



# East Devon District Council

## Proposed 2020-21 Internal Audit Plan and Internal Audit Charter

**Internal Audit ■ Risk ■ Special Investigations ■ Consultancy**

# The Internal Audit Plan: Summary

**The internal audit plan represents a summary of the proposed audit coverage that the internal audit team will deliver throughout the 2020/21 financial year.**

**Delivery of an internal audit programme of work that provides sufficient and appropriate coverage, will enable us to provide a well-informed and comprehensive year-end annual internal audit opinion.**

## Introduction and Objective of the Internal Audit Plan

Internal audit provides an independent and objective opinion on the Authority's risk management, governance, and control environment by evaluating its effectiveness.

Prior to the start of each financial year, SWAP, in conjunction with senior management, put together a proposed plan of audit work. The objective of our planning process and subsequent plan is to put us in a position to provide a well-informed and comprehensive annual audit opinion, based on sufficient and appropriate coverage of key business objectives, associated risks, and risk management processes.

The outcomes of each of the audits in our planned programme of work, will provide senior management and Members with assurance that the current risks faced by the Authority in these areas are adequately controlled and managed.

It should be noted that internal audit is only one source of assurance, and the outcomes of internal audit reviews should be considered alongside other sources, as part of the 'three lines' assurance model. Key findings from our internal audit work should also be considered in conjunction with completion of the Authority's AGS.

It is the responsibility of the Authority's Senior Management Team and the Audit Committee, to confirm that the audit coverage contained within the proposed audit plan is sufficient and appropriate in providing independent assurance against the key risks faced by the organisation.

When reviewing the proposed internal audit plan (as set out in Appendix 1), key questions to consider include:

- Are the areas selected for coverage this coming year appropriate?
- Does the internal audit plan cover the organisation's key risks as they are recognised by the Senior Management Team and Audit and Governance Committee?
- Is sufficient assurance being received within our annual plan to monitor the organisation's risk profile effectively?

## The Internal Audit Plan: Approach

To develop an appropriate risk-based audit plan, SWAP have consulted with senior management, as well as reviewing key documentation, in order to obtain an understanding of the organisation's strategies, key business objectives, associated risks, and risk management processes.

### Approach to Internal Audit Planning 2020/21

The factors considered in putting together the 2020/21 internal audit plan have been set out below:



Due to the pace of change within Local Authorities and now the impact from Covid-19, it is becoming increasingly difficult to accurately predict longer-term key organisational risks. Our approach to delivering your internal audit plan will remain flexible to meet that change and respond to new and emerging risks. We will be embracing short-term prioritisation with regular review/updates to the audit plan to mirror the changing pace of risk and assurance needs. We will adopt an 'agile' approach and, each quarter, we will review the next quarter's plan to ensure that we are auditing the right areas at the right time; any necessary changes will, of course, be agreed with the Corporate Management Team, and the Audit Committee will be kept informed.

## The Internal Audit Plan: Risk Assessment

A documented risk assessment prior to developing an internal audit plan, ensures that sufficient and appropriate areas are identified for consideration.

As above, it is the responsibility of the Authority's Leadership Team, and the Audit Committee to ensure that, following our risk assessment, the proposed plan contains sufficient and appropriate coverage.

### Internal Audit Annual Risk Assessment

Our 2020/21 internal audit programme of work is based on a documented risk assessment, which SWAP will revisit regularly, but at least annually. The input of senior management as well as review of the Authority's risk register will be considered in this process.

Below we have set out a summary of the outcomes of the risk assessment for East Devon District Council:



