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Audit Committee

Tuesday, 15 June 2010 at 7.30 pm Committee Room 4, Brent Town Hall, Forty Lane,

Wembley, HA9 9HD

Membership:

Members first alternates Second alternates

Councillors: Councillors: Councillors:

Al-Ebadi (Chair) Beckman S Choudhary

CumminsAshrafGreenVan KalwalaHarrisonHector

For further information contact: Anne Reid, Democratic Services Officer 020 8937 1359, anne.reid@brent.gov.uk

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The press and public are welcome to attend this meeting



Agenda

Introductions, if appropriate.

Apologies for absence and clarification of alternate members

Item Page

1 Declarations of personal and prejudicial interests

Members are invited to declare, at this stage of the meeting, any relevant financial or other interest in the items on this agenda.

2 Deputations

3 Minutes of the previous meeting

1 - 6

4 Matters arising

5 Audit Commission documents

7 - 38

This report includes a number of documents produced by the Audit Commission in their role as the Council's external auditors.

Ward affected: Contact Officer: Duncan McLeod, Director of Finance

and Corporate Resources

All Wards Tel: 020 8937 1424 duncan.mcleod@brent.gov.uk

6 The National Fraud Initiative

39 - 44

This report provides details of the Audit Commission's National Fraud Initiative (NFI) and summarises the council's work in relation to the 2008/09 exercise.

Ward affected: Contact Officer: Simon Lane, Audit and

Investigations

All Wards Tel: 020 8937 1260 simon.lane@brent.gov.uk

7 Final Internal Audit Progress Report 2009/10

45 - 110

This report summarises the work of Internal Audit for 2009/10 and provides an update on progress since the previous report to this Committee on 3 March 2010.

Ward affected: Contact Officer: Simon Lane, Audit and

Investigations

All Wards Tel: 020 8937 1260 simon.lane@brent.gov.uk

This report sets out the proposed Annual Governance Statement for inclusion in the council's accounts for 2009/10 as required by the Accounts and Audit Regulations 2003 (as amended).

Ward affected: Contact Officer: Duncan McLeod, Director of Finance

and Corporate Resources

All Wards Tel: 020 8937 1424 duncan.mcleod@brent.gov.uk

9 Internal Audit Annual Report 2009/10

141 - 148

This report is the annual report from the Head of Internal Audit. The report includes an opinion on the overall adequacy and effectiveness of the Council's internal controls and presents a summary of the audit work undertaken during the year.

Ward affected: Contact Officer: Simon Lane, Audit and

Investigations

All Wards Tel: 020 8937 1260 simon.lane@brent.gov.uk

10 Audit Committee potential training requirements

11 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Democratic Services Manager or his representative before the meeting in accordance with Standing Order 64.

12 Date of next meeting

The next scheduled meeting of the Audit Committee is scheduled to be held on 29 September 2010.



Please remember to **SWITCH OFF** your mobile phone during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.
- Toilets are available on the second floor.
- Catering facilities can be found on the first floor near The Paul Daisley Hall
- A public telephone is located in the foyer on the ground floor, opposite the Porters' Lodge





LONDON BOROUGH OF BRENT

MINUTES OF THE AUDIT COMMITTEE Wednesday 3 March 2010 at 7.30 pm

PRESENT: Councillor Cummins (Chair), and Councillors Butt and Detre

Apologies were received from Councillor H M Patel

1. Declarations of personal and prejudicial interests

None declared.

2. **Deputations**

None received.

3. Minutes of the previous meeting

RESOLVED:

that the minutes of the previous meeting, held on 17 December 2009, be approved as an accurate record of the meeting.

4. Matters arising

Minute 5 – Treasury Management Report

The Chair reported that he had been consulted by officers on the appointment of the Council's treasury adviser. Minded to endorse the appointment, he had in turn consulted the other members of the Audit Committee, Councillors H B Patel and Butt. This had been done in the interests of transparency and the Council's previous advisers had been replaced through a process of consideration. Asked whether the committee's involvement had created a precedent, Duncan McLeod (Director of Finance and Corporate Resources) informed the Committee that this was not the case and that the process could in any case be reviewed for the future. Duncan McLeod told the Committee that he felt the involvement of members in what was already a rigorous process had been useful.

5. Audit Commission documents

Duncan McLeod (Director of Finance and Corporate Resources) referred to the six documents produced by the Audit Commission in their role as the Council's external auditors. He drew members' attention to the fact that the progress report on the work currently being planned or undertaken by the Audit Commission included a commentary on International Financial Reporting Standards (IFRS). He also pointed out that the Audit Commission's letter to the Committee on compliance with International Auditing Standards was not part of the progress report, as it was felt

that it was difficult to do justice to it at the meeting. A separate meeting with the Chair and the Committee would be organised to discuss it. Duncan McLeod also drew members' attention to the fact that the Annual Audit Letter summarising the findings of the 2008/09 audit had been presented to the Council's Executive in January 2010.

(i) Progress Report, March 2010

Paul Viljoen (Audit Commission) introduced the report, which briefed the Committee on work currently being planned or undertaken by the Audit Commission. He reported that the 2008/09 audit programme had been completed, and that two supplementary opinion plans and a report on grants were on the Committee's agenda. Paul Viljoen highlighted the fact that local government financial statements needed to comply with IFRS from 2010/11 onwards and that Brent had made progress towards this. Responding to a question about the Audit Commission's supplementary fee, Duncan McLeod informed the Committee that the single financial accounting system would be implemented from 1 April 2010. He hoped that this would lead to a reduction in fees in future years.

(ii) Certification of Claims and Returns – Annual Report, February 2010

Paul Viljoen (Audit Commission) informed the Committee that this report showed an improvement on the previous year, and this had been reflected in the Audit Commission's reduced fee. However, there were still issues relating to the certification of grants and amendments and qualification letters. Paul Viljoen drew members' attention to the fact that the general auditing concepts of reasonableness and materiality did not apply to grants, as a result of which matters that were sometimes very minor needed to be reported.

(iii) Annual Audit Letter, December 2009

Andrea White (Audit Commission) introduced the Annual Letter, which summarised work on the 2008/09 audit. She reported that everything reported on in the letter had already been put before the Committee. The main issues were that an unqualified opinion had been issued on the main accounts and the Pension Fund. as well as a conclusion on value for money. The recommendations in the Annual Governance Report had been agreed with officers and were being taken forward. Responding to members' disappointment at the scored judgement on governance. Duncan McLeod informed the Committee that the Audit Commission's commentary and action plan on areas for improvement was helpful, and that the Council had worked hard on this. The assessment of the current year was already being undertaken, with improvements expected. The governance judgement was affected by issues around audits of foundation schools, for example, which the Council would now undertake in addition to the audits carried out by the schools' own auditors. Duncan McLeod added that the Council would not be responsible for auditing the academies, as they lay outside the Council's financial framework. Simon Lane (Head of Audit and Investigations) informed members that the Council was now imposing itself as auditor on the foundation schools because it had found that some audits were inadequate. He agreed to inform members if the Council met with obstruction in this process. In response to questions from members, Simon Lane reported that it could be difficult to get schools' auditors to release audit working papers, and that the contract was between the individual school and its

auditors. While the Council could write terms of engagement with auditors and get schools to do the same, the test would be whether auditors would release working papers. Andrea White added that this was a complex arrangement, but that the Audit Commission was interested in the Council's own arrangements. She added that it was the responsibility of the Director of Finance to set up arrangements to sign off the Dedicated Schools Grant, incorporating checks and balances, and that the Audit Commission would comment on the overall arrangements. Duncan McLeod informed members that the Council's concern was that appropriate arrangements were in place. He added that, as soon as some of the audits of foundation schools had been carried out, the programme would be reviewed and amended if not adequate.

(iv) Audit Opinion Plan, February 2010

Paul Viljoen (Audit Commission) introduced the Audit Opinion Plan, which followed from the audit plan issued the previous year, setting out the work to be carried out and specific risks identified to date. The Audit Commission's fee had increased by £10,000 in response to specific risks identified. These included the accounting treatment of Private Finance Initiative (PFI) projects. This was part of the wider scope of IFRS, but was being introduced a year early. Other risks concerned the results of internal audit work, as well as irregularities at an individual school and subsequent arrangements. Responding to members' questions, Paul Viljoen explained that the PFI issue related to accounting for PFI projects as assets and liabilities in the Council's accounts. This was a complex chain of events, involving the need to make accounting decisions with a higher chance of errors.

(v) Pension Fund Opinion Plan, February 2010

Paul Viljoen (Audit Commission) briefed the Committee on the Pension Opinion Plan, which followed from the plan issued the previous year, setting out the work to be carried out and specific risks identified to date. The report had already been presented to the Pension Fund Sub-Committee. The risks identified related to unquoted investments, the valuation of which was challenging, the completeness of investment commitment disclosures and full compliance with the relevant Statement of Recommended Practice (SoRP).

While recognising the difference in the roles of the two committees, members discussed the apparent duplication of work in that this document had also been considered by the Pension Fund Sub-Committee. Duncan McLeod acknowledged that there was a level of duplication, and agreed that some anomalies needed to be resolved. He had referred the matter to the Interim Borough Solicitor, together with the proposal that the Audit Committee have an independent chair.

(vi) Human Resources Follow-Up Report, January 2010

Andrea White (Audit Commission) informed the Committee that the Audit Commission had reviewed Human Resources (HR) three times since 2003. Improvements had been made, but the 2005 review reported that the pace of improvement was slow. The 2008 review commented on progress in all areas, with work still to do. Since then the management structure had changed, and HR was now at the centre of the Council's business. However, improvements needed included a system of early warnings and good performance information. The role of

the strategic HR group also needed to be looked at. The report was positive in the main, and arrangements were now good, despite the slow start.

RESOLVED:

that the report and Audit Commission documents be noted.

6. International Financial Reporting Standards

Ben Ainsworth (Finance) introduced the report and answered questions from Councillors on the process of transition to International Financial Reporting Standards (IFRS) from UK Generally Accepted Account Practice (GAAP). He informed the Committee that currently the Council was required to report under UK GAAP, but that in the 2007 Budget the Chancellor had announced the move to IFRS for all the government's accounts. Local authorities were also required to do this, and 2010/11 would be the first accounts fully based on IFRS. The 2009/10 and 2008/09 accounts would be restated to take account of IFRS, with the principal changes in the statement of accounts. Private Finance Initiative (PFI) projects would be brought onto the balance sheets, as well as other leases and employee benefits. Liabilities were likely to increase as a result, and this could lead to a need to increase the prudential borrowing limit. The Council was putting considerable effort into the move to IFRS. A team had been set up, led by the Head of Finance Management, with PricewaterhouseCoopers (PwC) as external consultants to advise on the standards and to analyse the PFI contracts. An outline plan was included in the report, and the Council had met with the Audit Commission to agree a set of actions. Asked about resource implications and the timescale, Ben Ainsworth informed the Committee that work on IFRS was currently being accommodated within the existing budgetary allocation. However, the Council would need to take account of the extra demands made by IFRS and plan responses to this in order to minimise the amount of work to be done. The introduction of a single financial system would help minimise any resource requirements. Duncan McLeod (Director of Finance and Corporate Resources) added that the move to IFRS was something the Council was required to do, and it had to become a top priority. He was confident that the new system would be ready when the current year's accounts were ready at the end of June 2010.

Asked whether formulae could be used to assess the value of components of buildings, Ben Ainsworth informed members that components would be assessed professionally by Council surveyors. Duncan McLeod added that this aspect of the transition had needed extra support. Answering a question about the difference between finance and operating leases, Ben Ainsworth explained that finance leases were treated as both assets and liabilities in the statement of accounts, but that operating leases were shown only as an expenses item. He added that, since the report had been written, the government had made it clear that there would be no council tax implications of consequences of the move to IFRS.

RESOLVED:

that the report be noted.

7. Treasury Management Strategy and Annual Investment Strategy

Martin Spriggs (Head of Exchequer and Investment) introduced the report and answered questions from members on the Council's treasury and investment strategies and current market developments. He reported that market conditions remained volatile and that the Council had been discussing the lending list with its new treasury adviser, Arlingclose. Martin Spriggs reported that officers had met with Arlingclose for the first time on the day of the meeting, and that the company had started work at the beginning of the week. The strengths of Arlingclose included credit analysis, but their approach to lending was not dramatically different to that previously outlined to members. While the intention had been to diversify investment to overseas banks of appropriate standing, this had not been possible in the current volatile conditions, although some UK banks were being added to the lending list. However, it was hoped that market conditions would allow the addition of overseas banks in the next few months.

Answering members' questions, Martin Spriggs reported that the reference to the removal of the Halifax from the lending list (paragraph 3.3 of the report) was an error – it was in fact the Abbey National.

Asked about the contract with the Council's previous treasury adviser, Martin Spriggs reported that this would expire on 31 March 2010. The company would continue to supply information to the Council, but no active work would take place.

RESOLVED:

that the report be noted.

8. Internal Audit Progress Report April 2009 to January 2010

Simon Lane (Head of Audit and Investigations) presented the report and answered questions from members on the internal audit reports issued since December 2009 and a summary of the work of internal audit for the period 1 April 2009 to 31 January 2010. He reported that the team was on target to achieve its plan by the end of the year, when the Committee would receive a report. One concern was the higher level of limited, as opposed to substantial assurance. Currently this was 50:50, with a higher rate of limited assurance than in previous years. However, the audits were not ones that had been carried out in the past. Two limited assurance judgements related to the Corporate Health and Safety Review and an IT application for receiving cash. The target of completing Financial Management Standards in Schools (FMSIS) audits of primary schools was on track for completion by the end of March 2010, and the results of customer satisfaction surveys showed continuing relatively high satisfaction. Phil Lawson (Deloitte) added that the outcome of two audits finalised since the report had been written had shown substantial assurance. He also reported that high level recommendations had been acted on in relation to the Corporate Health and Safety Review and IT cash application.

RESOLVED:

that the report be noted.

9. Internal Audit Plan for 2010/11

Simon Lane (Head of Audit and Investigations) presented the report and answered questions from members on the proposed internal audit plan for 2010/11. Key information was the number of days allocated to various parts of the Council. For example, 100 days — out of a total of 1200 — were allocated to Finance and Corporate Resources for work on the main financial systems and 130 days to schools. A more detailed report would be presented at the end of the year. In the meantime, Simon Lane invited members to comment on any audit risks they were aware of across the Council.

Asked whether the plan was achievable, Simon Lane informed the Committee that there was always a risk of slippage, particularly in relation to the major transformation programme the Council was undertaking. However, the number of audit days would be delivered, even if there was slippage in relation to timing.

RESOLVED:

that the report be noted.

10. Date of next meeting

The Committee noted that the date of the next meeting of the Audit Committee would be confirmed by Full Council in May 2010.

The meeting closed at 8.55 pm

M CUMMINS Chair



Audit Committee 15 June 2010

Report from the Director of Finance and Corporate Resources

For Information

Wards affected: ALL

Audit Commission documents

1.0 Summary

1.0 This report includes a number of documents produced by the Audit Commission in their role as the Council's external auditors.

2.0 Recommendations

2.1 The Audit Committee is asked to consider the documents and instruct officers of any actions they require to be taken as a result.

3.0 Detail

- 3.1 The documents attached to this report are as follows:
 - (i) Appendix 1 Progress Report June 2010

The purpose of this report is to brief the Audit Committee on work currently planned or undertaken by the Audit Commission.

(ii) Appendix 2 - Performance Management

The Audit Commission carried out a performance management review in 2008. This looked at several areas of performance management and included a follow-up of an earlier review of partnership working. This high-level review follows up on the recommendations made in the report on performance management and assesses what progress has been made in completing them.

(iii) Appendix 3 - Fee Letter

A copy of the Annual Audit Fee 2010/11.

- 4.0 Financial Implications
- 4.1 The audit fee will be met from current budgets.
- 5.0 Legal Implications
- 5.1 None
- 6.0 Diversity Implications
- 6.1 None
- 7.0 Background papers
- 7.1 As listed above
- 8.0 Contact Officers

Duncan McLeod, Director of Finance and Corporate Resources, Brent Town Hall, Forty Lane, Wembley, Middlesex HA9 9HD, Tel. 020 8937 1424.

DUNCAN McLEOD
Director of Finance and Corporate Resources

Progress Report June 2010

Brent London Borough Audit 2009/10

Audit Committee 15 June



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Status of our reports

The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors/members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.

Summary

Introduction

1 The purpose of this progress report is to brief the Audit Committee on work currently being planned or undertaken by the Audit Commission.

Audit Progress

- 2 Our 2009/10 audit has commenced. We have completed our initial opinion planning procedures and are currently performing our review of key financial systems. We aim to finalise our controls testing in June 2010.
- 3 The Audit Commission has sent to all Councils, LSPs and other affected bodies a letter communicating that CAA work has stopped following the new government's recent announcement. We have included a copy of at Appendix 3.
- 4 We have finalised our Performance management follow up, as detailed in our 2009/10 Audit plan. The findings are summarised below:
 - Good progress has been made to implement all the recommendations of the
 previous review with specific actions taken to improve systems and processes. We
 have followed up recommendations from our most recent report in 2008. One
 recommendation was made to improve on-line partnership information in
 accordance with the partnership working guidance. This has been reported and
 agreed with officers. Our report is included on the agenda for the Audit Committee.
- We have completed the fieldwork on phase two of our Health inequalities review, as detailed in our 2009/10 Audit plan. We expect to issue a report setting out our findings, together with any recommendations by the end of June 2010.
- We have agreed our fee for 2010/11 with the Director of Finance and Corporate Resources at a meeting on the 22 M arch 2010. The total indicative fee for the audit for 2010/11 is for £488,000 (excluding VAT), which compares with the planned fee of £470,000 for 2009/10. This is included on the agenda for the Audit Committee.
- 7 The Audit Commission has recently finalised its review of audit fees for Pension Fund audits. We will shortly meet and agree the fee for the 2010/11 audit with the Director of Finance and Corporate Resources.

International Financial Reporting Standards

8 We have summarised the International Financial Reporting Standards (IFRS) briefing papers for Local government issued since our last progress report.

Countdown to IFRS - Identifying and accounting for leases (17 March 2010)

- 9 Countdown to IFRS, published in February 2010, we said that we would be issuing a series of briefing papers covering the technical issues local authorities need to address now if they are to achieve a smooth transition to IFRS. This is the first in that series and looks and the issues arising from the introduction of International Accounting Standard (IAS) 17: Leases.
- 10 In our November 2009, survey, auditors assessed only 14 per cent of authorities as on track to deliver IFRS financial statements compliant with IAS 17 for 2010/11. Twenty-seven per cent were assessed as having major issues and 59 per cent with minor issues.
- Authorities need to have a detailed plan to ensure they identify all arrangements falling under IAS 17 and that they account for such arrangements correctly. This briefing paper sets out some the key issues and practical examples that authorities should consider as part of their work on the review of lease arrangements.

Countdown to IFRS - Checklist for councillors (17 March 2010)

- From 2010/11 local government will be required to prepare accounts in accordance with international accounting standards (IFRS). A failure to achieve successful transition to IFRS would cause significant reputational damage not only to individual authorities but to the local government sector as a whole.
- 13 Poor preparation will heighten the risk that accounts will not meet requirements and so attract a qualified auditor's opinion or be published late. At a practical level, there is a risk that avoidable additional costs will be incurred if the implementation timetable is not well managed or is allowed to slip. The transition process is a real test of self regulation by local government.
- 14 The audit committee (or its equivalent) needs to be sufficiently aware of the requirements of IFRS to ensure the transition project is on track. In order to help members discuss their IFRS transition plan with relevant officers we have set out a number of suggested questions.

Countdown to IFRS: Accounting for non-current assets (17 May 2010)

The latest in our series of technical briefing papers considers the detailed accounting requirements and the potential issues arising from introducing international financial reporting standards (IFRS) for Accounting for non-current assets, formerly referred to as fixed assets.

International Financial Reporting Standards

- 16 Accounting for non-current assets considers the following issues:
 - potential reclassification implications (IFRS 5 and IAS 40);
 - valuation of property, plant and equipment (IAS16);
 - componentisation (IAS16);
 - impairment of assets (IAS36);
 - intangible assets (IAS38); and
 - government and non-government grants (IAS20).
- 17 Practical examples to help explain potential issues local government bodies may experience when implementing the standards have been provided.
- 18 You can visit www.audit-commission.gov.uk/IFRS for more information about IFRS and implementation work.

Recent Audit Commission publications

19 The Audit Commission produces a regular Councillors' Update. This e-mailed newsletter aims to keep councillors up to date with the Commission's current work, such as national reports and studies. News stories containing details of specific tools and case studies will direct councillors to information that they can use in their work. If you have not automatically received your copy of Councillors' Update, please subscribe via the following link:

Councillor Update newsletter - Audit Commission

Scale of fees for the audit of local government pension funds - 2009/10 and 2010/11 (25 May 2010)

20 In October 2009 the Audit Commission announced a review of the costs of auditing local government pension funds, based on the first separate audits in 2008/09. We've now completed this review and the Commission's Board has approved a new scale fee formula to be applied to pension fund audits.

Doncaster Metropolitan Borough Council: Corporate Governance Inspection (19 April 2010)

- 21 The Audit Commission carried out this inspection because of repeated evidence, over more than 15 years, that the council is not well run.
- 22 The report says that 'The Council is failing in its legal obligation to make arrangements to secure continuous improvement in the way in which it exercises its functions, having regard to a combination of economy, efficiency and effectiveness.'
- 23 There are three inter-related issues which mean that Doncaster Metropolitan Borough Council is failing in its legal duty to make arrangements to secure continuous improvement in the exercise of its functions. These three issues are individually divisive and collectively fatal to good governance, each serving to compound and magnify the negative impacts of the others. These issues also mean the Council lacks the capacity or capability to improve in the next 12 months.
- 24 The three issues are as follows.
 - The way the Council operates to frustrate what the Mayor and Cabinet seek to do.
 - The lack of effective leadership shown by the Mayor and Cabinet.
 - The lack of leadership displayed by some chief officers, and the way they have all been unable to work effectively together to improve services.
- 25 The report recommends that the Secretary of State should exercise his powers under section 15 of the Local Government Act 1999 to give a Direction or Directions to Doncaster Metropolitan Borough Council to address the deep-seated culture of poor governance identified by our inspection. Recommendations in the report include:

Recent Audit Commission publications

- the behaviour of the Mayor and some key councillors is no longer allowed to obstruct the proper governance of the council;
- the role of the Mayor and Cabinet as the Executive is properly supported by officers, and the Overview and Scrutiny function ceases to operate as if it were an alternative Executive function;
- bullying and intimidating behaviour is eliminated;
- there is a rapid improvement in the performance of key services;
- the Council plays an effective role in working with external partners to improve the prospects for the people of Doncaster;
- a high calibre Chief Executive who commands the respect of the Mayor and the Council is in place; and
- under the leadership of a new Chief Executive, the chief officers work collectively to deliver service improvement.

