



Internal Audit Plan 2017/18

Internal Audit = Risk = Special Investigations = Consultancy

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The Internal Audit Plan represents a summary of the planned audit reviews that the Internal Audit Team will deliver throughout the 2017/18 financial year.

The Audit is based on a risk assessment largely aligned to the eight key themes that contribute to a 'Healthy Organisation' model introduced in 2016/17. Other factors that have driven the plan include direction by senior leadership to other risks linked to the new Business Plan, an annual assessment of the financial controls and grant requirements.

The audit will cost £475,500 which is the same fee as for 2016/17, but will include greater focus on Fraud and Corruption within this cost. Thus, the fee represents a real saving to the Council. The audit plan has been drawn up based on an assessment of risk using areas including those highlighted as key corporate risks arising from the Healthy Organisation assessment; reviews specifically requested by Senior Leaders, or areas that SWAP has identified as potential emerging risks for the Council, including cross cutting reviews being carried out across all SWAP partners to share learning.

Following a reorganisation of the Council's fraud arrangements SWAP has taken on additional responsibilities relating to Fraud and Corruption in 2017/18. A separate Plan for this work has been produced to sit alongside the general audit plan. This work will be absorbed within the 2017/18 fee set out in this report.

The SWAP Internal Audit cost will be £475,500 for 2017/18, that is the same fee as 2016/17 and includes additional responsibilities around counter fraud and corruption. This means SWAP are absorbing all other cost pressures. Performance targets are set out and remain in line with 2016/17. As such the fee represents a real financial saving to the Council.

The key areas of focus are appended to this plan and are based around the following themes:

- Healthy Organisational Reviews
- Management requested reviews
- Financial Controls
- Grants
- Fraud and Corruption

Internal Audit activity reports updating findings and performance against the plan, will be presented to the Corporate Leadership Team and Audit Committee once a quarter, with an Annual Report presented to Audit Committee in June 2018.



The Audit Plan is based on a thorough assessment of the risks facing the Council; its mitigation plans and awareness of prior year findings and those at other authorities.

The level of audit work is then based on our assessment of the three lines of defence to assess where the most value can be added, and where management should be addressing actions.

Approach to Audit Planning 2017/18

The Audit Plan for 2017/18 is based on a risk assessment that been derived from a range of sources:

- Extensive consultations with the Council's Corporate Leadership Team and key Heads of Service.
- Reference to the Council's risk register.
- Audit work at other SWAP partner sites.
- Prior year audit findings, including External Audit recommendations and peer reviews.
- The 2016/17 Healthy Organisation audit review.

The audit planning then takes into consideration the three lines of defence model to determine the extent of audit coverage and work in order to direct resources appropriately, secure greater management buy-in to the control environment and to ensure Internal Audit is recognised as adding value. This concept is introduced in more detail in the diagram on the following page. Working with this model we intend to identify all streams of assurance whether internal or external that contribute to the Council's overall risk, governance and control framework. Internal Audit resources can then be directed at the areas of highest risk; not only known risks but risks that were previously unknown and subsequently identified.

The model operates in most organisations and shows three lines of defence that should be operating:

- 1st Line of Defence Functions that own and manage risks
- 2nd Line of Defence Functions that oversee risk
- 3rd Line of Defence Functions that provide independent assurance



Supporting the Council's Priorities

The Council's Business Plan 2017 – 2027 includes four priorities for the Council:

- Growing the Economy;
- Stronger Communities;
- Protecting those who are most vulnerable; and
- An innovative and effective Council.

Our audit work for 2017/18 seeks to support the delivery of these priorities by ensuring an effective control environment and risk management operates. Each audit contained in the Detailed Internal Audit Plan at Appendix 1 is cross referenced to the priority it principally supports.

