**ITEM 13** 

#### NORTH YORKSHIRE COUNTY COUNCIL

#### AUDIT COMMITTEE

#### 7 MARCH 2019

#### PROGRESS ON 2018/19 INTERNAL AUDIT PLAN

#### Report of the Head of Internal Audit

#### 1.0 PURPOSE OF THE REPORT

1.1 To inform Members of the progress made to date in delivering the 2018/19 Internal Audit Plan and any developments likely to impact on the Plan throughout the remainder of the financial year.

#### 2.0 BACKGROUND

- 2.1 Members approved the 2018/19 Audit Plan on the 21 June 2018. The total number of planned audit days for 2018/19 is 1,100 (plus 956 days for other work including counter fraud and information governance). The performance target for Veritau is to deliver 93% of the agreed Audit Plan.
- 2.2 This report provides details of how work on the 2018/19 Audit Plan is progressing.

#### 3.0 INTERNAL AUDIT PLAN PROGRESS BY 31 JANUARY 2019

- 3.1 The internal audit performance targets for 2018/19 were set by the County Council's client officer. Progress against these performance targets, as at 31 January 2019, is detailed in **Appendix 1**.
- Work is ongoing to complete the agreed programme of work. It is anticipated that the 93% target for the year will be exceeded by the end of April 2019 (the cut off point for 2018/19 audits). **Appendix 2** provides details of the final reports issued in the period. A further 7 audit reports have been issued but remain in draft. Fieldwork is currently underway with a number of other scheduled audits.

### **Contingency and Counter Fraud Work**

3.3 Veritau continues to handle cases of suspected fraud or malpractice. Such assignments are carried out in response to issues raised by staff or members of the public via the Whistleblower Hotline, or as a result of management raising concerns. Since the start of the current financial year, 44 cases of suspected fraud or malpractice have been referred to Veritau for investigation. 15 of these are internal fraud cases, 21 relate to social care and 8 relate to external fraud, debt recovery, or abuse of the council's financial assistance scheme. A further 13 cases relate to applications for a school place. A number of these investigations are still ongoing.

#### **Information Governance**

- 3.4 Veritau's Information Governance Team (IGT) continues to handle a significant number of information requests submitted under the Freedom of Information and Data Protection Acts. The number of FOI requests received between 1 April 2018 and 31 January 2019 is 967 compared with 1,027 requests received during the corresponding period in 2017/18. The County Council is currently below the performance response target of 95% for 2018/19 with approximately 83% of requests so far being answered within the statutory 20 day deadline. An action plan has been discussed at Management Board to improve performance in this area. The IGT also coordinates the County Council's subject access requests (SARs) and has received 328 such requests between 1 April 2018 and 31 January 2019 compared to 162 requests received during the corresponding period in 2017/18.
- 3.5 Veritau acts as the County Council's Data Protection Officer following the implementation of the General Data Protection Regulation (GDPR) on 25 May 2018. The IGT has been assisting the County Council to update the information governance policy framework in line with the requirements of GDPR and the new Data Protection Act 2018. Other work has included preparing data sharing agreements, recording data security incidents, investigating serious data security incidents, and providing advice and support to service departments. Veritau auditors have also continued to undertake a programme of unannounced compliance visits to County Council premises in order to assess staff awareness of the need to secure personal and sensitive information.

#### Variations to the 2018/19 Audit Plan

3.6 All proposed variations to the agreed Audit Plan arising as the result of emerging issues and/or requests from directorates are subject to a Change Control process. Where the variation exceeds 5 days then the change must be authorised by the client officer. Any significant variations will then be communicated to the Audit Committee for information. The following variations have been authorised since the last progress report. The variations follow discussions with management and reflect changes in current priorities:

Review of T21 payment process +20 days
Reduction in allocation for Financial Processors (15 days) -8 days
Contingency (12 days) -12 days

Net change to plan nil

#### **Follow Up of Agreed Actions**

3.7 Veritau follows up all agreed actions on a regular basis, taking account of the timescales previously agreed with management for implementation. An escalation process is in place for when agreed actions are not implemented or where management fail to provide adequate information to enable an assessment to be made. At this stage in the year, there are no actions which have needed to be escalated. On the basis of the follow up work undertaken during the year to date, the Head of Internal Audit is satisfied with the progress that has been made by

management to implement previously agreed actions necessary to address identified control weaknesses.

