

Colchester Borough Council

Summary Internal Controls Assurance (SICA) Mid-Year Report

2020/21

December 2020

Summary Internal Controls Assurance

Introduction

1. This summary controls assurance mid-year report provides the Governance & Audit Committee with an update on the emerging Governance, Risk and Internal Control related issues and the progress of our work at Colchester Borough Council as at 30 November 2020. The period covered by this summary controls assurance report was significantly impacted by the COVID 19 pandemic, with quarter one audits moving to later quarters. Whilst the mid-year report would normally cover the period to 30 September, due to the pandemic and audit coverage primarily over the last three quarters of the year, it was felt relevant to extend the mid-year period to 30 November 2020.

Internal Audit Planned Coverage, Output and Key Messages

2. The 2020/21 Annual Audit Plan approved by the committee was for 300 days of internal audit coverage in the year. Good progress has been made, with a total of 144 days having been delivered as at 30 November 2020. Our progress against the Annual Plan for 2020/21 is set out in Appendix A.
3. The plan consists of a mix of assurance and appraisal reviews, with reports being generated for all audits carried out. This report outlines a summary of the audits as set out in Appendix B.
4. Progress is being made to implement and verify outstanding recommendations, as the year progresses this will require further management input.

Audits completed between 1 April and 30 November 2020

5. TIAA completed 10 audits in the period to 30 November 2020. The audits were designed to ascertain the extent to which the internal controls in the system are adequate to ensure that activities and procedures are operating to achieve Colchester Borough Council's objectives. For each assurance review an assessment of the combined effectiveness of the controls in mitigating the key risks was provided.

Summary of audits completed in the period

Assurance Assessments	Number of Reviews
Substantial Assurance	7
Reasonable Assurance	3
Limited Assurance	0
No Assurance	0

Summary of recommendations raised in the period

Urgent	Important	Routine	OEM
0	12	13	4

The areas on which the assurance assessments have been provided can only provide reasonable and not absolute assurance against misstatement or loss and their effectiveness is reduced if the internal audit recommendations made during the year have not been fully implemented.

6. The table below sets out details of audits completed.

Audits completed

Review	Evaluation	Key Dates			Number of Recommendations			
		Draft issued	Responses Received	Final issued	1	2	3	OEM
CBC2102 Business Support Grants – Part 1	Substantial	27/08/2020	01/09/2020	04/09/2020	0	0	0	0
CBC2103 COVID-19 Deep Dive	Substantial	03/08/2020	01/09/2020	04/09/2020	0	0	2	0
CBC2104 Housing	Substantial	24/09/2020	29/09/2020	08/10/2020	0	1	0	0
CBC2106 Corporate Health & Safety	Reasonable	02/10/2020	10/11/2020	12/11/2020	0	4	1	2
CBC2107 Contract Management	Reasonable	05/11/2020	23/11/2020	25/11/2020	0	2	5	1
CBC2109 Budget Monitoring and Reporting	Substantial	01/10/2020	06/10/2020	08/10/2020	0	0	1	1
CBC2111 CTAX and NNDR	Substantial	11/11/2020	-	-	0	0	1	0
CBC2112 Housing Benefit and CTS	Substantial	29/10/2020	30/10/2020	02/11/2020	0	0	1	0
CBC2113 Performance Management	Substantial	20/11/2020	20/11/2020	24/11/2020	0	0	1	0
CBC2131 Risk Management	Reasonable	12/11/2020	-	-	0	5	1	0

7. The Executive Summaries for each of the finalised reviews are included at Appendix B. The action plans for limited and no assurance reports are included with the summaries.
8. **COVID 19:** The progress against the planned work for the quarter has been disrupted by the COVID pandemic. In mid-March, when the potential scale and impact of COVID 19 was becoming evident it was agreed with Colchester Borough Council that the delivery of the internal audit service would be carried out remotely thereby minimising the need to physically access Colchester Borough Council's offices/premises and to hold face to face meetings.

