Oxford City Council Internal Audit Report 2010/11

Treasury Management

Final Report
March 2011

Distribution list	Distribution list						
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For information	Nigel Kennedy	Interim Head of Finance					
	Jackie Yates	Corporate Director for Finance and Efficiency					
	Peter Sloman	Chief Executive					

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This report has been prepared solely for Oxford City Council. In accordance with the terms and conditions set out in our engagement letter. We do not accept or assume any liability or duty of care for any other purpose or to any other party. This report should not be disclosed to any third party, quoted or referred to without our prior written consent.

1. Executive Summary

Overall Opinion

Overall opinion

Limited Assurance has been given over the adequacy and operating effectiveness of controls in place over Treasury Management. Our assurance ratings are defined in Appendix 1. Our opinion is based on the work performed as set out in the agreed terms of reference (Appendix 3) and is subject to the inherent limitations set out in Appendix 2.

Scope and limitations of review

We conducted a review of Treasury Management in accordance with the International Standard for Assurance Engagements 3000 "ISAE 3000". The key objectives of the review, the scope and the limitations of scope were agreed with management in advance and set out in the terms of reference (Appendix 3).

Direction of travel

We have noted **no improvement** in the performance of Treasury Management processes since the prior year. Efforts should be made to review all overdue issues and put procedures in place to implement recommendations.

Summary of Key Findings

The number of key findings resulting from audit work undertaken is as follows:

Contro	Design	Operating Effectiveness		
Critical	0	Critical	0	
High	0	High	0	
Medium	4	Medium	6	
Low	0	Low	2	

Follow Up of Prior Year

	Implemented	Partially Implemented	Outstanding	
Critical	0	0	0	
High	0	0	0	
Medium	0	0	5	
Low	0	0	1	

2. Background and Scope

Introduction

This review was undertaken as part of the 2010/11 Internal Audit Plan agreed by the Audit and Governance Committee.

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Scope of review

In accordance with our Terms of Reference (Appendix 3), agreed with the Chief Accountant we undertook a limited scope audit of Treasury Management.

This limited scope audit involved a review of the design of the key controls together with detailed testing to determine whether the controls are operating in practice.

Limitations of scope

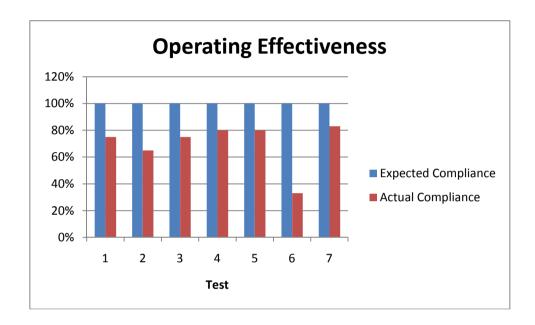
The scope of our work was limited to those areas identified in the terms of reference.

3. Overall Evaluation

Summary of findings

Objective	Total number of issues	ber Number of control				Number of operating effectiveness issues			
		Critical	High	Medium	Low	Critical	High	Medium	Low
Policies and procedures are in place over corporate treasury activities.		0	0	0	0	0	0	1	0
Management information is produced and reported for treasury activities.		0	0	0	0	0	0	0	0
Cash flow is managed and forecast on a regular basis.		0	0	2	0	0	0	0	0
Controls around investments are in place.		0	0	0	0	0	0	3	0
Borrowing arrangements are agreed and plans are in place to ensure repayment.	0	0	0	0	0	0	0	0	0
Banking arrangements are in place and only authorised individuals can process transactions.		0	0	0	0	0	0	1	2
All bank accounts are subject to regular independently reviewed reconciliations to the ledger system via the cashbook and reasons for any imbalance properly investigated and auctioned.		0	3	0	0	0	0	0	0

Compliance Summary



Tests Performed:

- 1. Interbank transactions authorised by appropriate personnel and supported by confirmations.
- 2. Investments and CHAPs payments authorised by appropriate personnel.
- 3. Investment details documented on approved forms.
- 4. Interest calculations agreed to third party confirmations.
- 5. Financial Director users are still employed by the Council.
- 6. Bank reconciliations signed and dated as prepared and reviewed.
- 7. Reconciling items included on Bank reconciliations cleared on a timely basis.