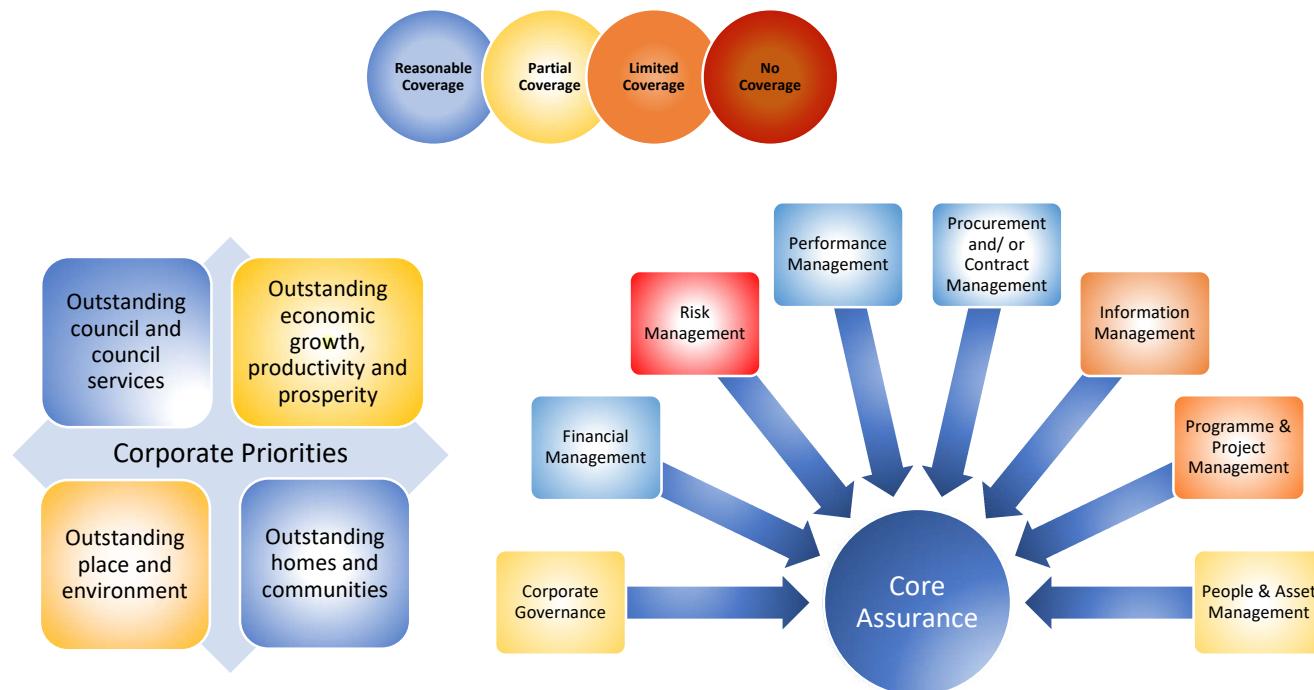
## The Internal Audit Plan: Coverage

Following our SWAP Risk Assessment above, we have set out how the proposed 20/21 plan presented in Appendix 1 provides coverage of the Authority's key corporate outcomes, as well as our core areas of recommended coverage.

Internal audit is only one source of assurance; therefore, where we have highlighted gaps in our coverage, assurance should be sought from other sources where possible in order to ensure sufficient and appropriate assurances are received.

### Internal Audit Coverage in 2020/21

Following our SWAP risk assessment, we have set out below the extent to which the proposed plan presented in Appendix 1 provides coverage of the Authority's key corporate objectives, as well as our core areas of recommended coverage. Where we have highlighted limited or no coverage, Senior Management and Audit Committee should seek and document assurance from alternative sources, or consider re-focussing internal audit resource to provide coverage of these areas:



*Internal audit coverage can never be absolute and responsibility for risk management, governance and internal control arrangements will always remain fully with management. As such, internal audit cannot provide complete assurance over any area, and equally cannot provide any guarantee against material errors, loss or fraud.*

# The Internal Audit Plan: SWAP

**SWAP Internal Audit Services is a public sector, not-for-profit partnership, owned by the public sector partners that it serves. The SWAP Partnership now includes 26 public sector partners, crossing eight Counties, but also providing services throughout the UK.**

**As a company, SWAP has adopted the following values, which we ask our clients to assess us against following every piece of work that we do:**

- **Candid**
- **Relevant**
- **Inclusive**
- **Innovative**
- **Dedicated**

## ● Your Internal Audit Service

### Audit Resources

The current internal audit resources available represent a sufficient and appropriate mix of seniority and skill to be effectively deployed to deliver the planned work. The key contacts in respect of your internal audit service for East Devon District Council are:

Alastair Woodland, Assistant Director – Alastair.woodland@SWAPaudit.co.uk, 07720312467  
Georgina Teale, Senior Auditor – Georgina.teale@SWAPaudit.co.uk

### Conformance with Public Sector Internal Audit Standards

SWAP work is completed to comply with the International Professional Practices Framework of the Institute of Internal Auditors, further guided by interpretation provided by the Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note.