Frauds/Irregularities

9. We have not been advised of any frauds or irregularities in the period since the last SICA report was issued.

Performance and Quality Measures

10. The following performance targets were used to measure the performance of internal audit in delivering the audit.

Performance Measure	Target	Attained
Completion of Planned Audits	100%	100%
Audits Completed in Time Allocation	100%	100%
Final report issued within 10 working days of receipt of responses	95%	100%
Compliance with Public Sector Internal Audit Standards	100%	100%

Other Matters

11. We have issued a number of briefing notes and fraud digests, shown in Appendix C, in the period.
12. We have reviewed recent guidance issued by the Internal Audit Standards Advisory Board (IASAB) in relation to internal auditing during the COVID-19 pandemic. The guidance aims to support heads of internal audit and individual internal auditors in continuing to meet their personal and professional responsibilities for conforming the UK Public Sector Internal Audit Standards (PSIAS). We can confirm continued conformance with the professional standards during this period.

Responsibility/Disclaimer

13. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. The matters raised in this report not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Release of Report

14. The table below sets out the history of this Mid-Year Report.

Date Report issued:	7 December 2020
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Progress against Annual Plan

System	Planned Quarter	Days	Current Status	Assurance Level
CBC2102 Business Support Grants – Part 1	2	8	Final Report issued	Substantial
CBC2103 COVID-19 Deep Dive	2	12	Final Report issued	Substantial
CBC2104 Housing	2	7	Final Report issued	Substantial
CBC2106 Corporate Health and Safety	2	10	Draft Report issued	Reasonable
CBC2107 Contract Management	2	10	Final Report issued	Reasonable
CBC2108 Licensing	2	12	Draft Report Prepared – Debrief 7/12/20	
CBC2109 Budget Monitoring and Reporting	2	12	Final Report issued	Substantial
CBC2111 CTAX and NNDR	2	14	Draft Report issued	Substantial
CBC2112 Housing Benefits and CTS	2	18	Final Report issued	Substantial
CBC2113 Performance Management	3	10	Final Report issued	Substantial
CBC2131 Risk Management	3	5	Draft Report issued	Reasonable
CBC2114 Planning and Development	3	12	In progress	
CBC2115 Key Financial Controls	3	10	Scheduled	
CBC2128 Management of Property	3	6	In progress	
CBC2110 Housing Rents	4	6	Scheduled	
CBC2116 HR and Payroll	4	14	Scheduled	

System	Planned Quarter	Days	Current Status	Assurance Level
CBC2117 Business Continuity	4	14	Scheduled	
CBC2118 Accounts Receivable and Cash Collection	4	12	Scheduled	
CBC2119 Site Cash ups	4	2	To be scheduled	
CBC2120 Single Data Sets	4	5	To be scheduled	
CBC2121 Museums	4	10	To be scheduled	
CBC2122 Parking Services	4	10	To be scheduled	
CBC2123 Leisure World	4	10	To be scheduled	
CBC2125 Business Support Grant Processes – Part 2	4	6	TBC	
CBC2126 CCHL / CBC Contract Management	4	8	To be scheduled	
CBC2127 CCH Allocated Days 15 less 12	4	3	TBC	
CBC2101 IT Network Resilience	4	12	To be scheduled	
CBC2105 IT Service Desk	4	10	To be scheduled	

KEY:





	To be commenced		Site work commenced		Draft report issued		Final report issued
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Executive Summaries

The following Executive Summaries and Management Action Plans are included in this Appendix. Full copies of the reports are available to the Governance & Audit Committee on request. Where a review has a 'Limited' or 'No' Assurance assessment the full report will be presented to the Governance & Audit Committee.

Executive Summary – Business Support Grants – Part 1

OVERALL ASSESSMENT	
<div><div><div>Adequate & effective governance, risk and control processes</div><div>SUBSTANTIAL ASSURANCE</div></div><div><div>SUBSTANTIAL ASSURANCE</div><div>REASONABLE ASSURANCE</div><div>LIMITED ASSURANCE</div><div>NO ASSURANCE</div></div></div>	
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE	
Incorrect payment of business grants due to incorrect or inconsistent application of grant conditions.	