Tenant involvement (31 March 2010)

- This discussion paper is the result of the first joint research project between the Audit Commission and the Tenant Services Authority (TSA). The project set out to assess the progress of social landlords in involving their tenants and to highlight the similarities and differences in approaches across the sector.
- 27 The results of the research are also being used by the TSA and the Audit Commission to develop our approaches to national and local standards and inspection.
- 28 This paper provides a snapshot of progress on tenant involvement and identifies the key challenges for social landlords in engaging with their tenants under co-regulation. It is intended to stimulate discussion in the sector and to provide information and good practice examples for policy makers, landlords and tenants.
- 29 This paper provides a snapshot of progress on tenant involvement and identifies the key challenges for social landlords in engaging with their tenants under co-regulation. It is intended to stimulate discussion in the sector and to provide information and good practice examples for policy makers, landlords and tenants.
- 30 The paper has five main parts that:
 - explain the role of tenant involvement in social housing;
 - discuss the language of empowerment;
 - describe what tenants want from their landlords;
 - assess the progress landlords have made since 2004; and
 - consider the impact of the regulatory changes.

National Fraud Initiative report 2008/09 (20 May 2010)

The National Fraud Initiative (NFI), the UK-wide antifraud programme, helped trace £215 million in fraud, error and overpayments in 2008/09. Since the initiative's start in 1996, the programme has helped detect £664 million.

The NFI is a data matching exercise. It compares information held by and between around 1,300 organisations including councils, the police, hospitals and nearly 100 private companies. This helps to identify potentially fraudulent claims, errors and overpayments, all hosted on a secure website. When there is a match, there may be something that warrants investigation. For example, when data matching shows a person listed as dead and also in receipt of a pension, the relevant body will investigate and, if appropriate, stop pension payments.

By mutual agreement (16 March 2010)

- 33 The study looked at council chief executives' job moves over 33 months, and found that:
 - agreed severance packages for 37 council chief executives totalled £9.5 million, 40 per cent of which was in pension benefits;
 - three in every ten outgoing council chief executives received a pay-off;
 - only six took up other senior council jobs within a year;
 - one in seven single tier or county councils had paid off a chief executive, and this rate seems to be growing; and
 - the average cost to councils of each severance package was almost double the annual basic salary, but in four cases was more than triple.
- 34 Severance deals can be in the interests of the council and the taxpayer. But our research shows that not all such deals are justified, that competent chief executives have sometimes lost their jobs needlessly, and that less effective individuals have been paid-off rather than dismissed.
- 35 The Commission wants all deals to be more transparent. They should be reviewed by scrutiny or remuneration committees, with details published shortly after they are agreed. And councils should consider whether to include so-called 'pre-nuptial' clauses in contracts, specifying the grounds and payment for severance.
- 36 The report found that rapid re-employment in local government is unusual only six out of the 37 returned to a senior council post within a year, and over 80 per cent have yet to return to local government. However, a way should also be found of recouping some of a pay-off where an executive moves quickly into another top council job.
- In the interests of openness and transparency, the Audit Commission is making submissions received, following our call for evidence, for the By Mutual Agreement: Severance payments to council chief executives study available. These can be viewed below. A copy of responses will also be placed in the House of Commons library.

Under Pressure: Tackling the financial challenge for councils of an ageing population (18 February 2010)

38 Councils face the challenge of an ageing population as public spending reduces. This report says most councils do not know enough about the costs of their ageing population. They may also miss the savings that could flow from preventive services and better work with other organisations.

Appendix 1 – Key Deliverables 2009/10

Table 1 Progress on Key Deliverables for 2009/10

	I	
Product	Timing	Current position
Planning		
Audit Plan	January 2009- March 2009	Plan presented to Audit Committee in June 2009
Opinion		
Work on financial systems	December 2009 –	This is in progress.
	June 2010	We have completed out Opinion plan and presented to Audit Committee in March 2010
Financial statements; opinion;	July - September 2010	
 Annual Governance Report; and 		
opinion memorandum		
Use of Resources		
Health Inequalities		
phase 1	May 2010	Phase 1 completed and report
phase 2	October 2010	issued. Phase 2 nearing completion.
Performance management follow up	June 2009 to December 2009	Review completed, we are in the process of agreeing the report with officers
HR follow up	December 2009 to February 2010	Review completed, and report presented to Audit Committee in March 2010
Project management review	January 2009 to March 2010	In progress

Product	Timing	Current position
Value for money conclusion	June 2010 to September 2010	We will consider the work done under Use of resources and local projects to issue our conclusion
Use of resource judgements	February to July 2010	This work has been stopped based on the new government's direction

Appendix 2 – Key deliverables 2010/11

Table 2 Progress on Key Deliverables for 2010/11

Product	Timing	Current position
Planning		
Audit Plan	January 2010- March 2010	Plan presented to Audit Committee in June 2010
Opinion		
Work on financial systems	December 2010 – June 2011	
Financial statements;	July - September 2011	
Use of Resources		
Building schools for the future		
Project management review		
Value for money conclusion	June 2011 to September 2011	
Use of resource judgements	February to July 2011	This is no longer applicable. We will update the Committee once more information becomes available
Reporting		
Annual Audit and Inspection Letter	December 2011	

Appendix 3 – Audit Commission letter regarding CAA

28 May 2010

Chief Executives All English Single Tier and County Councils Direct line Email

0844 798 2467 g-davies@auditcommission.gov.uk

Dear Colleague,

I am writing on behalf of the CAA inspectorates to let you know how we propose to bring work on CAA to a conclusion in the light of the new government's recent announcement.

All work on updating the area assessment and organisational assessment will cease with immediate effect. These assessments on the Oneplace website will not now be updated. We will not be reporting new red or green flags in the area assessment nor updating the text around existing flags.

We will not be issuing new scores for the use of resources assessments, the managing performance assessments or the overall organisational assessments.

Ofsted has a statutory obligation to carry out an annual assessment of children's services. Pending any further decisions Ofsted will continue with the children's services assessment for 2010.

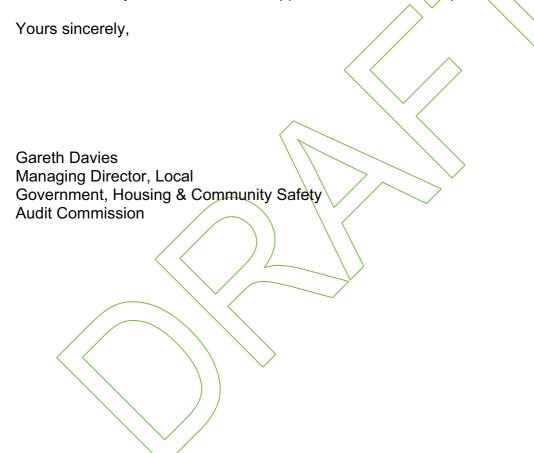
The Care Quality Commission is currently considering the implications of the ending of CAA for its assessment of adult social care with the Department of Health. They will also discuss the matter with the Association of Directors of Adult Social Services and communicate with councils as soon as this is finalised.

Your appointed auditor will continue to deliver the audit in line with the statutory Code of Audit Practice under which they are required to give a value for money conclusion alongside their opinion on the financial statements. Auditors will need to complete such work as they consider necessary to enable them to give this conclusion, but in practice we envisage they will be able to discharge this responsibility using work completed to date for the use of resources assessment. Your auditor will report any significant findings in the annual audit letter but will not be reporting a score for the use of resources.

We have already announced that we are reviewing the approach that auditors will take in future to the value for money conclusion from 2010/11.

We are in discussions with the government, the LGA and other representative bodies about the future approach to inspection. In the meantime, the Audit Commission will continue with the limited programme of risk-based inspections currently underway. Other inspectorates will continue with their standalone inspection programmes. We will inform you of any developments in our approach as soon as they have been agreed.

Your CAA Lead and appointed auditor will of course be available to discuss the practical implications of these changes. You can also phone our helpline on 08450 522616. I would like to thank you for your cooperation with our staff over the short life of CAA. We will of course consult you about the future approach to audit and inspection.



The Audit Commission

The Audit Commission is an independent watchdog, driving economy, efficiency and effectiveness in local public services to deliver better outcomes for everyone.

Our work across local government, health, housing, community safety and fire and rescue services means that we have a unique perspective. We promote value for money for taxpayers, auditing the £200 billion spent by 11,000 local public bodies.

As a force for improvement, we work in partnership to assess local public services and make practical recommendations for promoting a better quality of life for local people.

Copies of this report

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www.audit-commission.gov.uk

Performance Management

Follow up

Brent London Borough Council

Audit 2009/10

March 2010





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Status of our reports

The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors/ members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.

Introduction and background

Introduction

The Audit Commission carried out a performance management review in 2008. This looked at several areas of performance management and included a follow up of an earlier review of partnership working. This high-level review follows up on the recommendations made in the report on performance management and assesses what progress has been made in completing them.

Background.

- 2 The performance management review in 2008 focused on:
 - the clarity of the Council's priorities and the means by which they are translated into meaningful targets for officers;
 - the use of trend analysis and benchmarking;
 - the progress on providing the IT infrastructure to support the performance management framework;
 - officers' understanding and adherence to data protection principles; and
 - partnership performance management arrangements.
- 3 The previous review concluded that the Council's priorities were clear. It found that good use was being made of service plans and appraisal processes to support the delivery of Council priorities. Trend analysis and benchmarking was being used adequately to deliver service improvements in the specific service areas probed. Data protection principles were understood, addressed and the Council's arrangements for meeting Data Protection requirements were found to be adequate.
- 4 As part of the process of assessing performance management, the review considered how well the Council was using the findings of its staff surveys. The staff survey had raised several issues that the Council had responded to with an action plan. The review recommended regularly reporting the progress of this action plan to the Performance and Finance committee.
- The previous review also found that good progress had been made to implement Performance Plus the IT system used by the Council to support its performance management framework. However it found that some users, such as staff from Housing were spending more time than under the previous system, producing performance management reports. A recommendation was made to provide support for Housing staff to produce these reports.

- 6 The review also explored what progress had been made to implement a previous year's review of the performance management arrangements of partnerships. It found that while some work had taken place the recommendation to:
 - develop a register of current partnerships and map the reporting and delegation arrangements for each partnership to ensure the Council has up-to-date information about its involvement in partnerships had not been sufficiently addressed. This led to a further recommendation to develop a process for keeping the partnership register up to date.

Objectives and audit approach

Objectives

- 7 The key objective of this review was to follow up on the recommendations made in the performance management report of 2008 which were to:
 - regularly report progress against the staff survey 2007/08 action plan to Performance and Finance Committee;
 - provide support to housing staff to reduce the time taken to produce performance reports; and
 - develop a process that keeps the corporate partnership register up-to-date.

Audit approach

- 8 The audit approach included:
 - a review of relevant documentation; and
 - Interviews with key staff.

Main conclusions

- 9 Good progress has been made to implement all the recommendations of the previous review with specific actions taken to improve systems and processes. The staff survey action plan has been subject to review by the Performance and Finance Committee and senior managers have pledged to address issues raised by staff. The performance management system is fit for purpose The IT system, Performance Plus, which supports the performance management system, has been updated to improve the user experience in relation to inputting data for housing staff A clear system is in place to update the partnership register but further refinements are suggested to improve the accessibility of the register.
- 10 The recommendation to keep members informed about the results of the staff attitude survey has been met. Progress against the 2007/08 staff survey action plan was presented to the Performance and Finance Committee in February 2009. The report to members outlined the actions taken which covered health and safety, working conditions, communication and leadership, change management, bullying and harassment, work-life balance, professional development and appraisal. The report highlighted improvements achieved.
- 11 The 2008/09 survey results were presented to the Performance and Finance Committee in September 2009. The report presented highlighted the main findings and provides some comparisons with results from the 2007/08 survey. In response to concerns about whether the findings of staff survey will be addressed, the Council has produced a pledge statement which identifies the issue of concern and what action is being taken to address this. The involvement of Members in monitoring progress in addressing the issues raised in the staff attitude survey, encourages service areas to address areas of concern and improve the experience of staff.
- 12 Some progress has been made to implement the recommendation to provide support to housing staff. This is to reduce the time taken to produce performance reports. Improvements have been made to the functionality of Performance Plus such as the introduction of a new front page with hyperlinks to the relevant sections. This has resulted in increased user satisfaction among Housing users and increased the speed at which information in loaded on to the system.
- 13 While there have been improvements to the functionality to enter data, the reports that Performance Plus produces do not fully meet the requirements of housing department users. This means the information in the Performance Plus reports still have to be transferred into a word document to better meet the needs of housing managers. The reporting limitations of Performance Plus for housing have been fed back to the supplier. The Council expects a more updated version of the package from the supplier to be available shortly which is hoped will mean more user- friendly reports produced resulting in improved efficiency.
- 14 Progress has been made to implement the recommendation to develop a process that keeps the corporate partnership register up-to-date. A clear process is now in place to update the partnership register. This takes place annually by a policy officer in the policy team. This process is set out in the Partnership Working Guidance document.

Main conclusions

15 However one area of inconsistency is in relation to partners' ability to access the register. The Partnership Working Guidance document says that the register is an on-line access point for basic information about the borough's partnerships. The document says that the register can be viewed by partners. However currently the register is not directly accessible to partners although the LSP has been told about its existence and can access the register by requesting it from the policy team. One of the functions of the register is to allow the Local Public Services Board (LPSB) to monitor and evaluate Partners for Brent involvement in partnership working and identify potential risks. Given this, the Council should consider providing additional alternative forms of access for LSP members.

Recommendation

R1 Make available partnership information on-line as outlined in the partnership working guidance.

Brent London Borough Council

Appendix 1 – Action plan

Page no.	OL OL	Page Recommendation no.	Priority 1 = Low 2 = Med 3 = High	Responsibility Agreed Comments	Agreed	Comments	Date
7	2	R1 Make available partnership information	2	Cathy Tyson	Yes	Will incorporate information on partnership sub	May 2010
		on-line as outlined in the partnership				groups and related activity on LSP website.	
		working guidance					

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20 April 2010

Mr Gareth Daniel
Chief Executive
London Borough of Brent
Brent Town Hall
Forty Lane
Wembley
Middlesex
HA9 9HD

Direct line Email 0844 798 5784 <u>a-white@audit-</u> commission.gov.uk

Dear Gareth

Annual audit fee 2010/11

Further to our discussions, I am writing to confirm the audit work that we propose to undertake for the 2010/11 financial year at London Borough of Brent. The fee:

- is based on the risk-based approach to audit planning as set out in the Code of Audit Practice and work mandated by the Audit Commission for 2010/11; and
- reflects only the audit element of our work, excluding any inspection and assessment fees. Your Audit Commission Comprehensive Area Assessment Lead will be writing to you separately on inspection fees.

As I have not yet completed my audit for 2009/10 the audit planning process for 2010/11, including the risk assessment will continue as the year progresses and fees will be reviewed and updated as necessary.

The total indicative fee for the audit for 2010/11 is for £488,000, which compares to the planned fee of £470,000 for 2009/10. A summary of this is shown in the table below.

Audit fee

Audit area	Planned fee 2010/11	Actual fee 2009/10*
	£	£
Financial statements	315,500	293,000
Use of Resources/VFM Conclusion [including risk based work]	159,000	164,000
WGA	13,500	13,000
Total audit fee	488,000	470,000
Certification of claims and returns	95,000	95,000

^{* =} The actual fee for 2009/10 is based on the 2009/10 planned fee including subsequent changes

The Audit Commission has published its work programme and scales of fees 2010/11. The scale fee for London Borough of Brent is £451,600. The fee proposed for 2010/11 is 8 per cent above the scale fee and is within the normal level of variation specified by the Commission. The variation to scale fee is largely due to the Council's highly devolved financial systems.

The increase in fee for the financial statements element of the audit reflects the costs of additional audit work arising from the introduction of International Financial Reporting Standards. Changes in international auditing standards will increase the audit procedures I need to carry out, however the Audit Commission will absorb the cost of the additional requirements within the fee.

In setting the fee at this level, I have assumed that the general level of risk in relation to the audit of the financial statements is not significantly different from that identified to 2009/10. A separate opinion plan for the audit of the financial statements will be issued in March 2011. This will detail the risks identified, planned audit procedures and any changes in fee. If I need to make any significant amendments to the audit fee during the course of the audit, I will first discuss this with the Director of Finance and then prepare a report outlining the reasons why the fee needs to change for discussion with the audit committee.

My use of resources assessments will be based upon the evidence from three themes:

- Managing finances;
- Governing the business; and
- Managing resources.

The key lines of enquiry specified for the assessment are set out in the Audit Commission's work programme and scales of fees 2010/11. My work on use of resources informs my 2010/11 value for money conclusion. However, I have identified a number of significant risks in relation to my value for money conclusion. For each risk, I consider the arrangements put in place by the Council to mitigate the risk, and plan my work accordingly.

My initial risk assessment is shown in the table below:

Risk	Planned work	Timing of work
Improvement and Efficiency Programme The Council will be in year 2 of delivering individual projects, which constitute the Efficiency programme. This is pivotal to the Councils success in dealing with pressures on public sector finance while delivering a good service to its local population.	We will review the arrangements in place to ensure delivery and governance of the Efficiency programme. This will include a review of the progress made by the new programme management office.	April 2010 – March 2011
Building Schools for the Future (BSF) The Council aims to obtain significant funding (up to £85 million for the first tranche) from the Building Schools for the Future programme. This funding is critical to the long term achievement of the Council's vision for education.	We will review the arrangements in place to ensure the delivery, governance and value for money to be achieved through the BSF scheme.	Sept 2010 – March 2011
Economic downturn The economic downturn presents a risk to all local authorities. The impact is likely to include reductions in capital receipts, reductions in income from fees, and increased costs for some services such as housing benefits. Alongside reduced government funding, there is a risk to financial standing.	We will monitor the impact of the economic downturn on Council finances and take account of the Council's responses to the economic downturn in reaching our conclusions on use of resources.	January 2011 – July 2011

International Financial Reporting Standards

The move to International Financial Reporting Standards presents risks to financial reporting, both in terms of managing the transition and the potential impact on budgets and capital financing.

We will continue with regular liaison with the finance team to support the Council with this change, and perform early testing where agreed.

April 2010 – September 2011

I will issue separate project specifications for the reviews before beginning the work.

I will issue a number of reports relating to my work over the course of the audit. These are listed at Appendix 1.

The above fee excludes any work the Commission may agree to undertake using its advice and assistance powers. Each piece of work will be separately negotiated and a detailed project specification agreed with you.

The key members of the audit team for the 2010/11 are:

Senior Audit Manager – Paul Viljoen 0844 798 2688 Audit Manager – Gary Mcleod 0844 798 5773

I am committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact me in the first instance. Alternatively you may wish to contact the London Region Head of Operations, Les Kidner at l-kidner@audit-commission.gov.uk.

Yours sincerely

Andrea White District Auditor

cc Duncan McLeod - Director of Finance Councillor Cummins - Chair of the Audit Committee

Appendix 1: Planned outputs

Our reports will be discussed and agreed with the appropriate officers before being issued to the audit committee.

Table 1

Planned output	Indicative date
Opinion Audit plan	March 2010
Interim audit memorandum	May 2011
Annual governance report	September 2011
Auditor's report giving the opinion on the financial statements and value for money conclusion	September 2011
Use of resources report	October 2011
Final accounts memorandum (to the Director of Finance)	October 2011
Annual audit letter	November 2011
Grants report	January 2012
Project reports	
Efficiency Programme	March 2012 - report
Building schools for the future	March 2012 - report

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Audit Committee 15 June 2010

Report from the Director of Finance and Corporate Resources

For Information

Wards affected: ALL

National Fraud Initiative

1. Summary

1.1. This report provides details of the Audit Commission's National Fraud Initiative (NFI) and summarises the council's work in relation to the 2008/09 exercise.

2. Recommendations

2.1. The Audit Committee note the content of the report.

3. Detail

- 3.1. Since 1996 the Audit Commission has used its statutory powers to obtain data from local authorities and, more recently, other public and some private sector organisations. It has matched data within and between organisations in order to identify potential fraud. The exercise is run every two years and, since inception, has grown in size in terms of the data sets obtained and the organisations who take part.
- 3.2. The origins of this exercise began in 1994 with a London pilot, sponsored by the Society of London Treasurers, which matched housing benefit (HB) to student award data to identify students who were fraudulently claiming HB. The exercise identified £300,000 of fraud and provided proof of concept for a national data matching exercise.
- 3.3. The latest exercise draws on data collected mostly in October 2008 but also in 2009 and includes the following matches:
 - Pensions payments checked to records of deceased people.
 - Housing benefit payments to payroll records across and within organisations.
 - Payroll records to failed asylum seeker and expired visa records.
 - Blue badge & other adult social care records to records of deceased people.

- Housing benefit payments to housing tenancy records.
- · Council tax records to electoral register.
- Payroll records to other payroll records.
- 3.4. The majority of results from the exercise were received in February 2009 with other matches received later in the year. The council received some 31,500 although 17,700 of these relate to creditor matches designed to find duplicate creditor names and duplicate payments. This volume of matches is mainly caused by having devolved data for creditors split across a number of departments rather than having a single payments system. The matches are unlikely to relate to irregularity or fraud. The remaining 13,800 matches were split across some 130 different reports within the following categories:

Match	Number matches
Housing Benefit to various	6,964
Payroll and Pensions to various	868
Housing Rent to various	207
Blue Badge / Travel Concessions to deceased	1,044
Residential Care to Deceased	61
Insurance Claimants to various	117
Temporary Accomodation to various	694
Payroll to companies house	248
Council Tax SPD to Electoral Register	3,665
Total	13,868

- 3.5. The Audit and Investigations Team are responsible for handling the output of the National Fraud Initiative. This is done within existing resources. It is clearly impossible to investigate every match and the Audit Commission supply some recommended priority areas. The Audit and Investigation Team also undertake their own filtering to weed out spurious matches and those unlikely to produce an outcome. This vetting is based on previous experience and also involves some sample checking of each report to establish the quality of the data match. Where serious fraud is suspected the team commence an investigation. Alternatively, matches are passed to other parts of the organisation to deal with as an administrative function.
- 3.6. After filtering the various reports, the Audit and Investigations Unit checked just over 600 matches. Of these 446 have been cleared as requiring no further action, 82 are the subject of further checks/enquiries and 59 have been included in the unit's caseload. 21 investigations have been concluded as either fraud (8) or overpayment/error (13). More than 150 enquiries were received from and over 200 enquiries made to, other organisations participating in the exercise. Of the matches checked 300 related to Housing Benefit and 50 to staff employed by the Council.