Every three years, SWAP is subject to an External Quality Assessment of Internal Audit Activity. The last of these was carried out in February 2020 which confirmed conformance with the Public Sector Internal Audit Standards.

### Conflicts of Interest

We are not aware of any conflicts of interest within East Devon District Council that would present an impairment to our independence or objectivity. Furthermore, we are satisfied that we will conform with our IIA Code of Ethics in relation to Integrity, Objectivity, Confidentiality, and Competency.

### Consultancy Engagements

As part of our internal audit service, we may accept proposed consultancy engagements, based on the engagement's potential to improve management of risk, add value and improve the organisation's operations. Consultancy work that is accepted, will contribute to our annual opinion and will be included in our plan of work.

### Approach to Fraud

Internal audit may assess the adequacy of the arrangements to prevent and detect irregularities, fraud and corruption. We have dedicated counter fraud resource available to undertake specific investigations if required. However, the primary responsibility for preventing and detecting corruption, fraud and irregularities rests with management who should institute adequate systems of internal control, including clear objectives, segregation of duties and proper authorisation procedures.

# The Internal Audit Plan: SWAP

Over and above our internal audit service delivery, SWAP will look to add value throughout the year wherever possible. This will include:

- Benchmarking and sharing of best practice between our public-sector Partners
- Regular newsletters and bulletins containing emerging issues and risks
- Communication of fraud alerts received both regionally and nationally
- Annual Member training sessions

## Our Reporting

A summary of internal audit activity will be reported quarterly to senior management and the Audit Committee. This reporting will include any significant risk and control issues (including fraud risks), governance issues and other matters that require the attention of senior management and/or the Audit Committee. We will also report any response from management to a risk we have highlighted that, in our view, may be unacceptable to the organisation.

## Internal Audit Performance:

As part of our regular reporting to senior management and the Audit Committee, we will report on internal audit performance. The following performance targets will be used to measure the performance of our audit activity:

Performance Measure	Performance Target
<b><u>Delivery of Annual Internal Audit Plan</u></b> Completed at year end	>90%*
<b><u>Quality of Audit Work</u></b> Overall Client Satisfaction <i>(did our audit work meet or exceed expectations, when looking at our Communication, Auditor Professionalism and Competence, and Value to the Organisation)</i>	>95%
<b><u>Outcomes from Audit Work</u></b> Value to the Organisation <i>(client view of whether our audit work met or exceeded expectations, in terms of value to their area)</i>	>95%

\*Subject to impact from Covid-19

*It should be noted that the audit titles and high-level scopes included below are only indicative at this stage for planning our resources. At the start of each audit, an initial discussion will be held to agree the specific terms of reference for the piece of work, which includes the objective and scope for the review.*

*Due to the outbreak of Covid-19, the audit plan for 2020/21 has to remain flexible. The plan will focus on short-term prioritisation and regular review/updates to the audit plan to mirror the changing pace of risk and assurance needs. This work shall remain on-going.*

*A draft audit plan was discussed and agreed with the EDDC Senior Management Team in February 2020 and discussed with the Audit Committee Chair. The audits listed below for quarter 1 and 2 have been undertaken or are in progress based on the draft audit plan, although subject to priority changes due to Covid-19. Prioritisation of audits during quarter 1 commenced with minimal impact on the delivery of frontline services as agreed with Service Managers and the Section 151 Officer. All reviews listed below will consider the impact of Covid-19 as part of the initial scoping meeting.*