Summary of Areas and Related Costs

The Internal Audit Plan is flexible to respond to emerging and changing risks during the year

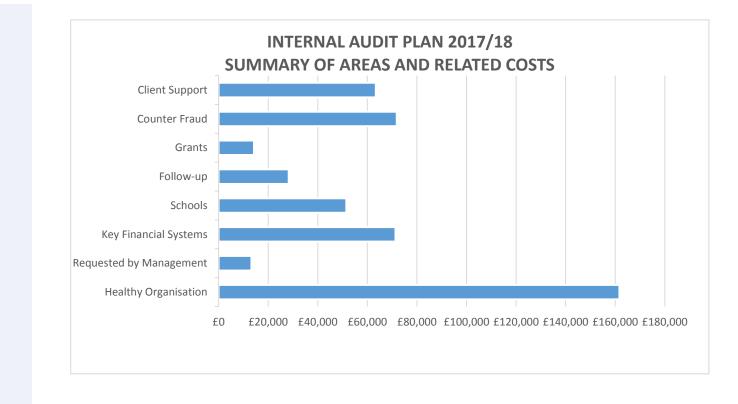
It is recognised that the plan should achieve a balance between clearly setting out the planned work and retaining flexibility to respond to changing risks and priorities throughout the year. The plan therefore contains a number of themes and detailed work programmes that will be developed when audits commence. Any significant changes to the plan during the year will be agreed with the Statutory Officers, along with CLT and reported to the Audit Committee to note.

The total cost of Internal Audit for 2017/18 is £475,500 the same as 2016/17, and a summary of the areas included in the Plan and related costs is shown in the following chart:

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Internal audit work supports the delivery of the Council's priorities.





The Internal Audit Team that will deliver the Internal Audit Plan at Wiltshire Council are qualified with significant experience of audit and the Council.

SWAP Internal Audit Team

Assistant Director:	Ian leads the team and has responsibility for the delivery of the plan.
Ian Withers CPFA, CMIIA, QIAL	Ian has over 30 years' experience of finance, internal audit and has
	held senior positions with a number of large local authorities.
Senior Auditors:	Jo and Kerry are lead auditors responsible for delivery of individual
Joanna Dixon CMIIA	audit reviews. They have extensive experience in local and central
Kerry Chisholm MAAT	government.
Senior IT Auditor:	Stuart is a senior auditor and also the ICT audit specialist in the team.
Stuart Trubee MAAT	
Auditors:	Andrew and Pat have extensive local government finance experience
Andrew Adlam MAAT	with Wiltshire Council. Pat is relatively new to SWAP and currently
Pat Jenkins	studying for the MIIA qualification.
Counter Fraud Specialist:	Nick is a senior auditor based in Taunton and also a counter fraud
Nick Hammacott GCFS	specialist for across SWAP partner organisations, recently leading the South West Fraud Partnership.



The Assistant Director for SWAP reports audit performance on regular basis to the Audit Committee and the SWAP Management Board.

SWAP Performance

The actual performance of SWAP is subject to regular monitoring review by both the Audit Committee and the SWAP Management Board. The performance standards are reviewed regularly across SWAP and for 2017/18 theses are in the following table and will be reported on a quarterly basis to the Audit Committee.

SWAP Performance Standards 2017/18

Performance Indicators	Performance Target	Expected Performance
Percentage of Internal Audit Plan	Audits completed to at least draft	95%
completed	report stage.	
Timescales	- Draft audit reports issued	95%
(Excluding Schools)	within 5 working days of	
	completion of fieldwork	
	 Draft audit reports issued 	100%
	within 10 working days of	
	completion of fieldwork	
	 Final audit reports issued 	95%
	within 10 working days of exit	
	meeting/receipt of	
	management responses	



Quality of Audit Work	Feedback from Client Satisfaction	80%
	Questionnaire within the good to	
	excellent	



