

WALSALL COUNCIL

INTERNAL AUDIT PROGRESS REPORT

Audit Committee – 25th September 2017

Status of our reports

This report ("Report") was prepared by Mazars LLP at the request of Walsall Council and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our internal audit work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, Internal Audit have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

The Report was prepared solely for the use and benefit of Walsall Council and to the fullest extent permitted by law Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or rely for any reason whatsoever on the Report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification. Accordingly, any reliance placed on the Report, its contents, conclusions, any extract, reinterpretation, amendment and/or modification by any third party is entirely at their own risk. Please refer to the Statement of Responsibility in Appendix 5 of this report for further information about responsibilities, limitations and confidentiality.

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Introduction

This progress report to the Audit Committee covers the work carried out since the last audit committee by Mazars LLP.

Appendix 1 outlines progress to date against the 2017/18 Internal Audit Plan.

Background

The purpose of the internal audit plan is to identify the work required to achieve a reasonable level of assurance to be provided by Mazars LLP in compliance with the Code of Practice for Internal Audit.

The fundamental role of Internal Audit is to provide senior management and Members with independent assurance on the adequacy, effectiveness and efficiency of the system of internal control, and to report major weaknesses together with recommendations for improvement. This role is fulfilled by carrying out appropriate audit work, normally in accordance with a strategic plan and an annual operational plan, as approved by the Chief Finance Officer and the Audit Committee.

As internal audit is a major source of assurance that the Council is effectively managing the principal risks to the achievement of its corporate objectives, a key rationale for the development of the internal audit plan was the Council's own Corporate and Directorate Risk Registers and how the internal audit plan can provide this assurance.

Progress to Date

Progress against the 2017/18 Internal Audit Plan is shown in Appendix 1.

We have issued the following 2016/17 Final reports since the last meeting of the Audit Committee.

- Housing Benefit & Council Tax Support (Evaluation assurance: Substantial. Testing assurance: Substantial)
- School Improvement Services (Evaluation assurance: Substantial. Testing assurance: Substantial)
- Support Planning, Resource Allocation, Personal Budgets & Direct Payments (Evaluation assurance: **Substantial**. Testing assurance: **Limited**)

We have issued the following 2017/18 Final reports since the last meeting of the Audit Committee.

• Business Continuity Planning (Evaluation assurance: Substantial. Testing assurance: Substantial)

We have issued the following 2017/18 Draft reports since the last meeting of the Audit Committee.

- Declarations of Interest (Evaluation assurance: Substantial. Testing assurance: Substantial)
- Carbon Reduction Commitment Energy Efficiency Scheme 2016/17 (Evaluation assurance: Limited. Testing assurance: Substantial)

Progress to Date Follow-up of Recommendations

2015/16, 2016/17 & 2017/18

The table below highlights the number of recommendations raised in the final audit reports for 2015/16, 2016/17 and 2017/18. It should be noted that progress in implementing recommendations raised is due for follow up as part of the 2017/18 audit plan, and summary of findings to date is shown in the table below:

| Year | Total Recommendations | Implemented and no longer relevant | % | Implemented, no longer relevant or partly implemented | % |
|---------|-----------------------|--|-----|---|-----|
| 2015/16 | 452 | 436 | 97% | 446 | 99% |
| 2016/17 | 406 | 316 | 78% | 336 | 83% |
| 2017/18 | 75 | 53 | 71% | 55 | 73% |

Appendix 4 provides a summary of the status of all 2015/16, 2016/17 and 2017/18 recommendations where the proposed implementation date was at or before 31st August 2017.

Definition of Assurance & Priorities

Audit assessment

In order to provide management with an assessment of the adequacy and effectiveness of their systems of internal control, the following definitions are used:

| Level | Symbol | Adequacy of system design | Effectiveness of operating controls |
|-------------|--------|--|---|
| Good | G | There is a sound system of internal control designed to achieve the system objectives. | The controls are being consistently applied. |
| Substantial | s | Whilst there is a basically sound system of internal control design, there are weaknesses in design which may place some of the system objectives at risk. | There is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk. |
| Limited | L | Weaknesses in the system of internal control design are such as to put the system objectives at risk. | The level of non-compliance puts the system objectives at risk. |
| Nil | N | Control is generally weak leaving the system open to significant error or abuse. | Significant non-compliance with basic controls leaves the system open to error or abuse. |

The assessment gradings provided here 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 'Good' does not imply that there are no risks to the stated control objectives.

Grading of recommendations

In order to assist management in using our reports, we categorise our recommendations according to their level of priority as follows:

| Level | Definition |
|------------|--|
| Priority 1 | Recommendations which are fundamental to the system and upon which the organisation should take immediate action. |
| Priority 2 | Recommendations which, although not fundamental to the system, provide scope for improvements to be made. |
| Priority 3 | Recommendations concerning issues which are considered to be of a minor nature, but which nevertheless need to be addressed. |

Priority 1 Recommendations

No Priority 1 recommendations have been raised in the final reports issued since the last Audit Committee meeting.

Appendix 1 – Status of Audit Work 2017/18

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opiı | nion | Recor | nmenda | ations | Comments |
|------------------------------|----------------------------------|--|-----------|-------------------|-----------------------|------------|------------|---------|-------|--------|--------|----------|
| | | | | Donvorou | Tiolawonk | | Evaluation | Testing | 1 | 2 | 3 | |
| | Main Accounting | Covering adequacy and effectiveness of controls including access control, journals, virements, etc. CRSA to be applied. | 10 | | Q4 | | | | | | | |
| | Treasury Management, Cash & Bank | Covering adequacy and effectiveness of controls over investments, loans, management information, etc. CRSA to be applied. | 10 | | Q4 | | | | | | | |
| | Accounts Receivable | Covering adequacy and effectiveness of controls over the Accounts Receivable system. CRSA to be applied. | 10 | 0.5 | Q3 | ToR Issued | | | | | | |
| Core Financial Systems | Accounts Payable | Covering adequacy and effectiveness of controls over the payment of creditor invoices. CRSA to be applied. | 10 | 0.5 | Q3 | ToR Issued | | | | | | |
| | Budgetary Control | To cover strategic approach to co-ordinating budgetary control, monitoring and reporting, and also testing a sample of departments. | 10 | | Q4 | | | | | | | |
| | Council Tax | Covering adequacy and effectiveness of controls including liabilities, billing, cash collection, recovery and accounting. CRSA to be applied. | 10 | | Q4 | | | | | | | |

