Leicester, Leicestershire and Rutland Combined Fire Authority The Head of Internal Audit Service's Annual Opinion on the overall adequacy and effectiveness of the control environment 2019-20

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Background

Leicestershire County Council's Internal Audit Service (LCCIAS) provides the internal audit function for the Leicester, Leicestershire and Rutland Combined Fire Authority (the CFA). LCCIAS was externally independently assessed in April 2018 as generally conforming (the top rating) to the Public Sector Internal Audit Standards (the PSIAS) revised from April 2017. The PSIAS require the Head of Internal Audit Service (HoIAS) to give an annual opinion on the overall adequacy and effectiveness of the CFA's control environment i.e. its framework of governance, risk management and control. The PSIAS definition of the control environment is to be found at the end of this document, along with further explanation from the Institute of Internal Auditors about what an effective system of internal control facilitates.

The HoIAS annual opinion is macro-assurance over a defined period of time (financial year 2019-20) and combines: -

- an objective assessment based on the results of individual audits undertaken and actions taken by management thereafter. Individual opinions on what level of assurance can be given as to whether risk is being identified and adequately managed are formed by applying systematic grading to remove any elements of subjectivity. An explanation of the ratings applied is also to be found in the definitions at the end of this document.
 Annex 2 lists the audits undertaken during the year in the respective control environment components (governance, risk management and internal control). The list also contains the individual audit opinion (where applicable) and whether there were any high importance recommendations. Individual audit engagements provide targeted micro-assurance.
- The HoIAS' role in preparing for, attending, reporting to and his observations of the work of the Corporate Governance Committee including its engagement in specific training provided by officers
- Professional judgement of the HoIAS based on his knowledge, experience and evaluation of other related activities. This provides a holistic, strategic insight into the CFA's control environment.

The results of the above, when combined, form the basis for the overall opinion on the CFA's control environment. Individual audits are assigned a rating because it is possible to gather and test evidence for a specific audit topic. The overall opinion reflects that it isn't possible to provide audit coverage over all systems and processes. The caveat at the very end of this document explains what internal control cannot do. i.e., no system of internal control can provide absolute assurance against material misstatement or loss, nor can LCCIAS give absolute assurance, especially given its limited resource. The work of LCCIAS is intended only to provide assurance on the adequacy of the control environment based on the work undertaken and known facts.

Governance related internal audit work

Two planned governance themed audits were completed (GDPR compliance and contract compliance advisory) Further governance related advice on acceptable use of IT equipment was provided.

The HoIAS (or the Audit Manager) attended Corporate Governance Committee and CFA meetings to present internal audit plans and reports. This enabled him to gauge 'good governance' at Member and senior management level at first hand. At its meeting on 11th March 2020, the Corporate Governance Committee approved the revised Internal Audit Plan for 2020-21 after a good discussion around there may need to be changes made due to the Coronavirus pandemic. The Auditors would agree with the Treasurer where their work should be focussed.

The Audit Manager holds regular discussions with the LFRS Senior Management Team, and the Treasurer (and her representatives) and the Monitoring Officer (MO) on governance issues and related audit aspects.

Risk management related internal audit work

In general terms, internal audits planned and conducted are 'risk based' i.e. ensuring that the CFA's management identifies, evaluates and manages risk to achieving its objectives i.e. ensuring sufficient and adequate controls are in place to reduce risk exposure.

One risk management themed audit (on implementation of revised contract procedure rules) was completed. Three high importance recommendations were made.

Management of ICT risk by LFRS was covered within the annual audit of ICT controls.

Financial (and ICT) Controls related internal audit work

Five internal control themed audits were undertaken. Those on pensions and outputs from the National Fraud Initiative were positive, however those on reconciliations and balances, payroll and ICT controls contained some high importance recommendations leading to partial assurance ratings.

The ICT Auditor sought information on the necessary changes to the ICT control environment to cope with lockdown and additional working from home

Head of Internal Audit Service Opinion

For 2019-20 the HoIAS gives reasonable assurance that overall the control environment was adequate and effective. Whilst there were isolated high risk rated weaknesses identified for isolated issues, controls to mitigate key risks are generally operating effectively. The HoIAS is on the whole satisfied with management's response to resolving identified issues.

Definitions

The revised 2017 Public Sector Internal Audit Standards (the PSIAS) define the following: -

Assurance audit

An objective examination of evidence for the purpose of providing an independent assessment on governance, risk management and control processes for the organisation. Examples may include financial, performance, compliance, system security and due diligence engagements.

Assurance audits have four gradings: -

Outcome of the audit

Assurance rating

No (or only a few minor) recommendations

Full assurance

A number of recommendations made but none considered to have sufficient significance to be denoted as **HI** (high importance) Substantial assurance

Includes at least one **HI** recommendation, denoting that (based upon a combination of probability and impact) a significant weakness either exists or potentially could arise and therefore the system's objectives are seriously compromised. Management should quickly address **HI** recommendations and implement an agreed action plan without delay.

Partial assurance

Alternatively, whilst individually none of the recommendations scored a HI rating, collectively they indicate that the level of risk to is sufficient to emphasise that prompt management action is required.

The number and content of the **HI** recommendations made are sufficient to seriously undermine any confidence in the controls that are currently operating.

Little or no assurance

Consulting audit

Advisory and related client service activities, the nature and scope of which are agreed with the client, are intended to add value and improve an organisation's governance, risk management and control processes without the internal auditor assuming management responsibility. Examples include counsel, advice, facilitation and training.

Control

Any action taken by management, the board and other parties to manage risk and increase the likelihood that established objectives and goals will be achieved. Management plans, organises and directs the performance of sufficient actions to provide reasonable assurance that objectives and goals will be achieved.

Control Environment

The attitude and actions of the board and management regarding the importance of control within the organisation. The control environment provides the discipline and structure for the achievement of the primary objectives of the system of internal control. Elements are: -

- Integrity and ethical values
- Management's philosophy and operating style
- Organisational structure.
- · Assignment of authority and responsibility.
- Human resource policies and practices.
- Competence of personnel.

The Institute of Internal Auditors further explains that the control environment is the foundation on which an effective system of internal control is built and operated in an organisation that strives to achieve its strategic objectives, provide reliable financial reporting to internal and external stakeholders, operate its business efficiently and effectively, comply with all applicable laws and regulations, and safeguard its assets.

Caveat

The Financial Reporting Council in an Auditing Practices Board briefing paper, 'Providing Assurance on the Effectiveness of Internal Control' explains what internal control cannot do, namely: -

'A sound system of internal control reduces, but cannot eliminate, the possibility of poor judgement in decision making, human error, control processes being deliberately circumvented by employees or others, management overriding controls and the occurrence of unforeseen circumstances. A sound system of internal control therefore provides reasonable, but not absolute assurance that an organisation will not be hindered in achieving its objectives, or in the orderly and legitimate conduct of its business, by circumstances which may reasonably be foreseen. A system of internal control cannot, however, provide protection with certainty against an organisation failing to meet its objectives, or all material errors, losses, fraud or breaches of laws and regulations'.