#### **External Assessment**

- 3.8 In order to comply with the Public Sector Internal Audit Standards (PSIAS), internal auditors working in local government are required to maintain a quality assurance and improvement programme (QAIP). As part of this programme, providers are required to have an external assessment of their working practices at least once every five years.
- 3.9 An external assessment of Veritau's internal audit working practices was undertaken in November 2018 by the South West Audit Partnership (SWAP). SWAP is a not for profit council owned company operating primarily in the South West of England. As a large shared service internal audit provider it has the relevant knowledge and expertise to undertake external inspections of other shared services and is independent of Veritau. A copy their external assessment report is attached as appendix 3.
- The report concludes that Veritau internal audit activity generally conforms to the PSIAS<sup>1</sup> and, overall, the findings were very positive. The feedback included comments that the internal audit service was highly valued by its member councils and other clients, and that services had continued to improve since the last external assessment in April 2014. However, the report does include some areas for further development. These areas, and initial draft proposed actions, are summarised in appendix 4.

#### 4.0 RECOMMENDATION

Members are asked to note:

- 4.1 the progress made in delivering the 2018/19 Internal Audit programme of work and the variations agreed by the client officer.
- 4.2 the outcome from the external assessment of internal audit and the proposed action plan.

Report prepared and presented by Max Thomas, Head of Internal Audit

Max Thomas Head of Internal Audit Veritau Limited County Hall Northallerton

14 February 2019

<sup>1</sup> PSIAS guidance suggests a scale of three ratings, 'generally conforms, 'partially conforms' and 'does not

conform'. 'Generally conforms' is the top rating.

Background Northallerton.	Documents:	Relevant	audit	reports	kept b	y Veritau	at 50	South	Parade,

# PROGRESS AGAINST 2018/19 PERFORMANCE TARGETS (AS AT 31/1/2019)

Indicator	Milestone	Position at 31/1/2019
To deliver 93% of the agreed Internal Audit Plan	93% by 30/4/19	41.86%
To achieve a positive customer satisfaction rating of 95%	95% by 31/3/19	100%
To ensure 95% of Priority 1 recommendations made are agreed	95% by 31/3/19	100%
To ensure at least 30% of investigations completed result in a positive outcome (management action, sanction or prosecution)	30% by 31/3/19	54.17%
To identify actual fraud savings of £50k (quantifiable savings)	£50k by 31/3/19	£72,438
To ensure 95% of FOI requests are answered within the Statutory deadline of 20 working days	95% by 31/3/19	83.04%

## FINAL 2018/19 AUDIT REPORTS ISSUED TO DATE

Audit Area	Directorate	Overall Opinion
Information security compliance – Jesmond House	Corporate	Substantial assurance
Information security compliance – North Yorkshire House	Corporate	Limited assurance
Risk management	Corporate	Substantial assurance
Transparency	Corporate	High assurance
Financial safeguarding procedures	HAS	No opinion
Deprivation of assets	HAS	Substantial assurance
Visits to Care Providers - Mencap (Scarborough)	HAS	No opinion
Visits to Care Providers - Avalon (Scarborough)	HAS	Substantial assurance
Visits to Care Providers - Botton Village – CVT	HAS	Substantial assurance
Visits to Care Providers – Eldercare	HAS	Substantial assurance
Visits to Care Providers – Foresight	HAS	Reasonable assurance
Visits to Care Providers - Botton Village - Avalon Shared Lives	HAS	Substantial assurance
Street lighting	BES	Substantial assurance
Statement of accounts – closedown	CS	High assurance
Developing Stronger Families April/May claim	CYPS	No opinion
Developing Stronger Families September claim	CYPS	No opinion
Developing Stronger Families December claim	CYPS	No opinion
Responsive works	Procurement	No opinion

## **FINAL REPORT**



# SELF-ASSESSMENT WITH EXTERNAL INDEPENDENT VALIDATION

**VERITAU GROUP** 

**NOVEMBER 2018** 

# COMPLETED BY: SWAP INTERNAL AUDIT SERVICES





#### INTRODUCTION

In accordance with the International Standards for the Professional Practice of Internal Auditing "The chief audit executive must develop and maintain a quality assurance and improvement programme that covers all aspects of the internal audit activity" (*Performance Standard 1300*). In order to achieve this, the Head of Internal Audit Partnership commissioned a Quality Review of Veritau.

