2024 – 2025
Draft Internal Audit Plan

OUT OF DARKNESS COMETH LIGHT

Approved by Strategic Executive Board on: 6 February 2024

Approved by Audit and Risk Committee on:

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1. A quick guide to the audit and assurance planning process

Step 1- Audit universe/auditable areas

Identify the audit universe (i.e. a list of themes and areas within them that may require assurance) using a variety of methods:

- Areas of potential risk identified through a variety of sources (including the strategic risk register) as having the potential to impact upon the Council's ability to deliver its objectives. Then, identify if we can gain assurance that any of these risks are being managed adequately from other sources of assurance.

- Key Financial Systems - work undertaken in close liaison with the external auditors, in order to help inform and support the work they are required to undertake.

- Areas where we use auditor's knowledge, discussions with directors, management requests and past experience etc.

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Step 2 – Ranking

Where appropriate score each auditable area as a high, medium or low assurance need using the CIPFA scoring methodology of materiality/business impact/audit experience/risk/ potential for fraud.

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Step 3 – Three year cycle

List the likely medium and high assurance need themes and/or areas for the next three years. High need themed areas will be reviewed annually, medium need usually once in a three-year cycle, while a watching brief will remain on the low needs.

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Step 4 - Next Years Plan

List the themes and where appropriate the types of work that will be undertaken in 2024-2025 in the internal audit plan.

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2.   A glossary of terms

Definition of internal auditing

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

Governance

The arrangements in place to ensure that the Council fulfils its overall purpose, achieves its intended outcomes for citizens and service users and operates in an economical, effective, efficient and ethical manner.

Control environment

Comprises the systems of governance, risk management and internal control. The key elements include:

- establishing and monitoring the achievement of the Council's objectives
- the facilitation of policy and decision-making ensuring compliance with established policies, procedures, laws and regulations – including how risk management is embedded
- ensuring the economical, effective and efficient use of resources and for securing continuous improvement
- the financial management of the Council and the reporting of financial management
- the performance management of the Council and the reporting of performance management.

System of internal control

The totality of the way an organisation designs, implements, tests and modifies controls in specific systems, to provide assurance at the corporate level that the organisation is operating efficiently and effectively.

Risk Management

A logical and systematic method of establishing the context, identifying, analysing, evaluating, treating, monitoring and communicating the risks associated with any activity, function or process in a way that will enable the organisation to minimise losses and maximise opportunities.

Risk based audit and assurance reviews

A review that:

- identifies and records the objectives, risks and controls
- establishes the extent to which the objectives of the system are consistent with higher-level corporate objectives
- evaluates the controls in principle to decide whether or not they are appropriate and can be reasonably relied upon to achieve their purpose, addressing the organisation's risks identifies any instances of over and under control and provides management with a clear articulation of residual risks where existing controls are inadequate
- tests the effectiveness of controls i.e. through compliance and/or substantive testing
- arrives at conclusions and produces a report, leading to management actions as necessary and providing an opinion on the effectiveness of the control environment.

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Audit and Risk Committee

The governance group charged with independent assurance of the adequacy of the internal control environment and the integrity of financial reporting.

Assurance

A confident assertion, based on sufficient, relevant and reliable evidence, that something is satisfactory, with the aim of giving comfort to the recipient. The basis of the assurance will be set out and it may be qualified if full comfort cannot be given. The Head of Audit may be unable to give an assurance if arrangements are unsatisfactory. Assurance can come from a variety of sources and internal audit can be seen as the 'third line of defence' with the first line being the Council's policies, processes and controls and the second being managers' own checks of this first line.

Internal Audit standards
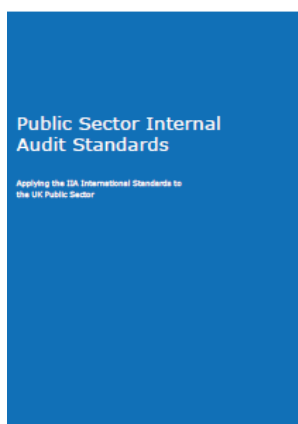
The internal audit team have adopted and comply with the standards as laid out in the Public Sector Internal Audit Standards.