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opi | nion | Reco | mmend | ations | Comments |
|----------------------|--|---|-----------|-------------------|-----------------------|------------------------|------------|---------|------|-------|--------|----------|
| | | | | | | | Evaluation | Testing | 1 | 2 | 3 | |
| | NNDR | Covering adequacy and effectiveness of controls including Business Rate Retention Scheme, liabilities, billing, cash collection, recovery and accounting. CRSA to be applied. | 10 | | Q4 | | | | | | | |
| | Housing Benefit & Local Council Tax Support | Covering adequacy and effectiveness of controls including new claims, size criteria, benefit caps, amendments, backdated benefits, payments and reconciliations. CRSA to be applied. | 15 | 0.5 | Q3 | ToR Issued | | | | | | |
| | Payroll and Pensions Administration | Covering adequacy and effectiveness of controls over starters, leavers, amendments, etc. | 10 | 0.5 | Q3 | ToR Issued | | | | | | |
| | Asset Management | Assurance over the design and application of controls relating to areas such as asset management strategy, capital accounting. | 10 | | Q3 | | | | | | | |
| Core Financia | I Systems Total | | 105 | 2 | | - | • | • • | | | | |
| | Change and Governance | | | | | | | | | | | |
| Operational Risks | Declarations of Interest | Covering adequacy and effectiveness of controls over identifying, reporting and updating declarations of interest in accordance with the Council's Code of Conduct. | 15 | 13 | Q2 | Draft Report Issued | | | | | | |
| | Individual Performance Management and Development | Covering adequacy and effectiveness of key controls over professional training and development, including links from the Employee Performance Review and monitoring of | 15 | | Q3 | | | | | | | |

| Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opiı | nion | Reco | mmend | ations | Comment |
|--|--|-----------|-------------------|-----------------------|-------------------------------|------------|---------|----------|----------|----------|--|
| | | | Delivered | FIEIGWOIK | | Evaluation | Testing | 1 | 2 | 3 | |
| | outcomes. To include advice regarding the changes to the existing procedures. | | | | | | | | | | |
| CRC Energy Efficiency Scheme | Annual audit and sign off | 15 | 13 | Q2 | Draft Report Issued | | | | | | Certification work completed |
| Economy & Environment | | • | | | 1 | | | <u> </u> | <u> </u> | <u> </u> | |
| Streamlining Services | To cover controls over delivering the proposals for the long term future of libraries | 15 | | Q4 | | | | | | | |
| Regulation of Investigatory Powers Act 2000 (RIPA) | Covering adequacy and effectiveness of key controls over the use of RIPA. | 5 | 2 | Q2 | Work in Progress | | | | | | |
| Local Growth Fund | Annual audit and sign off | 5 | 5 | Q2 | Sign off work completed | | N/A | • | - | • | |
| Children's Services | | • | | | | | | | | | |
| Troubled Families | Covering adequacy and effectiveness of controls in place over eligibility, payments and achievement of progress measures. | 15 | | Q2 & Q4 | | | | | | | |
| Early Years | Covering controls to ensure arrangements are in place for the increase in 3-4 year old funding from September 2017. | 15 | | Q3 | | | | | | | |
| Local Authority Designated Officer (LADO) | Covering controls to ensure allegations are investigated promptly and fairly, decision making is | 5 | 3 | Q1 | Work in Progress | | | | | | Audit commence and stopp due to Ofs inspection |

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opi | nion | Reco | mmenda | ations | Comments |
|--------------------|------------------------------|---|-----------|-------------------|-----------------------|---------------------|------------|---------|------|--------|--------|--|
| | | | | | | | Evaluation | Testing | 1 | 2 | 3 | |
| | | clearly recorded and comprehensive training is available to staff and partners regarding the role. | | | | | | | | | | Restarted on 24 th August |
| | School Admissions Planning | Covering controls to ensure sufficient school places are available to meet the Borough's needs | 16 | 5 | Q2 | Work in Progress | | | | | | |
| | Adult Social Care | | | | | | | | | | | |
| | Domiciliary Care | To cover controls in place over expenditure and income received, and to ensure legal requirements are met and assets are safeguarded. | 15 | 0.5 | Q4 | ToR issued | | | | | | Audit postponed to Q4 at the request of the Head of Integrated Commissioning and agreed with S151 Officer |
| | Market Management | Review of controls in place over contract management across the directorate, and measures adopted to monitor potential provider failure. | 15 | 0.5 | Q2 | Work in Progress | | | | | | |
| | Safeguarding | A review of the new safeguarding procedures following decentralisation to localities. | 15 | | Q3 | | | | | | | To include a sample of DoLs within testing |
| | Community Based Charging | A review of the revised Community Based Charging policy. | 5 | | Q4 | | | | | | | |
| Operation | al Risks Total | | 171 | 42 | | | | | | | | |
| | Combined Authority | The specific audit and scope will be agreed with management | 15 | | Q4 | | | | | | | |
| Strategic Risks | Programme/Project Management | Programme/Project management assurance in respect of Transformation. A sample of projects in the programme will be selected. | 20 | | Q2 | | | | | | | |

