

Report to:	Risk and Audit Scrutiny Forum
Date of Meeting:	13 June 2018
Report by:	Audit and Compliance Manager (Finance and
	Corporate Resources)

Subject: Internal Audit Annual Assurance Report 2017/2018

1. Purpose of Report

- 1.1 The purpose of the report is to:-
 - report on the progress and performance of Internal Audit and to provide an independent audit opinion on the adequacy and effectiveness of the Council's governance, risk management and internal control systems based on audit work undertaken in 2017/2018

2. Recommendation(s)

- 2.1 The Forum is asked to approve the following recommendation(s):-
 - (1) note that Internal Audit performance is positive
 - (2) note the overall findings from internal audit work and that these will inform the Council's 2017/2018 governance statement
 - (3) note the level of assurance
 - (4) note that a summary of this report will be presented to Executive Committee on 27 June 2018

3. Background

- 3.1 The internal audit service is delivered within South Lanarkshire Council (SLC) within the context of the Public Sector Internal Audit Standards (PSIAS) (revised 1 April 2017), compliance with which is mandatory under Section 95 of the Local Government (Scotland Act) 1973. This sets out a series of standards to ensure a professional, independent and objective internal audit service is delivered that supports good governance within South Lanarkshire Council (SLC).
- 3.2 PSIAS requires that a Quality Assurance and Improvement Programme (QAIP) is developed to provide assurance that internal activity is conducted in accordance with an Internal Audit Charter, that it operates in an efficient and effective manner and that it is perceived to be adding value and improving operations. This programme includes periodic and ongoing internal assessments as well as an external inspection once in each five year period. An external review was undertaken in 2017/2018 and its conclusions supported the assertion in previous Internal Audit annual assurance reports that SLC's internal audit function generally conforms to the Public Sector Internal Audit Standards. A report on the outcome of this inspection was presented to the Forum on 21 March 2018.

- 3.3 Internal Audit has reported throughout the year to the Risk and Audit Scrutiny Forum (RASF). Reports to the Forum have detailed the findings from each finalised assignment in conjunction with information in relation to Internal Audit activity's purpose, authority, responsibility and performance relative to the 2017/2018 Audit Plan.
- 3.4 During the year, Internal Audit has also delivered services to South Lanarkshire Leisure and Culture, Lanarkshire Valuation Joint Board and SEEMIS under the terms of agreed Service Level Statements. A programme of audits has been completed for each of these external clients in 2017/2018. Annual reports will be prepared and presented to the respective Boards.
- 3.5 In addition, an internal audit service was provided to South Lanarkshire Integration Joint Board in 2017/2018 in conjunction with NHS Lanarkshire. A specific programme of audits for the year is nearing conclusion and will be formally reported to the Board in due course.

4. Link to Council's Objectives and Top Risks

- 4.1 As a function, Internal Audit seeks to link in to the Council's Connect Ambition of 'achieve results through leadership, good governance and organisational effectiveness'. Specifically, for Internal Audit, this relates to the provision of assurance that the Council is well governed financially and operationally and has in place effective control and risk management arrangements. In areas where this is not the case, an action plan is developed and delivery tracked to demonstrate improvements are achieved.
- 4.2 In addition to Connect, assignments within the Audit Plan each year are linked to the Council's top risks to ensure that work is focused in areas of greatest risk and, where potentially, an independent review would add greatest value. The 2017/2018 Plan linked to seven of the Council's top ten risks (as identified in January 2017) with three areas not directly covered by the Plan. There were failure to develop a sustainable Council and communities, failure to demonstrate continuous improvement, limited strategic direction and a lack of cohesive change management and failure to manage increasing levels of adverse weather. Of these risks, the sustainability agenda was considered in the delivery of all audits within the Plan and change management covered by the programme of Service reviews underway. The remaining risk in relation to adverse weather was not included in the Plan as an audit is unlikely to add value.
- 4.3 PSIAS requires the Audit Plan to be kept under review as it progresses and this includes a comparison against the Council's top risks as these are reassessed during the year. The Council's top risks, revised in year, include the following three new top risks:
 - potential liability arising from claims of historic abuse
 - failure to work with key partners to achieve outcomes of the Local Outcome Improvement Plan
 - implementation of Self Directed Support
- 4.4 In respect of the latter two risks, work was included in the 2017/2018 Plan. In respect of the first risk, Internal Audit forms part of the internal working group tasked with responding to this agenda.