Audit Name	Areas of Coverage and Brief Rationale	Quarter	Link Corporate Risk Register (Strategic or Operational)	Link to Corporate Outcome	Healthy Organisation Theme
<b>Key Control:</b> Key Control Audits are completed as an assessment of the Council's financial control environment. It is essential that all key controls are operating effectively to provide management with the necessary assurance that there is a satisfactory framework on internal control. Financial controls underpin the statement of accounts.					
Accounts Receivable (Debtors)	Review again in 2020/21 as there were significant changes going on in the department including new systems and processes. Review to ensure arrangements are effective for ensuring all invoices are raised where necessary and effective debt collection arrangements in place to maximise income to the Authority.	4	<b>Strategic Risk:</b> Failure to collect all income due to the council	Outstanding council and council services	Financial Management
Accounts Payable (Creditors)	Significant area of where money is going out of the Authority. A review to ensure controls are operating effectively and fraud risks are being effectively managed.	2	<b>Strategic Risk:</b> Insufficient Financial Resources to achieve Council Priorities	Outstanding council and council services	Financial Management
Council Tax and NDR	This area was last reviewed in 2018. This is a significant income stream and therefore area of financial risk to the Authority. A review to ensure controls are operating effectively to maximise income collection.	3	<b>Strategic Risk:</b> Failure to collect all income due to the council	Outstanding council and council services	Financial Management
New Council Tax Reduction Scheme	New Controls will be implemented due to new CTRS (links to Poverty Action Plan). A review on arrangements to ensure operating effectively and minimise the risk of fraud to the Council.	4	-	Outstanding council and council services	Financial Management

Audit Name	Areas of Coverage and Brief Rationale	Quarter	Link Corporate Risk Register (Strategic or Operational)	Link to Corporate Outcome	Healthy Organisation Theme
<b>Governance, Fraud &amp; Corruption:</b> Governance, Fraud and Corruption Audits focus primarily on key risks relating to cross cutting areas that are controlled and/or impact at a Corporate rather than Service specific level. It also provides an annual assurance review of areas of the Council that are inherently higher risk.					
Audit Committee Benchmarking	Compliance with CIPFA Audit Committee Practical Guidance 2018	1	-	Outstanding council and council services	Corporate Governance
Ethical Governance & Culture	<i>Ethical governance is defined as a set of processes, procedures, cultures and values designed to ensure the highest standards of behaviour. This review would seek to confirm that processes, procedures, culture and values are aligned to the Nolan Principles and are working effectively for members and officers.</i>	1	<b>Operational Risk:</b> Failure to support ethical governance and standards within the council and parish councils	Outstanding council and council services	Corporate Governance
Commercialisation Strategy	<i>Significant focus on commercialisation in the new Council Plan. A new Commercialisation Strategy is also being developed and is due to be completed by June 2020.</i>	3	-	Outstanding economic growth, productivity and prosperity	Risk Management
Decision Making	<i>This is to examine the clarity on decision making process and ensure that decisions are made in line with delegated powers. It will also examine the relationship arrangements for effective decision making.</i>	4	<b>Strategic Risk:</b> Retaining and strengthen a collective approach to decision making	Outstanding council and council services	Corporate Governance
Performance Management	<i>Not examined for some time. The performance management process should have clear links from organisational objectives through to individual performance measures so individuals can clearly see how their performance impacts on the organisation. A new Corporate Dashboard is being developed and a New Corporate Report is being designed.</i>	3	<b>Operational Risk:</b> Failure to manage and monitor organisational performance may compromise the Council's reputation	Outstanding council and council services	Programme and Project Management
Council Premises – H&S Compliance	<i>There is numerous legislation covering Health &amp; safety of premises, regulatory reform (fire Safety Order 2005, Control of Asbestos Regulations 2006, Work at height regulations 2005, Electricity at Work Regulations 1989 to name but a few. EDDC have two sites to manage, both with different on-going needs due to the age of the buildings. Assurance to be provided that EDDC is fulfilling its requirements as a Landlord.</i>	2	<b>Operational Risk:</b> Failure to ensure that the corporate property portfolio is fully compliant with legal requirements	Outstanding council and council services	People & Asset Management