- 3.7. In addition to significant additions made to the Authority's Council Tax base, as discussed in paragraph 3.9 below, overpayments due to fraud and error of £115,000 have been identified from matches investigated. The majority of this sum relates to Housing Benefit and it is anticipated the figure will rise considerably once investigations are completed. Of the investigations where an overpayment has been calculated, two relate to the failure to declare a Private Pension and the overpayments total £50,000.
- 3.8. With regard to matches concerning employees, 39 required no further action, 10 are the subject of further enquiries/checks, 3 have concluded with the member of staff resigning, (one of which led to an investigation of another member of staff who also resigned).
- 3.9. Signinficant success has been achieved in relation to the Single Parent Discount (SPD) to Electoral Register Match. The data match compared SPD claimants with information submitted for electoral registration purposes to identify those in receipt of SPD who were shown as having other adults present in the household. The council received some 3,600 matches, representing almost 10% of all SPD claimants. These matches were received in June 2009.
- 3.10. In order to deal with this volume of matches the Audit and Investigation Team piloted two separate approaches before recommending how the remaining matches should be dealt with by Revenues and Benefits. A sample of high banded properties with long SPD periods were selected for visits, with lower banded properties targeted for mail enquiries. The intention was to investigate a sample of cases to prosecution standard where there was significant and deliberate fraud, with other minor cases being dealt with by way of recovery.
- 3.11. The first phase of the exercise generated some £180,000 in cancelled SPD and showed that whilst unannounced visits were more effective than letters, the costs were higher, involving two staff. The exercise was passed to the Revenues and Benefits Service in January 2010 who have continued to deal with the matches by letter. In total, some £830,000 in additional council tax debit has been raised for years up to and including 2009/10. Some £385,000 related to 2009/10 debit and this increased tax base will roll forward into future years. In excess of £230,000 has already been recovered. Two cases are with the council's legal service for prosecution.
- 3.12. The Audit and Investigation Team also checked whether any employees were on the SPD list. Members will be aware that employees who wilfully avoid paying their council tax or commit fraud against the council are in breach of the council's Code of Conduct for Employees. A total of 100 staff were identified within the matches and of these 18 had their SPD removed. Following more detailed investigations into those earning in excess of £25,000 six SPDs were cancelled and there was one dismissal, one resignation, one suspension (other matters having come to light), one is still under review and for two it was determined disciplinary action was not necessary.

- 3.13. The Audit Commission's own report¹ on the NFI 2008 exercise makes eight recommendations for Local Government. Briefly these are:
 - (i) Data is submitted on time
 - (ii) Authorities prioritise and follow up matches
 - (iii) Promote awareness of the NFI among Senior managers of all departments
 - (iv) Engage elected members more effectively
 - (v) Ensure that the NFI is integral to Corporate Anti fraud measures
 - (vi) Improve expertise on immigration fraud
 - (vii) Recover previous years discounts on the Single person Discount matches
 - (viii) Improve communications between departments on Deceased Persons
- 3.14. The majority of these recommendations are already met by the council. This report seeks to partly address point iv. A briefing for members has also been produced by the commission and is available on their website².

4. Financial Implications

4.1. The work undertaken on the Single Person Discount has had a significant positive benefit on the Council's financial position. This is set out in the body of the report.

5. Legal Implications

- 5.1. None
- 6. Diversity Implications
- 6.1. None

7. Background Papers

- 1. Audit Commission (2010). *The National Fraud Initiative 2008/09. National Report, May 2010.* Retrieved on 1st June 2010 from: http://www.audit-commission.gov.uk/SiteCollectionDocuments/Downloads/10_0084_NationalFraudInitative Report WEB2.pdf
- 2. Audit Commission (2010). *The National Fraud Initiative 2008/09. Member's Briefing, May 2010.* Retrieved on 27th May 2010 from http://www.audit-commission.gov.uk/SiteCollectionDocuments/Downloads/nfi0809members-briefing.pdf

8. Contact Officer Details

Simon Lane, Head of Audit & Investigations, Room 1, Town Hall Annexe. Telephone – 020 8937 1260

DUNCAN McLEOD
Director of Finance and Corporate Resources

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Audit Committee 15 June 2010

Report from the Director of Finance and Corporate Resources

For Information Wards affected:

Final Internal Audit Progress Report 2009/10

1. Summary

1.1. This report summarises the work of Internal Audit for 2009/10 and provides an update on progress since the previous report to this Committee on 3rd March 2010.

2. Recommendations

2.1. That the Audit Committee notes the progress made in achieving the 2009/10 Internal Audit Plan.

3. Detail

- 3.1. The Internal Audit Plan for 2009/10 comprised 1211 days, of which 951 were allocated to Deloitte Touche Public Sector Internal Audit Limited, and 260 to the in-house team. Of the total, 45 days were brought forward from 2008/09 to assist with the completion of Financial Management Standard in Schools (FMSiS) assessments in primary schools, as previously agreed with the Committee.
- 3.2. A total of 1152 days have been delivered against the overall Plan, made up of 902 Deloitte PSIA days and 250 in-house days. This represents 95% of the Plan.
- 3.3. In total, 59 days are being carried forward into the 2010/11 year. These primarily relate to the audit and FMSiS assessments for two Foundation schools and also work in relation to the Adult Social Care Transformation Programme. These schools were added to the plan mid-year following the decision that Internal Audit would be responsible for undertaking this work although were deferred at the request of Education Finance
- 3.4. With regard to the work around the Adult Social Care Transformation

Programme, some days were delivered in relation to the Re-ablement workstream. However, the Assistant Director, Quality & Support, requested that Self Directed Support (SDS) and Direct Payments be deferred until April/May 2010 That is now underway as part of the 2010/11 Plan. Work in relation to the integration with Central & North West London Mental Health Trust was also postponed. Consideration was given to whether the days assigned to these audits could be used to undertake alternative work. Some additional work was identified through discussions with management regarding new or emerging risk areas. The balance has then been carried forward.

- 3.5. Of the 33 Final Reports issued during 2009/10, for which an Assurance Report was due, there were 19 (58%) 'Substantial' assurance opinions and 14 (42%) 'Limited' assurance opinions. This does not include the Brent Housing Partnership (BHP) final reports as these are reported separately to the BHP Audit & Finance Sub-Committee.
- 3.6. With regards to schools and the FMSiS assessments undertaken, 22 schools were assessed as having achieved the standard during 2009/10; 7 had achieved a 'Conditional Pass' and 1 school a 'Fail'. Members are reminded that schools achieving a 'Conditional Pass' are given 20 working days as per DCSF guidance, in order to address any gaps identified in the initial assessment. Evidence of this is required to be provided to Internal Audit prior to this being upgraded to a full 'Pass'.
- 3.7. In total, 50 (41 Council and 9 BHP) Final Reports (excluding reports for schools) have been issued as part of the 2009/10 Internal Audit Plan. A summary report setting out completed audit work is attached as Appendix 1.
- 3.8. With regard to the follow-up of recommendations raised and agreed by management, a more structured programme was introduced in 2008/09, as reported to Committee. Under the revised approach, management are responsible for completing a self assessment of the status of implementation of each of the recommendations originally raised, flowing the passing of agreed deadlines for implementation. Where management indicate that recommendations have been implemented, then a meeting is arranged to verify this, following which a report is issued. If the recommendations have not been fully implemented, either through verification or as indicated by management in their self assessment, then, as was previously the case, further actions are identified as necessary and revised deadlines for completion will be agreed with management. In all cases, where recommendations have not been fully implemented, the further actions will continue to be followed-up until the point at which full implementation is confirmed.

4. Financial Implications

4.1. None

5. Legal Implications

5.1. None

6. Diversity Implications

6.1. None

7. Background Papers

1. Report from the Director of Finance – Internal Audit Plan for 2009/10, Audit Committee – 3rd March 2009.

8. Contact Officer Details

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DUNCAN McLEOD
Director of Finance and Corporate Resources

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Internal Audit Year-End Progress Report 2009/10 London Borough of Brent June 2010

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Executive Summary

Introduction

This report sets out a summary of the work completed against the 2009/10 Internal Audit Plan.

The report provides a summary of the main findings from each audit, together with the assurance ratings for each one. Please note that this summary and assurance rating is only reported on once the individual audit reports have been finalised. In a small number of cases there are audits still at Draft Report stage. We have included these within this report and will update the Committee within our 2010/11 Progress Reports once these have been finalised.

Appendix B sets out the full year's Plan, as agreed by the Committee in March 2009, together with an indication of delivery against this.

Summary of progress against the Plan

The overall Internal Audit Plan for 2009/10 comprised 1,211 days, of which 951 were allocated to Deloitte & Touche Public Sector Internal Audit Limited (Deloitte PSIA), and 260 to the in-house team. Of the total, 45 days were brought forward from 2008/09 to assist with the completion of Financial Management Standard in Schools (FMSiS) assessments in the primary schools, as previously agreed with the Committee.

A total of 1152 days have been delivered against the overall Plan, made up of 902 Deloitte PSIA days and 250 in-house days. This represents 95% of the Plan.

In total, 59 days are being carried forward into the 2010/11 year. These primarily relate to the audit and FMSiS assessments for two Foundation schools and also work in relation to the Adult Social Care Transformation Programme. These schools were added to the plan mid-year following the decision that Internal Audit would be responsible for undertaking this work. However, Education Finance requested a deferral for these two particular schools. With regards to the work around the Adult Social Care Transformation Programme, some days were delivered in relation to the Re-ablement workstream. However, the Assistant Director, Quality & Support, requested that Self Directed Support (SDS) and Direct Payments be deferred until April/May 2010 That is now underway as part of the 2010/11 Plan. Work in relation to the integration with Central & North West London Mental Health Trust was also postponed. Consideration was given to whether the days assigned to these audits could be used to undertake alternative work. Some additional work was identified through discussions with management regarding new or emerging risk areas. The balance has then been carried forward.

Summary of Work Undertaken

In addition to the range of standard systems audits undertaken across the Service Areas, our coverage in 2009/10 included significant focus on the schools, as well as a range of IT audits and various non-standard pieces of work.

With regard to schools, as was the case in 2008/09, a significant amount of time was spent during the year undertaking FMSiS assessments in primary schools, in order to progress towards the deadline of having all primary schools assessed by 31 March 2010. In addition, work continued with Education Finance in order to help strengthen common control weaknesses identified as part of the assessments, so as to help ensure that the Council gains the maximum benefit from the perspective of the robustness of the internal controls in operation across the schools. A key area of focus was in relation to budget monitoring. In addition to the primary schools, a further four secondary (Foundation) schools were added into the Plan for a joint audit and FMSiS assessment in March 2010. The remaining secondary schools are being audited and assessed as part of the 2010/11 Plan.

In terms of the various pieces of non-standard work, this included verification work in respect of the Local Area Agreement (LAA) Stretch Targets and the Supporting People Programme (SPP) Grant. Capital based contract audit work was also undertaken with Brent Housing Partnership (BHP) and in relation to the construction of the Civic Centre and the ongoing construction of the ARK Academy. In addition, a number of revenue based contract audits were undertaken in relation to the arrangements for managing key contracts across the Council.

A further stream of work that is continuing into 2010/11, relates to the Finance Modernisation project. An approach was agreed with the Director of Finance & Corporate Resources and the Head of Audit & Investigations, with regards to the Internal Audit review of the control processes being designed by the Project Team. Deloitte PSIA are undertaking the initial review, focusing on the adequacy of the controls set out against key risks. The in-house Audit Manager and the Head of Audit & Investigations are then responsible for reviewing and agreeing the findings from Deloitte PSIA's work, prior to passing reports to the Director and Deputy Director of Finance & Corporate Resources.

Summary of Assurance Opinions and Direction of Travel

For the work finalised against the 2009/10 Internal Audit Plan, a summary of the Assurance Opinions awarded is set out in the table below, together with a comparison to the 2008/09 and 2007/08 financial years. Please note that an Assurance Opinion is not applicable in all cases and we have not included BHP audits within this analysis. Please see page 6 for the definitions of each of these opinions.

	Full		Substantial	Limited	None
2007/08		-	42% (23)	58% (32)	-
2008/09		-	78% (21)	22% (6)	-
2009/10		-	58% (19)	42% (14)	-

In addition, in any cases where an internal audit has been completed against the same scope in a prior year, an assessment of the Direction of Travel is also provided. As shown in the table below, there have been ten Council audits finalised for which such an assessment has been applicable. Six of these have shown an improvement. Please see page 7 for the definitions of the Direction of Travel.

	Improved	Unchanged ←	Deteriorated —
2008/09	8	1	-
2009/10	6	4	-

Overall, there has been a decline in the proportion of Substantial assurance reports compared to that in 2008/09. However, the position is still improved compared to 2007/08. In addition, a key point to note is that there is no decline in the assurance opinions awarded in areas where repeat audits have been undertaken. Wherever an area has been subject to a repeat audit, the Direction of Travel has either indicated an improvement or an unchanged position. Of particular note is that the improved assurances include a number of key financial systems as follows:

- Council Tax moved from Limited to Substantial;
- Payroll moved from Limited to Substantial; and
- Internal Financial Controls (Finance & Corporate Resources) moved from Limited to Substantial.

FMSiS Assessments

The table below summarises the progress made and the outcomes of the assessments completed. Further details are set out on page 20.

	Pass	Conditional Pass	Fail	In progress	Still to be assessed
2007/08	3	-	-	-	-
2008/09	31	1	-	-	-
2009/10	22	7	1	3	1

Members are reminded that a school achieving a 'Conditional Pass' is given 20 working days, as per DCSF guidance, in order to address the gaps identified in the initial assessment. Evidence of this is required to be provided to Internal Audit prior to this being upgraded to a full 'Pass'. For those showing as 'Conditional Pass', we are currently in the process of confirming whether the schools have satisfactorily addressed the further actions required.

It should be noted that one school remains outstanding from 2008/09, for which the final outcome is still being determined.

Follow-Up of Previously Raised Recommendations

With regards to the follow-up of recommendations raised and agreed with management, a more structured programme was introduced in 2008/09, as reported on to the Committee.

Under the revised approach, management are responsible for completing a self assessment of the status of implementation of each of the recommendations originally raised, following the passing of the agreed deadlines for implementation. If management indicate that the recommendations have been implemented, then a meeting is arranged to verify this, following which a report is issued. If it is found that the recommendations have not been fully implemented, either through verification or as indicated by management in their self assessment, then, as was previously the case, further actions are identified as necessary and revised deadlines for completion will be agreed with management.

In all cases, where recommendations have not been fully implemented, the further actions will continue to be followed-up until the point at which full implementation is confirmed. This was also previously the case. However, the follow-up programme is now a rolling one as opposed to being restricted to an individual financial year. On this basis, the recommendations raised as part of a specific audit may be followed-up more than once in a single financial year, as well as potentially being followed-up in the

same financial year to that which the audit was undertaken, if it is relevant to do so, given the agreed implementation deadlines. It is hoped that this will improve both the efficiency of the follow-up process, and the extent to which management recognise the importance of undertaking their own monitoring of the implementation of recommendations.

The rolling programme is now fully in place and recommendations are being followed up with management, as and when the deadlines for implementation pass.

West London Framework

The Heads of Internal Audit from the four boroughs making up the West London Framework have continued to meet with Deloitte on a periodic basis through the Contract Compliance Board (CCB). These meetings are used to discuss general progress as well as to consider specific areas in which cross borough work may be valuable and areas in which joint improvements can be made.

At the end of 2009/10, two pieces of cross borough work were undertaken. One involved the compilation of a summary report on contract management controls across the three boroughs and the other concerned a comparison exercise into the approach to contract and performance managing the ALMO relationships. Both pieces of work are now complete and the reports are being circulated to management.

The Committee will be updated on any specific developments in future meetings, as appropriate.

Customer Satisfaction

In addition to progress against the Plan, a key way in which the performance of Deloitte is monitored is through the issuing of Customer Satisfaction Surveys to auditees following the completion of each piece of work. 17 completed questionnaires were received in relation to the work undertaken by Deloitte in 2009/10. The average for the overall rating on each completed questionnaire is 4.1 out of 5. This is slightly lower that the average overall rating for 2008/09, although in both cases the performance is classified as 'very good'.

The detailed breakdown of this feedback is set out on page 27 this report.

Year	Average Overall Rating
2007/08	3.88
2008/09	4.40
2009/10 (to date)	4.10

Detailed summary of work undertaken

This section sets out a summary of the internal audits and FMSIS assessments undertaken during 2009/10. A summary of the main findings and the Assurance Opinion are only provided for internal audits for which the final report has been issued. Please note that only priority 1 recommendations are detailed, with the number of priority 2 and 3 recommendations raised being noted. Should Members wish to see full reports for any of the audits then these can be provided upon request.

The following tables provide the definitions of the assurance opinions, together with the definitions for recommendation priorities. Please note that these only apply to internal audit work, not to FMSIS assessments. The outcomes of the FMSIS assessments are explained later in this report.

Assurance Opinions

There are four categories by which internal audit assurance is classified. These are:

	Full	There is a sound system of internal control designed to achieve the client's objectives. The control processes tested are being consistently applied.
Substantial		While there is a basically sound system of internal control, there are weaknesses, which put some of the client's objectives at risk.
Substantial	There is evidence that the level of non-compliance with some of the control processes may put some of the client's objectives at risk.	
	Limited	Weaknesses in the system of internal controls are such as to put the client's objectives at risk. The level of non-compliance puts the client's objectives at risk.
	None	Control processes are generally weak leaving the processes/systems open to significant error or abuse. Significant non-compliance with basic control processes leaves the processes/systems open to error or abuse.

The assurance ratings are not comparable with the International Standard on Assurance Engagements (ISAE 3000) issued by the International Audit and Assurance Standards Board and as such the grading of 'Full Assurance' does not imply that there are no risks to the stated objectives.

Direction of Travel

The Direction of Travel assessment provides a comparison between the current assurance opinion and that of any previous internal audit for which the scope and objectives of the work were the same.

\Rightarrow	Improved since the last audit visit. Position of the arrow indicates previous status.
₩	Deteriorated since the last audit visit. Position of the arrow indicates previous status.
\Leftrightarrow	Unchanged since the last audit report.
No arrow	Not previously visited by Internal Audit.

Recommendation Priorities

In order to assist management in using our internal audit reports, recommendations are categorised according to their level of priority as follows:

Priority 1	Major issues for the attention of senior management and the audit committee.
Priority 2	Important issues to be addressed by management in their areas of responsibility.
Priority 3	Minor issues resolved on site with local management.

Summary Table

Where audits are part of the Internal Audit Plan with Brent Housing Partnership (BHP), the Assurance Opinion is indicated for any finalised reports. The summary of findings is not provided as this will / has been reported on separately to the BHP Audit & Finance Sub-Committee.

New audits being reported as final

Audit	Status as at 28 May 2010	Assurance Opinion
Audit Council Tax	 Final Report One priority 1 recommendation was raised as a result of this audit. This was as follows: The process for sample checking the new report of amendments to standing data should be finalised and brought into operation as a matter of priority. As recommended previously in 2008//09, As part of this consideration should be given to sampling items across each type as opposed to undertaking a random 5% sample check across all items. Management should also consider whether the 5% sample level should apply equally to each amendment type, or whether there is a need to focus more on certain types from a risk perspective. 	Assurance Opinion Substantial
	The review of the reports including the sample checks should be evidenced through signing and dating the report, and any follow-up actions taken should be recorded.	
	Four priority 2 and two priority 3 recommendations were also made where changes can be made in order to achieve greater control.	
	All recommendations were accepted for implementation by management.	
	There has been a positive movement in the Direction of Travel, as a Limited assurance was awarded at the time of the last audit.	

Audit	Status as at 28 May 2010	Assurance Opinion
NNDR	Final Report	Substantial
	One priority 1 recommendation was raised as a result of this audit. This was as follows:	
	• The process for sample checking the new report of amendments to standing data should be finalised and brought into operation as a matter of priority.	
	As recommended previously in 2008/09 consideration should be given to sampling items across each type as opposed to undertaking a random 5% sample check across all items. Management should also consider whether the 5% sample level should apply equally to each amendment type, or whether there is a need to focus more on certain types from a risk perspective.	
	The review of the reports including the sample checks should be evidenced through signing and dating the report, and any follow-up actions taken should be recorded.	
	Three priority 2 and two priority 3 recommendations were also made where changes can be made in order to achieve greater control.	
	All recommendations were accepted for implementation by management.	
	There has been no change in the direction of travel compared to our previous audit, for which substantial assurance was also given.	
Payroll	Final Report	
	Two priority 1 recommendations were raised as a result of this audit. These were as follows:	Substantial
	 Management should continue to liaise with Logica regarding the outstanding issues with the functionality of the Interact system and this approach should be used for any new issues or those that are not a priority. 	
	However, for those issues that remain unresolved over a longer period	

Audit	Status as at 28 May 2010	Assurance Opinion
	and are a key priority, management should agree how these issues will be escalated and what action they can and will take in respect of these. It is suggested that Legal are consulted in this process to help ensure the action taken is the most appropriate. Deadlines should be formally agreed with Logica for all outstanding issues	
	and issues escalated in accordance with the contract conditions in the event that these deadlines are not met; and	
	 Management should remind relevant staff of the need to clearly annotate the health check reports and sign the checklist to demonstrate that the checks have been completed in full. 	
	In addition, it is recommended that those responsible for reviewing and authorising health checks should be reminded not to authorise these until they are satisfied that all checks have been completed and reports annotated clearly.	
	It is further recommended that management should review the current approach to reviewing the starters and leavers reports, giving consideration to the need for a 100% check on these, or at least a 100% check on any new starters that have been added by a Payroll officer as opposed to by the Recruitment Team (this would require the reports to specify the system user that added the record). If a decision is made to continue on a sample basis, the size of this should be determined through an acceptance of the risk involved. Management should also consider whether the sample sizes for all other reviews are sufficient on this basis.	
	Three priority 2 recommendations were also made where changes can be made in order to achieve greater control.	
	All recommendations were accepted for implementation by management.	
	There has been a positive movement in the Direction of Travel, as a Limited assurance was awarded at the time of the last audit.	