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opi | nion | Recor | mmenda | ations | Comments |
|----------------|---|--|-----------|-------------------|-----------------------|------------------------|-------------|-------------|-------|--------|--------|----------|
| | | | | Delivered | TICIOWOTK | | Evaluation | Testing | 1 | 2 | 3 | |
| | Procurement | Covering adequacy and effectiveness of the Council's corporate approach to procurement. | 20 | | Q3 | | | | | | | |
| | Partnership Arrangements | Review the arrangements in place for the governance, monitoring and reporting of Partnerships activities. A sample of Partnership arrangements will be selected | 20 | | Q2 | | | | | | | |
| | Performance Management | Covering adequacy and effectiveness of the Council's strategic approach to performance management (including management information, target setting, reporting, roles and responsibilities) | 15 | 0.5 | Q3 | ToR Issued | | | | | | |
| | Business Continuity & Emergency Planning | Covering adequacy and effectiveness of the Council's arrangements for Business Continuity | 15 | 15 | Q1 | Final Report Issued | Substantial | Substantial | - | 8 | 4 | |
| | General Data Protection Regulation | Covering controls over the preparations for the adoption of GDPR, including the 12 steps to take now guidance from the ICO | 16 | | Q3 | | | | | | | |
| Strategic Risk | s Total | | 121 | 15.5 | | | | | | | | |

| | Area | Scope | Plan Days | Days Delivered | | Status | Opir | nion | Recor | mmend | ations | Comments |
|---------------|---------------------------------|--|-----------|-------------------|-----------|--------|------------|---------|-------|-------|--------|----------|
| | | | - | Denvered | Fleidwork | | Evaluation | Testing | 1 | 2 | 3 | |
| | Counter Fraud | Internal Audit will work with the Council in the development of a fraud risk register, the provision of fraud awareness training, pro-active fraud exercises and reactive investigations. | 30 | | Q1-Q4 | | | | | | | |
| | Governance and Risk Management | CRR/Assurance Framework updates to CMT and AC, Risk Management Workshops for staff and Members. | 30 | 5 | Q4 | | | | | | | |
| | Continuous Auditing/Data Mining | Data analysis scripts will be written on which both identify anomalies as well as comparing the number of anomalies occurring on a period by period basis. Suggested areas of review are Payroll, Accounts Payable or General Ledger. | 20 | | Q1-Q4 | | | | | | | |
| | Benefit/Savings Realisation | To provide assurance that processes are in place to measure such initiatives. | 20 | | Q3 | | | | | | | |
| | CRSA | The use of CRSA to provide assurance that managers understand their requirements and take ownership of their responsibilities. To be used to update the key questions document in preparation for the Annual Governance testing. | 20 | | Q3-Q4 | | | | | | | |
| Governance, I | Fraud & other Assurance Methods | | 120 | 5 | | | | · | | | | |

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opiı | nion | Recor | nmenda | ations | Comments |
|-----------|---|---|-----------|-------------------|-----------------------|---------------------|------------|---------|-------|--------|--------|----------|
| | | | | | | | Evaluation | Testing | 1 | 2 | 3 | |
| | IT Monitoring and Management Information | A review of monitoring solutions in place for key systems and infrastructure, capability for reporting key IT management information, and management oversight of antivirus tools | 10 | 0.5 | Q3 | ToR issued | | | | | | |
| | Social Medial Policies and Procedures | A review of the adequacy and effectiveness of the controls in place over the use of Social Media | 5 | 0.5 | Q3 | ToR issued | | | | | | |
| іст | IT Strategy | A review of IT Strategy development and management | 5 | 2 | Q2 | Work in Progress | | | | | | |
| | iTrent Payroll Application | A review of the adequacy and effectiveness of controls in place over the Payroll application, including system access, transaction controls, updates and back-up routines. | 6 | 4 | Q2 | Work in Progress | | | | | | |
| | Mosaic Application | A review of the adequacy and effectiveness of controls in place over the Adults and Children's case management system, including system access, transaction controls, updates and back-up routines. | 6 | 0.5 | Q4 | ToR Issued | | | | | | |
| | Website Security | A review of key security controls operating over the Council's website | 6 | 0.5 | Q4 | ToR Issued | | | | | | |
| | Management Advice | | 2 | | | | | | | | | |
| ICT total | | | 40 | 8 | | | | | | | | |
| Other | Follow-up of Recommendations | Follow-up of all priority 1 and 2 recommendations made in final reports issued. | 30 | 7 | Q1-Q4 | | | | | | | |

| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Opinion | | Reco | mmend | ations | Comments |
|--------------|--|---|-----------|-------------------|-----------------------|--------|------------|---------|------|-------|--------|----------|
| | | | | | | | Evaluation | Testing | 1 | 2 | 3 | |
| | Management and Planning | Including attendance at Audit Committee | 80 | 11 | Q1-Q4 | | | | | | | |
| | Advisory | Resources used for advice such as project boards | 20 | | Q1-Q4 | | | | | | | |
| Other total | | | 130 | 18 | | | | | | | | |
| Schools | To provide the Chief Finance Officer with adequate assurance over standards of financial management and the regularity and probity of spend | To provide the Chief Finance Officer with adequate assurance over standards of financial management and the regularity and probity of spend | 120 | 54.25 | Q1-Q3 | | | | | | | |
| Schools Tota | l | | 120 | 54.25 | | | <u> </u> | | | | | |
| Plan Total | | | 807 | 144.75 | | | | | | | | |
| Ad Hoc/Conti | ngency | Contingency allocation to be utilised upon agreement of the Chief Finance Officer. | 70 | | | | | | | | | |
| TOTAL | | | 877 | 144.75 | | | | | | | | |