Audit Name	Areas of Coverage and Brief Rationale	Quarter	Link Corporate Risk Register (Strategic or Operational)	Link to Corporate Outcome	Healthy Organisation Theme
Procurement	<i>Procurement is a key component in driving through value for money. There are also fraud risks around procurement. Procurement at EDDC is supported by Devon CC. This review will look at measures around delivering value for money, adherence to legislation and local procurement rules as well as the measures in place to minimise the fraud risks.</i>	4	-	Outstanding council and council services	Procurement and/or Contract Management
LED Contract Management	<i>To look at arrangements in place to ensure that the leisure service is being delivered according to the contracts in place.</i>	3	<b>Operational Risk:</b> Failure of LED leisure through budget, legal or reputational issues	Outstanding place and environment	Procurement and/or Contract Management
Firmstep	<i>Major project. Review governance and project arrangements to ensure project benefits are on track and have the best chance to be achieved.</i>	3	-	Outstanding council and council services	Programme and Project Management
Integrated Asset Management Contract	<i>Deferred from 2019/20. Contract has now been in place for a year and is a different type of contract. A review to consider the governance arrangements in place to monitor the delivery of this important contract.</i>	4	<b>Operational Risk – Failure of Responsive Repairs Contractor</b>	Outstanding homes and communities	Procurement and/or Contract Management
Asset Register	<i>A review has been requested to examine the systems and controls in place for recording, monitoring and reporting on the council's general fund assets.</i>	2	-		Asset Management
Business Grants	<i>Time to undertake the 'spotlight' checks on the discretionary business grants.</i>	1	-	-	-
<b>Operational:</b> Operational audits are a detailed evaluation of a Service's control environment. A risk matrix is devised, and controls are tested that mitigate those risks. Where weaknesses or areas for improvement are identified, actions are agreed with management and target dated.					
Housing H&S Compliance (Gas Safety)	<i>We have a rolling Programme of audits covering Gas Safety, Fire Safety Management, Asbestos Management, electrical safety and legionella. For 2020-21 the focus will be on Gas Safety. The Council has a legal duty under the Gas Safety Regulation 1998 to conduct gas safety checks to ensure all rented properties have a valid Gas Safety Certificate. This review will be undertaken to ensure there are sufficient controls in place for the monitoring, completion and achievement of compliance of all gas safety checks.</i>	2	<b>Operational Risk:</b> Failure to satisfy a compliance requirement.	Outstanding homes and communities	Asset Management
Green Waste	<i>This Service been in place for a couple of years. This review will look at how the service is operating to ensure it is achieving its objectives.</i>	1	-	Outstanding council and council services	N/A

Audit Name	Areas of Coverage and Brief Rationale	Quarter	Link Corporate Risk Register (Strategic or Operational)	Link to Corporate Outcome	Healthy Organisation Theme
Disabilities Facilities Grants (DFG) and Better Care Funds	<p>You could get a DFG grant if you're disabled and need to make changes to your home, for example to: widen doors and install ramps; improve access to rooms and facilities – e.g. stairlifts or a downstairs bathroom; provide a heating system suitable for your needs; adapt heating or lighting controls to make them easier to use.</p> <p>The Council haven't been using all the grants allocated. This review will look at how the grants are promoted and administered to ensure they are being used effectively and the risk around fraud is minimised.</p>	4	<b>Operational Risk:</b> Without appropriate controls on approving grants and monitoring budgets there is risk of fraud and to the Council's finances	Outstanding homes and communities	N/A
S106/CIL Compliance	<p>The Council will continue to use S.106 Agreements, alongside CIL, to secure affordable housing from residential development and essential site-specific mitigation, for example on-site children's play facilities, from residential and other types of development that are needed to enable development to proceed. This review will look at how S106/CIL are being used by the Authority as well as arrangements for monitoring delivery of obligations and management of money.</p>	2	<b>Strategic Risk:</b> Lack of Funding to enable the delivery of required infrastructure.	Outstanding levels of economic growth	N/A
Affordable Housing	<p>The East Devon Local Plan promotes the delivery of new affordable housing in the district, through policies relating to affordable housing targets (Strategy 34) and exceptions sites (Strategy 35). The council are rolling out an Affordable Housing supplementary planning document (SPD) to provide guidance on the implementation of these affordable housing policies, giving greater clarity to developers and communities about the expectations for affordable housing delivery in East Devon.</p>	1	-	Outstanding homes and communities	N/A
Private Sector Housing – Fines for Non-compliance	<p>The Council are able to issue Private Sector Landlords with a Civil Penalty for not complying with H&amp;S requirements. This will be a benchmarking review to compare and examine what other Local Authorities are doing and to share best practice.</p>	4	-	Outstanding homes and communities	N/A
<b>Follow -up:</b> Follow up reviews are undertaken where a previous audit has returned a 'Partial Assurance' or 'No Assurance'. This is to provide assurance that areas of weakness have been addressed. Follow up reviews will only focus on the areas of weakness identified in the original review.					
Corporate Health and Safety	Follow up of recommendations raised in partial assurance audit.	4	<b>Strategic:</b> Failure to adequately protect staff health and safety at work	Outstanding council and council services	Risk Management