Detailed Internal Audit Plan 2017/18

Audit Area	Business Plan Priority	Audit Title	Rationale	Indicative Quarter
Healthy Organisation				
Corporate Governance The audits surrounding Governance will focus on the Healthy Organisation update, including a cross SWAP audit looking at how culture and behaviours are managed. There will be fuller reviews of key areas of potential risk to test the operation of the framework. These will include Area Board Grants; Gifts and hospitalities; Complaints; and the LEP.	An innovative and effective Council	Officers Declarations of Interests, Gifts and Hospitality	Ensuring high level of ethical standards, public confidence and preventing potential fraud has always been a key focus for local government. This audit will review the effectiveness of Wiltshire's arrangements and controls to provide assurance that the Council's policy, procedures and guidance are operating effectively across the Council, as well as are in line with comparative organisations.	2
	An innovative and effective Council	Healthy Organisation Update	A full Healthy Organisation review was carried out in 2015/16 with follow up work in 2016/17 on progressing actions. This review will provide an update of the latest position and revisit some of the themes to ensure the scoring remains appropriate. The audit will add further value by making appropriate comparison with other SWAP partner organisations and inform audit plan changes in 2017/18, the risk assessment to inform the 2018/19 Audit Plan and the Annual Governance Statement for 2017/18.	3
	Stronger Communities	Area Boards	Area Boards are community focussed including delivery of local priorities and working with local people. The budget for 2017/18 is £1.75m devolved to 18 Area Boards. This audit will review the control over grant awards, control of budgets and the achievement of objectives.	2
	An innovative and effective Council	Corporate Complaints	A robust corporate complaints process and policy ensures the Council has a consistent approach to the treatment of complaints and ensure all are treated seriously and sympathetically resolved in a timely manner. This audit will seek to provide assurance and deep dive into planning, an area considered to be high risk if complaints are not treated effectively to assess the effectiveness and identify any opportunity for continuous improvement.	2



a	An innovative and effective Council	Council's Culture and Ethics	SWAP are carrying out a cross cutting review at all of its partners/clients to assess areas for learning and improvement in cultural and ethical controls and behaviours frameworks. The first stage will include a common questionnaire to focus on areas of best practice and opportunities for learning from others. This audit will provide assurance and provide confidence over a strong commitment being translated into everyday behaviours. The scope will include the relationship with the new Business Plan of the Council.	3
	Growing the Economy	Swindon and Wiltshire Local Enterprise Partnership (LEP)	As the Accountable Body for the LEP Wiltshire Council need to ensure sound financial controls are operating that ensure financial accuracy and safeguard public funds. These controls should safe guard not only the public purse but also the reputation of the scheme. Over the last year there have been a number of national concerns raised over these funds, and whilst no questions have been raised over Wiltshire's arrangements and indeed earlier audits have found good controls this audit will maintain a focus and watching brief to ensure and provide assurances this situation is maintained. The audit will review the governance framework operating for the LEP to provide assurance and recommend areas for improvement and/or value for money to the Council as well as assure DCLG of the standard of the Partnership operations.	2



Commissioning & Procurement The audits will focus on the overall framework and have a deeper dive into two areas of the business that incur large expenditure: Domiciliary Care; Highways; and Passenger Transport to test the controls and framework in detail.	An innovative and effective Council	Contract Management Framework	Contracted services represent a high area of expenditure for the Council. A revised Contract Management Framework was being developed by the Council during 2016/17. This audit will review the effectiveness of the framework at the operational phase in terms of strategy, structures/resources, development and delivery. The audit will also test the process for award, taking a sample of recently awarded contracts. To provide assurance and identify recommendations for any improvements, comparison will be made where applicable to best practice in the public sector and with SWAP partners.	2
	An innovative and effective Council	Highways Maintenance Contract	The value of the Highways Maintenance Contract is approximately £15m per annum and was last awarded in 2016 for a five-year period. This audit will review the contract management arrangements to provide assurance that it is managed appropriately, so that deliverables required are received and payments being made are in accordance with contract conditions.	2
	An innovative and effective Council	Passenger Transport	The total budget for passenger transport is £24m per annum and generally a area of high risk from fraud and abuse to local authorities. This audit will test payments and authorisations to provide assurance or recommend areas for improvement or greater value for money opportunities that enable effective commissioning, contract management, payments and management information are operating in respect of client transport.	2