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3. Introduction

The purpose of internal audit is to provide the Chief Executive, Section 151 Officer and Audit and Risk Committee with an independent and objective opinion on risk management, control and governance and their effectiveness in achieving the Council's agreed objectives. In order to provide this opinion, we are required to consider annually the risk management and governance processes within the Council.

We also need to review on a cyclical basis, the operation of the internal control systems. It should be pointed out that internal audit is not a substitute for effective internal control. The true role of internal audit is to contribute to internal control by examining, evaluating and reporting to management on its adequacy and effectiveness.

There is a statutory requirement for internal audit to work in accordance with the 'proper audit practices'. These 'proper audit practices' are in effect the 'Public Sector Internal Audit Standards'. The Council has an Internal Audit Charter which is reviewed and approved annually by the Audit and Risk Committee and defines the activity, purpose, authority and responsibility of internal audit, and establishes its position within the Council. This document sits alongside the charter and helps determine how the internal audit service will be developed.

The purpose of this document is to provide the Council with an internal audit plan, based upon an assessment of its assurance needs. The assessment of assurance needs exercise is undertaken to identify the systems of control and determine the frequency of audit coverage. The assessment will be used to direct internal audit resources to those aspects of the Council which are assessed as generating the greatest risk to the achievement of its objectives.

4. Assessing the effectiveness of risk management and governance

The effectiveness of risk management and governance will be reviewed annually, to gather evidence to support our opinion to the Chief Executive, Section 151 Officer and the Audit and Risk Committee. This opinion is reflected in the general level of assurance given in our annual report and where appropriate within separate reports in areas that will touch upon risk management and governance.

5. Assessing the effectiveness of the system of control

In order to be adequate and effective, management should:

- Establish and monitor the achievement of the Council's objectives and facilitate policy and decision making.
- Identify, assess and manage the risks to achieving the Council's objectives.
- Ensure the economical, effective and efficient use of resources.
- Ensure compliance with established policies, procedures, laws and regulations.
- Safeguard the council's assets and interests from losses of all kinds, including those arising from fraud, irregularity or corruption.
- Ensure the integrity and reliability of information, accounts and data.

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These objectives are achieved by the implementation of effective management processes and through the operation of a sound system of internal control. The consideration of risk management and governance will cover the control environment and risk assessment elements, at a high level. The programme of work developed as the outcome of the assessment of assurance need exercise will cover the system level control activities.

The plan contained within this report is our assessment of the audit work required in order to measure, evaluate and report on the effectiveness of risk management, governance and internal control.

6. Assessment of assurance needs methodology

Internal audit should encompass the whole internal control system and not be limited only to financial control systems. The scope of internal audit work should reflect the core objectives of the Council and the key risks that it faces. As such, each audit cycle starts with a comprehensive analysis of the whole system of internal control that ensures the achievements of the Council's objectives.

Activities that contribute significantly to the Council's internal control system, and also to the risks it faces, may not have an intrinsic financial value necessarily. Therefore, our approach seeks to assign a relative assurance need value. The purpose of this approach is to enable the delivery of assurance to the Council over the reliability of its system of control in an effective and efficient manner.

We have undertaken our assessment using the following process:

- We identified the core objectives of the Council and, where available, the specific key risks associated with the achievement of those objectives
- We then identified auditable themes and areas that impact significantly on the achievement of the control objectives.
- We assigned assurance need values to the auditable themes and areas, based on the evidence we obtained.

The audit plan is drawn out of the assessment of assurance need. The proposed plan covers the 2024-2025 financial year and is detailed at the end of this document.