KEY STRATEGIC FINDINGS	
	Administration of all three business grant schemes by the Council was subject to approval at Portfolio Holder level.
	Data extraction / validation checks have been applied for eligible businesses.
	BACS payments had been paid promptly and for the correct amounts.
	Grant spend is monitored against funding received from the Government.

GOOD PRACTICE IDENTIFIED	
	Government guidance on administering all three business grant schemes had been obtained and consistently applied.




SCOPE	
The aim of the audit was to review the Council’s administration of the Government’s business support grant schemes to ensure they have been paid to eligible businesses, paid promptly and for the correct amounts.	

ACTION POINTS			
Urgent	Important	Routine	Operational
0	0	0	0

Executive Summary – COVID-19 Deep Dive








OVERALL ASSESSMENT

ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE
<p>Inappropriate payments are made by Council as a result of controls not being maintained during the Covid-19 pandemic.</p>

SCOPE
<p>This review was a proactive review to identify payments made which may not have been made in accordance with Financial Regulations and/or provide Value For Money for the organisation.</p>

KEY STRATEGIC FINDINGS
<p> Weekly checks of new suppliers and amendments to suppliers have not been completed and recorded on a consistent basis during the period April to June 2020.</p>
<p> Instances were identified of overtime claims being submitted and approved for multiple periods in one claim, instead of being recorded against the day actually worked.</p>
GOOD PRACTICE IDENTIFIED
<p> The Council has enabled the majority of staff to work remotely from home, without significant changes to payment or payroll processes or reductions in controls.</p>

ACTION POINTS			
Urgent	Important	Routine	Operational
0	0	2	0






Executive Summary – Housing

OVERALL ASSESSMENT	KEY STRATEGIC FINDINGS								
	<div><div></div><div>The Allocations policy for Gateway to Homechoice choice based lettings scheme is in place and include detailed processes on allocating housing.</div></div> <div><div></div><div>The registration, bidding and offer processes are detailed on the Gateway to Homechoice website available to members of the public.</div></div> <div><div></div><div>Testing of housing register applications, verification, banding, bidding and allocation processes found no exceptions.</div></div> <div><div></div><div>The Gateway to Homechoice Financial Assessment, Verification and Referencing, and Renewal procedures were out of dates.</div></div>								
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE	GOOD PRACTICE IDENTIFIED								
<div>Not Applicable</div>	<div><div></div><div>A monthly summary is maintained by the Homechoice Manager to keep track of the teams’ progress in relation to applications and verifications processing time.</div></div> <div><div></div><div>Colchester Borough Council and other Partner Organisations carry out an annual renewal process to ensure applications are accurate and up-to-date.</div></div>								
SCOPE	ACTION POINTS								
<p>The review considered the joint arrangements between Colchester Borough Council (CBC) and Colchester Borough Homes (CBH) for the management and oversight of the Housing Register. The review also assessed the policies and procedure on housing register, housing register applications and verification processes, renewal, acceptance and rejection of applications, bidding, and shortlisting of applicants.</p>	<table><tr><th>Urgent</th><th>Important</th><th>Routine</th><th>Operational</th></tr><tr><td>0</td><td>1</td><td>0</td><td>0</td></tr></table>	Urgent	Important	Routine	Operational	0	1	0	0
Urgent	Important	Routine	Operational						
0	1	0	0						

Executive Summary – Corporate Health & Safety

OVERALL ASSESSMENT
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE
Not Applicable

SCOPE
<p>The objective of the audit was to review the systems and controls in place within Corporate Health and Safety in the Council, to help confirm that these are operating adequately, effectively and efficiently. The review assessed roles and responsibilities of the Health and Safety committee and Corporate Health and Safety Officer, written guidance on health and safety, health and safety management system, programme of regular inspections for all Council offices, and reporting of health and safety incidences.</p>

KEY STRATEGIC FINDINGS	
	Induction training was not conducted for new starters that joined the Council in March, April and May 2020.
	Site inspections were not completed in the first two quarters of 2020 due to the Covid-19 pandemic.
	Action plans from health and safety premises inspections were not always included in the Health and Safety Action Plan schedule and followed-up.
	Sample testing found that reported incidents were not always investigated by the designated managers.
GOOD PRACTICE IDENTIFIED	
	The Health and Safety Committee actively supports the Council's governance of health, safety and welfare.