- 5. Internal Audit Workload 2017/2018
- 5.1 The actual number of audit days delivered in 2017/2018 was 1,318 days which was 15.8% above Plan¹. 97.4% of the Council Plan was delivered by 31 March 2018. The two outstanding audit assignments at this date relate to special investigations².

Table One - Internal Audit workload analysis for 2017/2018

	Total No. Jobs
Planned	76
Deferred until 2018/2019 ³	(3)
Adjusted workload	73
Reports completed to draft	71

- 5.2 Each of these audits was conducted in conformance with PSIAS.
- 5.3 Of 71 assignments noted in the table above, 70% have been concluded and issued as final. In some instances, findings noted below relate to draft reports, although all outstanding draft reports are at a final stage and no material changes are anticipated.

6. Internal Audit Delivery – 2017/2018

- 6.1 In terms of an overview of performance, Internal Audit has improved performance in 2017/2018 in relation to completing a greater percentage of the audit plan (97.4%; target 100%) and completing assignments within allocated days (82%; target 80%). Targets were met in relation to issuing draft reports on time (87%; target 80%) and productivity (86%; target 80%), albeit year-on-year performance has marginally declined.
- 6.2 As resources reduce, an increasing proportion of total time is being spent on external client work as well as responding to adhoc requests and participating in Council-wide scrutiny and review groups. The presence on such groups provides an independent challenge to the work of the Group and ensures that emerging risks are known and addressed, if required. Whilst not directly providing an audit opinion, knowledge of Council systems and processes are reviewed as part of the delivery of this role and does assist in the development of a more value-added role for the Service.
- 6.3 PSIAS requires the Council's internal audit function to demonstrate engagement with clients to ensure the Audit Plan is agreed at the outset of the year and continues to address known and emerging risks. Historically, this had been achieved through client questionnaires and periodic meetings with Heads of Support Services. Moving forward, feedback will be gathered through annual questionnaires to Heads of Service within whose areas where there has been audit activity in the year and through annual meetings with Executive Directors.
- 6.4 The Forum is asked to note Internal Audit performance in the year to 31 March 2018.

² Contract Review and CRM Fuel Theft

¹ This reflects, in part, an auditor remaining in post during part of 2017/2018 awaiting redeployment which has been resolved at the beginning of 2018/2019

³ I342058 CPO Process, I342061 Mobile Working, I350063 Financial Strategy

7. Financial Controls and Findings

- 7.1 The opinion in relation to financial controls has been formed based on two main areas of assurance, namely:-
 - a programme of financial audits included within the 2017/2018 Internal Audit Plan
 - the work of External Audit in relation to the Council's financial statements for the year ended 31 March 2017 (final) and 31 March 2018 (interim)
- 7.2 Interim audit work for 2017/2018 undertaken to date by the Council's External Auditor has been completed and no significant issues have been highlighted in the Interim Management Letter issued by Audit Scotland for the year ended 31 March 2018.
- 7.3 Overall, there is a good level of assurance over financial control across the Council. Many significant financial controls are imbedded within systems and these have been tested throughout the year by a programme of internal and external audit testing.
- 7.4 In terms of specific findings for the most significant financial audit assignments, a joint audit of **Accounts Payable/E-invoicing** controls has provided overall adequate assurance around the controls in operation within these processes. External Audit have also reviewed this testing and noted their intention to place reliance on the operation of these controls for the 2017/18 financial statements. A number of recommendations, however, are likely to be made surrounding general best practice or in the interests of good house-keeping.
- 7.5 In addition, during the year, reports have been developed for Creditors to identify all instances where the gross invoice amount for each supplier is the same and, therefore, that a duplicate payment may have been made. These lists are prioritised to allow investigation time to be directed to higher value errors. The intention is to move, during 2018/2019, to running these reports on a weekly basis in the period between the last keying date and the payment run date to allow any duplicates to be stopped prior to payment.
- 7.6 Audit work on **PEF** concluded that this was at the early stages of development and implementation but that adequate assurance was obtained that governance arrangements were being developed to assess PEF monies contribution to closing the poverty related attainment gap. Many aspects of PEF governance have been established, however, the audit highlighted the need to focus on transparency across all aspects of the process.
- 7.7 Out with these specific assignments, the Continuous Controls Monitoring (CCM) project continued throughout the year and has informed 'intelligent' sampling within both routine audits and specific investigations. CCM work provided detailed analysis of this data which was subsequently used in special investigations and has been used extensively by External Audit.
- 7.8 Financial investigative work in the year was not significant in terms of volume or value and not such to suggest any fundamental issues within routine financial control arrangements.

