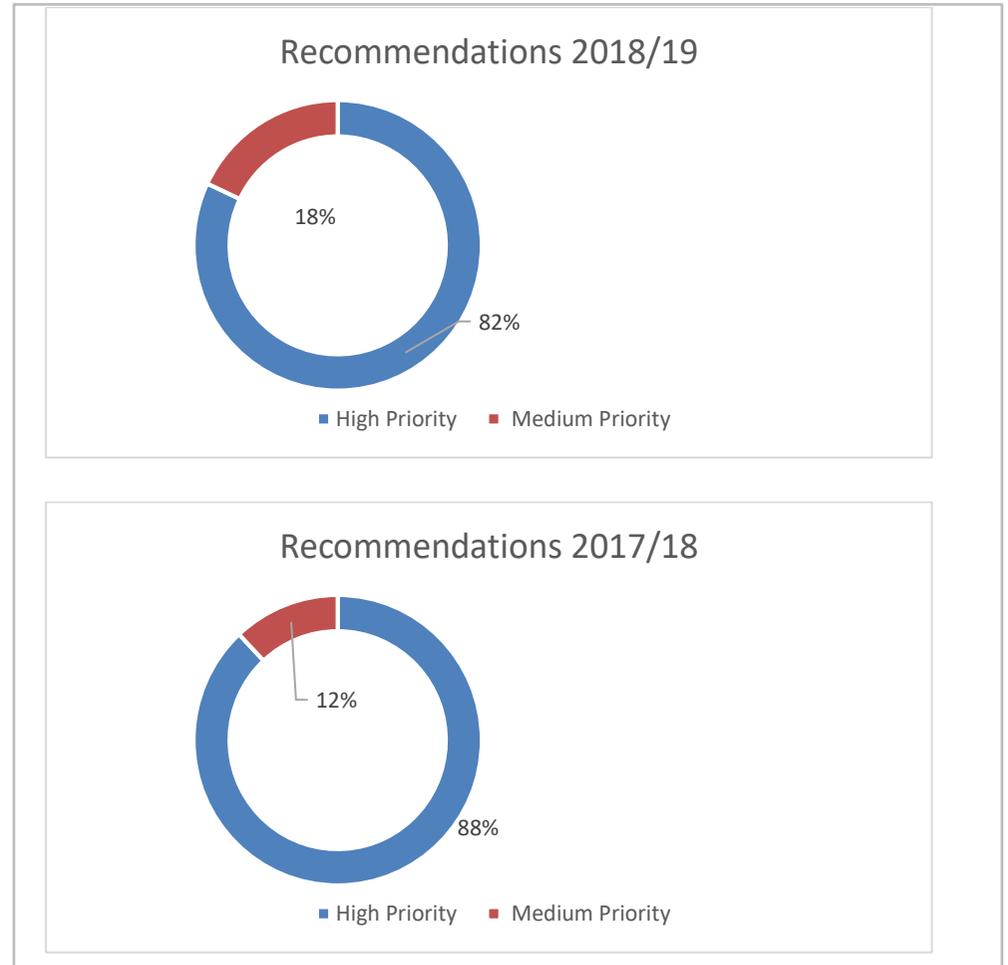
21. The charts in **Figure 4** show the comparison of internal audit recommendations made in 2018/19 compared to 2017/18. Details of systems reviewed can be found in Appendix 1
22. We track the implementation of agreed actions. Over the year management have implemented 79% of the recommendations due by the 31st March 2019, an increase from 2017/18 (65%). Details of outstanding recommendations can be found in Appendix 1.

Number of recommendations made (finalised audits only)

	2018/19	2017/18
High	8	12
Medium	36	90
Total	44*	102

- ****NB some audits being finalised and these numbers are not included – they may be included for the June audit committee***

Figure 4 – Recommendations Made



Delivery of internal audit plan 2018/19

23. The Audit Committee approved the 2018/19 audit plan. We delivered 97% of the revised plan by the end of the financial year.
24. Internal Audit's performance is measured against a range of indicators. The table below shows our performance on key indicators at the end of the year. We are pleased to report successful achievement against most of our targets and will be closely monitoring the others to improve performance.