ACTION POINTS			
Urgent	Important	Routine	Operational
0	4	1	2

Executive Summary – Contract Management

OVERALL ASSESSMENT
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE
N/A







SCOPE
The audit aimed to review the systems and processes in place for procuring, managing and monitoring contracts.

KEY STRATEGIC FINDINGS
<p>The Council does not have a Contract Exemption and Waiver register which include contracts exempted from the Contract procurement rules.</p>
<p>The Contract Register includes 357 active and inactive contracts that ended between 2015 and April 2020.</p>
<p>Contracts are managed by Contract Managers and information on contract completion is not always communicated with the Procurement team who manage the contract register.</p>
<p>The Procurement Strategy covers the period 2015 – 2017 and is due for renewal.</p>
GOOD PRACTICE IDENTIFIED
<p>Sample testing of procurement of nine contracts confirmed that the Contract Procedure rules were fully complied with for eight of the nine contracts tested.</p>
<p>A review of contract management processes for a sample of three Contracts confirmed that adequate contract management and monitoring processes were in operation for the sample tested.</p>

ACTION POINTS			
Urgent	Important	Routine	Operational
0	2	5	1

Executive Summary – Budget Monitoring

OVERALL ASSESSMENT
ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE
<p>Risk PR1 on Inability to deliver the budget strategy as planned is included in the Risk Register and mitigated.</p>
SCOPE
<p>The review confirmed if the Council's budget management and monitoring processes are effective and that financial performance is regularly tracked, variances explained and reported to senior management and Members.</p>

KEY STRATEGIC FINDINGS				
	The annual budgeted income for 2020/2021 is £17.96m however, due to the effects of COVID 19, income is now forecast as £9.763m.			
	Actions to address the income shortfall has been discussed and communicated with the Cabinet and Senior management and will be funded with Government support and use of reserves.			
	The Council's original Budget was agreed by the Cabinet in January 2020 and the Full Council approved the Budget in February 2020 and reforecast budget was approved by the Cabinet in June 2020.			
	Reports on effects of COVID 19 and on budget and income forecast were presented to the Cabinet members, Councillors and Senior Management Team.			
GOOD PRACTICE IDENTIFIED				
	The Budget Group meets twice a month to review and monitor the budget			
	Testing of a sample of 20 virements found that the virements request forms were raised and independently approved in line with the Scheme of Delegation			
ACTION POINTS				
Urgent	Important	Routine	Operational	
0	0	1	3	

Executive Summary – CTAX and NNDR

OVERALL ASSESSMENT







ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

ST4 Impact of COVID 19 pandemic - Ongoing impacts of the COVID-19 pandemic on the council, the communities, our customers and the economy.



SCOPE

The review assessed the effectiveness of the systems in place to ensure timely identification, collection and receipting of tax income (Council Tax and NNDR).

KEY STRATEGIC FINDINGS

-  Sample testing confirmed that processes and controls are in place for collecting, recording, reconciling, reporting Business rates and Council Tax and segregation of duties was evidenced.
-  Relevant information on payment of Business rates and Council Tax are available on the Council's website.
-  Quality assessment (QA) checks are carried out by the Business Rates Team Leader (for NNDR) and Council Tax Team Leader (For Council Tax) on processes carried out by the customer team staff members.
-  The Council Tax and NNDR parameters were entered to the system prior to the start of the financial year and independently checked for correctness.

GOOD PRACTICE IDENTIFIED

-  There are written procedures in place to provide guidance on Council Tax and NNDR processes and these are available to the staff members.
-  Monthly dashboards and service reports including Key Performance Indicators on Business rates and Council Tax are produced and reported to relevant staff and the Executive Team.