8. Operational Controls and Findings

- 8.1 The opinion in relation to operational controls has been formed based on two main areas of assurance, namely:
 - a programme of operational audits included within the 2017/2018 Internal Audit Plan
 - the work of external regulators and inspectors
- 8.2 Overall, there is an adequate level of assurance over operational control across the Council. Although operational controls generally exist, on occasion, these lack robust implementation. Controls such as adherence to proper processes and key controls rely on management checks and monitoring and, as operational controls are generally vested in people, this remains an area of higher inherent risk. Adherence to procedures remains key to ensuring a full audit trail is available to support all activity and demonstrate effective governance of Council funds.
- 8.3 In terms of specific findings for the most significant operational audit assignments, adequate assurance was obtained in relation to the processes in place to ensure the effective and compliant delivery of the Council's **City Deal** projects, including the grant claim process. Although processes were assessed as adequate, the audit has concluded that there are a number of areas where improvements could be made across aspects of project monitoring, administration and benefit tracking.
- 8.4 In relation to a review of implementation of the **Community Empowerment Act**, the audit established that the Council has developed a range of measures to ensure compliance with the Act. The audit also recognised that significant progress has been made across a number of areas but that major challenges lie ahead to deliver the outcomes for local communities that the Act seeks to deliver.
- 8.5 Audit work in the year also covered Self Directed Support (SDS) and focused on providing assurance that SDS Regulations were being applied within Social Work Resources' processes. The audit highlighted the importance of consistent progress across Services to further develop processes and to complete the substantial volume of work still to be undertaken. Although adequate assurance was obtained that progress is being made, this needs to be maintained if the 2020 deadline is to be met, in what is now a relatively short time-fame.
- 8.6 Audit work on General Data Protection Regulations drew from a broad range of sources to identify key tasks that were required to be undertaken prior to 25 May 2018. This review established that progress had been made across all areas of required compliance but that there were a number of areas that remained work in progress and were unlikely to be completed prior to the GDPR implementation date.
- 8.7 Aside from work on the General Data Protection Regulations (GDPR), there has been no in year review of information governance arrangements by Internal Audit. Within the Council, these are monitored by the Information Governance Board and are selfassessed by Resources on an annual basis prior to completion of the Director's Statement of Assurance. Actions have been identified but, other than those relating to GDPR, are generally not viewed as significant by the Board.

- 8.8 Audit work on **Cyber Security User Interface** confirmed that, overall, there was adequate assurance that the controls in place to enable users to remotely access the Corporate IT network are effective and robust. General recommendations have been made around raising awareness of policies, training, controlling the use of removable media and monitoring USB connectivity across the network.
- 8.9 Work reviewing **Service-based procurement issues** concluded in 2017/2018. Internal Audit will undertake specific follow-up in 2018/2019 to assess whether the significant risks that were identified within specific Service procurement and operational practices have been addressed.
- 8.10 Other than the specific assignments detailed above, investigative work was of low value and volume in operational areas during 2017/2018. Where appropriate, actions have been agreed or are being discussed with Resources.

9. Management of Fraud Risks

- 9.1 There are four main routes for reporting fraud with the Council, whistle-blowing via letter, telephone call, verbal or email, through the CRM system, through local management or from the Police. Two-thirds of concerns reported during the year came through external whistle-blowing or through the CRM system. The remaining one-third of concerns were reported by local management. Irrespective of the source of alert, all notifications are risk assessed and, dependent on an initial evaluation of risk, either investigated by Internal Audit or the Personnel fact-finding team (with assistance from Resources if required) or, if relevant, passed to the Police. Fraud statistics are reported bi-annually to the Forum and a full report will be presented to the Forum detailing 2017/2018 statistics in September 2018.
- 9.2 The total value of fraud concerns reported to Internal Audit in 2017/2018 equated to £7.3k. The majority of this related to two separate investigations covering a break in and use of Pupil Equity Fund monies. These two investigations represented 84.6% of the value of total fraud concerns in the year. The Council's Security Manager has reviewed and implemented a number of improvements to address issues around the break-in. In respect of PEF monies, no fraud was identified but the review did highlight the importance of transparent decision-making to demonstrate and respond to the intense interest that PEF will generate. Significant reputational risk can, of course, attach to frauds irrespective of the value. Audit recommendations are routinely made to address identified gaps in controls and standard fraud indicators are included in all audit programmes, the results of which are considered during the annual planning process.
- 9.3 In addition to the above investigative work, Internal Audit are responsible for coordinating investigation of National Fraud Initiative matches throughout the Council. 98.5% of all target investigations were completed by 31 March 2018. A report on the interim outcome of the NFI exercise was presented to the Forum in March 2018 and a final report on the exercise will be included in the annual Fraud Statistics report presented to the Forum later in the year. It is anticipated that no fraud will be identified by investigations although errors have been highlighted and a value attached to this.