Performance Indicator	Target	Actual @ 31/03/2019
Percentage of plan completed.	100%	95%
Percentage of key financial systems	100%	100%
Percentage of recommendations agreed.	100%	100%
Percentage of recommendations due implemented.	100% or escalated	79%
Timescales:		
Draft report issued within 10 working days of completing audit	100%	82% - 9 out of 11
Final report issued within 5 working days of closure meeting / receipt of management responses.	100%	100% - 11 out of 11
Period taken to complete audit within 3 months from fieldwork commencing to the issue of the draft report.	80%	91% - 10 out of 11
Client Feedback on Audit (average)	Good to excellent	Good to excellent

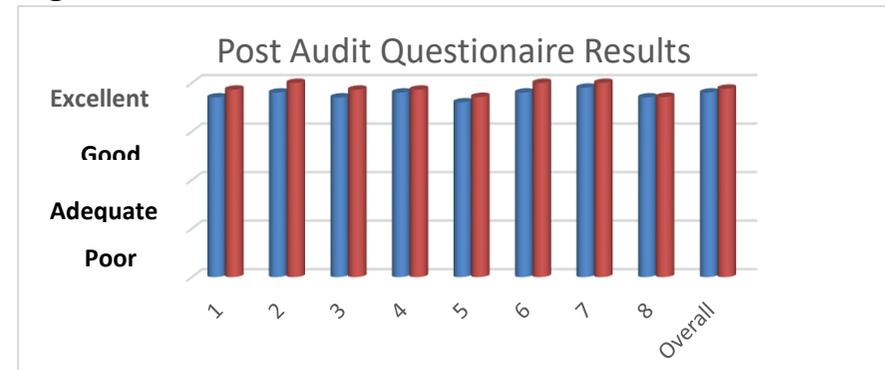
Restrictions on Scope / Disagreements

25. In carrying out our work we identified no unexpected restrictions to the scope of our work and we can confirm that Internal Audit's independence has not been impaired during the year.
26. Audit work is scheduled to fit around the work demands of the client and it is very rare that we have difficulties in gaining access to staff, which results in some delay or inability to deliver planned work within the expected timescales.

Effectiveness of Internal Audit

27. We regularly canvass opinions on audit planning, reporting and communication from management responsible for activities under review. They score the effectiveness of our service as excellent, good, adequate or poor.
28. The table in **Figure 5** outlines the responses by management on our service. For 2018/19 there was a 78% questionnaire return rate, the overall average rating for the service was good to excellent.

Figure 5 – Client Feedback



Key: Blue: 2017/18, Red: 2018/19.

Audit Planning

1. Consultation on audit coverage
2. Fulfilment of scope and objectives

Audit Report

3. Quality of report
4. Accuracy of findings
5. Value of Report

Communication

6. Feedback during the audit
7. Helpfulness of auditor (s)
8. Prompt delivery of report

Quality Assurance

29. We recognise the importance of meeting customer expectations as well as conforming to the UK Public Sector Internal Audit Standards. We continually focus on delivering high quality audit to our clients – seeking opportunities to improve where we can.
30. Our commitment to quality begins with ensuring that we recruit, develop and assign appropriately skilled and experienced people to undertake your audits.
31. Our audit practice includes ongoing quality reviews for all our assignments. These reviews examine all areas of the work undertaken, from initial planning through to completion and reporting. Key targets have been specified - that the assignment has been completed on time, within budget and to the required quality standard.
32. Our Quality Assurance Framework (**Appendix 2**) includes all aspects of the Internal Audit Activity – including governance, professional practice and communication. We are able to evidence the quality of our audits through performance and delivery of audits, feedback from our clients and an annual self-assessment and the annual review of the effectiveness of the Internal Audit Function by the Council.
33. There is a financial commitment for training and developing staff. Training provision is continually reviewed through the appraisal process and regular one to one meetings. A training programme has been developed to ensure that staff are kept up to date with the latest technical / professional information and to ensure that they are equipped with the appropriate skills to perform their role.
34. Assurance Lincolnshire conforms to the UK Public Sector Internal Audit Standards including the Code of Ethics and we can confirm that we are complying with the Core Principles. As part of our quality assurance framework we maintain a continuous improvement plan (QAIP)
35. We have reviewed our internal quality assurance assessments and can confirm that our processes for planning, fieldwork and communicating results adhere to audit standards. Our review work did not identify any significant areas of non-compliance.
36. An external quality assessment was completed in October 2016, which found general compliance with PSIAS, and was reported separately to Audit Committee.
37. Although internal and external auditors carry out their work with different objectives in mind, many of the processes are similar and it is good professional practice that they should work together closely. Wherever possible, External Audit will place reliance and assurance upon internal audit work.
38. 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. We confirm that the internal audit activity is organisationally independent and resources available are adequate.