4. Findings and Recommendations

Issue 1: Procedure Notes Control Design

Control objective: All bank accounts are subject to regular independently reviewed reconciliations to the ledger system via the cashbook and reasons for any imbalance properly investigated and auctioned.

Matters arising

There are currently no procedure notes in place for the General Fund bank reconciliation process.

Risks arising

Officers may be unaware of roles and responsibilities, leading to an increased risk of error.

Recommendations

Procedure notes should be drawn up for all Bank Reconciliations and circulated to responsible officers. Procedures should be reviewed on an annual basis and updated for any changes in working practices.

Management response

Priority

Medium

Management response

Whilst the process was being developed the procedure notes were also being drafted, these have now been written and reviewed

Action plan

By whom: Anna Winship

Implementation date: Implemented

Control objective: All bank accounts are subject to regular independently reviewed reconciliations to the ledger system via the cashbook and reasons for any imbalance properly investigated and auctioned.

Matters arising

The following issues were noted when testing 6 months of bank reconciliations:

- 4/6 reconciliations had not been signed to indicate both performance and review;
- In 1/6 cases, the reconciliation (June 2010) was performed 2 months following the period end; and
- 1 reconciling item of £421k in the Drawings Account reconciliation was not cleared for over 3 months, although this issue has now been rectified.

Risks arising

Balances may not be accurate. If reconciliations are not reviewed there is an increased risk that errors and omissions may not be noted.

Recommendations

Efforts should be made to ensure that reconciling items are cleared on a timely basis. Best practice would indicate this should be within1 month. All reconciliations should be signed and dated to evidence independent preparation and review.

Management response

Priority

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Medium

Management response

A target completion date for reconciliations of within 10days of the month end has now been set, with review to be performed by the end of the month.

All completed reconciliations have now been reviewed and signed off.

Action plan

By whom: Anna Winship/Kelly Dawson

Implementation date: With Immediate Effect

Issue 3: Policies and Procedures Operating Effectiveness

Control objective: Policies and procedures are in place over Corporate Treasury Activities.

Matters arising

Neither the Corporate Treasury Management Strategy nor the bank mandate lists have been updated to reflect recent changes in personnel and procedures. There are currently no procedure notes in place for borrowing practices.

Risks arising

Policies do not reflect current working practices.

Recommendations

All key policies and procedures should be reviewed and updated to reflect current working practices and personnel.

Management response

Priority

Medium

Management response

Bank mandates and TMPs have now been updated for recent changes in staff. Procedure notes for borrowing have not previously been required, but have now

been drafted for review

Action plan

By whom: Anna Winship

Implementation date: Implemented

Control objective: Controls around investments are in place.

Matters arising

Investment transactions are summarised on investment reports and reconciled to the ledger on a monthly basis. Investment reports were not run for April and May 2010 due to staff absence. In addition, investment reconciliations are not signed to indicate performance and review.

Risks arising

Investment balances may not be accurate and complete.

Recommendations

Investment reports and reconciliations should be produced on a monthly basis and the latter signed to evidence timely and independent performance and review.

Management response

Priority

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Medium

Management response

There was a vacancy in the treasury position for the period April to September and during the early part of this the Treasury Management reconciliations were not completed due to pressures of work. They were caught up with in May and are now completed on a monthly basis and reviewed regularly

Action plan

By whom: Anna Winship

Implementation date: Implemented

Issue 5: Interbank transfers Operating Effectiveness

Control objective: Banking arrangements are in place and only authorised individuals can process transactions.

Matters arising

As per Council procedures, all interbank transfers should be approved by 3 separate authorisations. Only 2 authorisations were obtained for 1 of the 4 transactions tested.

Risks arising

Bank transfers may be made without appropriate authorisation.

Recommendations

Bank transfers should not be processed without agreed levels of authorisation.

Management response

Priority

Medium

Management response

Now that the Treasury Management post has been filled controls will be put in place to ensure that all transactions are appropriately approved.