- 9.4 A corporate fraud programme of work was also included in the 2017/2018 Annual Internal Audit Plan. Two more significant assignments within this programme were in relation to Tenancy Fraud and Abandoned Properties.
- 9.5 Audit findings in relation to **Tenancy Fraud**, established that tenancy records were in need of review and update and that data cleansing was recommended within Academy prior to the move to a replacement system. There were no indicators that a tenancy had been fraudulently succeeded.
- 9.6 In relation to **Abandoned Properties**, testing found that the Service is proactive in engaging with tenants with rent arrears albeit there were some documentation and administrative gaps in the abandonment process. Debt collection in this area remains problematic.
- 9.7 Internal Audit also monitors fraud alerts through internal and external sources and disseminates information as appropriate. In 2017/2018 the majority of the information shared with Council Resources related to fraudulent attempts to change bank details. A specific review of a sophisticated fraud that was perpetrated in another Local Authority is underway with a focus on areas where there is specific risk of the same control gap within this Council. Appropriate action will be taken to address any identified risks to South Lanarkshire Council.

10. Council wide Performance – Delivery of Audit Actions 2017/2018

- 10.1 PSAIS places a responsibility for monitoring progress with the delivery of audit actions with the Chief Internal Auditor to ensure that recommendations are effectively implemented. Council-wide, 97% of internal audit actions were delivered on time (and 99% in total, with some only marginally late). Only one action remains outstanding as at 31 March 2018 and will now be followed up in 2018/2019. Individual Resource performance information in relation to audit actions is reported within IMPROVe.
- 10.2 The above performance data suggests that actions are being fully and timeously implemented. This is checked independently by a programme of formal follow-up reviews which are undertaken by Internal Audit each year. During 2017/2018, five formal follow-up audit assignments were completed. Of these assignments, all evidenced a degree of completion but there is a growing pattern of recommendations either not being implemented or only partially implemented. Where audit actions are particularly significant, more extensive follow up work is now being programmed within audit plans.

11. Areas of External Reliance

11.1 On an annual basis, an assurance mapping process is undertaken in conjunction with the Good Governance Group to identify significant issues that could impact on the overall opinion expressed within this report. The audit opinion also considers significant partnerships. Assurances are sought in relation to governance arrangements annually by the Council during preparation of the Governance Statement. No issues have been identified that require specific note within this annual report. Internal Audit is represented on the Good Governance Group and, through this, contribute to the preparation and development of the Governance Statement.

- 11.2 This includes the shared risk assessment, the output of a process each year that involves the Council and representatives of all scrutiny bodies who engage with the Council. The outcome (a Local Scrutiny Plan) from this, in 2017/2018, identified no specific risk-based scrutiny risks for the Council although some areas of the Council's activity were to be the subject of ongoing monitoring and oversight by the Local Area Network during the year. In 2018/2019, a similar position has been identified and there are no scrutiny risks identified. Outwith this Local Area Network, the main area of external reliance is detailed in the paragraphs below.
- 11.3 External Audit undertook the 2016/2017 financial audit during 2017/2018 and provided an unqualified opinion in relation to the Council's financial statements. Interim audit work in relation to the year ended 31 March 2018 has been completed by External Audit and no significant issues identified in the Interim Management Letter that has subsequently been issued. Internal Audit have liaised with External Audit periodically throughout the year, as required, and have provided specific assistance around the provision of financial year-end data to Audit Scotland.
- 11.4 Audit Scotland also publish reports throughout the year in relation to a variety of areas. Where Resources consider it appropriate, these are reported to Committees covering the key messages and their application to the Council. In 2017/2018, relatively few reports were presented to Committees or Forums. The process for handling Audit Scotland reports may benefit from a refresh to ensure that a more consistent approach is taken, moving forward. Internal Audit will facilitate this review in 2018/2019.