Appendix 1 Internal Audit Assurances Given 2018/19

Audit Area	Date	Assurance	Total High / Med Recs	Implem'd	Outstanding			Notes	Direction of Travel
					High	Medium	Not Yet Due		
Governance	May 18	High	0					For 17/18 Annual Report	↔
Risk Management	July 18	Substantial	2	1		1			↔
Sincil Bank	August 18	Substantial	9	9					Not previously audited
Housing Benefit Subsidy testing	August 18	N/A	N/A					Testing on behalf of External Audit	
Commercialisation	October 18	Substantial	2	1		1			↔
City Lottery	October 18	Advice work	N/A					3 suggestions made & accepted	
IT Applications	October 18	Limited	8	1	1		6	High revised target - Aug 19	↓
IT – Malware / Anti-virus	November 18	Substantial	11	6	1	1	1	High revised target – Jul 19 and 2 risks accepted.	↔
Transport Hub	December 18	Substantial	2				2		↔
Corporate Property (Income)	January 19	High	1	1					↔
Council House Sales	February 19	Substantial	3				3		↔
Bank (key controls)	February 19	High	0						↔
Sickness Absence F/Up	March 19	Substantial	3				3		↔
Fees & Charges	April 19	Substantial	3				3		Not previously audited
Community Infrastructure Levy & Section 106	April 19	High	0						↑
Business Rates Growth Policy	April 19	Advice work	N/A					Suggestions made & accepted	
Housing Fire Safety		<i>Substantial</i>	See below					Not yet finalised (report being agreed)	Not previously audited
Values and Behaviours		N/A						Not yet finalised	

Appendix 1 Internal Audit Assurances Given 2018/19

Audit Area	Date	Assurance	Total High / Med Recs	Implem'd	Outstanding			Notes	Direction of Travel
					High	Medium	Not Yet Due		
Boultham Park Restoration		<i>(Substantial)</i>	Pending					Not yet finalised (report being agreed)	
Vision 2020 – Project Management		<i>TBA</i>	Pending					Not yet finalised (report being agreed)	
Partnerships		<i>TBA</i>	Pending					Not yet finalised (report being agreed)	
Information Governance / GDPR		<i>(Substantial)</i>	Pending					Not yet finalised (report being agreed)	↔
Procurement		<i>(Substantial)</i>	<i>Pending</i>					Not yet finalised (report being agreed)	↔
Emerging Legislation	May 19	Full	0						
IT Assurance Map		N/A	N/A					Completed. Extended Combined Assurance.	
Private Sector Housing		Advice						Advice only	
De Wint project group		Risk Man advice						Advice only	
Counter Fraud		N/A						Tenancy, training, FRR, policy updates	
New Build Project		Advice							
Total Outstanding			44	19	2	3	18	NB - Figures are for completed audits only (Risks were accepted for 2 recs made). See below	

Appendix 1 Internal Audit Assurances Given 2018/19

During 2018/19 some changes were made to the Internal Audit Plan; these were due mainly to timescale / operational / delivery issues in the audits affected. I do not consider these changes to have had an adverse effect on the delivery of my overall opinion.

Audits postponed to 2019/20 were;

- HR Work Based Learning – service changes (allocation used mainly on Council House Sales audit which required additional testing)
- HR Recruitment – management request (allocation used on existing audits)
- Growth – strategies are being developed during 18/19 (allocation used for the Culture review)
- ICT Strategy – strategy being developed during 18/19 (allocation used on IT Assurance Mapping work)
- Western Growth Corridor project – attended Board meetings and used remainder for Private Sector Housing advice work

Audits removed and allocation used for other work;

- Housing Allocations / Choice Based Lettings – used for risk management support for the New Build Short Life Working Group
- New Build / Housing company – used for risk management support for the De Wint Court project group
- Private Sector Housing Heating Scheme – used to complete the Fire Safety audit
- Programme & Projects post-SPIT – Policy are to do a PIR on this in early 19/20. Used for Boultham Park restoration audit