There are two suggested approaches to conducting the review:

- External Quality Assessment
- Self-Assessment with Independent Validation

Due to the prohibitive costs of an External Quality Assessment, recognised as achieving the highest level of quality assurance, Veritau opted for the second option, with independent validation being carried out through peer review. For the process to pass the 'independence' test the Manual recommends that "at least three organisations come together to form a pool of professionals, all of whom are qualified to conduct external assessments".

In order to achieve this Veritau worked together with the South West Audit Partnership (SWAP), the Devon Audit Partnership (DAP) and Hertfordshire's Shared Internal Audit Service (SIAS), whereby each Audit Team would carry out a self-assessment and then SWAP would act as Validators for Veritau, Veritau for SIAS, SIAS for DAP and DAP for SWAP.

#### SCOPE AND METHODOLOGY

As part of the preparation for the Quality Assurance Review (QAR), Veritau prepared a self-assessment document (utilising the Checklist for Assessing Conformance with the Public Sector Internal Auditing Standards (PSIAS) and the Local Government Application Note (LGAN)), providing links to necessary evidence to support their findings. The self-assessment team conducted a QAR of the internal audit (IA) activity undertaken by Veritau across its client organisations in preparation for validation by an independent assessor. The team also reviewed the IA activity's risk assessment and audit planning processes, audit tools and methodologies, engagement and staff management processes as well as the service Procedure Manuals for the delivery of Internal Audit reviews.

The principal objective of the QAR was to assess the IA activity's conformance to the International Standards for the Professional Practice of Internal Auditing (Standards), incorporating the PSIAS and LGAN.

The QAR Team from SWAP was made up of their Company Chief Executive – Gerry Cox who is a Chartered Auditor and Certified Auditor with c.30 years management experience in Internal Auditing. The second member of the team was SWAP's Director of Quality - Ian Baker, a Chartered Auditor and Fellow Member of the Institute of Management Services with over 15 years management experience in Internal Auditing.



In addition to reviewing the evidence supplied by the Self-Assessment Team the Review Team were on site for three days meeting with Veritau staff, client officers and Committee Members. In addition to interviewing the Head of Internal Audit and his Deputy a further twenty-two interviews were held, with eighteen of these representing client organisations and the other five being staff members.

#### **OPINION AS TO CONFORMITY TO THE STANDARDS**

It is our overall opinion that the Veritau IA activity 'Generally Conforms' to the *Standards* and Code of Ethics.

For a detailed list of conformances to individual standards, please see Attachment A. The Self-Assessment and QAR team identified opportunities for further improvement, details of which are provided in this report.

The IIA's *Quality Assessment Manual for the Internal Audit Activity* suggests a scale of three rankings when opining on the internal audit activity:

- "Generally Conforms," "Partially Conforms," and "Does Not Conform." The ranking of "Generally Conforms" means that an internal audit activity has a charter, policies, and processes that are judged to be in conformance with the Standards and the Code of Ethics.
- "Partially Conforms" means that deficiencies in practice are noted that are judged to deviate from the Standards and the Code of Ethics; however, these deficiencies did not preclude the internal audit activity from performing its responsibilities in an acceptable manner.
- "Does Not Conform" means that deficiencies in practice are judged to deviate from the Standards and the Code of Ethics, and are significant enough to seriously impair or preclude the internal audit activity from performing adequately in all or in significant areas of its responsibilities.

A detailed description of conformance criteria can be found at the end of Appendix B.