Audit Name	Areas of Coverage and Brief Rationale	Quarter	Link Corporate Risk Register (Strategic or Operational)	Link to Corporate Outcome	Healthy Organisation Theme
Data Protection (GDPR)	<i>Follow up of recommendations raised in partial assurance audit.</i>	4	<b>Operational:</b> Failure to process information in accordance with FOI and Data Protection legislation	Outstanding council and council services	Information Management
<b>Planning, Advice and Support</b>					
	<i>Time for additional small-scale work, ad hoc advice, committee reporting &amp; attendance, planning and client liaison meetings, in year follow up audits.</i>	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 East Devon District Council, and to outline the scope of internal audit work.

### **Approval**

This Charter was approved by the Audit and Governance Committee on 21 March 2019 and is reviewed each year to confirm it remains accurate and up to date. It was last reviewed by the Audit and Governance Committee on 24 September 2020\*.

### **Provision of Internal Audit Services**

The internal audit service is provided by the SWAP Internal Audit Services (SWAP). 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 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, Audit, Governance and Standards Committee and of Internal Audit**

#### **Management<sup>1</sup>**

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 Chief Executive and the Audit and Governance 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.

#### **Audit and Governance Committee<sup>2</sup>**

The Audit and Governance Committee is responsible for approving the scope of internal audit work, receiving communications from the SWAP Assistant Director on the progress of work undertaken,

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<sup>1</sup> In this instance Management refers to the Senior Management Team and Statutory Officers.

<sup>2</sup> In this instance Audit and Governance Committee relates to "The Board" referred to in the PSIAS

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reviewing the independence, objectivity, performance, professionalism and effectiveness of the Internal Audit function, and obtaining reassurance from the SWAP Assistant Director as to whether there are any limitations on scope or resources.

### **Internal Audit**

The SWAP Assistant Director, as Head of Internal Audit, is responsible for determining the scope, except where specified by statute, of internal audit work and for recommending the action to be taken on the outcome of, or findings from, their work.

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.

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 East Devon District Council will not be asked to 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. Appointment or removal of the Chief Executive of SWAP is the sole responsibility of the Members Meeting.

The Chief Executive for SWAP and Assistant Director also report to the Section 151 Officer, and report to the Audit and Governance Committee as set out below.

The Assistant Director will be the first and primary point of contact for East Devon District Council for all matters relating to the Audit and Governance Committee, including the provision of periodic reports. The Assistant Director is also responsible for the design, development and delivery of audit plans, subject to the agreement of the Council.

### **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 East Devon District Council.

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

- reviewing the reliability and integrity of financial and operating information used for operational and strategic decision making, 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 and communication of risks.

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- 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 Somerset West and Taunton 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, with performance and accountabilities established.
- reviewing the operations of the council in support of the Council's anti-fraud and corruption policy, ethical expectations and corporate values, investigating where necessary.
- 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 resourcing the work.
  - management understand that the work being undertaken is not internal audit work.

### **Planning and Reporting**

SWAP will submit to the Audit and Governance 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 Director. SWAP will report at least two times a year to the Audit and Governance Committee. SWAP will also report a summary of their findings, including any persistent and outstanding issues, to the Audit and Governance 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 will also be copied to the Section 151 Officer and to other relevant line management.

The Assistant Director will submit an annual report to the Audit and Governance 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.

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

Revised March 2020