Total High / Medium 2018/19 Recs Made = 44

Total not yet due = 20

Net = 24

Implemented in full = 19

% Implemented = 79% (H & M)

Appendix 2 - Quality Assurance Framework



Quality outcomes / process designed to deliver a consistently high quality audit service to our clients - fit for purpose / meet client expectations / conform to PSIAS



Quality improvement plan - HIA reporting to Audit Committee on the outcome of Quality Assurance – with improvement action plan and any significant non-conformance included in the Annual Report / Annual Governance Statement



Ongoing monitoring – quality built into the audit process

Quality checks and oversight are undertaken throughout the audit engagement ensuring that processes and practice are consistently applied and working well.



Annual self- assessment

- Head of Internal Audit - develop & maintain Quality Assurance Improvement Programme (QAIP) & improvement action plan
- Focus on evaluating conformance with Internal Audit Charter, definition of Internal Audit, Code of Ethics & the Standards
- Arrange an External Assessment – co-ordinated with Audit Committee (completed 2016)



Periodic quality assurance assessments

- Obtain periodic assurance that engagement planning, fieldwork conduct and reporting /communicating results adheres to audit practice standards
- Provide HIA with quarterly highlight reports on outcome of reviews



- Conduct all audit engagements in accordance with audit practice standards / PSIAS
- Behave at all times in accordance with the Code of Ethics / Code of Conduct
- Promote the standards and their use throughout the Internal Audit activity
- Commitment to delivering quality services



- Obtain on-going assurance that that engagement planning, fieldwork conduct and reporting /communicating results adheres to audit practice standards
- Undertake engagement supervision and review

Appendix 3 - Glossary of Terms

<p>High</p>	<p>Our critical review or assessment on the activity gives us a high level of confidence on service delivery arrangements, management of risks, and the operation of controls and / or performance.</p> <p>The risk of the activity not achieving its objectives or outcomes is low. Controls have been evaluated as adequate, appropriate and are operating effectively.</p>
<p>Substantial</p>	<p>Our critical review or assessment on the activity gives us a substantial level of confidence (assurance) on service delivery arrangements, management of risks, and operation of controls and / or performance.</p> <p>There are some improvements needed in the application of controls to manage risks. However, the controls have been evaluated as adequate, appropriate and operating sufficiently so that the risk of the activity not achieving its objectives is medium to low.</p>
<p>Limited</p>	<p>Our critical review or assessment on the activity gives us a</p> <p>The controls to manage the key risks were found not always to be operating or are inadequate. Therefore, the controls evaluated are unlikely to give a reasonable level of confidence (assurance) that the risks are being managed effectively. It is unlikely that the activity will achieve its objectives.</p>
<p>Low</p>	<p>Our critical review or assessment on the activity identified significant concerns on service delivery arrangements, management of risks, and operation of controls and / or performance.</p> <p>There are either gaps in the control framework managing the key risks or the controls have been evaluated as not adequate, appropriate or are not being effectively operated. Therefore the risk of the activity not achieving its objectives is high.</p>

<p>Significance</p>
<p>The relative importance of a matter within the context in which it is being considered, including quantitative and qualitative factors, such as magnitude, nature, effect, relevance and impact. Professional judgment assists internal auditors when evaluating the significance of matters within the context of the relevant objectives.</p>
<p>Head of Internal Audit Annual Opinion</p>
<p>The rating, conclusion and/or other description of results provided by the Head of Internal Audit addressing, at a broad level, governance, risk management and/or control processes of the organisation. An overall opinion is the professional judgement of the Head of Internal Audit based on the results of a number of individual engagements and other activities for a specific time interval.</p>
<p>Governance</p>
<p>Comprises the arrangements (including political, economic, social, environmental, administrative, legal and other arrangements) put in place to ensure that the outcomes for intended stakeholders are defined and achieved.</p>
<p>Risk</p>
<p>The possibility of an event occurring that will have an impact on the achievement of objectives. Risk is measured in terms of impact and likelihood.</p>
<p>Control</p>
<p>Any action taken by management, the board and other parties to manage risk and increase the likelihood that established objectives and goals will be achieved. Management - plans, organises and directs the performance of sufficient actions to provide reasonable assurance that objectives and goals will be achieved</p>

Appendix 4 - Continuous Improvement Plan

See attached.