#### SUMMARY OF POSITIVE OBSERVATIONS

It is our view that the IA activity environment provided by Veritau is well-structured and continues in its progression. The Standards are clearly understood, and management is taking a number of initiatives to ensure the service continues to provide added value to its clients. The vast majority of those interviewed spoke about the significant improvements they have seen in the service provided over recent years; providing evidence that the service is staying 'relevant' in ever changing times. A key contributor to this is that the Head of Internal Audit continues to be highly valued and respected by both client officers and staff; the Audit Managers and staff are also clearly valued with clients mentioning how quickly junior members of the IA team are brought up to speed.



To demonstrate how the service is viewed we have captured a flavour of some of the comments made to us:

- Very professional..... the Head of IA is exceptional" s.151 Officer
- "I have a good relationship with the Audit Manager, interaction is good, and we have an open door" Audit Committee Chair
- "They tell me what I need to hear, not what I want to hear" s.151 Officer
- The Head of IA is the personification of professionalism" s.151 Officer
- (Their reports are valuable, never trivia and never lacking in substance" Audit Committee Chair

#### Other positive observations include:

- The Head of Internal Audit is highly respected by both staff and client representatives.
- We received exceptionally positive feedback about Audit Managers and staff working on audits.
- Feedback indicates that the service is trusted and maintains a good organisational profile.
- We asked each of the eighteen client representatives to rate the internal audit service provided by Veritau, out of 10. The service received an average score of 8.2 which indicates it is highly valued by its clients.
- Veritau offer good internal training and development for new auditors.
- We identified in the last QAR that IT audit in Annual Plans was low. This has been addressed and Veritau have a pragmatic approach for developing and maintaining skills in this area of expertise.
- Other issues raised in the last QAR have been addressed.

Consequently, the observations and recommendations by the QAR Team captured below are intended to build on the foundations already in place in the IA activity.

#### **OBSERVATIONS AND RECOMMENDATIONS**

#### PART I – MATTERS FOR CONSIDERATION OF VERITAU MANAGEMENT

1. The IA Charter states that "The Head of Internal Audit will informally meet in private with members of the Audit and Governance Committee, or the committee as a whole as required. Meetings may be requested by committee members or the HoIA."

Guidance from the IIA recommends that the Audit Committee (Board) "Meets with the Head of Internal Audit at least once a year without the presence of management." This does not happen as a matter of course with all clients of Veritau, however, the Charter allows this to happen and all Chairs of Audit Committees feel that if they wanted such a meeting, it would happen. Some teams have taken a 'purest' approach and hold at least one meeting a year with the Audit Committee or Chair without management being present. The HolA audit should consider if Veritau should adopt a similar approach or be satisfied that such meeting



will take place should it become necessary to do so. (Attribute Standard 1111).

- 2. The self-assessment identified that Council CEO's or Audit Committee Chairmen do not contribute to the performance appraisal of the HolA. The responsibility for this rests with the Board of Directors, many of whom are Section 151 Officers for the representative Councils. In addition, reliance is placed on Customer Satisfaction results. To ensure that this is reflective of the key clients, the Chairman of the Board may want to consider the introduction of a 360-degree feedback process when assessing the HolA's performance. (Attribute Standard 1100).
- 3. While the annual planning process is well documented, the self-assessment acknowledged that each piece of audit work is not prioritised. Doing so assists when decisions need to be taken on bringing in new pieces of work due to new and emerging risks. Consideration should be given to priority ranking audit work. (LGAN requirement).
- 4. Whilst reliance may be placed on other sources of assurance, the self-assessment brought attention to the fact that there has not been an assurance mapping exercise to determine the approach to using other sources of assurance. Completion of such an exercise would ensure that work is coordinated with other assurance bodies and limited resources are not duplicating effort. (Attribute Standard 2050).
- 5. It is clear that the actions from the last review have been completed, however, the resulting Quality Assessment Improvement Programme (QAIP) should remain a live document to demonstrate continuous improvement. While the process of the QAIP is reported to the Audit Committee annually, the report does not outline the detailed actions with SMART targets for completion. (Attribute Standard 1320).