Audit	Status as at 28 May 2010	Assurance Opinion
Audit Internal Financial Controls – Finance & Corporate Resources	Final Report Two priority one recommendations were raised as a result of this audit. These were as follows: • Up until the point at which the approval of journals can be enforced by the Oracle system via the workflow, management should generate a monthend report from the system of all journals processed. This report should then be subject to senior officer review to confirm the appropriateness and accuracy of the journals processed, evidence of which should be maintained. With regards to the extent of the review, management should consider whether it is necessary for all items to be included, or whether this can be done on a sample basis. Any decision regarding sample sizes should be made on the basis of an assessment of the level of risk exposure that management are willing to accept.; and • Bank reconciliations should be carried out in a timely manner in all cases.	Assurance Opinion Substantial
	The reconciliations should be fully documented and signed off by the preparer, and should evidence senior officer review together with the date of completion. In addition, management should ensure that any unreconciled items are investigated and explanations recorded against these. Where it is determined that unreconciled items do not relate to unpresented cheques, action should be taken to resolve these errors / anomalies.	
	Two priority 2 and one priority 3 recommendations were also made where changes can be made in order to achieve greater control.	
	All recommendations were accepted for implementation by management.	
	There has been a positive movement in the Direction of Travel, as a Limited assurance was awarded at the time of the last audit.	
Contact Point (IT)	Final Report No priority 1 recommendations were raised as a result of this audit. However, we did raise three priority 2 recommendations where changes can	Substantial

Audit	Status as at 28 May 2010	Assurance Opi	nion
	be made in order to achieve greater control. All recommendations were accepted for implementation by management. A Direction of Travel assessment was not applicable as this area had not been audited previously.		
LAGAN CRM Post Implementation Review (IT)	Final Report No priority 1 recommendations were raised as a result of this audit. However, we did raise seven priority 2 and two priority 3 recommendations where changes can be made in order to achieve greater control. All recommendations were accepted for implementation by management. A Direction of Travel assessment was not applicable as this area had not been audited previously.	Substantial	S
Housing Rents (BHP)	To be reported to BHP Finance & Audit Sub-Committee	Substantial	S
Insurance	 2 Priority 1 Recommendations were raised as a result of this audit. These were as follows: Management should develop an Insurance Strategy which is linked to and correlates with the Council's Risk Management Strategy. Once developed, the strategy should be approved by a relevant Committee and / or Executive and made available to all relevant officers. Management should establish a more formal mechanism for the review of insurable risks. A list should be compiled of all of the Council's insurable risks and evidence should be maintained of the annual review of these risks. We raised an additional 10 Priority 2 recommendations 9 of which were accepted for implementation by management. 	Substantial	S

Audit	Status as at 28 May 2010	Assurance Opinio	on
Houses in Multiple Occupation	Final Report We raised no priority 1 recommendations as a result of this audit. We raised 6 priority 2 recommendations all but one of which were accepted for implementation by management.	Substantial	S
Internal Financial Controls – Business Transformation	 Final Report Three priority 1 recommendations were raised as a result of this audit. These were as follows: Up until the point at which the automated workflow for journals is switched on, management should generate a month-end report from the system of all journals processed. This report should then be subject to senior officer review to confirm the appropriateness and accuracy of the journals processed, evidence of which should be maintained. With regards to the extent of the review, management should consider whether it is necessary for all items to be included, or whether this can be done on a sample basis. Any decision regarding sample sizes should be made on the basis of an assessment of the level of risk exposure that management are willing to accept. The monthly bank reconciliation process should be resumed as a matter of priority when the issues arising from the data migration are resolved. The reconciliations should be fully documented and signed off by the preparer, and should evidence senior officer review, together with the date of completion. In addition, management should ensure that any unreconciled items are investigated and explanations recorded against these. If it is determined that any unreconciled items do not relate to unpresented cheques, action should be taken to resolve these errors / anomalies; and Control account reconciliation process should be resumed as a matter of priority when the issues arising from the data migration are resolved. In addition, the reconciliations should be documented and signed off by the preparer, and should evidence senior officer review, together with the 	Limited	L

Audit	Status as at 28 May 2010	Assurance Opini	on
	date of completion. In addition, any variances identified as part of the reconciliations should be followed-up, annotated and cleared in a timely manner. Three priority 2 recommendations were also made where changes can be made in order to achieve greater control.		
	All recommendations were accepted for implementation by management.		
	Business Transformation as a Service Area have not been audited previously and hence a Direction of Travel assessment is not relevant. However, it is noted that both ITU and OSS have been audited previously as part of Finance & Corporate Resources (F&CR) and Housing respectively. ITU were sampled in 2007/08, at which point a Limited assurance was provided for F&CR, and OSS were audited in 2008/09, at which point a Substantial assurance was provided to Housing.		
Disaster Recovery	Final Report		
Planning Provisions (IT)	One priority 1 recommendation was raised as a result of this internal audit. This was as follows:	Limited	L
	 Formal arrangements for the continuity and recovery of the Council's ICT operations (ICT infrastructure, systems and processes) should be implemented for all systems. These arrangements should be formally documented within a Disaster Recovery Plan (DRP), approved by an appropriate level of management and communicated to the business. 		\bigoplus
	The plan should then be tested on at least an annual basis. Furthermore, the documented arrangements should be periodically reviewed and updated as required.		
	Four priority 2 recommendations were also made where changes can be made in order to achieve greater control.		
	All recommendations were accepted for implementation by management.		
	There has been no change in the direction of travel compared to our previous		

Audit	Status as at 28 May 2010	Assurance Opin	nion
	audit, for which limited assurance was also given. However, the implementation of the twin data centres indicates a significant milestone in ITU's efforts to provide a robust disaster recovery solution.		
iCasework Application –	Final Report		
Support Arrangements	Three priority 1 recommendation were raised as a result of this internal audit. These were as follows:	Limited	L
	 Management should revise the Service Level Agreement with Tagish and consider the inclusion of: 		\Rightarrow
	 Expected service levels; 		
	 Required target response times; and 		
	 Penalty clauses where targets are not met; 		
	 Ownership of the iCasework application should be established at the earliest opportunity. System owners within each business area using the application should be identified to manage the day to day running of the application and the performance of the supplier should be monitored against these service levels; and 		
	 System testing should be undertaken following an upgrade or patch release of the application. Formal test plans should be constructed and followed and test results should also be documented and analysed. 		
	All recommendations were accepted for implementation by management.		
	Based on the partial implementation of recommendations raised in our 2007/08 audit, we indicated a positive movement in the Direction of Travel. However, on the basis of the weaknesses identified, and also due to there being other recommendations still outstanding, the overall Limited opinion was unchanged.		

Audit	Status as at 28 May 2010	Assurance Opi	nion
CRC Energy Efficiency	Final Report		
Scheme	As agreed with the Director of Finance & Corporate Resources, work was added to the Plan in the fourth quarter in respect of the CRC Energy Efficiency Scheme.	N/A	N/A
	This non-standard work involved the facilitation of a workshop with key officers, and additional fieldwork, in order to assist management to determine their readiness for the Scheme.		
	A detailed report was issued to management, including an action plan to be taken forward. An assurance opinion was not relevant at this stage, but a high level summary of the position at the time of the work was as follows:		
	 Management have already undertaken some preparatory work around the impacts of the CRC, however this review should be more systematic, particularly in relation to which bodies, emissions sources and properties Brent will be responsible for in their CRC responsibilities, where the application of detailed regulations can be complex; 		
	Allocation of responsibilities, particularly for data collection and reporting, is a key area; and		
	 There should be additional formalisation of processes due to the increased scrutiny and impact of CRC compared to existing measures, for example NI185 (in the form of fines, allowance purchase requirements and league tables). 		
	Further work is planned during 2010/11 in order to follow-up on the status of progress against the agreed action plan.		
Safeguarding Adults –	Final Report		
Quality Assurance	At the request of the Director of Housing & Community Care, work was undertaken in respect of the actions being taken by management to address the recommendations raised by the (former) Commission for Social Care Inspection (CSCI) regarding the Council's arrangements for safeguarding vulnerable adults.	N/A	N/A

Audit	Status as at 28 May 2010	Assurance Opinion
	In summary, we sought to obtain evidence to support the actions indicated by management as having been taken in relation to each of the recommendations raised, or, where there were further actions still due to be completed, we sought to obtain evidence to support their progression in accordance with deadlines agreed by management.	
	A detailed report was issued to management.	
	In summary, overall, we were able to confirm that a number of actions had been progressed against the recommendations raised by CSCI, as recorded in the Action Plan put together by management following their inspection. In addition, it was positive to note the results that management had reported from the case file audits, as these provide some assurance as to whether all of the work being undertaken in response to the recommendations is actually proving effective in terms of resultant improvements against the weaknesses originally identified by CSCI.	
	However, we did identify a number of points for management to consider in relation to certain actions, either with regards to the degree to which these were supported by documentary evidence, or with regards to the way in which the actual tasks had been carried out, although in no instance did our work question the actual performance of safeguarding processes, as we are not qualified to do so.	
	We also identified elements of the Action Plan which did not appear to be fully up to date at the time of our fieldwork, as well as weaknesses in the overall format of the Action Plan. These concerned the lack of clarity between actions completed and those still due for completion. In addition, some of the actions identified by management were written more as statements than clear actions.	
	An assurance opinion was not relevant for this work, but recommendations were raised in respect of any weaknesses or gaps identified.	
	All recommendations were accepted for implementation by management.	
	As raised with management, the Committee are reminded that our work	

Audit	Status as at 28 May 2010	Assurance Opi	nion
	cannot be taken as any form of guarantee as to the outcome of any future assessment of the Council's safeguarding arrangements, given that we are not qualified to make such an assessment from a social care perspective.		
Adult Social Care	Final Report		
Transformation – Reablement	At the request of the Assistant Director, Quality & Support, we undertook non-standard work in relation to the ongoing Transformation programme within Adult Social Care (ASC), specifically focusing on the Reablement workstream.	N/A	N/A
	We previously undertook work in 2008/09 in relation to the development of systems relating to Self Directed Support (SDS), as well as auditing the systems of control in place around Direct Payments.		
	Given that the Reablement project only entered the planning stages in late 2009 and is not due for full implementation until later in 2010, our work only focused on providing an initial assessment of the adequacy of controls being planned and implemented. An effectiveness assessment was not relevant at this time, nor was an overall assurance opinion.		
	Further work is planned for 2010/11, once the process has been implemented.		
LAA Stretch Target	Certification of Grant Claim; Training Workshop and guidance provided to relevant staff and PRU.	N/A	N/A

Audits currently at draft report stage or in progress

The table below lists those audits for which the management responses to the Draft Report are still in the process of being discussed and agreed, or for which responses are awaited, or where the audit is currently in progress.

Audit	Status as at 28 May 2010
Government Procurement Cards	Discussing Management Responses to the Draft Report.
ARK Academy (contract audit)	Awaiting Management Responses to the Draft Report.
Accuserv Application (BHP) (IT)	Awaiting Management Responses to the Draft Report.
Government Gateway Post Implementation (IT)	Awaiting Management Responses to the Draft Report.
Internal Financial Controls (BHP)	Awaiting Management Responses to the Draft Report.
Civic Centre (contract audit)	Awaiting Management Responses to the Draft Report.
Kilburn Square TMO (BHP)	Awaiting Management Responses to the Draft Report.
Housing & Council Tax Benefits	Awaiting Management Responses to the Draft Report.
Internal Financial Controls – Housing	Awaiting Management Responses to the Draft Report.
Internal Financial Controls – Adult Social Care	Awaiting Management Responses to the Draft Report.
Internal Financial Controls – Environment & Culture	Awaiting Management Responses to the Draft Report.
Internal Financial Controls – Children & Families	Awaiting Management Responses to the Draft Report.
John Kelly Boys School	Awaiting Management Responses to the Draft Report
John Kelly Girls School	Awaiting Management Responses to the Draft Report

FMSIS Assessments

The table below lists those primary schools for which an FMSiS assessment has been undertaken during the 2009/10 financial year, as well as the one from 2008/09 which is yet to be finalised. The deadline for this was extended to allow Education Finance to work with the school to address the issues regarding their understanding of the new budget monitoring pro-forma. At the current time these are still yet to be fully addressed in this case.

The assessments are required to be undertaken in accordance with the guidance issued by the Department for Children, Schools and Families (DCSF) and differ to the standard internal audits. Assurance opinions are not relevant as the schools receive either a Pass, Conditional Pass or Fail against the Standard.

School	Assessment Outcome	Status as at 28 May 2010
2008/09 Assessments		
John Keble C.E Primary School	Conditional Pass	Currently determining the final outcome.
2009/10 Assessments		
Carlton Vale Infant School	Pass	Complete
Wykeham Primary School	Pass	Complete
Islamia Primary School	Pass	Complete
Kensal Rise Primary School	Pass	Complete
Wembley Primary School	Pass	Complete
St Joseph's R.C Infant School	Pass	Complete
St Joseph's R.C Junior School	Pass	Complete
St Mary's RC Primary School	Pass	Complete
Mora Primary School	Pass	Complete
The Stonebridge Primary School	Pass	Complete
Lyon Park Junior School	Pass	Complete

School	Assessment Outcome	Status as at 28 May 2010
Newfield Primary School	Pass	Complete
Grove Park School	Pass	Complete
Hay Lane	Pass	Complete
Manor	Pass	Complete
St Robert Southwell Primary School	Pass	Complete
Roe Green Junior School	Pass	Complete
Roe Green Infants School	Pass	Complete
Avighdor Hirsch Torah Temimah Primary School	Pass	Complete
St Mary Magdalen's RC Junior School	Pass	Complete
Brentfield Primary School	Pass	Complete
Woodfield Primary School	Pass	Complete
Furness	Conditional Pass	Currently determining the final outcome.
Chalkhill Primary School	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.
Vernon House School	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.
Malorees Junior School	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.
Preston Manor High School (Secondary - Foundation)	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.
St Gregory's Science College (Secondary - Foundation)	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.

School	Assessment Outcome	Status as at 28 May 2010
Wembley High Technology College (Secondary - Foundation)	Conditional Pass	School are currently within the 20 working day period for addressing the gaps identified as part of the Conditional Pass.
Northwest London Jewish Day Primary School	Fail	School has been given 12 months within which to implement recommendations in order for a re-assessment to be undertaken.
Cardinal Hinsley Mathematics and Computing College (Secondary - Foundation)	To be completed	Currently determining outcome
Braintcroft Primary School	Still to be assessed. Assessment postponed to 2010/11 as School has just come out o Special Measures.	N/A

Audits previously reported to Committee as final

The table below sets out those audits from the 2009/10 Internal Audit Plan which have previously been reported to the Committee as final. They are included here so as to provide Members with an overview of the work completed for the year to date, together with the assurance opinions awarded.

Audit	Status as at the March 2010 Audit Committee meeting	Assurance Opinion
Veolia Contract Management / Recycling	Final Report. Previously reported to the Audit Committee in September 2009.	Substantial
Frameworki Financial Module Post Implementation (IT)	Final Report. Previously reported to the Audit Committee in September 2009.	Substantial
Stonebridge Estate – Hyde Contract Management	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Traffic Management - Notifications	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Blue Badges	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Pensions Application (IT)	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Windows Operating System (IT)	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Housing Repairs & Maintenance (BHP)	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial

Audit	Status as at the March 2010 Audit Committee meeting	Assurance Opinion
Cleaning and Grounds Maintenance Contract Management (BHP)	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Business Continuity Planning (BHP)	Final Report. Previously reported to the Audit Committee in December 2009.	Substantial
Appointeeships and Deputyships	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
Grants to Voluntary Organisations	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
Transportation	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
E-Recruitment Post Implementation (IT)	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
Repairs and Voids (BHP)	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
DomDoc EDM management system (BHP) (IT)	Final Report. Previously reported to the Audit Committee in March 2010.	Substantial
Home Care – Contract Management	Final Report. Previously reported to the Audit Committee in September 2009.	Limited

Audit	Status as at the March 2010 Audit Committee meeting	Assurance Opinion
Recruitment	Final Report. Previously reported to the Audit Committee in September 2009.	Limited
Joint Commissioning	Final Report. Previously reported to the Audit Committee in September 2009.	Limited
Complaints	Final Report. Previously reported to the Audit Committee in September 2009.	Limited
Private Sector Procurement Team	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Section 106	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Registration and Nationality Service	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Children's Centres Financial Management	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Treasury Management	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Treasury Management (BHP)	Final Report. Previously reported to the Audit Committee in December 2009.	Limited
Corporate Health & Safety	Final Report. Previously reported to the Audit Committee in March 2010.	Limited

Audit	Status as at the March 2010 Audit Committee meeting	Assurance Opinio	n
Cash Receipting Application (IT)	Final Report. Previously reported to the Audit Committee in March 2010.	Limited	L
Oracle I-Procurement Sanity Check	Final Report. Previously reported to the Audit Committee in September 2009.	N/A	N/A
Risk Management (BHP)	Final Report. Previously reported to the Audit Committee in September 2009.	N/A	N/A
Watling Gardens TMO (BHP)	Final Report. Previously reported to the Audit Committee in September 2009.	N/A	N/A
Sundry Debt Recovery Team	Final Report. Previously reported to the Audit Committee in December 2009.	N/A	N/A
Traffic Management - London operational Pilot Scheme (LoPS)	Final Report. Previously reported to the Audit Committee in December 2009.	N/A	N/A
Supporting People Programme Grant	Final Report. Previously reported to the Audit Committee in December 2009.	N/A	N/A

Customer Satisfaction

We set out below a breakdown of the feedback received through the Customer Satisfaction Questionnaires, as completed by auditees for work undertaken to date by Deloitte against the 2009/10 Internal Audit Plan.

5 = Excellent; 4 = Very Good; 3 = Satisfactory; 2 = Potential for Improvement; and 1 = Unsatisfactory.

Audit	Sufficient notice was provided prior to the start of the audit	Communication of audit objectives, purpose and scope	Effectiveness and professionalism of the auditor(s)	Auditor(s) understanding of the service you provide	Quality of exit meeting and discussion of report findings	Quality, accuracy and usefulness of the report	Overall opinion of the audit
Veolia Contract Management / Recycling	4	4	4	3	4	4	4
Complaints	4	5	3	3	4	4	4
Home Care Contract Management	5	4	4	4	3	3	3
Private Sector Procurement Team	3	4	4	4	2	3	3
Section 106	3	3	5	4	5	3	4
Sundry Debt Recovery Team	4	4	5	4	4	4	4
Traffic Management	4	5	5	4	4	4	4
Cash Receipting Application (IT)	4	4	5	5	5	5	5
E-Recruitment (IT)	5	5	5	5	5	5	5
Grants to Voluntary	3	3	4	3	3	4	3

Audit	Sufficient notice was provided prior to the start of the audit	Communication of audit objectives, purpose and scope	Effectiveness and professionalism of the auditor(s)	Auditor(s) understanding of the service you provide	Quality of exit meeting and discussion of report findings	Quality, accuracy and usefulness of the report	Overall opinion of the audit
Organisations							
Transportation	4	4	4	4	4	4	4
Blue Badges	4	4	4	4	4	4	4
Cleaning and Grounds Maintenance (BHP)	5	5	5	5	4	5	5
Treasury Management (BHP)	4	5	5	4	4	4	4
Housing Repairs & Maintenance (BHP)	5	5	5	4	5	5	5
ContactPoint Implementation Project	3	3	3	3	3	3	3
CRC Energy Efficiency Scheme	4	4	5	5	n/a	4	5

Appendix A – Audit Team and Contact Details

London Borough of Brent	Contact Details
Simon Lane – Head of Audit & Investigations	simon.lane@brent.gov.uk
Aina Uduehi – Audit Manager	
7 that Gaden 7 taak Manager	<u>aina.uduehi@brent.gov.uk</u>

Deloitte & Touche Public Sector Internal Audit Limited	Contact Details		
Richard Evans – General Manager	phil.lawson@brent.gov.uk		
Phil Lawson – Senior Audit Manager			
Shahab Hussein – Senior Computer Audit Manager			

Appendix B – Progress Against 2009/10 Internal Audit Plan

The table below sets out the detailed progress made against the agreed 2009/10 Internal Audit Plan, together with an indication of any instances where an audit has been removed from the Plan, any where an audit has been added, and also any for which the planned timing has had to be amended.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		CROSS COUNCIL AUDITS (70 Days	s) (increased to 92	days)	
Corporate Health & Safety	10	To focus on the controls in place with regards to managing health and safety across the Council. It is proposed that the specific scope of the audit should be aligned to the 10 point Health & Safety Service Plan produced for 2008/09, as this was formulated on the basis of the Health & Safety Commission (HSC) / industry guidance 'Health & Safety Leadership Checklist'. Consideration will also be given to the extent to which the new Health & Safety (Offences) Bill and the recently enacted Corporate Manslaughter & Corporate Homicide Act 2007 have been embedded into the Council's arrangements.	Service Unit Director, Health, Safety & Licensing	Qtr 1	Final Report issued.
Registers of Interest / Gifts & Hospitality	10 (reduced to 0)	To focus on the controls in place across the Council for ensuring that officers declare any interests / gifts & hospitality; that gifts & hospitality are only accepted in line with Council policy; and that appropriate follow-up actions are taken by management to ensure that any officers declaring interests / gifts & hospitality are operating in an appropriate manner.	determined	Qtr 1	Audit removed from the Plan due to the new Policy not yet having been implemented – to be included in the 2010/11 Plan.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Use of Consultants	10 (reduced to 0)	To focus on the controls in place around the identification of need for consultants to be engaged; the hiring of appropriately skilled and experienced consultants; the achievement of value for money in the hiring of consultants; and the monitoring of performance and time input for those consultants engaged.	To be determined	Qtr 2	Audit removed from the Plan due to the potential conflict of interest between Deloitte PSIA and Deloitte MCS. The in-house team's allocation of days does not allow this to be moved to them. Consideration will be given to whether this should be included within the 2010/11 Plan.
Project Management – feeding into One Council Review (part Contract Audit)	10 (reduced to 2)	To feed into the Once Council review being led by the Assistant Director of Regeneration on the management of Major Regeneration Programmes and Major Projects. Specific scope and approach still to be discussed with the Assistant Director of Regeneration. Work to be combined with IT Project Management, as included within the IT Plan.	Andy Donald – Assistant Director of Regeneration	To be determined	Senior Manager and Contract Audit Manager attended an initial workshop in June 2009, to provide an overview of weaknesses identified from previous audit work across the Council, as well as issues identified in other public sector organisations and potential key elements to consider. Development of a Project Management methodology is now being taken forward as part of the Council's Improvement & Efficiency Strategy and so no further input from Internal Audit is