	An innovative and effective Council	ICT Traded Services with Wiltshire Police	To review arrangements for the client monitoring of the contract.	2
Financial Management These audits will review the overall effectiveness of the financial governance in place to ensure sound payments, receipting and contracts are	An innovative and effective Council	Financial and Contract Regulations Compliance	Financial Regulations are a key part in ensuring financial controls operate across the Council and the use of resources. They were updated during 2016/17, apply to both Members and employees and a key part of the effective financial governance of the Council. This audit will examine the level of compliance, awareness and how embedded in the financial governance of the Council.	3
made. There will be detailed testing, supported by fraud tests set out in the	Protecting those who are most vulnerable	Better Care Fund	To review effectiveness of governance arrangements including financial management and performance management arrangements to ensure the BCF meets it objectives in the medium term.	4
Fraud Plan, in the following areas to then test the application of those rules to ensure	Protecting those who are most vulnerable	Special Educational Needs	To review the robustness of controls over the assessment and funding of special educational needs including eligibility and accuracy of payments.	2
 there is awareness and compliance: Better Care Fund; Special Educational Needs; and Corporate Debt recovery Use of Consultants and IR35 	An innovative and effective Council	Corporate Debt Recovery	A new Debt Recovery Strategy was introduced in late 2016/17. This audit will review the compliance and effectiveness of the strategy together with the process and consider any actions for effective and economic recovery.	3



	An innovative and effective Council	Use of Consultants and IR35	The use of consultants is a significant area of expenditure for the Council. This audit will review the process for the procurement ensuring effectively controlled and achieves value for money. It will further review the Council's response to IR 35 effective from April 2017, to ensure effective in identifying workers provided through intermediaries and that appropriate PAYE and NI is deducted. The risk is that if in scope and the Council does not deduct it could be liable itself for the deductions plus substantial financial penalties. The review of the response will be carried out across all SWAP partners and bets practice will be shared where appropriate.	1
Programme & Project Management This audit will review the Council's framework and test the application of those procedures by reviewing how a sample of key projects are being managed; and how the Council is building in benefits realisation into its model.	An innovative and effective Council	Project Management Framework	An effective project management framework is essential to control the delivery of the Council's projects for service improvement and transformation. The risks are non- delivery of project aims as defined at project initiation stage and poor use of limited resources to support delivery. This audit will compare the framework against international standards to assess the effectiveness of how Wiltshire are applying standard tools and techniques to ensure risks are mitigated and success factors achieved. The audit will also include the assessment fo projevct outcomes and realisation of benefits.l	2



Performance Management The Healthy Organisation framework identified this as an area of strong performance and as such this audit will review the framework only for any changes in risks.	An innovative and effective Council	Performance Management Framework	Review the Council's performance management framework to ensure fit for purposes. This will include a review data quality for a number of key performance indicators to ensure performance reporting is based on accurate information allowed robust accountability and decision making.	3
People & Asset Management This area was rated as strong at the last	An innovative and effective Council	Maintenance of Council Property	The Council has a significant property portfolio with high maintenance costs. This audit will review the effectiveness of control over the maintenance to ensure value for money is achieved.	4
Healthy Organisational review. In 2017/18 the audit focus will thus be on areas identified by senior leaders for testing.	Protecting those who are most vulnerable	Housing Needs	This audit will review the Council's process for assessing housing needs and investigating homelessness to ensuring entitlement to housing or temporary accommodation. This audit has also been requested by the responsible Associate Director.	3



Information Management This was an area identified in the Healthy Organisation review 2016/17 and other independent external reviews as needing strengthening. Allot of work has been done in the last 12 months and our audit work will focus on testing the new controls introduced as well as areas of known high potential risk from that HO review and the experiences of other public and private sector bodies.	An innovative and effective Council	Data Sharing Protocols with Partners	The Council is increasingly working in partnership with other organisations and as such sharing data that brings with it with significant risks in terms of data quality, controlling and data protection. This audit will review the data being shared and effectiveness of protocols operating.	4
	An innovative and effective Council	Cyber Security	Cyber security represents a major risk to organisations from unauthorised access to for example networks and data. Recent examples of ransomware have highlighted the very real risk to Council. This audit will review the effectiveness of arrangements and controls operating to secure the Council and ensure operation of its services.	2
	An innovative and effective Council	Cloud Computing	In common with many organisations, the Council's strategy is to move key applications to being cloud based. Although significant benefits to the Council, it also has additional risks over the security provided by the provider and the effectiveness of controls. This audit will review the effectiveness of these cloud specific related issues and level of governance.	4
	An innovative and effective Council	ICT Asset Management	ICT hardware and software represents a significant asset to the Council and critical to its operation. This audit will review the effectiveness of controls operating.	1
	An innovative and effective Council	Network Management	The security and operation of the Council's IT network is critical to its operation and this audit will review the effectiveness of controls and practices operating including compliance with policies and regulations.	4