The following two matters are not related necessarily to Conformance with the Standards but are matters we picked up during our three-day visit that should be on the radar of the Veritau Board and be highlighted as part of the Company's risk exposure:

- SUCCESSION PLANNING there is no doubt that the HolA is highly respected and valued by clients. Whilst other audit managers are respected as well, it became clear to us that a lot of emphasis was placed on the existing HolA, with one client asking, "what will happen post Max". Clearly this could be a matter for serious concern, having all eggs in one basket, so to speak. The Veritau Board should satisfy themselves that there is a clear succession plan in place in the event of the current HolA not being available to the Company for any reason.
- STAFF RETENTION a number of clients raised concerns around the retention of staff. They were, as reflected in our discussions, very complimentary about the quality of the more junior staff being introduced to the Company, which is a credit to IA Managers and their induction of these individuals. However, it should be recognised that whilst some good initiatives have been taken in the recruitment and development of these staff, for example in the area of IT Audit, in a highly competitive market for Internal Auditors, and in particular those with specialist skills, the Company may become a 'nursery' for other providers paying higher salaries for experienced audit staff. The Veritau Board should consider whether their retention policies are robust and that the organisation structure allows sufficient progression to occur in order to retain staff as their experience and knowledge grows.



#### PART II – ISSUES SPECIFIC TO THE INTERNAL AUDIT ACTIVITY OF VERITAU

- 1. As identified earlier, the service provided by Veritau is highly rated (8.2 out of 10). Of course, we know with any service there will be results above or below this perception and it is the same for some audit reviews. For those who said why such reviews would be considered for a lower score, feedback generally related to reporting, as follows:
  - Audit assessments could be more robust or more forceful. This came from a number of individuals who felt that sometimes the reporting may 'placate' the service too much. There is a difficult balance to find between not alienating people from the audit process, but robustly 'telling it as it is'.
  - Closely aligned to this was the some felt reports could do with more 'context' rather than just straight in to the findings.
  - Finally, one minor 'irritation' was when auditors report "we have found", when often it is the service that brought this to their attention.
- 2. All the staff interviewed were very happy with their role within the Company. We did, however, agree to feedback any points raised during these interviews for suggested improvement; some of which may already be on management's radar and recognising that in each suggestion there is a balance to be reached:
  - Ensure the Auditor who completed the review completes the follow up. The individual who raised this was doing so from an efficiency point of view.
  - Allow more time to learn about the clients and become more organisationally aware.
  - Better sharing of findings and information across clients.

#### **RECOMMENDATIONS**

#### We recommend that:

- the Head of Internal Audit presents this report to the Veritau Board and each of its client organisations Audit Committees;
- the Head of Internal Audit incorporates the Observations and Recommendations from this report into the Quality Assessment Improvement Programme (QAIP) and that the QAIP is maintained as a live document;
- the Head of Internal Audit presents the QAIP to the Veritau Board and each of its client organisations Audit Committees and thereafter reported periodically to monitor progress and to demonstrate the continuous improvement of the service.



# ATTACHMENT A STANDARDS CONFORMANCE EVALUATION SUMMARY

### **SWAP INTERNAL AUDIT SERVICES**

Standards Conformance Evaluation Summary		("X" Evaluator's Decision)		
		GC	PC	DNC
OVER/	ALL EVALUATION			
ATTRII	BUTE STANDARDS			
Defini	tion of Internal Auditing	Х		
IIA Co	de of Ethics	Х		
1000	Purpose, Authority, and Responsibility	Х		
1100	Independence and Objectivity	Х		
1110	Organisational Independence	Х		
1111	Direct Interaction with the Board	Х		
1120	Individual Objectivity	Х		
1130	Impairments to Independence or Objectivity	Х		
1200	Proficiency and Due Professional Care			
1210	Proficiency	Х		
1220	Due Professional Care	Х		
1230	Continuing Professional Development	Х		
1300	Quality Assurance and Improvement Program			
1310	Requirements of the Quality Assurance and Improvement Program	Х		
1311	Internal Assessments	Х		
1312	External Assessments	Х		
1320	Reporting on the Quality Assurance and Improvement	Х		
1321	Use of "Conforms with the International Standards for the Professional Practice of Internal Auditing"	Х		
1322	Disclosure of Non-conformance	Х		
PERFO	RMANCE STANDARDS			
2000	Managing the Internal Audit Activity			
2010	Planning	Х		
2020	Communication and Approval	Х		
2030	Resource Management	Х		
2040	Policies and Procedures	Х		