12. Summary of Overall Assurance and Audit Opinion

- 12.1 Adequate arrangements exist within the Council to escalate any concerns the Audit and Compliance Manager may have in relation to the level of risk accepted by management or the Council. Throughout the year, there was no impairment in the scope of audit work or the ability of Internal Audit to express an independent opinion.
- 12.2 The objective of Internal Audit is to evaluate and improve the effectiveness of risk management, control and governance processes. The purpose of this report is to provide an independent audit opinion on the adequacy and effectiveness of the Council's internal controls based on audit work undertaken in 2017/2018 and by doing so to provide assurance around the overall adequacy and effectiveness of South Lanarkshire Council's framework of governance, risk management and control arrangements.
- 12.3 Of the audit assignments completed to draft stage in 2017/2018 that provided an audit opinion, a material number concluded either good or adequate assurance as to the adequacy and effectiveness of controls. Overall, reasonable assurance can be placed on the adequacy and effectiveness of the Council's framework of governance, risk management and control arrangements for the year ending 31 March 2018.
- 12.4 Of the seventy seven audit actions that were due to be implemented in 2017/2018, 44% of these actions relates to specific Service procurement control gaps. Pro-active approaches are being developed through CCM data analysis of key financial systems to assist in highlighting patterns and trends that merit further investigation. This could form an important part of a sound financial control environment in the future. Continuing themes across actions include adherence to current procedures, retention of documentation, segregation of duties, reviewing and monitoring, that all remain key controls that require to be strengthened.

- 12.5 Internal control remains, primarily, a management responsibility to ensure that the Council conducts its business in a manner that has due regard to the principles of good governance. The presence of an internal audit function does not negate the importance of effective internal controls. Internal Audit cannot be expected to give total assurance that control weaknesses or irregularities do not exist. The above financial and operational audit opinions are based upon the audit work undertaken during the year and knowledge of the Council's governance, risk management and control arrangements.
- 12.6 The Forum is asked to note the above findings and approve their inclusion in the Council's annual Governance Statement. A signed Annual Internal Statement of Assurance is included at Appendix One based on the view of the Council's own internal audit function.

13. Employee implications

- 13.1 The Internal Audit service in 2017/2018 was delivered by a team of thirteen. Of the team of thirteen, eleven are partly or fully qualified through either the Chartered Institute of Internal Auditors or one of the Consultative Committee of Accountancy Bodies.
- 13.2 Feedback received in relation to audit assignments is used to highlight areas for training and development. These are progressed on an individual basis as part of the performance development review process. Best practice information is shared and learning points discussed throughout the year.

14. Financial implications

14.1 Audit and Compliance Services, during 2017/2018, spent £578,793 against a budget of £540,893 (to period 14). The overspend relates primarily to a surplus post that was awaiting redeployment in 2017/2018.

15. Future years

- 15.1 Although the Local Scrutiny Plan reports no specific scrutiny risks have been identified for South Lanarkshire Council in 2018/2019, the Council will be subject to a range of nationally driven scrutiny activity during the year. The Council will also undergo a Best Value audit in late 2018/2019 and preparation for this is underway. The 2018/2019 Audit Plan will allocate time to progress some of the areas identified within the Local Scrutiny Plan and further time can be allocated, if required, to assist in reviews.
- 15.2 For Internal Audit, the focus for the year ahead will include:
 - balancing routine assurance work with the increasing requirement to participate and add value to corporate activity
 - continuing to react timeously to audit requirements for significant evolving agendas

16. Other Implications

16.1 Each audit assignment seeks to identify efficiencies and report as a part of the audit opinion where appropriate. In practice, this often translates into identifying audit recommendations that suggest a more efficient way in which to deliver services. Opportunities to identify 'cash' savings are becoming less frequent in an environment of growing financial constraints. From Resources' perspective, much of the 'value added' element of an internal audit service is linked to the function's ability to provide advice and guidance. In addition, there has been a growing focus on the content of action plans to ensure that these effect required improvements. This is particularly important in areas where issues are more significant.

- 16.2 Responding to Services' requests for assistance and participation in internal working groups is accommodated within the Plan and through contingency time. This aligns to the PSIAS requirement to deliver an effective internal audit service. The number of days allocated to contingency has been reduced in 2018/2019 to allow maximum audit coverage. This will remain under review during 2018/2019 and may require some revision, particularly if a significant level of unplanned or adhoc work materialises.
- 16.3 There are no sustainability issues in terms of the information contained in this report.

17. Equality Impact Assessments and Consultation Arrangements

- 17.1 There is no requirement to carry out an impact assessment in terms of the information contained within this report.
- 17.2 Resource Heads of Service are consulted in advance of every planned audit assignment and following completion of fieldwork. Resources and elected members are also consulted during preparation of the annual audit plan.