	An innovative and effective Council	General Data Protection Regulations (GDPR) Readiness	The GDPR are due to go live in May 2018 and changes to the requirements around processing of data, data sharing, burden of proof, children's data, reporting and increased fines for noncompliance of up to 20m Euros represent significant risks to the Council. This audit will review the Council's understanding and readiness for compliance and identify any gaps.	1
	An innovative and effective Council	Mobile Computing/Devise Management	There has been an increasing use of mobile computing over recent years that brings additional risks over the access and security of data. This audit will review the effectiveness of controls operating to secure the Council's data.	3
Requested by Managem				
	Growing the Economy	European Funding	Council responsible for the oversight of expenditure with in excess of £40M of match funding over a period. Risk if arrangements not sufficiently robust then Central Government will seek recovery of funding. The audit will provide assurance over the Council's role in the oversight of expenditure including arrangements with partner organisations.	3
	An innovative and effective Council	Wiltshire History Centre	To review business operation of the centre, income contract and assets (artifacts).	2
Key Financial Systems				



An innovative and effective Council	Accounts Payable	Review of key financial system to provide assurance on effectiveness of controls and to help inform the work of the External Auditors. The audits will also include full review	3
An innovative and effective Council	Accounts Receivable	of IT application controls. Our work is not directed by the External Auditors but there	3
An innovative and effective Council	Council Tax	is an agreed protocol operating that covers key financial systems work. Internal Audit undertakes an assessment of the audit work required based on previous audit	4
An innovative and effective Council	Business Rates	coverage and any changes to the control environment.	4
An innovative and effective Council	Housing Rents		4
An innovative and effective Council	Main Accounting		4
An innovative and effective Council	Treasury Management		3
An innovative and effective Council	HR/Payroll		3
An innovative and effective Council	Pensions		4
An innovative and effective Council	Capital Accounting		3



	An innovative and effective Council	Housing and Council Tax Benefits		4
Schools				
	An innovative and effective Council	Thematic - ICT Security	Sample of schools to be visited to review effectiveness of ICT security. Common issues and recommendations to be communicated to all schools and the schools forum.	2
	An innovative and effective Council	Thematic - Banking Arrangements	Sample of schools to be visited to review effectiveness of banking arrangements. Common issues and recommendations to be communicated to all schools and the school's forum.	2
	An innovative and effective Council	Thematic - HR/Payroll	Sample of schools to be visited to review effectiveness of HR/Payroll arrangements. Common issues and recommendations to be communicated to all schools and the school's forum.	4
	An innovative and effective Council	Specific Schools (To be decided quarterly)	Twelve schools to be visited as individual reviews of the effectiveness of the governance and financial management operating for the maintained schools. The reviews will provide assurance to both Governing Bodies and the Council including compliance with the Schools' Financial Value Statement.	1-4
Follow-Up				
	An innovative and effective Council	Land Charges	Internal Audit required to follow-up audits carried out in 2016/17 where "partial" assurance has been given to	4



An innovative and effective Council	Safeguarding	ensure management actions implemented and improvements made.	3
An innovative and effective Council	Early Years Funding		2
An innovative and effective Council	Concessionary Fares		3
An innovative and effective Council	Right to Buy		4
An innovative and effective Council	Housing Repairs		3
An innovative and effective Council	Vehicle Workshops		2
An innovative and effective Council	Bishops Cannings Primary School		2
An innovative and effective Council	St Barnabas CofE Primary School		2
An innovative and effective Council	Staverton CofE Primary School		2
An innovative and effective Council	Luckington Community School		2