Standards Conformance Evaluation Summary		("X" Evaluator's Decision)		
		GC	PC	DNC
2050	Coordination		Х	
2060	Reporting to Senior Management and the Board	Х		
2100	Nature of Work			
2110	Governance	Х		
2120	Risk Management	Х		
2130	Control	Х		
2200	Engagement Planning			
2201	Planning Considerations	Х		
2210	Engagement Objectives	Х		
2220	Engagement Scope	Х		
2230	Engagement Resource Allocation	Х		
2240	Engagement Work Program	Х		
2300	Performing the Engagement			
2310	Identifying Information	Х		
2320	Analysis and Evaluation	Х		
2330	Documenting Information	Х		
2340	Engagement Supervision	Х		
2400	Communicating Results			
2410	Criteria for Communicating	Х		
2420	Quality of Communications	Х		
2421	Errors and Omissions	Х		
2430	Use of "Conducted in conformance with the <i>International</i> Standards for the Professional Practice of Internal Auditing"	Х		
2431	Engagement Disclosure of Non-conformance	Х		
2440	Disseminating Results	Х		
2500	Monitoring Progress	Х		
2600	Communicating the Acceptance of Risks	Х		
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#### **Definitions**

**GC** – "Generally Conforms" means that the assessor or the assessment team has concluded that the relevant structures, policies, and procedures of the activity, as well as the processes by which they are applied, comply with the requirements of the individual standard or elements of the Code of Ethics in all material respects. For the sections and major categories, this means that there is general conformity to a majority of the individual standard or element of the Code of Ethics and at least partial conformity to the others within the section/category. There may be significant opportunities for improvement, but these should not represent situations where the activity has not implemented the *Standards* or the Code of Ethics and has not applied them effectively or has not achieved their stated objectives. As indicated above, general conformance does not require complete or perfect conformance, the ideal situation, or successful practice, etc.

**PC** – "Partially Conforms" means that the assessor or assessment team has concluded that the activity is making good-faith efforts to comply with the requirements of the individual standard or elements of the Code of Ethics, or a section or major category, but falls short of achieving some major objectives. These will usually represent significant opportunities for improvement in effectively applying the *Standards* or the Code of Ethics and/or achieving their objectives. Some deficiencies may be beyond the control of the internal audit activity and may result in recommendations to senior management or the board of the organisation.

**DNC** – "Does Not Conform" means that the assessor or assessment team has concluded that the internal audit activity is not aware of, is not making good-faith efforts to comply with, or is failing to achieve many or all of the objectives of the individual standard or element of the Code of Ethics, or a section or major category. These deficiencies will usually have a significantly negative impact on the internal audit activity's effectiveness and its potential to add value to the organisation. These may also represent significant opportunities for improvement, including actions by senior management or the board.



# ATTACHMENT B INDEPENDENT VALIDATOR STATEMENT

The validator was engaged to conduct an independent validation of the Veritau self-assessment. The primary objective of the validation was to verify the assertions made by the self-assessment team concerning adequate fulfilment of the organisation's basic expectations of the IA activity and its conformity to the International Standards for the Professional Practice of Internal Auditing (Standards) with reference to the Public Sector Internal Auditing Standards (PSIAS) and incorporating the Local Government Application Notes (LGAN).

In acting as validator, I am fully independent of the organisation and have the necessary knowledge and skills to undertake this engagement. The validation started on 12<sup>th</sup> October 2018 and culminated with a three-day site visit between the 5<sup>th</sup> and 7<sup>th</sup> November 2018. The validation consisted primarily of a review and testing of the procedures and results of the self-assessment. In addition, interviews were conducted with twenty-four individuals, including the Head of Internal Audit and his Deputy. These individuals are considered key stakeholders and included Audit Committee Chairs, Chief Executives, Section 151 Officers, Senior Service Managers and Veritau staff at various levels in the Company.