Checks will be put in place as part of the daily procedures to ensure this is completed.

Action plan

By whom: Anna Winship

Implementation date: Implemented

Issue 6: Overdrafts Control Design

Control objective: Cash flow is managed and forecast on a regular basis.

Matters arising

The Council does not perform regular monitoring of overdrafts and limits. Council accounts have been overdrawn 6 times in year, the largest deficit exceeding £4million.

Risks arising

Overdraft limits may be exceeded and interest incurred unnecessarily.

Recommendations

Investigations should be undertaken in order to identify in what instances overdrafts are used. Action points should be put in place to avoid unnecessary use of the facility.

Overdraft limits should be reviewed on a six monthly basis to ensure that they are reasonable and sufficient.

Management response

Priority



Medium

Management response

Overdrafts are monitored as part of the daily treasury activities, and once the accounts are overdrawn, money is transferred between accounts.

We have an agreement with the bank that all accounts are accumulated therefore charges should not be incurred if an individual account is overdrawn

Action plan

By whom: Anna Winship

Implementation date: Ongoing

Issue 7: Cash Management Control Design

Control objective: Cash flow is managed and forecast on a regular basis.

Matters arising

The Council prepares a rolling cash flow forecast which is updated on a daily basis. Whilst this is operating effectively, there is no comparison made against initial budgets.

Risks arising

Cash flow assumptions are not reviewed. Budgetary control may not be robust.

Recommendations

Actual cash flows should be compared to original budgets on a periodic basis. All variances should be investigated and revised assumptions used for future cash flow setting.

Management response

Priority

Medium

Management response

Progress is being made to improve the cashflow to ensure that forecasts are compared against actual movements.

Action plan

By whom: Anna Winship

Implementation date: 31st January 2011

Control objective: Controls around investments are in place

Matters arising

The Council's procedure notes stipulate that all investments should be authorised by 3 individuals. All supporting documentation should be retained on file and CHAPS forms signed before payment. During the testing of 20 investments, the following exceptions were noted:

- 5/20 input forms (Daily Treasury Figures) had not been completed in full with all investment information;
- 3/20 CHAPS forms had not been signed to indicate authorised and 1/20 forms was not provided for audit. A further 2 forms were authorised by officers not included on the Authorised Signatory Listing (ASL);
- A summary of deals had not been attached to the investment documentation in 13/20 cases; and
- 4/20 investments had been authorised by a temporary employee who was not detailed on the ASL.

Risks arising

Inappropriate and unauthorised investments may be made. Council funds may be exposed to higher risk.

Recommendations

The Council should ensure that third party documentation confirming investments is retained on file.

All investments and accompanying CHAPS forms should be signed by an authorised officer.

Management response

Priority

Medium

Management response

All paperwork for each treasury investment is completed by an officer and checked by at least one other officer on occasions this may not be evidence via signature, although this should happen. This will be highlighted to all officers involved in the process to ensure that this is always completed.

Third party confirmation will be actively chased if not received automatically.

Action plan

By whom: Anna Winship

Implementation date: 31st January 2011

Issue 9: Investment Interest Operating Effectiveness

Control objective: Controls around investments are in place.

Matters arising

All interest due from investments should be recalculated on a monthly basis and agreed to supporting confirmations from third parties. In 2/20 investments tested, interest payments had not been calculated by the Council despite the maturity date passing. In a further 4 cases, supporting documentation was not held from the third party to validate the interest received.

Risks arising

Interest may not be received accurately.

Recommendations

Interest due should be recomputed for all investments and agreed to 3rd party confirmations.

Management response

Priority

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Medium

Management response

All interest due from each investment is calculated at the time the investment is made, and this is logged on a spreadsheet, and at the end of each month this spreadsheet is reconciled to Agresso to ensure that all interest due has been received.

Action plan

By whom: Anna Winship

Implementation date: Implemented

Issue 10: Instant Access Account Control Design

Control objective: All bank accounts are subject to regular independently reviewed reconciliations to the ledger system via the cashbook and reasons for any imbalance properly investigated and auctioned.