| | | | | | | | (| Dpinion | Reco | mmenda | ations | |
|---------|-----------------------------|-------|-----------|-------------------|-----------------------|---------------------------|-------------|-------------|------|--------|--------|----------|
| | Area | Scope | Plan Days | Days Delivered | Start of Fieldwork | Status | Evaluation | Testing | 1 | 2 | 3 | Comments |
| | Beacon Primary School | | 5 | 5 | Q1 | Final report issued | Substantial | Substantial | - | 2 | 6 | |
| | Leighswood Primary School | | 5 | 4 | Q2 | Draft Report Issued | | | | | | |
| | New Invention Junior School | | 5 | 5 | Q1 | Final Report Issued | Substantial | Substantial | - | 3 | 3 | |
| | St Michaels Primart School | | 5 | 5 | Q1 | Final Report Issued | Substantial | Limited | - | 10 | 8 | |
| | Millfields Nursery School | | 5 | 5 | Q1 | Final report issued | Substantial | Limited | - | 7 | 7 | |
| | Ogley Hay Nursery School | | 5 | 4 | Q1 | Draft Report Issued | | | | | | |
| | Sandbank Nursery School | | 5 | 5 | Q1 | Final report issued | Substantial | Substantial | - | 6 | 5 | |
| Schools | Valley Nursery School | | 5 | 4 | Q2 | Draft Report Issued | | | | | | |
| Schools | Oakwood School | | 5 | 5 | Q1 | Final Report Issued | Substantial | Substantial | - | 2 | 4 | |
| | Chuckery Primary | | 5 | 4 | Q2 | Draft Report Issued | | | | | | |
| | Old Church Primary School | | 5 | 0.25 | Q2 | Fieldwork Complete | | | | | | |
| | Alumwell Nursery School | | 5 | 0.25 | Q2 | Fieldwork Complete | | | | | | |
| | Fullbrook NurserySchool | | 5 | 0.25 | Q2 | Fieldwork Complete | | | | | | |
| | Mary Elliot School | | 5 | 4 | Q2 | Draft Report Issued | | | | | | |
| | Old Hall School | | 5 | 0.25 | Q2 | ToR Issued | | | | | | |
| | Hilary Primary School | | 5 | 0.25 | Q3 | ToR Issued | | | | | | |
| | Lindens Primary School | | 5 | 0.25 | Q3 | ToR Issued | | | | | | |

| | | | | | | | Opinion | | Recommendations | | | |
|-------------|--|-------|--|-------|------------|---------------|---------|---|-----------------|----------|--|--|
| | Area | Scope | Plan Days Days Start of Delivered Fieldwork Status | | Evaluation | Testing | 1 | 2 | 3 | Comments | | |
| | Pheasey Park Farm Primary School | | 5 | 0 | Q4 | | | | | | | |
| | Pinfold Street Primary School | | 5 | 0.25 | Q3 | ToR Issued | | | | | | |
| | Brownhills Community Technology College | | 5 | 0.25 | Q3 | ToR Issued | | | | | | |
| | St Thomas More Business & Enterprise College | | 5 | 0.25 | Q3 | ToR Issued | | | | | | |
| | Admin Time inc SFVS | | 15 | 2 | | | | | | | | |
| Schools tot | Schools total | | 120 | 54.25 | | | | | | | | |

Appendix 2 – Summary of Final Reports

Brief outlines of the work carried out, a summary of our key findings raised and the assurance opinions given in respect of the final reports issued since the last meeting of the Audit Committee are provided in this section.

Housing Benefit & Council Tax Support

Our audit considered the following areas of activity:

- Policies, Procedures and Legislation
- Administration and Assessment of New Claims
- Local Housing Allowance
- Reviews
- Backdated Benefits/Discretionary Payments
- Payments and Reconciliations
- Cancellations, Overpayments and Recovery Action
- Fraud Management

Our assessment in terms of the design of, and compliance with, the system of internal control covered is set out below:

| Evaluation Assessment | Testing Assessment |
|-----------------------|--------------------|
| Substantial | Substantial |

We have raised four priority 2 and two priority 3 recommendations where we believe there is scope for improvement within the control environment. These are detailed in Section 04 of this report. Our main findings were:

- Supporting information for supported / exempt accommodation housing benefit claims has not always been obtained in accordance with Housing Benefit Regulations.
- Fraud awareness training has not been undertaken since the transfer of the fraud function to SFIS (DWP) in June 2015. The service is not utilising the opportunity to regularly publicise Walsall Markets and generate new customer and trader interest.
- Officer declaration of interest forms have not yet been completed or updated for some members of staff.

School Improvement Service

Our audit considered the following areas of activity:

- Budget Monitoring
- Income Traded Services
- Pupil Premium Grant
- Declarations of Interest

Our assessment in terms of the design of, and compliance with, the system of internal control covered is set out below:

| Evaluation Assessment | Testing Assessment |
|-----------------------|--------------------|
| Substantial | Substantial |

We have raised one priority 2 recommendation where we believe there is scope for improvement within the control environment. This is detailed in Section 04 of this report. Our main finding was:

• Declarations of Interest are not being sent to HR or the Monitoring Officer in accordance with the Council's Code of Conduct.

Business Continuity Planning

Our audit considered the following areas of activity:

- Strategy, Policies and Procedures
- Business Continuity Plan (BCP)
- Roles and Responsibilities
- Staff Training and Awareness
- Rehearsing the Plan
- Management Information

Our assessment in terms of the design of, and compliance with, the system of internal control covered is set out below:

| Evaluation Assessment | Testing Assessment |
|-----------------------|--------------------|
| Substantial | Substantial |

We have raised eight priority 2 and four priority 3 recommendations where we believe there is scope for improvement within the control environment. These are detailed in Section 04 of this report. Our main findings were:

- The BCM Strategy could be improved by including additional key information and approval by the Corporate Management Team.
- There is a lack of formalised governance arrangements in place for Business Continuity oversight.
- The BCP template does not include all sections on communication, information governance and data security.
- There is no schedule of rehearsal/testing of BCPs, particularly for critical systems/functions.
- Post incident report improvements are not followed up and lessons learned are not collated and shared with all BCP authors

Support Planning, Resource Allocation, Personal Budgets & Direct Payment

Our audit considered the following areas of activity:

- Policies, Procedures & Legislation
- Support Planning & Resource Allocation
- Personal Budgets
- Direct Payments

Our assessment in terms of the design of, and compliance with, the system of internal control covered is set out below:

| Evaluation Assessment | Testing Assessment |
|-----------------------|--------------------|
| Substantial | Limited |

We have raised eight priority 2 and four priority 3 recommendations where we believe there is scope for improvement within the control environment. These are detailed in Section 04 of this report. Our main findings were:

• In one of 13 cases a care and support assessment had not been completed promptly.

- Reablement service users have been identified as being in receipt of the service for significantly longer than the recommended 6 weeks.
- In all 15 cases examined signed support plans had not been placed on Mosaic.
- In three of 13 cases examined service user reviews had not been completed.
- Limited documentation / case notes are held on Mosaic for mental health cases.
- In two of 15 cases examined financial assessments had not been completed.
- Evidence of direct payment service reviews is not recorded in Mosaic.
- In one out of 8 cases examined direct payment support & admin fees had been paid for a service user whose direct payment had ended in November 2015.