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	An innovative and effective Council	St Andrews CofE Primary		3
Grants				
	An innovative and effective Council	Growth Hub	BIS requirement under conditions of the grant for audit of claim submitted by appropriately qualified and independent auditor to provide assurance over the statement of grant expenditure and/or grant claim, in all material respects and in accordance with the grant offer and conditions.	4
	Protecting those who are most vulnerable	Troubled Families	DCLG requirement for audit of claims submitted reviewed a representative sample of families and achievement of outcomes.	4
	An innovative and effective Council	Local Authority Bus Subsidy	DoT requirement for audit and for the Council's Chief Internal Auditor to sign a declaration on the correct disbursement of the grant.	2
	Protecting those who are most vulnerable	Public Health Grant	To support the S151 Officer's Statement of Assurance to Department of Health over expenditure complying with the conditions.	1
Client Support				
	An innovative and effective Council	Corporate Advice	Providing professional advice as "subject experts" to services on areas such as good governance, internal control, managing risks, financial management, external best practice and use of resources. This will include proactive advice given as part of project and working groups.	1-4



An innovative and effective Council	Annual Governance Statement	To provide support to the production of the Council's Annual Governance Statement.	4
An innovative and effective Council	Audit Committee/Members Liaison	Including the preparation, attendance and follow-up actions for the Audit Committee, attendance at other committees, members liaison, support and training.	1-4
An innovative and effective Council	External Audit Liaison	Ongoing liaising with External Audit	1-4
An innovative and effective Council	Planning/Client Liaison	Internal Audit Planning, meetings and liaison with S151 Officer, other statutory officers and key clients.	1-4
An innovative and effective Council	CLT Attendance	Preparation and attendance at CLT as required.	1-4
An innovative and effective Council	Follow Up Contingency	Follow-up of finalised audits to ensure agreed actions to audit recommendations made are implemented.	1-4



The Internal Audit Charter

Purpose

The purpose of this Charter is to set out the nature, role, responsibility, status and authority of internal auditing within Wiltshire Council, and to outline the scope of internal audit work.

Approval

This Charter is reviewed each year to confirm it remains accurate and up to date. It was last approved by the Audit Committee on the 26th April 2016.

Provision of Internal Audit Services

The internal audit service is provided by the South West Audit Partnership Limited (SWAP). SWAP is a Local Authority controlled company. This charter should be read in conjunction with the Service Agreement, which forms part of the legal agreement between the SWAP partners.

The budget for the provision of the internal audit service is determined by the Council, in conjunction with the Members Meeting. The general financial provisions are laid down in the legal agreement, including the level of financial contribution by the Council, and may only be amended by unanimous agreement of the Members Meeting. The budget is based on an audit needs assessment that was carried out when determining the Council's level of contribution to SWAP. This is reviewed each year by the Associate Director Finance (S151 Officer) in consultation with the Chief Executive of SWAP.

Role of Internal Audit

The Accounts and Audit (England) Regulations 2015, state that: "A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account the public sector internal auditing standards or guidance."

Internal audit is an independent, objective assurance and consulting activity designed to add value and improve the Council's operations. It helps the Council accomplish its objectives by bringing a systematic disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

Responsibilities of Management and of Internal Audit

Management¹

Management is responsible for determining the scope, except where specified by statute, of internal audit work and for deciding the action to be taken on the outcome of, or findings from, their work. Management is responsible for ensuring SWAP has:

- the support of management and the Council; and
- direct access and freedom to report to senior management, including the Council's Corporate Directors, Leader and the Audit Committee.

Management is responsible for maintaining internal controls, including proper accounting records and other management information suitable for running the Authority. Management is also responsible for the appropriate and effective management of risk.

Internal Audit

Internal audit is responsible for operating under the policies established by management in line with best practice.