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
					planned at this stage.
Local Public Service Agreement (LPSA) – Efficiency Target	10	Completion of necessary checks in order to certify that the stretch efficiency target has been met, thereby enabling the Council to claim the associated Performance Reward Grant.	Duncan McCleod – Director of Finance & Corporate Resources	Qtr 2	Audited as part of LAA Stretch Targets Certification in Qtr 2.
Annual Governance Statement	10	Production of the Annual Governance Statement through the co-ordination of the completion of the Certificates of Assurance by Directors and the annual review of the Council's Corporate Governance Action Plan.	Simon Lane – Head of Audit & Investigations / Directors	Qtr 4	Draft AGS is being presented to the Audit Committee.
CRC Energy Efficiency Scheme	15 (added to the Plan)	To undertake an exercise to assist management with determining their readiness with regards to the forthcoming CRC Energy Efficiency Scheme.	Duncan McLeod – Director of Finance & Corporate Resources	Added for Qtr4	Final Report Issued.
Finance Modernisation Project	30 (added to the Plan)	Review work in relation to the control processes being designed as part of the Finance Modernisation Project, focusing on the adequacy of controls being set out in the initial high level designs. Work will continue into 2010/11 as the detailed designs are formulated.	McCleod – Director of	Added for Qtr4	Draft Reports issued and being discussed with management.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Contract Management Summary Report (Cross Borough Work)	3 (added to the Plan)	Days have been agreed with each of the boroughs in the West London Framework for undertaking cross borough work in Qtr4. Production of a summary report of the key / common issues arising from the four contract management audits being undertaken, together with a cross borough comparison as part of the wider West London Framework.	N/A	Added for Qtr4	Report being circulated to management.
Contract and Performance Management of the ALMO relationship (Cross Borough Work)	12 (added to the Plan)	Days have been agreed with each of the boroughs in the West London Framework for undertaking cross borough work in Qtr4. Comparison exercise into the approach to contract and performance managing the ALMO relationships.	Various	Added for Qtr4	Report being circulated to management.
		FINANCE & CORPORATE RESOURCES	6 (108 Days) (reduc	ced to 88)	
Council Tax	15	Annual systems audit focussing on key controls and any systems changes.	Paula Buckley – Head of Client Team – Revenue & Benefits	Qtr 3	Final Report issued.
Housing & Council Tax Benefits	15	Annual systems audit focussing on key controls and any systems changes.	David Oates – Head of Benefits – Revenue & Benefits	Qtr 3	Report being circulated to management.
NNDR	15	Annual systems audit focussing on key controls and any systems changes.	Paula Buckley – Head of Client Team –	Qtr 3	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
			Revenue & Benefits		
Treasury Management	10	Annual systems audit focussing on key controls and any systems changes.	Martin Spriggs – Head of Exchequer & Investment	Qtr 1	Final Report issued.
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Head of Financial Management	Qtr 4	Final Report issued.
Sundry Debt Recovery Team	8	To focus on the systems of control being designed and implemented by the new Sundry Debt Recovery Team to take responsibility for debt recovery across the Council.	Exchequer	Qtr 2	Final Report issued.
Insurance	10	To focus on the controls in place around the Council's insurance function. Specific areas of focus are likely to include identification of required insurance coverage; raising of claims; monitoring progress and receipt of claims; processing of claims made against the Council; monitoring of claims received against the Council; and action taken to minimise the receipt of claims.	Head of Procurement Strategy & Risk Management	Qtr 1	Final Report to be issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Procurement - feeding into One Council Review (part Contract Audit)	10 (reduced to 0)	To feed into the Once Council review being led by the Head of Procurement Strategy & Risk Management and the Borough Solicitor on Procurement and Contract Management. Specific scope and approach still to be discussed with the Head of Procurement Strategy & Risk Management and the Borough Solicitor.	Head of Procurement Strategy & Risk Management	To be determined	Audit removed from the Plan. It is now unlikely that any input from Internal Audit will be appropriate in the 2009/10 financial year as the various Improvement & Efficiency projects are currently still at the scoping stage. This will be considered for inclusion as part of the 2010/11 Plan.
Procurement - post One Council Review (part Contract Audit)	10 (reduced to 0)	To focus on the controls put in place as part of the One Council review and the extent to which these are being effectively operated.	Alison Matheson – Head of Procurement Strategy & Risk Management	Qtr 4	As above.
		CHILDREN & FAMILIES (220 Days)	(increased to 242	days)	
FMSiS Assessments	112	Completion of assessments for the 25 remaining primary schools.	Bharat Jashapara – Head of Finance – Children & Families	Across the year	See breakdown in Executive Summary.
Schools Thematic Work	10 (reduced to 0)	To focus on a specific theme and visit a sample of schools to either assess compliance with the requirements of the Financial Regulations for Schools, or to assess the adequacy and effectiveness of controls in respect of fraud and non-fraud risks in that area. Thematic work being undertaken in 2008/09 is focussing on Procurement and	Jashapara – Head of Finance	Qtr 3	Removed from the Plan to accommodate the Foundation Schools that have been added.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		compliance with the Financial Regulations for Schools.			
Fostering & Adoption	10 (reduced to 0)	To focus on the controls in place around the assessment and approval of persons applying to be carers.	Graham Genoni – Assistant Director of Social Care	Qtr 1	Audit removed from the Plan as OFSTED inspection in this area – days being put towards addition of Foundation Schools.
SEN Statementing	10 (reduced to 0)	To feed into the Improvement & Efficiency review being undertaken in this area. Specific scope and approach still to be discussed with the Assistant Director of Achievement & Inclusion.	Rik Boxer – Assistant Director of Achievement & Inclusion	To be determined	Audit removed from the Plan due to the service review that has already been undertaken by the Brent Excellence Support Team (BEST). This will be considered for inclusion as part of the 2010/11 Plan.
Child Protection	15 (reduced to 2)	To feed into the Improvement & Efficiency review being undertaken in this area. Specific scope and approach still to be discussed with the Assistant Director of Social Care.	Graham Genoni – Assistant Director of Social Care	To be determined	Time was input into scoping and preparing for this audit. This included liaison with the Assistant Director of Social Care and the BEST, so as to co-ordinate this with their service review in this area. However, the Council has since had an unannounced visit from Ofsted and will now be subject to a full inspection. The audit is therefore being removed from the Plan. However, work will be considered for 2010/11 in order to assess

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
					the extent to which any recommendations raised by Ofsted have been implemented.
Joint Commissioning	10	To focus on the controls in place around the operations of the Joint Commissioning Team. Specific areas of focus are likely to include the achievement of value for money; compliance with the Council's Financial Regulations; management of partnership risk; and contract management.	Assistant Director of	Qtr 1	Final Report issued.
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Bharat Jashapara – Head of Finance – Children & Families	Qtr 4	Draft Report issued – awaiting management responses.
Wembley Park Academy Project (Contract Audit)	12	To focus on controls in place around the ongoing management of the Wembley Park Academy project. Contract audit work has been undertaken in 2008/09 focusing on initial stages of the project, including controls around tendering and governance structures.		To be determined	Draft Report issued – awaiting management responses.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Early Years	10 (reduced to 0)	To focus on the controls in place around the co-ordination of the service and the award of grant funding to nurseries.	Krutika Pau – Assistant Director of Strategy & Partnerships	Qtr 2	Audit removed from the Plan as work on Children's Centres has partly covered this – days being put towards addition of Foundation Schools.
Children's Centre Establishment Visit (changed to look at financial management across a number of Centres)	10 (increased to 15)	To focus on the controls in place around the management and administration of a chosen Children's Centre. Specific areas of focus are likely to include governance; staffing; procurement; income; management of assets; and budgetary control. Specific Children's Centre to be agreed with the Assistant Director of Strategy & Partnerships and the Head of Finance. Approach that was agreed on was to focus on key elements of financial management across a number of Children's Centres, as opposed to just visiting one Centre, i.e. thematic style work.	Krutika Pau – Assistant Director of Strategy & Partnerships	Qtr 1	Final Report issued.
Other Establishment Visit	8	To focus on the controls in place around the management and administration of a chosen establishment (not a school or Children's Centre). Specific areas of focus are likely to include governance; staffing; procurement; income; management of assets; and budgetary control. Specific establishment to be agreed with the Assistant Director of Achievement & Inclusion and the Head of Finance.	Rik Boxer – Assistant Director of Achievement & Inclusion	Qtr 2	Audit Removed from Plan – replaced by Foundation School Audits.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
John Kelly Boys and John Kelly Girls Schools (pre-Academy)	20 (added to the Plan)	Education Finance requested these to be added to the Plan, prior to the two schools transferring to Academy status, so as to provide the Council with an overview of the control environment for the first half of the 2009/10 financial year.	Bharat Jashapara – Head of Finance – Children & Families	Added for Qtr2	Final Reports issued.
Foundation Schools (Audit + FMSiS Re- Assessment)	48 (added to the Plan)	Audits of four Foundation Schools plus FMSiS re-assessment in line with the DCSF's three year cycle. The remaining Foundation Schools will be audited and re-assessed as part of the 2010/11 Internal Audit Plan.	Bharat Jashapara – Head of Finance – Children & Families	Added for Qtr4	Draft Reports issued for two of the four schools. These are currently within their 20 working day period for addressing the gaps identified as per the FMSiS assessment. Draft reports to be issued for the remaining two.
Sports Service	12	To focus on the systems of control in place within the internally managed Bridge Park and Charteris Centres. Specific areas of focus are likely to include the receipt of income at the Centres; recruitment and training of appropriate staff; maintenance and health & safety management; and performance management. This work will build on the internal audit undertaken in 2008/09 around the management of the contracts for the externally managed Willesden and Vale Farm Centres.	Sue Harper – Assistant Director, Leisure & Regeneration	Qtr 4	See review of Internal Financial Controls below.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Transportation	15 (reduced to 12)	To focus on the controls implemented within Transportation following restructuring and internal review work undertaken in 2008/09. Specific scope and approach still to be discussed with the Assistant Director, Streets & Transportation.	Assistant	Qtr 2	Final Report issued.
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Head of	Qtr 4	Draft Report issued – awaiting management response
Traffic Management Act – Part 3	10 (increased to 15)	To focus on the controls in place to ensure the Council's compliance with the Traffic Management Act 2004. Specific areas of focus are likely to include network management and enforcement policies; issuing of permits and collection of fees; inspections; fixed penalty notices; and performance monitoring. Additional two days added due to the audit looking at both the existing controls around 'notifications' and the Council's preparedness for the implementation of the new London Operational Permit Scheme (LoPS).	Assistant Director, Streets & Transportation	Qtr 2	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010			
Section 106	10	To focus on the controls in place around the Identification and agreement of S106 monies; receipt of monies; and identification of the use of funds.	Michael Read – Assistant Director, Policy & Regulation	Qtr 2	Final Report issued.			
Recycling	10 (reduced to 0)	To focus on the controls in place around the Council's recycling service, including the enforcement of the compulsory green box recycling scheme and administration of the other methods of recycling available to residents.	Keith Balmer – Director of StreetCare	Qtr 1	Audit combined with Veolia Contract Management – five days added to budget for Veloia Contract Management and five added to contingency			
Libraries	15 (reduced to 0)	To focus on the systems of control in place following the recent restructuring of the Library Service, including the controls in place to ensure compliance across individual libraries.	Assistant	Qtr 4	Audit removed from plan due to restructuring. Replaced by additional work on BHP TMOs'			
Veolia Contract Management (Contract Audit)	10 (increased to 15)	To focus on the controls in place around the management of the waste management contract with Veolia.	Keith Balmer – Director of StreetCare	Qtr 1	Final Report issued.			
Environmental Health	10 (reduced to 0)	To feed into the Improvement & Efficiency review being undertaken in this area. Specific scope and approach still to be discussed with the Assistant Director, Policy & Regulation.	Michael Read – Assistant Director, Policy & Regulation	To be determined	Audit removed from the Plan as scale of changes being made is understood be relatively small.			
	HOUSING (55 Days)							
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the	Eamonn McCarroll – Head of Finance	Qtr 4	Draft Report issued – awaiting management response.			

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.			
HMO (Houses in Multiple Occupation) Licensing	10	To focus on the controls in place around the processing of applications for HMO licenses; confirming compliance with qualifying requirements; the receipt of income for licenses; and ongoing monitoring / enforcement.	Assistant Director,	Qtr 3	Final Report to be issued.
Supporting People Programme Grant	10 (added to the Plan)	Certification of Supporting People Programme Grant.	Liz Zacharias	Added for Qtr 1	Audit added to the Plan and replaced with HMO audit scheduled for Qtr 1 deferred to Qtr 2. Final Report issued.
Private Sector Procurement Team	10	To focus on the controls in place around the procurement of private sector properties by the recently integrated Private Sector Procurement Team.	Perry Singh – Assistant Director, Housing Needs / Private Sector	Qtr 2	Final Report issued.
Performance Indicators	10 (reduced to 0)	To focus on the controls in place around the collection, collation, verification and reporting of data relating to key Housing performance indicators.		Qtr 1	Replaced by audit of Supporting People Programme Grant not previously included on Plan.
Stonebridge Estate – Hyde Contract Management	10	To focus on the controls in place around the management of the Stonebridge Estate contract with Hyde Group.	Maggie Rafalowicz – Assistant Director, Housing Strategy &	Qtr 3	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
			Regeneration		
		COMMUNITY CARE (111 Day	rs) (reduced to 81)		
Transformation – Assessment & Care Management (changed to focus on the Reablement workstream)	20 (reduced to 10)	To focus on the adequacy of controls implemented or being implemented in relation to the new assessment and care management framework being developed as part of the Adult Social Care Transformation Programme. Potentially to also conduct testing around the effectiveness of controls where implemented. (The focus has changed and we are now looking at the Reablement workstream. This is a new workstream and hence our work at this stage is focused on the adequacy of the controls being planned).	Shawcross – Assistant Director, Community Care (Lance Douglas – Assistant Director, Quality & Support)	Qtr 4	Draft Report issued – awaiting management responses.
Transformation – Self Directed Support	10 (increased to 20, but postponed until 2010/11 as carry forward)	To focus on the progress made in the development and implementation of systems of control in respect of Self Directed Support. Internal audit work has been undertaken as part of the 2008/09 Plan, but has been more focussed on assessing the adequacy of any controls currently being planned for implementation as well as facilitating further discussion on specific issues to be considered during the development stages. (Follow-up of the work done on Direct Payments in 2008/09 will also be combined into this audit).	AssistantDirector, Quality& Support	Qtr 2	Postponed until April/May 2010/11 – 20 days carried forward into the 2010/11 Plan.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Grants to Voluntary Organisations	10	To focus on the controls being implemented as part of the restructure of this area, in terms of the way in which the Main Programme Grant is allocated and administered, and the way in which the team responsible for this operates. The implementation of further actions identified as being necessary from the 2008/09 follow-up of the 2007/08 internal audit in this area will also be focussed upon in this audit.	Head of Service Development &	Qtr 3	Final Report issued.
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Assistant Director, Finance & Resources	Qtr 4	Draft Report Issued – awaiting management response.
Appointeeships & Deputyships	10	To focus on the controls in place around the management of funds for vulnerable clients. This area was previously audited at the end of 2006/07 but has not yet been followed up due to the implementation of the finance module within Frameworki and the migration of financial data to that system. That migration is now nearing completion after which this audit will take place.	Assistant Director, Finance & Resources	Qtr 1	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Mental Health Integration with Central & North West London Mental Health Trust	10 (reduced to 0)	To focus on the controls being planned and implemented as part of the integration of the Mental Health Service and Central & North West London Mental Health Trust.	Shawcross -	Q4	Audit not undertaken as the Assistant Director, Community Care, left the organisation before scope of audit could be determined.
Blue Badges	8	To focus on the controls in place over the processing of applications for a Blue Badge, including verifying entitlement and avoiding duplicate awards.	Shawcross –	Qtr 2	Final Report issued.
Quality Assurance Systems - Safeguarding	10	To focus on the controls being designed and implemented as part of a new quality assurance system to address the action plan resulting from the recent CSCI (Commission for Social Care Inspection) inspection. The focus will be on the adequacy of these controls as opposed to on their effectiveness at this stage.	Shawcross – Assistant	Qtr 1	Final Report issued.
Home Care Contract Management (Contract Audit)	10	To focus on the controls in place around the management of the Home Care contract.		Qtr 1	Final Report issued.
Establishment visit	10	To focus on the controls in place around the management and administration of a chosen establishment. Specific areas of focus are likely to include staffing; procurement; income and cash handling; management of assets; and budgetary	Shawcross – Assistant Director, Community	Qtr 2	Summary report being circulated to management.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		control. Specific establishment to be agreed with the Assistant Director, Community Care. (Focus of this work has been amended. Rather than visiting one establishment, a report is being written to summarise the common weaknesses that have been identified across the establishments in recent audits. A workshop will then be organised with key officers to discuss this, so as to help ensure a shared understanding and to try and address the weaknesses in a consistent manner across all establishments).			
		POLICY & REGENERATION (45 I	 Days) (reduced to 2	L 25)	
Performance Management/LAA Stretch Targets Certification	15	Specific use of these days is still to be discussed with the Assistant Director, Policy. Work undertaken in 2008/09 has focused on the controls in place around the collection, collation, verification and reporting of data in relation to a number of performance indicators, including the Local Area Agreement (LAA) Stretch Targets.	Cathy Tyson –	Qtr 2 & 3	Grant Certification Issued and training provided for all relevant staff on issues arising.
Complaints	10	To focus on the controls in place for ensuring that all received complaints are dealt with in an appropriate and timely manner, in accordance with the Council's Complaints Policy, and the extent to which controls are in place for seeking to	Corporate Complaints	Qtr 1	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		minimise future complaints.			
Regeneration	20 (reduced to 0)	Specific use of these days is still to be discussed with the Assistant Director of Regeneration		To be determined	Initial discussions were held with the Assistant Director of Regeneration to discuss potential coverage. Days now removed from the Plan. Consideration will be given to inclusion within the 2010/11 Plan.
		COMMUNICATION & DIVERSITY (10	Days) (reduced to	0 days)	
Equalities	10 (reduced to 0)	To focus on the controls in place in respect of managing equality related issues across the Council, and preparedness for the changes being introduced around the Standard. Currently the Corporate Diversity Team are focusing on the Council achieving Level 4 against the Standard, having already achieved Level 3. Further discussions will be held with the Head of Diversity regarding the exact focus of this audit so as to avoid any duplication with the external assessment against the Standard.		Qtr 3	Audit removed from the Plan in agreement with the Head of Diversity due to coverage from the external assessments.
		BOROUGH SOLICITOR	R (12 Days)		
Registration and Nationality Service	12	To focus on the controls in place around processing requests for checking British Citizenship applications; registering births and deaths; taking notices of intent to marry or join in civil partnership; and the	Service Unit Director –	Qtr 1	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		receipt of income for each of the above.	Service		
		BUSINESS TRANSFORMAT	TION (196 Days)		
IT	146 (reduced to 121)	See separate plan – Table 2	-	-	See Table 2.
Payroll	15	Annual systems audit focussing on key controls and any systems changes.	Simon Britton – Head of The People Centre	Qtr 3	Final Report issued.
Internal Financial Controls	15	Annual audit focussing on key financial controls operating within the Service Areas and the extent to which the Council's Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Head of Financial Management	Qtr 4	Final Report issued.
Government Procurement Cards	10	To focus on the controls in place around Government Procurement Cards (GPC). Specific areas of focus are likely to include the provision of GPCs; review of card holder's expenditure; and monitoring of overall spending patterns.	Head of The People Centre	Qtr 2	Draft report issued – discussing management responses.
Recruitment (existing arrangements)	10	To focus on the controls in place around recruitment. Specific areas of focus are likely to include approval of new posts; advertising of vacancies; assessment of candidates; and approval of job awards.	Head of The People Centre	Qtr 1	Final Report issued.
Employee Verification	10	To focus on the controls implemented around the new arrangements for directly		Qtr 3	No audited.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		awarding work permits to job applicants to the Council and the schools (the Council is now licensed to award these under the Government's new points based scheme). Also to focus on compliance with the Council's newly updated CRB policy.	People Centre		
Civic Centre Project (part Contract Audit)	15	To focus on the controls in place over the management of the project as a whole, as well as potential focus on the specific construction elements of the project from a contract audit perspective and / or the management of other sub-elements of the overall project. Specific scope and approach still to be discussed with the Assistant Director, Business Transformation.	Aktar Choudhary – Assistant Director, Business Transformation	To be determined	Draft Report issued – awaiting management responses.
		OTHER			
Brent Housing Partnership (BHP)	128 (increased to 143)	See separate plan – Table 3	-	-	See Table 3.
	•				
Consultation, Communication and Reporting (Deloitte)	85	To cover attendance by Deloitte management at meetings across the Council, for example Strategic Finance Group, Schools Causing Financial Concern, and Audit & Investigations Management meetings. Also to cover Deloitte management attendance at Audit Committee meetings and the production of progress reports for these. In addition, to cover Deloitte managements' non-audit	N/A	Throughout the year	Complete.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		specific liaison and communication with officers across the Council on a day-to-day basis and with the Council's external auditors, the Audit Commission. For example, ongoing liaison with Directors and Assistant Directors regarding any necessary revisions to the Plan and communication of key issues arising from completed internal audit work, and liaison with the Audit Commission regarding their review of completed internal audit work.			
Follow-Up	40	Completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 Internal Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 internal audits.	dependent upon each internal audit to be	Throughout the year	Complete.
Contingency	14 (currently increased to 59)	To be allocated to any new developments or new / emerging risk areas during the course of the year. The number of days assigned to contingency is relatively low given the overall size of the Plan. However, based on previous years, this is likely to grow during the course of the year due to audits	N/A – dependent upon work required	N/A – dependent upon work required	The contingency balance relates to the two Foundation schools (24 days) and the work on the Adult Social Care Transformation Programme (20 days) which we have explained in the main body

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	ORIGINAL PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		needing to be postponed due to delays in projects / new developments being fully implemented. In the event that additional work is required for which insufficient contingency days are available, a decision will be made on whether other lower risk audits can be deferred until 2010/11.			of the report and which will be carried forward to 2010/11.
TOTAL	1211				

Table 2 – IT Plan

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Oracle Application Audit	10 (reduced to 0)	To focus on the new version of Oracle to be used by Housing & Community Care and Children & Families from April 2009. Specific areas of focus are likely to include access controls; data input controls; data processing controls; data output controls; data interfaces; management trails; backup and recovery; and maintenance and support arrangements. The audit will also take account of previous findings from the Application Audit done with Housing & Community Care in 2007/08, as followed-up in 2008/09.	Mark Peart – Head of Financial Management	Qtr 1	Audit removed from the Plan at the request of the Head of Financial Management due to focus on year-end closing of accounts and progressing Oracle roll-out. However, this has been replaced with a further audit on the I-Procurement module. An audit of the full Oracle application will be included within the 2010/11 Plan following full roll-out.
Oracle I- Procurement Pre- Implementation ('Sanity Check')	7	New I-Procurement module due to be piloted in Children & Families in May / June 2009. To undertake a 'sanity check' on the adequacy of the IT controls built into this module prior to full roll out by management.	Mark Peart – Head of Financial Management	Qtr 1	Final Report issued.
Oracle I- Procurement Module	10 (added to the Plan, but later postponed and hence reduced to 0)	Further work around the development and roll out of the I-Procurement module, as requested by the Head of Financial Management.	Mark Peart – Head of Financial Management	Added for Qtr 4	Audit was added in December at the request of the Head of Financial Management. However, as per the comments above, it was later requested that this be postponed due to the focus on year-end closing