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7. The assessment of assurance needs - identifying the Council's priorities and the associated risks

At the time this audit plan was prepared, the Council Plan was structured around six priorities:
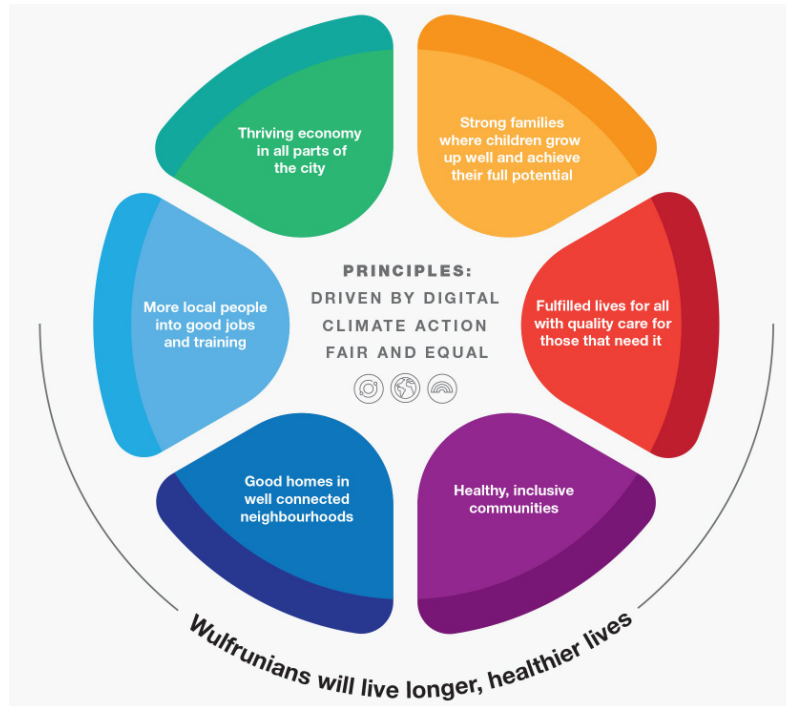
Also, at the time this plan was produced, the Council had identified the following strategic risks as potentially impacting upon its ability to achieve its priorities:

Red Risks	Amber Risks
Safeguarding adults	Adults social care providers
Adults – Adverse CQC rating	Asylum and refugees
Negative assessment of housing standards	Terrorism threats – Locations
Housing supply	Terrorism threats – People
Housing standards	Impact of future pandemics
Information governance	Safeguarding children
RAAC	Housing regulator (damp & mould)
High unemployment	Cyber security
Medium Term Financial Strategy	Major core system failures
Impact of statutory legislation on budgets	Climate change
	Private hire vehicle growth
	Employee well-being
	Employee recruitment and retention
	Equal Pay
	Health & safety of employees
	Business support
	Reputation/Loss of public trust
	City Council led development projects
	Financial well-being and resilience
	City Learning Quarter
	Financial management
	Related parties

7.1 Identifying the "audit universe"

In order to undertake the assessment of assurance need, it is first necessary to define the audit universe for the Council. The audit universe describes all the systems, functions, operations and activities undertaken by the Council. Given that the key risk to the Council is that it fails to achieve its objectives, we have identified the audit universe by determining which systems and operations impact upon the achievement of the core objectives of the Council, as identified above, and the management objectives. These auditable areas include the control processes put in place to address the key risks.

In addition to this, there are also common systems and functions which are generic to all areas, along with a number of mandatory reviews. Where deemed appropriate they may also be included in the audit universe set out in detail at the end of this document.

7.2 Assessing the risk of auditable areas within the assurance framework

Risk is defined as "The threat that an event or action will adversely affect an organisation's ability to achieve its business objectives and execute its strategies."
Source: Economist Intelligence Unit - Executive Briefing.

There are a number of key factors for assessing the degree of assurance need within the auditable area. These have been used in our calculation for each auditable area and are based on the following factors:

- Materiality
- Business impact
- Audit experience
- Risk
- Potential for fraud

In this model, the assignment of the relative values are translated into an assessment of assurance need. These ratings used are high, medium or low to establish the frequency of coverage of internal audit.