ACTION POINTS

Urgent	Important	Routine	Operational
0	0	1	0

Executive Summary – Housing Benefit and CTS

OVERALL ASSESSMENT



ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

Risk CO3 - Impact of the implementation of Universal Credit in Colchester could lead to additional work for CBC to help customers apply for the new single benefit. The future impacts of Covid-19 are likely to increase the number of vulnerable residents and claimants.

SCOPE

The audit reviewed the adequacy, effectiveness and efficiency of the systems and controls in place over Housing Benefit and LCTS.

KEY STRATEGIC FINDINGS



Sample testing of Benefits and LCTS claims assessment, payments over the threshold, reconciliations and Universal credit applications confirmed that effective controls and processes are in place.



Guide to Universal Credit and Council Tax rebates and Guide to Housing Benefits is available to Benefits Caseworkers and regular training is provided to the Benefits Caseworkers.



Impact of COVID 19 on Benefits and LCTS claims are properly documented and communicated across the Council.



The Council reported an average processing time of 9 days for new claims and 1 day for change of circumstances between January and March 2020.

GOOD PRACTICE IDENTIFIED



Sample testing of 25 new claims and changes in circumstances confirmed that assessments were done on a timely basis and Quality Assurance (QA) checks are regularly carried out.



Performance to date against two key KPIs: Time to process Housing Benefits new claims and changes and Time to process LCTS new claims and changes are below target.

ACTION POINTS

Urgent	Important	Routine	Operational
0	0	1	0

Executive Summary – Performance Management

OVERALL ASSESSMENT



ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

Risk SP5 on Staff Wellbeing relates to performance management. The risk notes that 'Staff wellbeing or motivation declines with an impact on service delivery and resilience'.

Risk SP4 on Compliance also relates to performance management and notes that 'Failure to protect public funds and resources – ineffective probity / monitoring systems/legislative breaches. Especially as a result of the rapid changes in service delivery required to respond to the impacts of Covid-19'.

SCOPE

The review established how performance is being monitored, managed, reported and confirmed if performance measures have been realigned (due to COVID).

KEY STRATEGIC FINDINGS



The Council has a Strategic Plan in place covering the period 2020 – 2023, which sets out how the Council will address the key challenges facing the borough through 5 strategic priority themes.



There is a Performance and Improvement Framework in place that includes a number of indicators which summarise overall performance in the Council.



The Council does not have individual service plans but the strategic plan includes performance indicators for all the key services in the Council.



There is a detailed appraisal guidance document in place, however the document is dated 2014 and is due for a review.

GOOD PRACTICE IDENTIFIED



SMART key performance indicators have been defined and are monitored and reported on a periodic basis.



Regular performance reporting is carried out to Senior Management Team, Performance Management Board, Leadership team, Scrutiny Panel and Cabinet. The reporting timetable is in place and available on the intranet.

ACTION POINTS

Urgent	Important	Routine	Operational
0	0	1	0

Executive Summary – Risk Management

OVERALL ASSESSMENT



ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE

Responsibility for risk management is clearly defined.

SCOPE

The objective of the audit was to review the systems and controls in place for Risk Management.

KEY STRATEGIC FINDINGS



The council have not defined their risk appetite and have not undertaken a risk maturity assessment.



A review of the risk registers need to be undertaken so that risks are smart, measureable mitigations are in place, it is clear what the current risk score for each risk is and the number of risks are manageable



Operational risk registers are the responsibility of Assistant Director to maintain. Not all services are maintaining their operational risk registers, a review of the format of the operational risk register is being undertake this will hopefully improve engagement.

GOOD PRACTICE IDENTIFIED



Responsibility for risk management is clearly defined, the Strategic Risk Register is subject to regular review. The Council's Management Strategy is subject to annual review and an annual risk management report is prepared.