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
					and progressing the roll-out.
Oracle Pre- Implementation (Environment & Culture and Finance & Corporate Resources)	10 (reduced to 0)	Environment & Culture and Finance & Corporate Resources due to go live on Oracle from 1 April 2010. Pre-Implementation Audit to cover these two Service Areas, but scope to be tailored to focus on key areas. Some areas of scope to be considered for exclusion where they have been previously covered in the Children & Families Pre-Implementation Audit, although any previously raised recommendations to be followed-up where further actions have been identified as necessary from our 2008/09 work.	Mark Peart – Head of Financial Management	Qtr 3	Audit removed, as per comments above.
Government Gateway Post Implementation	10	Postponed from 2008/09 due to delay in implementation. Post Implementation audit focusing on the controls in place around user requirements; maintenance and support arrangements; security; interfaces; and the assessment of the benefits realised by the project.	Raj Seedher – IT Standards Manager	Qtr 2	Draft Report issued – awaiting management responses.
Frameworki Financials Post Implementation	10	Post Implementation audit focusing on the controls in place around user requirements; maintenance and support arrangements; security; interfaces; and the assessment of the benefits realised by the project.	Gordon Fryer – Assistant Director, Finance, Adult Social Care	Qtr 2	Final Report issued.
Contact Point	10	Council are required to provide assurances prior to being given access to the national Contact Point database. To focus on the controls in place to ensure that those assurances can be given, and to potentially	Bhavna Bilimoria – Special Project Manager, Children &	To be determined	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		feed into the provision of the required assurances.	Families		
AXIS Post Implementation (cash receipting system - previously Spectrum)	10	First part of the new system covering telephone and online payments is due to go live in March 2009. Full implementation due September 2009. Post Implementation audit focusing on the controls in place around user requirements; maintenance and support arrangements; security; interfaces; and the assessment of the benefits realised by the project.	Sarah Cardno – Exchequer Services Manager	Qtr 3	Final Report issued.
LAGAN Post Implementation (new CRM system)	10	Post Implementation audit focusing on the controls in place around user requirements; maintenance and support arrangements; security; interfaces; and the assessment of the benefits realised by the project.	Tom Lloyd – ITU Operations Manager	To be determined	Final Report issued.
Windows Operating System	8	To focus on the controls in place around areas including system wide security; user access; remote access; network sharing; updates and patches; backup and recovery; and maintenance and support arrangements.	Tom Lloyd – ITU Operations Manager	Qtr 1	Final Report issued.
Business Continuity Planning (IT elements of corporate arrangements)	10	To focus on the IT elements of the corporate BCP arrangements. General internal audit work has been undertaken in relation to the development of BCP across the Council as part of both the 2007/08 and 2008/09 Plans, but coverage has not extended to IT. Recent IT audits have also identified further improvements as being necessary in respect of disaster recovery.	Tom Lloyd – ITU Operations Manager	Qtr 4	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
iCasework Application – Support Arrangements	7	To focus on the support arrangements as concerns raised regarding these by the ITU Operations Manager.	Judith Young – Head of Policy, Information & Performance, Environment & Culture	Qtr 2	Final Report issued.
IT Project Management	10 (reduced to 0)	To feed into the Once Council review being led by the Assistant Director of Regeneration on the management of Major Regeneration Programmes and Major Projects. Specific scope and approach still to be discussed with the Assistant Director of Regeneration and with the ITU Operations Manager. Work to be combined with the internal audit work on Project Management, as included within the main Plan.	Andy Donald – Assistant Director of Regeneration / Tom Lloyd – ITU Operations Manager	To be determined	See comments against Project Management in Table 1.
Pensions Application Audit	10	To focus on the controls in place around the Pensions application operated by the London Pensions Fund Authority in respect of the Council's pensions administration function. Specific areas of focus are likely to include access controls; data input controls; data processing controls; data output controls; data interfaces; management trails; backup and recovery; and maintenance and support arrangements.	Andrew Gray – Pensions Manager	Qtr 1	Final Report issued.
e-Recruitment Post Implementation	8	Post Implementation audit focusing on the controls in place around user requirements; maintenance and support arrangements; security; interfaces; and the assessment of	Simon Britton – Head of The People Centre	Qtr 3	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		the benefits realised by the project.			
IT Follow-Ups	16	Completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 IT Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 IT Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 IT audits.	dependent upon each internal audit to be	Throughout the year	Complete.
IT Audit Needs Assessment	5 (added to the Plan)	Full audit needs assessment so as to fully refresh the Strategic Plan in place for IT audits from 2010/11 onwards	Tom Lloyd – ITU Operations Manager	Qtr 4	Complete.
TOTAL	146 (reduced to 121)				

Table 3 – BHP Plan

This Plan has been formulated separately with the Financial Controller and Financial Operations Manager at BHP. The Plan will be presented separately to BHP's Audit & Finance Sub-Committee for agreement, but is presented here for Members' reference.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Housing Repairs & Maintenance	12	Annual systems audit focussing on key controls and any systems changes.	Gerry Doherty – Director of Technical Services	Qtr 3	Final Report issued.
Housing Rents	12	Annual systems audit focussing on key controls and any systems changes.	David Bishopp – Rent Accounting & Performance Manager	Qtr 3	Final Report to be issued.
Repairs & Voids	10	To focus on the controls in place around repairs & voids, as implemented / revised following the implementation of the new Accuserve costing system. Specific areas of focus are likely to include identification of required works; costing of works; review of completed works; variations; and payments to operatives / sub-contractors.	Gerry Doherty – Director of Technical Services	Qtr 3 (brought forward to Qtr 2)	Final Report issued.
		The timing of this audit will coincide with the IT audit of the Accuserve application. The intention being to provide assurances on both the IT and non-IT controls at the same time so as to assist management with making any further improvements where necessary.			
Accuserve (Repairs & Voids) (IT Audit)	10	To focus on the Accuserve application. As above, the timing of this audit will coincide with the internal audit of the Repairs & Voids function as a whole. The intention being to provide assurances on both the IT	Gerry Doherty – Director of Technical Services	Qtr 3 (brought forward to Qtr 2)	Draft Report issued – awaiting management responses.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
		and non-IT controls at the same time so as to assist management with making any further improvements where necessary.			
Internal Financial Controls	10	Annual audit focussing on key financial controls operating within BHP and the extent to which the Financial Regulations are being complied with. Specific areas of focus include the raising of invoices; receipt of income; debt recovery and write-off; payments; BACs and cheque controls; journals; and reconciliations.	Greg Trenear – Financial Controller	Qtr 4	Draft Report issued – awaiting management responses.
Treasury Management	10	To focus on the controls in place around the treasury management function. Specific areas of focus are likely to include compliance with legislative requirements; recording of loans and investments; monitoring of cash flow; reconciliations; and reporting.	Greg Trenear – Financial Controller	Qtr 1	Final Report issued.
Business Continuity Planning	10	To focus on the controls in place around the specific business continuity arrangements for BHP (with the exception of IT, BHP has separate arrangements to those of the Council). Specific areas of focus are likely to include the identification of key activities and staff; the identification and assessment of the likelihood and impact of potential threats; the formulation of a business continuity strategy and business continuity plan; awareness and training; maintaining and exercising the plan; and public relations and crisis co-ordination.	Mike Dwyer – Director of Standards & Procurement	Qtr 1	Final Report issued.

AUDIT	DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
Cleaning and Grounds Maintenance Contract Management (Contract Audit)	10	To focus on the controls in place around the management of the cleaning and grounds maintenance contracts.	Mike Dwyer – Director of Standards & Procurement	Qtr 2	Final Report issued.
Brentfield Estate Project (Contract Audit)	12 (reduced to 0)	To focus on the controls in place around the management of the Brentfield Estate Project. Specific areas of focus are likely to include financial control; selection of contractors and letting of the contract; appointment of consultants; tender receipt and evaluation; bonds/insurance; contract variations and provisional sums; valuations and estimations of final cost; liquidated damages; defect liability period; contractual claims; CDM regulations; and progress monitoring.	Gerry Doherty – Director of Technical Services / Sue DeSouza – Special Projects	To be determined	Audit removed from the Plan as being undertaken as part of additional Contract Audit work agreed separately with the Director of Finance for BHP. Days transferred to work on Risk Management (see below)
Risk Management	12 (added to the Plan, as above)	Work is being undertaken to assist the Director of Finance with further developing the risk management framework.	Gary Chase – Director of Finance	Qtr 2 and ongoing	Final Report issued.
Tenant Management Organisations	10 (increased to 25	To focus on the controls in place around Tenant Management Organisations (TMOs). Specific areas of focus are likely to include governance; staffing; procurement; income; management of assets; and budgetary control. Specific TMO to be agreed with the Head of Governance & Communications.	Linda Footer – Head of Governance & Communication s	Qtr 2	Final Report re Watling Gardens Issued. Kilburn Square – Draft Report issued. Awaiting Management Response.
Dom Doc – EDM System (IT Audit)	10	Dom Doc is the Electronic Document Management system used by frontline staff	Mike Dwyer – Director of	Qtr 1	Final Report issued.

DAYS	PROPOSED COVERAGE	KEY CONTACT	PROPOSED TIMING	STATUS AS AT 28 MAY 2010
12	To cover attendance by Internal Audit management at Audit Committee meetings and the production of progress reports for these. In addition, to cover managements' non-audit specific liaison and communication with officers during the course of the year, for example ongoing liaison regarding any necessary revisions to the Plan and communication of key issues arising from completed internal audit work. In addition, completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 BHP Internal Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 internal audits.	N/A	Throughout the year	Complete.
128 (increased				
	128	across BHP. Specific areas of focus are likely to include access controls; data input controls; data processing controls; data output controls; data interfaces; management trails; backup and recovery; and maintenance and support arrangements. 12 To cover attendance by Internal Audit management at Audit Committee meetings and the production of progress reports for these. In addition, to cover managements' non-audit specific liaison and communication with officers during the course of the year, for example ongoing liaison regarding any necessary revisions to the Plan and communication of key issues arising from completed internal audit work. In addition, completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 BHP Internal Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 internal audits.	across BHP. Specific areas of focus are likely to include access controls; data input controls; data processing controls; data output controls; data interfaces; management trails; backup and recovery; and maintenance and support arrangements. 12 To cover attendance by Internal Audit management at Audit Committee meetings and the production of progress reports for these. In addition, to cover managements' non-audit specific liaison and communication with officers during the course of the year, for example ongoing liaison regarding any necessary revisions to the Plan and communication of key issues arising from completed internal audit work. In addition, completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 BHP Internal Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 internal audits.	across BHP. Specific areas of focus are likely to include access controls; data input controls; data processing controls; data output controls; data interfaces; management trails; backup and recovery; and maintenance and support arrangements. 12 To cover attendance by Internal Audit management at Audit Committee meetings and the production of progress reports for these. In addition, to cover managements' non-audit specific liaison and communication with officers during the course of the year, for example ongoing liaison regarding any necessary revisions to the Plan and communication of key issues arising from completed internal audit work. In addition, completion of follow-up work on all recommendations raised and agreed as part of the 2008/09 BHP Internal Audit Plan, where the same audits are not being undertaken again as part of the 2009/10 Plan. Also, to follow-up on any further actions raised as part of the 2008/09 follow-up work as being necessary to fully implement recommendations from 2007/08 internal audits.



Audit Committee 15 June 2010

Report from the Director of Finance and Corporate Resources

For Action Wards affected: ALL

Annual Governance Statement

1 Summary

1.1 This report sets out the proposed Annual Governance Statement for inclusion in the council's accounts for 2009/10 as required by the Accounts and Audit Regulations 2003 (as amended).

2 Recommendations

2.1 The Audit Committee approve the content of the Annual Governance Statement as set out in appendix 1.

3 Detail

- 3.1 The requirement for an annual review of governance is set out in the CIPFA/SOLACE framework¹ and the Audit Committee has a key role to play in assessing the adequacy of governance across the council and the validity of the Annual Governance Statement (AGS)
- 3.2 The Council has approved and adopted a local code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code is contained in part 7 of the council's Constitution⁵. The AGS explains how the council has complied with this code.
- 3.3 The AGS has been informed by a corporate governance review which relied upon already existing documentation and information from various sources across the council. These sources include performance information, risk management, Borough Solicitor, Service Directors, Director of Finance and Corporate Resources, Internal Audit, External Audit, Inspectorates and partners.

3.4 The AGS contains the council's corporate governance action plan. This plan was first developed in October 2003 and has been refreshed annually.

4 Financial Implications

4.1 None

5 Legal Implications

- 5.1 Regulation 4(2) of the Accounts and Audit Regulations 2003² (as amended 2006³) requires the Council to review its system of internal control and Regulation 4(3) requires the preparation of a statement on that review in accordance with "proper practice".
- On 18th August 2006 the Department for Communities and Local Government issued further guidance to clarify what they deemed as "proper practice". Section 7 of circular 03/2006⁴ stated that "proper practice" in relation to internal control relates to guidance contained in the following documentation:
 - Statement on Internal Control in Local Government: meeting the requirements of the Accounts and Audit Regulations 2003, published by CIPFA in 2004
 - Corporate Governance in Local Government: A Keystone for Community Governance (Framework and Guidance Note), produced by CIPFA/SOLACE in 2001 (recently updated)
- 5.3 Circular 03/2006 cleared the way for the annual governance statement (originally intended as part of the 2001 framework) to be assigned proper practice status and, therefore, have statutory backing.
- 5.4 CIPFA also confirmed that such status was assigned to the annual governance statement from 1st April 2007. This means that it formally replaced its proper practice association with the Statement on Internal Control with effect from the 2007/8 reporting year.

6 Diversity Implications

6.1 None

7 Background Papers

- Report from the Director of Finance and Corporate Resources to the Audit Committee 18th December 2007. New CIPFA / SOLACE Corporate Governance Arrangements
- 2. Accounts and Audit Regulations 2003
- 3. Accounts and Audit (Amendment) (England) Regulations 2006
- 4. Department of Communities and Local Government (2006). *Guidance on the Accounts and Audit regulations 2003*

5. London Borough of Brent (2010). *Constitution*. http://www.brent.gov.uk/Democracy.nsf/

8 Contact Officer Details

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DUNCAN McLEOD
Director of Finance and Corporate Resources

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BRENT COUNCIL ANNUAL GOVERNANCE STATEMENT 2009/10

1 Scope of responsibility

- 1.1 The Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.
- 1.3 The Council has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code is contained in the council's Constitution and can be found on our website at http://www.brent.gov.uk/Democracy.nsf/.
- 1.4 This statement explains how the Council has complied with the code and also meets the requirements of regulation 4(2) of the Accounts and Audit Regulations 2003 as amended by the Accounts and Audit (Amendment) (England) Regulations 2006 in relation to the publication of a statement on internal control.

2 The purpose of the governance framework

- 2.1 The governance framework comprises the systems and processes, and culture and values, by which the authority is directed and controlled and its activities through which it accounts to, engages with and leads the community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.

2.3 The governance framework has been in place at the Council for the year ended 31 March 2010 and up to the date of approval of the statement of accounts.

3 The governance framework

- 3.1 The key elements of the systems and processes that comprise the Council's governance arrangements are set out over the following pages against the six core principles upon which the CIPFA/SOLACE Framework is based. The six core principles being as follows:
 - 1. Focusing on the purpose of the Authority and on outcomes for the community and creating and implementing a vision for the local area;
 - 2. Members and officers working together to achieve a common purpose with clearly defined functions and roles;
 - 3. Promoting values of the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour;
 - 4. Taking informed and transparent decisions which are subject to effective scrutiny and managing risk;
 - 5. Developing the capacity and capability of members and officers to be effective; and
 - 6. Engaging with local people and other stakeholders to ensure robust public accountability.
- 3.2 Each of these core principles are broken down into a number of supporting principles and these are used by the Council on an annual basis to review and summarise the key elements of the overall governance framework, as well as to identify specific actions needed to address any weaknesses and/or to achieve further improvement in the year ahead. The arrangements for reviewing the effectiveness of the governance framework are detailed in section 4 of this statement.
- 3.3 The tables set out over the following pages provide an overview of the key elements of the governance arrangements against the six core principles, together with any actions to be focussed upon during the 2010/11 financial year.

The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
Develop and promote the authority's purpose and vision	In November 2006 the Council agreed its Corporate Strategy for the following four year period. The aims and targets set out in the Strategy are consistent with those set out in the Community Strategy and have been used to support the development of the Local Area Agreement (LAA) 2008. The priorities of the Corporate Strategy are regularly promoted via The Brent Magazine, the website, press releases and targeted campaigns. At service area level, service priorities are extensively consulted on with users and other relevant stakeholders. Service Plans are presented annually to Lead Members prior to finalisation.	A new Corporate Strategy will be developed by September 2010 to reflect the priorities under the new administration
		Director of Policy and Regeneration
2. Review on a regular basis the authority's vision for the local area	Implementation of the Corporate Strategy is monitored by the Executive. The LAA is monitored by the Local Strategic Partnership (LSP) and Executive.	
and its impact on the authority's governance arrangements	Implementation of Service Plans at service area level are monitored throughout the year by Departmental Management Teams (DMTs) using a range of embedded systems and processes.	
3. Ensure that partnerships are underpinned by a common vision of their work that is understood and agreed by all parties.	In 2009 the IDEA framework was used to assess the LSP and establish a new governance structure. The LSP Strategic Forum makes recommendations to the LSP Executive regarding priorities. The Council and its partners on the LSP identified 35 priorities for inclusion in the LAA for 2008 to 2011. At service area level, objectives of partnerships are documented in the Service Plans and within contract documentation.	
4. Publish an annual report on a timely basis to communicate the authority's activities and achievements, its financial position and performance.	A joint review of performance and summary of accounts has been produced annually over the last two years and summarised in the Brent Magazine. Progress against the Corporate Strategy was last published in August 2009.	
5. Decide how the quality of service for users is to be measured and make sure that the information needed to review service quality effectively and regularly is available.	The Corporate Strategy set out specific improvement targets across the range of council services. These are reflected in our LAA priorities, and also within Service Plans, and are monitored through the corporate PerformancePlus system. Performance reports on all Council and partnership improvement priority areas are reported to the Executive and the CMT on a quarterly basis. Significant improvements in monitoring of shared Community Plan objectives have taken place with	
	quarterly monitoring reports on the LAA targets being considered by the LSP. A new Improvement and Efficiency Strategy was published in 2008 and an action plan prepared which	

The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
	is now being addressed through the One Council programme.	
	At service area level, additional mechanisms are in place to monitor the quality of service being delivered, be this directly or through partner organisations.	
	The bi-annual Residents Attitude Survey is a further source of information regarding service users' satisfaction with the services being provided. The last survey was carried out in 2009/10.	
6. Put in place effective arrangements to identify and deal with failure in service delivery.	Potential service failure is identified through the PerformancePlus system and Service Plans. These are regularly reviewed and referred to the Corporate Management Team for a corporate response and remedial action.	
	Performance issues in relation to specific partner organisations / contractors are dealt with at service area level in accordance with agreed contract management procedures. Issues are escalated as appropriate.	
7. Decide how value for money is to be measured and make sure that the	improving value for money and performance over the next four years.	
authority or partnership has the information needed to review value for money and performance		
effectively. Measure the environmental impact of policies, plans and decisions.	Additional benchmarking of services included CIPFA benchmarking clubs for support services and a comparative review of efficiency savings and service costs with Hounslow and Hammersmith & Fulham Councils.	
	Deloitte MCS Ltd have benchmarked the cost of the finance function as a result of the One Council review of finance.	
	The One Council Programme Board measures progress against the Improvement and Efficiency Action Plan which underpins the Improvement and Efficiency Strategy. The council now brings together finance, activity and performance monitoring in a single performance and finance review report which enables officers and members to have a more holistic view of progress across the council on Value for Money. In addition, development of a value for money tool-kit for managers is one of a range of measures to support managers delivering better value for money. Unit costs are also used to measure progress in key areas e.g. on the children's transformation agenda.	
	In addition PWC have benchmarked the council's staffing structure which has informed the Staffing and Structure Review.	

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	CORE PRINCIPLE 2 - Members and officers working together to achieve a common purpose with clearly defined functions and roles				
	The local code should reflect the requirements for local authorities to:				
	1. Set out a clear statement of the respective roles and responsibilities	Article 2 of the Constitution describes the role of Members of the Council, the Executive, Mayor, Full Council and overview and Scrutiny.			
	of the executive and of the executive's members individually and the authority's approach towards putting this into practice.	Up to date job descriptions are in place for Senior Officers. Monitoring Officer Advice Notes give advice to Members on decision making and standards of conduct. Local Democracy and Standards WebPages are updated regularly. All Executive decisions and key decisions by officers are recorded			
Doo	2. Set out a clear statement of the respective roles and responsibilities of other authority members, members generally and of senior officers.	Roles and responsibilities are covered in the Constitution Up to date job descriptions are in place for Senior Officers.			
2 1 1 0	3. Determine a scheme of delegation and reserve powers	Clearly set out in the Constitution. The Borough Solicitor maintains a register of officer authorisations. The Constitution is renewed and reported to full Council every May.			
	4. Make a chief executive or equivalent responsible and accountable to the authority for all aspects of operational management.	Covered in the Constitution and job descriptions.			