Appendix 3 – Summary of Unplanned/Irregularity Reports

No unplanned or irregularity reports have been issued since the last meeting of the Audit Committee.

Appendix 4 - Follow-up of Recommendations 2015/16, 2016/17 and 2017/18

Follow-up audits have been undertaken in accordance with the 2017/18 audit plan. The objective was to confirm the extent to which the recommendations made in 2015/16, 2016/17 and 2017/18 internal audit final reports have been implemented.

Outstanding and Partly Implemented High Priority Recommendations from 2015/16, 2016/17 and 2017/18

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|-------------------------------------|-----------|----------------------------|--|--|---|
| Jane Lane School April 2016 | Limited | Inventory Security Marking | All portable assets will be security marked to deter theft and to help identify equipment if stolen and found.An annual check of the inventory will be undertaken and evidenced by the signature(s) of the members of staff involved and the date completed. | Headteacher October 2016 Re-revised September 2017 | Partially implemented Electronic system purchased and majority of equipment entered and security marked - revised implementation date October 2017 |
| Residential Charging May 2016 | Limited | Procurement | It should be ensured that the issue of having to manually calculate budget monitoring reports is addressed as part of the implementation of Mosaic Financials. | Mosaic Implementation Team 30 th Sept 2016 Revised November 2017 | Partially implemented This requirement will be implemented as part of Phase 3 Finance implementation. Once all the services have been migrated from current source systems into Mosaic and the system is live budget monitoring will become an automated process and relevant reports will be developed to support the department. Revised November 2017 |
| | | | Contracts will be awarded following cabinet approval regarding fee rates. | Lead Commissioning Officer 1 st July 2016 Revised 31/10/16 Rerevised April 2018 | Not implemented Advised that transitional contracts in place, but nothing awarded as waiting on procurement and legal. Revised deadline April 2018 |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|------------------------------------|---------------------------|---------------------------------------|---|---|---|
| Shared Lives May 2016 | Borderline Significant | Payments to Carers | It will be ensured that: Evidence that the funding has been approved is held on Mosaic. Support plans are held on Mosaic. Officers will liaise with brokerage regarding differences in payments being made for day care and overnight stays to ensure that they are in accordance with the Social Care Community Based Contributions Policy. | Group Manager - Learning Disability Dec 2016 Revised October 2017 | Partially Implemented Benchmarking with other schemes re payments. Advice sought from Shared Lives Plus. Walsall Council Charging policy is due to go cabinet and following this, there will be a "deep dive" by the lead intregated team commissioner. Revised deadline October 2017 |
| Solihull Framework June 2016 | Limited | Independent Review of the Contract | An independent review of the contract is being undertaken, reviewing the works and actions of both the partners and Walsall Council. | Head of Facilities Management Revised date March 2018 | Work in Progress Following a review of schemes and issues and detailed discussions with portfolio holder for Change and Governance it has been concluded that the Solihull Framework will not be extended (unless an exception circumstance were to occur) when it expires on 31 March 2018. As a result detailed work has included, but not limited to, prioritizing the identification of other procurement options to the Solihull Framework to secure better VFM for the Council both during 2017/18 and from 2018/19 onwards. Revised date March 2018 |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------|-----------|--|---|--|---|
| | | Performance Management | Secret customers have been used to checked the use of the scripts, this has identified some members of the helpdesk staff are not using scripts. Solihull have been informed and they are investigating and if required retraining their staff to suit the council's requirements. | Head of Facilities Management Revised date March 2018 | Completed including revised scripts and priorities. A system of random and regular checking that the scripts are being used by the helpdesk staff will be undertaken to ensure all relevant information is obtained. The Manager Integrated Facilities Management is seeking assurance that this has been undertaken and that it continues throughout the course of the contract. Revised date March 2018 |
| | | Capital Programme / Maintenance Plans | Following a meeting, a new staff member from Solihull has taken ownership of the service and compliance. A new Walsall compliance officer is working with Solihull to ensure full compliance and certification for Walsall properties. Monthly meetings are taking place as of May 2016 to monitor progress. | Head of Facilities Management Revised September 2017 | The Manager Integrated Facilitied Management has instructed the issuing of formal default notices against Solihull for failure to deliver in line with KPI's on a range of medium / large school capital works. Other KPIs to be reviewed in September 2017, again in priority order. Revised date September 2017 |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------|-----------|----------------------|---|--------------------------------|--|
| Social Media | Limited | Policy and Standards | A Social Media Policy will be created for | Corporate | Work in Progress |
| | | | Walsall Council, covering all staff | Assurance Manager | A Social Media Protocol Guidance |
| June 2016 | | | (including third-parties and contractors), | / Media & Comms | document has been drafted and the |
| | | | detailing how the Council will manage a | Officer | Council's Email and Internet Usage |
| | | | corporate presence across social media | | procedure is being reviewed to include |
| | | | channels. Specifically, the policy will | Revised September | information relating to use of social |
| | | | provide an appropriate level of awareness, | 2017 | media and linking to the new policy. |
| | | | knowledge and skill to minimise the | | |
| | | | aforementioned risks and include the | | Revised implementation date |
| | | | following: | | September 2017 |
| | | | 1. The objectives for using social media for | | |
| | | | Walsall Council purposes. | | |
| | | | Potential risks and problems. | | |
| | | | 3. Management of social media channels. | | |
| | | | 4. Usage by council departments. | | |
| | | | 5. Evaluation and metrics. | | |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------------------|-----------|--|---|--|---|
| Risk Management March 2016 | Limited | Risks are identified within project plans for new systems and infrastructure, in change requests for existing systems and infrastructure. Anyone within ICT can submit a risk to be considered to be included in the risk register. However, at present there are no guidelines on risk identification or how a risk should be articulated. | As well as the present tactical approach to risk identification, a strategic approach will be taken to identify all the risks that potential could impact on the ability to deliver ICT's objectives and how ICT supports the delivery of the Council's objectives is not considered. Some techniques which can be used include facilitated risk workshops and the use of risk scenarios. | Carol Williams, Head of Information, Communications and Technologies Re-revised September 2017 | Partially Implemented Further discussions have taken place on aligning ICT risk with corporate risk. Monthly risk meetings to be arranged to discuss risk separately rather than incorporate it into Management Team meetings. Documentation to be formalised (based on the corporate strategy). Corporate risk 6 has already been broken down into a number of issues which ICT are in the process of addressing; the primary one being the data centre strategy project. Revised implementation date September 2017 |
| | | The risks that may impact ICT's ability to deliver its objectives and supporting the delivery of the Council's objectives are not at present effectively addressed. Recognised risk identification techniques, such as the use of risk workshops and risk scenarios, are not presently used. Risk aggregation is not considered i.e. if two or more identified risks should materialise together. | Furthermore, the full risk management ident process will be documented (see 3.1 above) and training provided. Once the risk identification process has been bedded-in, then the process will be further improved by considering risk aggregation. This is the process of considering the impact of two or more risks materialising together e.g. two separate risks may have been identified and both assessed as low risk, but if they should materialise at the same time, the combined risk may be assessed as medium or even high. | | |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------|----------------------|--|--|--|---------------------------------|
| | Limited / Limited | Remedial action to address the issues identified in the 2012 appointeeship and deputyship audit report should be completed as soon as possible. The appointeeship project group should ensure that all relevant work is completed and regular progress feedback is provided to Adult Social Care executive management and Legal Services. All applications for deputyships should be processed promptly to ensure the ongoing safeguarding of these vulnerable service users. | In order for the decision making process for clients to request their appointeeship to be transferred back to Walsall to be reviewed by the DWP a sample of 4 cases was issued to them on 31 March 2017 in order to provide assurance that due process has been followed by the council. An update regarding this will be provided to Internal Audit. Financial Admin will ensure that Deputyship will be considered as an alternative to appointeeship in relevant cases. | Strategic Lead Officer – Project Officer Executive Director – Adult Social Care Head of Community Care September 2017 Financial Admin Officer | Not yet due for implementation. |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------|-----------------|---|---|--------------------------------|---------------------------------|
| | No / Limited | Provisions for providing a 24-hour call out service require review to ensure that sufficiently trained staff are available to deal with emergency/urgent reports to ensure service users are not left at risk. | The CAS call operator and Response officers are available 24/7; to date the fitting service has never had the resource or budget to support 24/7 fitting and maintenance. To date there has never been sufficient evidence to suggest a dedicated out of hours maintenance team is required. In addition, there are councils that do not operate response services for either maintenance equipment or actual support. Benchmarking with these local authorities will be undertaken as part of the review of service delivery options. All equipment that "fails" can be replaced with an alternative where the kit is peripheral, (i.e. is linked to a base unit), and where Response Officers are suitably trained. They are able to fit out of hours on an emergency basis only however, their priority action is responsive care provision. Action: An additional temporary installation officer has been recruited which has reduced installation times down to 48 hours for urgent and 5 days for routine installations as of 19.05.2017. Action: The Group Manager will make initial contact with Integrated Facilities Management to undertake the scoping of a fitting and maintenance programme, based on an affordable, internal facilities management model or by an alternative delivery model. | | Not yet due for implementation. |