Matters arising

The Council does not perform monthly bank reconciliations for their 'Instant Access' account. It was noted, however, that this account is no longer in use. It was agreed in prior year that this account would be closed.

Risks arising

Bank balances may be inaccurate or incomplete.

Recommendations

The Instant Access account should be closed.

Management response

Priority

Medium

Management response

The Instant Access Account is used on a small number of occasions, therefore will not be closed. It is used when receipts are received late in the day to be able to invest them or put the money into our MMF.

Reconciliation of this account will be completed as part of the monthly management reconciliations

Action plan

By whom: Anna Winship

Implementation date: 31st December 2010

Issue 11: Financial Director Operating Effectiveness

Control objective: Banking arrangements are in place and only authorised individuals can process transactions.

Matters arising

Financial Director (the Council's online banking facility) and Treasury Management procedure notes have not been updated since September 2007.

The Council does not possess a Financial Director manual explaining how to use the system.

Risks arising

Procedure notes may not reflect current working practices leading to an increased risk of error.

Recommendations

Procedure notes should be reviewed and updated to reflect any changes in working practices.

Management response

Priority

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Low

Management response

Procedure notes for how to use FD are in place, however system admin procedure notes are not in place.

Financial Director is to be upgraded in early 2011, therefore procedure notes will be completed at this point.

Action plan

By whom: Anna Winship/Dave Swan **Implementation date:** 31st March 2011

Issue 12: Financial Director Access	Operating Effectiveness				
Control objective: Banking arrangements are in place and only authorised individuals can process transactions.					
Matters arising					
1/5 Financial Director users tested were no longer employed by the Council for Treasury Management functions.					
Risks arising					
Increased risk of misappropriation of systems and information.					

Recommendations

Access lists for the Financial Director system should be reviewed to remove all users no longer requiring access.

Management response

IV	management response							
	Priority	Management response	Action plan					
	•	All users have now been updated on Financial Director, and processes put in place						
	Low	to review the users on a quarterly basis.	By whom: Anna Winship/Dave Swan					
			Implementation date: 31 st December 2010					

5. Follow Up of Prior Year Recommendations

Ref	Control weakness found	Risk rating	Recommendations	Management response	Follow up
1	The Council prepares a rolling cash flow forecast which is updated on a daily basis. Whilst this is operating effectively, there is no comparison made against initial budgets.	• Medium	Actual cash flows should be compared to original budgets on a periodic basis. All variances should be investigated and revised assumptions used for future cash flow setting.	Agreed A monthly comparison of budgeted cashflows to actual will be performed and reviewed. This will allow analysis of assumptions for cashflows used in subsequent years. Anna Winship/Sheena Sievert 31st December 2009	Outstanding Reraised in issue #7
2	The Council does not perform regular monitoring of overdrafts and limits. At the time of audit, 2 of the Council's bank accounts were overdrawn.	Medium	Investigations should be undertaken in order to identify in what instances overdrafts are used. Action points should be put in place to avoid unnecessary use of the facility. Overdraft limits should be reviewed on a six monthly basis to ensure that they are reasonable and sufficient.	Agreed The cashflow forecast is produced on a net basis and therefore individual overdrafts are not reviewed. Bank balances will be reviewed on a daily basis to ensure that the use of overdrafts is minimised. Anna Winship 31st December 2009	Outstanding Reraised in issue # 6
3	The Council does not perform monthly bank reconciliations for their 'Instant Access' account. It was noted, however, that this account is no longer in use.	Medium	The Instant Access account should be closed.	Agreed The Instant Access account is not reconciled because it has not been used for a number of years. Agreed that this will be closed. Anna Winship/Sheena Sievert 31st December 2009	Outstanding Reraised in issue # 10