8. Developing an internal audit plan

The internal audit plan is based, wherever possible, on management's risk priorities, as set out in the Council's own risk analysis/assessment. The plan has been designed so as to, wherever possible, cover the key risks identified by such risk analysis.

In establishing the plan, the relationship between risk and frequency of audit remains absolute. The level of risk will always determine the frequency by which auditable themes and areas will be subject to audit. This ensures that key risk themes and areas are looked at on a frequent basis. The aim of this approach is to ensure the maximum level of assurance can be provided with the minimum level of audit coverage.

It is recognised that a good internal audit plan should achieve a balance between setting out the planned audit work and retaining flexibility to respond to changing risks and priorities during the year. Traditionally Audit Services produced quite detailed internal audit annual plans identifying all the individual audits planned for the year, and this approach does have the advantage of providing a clear route map to the end of year opinion. However, as the year progresses it is likely that the risks and organisational

priorities will change, resulting in changes to the plan. This is a particular issue within the local authority environment at this moment in time, due to the pace of change and high level of uncertainty affecting the risk environment. Therefore, for this year we are again keeping the audit plan and the likelihood that it may change in year, more open than previously. This approach should hopefully result in a more realistic and flexible plan.

Auditor's judgement will be applied in assessing the number of days required for each audit identified in the plan.

The assessment of assurance need's purpose is to:

- determine priorities and establish the most cost-effective means of achieving audit objectives;
- assist in the direction and control of all audit work.

This exercise builds on and supersedes previous internal audit plans.

Included within the plan, in addition to audit days for field assignments are:

- a contingency allocation, which will be utilised when the need arises, for example, special projects, investigations, advice and assistance, unplanned and ad-hoc work as and when requested.
- a follow-up allocation, which will be utilised to assess the degree of implementation achieved in relation to key recommendations agreed by management during the prior year.
- an audit management allocation, which is used for management, quality control, client and external audit liaison and for preparation for, and attendance at various member meetings and Audit Committee etc.

9. Considerations required of the Audit and Risk Committee and the Council's Senior Management Team

- Are the objectives and key risks identified consistent with those recognised by the Council?
- Does the plan include all the themes which would be expected to be subject to internal audit?
- Are the risk scores applied to the plan reasonable and reflect the Council?
- Is the allocation of audit resource accepted, and agreed as appropriate, given the level of risk identified?
- Does the plan cover the key risks as they are recognised?

10. How the internal audit service will be delivered

10.1 Staffing

The audit team follow the Council's core behaviours. They are recruited, trained and provided with opportunities for continuing professional development. Employees are also sponsored to undertake relevant professional qualifications. All employees are subject to the Council's appraisal scheme, which leads to an identification of training needs. In this way, we ensure that employees are suitably skilled to deliver the internal audit service. This includes the delivery of specialist skills which are provided by staff within the service with the relevant knowledge, skills and experience.

10.2 Quality assurance

All audit work undertaken is subject to robust quality assurance procedures as required by relevant professional standards. These arrangements are set out in the division's standards manual and require that all working papers and reports are subject to thorough review by professionally qualified accountancy staff.

10.3 Resources required

It is estimated that approximately 1,300 internal audit days (including fraud, assurance and contingency work) will be required to deliver the audit plan.

11. Audit Service's External Clients

The City of Wolverhampton Council's Audit Services also currently provides the internal audit service to a number of other associated public-sector based organisations in the West Midlands. Separate internal audit plans are produced for each of these and Audit Services reports back to each of their respective Audit Committees or equivalent.