ACTION POINTS



Urgent	Important	Routine	Operational
0	5	1	0

Briefings on developments in Governance, Risk and Control

TIAA produces regular briefing notes to summarise new developments in Governance, Risk, Control and Counter Fraud which may have an impact on our clients. These are shared with clients and made available through our Online Client Portal. A summary list of those CBNs and Fraud Alerts issued in the last three months which may be of relevance to Colchester Borough Council is given below. Copies of any CBNs are available on request from your local TIAA team.


Summary of recent Client Briefing Notes (CBNs)

CBN Ref	Subject	Status	TIAA Comments
CBN - 20004	Tips for Virtual Meetings and Video Conferencing during the COVID-19 Pandemic		No Action Required This briefing note has been provided for information only.
CBN - 20005	Housing Regulator Stresses the Importance of Effective Cyber Security Arrangements		Action Required Housing associations should continually obtain assurance that they have adequate controls in place to mitigate against the threat of cybercrime, particularly during current times when there is a heightened risk of fraud and changes in the way that people are working. This should include the areas of staff behaviours and awareness.
CBN – 20021	Risk of Redacted Information being Unredacted		Action Required Organisations should ensure they have provided clear instructions to staff on how to safely and securely redact information, such that the redaction cannot subsequently be removed. Consideration should be given to obtaining an accredited third-party redaction tool for Microsoft Word and Excel.
CBN - 20006	Cyber Threats using the COVID-19 Pandemic		Action Required Audit Committees and Boards/Governing Bodies are advised to seek assurance from digital / IT teams that a comprehensive programme of protection measures are in place to protect technology, and to raise user awareness.
CBN – 20023	Need for a Social Media and Electronic Communications Policy		Action Required Not Urgent Audit Committees and Boards are advised to review their policies, including those relating to GDPR, communications, marketing, disciplinary, code of conduct, and to ensure that they are in line with the recommendations contained within the articles. Consideration should also be given to having a separate Social Media and Electronic Communication Policy.

CBN Ref	Subject	Status	TIAA Comments
CBN -20025	Risks Associated with Cloud Computing		Action Required Audit Committees and Boards/Governing Bodies are advised to seek assurance from their Data Protection Officer and IT on the status of where data is stored and what risk mitigation measures have been employed. Where no due diligence has been performed prior to cloud service use, retrospective assurance should be sought.
CBN -20029	Data Protection Guidance for Collecting Customer Information		Urgent Action Required Organisations should ensure they have appropriate policies and procedures in place to meet their obligations for contact tracing and the protection of customer and visitor details.

Summary of recent Fraud Alerts

Ref	Subject	Status	TIAA Comments
0000	False Invoice Fraud – Increased Exposure		No Action Required This alert provides information and advice to staff about fraud and economic crime that may occur during the COVID-19 emergency, and the risks associated with it. If you or your organisation has fallen victim to fraud you should report it to your Local Counter Fraud Specialist or to the NHS CFA on 0800 028 4060
0000	Mandate Fraud – Increased Exposure		Action Required This alert provides information and advice to staff about fraud and economic crime that may occur during the COVID-19 emergency, and the risks associated with it. If you or your organisation has fallen victim to fraud you should report it to your Local Counter Fraud Specialist or to the NHS CFA on 0800 028 406
0000	Payroll Mandate Fraud – Increased Exposure		Action Required This alert provides information and advice to staff about fraud and economic crime that may occur during the COVID-19 emergency, and the risks associated with it. If you or your organisation has fallen victim to fraud you should report it to your Local Counter Fraud Specialist or to the NHS CFA on 0800 028 4060.

Ref	Subject	Status	TIAA Comments
0000	COVID-19 Related Scams		<p>Action Required</p> <p>This alert provides information and advice to staff about fraud and economic crime that may occur during the COVID-19 emergency, and the risks associated with it. If you have been scammed, report it to Action Fraud: www.actionfraud.police.uk or 0300 123 2040. Also, contact your bank if you have lost money. Action Fraud also provide advice on how to shop safely online: https://www.actionfraud.police.uk/shoponlinesafely The NCSC provide advice on how to protect your devices from the latest threats: https://www.ncsc.gov.uk/guidance/securing-your-devices</p>