| Audit/Report Assurar Date | ce Recommendations | Management Response | Responsibility and Due Date | Update Position |
|------------------------------|---|--|---|---------------------------------|
| | Capacity and contingency arrangements for installations require review to ensure that, in the event of urgent referrals for telecare, there is sufficiently experienced staff resources available to meet the needs of the 24- hour service provision. | Current fitting time is now within the 2-day period for emergencies (as of 19.05.2017). With reference to the cases cited opposite: they fall within the "Winter Pressures" period where demand for fitting doubles due to the need to exacerbate discharges. All staffing capacity goes out to fit if necessary: including senior staff. The service will only know at the point of discharge once they have the referral from the referring practitioner, not before. If the referral is completed at the point the section 2 notice is issued from the hospital, then time frames will be met. If the referral is not done until the section 5 notice then response will be slower. It is important to add that pendants do not prevent falls. Falls prevention is based on exercise and rehabilitation programmes, which are not delivered by this service. Action: A set of 10 KPIs will be introduced to cover off and monitor timescales similar to those outlined in the TSA accreditation offer. | Team Manager – Response Service Immediate resources have gone in. Group Manager – Learning Disabilities Commissioning Manager Group Manager – Performance Long Term Plan for Assistive Technology to be presented to EDMT in the summer. | Not yet due for implementation. |

| Audit/Report Date | Assurance | Recommendations | Management Response | Responsibility and Due Date | Update Position |
|----------------------|-----------|---|---|--|--------------------------------|
| | | Senior management should ensure that staff resources are sufficient to allow for statutory breaks to be taken in accordance with the requirements set out in the Working Time Regulations. | The implementation of the new rota proposal is imminent and this will provide adequate capacity to cover breaks and meet the Working Time Directive. A review of service responsibility (corporate call handling / hardwired schemes) will be undertaken as part of the Channel Shift project. This will provide opportunity for cross service working / shared resource planning in the medium term. The service acts as the councils out of hours contact centre with ASC carrying the significant risk of all call traffic between 5pm until 9am the next day (for the whole of the council) and all weekend. This puts additional pressure on the call handlers. Action: Whilst the department looks at alternative delivery models for the service as a whole, a third member of staff will be introduced across the shift to support colleagues. This will enable seniors to be able to concentrate on performance, quality, and managing. This third person will help with emergency fitting too, when required and system cleansing. | Team Manager – Response Service Temporary staffing resources to be in place by the end of July 2017 | Awaiting response to follow up |

The table below provides a summary of the status of 2015/16 recommendations that have not been reported as implemented at previous Audit Committee meetings.