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How proposed reviews within the 2024/25 Audit Plan link to the Council Plan and its six priorities

Strong Families where children grow up well and achieve full potential	Fulfilled lives with quality care for those that need it	Healthy, inclusive communities	Good homes in well-connected neighbourhoods	More local people into good jobs and training	Thriving economy in all parts of the city
Post 16 – Out of City Placements	Adult Social Care Working Practices	WV Active – Income Collection and Monitoring Arrangements	Planning Application Refunds	Local Employer Support	City Events – Mitigation of risks for Outdoor Events
School Attendance Reviews	Payment to Adult Social Care Providers	Public Health Grant Funding	Wolverhampton Incinerator – Energy from Waste	City Learning Quarter	Management of the City's art and cultural assets
School Establishment Audits	Adult Social Care Debt Recovery Arrangements	Public Health Contracting Arrangements	Waste Services – Working Arrangements		Regeneration – Resource Planning and Procurement and Contracting Arrangements
Passenger Transport Arrangements	Social Worker Recruitment review		Private Hire Vehicles		Levelling up – Bilston Health Hub and Regeneration
Families First Pathfinder Programme			Bereavement Services		
Supporting Families Grant review			Housing Disabled Facility Grants		
			Housing Regulator Inspection		
			Focussed Housing Reviews		

Cross Council Reviews (Driven By Digital – Climate Action – Fair and Equal)

- Key Financial System Reviews
- Annual Certifications
- Procurement Non-Compliance
- Equal Pay Assurance
- Upgrade to Agresso Business World
- Budget Monitoring of Fleet Capital Spend
- Contract Monitoring
- Mayor's Charity Trust

- Part Year Working
- Project Management System (Verto)
- Sickness Absence Recording and Monitoring
- Information Governance: Data Breaches
- Health and Safety Review
- Council Linked Bodies
- Regulation of Investigatory Powers Act (RIPA) Compliance
- Ethics Review

- Approval Process for Legal Prosecutions
- Implementation of Omni Channel System
- Recovery Arrangements for Core System Failures
- Data and Analytics – Data Quality

Details in respect of each of the audits above are provided in the tables below.

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The Internal Audit Plan 2024-2025

The following reviews and associated services will be delivered across the Council:

Auditable Area	Purpose
National fraud initiative (NFI)	In accordance with Cabinet Office requirements, we will lead on the Council's NFI data matching exercise.
Fraud investigations	The carrying out of investigations into areas of suspected or reported fraudulent activity across the Council.
Counter fraud activities	A series of Council wide pro-active fraud activities, including the targeted testing of areas open to the potential of fraudulent activity including where appropriate maintenance of the Council's fraud risk register, hosting raising fraud awareness seminars and running fraud surgeries and e-learning.
Value for money reviews (if applicable)	During the year discussions will be held with senior management regarding the identification of potential value for money areas, where Audit Services could be of assistance in performing value for money advice and or/reviews.
Recommendation follow up	A regular and ongoing follow up of key internal audit recommendations made across the Council in 2023 - 2024.
Development and advice	Reviewing system developments on key controls and providing advice relating to systems which are not necessarily covered by audits originally scheduled for 2024-2025.
Contingency	Special projects, advice and assistance, unplanned and ad-hoc work as and when requested.
Management	Day to day management of the internal audit service, quality control, client and external audit liaison and preparation for, and attendance at various meetings.
Audit and Risk Committee	Preparation and presentation of papers for the Audit and Risk Committee. This also includes providing advice and training to support committee members.

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Audit	Purpose of Audit	Assurance Need
Accounts Payable (Creditors) Accounts Receivable (Debtors) Budgetary Control Fixed Assets General Ledger Housing Benefits Housing Rents Income Management Local Taxes (Council Tax and NNDR) Treasury Management	These relate to the annual key financial systems. They are high-level reviews which provide assurance of the core controls within each of the financial systems. This work will be co-ordinated, where appropriate, in line with any work undertaken by the Council's External Auditors in order to avoid duplication.	High
Annual Certifications	These will include verification of the calculations provided on Senior Officer Remuneration and WMPF Payroll Contribution Statements.	Medium
Procurement Non-Compliance Monitoring (including the award of major contracts)	A high-level review of contracts to ensure they have been procured in accordance with the Council's Contract Procedure Rules and procurement regulations.	Medium
Equal Pay Assurance	A review of payments and allowances processed through the Council's payroll system to ensure they have been made in accordance with the collective agreement. Also, a horizon scanning exercise of emerging equal pay risks to ensure they are being managed by the Council effectively.	High
Upgrade to Agresso Business World	To provide assurance through migration testing that data and access controls are not compromised as a result of the upgrade.	High
Budget Monitoring of Fleet Capital Spend	To provide assurance on the approval process for capital spend on the Council's fleet, and associated budget monitoring arrangements.	Medium