I concur fully with the IA activity's conclusions in the self-assessment from where some of the observations were identified.

Consideration of the matters raised, and implementation of the recommendations contained in this report will serve only to improve the effectiveness and enhance the value of the IA activity, which is already highly regarded, and ensure its full conformity to the *Standards*.

Gerry Co	ox CMIIA
Chief Ex	ecutive – SWAP Internal Audit Services
Date	26 <sup>th</sup> November 2018

Assessors Recommendation	Proposed Action	Responsibility	Action By
Guidance from the IIA recommends that the Audit Committee (Board) "Meets with the Head of Internal Audit at least once a year without the presence of management." This does not happen as a matter of course with all clients of Veritau, however, the Charter allows this to happen and all Chairs of Audit Committees feel that if they wanted such a meeting, it would happen. Some teams have taken a 'purest' approach and hold at least one meeting a year with the Audit Committee or Chair without management being present. The HolA audit should consider if Veritau should adopt a similar approach or be satisfied that such meeting will take place should it become necessary to do so. (Attribute Standard 1111).	While IIA guidance recommends this approach, there is no explicit requirement for annual meetings in the standards. And existing audit charters for each client already recognise that the Head of Internal Audit will meet with members of the relevant committee in private, as required.  No formal changes to current arrangements are proposed. Although formal annual meetings will be arranged if individual committees express a preference for this arrangement.	NA NA	NA
The self-assessment identified that Council CEO's or Audit Committee Chairmen do not contribute to the performance appraisal of the HoIA. The responsibility for this rests with the Board of Directors, many of whom are Section 151 Officers for the representative Councils. In addition, reliance is placed on Customer Satisfaction results. To ensure that this	The chairman of the Veritau board will be asked to consider whether further input from client Chief Executives and Chairs of Audit Committees (or equivalent) is needed to meet the requirements of the standards.	Veritau Chair	May 2019

Assessors Recommendation	Proposed Action	Responsibility	Action By
is reflective of the key clients, the Chairman of the Board may want to consider the introduction of a 360-degree feedback process when assessing the HolA's performance. (Attribute Standard 1100).			
While the annual planning process is well documented, the self-assessment acknowledged that each piece of audit work is not prioritised. Doing so assists when decisions need to be taken on bringing in new pieces of work due to new and emerging risks. Consideration should be given to priority ranking audit work. (LGAN requirement).	All work included in annual audit plans is considered a priority for audit in the coming year. However, it is recognised that further prioritisation may support decision making, for example where changes to audit plans are required.  As part of the development of audit plans for 2019/20, we will explore how audits included in each plan are given a priority rating.	Deputy Head of Internal Audit and Audit Managers	April 2019
Whilst reliance may be placed on other sources of assurance, the self-assessment brought attention to the fact that there has not been an assurance mapping exercise to determine the approach to using other sources of assurance. Completion of such an exercise would ensure that work is coordinated with other assurance bodies and limited resources are not duplicating effort. (Attribute Standard 2050).	A review of potential sources of assurance for each client will be undertaken during the course of 2019/20. This will be used to assess the scope for more detailed assurance mapping at each client; and to help develop a standard approach if appropriate.	Deputy Head of Internal Audit and Audit Managers	April 2020

Assessors Recommendation	Proposed Action	Responsibility	Action By
It is clear that the actions from the last review have been completed, however, the resulting Quality Assessment Improvement Programme (QAIP) should remain a live document to demonstrate continuous improvement. While the process of the QAIP is reported to the Audit Committee annually, the report does not outline the detailed actions with SMART targets for completion. (Attribute Standard 1320).	Actions included in 2018/19 annual reports will be SMART.  Progress against actions will be reported to the Veritau and VNY boards during the course of the year.	Head of Internal Audit	June 2019 (annual report)