| Audit/Report Date | Assurance Level | Raised | Implemented | | Partly lemer | | Out | stanc | ling | No longer | Original Due | Revised Due Date | Not yet due |
|--|---------------------------|--------|-------------|---|-----------------|---|-----|-------|------|--------------|-----------------|---------------------|-------------|
| | | | | 1 | 2 | 3 | 1 | 2 | 3 | relevant | Date | | |
| Solihull Framework June 2016 | Limited | 11 | 8 | | | | 3 | | | | Oct 2016 | Mar 2018 | |
| Jane Lane School April 2016 | Limited | 31 | 29 | 1 | | | | | | 1 | Oct 2016 | Oct 2017 | |
| ICT Risk Management June 2016 | Limited | 6 | 4 | | | | 1 | 1 | | | Dec 2016 | Sep 2017 | |
| Residential Charging May 2016 | Limited | 30 | 21 | 1 | | | 1 | | | 7 | July 2016 | Apr 2018 | |
| Social Media June 2016 | Limited | 11 | 9 | 1 | 1 | | | | | | Mar 2017 | Sep 2017 | |
| Shared Lives May 2016 | Borderline Signifcant | 10 | 8 | 1 | 1 | | | | | | Jun 2016 | Nov 2017 | |
| Cloud Computing June 2016 | Borderline Significant | 4 | | | 3 | | | | | 1 | Jun 2017 | Oct 2017 | |
| Bank Account Reconciliations November 2015 | Significant | 11 | 10 | | 1 | | | | | | Jan 2016 | Oct 2017 | |
| | | 114 | 89 | 4 | 6 | | 5 | 1 | | 9 | | | |

Fully implemented 2015/16 audit reports

| Title | Assurance Level | Raised | Implemented | No Longer Relevant |
|--|---------------------|--------|-------------|-----------------------|
| Capital Accounting | Significant | 5 | 5 | |
| Capital Programming | Significant | 2 | 2 | |
| Cash and Bank | Significant | 2 | 2 | |
| Nominal Ledger | Significant | 1 | 1 | |
| Treasury Management | Significant | 2 | 2 | |
| Troubled Families Grant January 2016 Claim | Significant | 1 | 1 | |
| Community Capacity Grant | Significant | 1 | 1 | |
| Autism Innovation Capital Grant | Significant | 1 | 1 | |
| Personal Budgets inc Direct Payments | Limited Progress | 16 | 16 | |
| Looked After Children Follow Up | Significant | 5 | 5 | |
| Schools Property Maintenance Follow Up | Significant | 3 | 3 | |
| Asset Management Follow Up | Limited Progress | 6 | 6 | |
| Growth Deal | Significant | 4 | 4 | |
| Corporate Risk 3b | Significant | 3 | 3 | |
| Payroll Follow Up | Significant | 8 | 8 | |
| Corporate Risk 3a | Significant | 6 | 6 | |
| Accounts Payable Follow Up | Significant | 12 | 12 | |
| Corporate Risk 9 | Significant | 5 | 5 | |
| Leamore Primary School | Significant | 12 | 12 | |
| Phoenix School | Significant | 19 | 19 | |

| Title | Assurance Level | Raised | Implemented | No Longer Relevant |
|--|---------------------------|--------|-------------|-----------------------|
| Sunshine Infants & Nursery School | Significant | 7 | 7 | |
| Greenfield Primary School Follow Up | Significant Progress | 1 | 1 | |
| Carbon Reduction Commitment Efficiency Scheme (CRC) | Significant | 11 | 7 | 4 |
| St Thomas of Canterbury Catholic Primary School | Borderline Significant | 22 | 21 | 1 |
| Software Licensing | Significant | 7 | 7 | |
| Council Tax / NNDR Follow Up | Significant | 10 | 10 | |
| Housing Benefit & Council Tax Reduction Follow Up | Significant | 6 | 6 | |
| Accommodation Services Follow Up | Significant | 5 | 5 | |
| Accounts Receivable Follow Up | Significant | 10 | 10 | |
| Christchurch Primary School | Limited | 36 | 36 | |
| Blakenall Heath Junior | Significant | 13 | 13 | |
| Mental Health Follow Up | Limited Progress | 16 | 16 | |
| Stroud Avenue Family Centre Follow Up | Significant Progress | 1 | 1 | |
| Adult Safeguarding | Borderline Significant | 24 | 22 | 2 |
| Green Spaces | Significant | 9 | 8 | 1 |
| Customer Engagement, Consultation & Complaint Management | Borderline Significant | 30 | 19 | 11 |
| Bereavement & Registration | Significant | 14 | 13 | 1 |
| Better Care Fund | Significant | 2 | 1 | 1 |
| | | 338 | 317 | 21 |

The tables below provide a summary of the status of all 2016/17 recommendations where the proposed implementation date was at or before 31st August 2017 and have not been reported as implemented at the previous Audit Committee meeting.

| Audit/Report Date | Assurance Level | Raised | Implemented | | Partly leme | | Out | tstanc | ding | No longer | Original Due | Revised Due Date | Not yet due |
|--|-----------------------------|--------|-------------|---|----------------|---|-----|--------|------|--------------|-----------------|---------------------|-------------|
| | | | | 1 | 2 | 3 | 1 | 2 | 3 | relevant | Date | | |
| Little Bloxwich Primary School | Substantial / Limited | 16 | 14 | | | | | | | | Sept 2017 | | 2 |
| January 2017 Homelessness | | | | | | | | | | | | | |
| March 2017 | Substantial/ Substantial | 5 | 4 | | | | | | | | Dec 2017 | | 1 |
| Town & District Centres Markets | Limited / Limited | 12 | 6 | | 3 | | | 2 | | 1 | July 2017 | Dec 2017 | |
| March 2017 Facilities Management January 2017 | Limited / Limited | 15 | 9 | | | | | 3 | | | June 2017 | Dec 2017 | 3 |
| Pheasey Park Farm Children's Centre January 2017 | Substantial / Limited | 15 | | | | | | | | | Jun 2017 | Dec 2017 | 15 |
| Appointeeships & Deputyships April 2017 | Limited / Limited | 18 | 11 | 1 | 3 | | | 2 | | | Dec 2017 | | 1 |
| Adoption & Fostering March 2017 | Good / Substantial | 4 | 3 | | | | | | | | April 2018 | | 1 |
| Council Tax / NNDR May 2017 | Substantial/ Substantial | 7 | 5 | | 1 | | | 1 | | | Aug 2017 | Nov 2017 | |
| Human Resources May 2017 | Substantial/ Substantial | 10 | 5 | | | | | | | | June 2018 | | 5 |