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Audit	Purpose of Audit	Assurance Need
Contract Monitoring	To provide assurance on the implementation of the Council's new contract management system by the Council's Commercial Services Team.	Medium
Mayor's Charity Trust	The annual independent examination of the accounts in order to meet the requirements set out under section 145 of the Charities Act 2011.	Medium
Part Year Working	To provide assurance on phase two of the Council's part year working project.	Medium
Project Management System (Verto)	To provide assurance on the effectiveness of controls and data held on the Council's project management system.	Medium
Sickness Absence Recording and Monitoring	To provide assurance that managers are recording and monitoring sickness in accordance with the Council's management of attendance policy.	Medium
Information Governance: Data Breaches	To provide assurance that actions put in place as a response to identified data breaches have been implemented.	Medium
Health and Safety Review	An annual focussed review of an area of health and safety.	Medium
Council Linked Bodies	An annual review of one of the Council linked bodies to ensure appropriate agreements and monitoring arrangements are in place.	Medium
Regulation of Investigatory Powers Act (RIPA) Compliance	A compliance review to ensure that new RIPA processes and procedures have been embedded within the Council.	Medium
Ethics Review	To provide assurance that ethical arrangements are embedded within the organisation.	Medium
Approval Process for Legal Prosecutions	To provide assurance that the Council has clear processes and procedures in place for approving prosecution cases.	Medium

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Audit	Purpose of Audit	Assurance Need
City Events – Mitigation of risks for Outdoor Events	A review of the arrangements in place to mitigate Council losses in terms of the late cancellation of events and artist performances.	Medium
Management of the City's art and cultural assets	To provide assurance that there are adequate arrangements in place for the cataloguing, storage, and evaluation of the city's art and cultural assets.	Medium
Civic Halls – Operator Contract Monitoring Arrangements	To provide assurance that there are appropriate contract monitoring arrangements in place for the Civic Halls' operator.	Medium
Implementation of Omni Channel System	To provide project assurance and support on the implementation of the Council's Omni Channel System.	Medium
Recovery Arrangements for Core System Failures	To provide assurance around the robustness of business continuity plans in the event of core IT system failures.	High
Local Employer Support	To provide assurance of the processing, administration and award to businesses of grants received for business support.	Medium
Data and Analytics – Data Quality	To provide assurance around the general quality of data in systems and also a specific review of quality assurance arrangements for data included in statutory returns which are not performed by the Council's Data and Analytics team.	Medium
Post 16 – Out of City Placements	To provide assurance that new processes implemented in respect of a procurement framework for Specialist Independent Provision and spot purchase exemptions.	Medium
School Attendance Review	To provide assurance on attendance policies and monitoring arrangements, for Council schools, in light of government concerns and recent publicity about high absence levels.	Medium

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Audit	Purpose of Audit	Assurance Need
School Audits	A review of the governance and financial procedures in place at a sample of nursery, primary, secondary, special schools and pupil referral units to ensure coverage of all local-authority maintained schools on a cyclical basis.	Medium
Childrens Social Worker Recruitment	To provide assurance that the revised social worker recruitment procedures have been embedded and are operating effectively.	Medium
Childrens Families First Pathfinder Programme	To review the application and use of 'Family network support packages'. Assurance will be provided in respect of the new processes being developed.	Medium
Childrens Supporting Families Grant Claim 2024/25	Ongoing assistance with claims process and verification of claims prior to formal submission to Department of Levelling Up, Communities and Housing (DLUCH).	Medium
Adult Social Care Working Practices	To provide assurance that working practices and supervision arrangements across social care teams are efficient, effective and consistent, and that adequate safeguarding arrangements are in place.	Medium
Payments to Adult Social Care Providers	To provide assurance that payments to adult social care providers are processed correctly and quality assurance checks are undertaken on providers.	Medium
Adult Social Care Debt Recovery Arrangements	To provide assurance that appropriate debt recovery arrangements are in place for the provision of adult social care to ensure income is maximised.	Medium
WV Active - Income Collection and Monitoring Arrangements	To provide assurance that income is collected and monitored. Particular focus will be placed on debt recovery arrangements.	Medium
Public Health Grant Funding	To provide targeted review on specified grants to ensure funding is appropriately used and output delivery is effectively monitored.	Medium
Public Health Contracting Arrangements	To provide a targeted review of the contracting arrangements with a specified Public Health provider.	Medium