CORE PRINCIPLE 2 - Members and officers working together to achieve a common purpose with clearly defined functions and roles				
The local code should reflect the requirements for local authorities to:				
5. Develop protocols to ensure that the leader and chief executive negotiate their respective roles early in the relationship and that a shared understanding of roles and objectives is maintained.	Chief Executive and Leader agreed respective roles following election in May 2006 and met on a weekly basis. New arrangements have been made with the new Leader following the local election in May 2010 with regular meetings taking place			
6. Make a senior officer (usually the section 151 officer) responsible to	Covered in the Constitution and job description.			
the authority for ensuring that appropriate advice is given on all	Covered by statute and Financial Regulations.			
financial matters, for keeping proper financial records and	All Executive reports have to be cleared by the Director of Finance & Corporate Resources. Director attends all Leader's briefings and meetings of the Executive and full Council.			
accounts, and for maintaining an effective system of internal financial control.	Independent assurance on the adequacy and effectiveness of the overall systems of internal control, including internal financial control, is provided by the Council's external auditors, internal auditors and a number of other external bodies / inspectorate. Both the internal and external auditors report to the Audit Committee on a quarterly basis.			
7. Make a senior officer (other than	Covered in the Constitution and job descriptions.			
the Responsible Financial Officer) responsible to the authority for	Covered by statute and Financial Regulations.			
ensuring that agreed procedures are followed and that all applicable statutes, regulations are complied with.	All reports have to be cleared by the Borough Solicitor who attends all Leader's briefings and meetings of the Executive and full Council. A lawyer also attends all other committee meetings and is responsible for issuing the legislation tracker, monitoring officer advice notes and legal bulletins.			
8. Develop protocols to ensure effective communication between members and officers in their respective roles.	These are Covered in Part 7 of the Constitution and in the Access to Information protocol.			
9. Set out the terms and conditions for remuneration of members and officers and an effective structure for managing the process including an effective remuneration panel (if	The scheme of Member allowances has been reviewed by the Constitutional Working Group (CWG) and there have been two interim reports recommending changes to the allowances scheme. As at the end of March 2009, the scheme was subject to a further review. This has since been reported to Full Council in May 2009. The scheme is published annually in accordance with the relevant 2003 regulations			

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CORE PRINCIPLE 2 - Members and	officers working together to achieve a common purpose with clearly defined functions and roles	
The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
applicable).		
10. Ensure that effective mechanisms exist to monitor service delivery.	The PerformancePlus system is now fully operational across the Council and a standard service planning template was refreshed in 2010 with a focus upon delivering the Improvement and Efficiency objectives.	
	An integrated quarterly Performance and Finance monitoring report is now produced. This is reviewed by the Executive, CMT and the Performance & Finance Select Committee.	
11. Ensure that the organisation's vision, strategic plans, priorities and targets are developed through robust mechanisms, and in consultation with the local community and other key stakeholders, and that they are clearly articulated and disseminated.	The principal mechanisms for stakeholder consultation include the Place Survey, completed 2008 and the Brent Residents' Attitude Survey, completed 2009. On-going consultation on the organisation's vision, strategic plans and priorities is undertaken through a number of established consultation mechanisms. These include five area consultative forums, six service user consultative forums, the Brent Youth Parliament and the Brent Citizens' Panel. The Citizens' Panel was refreshed through further rounds of recruitment using the 2008 Place Survey and the 2009 Residents' Attitude Survey. Panel membership now stands at just over 2,000. Outcomes of consultation are fed back through the Consultation Portal website. Promote council policy and services via The Brent Magazine, the council website and wider media. Use the staff magazine – Insight – the intranet, Brent Brief and Take 5 to communicate with staff. Launch of 'Bmyvoice' in March 2010, a website specifically for engaging and communicating with Brent's younger residents.	Improvements to area forums are being recommended as part of a review. A further round of recruitment to the Citizens' Panel is planned for July 2010. Improvements are being made to the Consultation Portal (Head of Consultation) Use of social media channels to be assessed in communicating with residents and staff.
12. When working in partnership ensure that members are clear about their roles and responsibilities both individually and collectively in relation to the	The term 'partnership' is defined in the Constitution and a partnership map has been established Protocols and guidelines for the operation of joint working have been agreed by the LSP and covers roles and responsibilities, protocols for financial administration and staff management. In January 2008 a partnership conference was held in Brent, addressed by the Local Government Ombudsman, to consider the issue of complaints within partnerships and a protocol for handling partnership complaints	

CORE PRINCIPLE 2 - Members and	ORE PRINCIPLE 2 - Members and officers working together to achieve a common purpose with clearly defined functions and roles		
The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer	
partnership and to the authority.	has been established.		
13. When working in partnership: ensure that there is clarity about the legal status of the partnership ensure that representatives or organisations both understand and make clear to all other partners the extent of their authority to bind their organisation to partner decisions.	So far guidance has been given on specific projects such as South Kilburn Neighbourhood Trust, WLA Joint Procurement Unit and other WLA initiatives.		

	CORE PRINCIPLE 3 - Promoting va and behaviour	RE PRINCIPLE 3 - Promoting values for the authority and demonstrating the values of good governance through upholding high st	
	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
Page 123	1. Ensure that the authority's leadership sets a tone for the organisation by creating a climate of openness, support and respect.	Executive members have undertaken a range of training including media and presentation skills and key members have had support from an external mentor. This will be ongoing. The Member Code of Conduct includes the 10 general principles of conduct, including respect for others, leadership and stewardship. The Constitution contains the Planning Code of Practice, Licensing Code of Practice, Code of Practice on Publicity and the protocol for Member Officer Relations. Members and Chief Officers work collaboratively on the Policy Coordination Group, Leader's Briefing, Service Planning and Budget Awaydays. The Leader meets weekly with the Chief Executive and also addresses the Corporate Roadshows and the Senior Managers Conference.	Training will be given to all new members following the local election in May 2010
	2. Ensure that standards of conduct and personal behaviour expected of members and staff, of work between members and staff and between the authority, its partners and the community are defined and	A new Code of Conduct for Officers was agreed in 2005. Other codes, including the IT Usage Policy and Harassment Policy are all held on the intranet and are subject to regular review. Staff are made aware of their responsibilities through general communications, such as the Chief Executive Newsletter, Insight Magazine and via attachments to payslips, as well as at team briefings. The Brent Member Code of Conduct reflects the model code published by the government.	
	communicated through codes of conduct and protocols.	, and generalized the second s	
	3. Put in place arrangements to ensure that members and employees of the authority are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders and put in place appropriate processes to ensure that they continue to operate in practice.	The Constitution contains various other codes including: Licensing, Planning, Member Officer relations. Advice notes are issued by the Borough Solicitor regarding conduct.	
		The registers of Members' interests and Members' gifts and hospitality are now placed on the web site enabling easy public access.	
		A new Conflict of Interest Policy for staff was issued in 2009/10 and is currently being rolled out. This provides clear guidance regarding contractual and other potential conflicts. A new Gifts and Hospitality Policy for staff has been issued.	Ensure new Conflict of Interest Policy and Gifts and Hospitality Policy are embedded
			Service Area Directors

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	CORE PRINCIPLE 3 - Promoting valued and behaviour	alues for the authority and demonstrating the values of good governance through upholding high	standards of conduct
	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
	4. Develop and maintain shared values including leadership values both for the organisation and staff reflecting public expectations and communicate these with members, staff, the community and partners.	The Member Code of Conduct includes reference to Leadership and Stewardship and other values. The Code of Conduct and competency framework which has been developed for managers and staff together with a management charter sets out the expected behaviours for officers, including Leadership and working with others.	
	5. Put in place arrangements to	Standards of conduct for Members are set out in the Constitution.	
	ensure that procedures and operations are designed in	Protocol for Member/officer relations is set out in Constitution.	
ם ב	conformity with appropriate ethical standards, and monitor their continuing effectiveness in practice.	Standards Committee has remit to monitor compliance.	
101	6. Develop and maintain an effective standards committee.	The terms of reference for the Standards Committee are set out in the Constitution. The Committee has an independent chair and vice chair., and two alternate independent members available The Committee has an annual work programme and is supported by the Borough Solicitor.	
•	7. Use the organisation's shared values to act as a guide for decision making and as a basis for developing positive and trusting relationships within the authority.	The organisation's shared values are reflected in various policies and procedures, such as the Planning Code of Practice and its Access to Information Rules, both which encourage transparent, informed and well reasoned decision making. These are reinforced by the guidance notes issued to members from time to time in the form of Monitoring Officer Advice Notes and in legal bulletins. The Corporate Strategy also includes clear corporate values for the Council. The One Council programme requires an explicit framework that recognises the importance of high standards in relation to personal behaviour, professional conduct and organisational governance.	
	8. In pursuing the vision of a partnership, agree a set of values against which decision making and actions can be judged. Such values must be demonstrated by partners' behaviour both individually and collectively.	As part of the process for agreeing the 35 improvement priorities for the LAA partners, there is a commitment to a number of values around addressing inequality, focusing on preventative actions and delivering value for money through the LAA. They have also signed up to a 'Compact Agreement' setting out the principles for partnership working and how they engage with the voluntary and community sector.	

The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed Address Weaknesses and responsible office
Develop and maintain an effective scrutiny function which encourages	The Executive are responsible for the implementation of policy and ensuring the effectiveness of service delivery.	
constructive challenge and enhances the organisation's performance	Scrutiny is responsible for monitoring the performance of the Executive.	
overall and of any organisation for which it is responsible.	The Corporate Management Team monitor delivery of the One Council programme through a Programme Board and a Programme Management Office.	
	The Chair of Overview and Scrutiny is given an opportunity to report back to every full Council meeting. Call in arrangements in the Constitution allows Overview and Scrutiny to review decisions made by the Executive. Forward Plan Select Committee is able to scrutinise decisions before they are made.	
2. Develop and maintain open and effective mechanisms for documenting evidence for decisions and recording the criteria, rationale and considerations on which decisions are based.	Decision making arrangements are set out in the Constitution. The Council operates a Leader and Cabinet (Executive) model of decision making. Although some decisions are reserved for Full Council, most are made by the Executive or by committees, sub-committees or officers. There are currently no decision making powers delegated to individual Members. In accordance with the Local government Act 2000, the Council has mechanisms in place to allow the effective, independent and rigorous examination of the proposals and decisions by the Executive. These mechanisms involve the Overview and Scrutiny process including call-in and question time. The conduct of the Council's business is governed by the Constitution, which includes Standing Orders and Financial Regulations.	
	Decision making meetings of the Executive are open to the public.	
	Copies of reports and decisions are available on the intranet and through the One Stop Shop and Libraries.	
	All meetings are clerked by well trained and experienced committee support officers and lawyers are present to provide advice on law and procedure.	
3. Put in place arrangements to safeguard members and employees	The registers of Members' interests and gifts and hospitality are now placed on the web site enabling easy public access.	
ainst conflicts of interest and put in ice appropriate processes to sure that they continue to operate practice.	The Monitoring Officer prepares an annual report to the Standards Committee.	

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informed transparent decisions which are subject to effective scrutiny and managing risk		Faking informed and
The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
4. Develop and maintain an effective audit committee (or equivalent)	The Audit Committee has met quarterly during the year. The terms of reference are set out in the Constitution.	
which is independent or make other appropriate arrangements for the discharge of the functions of such a committee.	The provision of the internal audit function within the Council is through the Audit & Investigations Team, working in partnership with Deloitte & Touche Public Sector Internal Audit Ltd. The Audit Committee approve the annual Internal Audit Plan and receive progress reports at each quarterly meeting.	
	External audit is provided by the Audit Commission. Their plans, interim reports and annual audit letter are all presented to the Audit Committee.	
5. Put in place effective transparent and accessible arrangements for dealing with complaints.	The Council has a well regarded corporate complaints procedure that has been praised and endorsed by the Local Government Ombudsman (LGO), as set out in the annual LGO letter and our annual report on complaints which is submitted to the Overview and Scrutiny Committee.	
	Complaints are initially handled by service area managers and, if appealed, by trained complaints officers within departments. A central team is also in place with the Policy & Regeneration Unit to handle escalated complaints on behalf of the Chief Executive and to oversee the process as a whole.	
6. Ensure that those making decisions whether for the authority or partnership are provided with information that is fit for the purpose – relevant, timely and gives clear explanations of technical issues and their implications.	Members are required to make sound decisions based on written reports which are prepared in accordance with the report writing guide and have to be cleared by both Finance and Legal. The Executive receives a briefing (Leaders Briefing) two weeks prior to the Executive meeting when members can ask detailed technical questions of officers.	
7. Ensure that professional advice on matters that have legal or financial implications is available and recorded well in advance of decision making and used appropriately.	All reports must be cleared by Finance and Legal and contain financial and legal implications. Legal and Finance officers are available as needed to give clear robust advice	
8. Ensure that risk management is embedded into the culture of the organisation; with members and managers at all levels recognising	The Risk Management Strategy has been revised and was presented to Audit Committee in December 2008. A revised Corporate Risk Guidance document has also been produced and circulated across the Council. Risk management training for Members took place in March 2009. As per the revised Strategy, Members have a key role in the management of risk via the following:	Further work to be done on the development of positive risk

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informe transparent decisions which are subject to effective scrutiny and managing risk		Taking informed and
The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
that risk management is part of their job.	 The Deputy Leader and Lead Member for Corporate Resources have overall responsibility for ensuring that working risk management processes are in place; The Executive / Council consider risks as part of their decision making role on corporate policies, including the annual budget setting processes, major policy decisions and major projects; and The Policy Co-ordination Group, combining the Executive and Corporate Management Team, review corporate risks through regular Corporate Hotspots monitoring reports. Links to Business Continuity established. Additional guidance on project risk provided Additional training provided to DMTs and corporate risk owners. Participation monitored. 	guidance however the latest training provided to DMTs and Corporate Groups included some advice on the need to consider positive risk aspects as part of the evaluation process (Head of Procurement Strategy & Risk Management / Assistant Director of Regeneration / Head of Emergency Planning & Business Continuity) E-learning tool not yet developed, additional work required to specify the level and variety of training to be offered. (Head of Procurement Strategy & Risk Management)

The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
	Corporate Hotspots include the highest category – likelihood and impact – of cross-council level and service area level risks, e.g. significant risks to the achievement of key strategic objectives, to the finances of the authority, to the health and well-being of residents and/or staff, or to the reputation of the authority.	
	Financial Hotspots are identified and reviewed across each of the Service Areas on a monthly basis by the Strategic Finance Group. In each case the risk is assessed in terms of the minimum and maximum impact from a monetary perspective.	
	In addition, an indication is provided as to whether the risk has been included in the year-end forecast for each Service Area, thereby providing a link between risk management and budget monitoring.	
	Risks are also identified as part of the budget setting process. Major spending risks were identified for 2009/10 and in each case a 'worst case' monetary figure was recorded and reported at SFG.	
	A consistent, standard risk template has been devised and is utilised for the drafting of Service Plan related risk. Risks are linked to both Service Plan objectives and Council objectives. Reporting cycles established, reports provided to Corporate Groups to match meeting cycle. Feedback gathered. Risks evaluated and amended where appropriate	(Head of Procurement Strategy & Risk Management) Assurance framework to be full developed. (Head of
		Procurement Strategy & Risk Management / Internal Audit)
	Risks within the One Council programme are fully documented within the reporting framework of the programme. These are reported fortnightly to the Programme Board. A risk log is maintained on a separate Excel spreadsheet. These are project risks and are not separately identified within the Risk Register. Operational risk arising from the One Council change programme will be recorded in departmental registers.	
9. Ensure that arrangements are in place for whistle blowing to which	There is a Whistleblowing Policy in place. This has been publicised to staff and is on the intranet under 'Raising Concerns'.	

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk transparent decisions which are subject to effective scrutiny and managing risk		Taking informed and	
•	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
	the authority have access.		
	10. Actively recognise the limits of lawful activity placed on them by, for example the ultra vires doctrine but also strive to utilise powers to the full benefit of their communities.	See above section 6. In addition regular Monitoring Officer Advice Notes are issued. Regular training is provided to ensure Members understand areas of risk	
u	11. Recognise the limits of lawful action and observe both the specific requirements of legislation and the general responsibilities placed on local authorities by public law.	See above section 6. In addition regular Monitoring Officer Advice Notes are issued. Advice is tailored and specific regarding the Authority's capability and capacity to take relevant action including liability of the organisation	
120 120	12. Observe all specific legislative requirements placed upon them, as well as the requirements of general law, and in particular to integrate the key principles of good administrative law – rationality, legality and natural justice into their procedures and decision making processes.	Legal comment and consultation on reports. Monitoring Officer Advice Notes issued and Legislation Trackers in place.	

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	CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective		
	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
ָ ֪֖֖֡	1. Provide induction programmes tailored to individual needs and opportunities for members and officers to update their knowledge on a regular basis.	The Council runs a Member development programme which is reported to the Standards Committee annually. The Borough Solicitor provides training to new and existing Members on decision making and standards of conduct. The Council has a Corporate Learning & Development Plan and programme which is reviewed and evaluated on an annual basis to meet the strategic and service objectives of the Council. The programme is also developed on the basis of a training needs analysis of individual staff as a result of annual performance appraisal. Each new member of staff is required to undergo induction training. However, induction rates are still below 100%.	A concerted plan to ensure all new starters attend mandatory induction is required. CMT to monitor and ensure compliance within departments. (Head of Learning & Development and Strategic HR Managers)
100	2. Ensure that the statutory officers have the skills, resources and support necessary to perform effectively in their roles and that these roles are properly	Officers have an annual appraisal containing developmental objectives linked to the Corporate Strategy and Departmental Service Plans. The Council's Corporate Learning and Development Plan and service offering are based on the needs identified in individual appraisals and Service Plans. Workforce Development Plans have now been completed for all Service Areas including current and future skills and staffing requirements.	
	understood throughout the organisation.	Each role has a job description and role specification.	
	3. Assess the skills required by members and officers and make a commitment to develop those skills to enable roles to be carried out effectively.	As part of the development of departmental Service Plans and Workforce Development Plans, analysis is being undertaken to identify the skills required for future service delivery to ensure that officers are fully skilled to deliver quality services.	
		Whilst many areas/professions have a clear career structure, work is being undertaken to develop career pathways, generic job roles and a talent management system. A new management development centre has been established to assist in the further development of junior and middle managers. The current workforce development planning work includes succession planning. A Talent management and succession planning scheme was approved by CMT in March 2009. The development of job families and generic job roles is being addressed via a One Council project covering Remuneration and Performance issues.	Staffing and structure review project and remuneration and performance review will address career and talent management frameworks for the organisation going (Assistant Director,

	CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective			
	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer	
			HR)	
	4. Develop skills on a continuing basis to improve performance including the ability to scrutinise and challenge and to recognise when outside expert advice is	The Learning & Development Plan and service offering reflect the skills and knowledge required to deliver the corporate strategy and is reviewed on an annual basis to ensure continuing improvement and alignment to the goals of the Council. Individuals are encouraged to develop through their annual appraisal, six monthly reviews and regular one-to-ones which focus on improving performance and achievement of corporate/departmental objectives.	Achieving higher levels of staff appraisal is a priority for the organisation to focus on improving performance. A review of the appraisal scheme to improve implementation and quality is required. (Head of Learning & Development)	
	needed.	A new appraisal system has been developed based on the competency framework which includes providing a customer focussed service, and leadership and influencing skills. The corporate training offering also offers courses on customer care and working with partners.		
י		As indicated above, the Council has an annual corporate Learning & Development programme based on strategic objectives including the Council's performance improvement priorities. A national performance management training programme has recently been piloted for staff in conjunction with the corporate Policy and Performance team.		
		The annual review of the Member development programme was reported to the Standards Committee in March 2009.		
<u>.</u>	5. Ensure that effective arrangements are in place for reviewing the performance of the authority as a whole and of	Standards for performance are set out in the Corporate Strategy and individual Service Plans. Quarterly reports on service and financial performance are produced and considered by the CMT, Executive and Performance & Finance Select Committee. This includes performance on key partnership targets within the LAA.		
	individual members and agreeing an action plan which might for	A summary of the Council's performance is published each year in the Brent Magazine and delivered to all households.		
	example aim to address any training or development needs.	All performance data is available on the Council's website.		
	6. Ensure that effective arrangements designed to encourage individuals from all	Area and Service User Consultative forums (ACfs and SUCfs) are chaired by Members and supported by lead officers from the service areas. SUCfs include: Pensioners forum; Black and Minority Ethnic forum; Voluntary Sector forum; Private	Improvements in the running of area forums are being	
	sections of the community to engage with, contribute to and	Sector Housing forum; and Brent Disabled User forum. The Brent LINK (Local Information Network) was set up in July 2008.	planned as part of a review.	
	participate in the work of the authority.	A new partnership Brent Engagement Strategy 2010-2014 has been developed.	The work of the Brent LINk is scrutinised through a contract monitoring process.	

CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective				
	The local code should reflect the requirements for local authorities to:	Position at March 2010		
			New Engagement Strategy to be launched at the end of May 2010 (Head of Consultation)	
		The Youth Parliament has been operating since March 2007 and provides an opportunity for children and young people to present their views to the Council. The Youth Parliament has been operating since March 2007 and provides an opportunity for children and young people to present their views to the Council.		
Pa		Brent Youth Parliament worked on the development of a website specifically for young people in the borough. 'Bmyvoice' was launched in March 2010.		
age 132		Regular ward meetings provide a forum for Members to discuss matters of concern with officers and shape how services are provided at the neighbourhood level. Depending on the issues being addressed, these meetings may be attended by the Police and other relevant partner agencies.		
		All committee meetings are held in public, with the exception of any elements relating to exempt or confidential information.		
	7. Ensure that career structures are in place for members and officers to encourage participation and development.	Whilst many areas/professions have a clear career structure, work is being undertaken to develop career pathways, generic job roles and a talent management system. A new management development centre has been established to assist in the further development of junior and middle managers. The current workforce development planning work includes succession planning. A Talent management and succession planning scheme was approved by CMT in March 2009.	Complete work in relation to career pathways, generic job roles and talent management. (Assistant Director, HR) Talent management scheme to be introduced during 2009/10. (Assistant Director, HR)	

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CORE PRINCIPLE 6 - Engaging with local people and other stakeholders to ensure robust public accountability			
The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer	
Make clear to themselves, all staff and the community, to whom they are accountable and for what.	Council policy and services are promoted to residents via The Brent Magazine produced monthly, the Council website and wider media. Neighbourhood Bulletins are produced for each of the 21 wards twice a year to directly communicate response to issues raised by local residents. Use the staff magazine - Insight, the intranet, and internal briefing programme to communicate with staff. Brent Brief, a fortnightly briefing document to allow managers to deliver corporate, service area and team information was introduced in March 2009. Take 5, a fortnightly e-bulletin to all staff was introduced in	Continue using and further developing / improving all forms of communication. (Director of Communication & Diversity)	
2. Consider those institutional stakeholders to whom they are accountable and assess the effectiveness of the relationships and any changes required.	January 2010. A new Consultation & Engagement Strategy, Brent Engagement Strategy2010 – 2014 has being developed in line with the new duty to inform, consult and involve, and the requirements of the Comprehensive Area Assessment (CAA) process. The Consultation Portal will be further developed to establish more effective ways of evaluating consultation activity.	Strategy to be published at the end of May 2010. Consultation Portal to include a Consultation Diary and a News Centre (Head of Consultation)	
3. Produce an annual report on scrutiny function activity.	An annual report is presented to the Overview & Scrutiny Committee in July each year.		
4. Ensure that clear channels of communication are in place with all sections of the community and other stakeholders including monitoring arrangements to ensure that they operate effectively.	The Brent Consultation Board, established 2009, scrutinises all major consultation projects. The Consultation Board has overseen the development of the new Brent Engagement Strategy. New strategy promotes evaluation of consultation and engagement activity.	Core training on consultation strategy and techniques being developed. (Head of Consultation)	
5. Hold meetings in public unless there are good reasons for confidentiality.	All meetings are held in public. Some parts of meetings are held in private when exempt or confidential information might be disclosed. This is subject to the agreement of the members present.		