| Audit/Report Date | Assurance Level | Raised | Implemented | | Partly lemer | | Out | stand | ling | No longer | Original Due | Revised Due Date | Not yet due |
|---|-----------------------------|--------|-------------|---|-----------------|---|-----|-------|------|--------------|--------------------------------|---------------------|-------------|
| · | | | | 1 | 2 | 3 | 1 | 2 | 3 | relevant | Date | | |
| Community Alarms & telecare Services June 2017 | No / Limited | 20 | 4 | 1 | | | | | | | Aug 2017 (temp measures) | | 15 |
| Salisbury Primary School June 2017 | n/a | 20 | 6 | 1 | 6 | | | | | | Dec 2017 | | 7 |
| Cyber Security February 2017 | Limited / Limited | 8 | 2 | | 1 | | | | | | Feb 2018 | | 5 |
| Housing Benefit & Council Tax Support August 2017 | Substantial/ Substantial | 6 | 2 | | | | | | | | Sep 2017 | | 4 |
| Support Planning, Resource Allocation, Personal Budgets & Direct Payments September 2017 | Significant / Limited | 12 | 7 | | 3 | | | | | | Mar 2018 | | 2 |
| | | 168 | 78 | 3 | 17 | | | 8 | | 1 | | | 61 |

Fully implemented 2016/17 audit reports

| | • | | | |
|---|------------------------------|--------|-------------|-----------------------|
| Title | Assurance Level | Raised | Implemented | No Longer Relevant |
| Delves Infant & Nursery School | Good / Substantial | 6 | 6 | |
| Elmwood School | Good / Substantial | 4 | 4 | |
| St Francis Catholic Primary School | Good / Substantial | 1 | 1 | |
| Rowley View Nursery | Substantial / Good | 4 | 4 | |
| Pool Hayes Primary School | Substantial / Substantial | 16 | 16 | |
| St Anne's Catholic Primary School | Substantial / Substantial | 14 | 14 | |
| County Bridge Primary School | Substantial / Substantial | 14 | 14 | |
| St Joseph's Catholic Primary School | Substantial / Substantial | 4 | 4 | |
| Whitehall Nursery & Infant School | Substantial / Substantial | 15 | 15 | |
| St Peter's Catholic Primary School | Substantial / Substantial | 11 | 11 | |
| Blue Coat Federation | Substantial / Substantial | 10 | 10 | |
| Brownhills West Primary School | Substantial / Substantial | 11 | 11 | |
| Castlefort Primary School | Substantial / Substantial | 8 | 8 | |
| Whetstone Primary School | Substantial / Substantial | 15 | 15 | |
| St Bernadettes Catholic Primary School | Substantial / Substantial | 19 | 19 | |
| St Marys of the Angels Catholic Primary School | Substantial / Substantial | 10 | 10 | |
| Abbey Primary School | Limited / Substantial | 16 | 16 | |
| Shorth Heath Federation | Substantial / Substantial | 17 | 17 | |
| St Francis of Assisi | Good / Substantial | 10 | 10 | |
| Code of Conduct for Operational PFI/PPP Contracts | Good / Substantial | 1 | 1 | |
| Accounts Payable | Good / Substantial | 2 | 2 | |
| Main Accounting | Good / Good | 1 | 1 | |
| Troubled Families Grant | Limited / Substantial | 5 | 5 | |
| CRC Energy Efficiency Scheme | Substantial / Limited | 10 | 10 | |

| Title | Assurance Level | Raised | Implemented | No Longer Relevant |
|--------------------------------------|------------------------------|--------|-------------|-----------------------|
| Accounts Receivable | Substantial / Substantial | 2 | 2 | |
| Treasury Management | Substantial / Substantial | 3 | 3 | |
| Payroll & Pensions Administration | Substantial / Substantial | 6 | 6 | |
| Budgetary Control | Substantial / Substantial | 2 | 2 | |
| School Improvement Services | Substantial / Substantial | 1 | | 1 |
| | | 238 | 237 | 1 |

The tables below provide a summary of the status of all 2017/18 recommendations where the proposed implementation date was at or before 31st August 2017 and have not been reported as implemented at the previous Audit Committee meeting.

| Audit/Report Date | Assurance Level | Raised | Implemented | Partly Implemented | | | Out | stanc | ling | No longer | Original Due | Revised Due Date | Not yet due |
|--|------------------------------|--------|-------------|-----------------------|---|---|-----|-------|------|--------------|-----------------|---------------------|-------------|
| | | | · | 1 | 2 | 3 | 1 | 2 | 3 | relevant | Date | | |
| New Invention Junior School July 2017 | Substantial / Substantial | 6 | 5 | | 1 | | | | | | Sept 2017 | | |
| St Michael's Primary School | Substantial / Limited | 18 | 8 | | | | | | | | Sept 2018 | | 10 |
| July 2017 Millfields Nursery June 2017 | Substantial / Limited | 14 | 10 | | 1 | | | | | | Oct 2017 | | 3 |
| Business Continuity August 2017 | Substantial / Substantial | 12 | 5 | | | | | | | | Apr 2018 | | 7 |
| Substantial / Substantial | | 50 | 28 | | 2 | | | | | | | | 20 |

Fully implemented 2017/18 audit reports

| Title | Assurance Level | Raised | Implemented | No Longer Relevant |
|----------------------------|------------------------------|--------|-------------|-----------------------|
| Beacon Primary School | Substantial / Substantial | 8 | 8 | |
| Oakwood School | Substantial / Substantial | 6 | 6 | |
| Sandbank Nursery School | Substantial / Substantial | 11 | 11 | |
| | | 25 | 25 | |

Appendix 5 - Statement of Responsibility

We take responsibility to Walsall Council for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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