Yvonne Douglas Audit and Compliance Manager

24 May 2018

Link(s) to Council Values/Ambitions/Objectives

Achieve results through leadership, good governance and organisational effectiveness

Previous References

- 2017/2018 Quarter One Audit Plan (22 February 2017 RASF)
- 2017/2018 Quarters Two Four Audit Plan (RASF 20 September 2017)
- 2016/2017 Internal Audit Annual Assurance Report (RASF 20 September 2017)
- 2018/2019 Internal Audit Plan (RASF 21 March 2018)

List of Background Papers

- 2017/2018 progress reports to the Risk and Audit Scrutiny Forum
- Figtree statistical and assurance and time recording extracts
- Public Sector Internal Audit Standards (revised)
- Fraud statistics and NFI updates

Contact for Further Information

If you would like to inspect the background papers or want further information, please contact:-

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Signed Statement of Assurance for 2017/2018Appendix OneTo the members of South Lanarkshire Council, the Chief Executive and ExecutiveDirectors

As Audit and Compliance Manager of South Lanarkshire Council, I am pleased to present my annual statement and report on the adequacy and effectiveness of the governance, risk management and internal control systems of the Council for the year ended 31 March 2018. **Respective responsibilities of management and internal auditors in relation to** governance, risk management and internal control

It is the responsibility of the Council's senior management to establish appropriate and sound systems of governance, risk management and internal control and to monitor the continuing effectiveness of these systems.

It is the responsibility of the Audit and Compliance Manager to provide an independent opinion on the adequacy and effectiveness of the governance, risk management and internal control systems of the Council. The Audit and Compliance Manager cannot be expected to give total assurance that control weaknesses or irregularities do not exist but can form an opinion based on work undertaken during the year and knowledge of control systems.

The Council's framework of governance, risk management and internal controls

South Lanarkshire Council has a responsibility to ensure its business is conducted in accordance with legislation and proper standards and adheres to and works within a framework of internal values and external principles and standards.

The governance framework comprises the systems and processes, culture and values by which the Council is directed and controlled and how it accounts to communities. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.

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 therefore only provides 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 that would prevent the achievement of South Lanarkshire Council's policies, aims and objectives, to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.

The work of Internal Audit

Internal Audit is an independent and objective assurance function established by the Council to review its governance, risk management and internal control arrangements. It objectively examines, evaluates and reports on the adequacy of these arrangements as a contribution to general governance arrangements and more specifically the proper, economic, efficient and effective use of resources.

The Internal Audit Service operated in accordance with the Public Sector Internal Audit Standards (PSAIS) (revised 2017) throughout 2017/2018. An external assessment of the extent of compliance was undertaken in 2017/2018 as part of the Quality Assurance and Improvement Programme. This assessment concluded that the section generally conforms with the requirements set out in PSIAS with actions agreed to address areas of non-compliance identified by the review. These areas of non-compliance are not considered to impact upon the quality of the internal audit service delivered or the audit opinion expressed within this annual report.

The section undertakes an annual programme of work endorsed by the Risk and Audit Scrutiny Forum and approved by the Executive Committee. All plans are based on a formal risk evaluation process, which reflects agreed and emerging risks and changes within the Council and is subject to periodic review throughout the year.

All internal audit reports identifying risks, areas for improvement and/or non-compliance with expected controls are brought to the attention of management and include appropriate recommendations and agreed action plans. It is management's responsibility to ensure that proper consideration is given to internal audit reports and that appropriate action is taken to implement audit recommendations.

Internal Audit ensure that management has understood agreed actions or assumed the risk of not taking action. A programme of informal and formal follow-up audit assignments provides assurance around the complete and timeous implementation of audit recommendations. Significant matters arising from internal audit work are reported to the Executive Director Finance and Corporate Resources and the Council's Risk and Audit Scrutiny Forum.

Basis of opinion

My evaluation of the control environment relates only to South Lanarkshire Council and is informed by a number of sources but mainly by audit work undertaken during 2017/2018.

Limitation of scope

No individual audit assignments were specifically limited in scope at the outset but scopes were amended to reflect the output from the initial risk and control analysis undertaken at the start of each assignment and the resources available.

Opinion

It is my opinion, based on the above, that overall, reasonable assurance can be placed on the adequacy and effectiveness of the Council's framework of governance, risk management and control arrangements for the year ending 31 March 2018.

Signature:-

Yvonne Douglas BA CA

26 April 2018