Internal audit is responsible for conducting its work in accordance with the Code of Ethics and Standards for the Professional Practice of Internal Auditing as set by the Institute of Internal Auditors and further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS); SWAP has been independently assessed and found to be in conformance with the Standards.

¹ In this instance Management refers to the Corporate Leadership Team

Internal audit is not responsible for any of the activities which it audits. SWAP staff will not assume responsibility for the design, installation, operation or control of any procedures. SWAP staff who have previously worked for the Council will not review any aspects of their previous department's work until one year has passed since they left that area.

Relationship with the External Auditors/Other Regulatory Bodies

Internal Audit will co-ordinate its work with others wherever this is beneficial to the organisation.

Status of Internal Audit in the Organisation

The Chief Executive of SWAP is responsible to the SWAP Board of Directors and the Members Meeting. The Chief Executive and Assistant Director of SWAP also report to the Associate Director Finance (S151 Officer) and to the Audit Committee as set out below.

Appointment or removal of the Chief Executive of SWAP is the sole responsibility of the Members Meeting.

Scope and authority of Internal Audit work

There are no restrictions placed upon the scope of internal audit's work. SWAP staff engaged on internal audit work are entitled to receive and have access to whatever information or explanations they consider necessary to fulfil their responsibilities to senior management. In this regard, internal audit may have access to any records, personnel or physical property of Wiltshire Council.

Internal audit work will normally include, but is not restricted to:

- reviewing the reliability and integrity of financial and operating information and the means used to identify, measure, classify and report such information;
- evaluating and appraising the risks associated with areas under review and make proposals for improving the management of risks;
- appraise the effectiveness and reliability of the enterprise risk management framework and recommend improvements where necessary;
- assist management and Members to identify risks and controls with regard to the objectives of the Council and its services;
- reviewing the systems established by management to ensure compliance with those policies, plans, procedures, laws and regulations which could have a significant impact on operations and reports, and determining whether Wiltshire Council is in compliance;
- reviewing the means of safeguarding assets and, as appropriate, verifying the existence of assets;
- appraising the economy, efficiency and effectiveness with which resources are employed;
- reviewing operations or programmes to ascertain whether results are consistent with established objectives and goals and whether the operations or programmes are being carried out as planned.
- reviewing the operations of the Council in support of its Anti-fraud and Corruption Policy.
- at the specific request of management, internal audit may provide consultancy services provided:
 - the internal auditor's independence is not compromised
 - the internal audit service has the necessary skills to carry out the assignment, or can obtain such skills without undue cost or delay
 - the scope of the consultancy assignment is clearly defined and management have made proper provision for resources within the annual audit plan
 - > management understand that the work being undertaken is not internal audit work.

Planning and Reporting

SWAP will submit to the Audit Committee, for approval, an annual internal audit plan, setting out the recommended scope of their work in the period.

The annual plan will be developed with reference to the risks the organisation will be facing in the forthcoming year, whilst providing a balance of current and on-going risks, reviewed on a cyclical basis. The plan will be reviewed on a quarterly basis to ensure it remains adequately resourced, current and addresses new and emerging risks.

SWAP will carry out the work as agreed, report the outcome and findings, and will make recommendations on the action to be taken as a result to the appropriate manager and Associate Director. SWAP will report at least four times a year to the Audit Committee. SWAP will also report a summary of their findings, including any persistent and outstanding issues, to the Audit Committee on a regular basis.

Internal audit reports will normally be by means of a brief presentation to the relevant manager accompanied by a detailed report in writing. The detailed report will be copied to the relevant line management, who will already have been made fully aware of the detail and whose co-operation in preparing the summary report will have been sought. The detailed report may also be copied to the Associate Director Finance (S151 Officer) and to other relevant line management.

The Chief Executive of SWAP will submit an annual report to the Audit Committee providing an overall opinion of the status of risk and internal control within the Council, based on the internal audit work conducted during the previous year.

In addition to the reporting lines outlined above, the Chief Executive, Directors and the Assistant Director of SWAP, have the unreserved right to report directly to the Leader of the Council, the Chairman of the Audit Committee, the Council's Corporate Directors or the External Audit Manager.

April 2017