	CORE PRINCIPLE 6 - Engaging v	RE PRINCIPLE 6 - Engaging with local people and other stakeholders to ensure robust public accountability			
	The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer		
Dogo 104	6. Ensure arrangements are in place to enable the authority to engage with all sections of the community effectively. These arrangements should recognise that different sections of the community have different priorities and establish explicit processes for dealing with these competing demands.	As per Core Principle 5, section 6, Brent's consultation network includes area and service user consultative forums, the Brent Youth Parliament and the Brent Citizens' Panel and the Brent LINk (Brent Local Information Network). Service user consultative forums cover Pensioners, Black and Minority Ethnic, Voluntary Sector, Private Sector Housing and Disabled Users. Other consultation, voluntary sector and user groups are currently being mapped by the Consultation Team.	Mapping of other consultation and voluntary sector groups is ongoing. (Head of Consultation)		
		2009 Residents' Attitude Survey undertaken in 2009. The results of the 2009 Residents' Attitude Survey were published in the December 2009 issue of The Brent Magazine.	Residents' Attitude Survey findings available on council website (Head of Consultation)		
	7. Establish a clear policy on the types of issues they will meaningfully consult on or engage with the public and service users including a feedback mechanism for those consultees to demonstrate what	A Communication Strategy 2007-2010 has been agreed by CMT.	A Communication Strategy to support the Corporate Strategy will be produced for 2010- 2014.		
	has changed as a result.	All major consultations need to be referred to the Consultation Board at the planning stage. New Brent Engagement Strategy sets out standard for ensuring proper feedback to consultees.	Further development of consultation portal in progress. (Head of Consultation)		
	8. On an annual basis, publish a performance plan giving information on the authority's vision, strategy, plans and financial statements as well as information about its outcomes, achievements and the satisfaction of service users in	The Annual Review was published in October 2009 as part of The Brent Magazine.			

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The local code should reflect the requirements for local authorities to:	Position at March 2010	Actions Needed to Address Weaknesses and responsible officer
the previous period.		
9. Ensure that the authority as a whole is open and accessible to the community, service users and its staff and ensure that it has made a commitment to openness and transparency in all its dealings, including partnerships subject only to the need to preserve confidentiality in those specific circumstances where it is proper and appropriate to do so.	All Committee Reports, Agendas and Minutes are made available through the council's web site.	
10. Develop and maintain a clear policy on how staff and their representatives are consulted and involved in decision making.	The Council's managing change policy includes guidance on staff and trade union consultation. A draft engagement policy has also been developed. The role of the line manager in people management has been documented and is shortly to be published which includes guidance on engagement. The content of this is being incorporated into the Council's new people management courses.	

4 Review of Effectiveness

- 4.1 The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the executive managers within the authority who have responsibility for the development and maintenance of the governance environment, the Head of Internal Audit & Investigation's Annual Report and also by comments made by the external auditors and other review agencies and inspectorates.
- 4.2 The process that has been applied in maintaining and reviewing the effectiveness of the governance framework, is described below:

The Council

- Has monitored performance against the Corporate Strategy Objectives by taking an annual report and has set the annual budget in accordance with the Corporate Strategy priorities;
- Receives the annual budget report which summarises the financial position and the transactions for the year and considers the annual performance plan; and
- Has agreed a Constitution which sets out the decision making structure, delegated authority, standing orders and financial regulations. These underpin the internal control framework.

The Executive

- Makes key decisions in accordance with the Budget and Policy Framework:
- Has sessions with the Corporate Management Team twice per year to consider the medium term financial strategy and its linkages with the council's policy priorities; and
- Meets monthly with the Corporate Management Team to receive an update on the Council's financial position and monitoring reports from the Strategic Finance Group.

The Audit Committee

- Has met four times during 2009/10 and has considered the work of Internal Audit during the year, the Head of Internal Audit's annual report and opinion and the External Auditor's annual letter;
- Maintains an overview of the Council's Constitution in respect of contract standing orders and financial regulations;
- Monitors the effective development and operation of risk management and corporate governance in the Council; and

- Reviews the annual statement of accounts. Specifically to consider whether appropriate accounting policies have been followed and whether there are concerns arising from the financial statements or from the audit that need to be brought to the attention of the Council.
- Monitors the Council's Treasury Management policies.

The Standards Committee

 Receives reports from the council's Monitoring Officer on issues concerning member conduct and would consider reports referred from Ethical Standards Officers or the Monitoring Officer which require investigation and/or determination.

The Forward Plan Select Committee

• Enables pre-scrutiny of Executive decisions by non-executive members.

Overview & Scrutiny

- Oversees and scrutinises decisions made by the Executive;
- Has cross cutting sub-committees to examine detailed performance information on a six monthly basis, namely the Health Select Committee, Childrens Select and the Performance & Finance Committee.

The Performance & Finance Select Committee

 Receives reports on budget monitoring and considers the Annual Performance Plan and quarterly "Vital Signs" document. It also considers individual areas such as Adult Social Care, Waste Strategy, Customer Contact and Revenues and Benefits.

Budget Panel

 Is a sub-committee of Overview & Scrutiny and participates in the budget setting process by examining the robustness of the budget; the ability to deliver savings; key revenue budget outputs and decisions; and key capital budget outputs and decisions.

Audit & Investigations

- Provide assurance to the Council on operational and financial controls via delivery of an agreed audit plan;
- Produce an Annual Audit Report including the Head of Audit annual opinion on the Council's internal controls; and
- Where identified as a result of audit work, significant internal control
 weaknesses have been reported to Service Directors and copied to the
 relevant Service or Corporate Area Director. Recommendations for
 improvement are made in each report. Each significant audit report is
 followed up after a suitable period and any failure to implement
 recommendations is noted and reported back to the relevant director and
 the Audit Committee.

External Audit

- The Director of Finance & Corporate Resources meets with the Council's external auditors on a monthly basis and, if appropriate, they raise any concerns they have regarding the internal control environment. These meetings become more frequent during the closing of the accounts process when any material weaknesses or issues are raised.
- 4.3 We have been advised on the implications of the result of the review of the effectiveness of the governance framework by Audit Committee and a plan to address weaknesses and ensure continuous improvement of the system is in place.

5. Significant Governance Issues

5.1 Set out below are a number of significant governance issues which have been identified, together with a summary of the actions taken to date, or which are being proposed for 2010/11 to deal with these.

We have included an indication as to the progress made against those issues raised in the 2008/09 Annual Governance Statement.

- The One Council programme is now well underway with robust governance arrangements. Delivery against this programme is fundamental to the financial health of the council and delivery of efficient and effective services to the public. This will remain the key area of focus for the council.
- The Council is also progressing with the construction of a new civic centre and with a significant schools expansion programme under the Building Schools for the Future (BSF) programme. This major transformation agenda will require significant levels of resource and co-operation from staff across the Council.
- From a treasury management perspective, the collapse of the Icelandic banks left the Council with two outstanding deposits: one for £10m with Heritable Bank and one for £5m with Glitnir Bank. The Council has been working with other local authorities, the Local Government Association (LGA) and other organisations such as the Chartered Institute of Public Finance and Accountancy (CIPFA), to recover the two loans or to mitigate the effects of non-recovery until the situation is resolved. Members have been updated on the position throughout and the Treasury Management Strategy and Annual Investment Strategy for 2009/10 reflected this. To date £3.5 million has been recovered from Heritable Bank and the latest estimate is that 90% in total will be recovered. In relation to Glitnir, the full amount will be refunded if the Council's status as a preferred creditor is determined by the Icelandic Courts.
- There is, however, significant uncertainty concerning the new Government's
 plans to cut public spending and how this may impact upon the council's
 ability to deliver against its priorities. Specifically, there are risks concerning
 continued delivery of the BSF programme and the impact this may have on
 the provision of adequate school places across the borough.

- Environment & Culture continue to recognised monitoring and forecasting of income as a key risk. This was identified in last year's AGS and requires more sophisticated models of the financial performance in waste management, the parking account and income associated with property.
- The Social Care Placements within Children and Families reported a significant budget overspend. Measures for resolving this were actioned which included a reduction in forecast overspending and securing budget growth through the 2009/10 budgeting process and reviewing the service through a Gold project in the One Council Programme.
- Some concerns remain regarding the governance arrangements across schools and the council are taking steps to ensure these are robust with an internal audit programme which now includes all foundation schools.
- Adult Social Care has had significant difficulties in managing its overall budget in recent years. There was a significant overspend in 2008/09 and this remains so in 2009/10. Overspending budgets are identified and this is fed into the budget setting process for the following year. All appropriate measures are taken to control overspending during the year, but this can conflict with the rising number of clients who meet the council's eligibility criteria being entitled to a care service. Measures to control discretionary spending have been of limited effectiveness in the past and proposals to deliver efficiencies have been delayed. Budget monitoring in this area is currently being reviewed.
- 5.2 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed:				
	Councillor Ann John	Gareth Daniel Chief Executive		

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Audit Committee 15 June 2010

Report from the Director of Finance and Corporate Resources

For Information

Wards affected:

ALL

Internal Audit Annual Report 2009/10

1. Summary

1.1. This report is the annual report from the Head of Internal Audit. The report includes an opinion on the overall adequacy and effectiveness of the Council's internal controls and presents a summary of the audit work undertaken during the year.

2. Recommendations

2.1. The Audit Committee note the content of the report.

3. Detail

- 3.1. The Accounts and Audit Regulations 2003¹, as amended, require the Council to maintain an adequate and effective system of internal audit of its accounting records and of its system of internal control. The role of internal audit is to provide an independent and objective opinion on the control environment within the Council. Internal audit work is undertaken in accordance with the CIPFA Internal Audit Code of Practice 2006² ("the code"). The code sets out a number of elements to be included in an annual report from the Head of Audit. These are:
 - An opinion on the overall adequacy and effectiveness of the internal control environment
 - Any qualifications to the opinion
 - A summary of audit work undertaken
 - Any issues particularly relevant to the Annual Governance Statement
 - A comparison of the work undertaken against the plan and performance issues

• A comment on compliance with the CIPFA code

Opinion of the Head of Audit and Investigations

- 3.2. "I have considered all of the work conducted by internal audit staff, the council's audit contractor, Deloitte and Touche Public sector Internal Audit Ltd and fraud investigation staff for the year ended 31st March 2010 and work undertaken post year end. This includes oversight of all internal audit reports and fraud investigations and personal conduct of specific projects. In my opinion with the exception of those areas where limited assurance was given, the controls in place in those areas reviewed are adequate and effective. Where weaknesses have been identified, these are being addressed by management and followed up by Internal Audit.
- 3.3. In addition, I have had oversight of the process by which the Annual Governance Statement has been completed. This is the third year in which an Annual Governance Statement has been required and I am satisfied that the process to produce the statement is robust. I am satisfied that the content of the statement is accurate and its completion has complied with the relevant CIPFA guidance. Any issues which I have judged relevant to the preparation of the Annual Governance Statement have been included.

Qualifications to the Opinion

3.4. My opinion is not qualified. I note the decreased proportion of substantial assurance audit reports in comparison to the previous year. However, there has been no deterioration in assurance where repeat audit work has been undertaken and significant improvmenets in a number of areas. The key financial systems audited in 2009/10, Council Tax, NNDR and Payroll all attained substantial assurance."

Summary of work undertaken

- 3.5. The 2009/10 Audit Plan was approved by the Audit Committee on 4th March 2009³. The plan allocated 1,166 audit days across all areas of the council's operation, including 128 within Brent Housing Partnership. A further 45 days were brought forward from the previous years plan. Total planned coverage was 1,211days.
- 3.6. At the end of March 2010, 1,152 days had been delivered representing 95% of the audit plan.
- 3.8 Audit work focused on the reliability of the financial and operational information, management accounting controls, safeguarding of assets, economy and efficiency of operations and review of compliance with relevant statutes and Council regulations.
- 3.7. For each audit where controls have been analysed, an assurance statement is issued. This simple grading mechanism indicates the level of confidence

we have in the controls within the area audited. Each category is defined below:

Full Assurance	There is a sound system of control designed to achieve the client's objectives. The control processes tested are being consistently applied.
Substantial Assurance	While there is a basically sound system of internal control, there are weaknesses, which put some of the client's objectives at risk. There is evidence that the level of noncompliance with some of the control processes may put some of the client's objectives at risk.
Limited Assurance	Weaknesses in the system of internal controls are such as to put the client's objectives at risk. The level of non-compliance puts the client's objectives at risk.
No Assurance	Control processes are generally weak leaving the processes/systems open to significant error or abuse. Significant non-compliance with basic controls leaves the processes/systems open to error or abuse.

3.8. The following table indicates the audits completed and relevant levels of assurance during the 2009-10 financial year:

Table 1: List of completed audits for 2009/10 and levels of assurance				
	Audit	Assurance		
1	Veolia Contract Management / Recycling	Substantial		
2	Frameworki Financial Module Post Implementation (IT)	Substantial		
3	Stonebridge Estate – Hyde Contract Management	Substantial		
4	Traffic Management – Notifications	Substantial		
5	Blue Badges	Substantial		
6	Pensions Application (IT)	Substantial		
7	Windows Operating System (IT)	Substantial		
8	Appointeeships and Deputyships	Substantial		
9	Grants to Voluntary Organisations	Substantial		
10	Transportation	Substantial		
11	E-Recruitment Post Implementation (IT)	Substantial		
12	Council Tax	Substantial		
13	NNDR	Substantial		
14	Payroll	Substantial		
15	Internal Financial Controls F&CR	Substantial		
16	Contact Point (IT)	Substantial		
17	CRM Post Implementation Review	Substantial		

Table 1: List of completed audits for 2009/10 and levels of assurance				
	Audit	Assurance		
18	Insurance	Substantial		
19	Houses in Multiple Occupation	Substantial		
20	Home Care – Contract Management	Limited		
21	Recruitment	Limited		
22	Joint Commissioning	Limited		
23	Complaints	Limited		
24	Private Sector Procurement Team	Limited		
25	Section 106	Limited		
26	Registration and Nationality Service	Limited		
27	Children's Centres Financial Management	Limited		
28	Treasury Management	Limited		
29	Corporate Health & Safety	Limited		
30	Cash Receipting Application (IT)	Limited		
31	Internal Financial Controls – Business Transformation	Limited		
32	Disaster Recovery Planning Provisions	Limited		
33	iCasework Application – Support Arrangements	Limited		
34	Oracle I-Procurement Sanity Check	N/A		
35	Sundry Debt Recovery Team	N/A		
36	Traffic Management - London operational Pilot Scheme	N/A		
37	Supporting People Programme Grant	N/A		
38	Carbon Reduction Commitment Energy Efficiency	N/A		
39	Safegaurding Adults Quality Assurance	N/A		
40	Adult Social Care – Reablement	N/A		
41	LAA Stretch Target	N/A		

Financial Management Standard In Schools

- 3.9. Since 1997 the government has required all secondary schools to be assessed against a financial management standard. This has applied to all primary schools by March 2010. The assessment requires an on site visit and inspection of various governance and financial control documents, measured against a standard framework. The Internal Audit team has undertaken a numebr of these assessments during the year. Schools are either assessed as having passed, failed or are given a conditional pass pending receipt of further evidence within 20 days.
- 3.10 During 2009/10, 22 schools were assessed as having passed the standard, 7

were given conditional passes and 1 failed.

Fraud Issues

- 3.11 In addition to internal audit work, the Audit and Investigations Team has responsibility for fraud investigation across the council. Fraud can impact upon the council's finances and may have implications for the systems of internal control.
- 3.12 Fraud affecting the council can be split between internal, committed by staff, or external, committed by third parties. As with all other large institutions in both the public and private sector, the council suffers from both.
- 3.13 The fraud case load is split over seven main areas. The 2009/10 case load statistics are shown in table 2 below.

Table 2: Fraud Case Load 2009/10				
Fraud Area	New Cases	Cases Closed	Cases Investigated	Fraud Identified
Housing Benefit*	634	758	330	154
Housing Tenancy Related	94	77	68	26
Blue Badge	18	32	22	9
Direct Payments	1	6	6	0
Single Person Discount	23	19	15	11
Other external / third party	17	15	14	10
Internal	34	22	19	12
Totals	821	925	474	224

- 3.14 In relation to housing benefit fraud the team completed investigations into 330 cases with fraud proven in 154 cases. The value of fraudulent overpayments (including DWP benefits) created as a result of investigations in 2009/10 was £1.93 million. Of this amount, £1.52 million relates to housing or council tax benefit. This is a significant increase on previous years' performance and reflects an ongoing strategy of dealing with higher value cases.
- 3.15 There are a number of options available when considering disposal of housing benefit fraud cases. In all instances a fraudulent overpayment will be identified and the Revenues and Benefits Service will attempt to recover the full overpayment. In addition, a number of sanctions are available to the Council, these are: Formal cautions, administrative penalties and prosecution. The sanction sought is determined by a number of factors including the amount and duration of the offence, aggravating and mitigating factors.
- 3.16 A formal caution is issued by Local Authority staff at an interview with the claimant and is used for low level offences. An administrative penalty is a fine of 30% of the overpayment and is added to the recovery of the overpayment. This is used in mid-range cases. Prosecution is reserved for more serious

cases and is either undertaken by the Council's Legal Service or the Solicitors Branch of the Department of Work and Pensions. In order to apply any of these sanctions, each case must be investigated, from its inception, to a prosecution standard. A total of 81 sanctions were applied to cases closed during 2009/10. These are summarised below:

Table 3: Housing Benefit Sanctions 2009/10	
Sanction	2009/10
Prosecutions	36
Administrative Penalties	40
Cautions	5
Total	81

- 3.17 In relation to housing tenancy fraud the team received 94 new referrals and completed investigations into 68 cases. As a result of these investigations the team recovered 26 council properties. These recoveries have a significant financial impact on the housing revenue account and temporary accommodation budget.
- 3.18 Blue Badge fraud is a relatively new area of operation, its profile has been raised by the Audit Commission's National Fraud Initiative (NFI) data match of Blue Badges issued to the DWP deceased list. Some publicity around this type of fraud has generated a number of additional referrals from the public, who appear to be concerned by abuse of the scheme.
- 3.19 This abuse takes a number of forms. The lowest level is misuse of a badge by a family member when the badge holder is not present. This abuse is dealt with by the parking enforcement team and is not covered in this report. More serious offences such as persistent misuse, false applications for a badge, forged or counterfeit badges or misuse by a council officer are dealt with by Audit and Investigations. There were 18 new referrals in 2009/10 with 22 completed investigations. Fraud was identified in 9 of these. Most are dealt with by way of a warning letter from Older Peoples Services who issue the badges. There were four more serious cases resulting in one staff dismissal and three prosecutions. All prosecuted defendants received fines ranging from £130 to £350.
- 3.20 The NFI data match of Council Tax Single Person Discount claims to Electoral Register data provided a major source of new referrals. The match compared SPD claimants with information submitted for electoral registration purposes and identified where more than one person was registered to vote in a single property where an SPD claim existed. The council received some 3,600 matches, representing almost 10% of all SPD claimants. In order to deal with this volume of matches the Audit and Investigation Team piloted two separate approaches before recommending how the remaining matches should be dealt with by Revenues and Benefits. The intention was to investigate a sample of cases to prosecution standard where there was significant and deliberate fraud, with other minor cases being dealt with by way of recovery.

- 3.21 Over 3,500 of the matches have been checked, mostly by post and 1,260 discounts have been removed. This has increased the collectable council tax debt by some £830,000, including £385,000 relating to 2009/10. Revenues and Benefits have already recovered in excess of £230,000.
- 3.22 In relation to internal fraud there were 19 investigations completed during the year. Fraud or irregularity was established in 12 of these cases resulting in six dismissals at disciplinary and six resignations. These figures do not include Copland School which remains an open investigation whilst the police consider whether to mount a criminal investigation.

Issues relevant to the Annual Governance Statement

- 3.23 During the early part of 2009/10 a number of allegations were received about one of the council's foundation schools. The council has concluded its investigation into this matter and findings have been passed to the police for consideration of a possible criminal investigation. The internal investigation into this matter concluded that there had been significant governance failures by the governing body. However, the council took swift action to address the issues and placed the school under the control of an interim executive board. That board has taken appropriate steps to improve governance within the school.
- 3.24 There are no further matters which impact upon the Annual Governance Statement.

Compliance with the CIPFA Code of Practice for Internal Audit in Local Government

- 3.25 The CIPFA Code of Practice² is a non-statutory code. However, the Accounts and Audit Regulations 2003¹, as amended in 2006 require the Council to maintain an adequate and effective system of internal audit in accordance with proper internal audit practices. The guidance accompanying the Accounts and Audit Regulations specifies that proper practices are those contained within the CIPFA code. Internal Audit is, therefore, required to comply with the code.
- 3.26 The Internal Audit Team works in accordance with these standards and has a quality control mechanism which involves an internal quality review of all audit reports and ongoing supervision and appraisal of all staff.
- 3.27 The Accounts and Audit (amendment) Regulations 2006 placed a further requirement on the Council to, "at least once in each year, conduct a review of the effectiveness of its system of internal audit" and that, "the findings of the review referred...shall be considered, as part of the consideration of the system of internal control." CIPFA are yet to issue guidance on how such a review is to be undertaken. Some authorities have chosen to employ consultants to undertake the review, others use a peer review process whilst some rely on their audit committee. The work of the internal audit team has been reported to this committee on a regular basis, together with summaries

of audit work undertaken.

4. Financial Implications

- 4.1. None
- 5. Legal Implications
- 5.1. None
- 6. Diversity Implications
- 6.1. None

7. Background Papers

- 1. Accounts and Audit Regulations 2003
- 2. Code of Practice for Internal Audit in Local Government in the United Kingdom 2006 CIPFA
- 3. Report from the Director of Finance and Corporate Resources Internal Audit Plan for 2009/10, Audit Committee 4th March 2009.

8. Contact Officer Details

Simon Lane, Head of Audit and Investigations, Room 1, Town Hall Annexe. Telephone - 020 8937 1260.

DUNCAN McLEOD
Director of Finance and Corporate Resources