Ref	Control weakness found	Risk rating	Recommendations	Management response	Follow up
4	Financial Director (the Councils online banking facility) and Treasury Management procedure notes have not been updated since September 2007. The Council does not possess a Financial Director manual explaining how to use the system.	Low	Procedure notes should be reviewed and updated to reflect any changes in working practices.	Agreed A Manual will be requested from the Co-op and used to review procedure notes for Financial Director and Treasury Management processes. Anna Winship 31st December 2009	Outstanding Reraised in issue # 11
5	The Council's procedure notes stipulate that all investments should be authorised by 2 individuals. All supporting documentation should be retained on file and CHAPS forms signed before payment. During the testing of 20 investments, the following exceptions were noted: In 3/20 cases, third party documentation was not retained to validate investments; 1/20 CHAPS forms had not been authorised; and 3/20 investments had not been authorised by 2 officers.	Medium	The Council should ensure that third party documentation confirming investments is retained on file. All investments and accompanying CHAPS forms should be signed by an authorised officer.	Agreed It is acknowledged that in the cases noted the controls did not operate effectively. In the future the stated controls will be applied. Anna Winship With immediate effect	Outstanding Reraised in issue # 8
6	There are currently a number of users who have access to the Financial Director (FD) system who no longer work at the Council. In addition, the Council does not maintain a user access list stipulating user's FD permissions.	• Medium	The Council should enquire with Financial Director to ascertain whether the functionality of the system would be affected if old users were removed. Former employees should be removed as a matter of urgency. A formal user list should be created, detailing the access rights for each user. This should be reviewed on an annual basis.	Agreed Access lists will be updated with permissions. Dave Swann 31st December 2009	Outstanding Reraised issue # 12

Appendix 1 – Basis of our Opinion

Individual risk ratings

Each of the control weaknesses identified have been categorised according to risk as follows:

Risk rating	Assessment rationale
Critical	A control weakness that could have a: • Significant impact in the achievement of the organisation's operational objectives as set out in its operational plan; or • Material financial impact on the organisation (quantify); or • Significant breach in laws and regulations resulting in severe fines or consequences; or • Critical impact on the reputation of the organisation which could threaten its future viability.
High	 A control weakness that could have a: Significant impact in the achievement of the objectives of the system, function or process under review as set out in the terms of reference; or Significant financial impact on the organisation (quantify); or Breach in laws and regulations resulting in fines and consequences which are significant to the system, function or process under review but not the overall organisation; or Significant impact on the reputation of the organisation.
Medium	 A control weakness that could have a: Moderate impact in the achievement of the objectives of the system, function or process under review as set out in the terms of reference; or Moderate financial impact on the organisation (quantify); or Breach in laws and regulations resulting in fines and consequences which impact but are not significant to the system, function or process under review; or Moderate impact on the reputation of the organisation.
Low	 A control weakness that could have a: Minor impact on the achievement of the objectives of the system, function or process under review as set out in the terms of reference; or Minor financial impact on the organisation (quantify); or Minor breach in laws and regulations with limited consequences; or Minor impact on the reputation of the organisation.

Assurance ratings

The table below details the assurance ratings for grading individual audits:

Level of assurance	Description
High	No control weaknesses were identified; or Our work found some low impact control weaknesses which, if addressed would improve overall control. However, these weaknesses do not affect key controls and are unlikely to impair the achievement of the objectives of the system. Therefore we can conclude that the key controls have been adequately designed and are operating effectively to deliver the objectives of the system, function or process.
Moderate	There are some weaknesses in the design and/or operation of controls which could impair the achievement of the objectives of the system, function or process. However, either their impact would be less than significant or they are unlikely to occur.
Limited	There are some weaknesses in the design and / or operation of controls which could have a significant impact on the achievement of key system, function or process objectives but should not have a significant impact on the achievement of organisational objectives. However, there are discrete elements of the key system, function or process where we have not identified any significant weaknesses in the design and / or operation of controls which could impair the achievement of the objectives of the system, function or process. We are therefore able to give limited assurance over certain discrete aspects of the system, function or process.
No	There are weaknesses in the design and/or operation of controls which [in aggregate] could have a significant impact on the achievement of key system, function or process objectives and may put at risk the achievement of organisation objectives.

Appendix 2 – Limitations and Responsibilities

Limitations inherent to the internal auditor's work

We have undertaken this review of Treasury Management subject to the limitations outlined below. This is an independent assurance report and our work has been performed in accordance with ISAE 3000 ("International Standard on Assurance Engagements").