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Audit	Purpose of Audit	Assurance Need
Bereavement Services	To provide assurance on compensation payments for stolen plaques and the stock management arrangements for chargeable items.	Medium
Energy from Waste Contract	To provide assurance that there are appropriate contract management arrangements in place for the short term operation of the site.	Medium
Passenger Transport Arrangements	To provide assurance regarding passenger transport arrangements taking into account demographic increases, increased pressures and safeguarding concerns.	Medium
Waste Services – Working Arrangements	To provide assurance that appropriate arrangements are in place for monitoring working hours for waste services operatives.	Medium
Private Hire Vehicles	To undertake a focussed review on the city's private hire vehicle arrangements.	High
Regeneration – Resource Planning and Procurement and Contracting Arrangements	To provide assurance that regeneration resource plan to ensure there is robust evidence, regular monitoring and reporting around procurement and contracting activity. Specifically in respect of development projects, to ensure the Council's Contract Procedure Rules and procurement regulations are complied with.	High
City Learning Quarter	To provide ongoing advice and support in the delivering of the City Learning Quarter programme. This may include a focussed review.	High
Levelling Up – Bilston Health Hub and Regeneration	To provide assurance regarding the project management arrangements for the Bilston Health Hub.	Medium
Planning Application Refunds	To provide assurance that there are appropriate monitoring mechanisms in place to ensure planning application refunds are processed where statutory timescales are not met.	Medium

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Audit	Purpose of Audit	Assurance Need
Reinforced Autoclaved Aerated Concrete (RAAC) Assurance	To provide assurance that the Council has appropriate arrangements in place for the identification of high risk assets which could contain RAAC and the remedial action that should be taken.	High
City Assets – Contract Review	To undertake a focussed contract review for a City Assets project in order to ascertain the level of compliance with procurement and contract procedure rules.	Medium
City Assets – Statutory Compliance Audit	To undertake a review a sample of statutory requirements and provide assurance regarding the level of compliance.	Medium
Housing Disabled Facility Grants	To provide assurance of the contract monitoring arrangements to the delivery of the Service Level agreement of disabled facility grants.	Medium
Housing Regulator Inspection	To provide on-going support and advice on the Council's readiness for the inspection to be carried out by the Housing regulator.	Medium
Housing focussed Audit Reviews	To undertake focussed Housing audits in order to provide assurance as and when required during the year.	Medium

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Programme and Project Assurance

In addition to the traditional internal audit plan, Audit Services also provide an ongoing assurance role by having an independent role on a number of programmes, projects boards and working groups, including:

Programme and Project related assurance work	
• Business World (Agresso) Board	• Transforming Adult Social Care Programme
• Pay Strategy Board	• Children's Transformation Programme
• Project Assurance Group	• Culwell Depot Relocation and Modernisation Programme
• Our People Board	• Wolves at Work 18-24 Programme Board
• School Compliance Board	• Energy from Waste Future Operating Model Board
• Terms Time Only (Holiday Pay) Programme	• Strategic Transport Asset Group
• City Learning Quarter Programme	• Adult Eclipse Project Board
• Strategic Health, Safety & Well-being Board	• Resilience Board
• Part Year Working Board	• Omni Channel Programme
• Strengthening Families Together Board	• Families Pathfinder Programme
• RAAC Assurance Group	• City Assets - Asset Management System

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