Internal control

Internal control, no matter how well designed and operated, can provide only reasonable and not absolute assurance regarding achievement of an organisation's objectives. The likelihood of achievement is affected by limitations inherent in all internal control systems. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Future periods

The assessment of controls relating to Treasury Management is at the present date. Historic evaluation of effectiveness is not relevant to future periods due to the risk that:

- the design of controls may become inadequate because of changes in operating environment, law, regulation or other; or
- the degree of compliance with policies and procedures may deteriorate.

Responsibilities of management and internal auditors

It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.

We shall endeavour to plan our work so that we have a reasonable expectation of detecting significant control weaknesses and, if detected, we shall carry out additional work directed towards identification of consequent fraud or other irregularities. However, internal audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected.

Accordingly, our examinations as internal auditors should not be relied upon solely to disclose fraud, defalcations or other irregularities which may exist, unless we are requested to carry out a special investigation for such activities in a particular area.

Appendix 3 – Terms of Reference

Objectives

Our objective is to undertake a review of Treasury Management to ensure an adequate level of controls exists and compliance with council policy in respect of cash flow management, investments and borrowings.

Deliverables

Our deliverable will be a report detailing our findings with regard to our assessment of the design and effectiveness of controls in place over Treasury Management and the level of assurance we can place on the control environment.

Information Requirements

Listed below is information that may be required at the commencement of the audit:

- Copies of procedure notes;
- Treasury Management policies;
- > Details of all bank accounts held and corresponding mandates;
- Listing of all inter account transfers made;
- Access to annual and periodic cash flow forecasts;
- Management information and performance reports produced;
- Treasury Management reconciliations (to General Ledger);
- > Listing of all investments and borrowings made for the year to date;
- Access to all third party documentation (e.g. certificates);
- Bank reconciliations performed;
- Copies of insurance documents; and
- Access lists for online banking systems.

The list is not intended to be exhaustive. Evidence should be available to support all operating controls. Other information arising from our review of the above documentation may be requested on an ad hoc basis.

Scope and Approach

Our work will focus on identifying the guidance, procedures and controls in place to mitigate key risks through:

- > Documenting the underlying guidance, policy and processes in place and identifying key controls;
- Considering whether the policies and procedures in place are fit for purpose; and
- Testing key controls.

The key points that we will focus on are:

- Policies and procedures in place over corporate treasury activities;
- Management information and reporting on treasury activities;
- Cash flows are managed and forecast on a regular basis;
- Controls around investments are in place;
- Borrowing arrangements are agreed and plans are in place to ensure repayment;
- Banking arrangements are in place and only authorised individuals can process transactions; and
- All bank accounts are subject to regular independently reviewed reconciliations to the ledger system via the cashbook and reasons for any imbalance properly investigated and auctioned.

Limitations of Scope

The scope of our work will be limited to those areas identified in the terms of reference. Corporate debt recovery procedures will be covered as part of a dedicated debtors review.

Stakeholders and responsibilities

Role	Contact	Responsibilities
Chief Accountant	Anna Winship	 Review draft terms of reference. Review and meet to discuss issues arising and develop management responses and action plan. Review draft report. Implement agreed recommendations and ensure ongoing compliance.
Interim Head of Finance	Nigel Kennedy	 Receive agreed terms of reference. Receive draft and final reports.
Chief Executive	Peter Sloman	Receive final report.
Corporate Director for Finance and Efficiency	Jackie Yates	

Our team

Role	Contact
Chief Internal Auditor	Chris Dickens
Audit Manager	Katherine Bennett
Auditor	Charlotte Bilsland

Timetable

The timetable for this review is as follows:

TOR approval	September 2010
ΤΟΙ αρριοναί	September 2010
Fieldwork commencement	20 September 2010
Fieldwork completed	T + 1 weeks
Draft report of findings issued	T + 3 weeks
Receipt of Management response	T + 5 weeks
Final report of findings issued	T + 7 weeks

Our budget for this assignment is 5 days. If the number of days required to perform this review increases above the number of days budgeted, we will bring this to management attention.

