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Internal Audit Risk Assessment and Plan 2014/15

DRAFT

Oxford City Council

April 2014

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Contents

Distribution List

For action	Members of the Audit and Governance Committee
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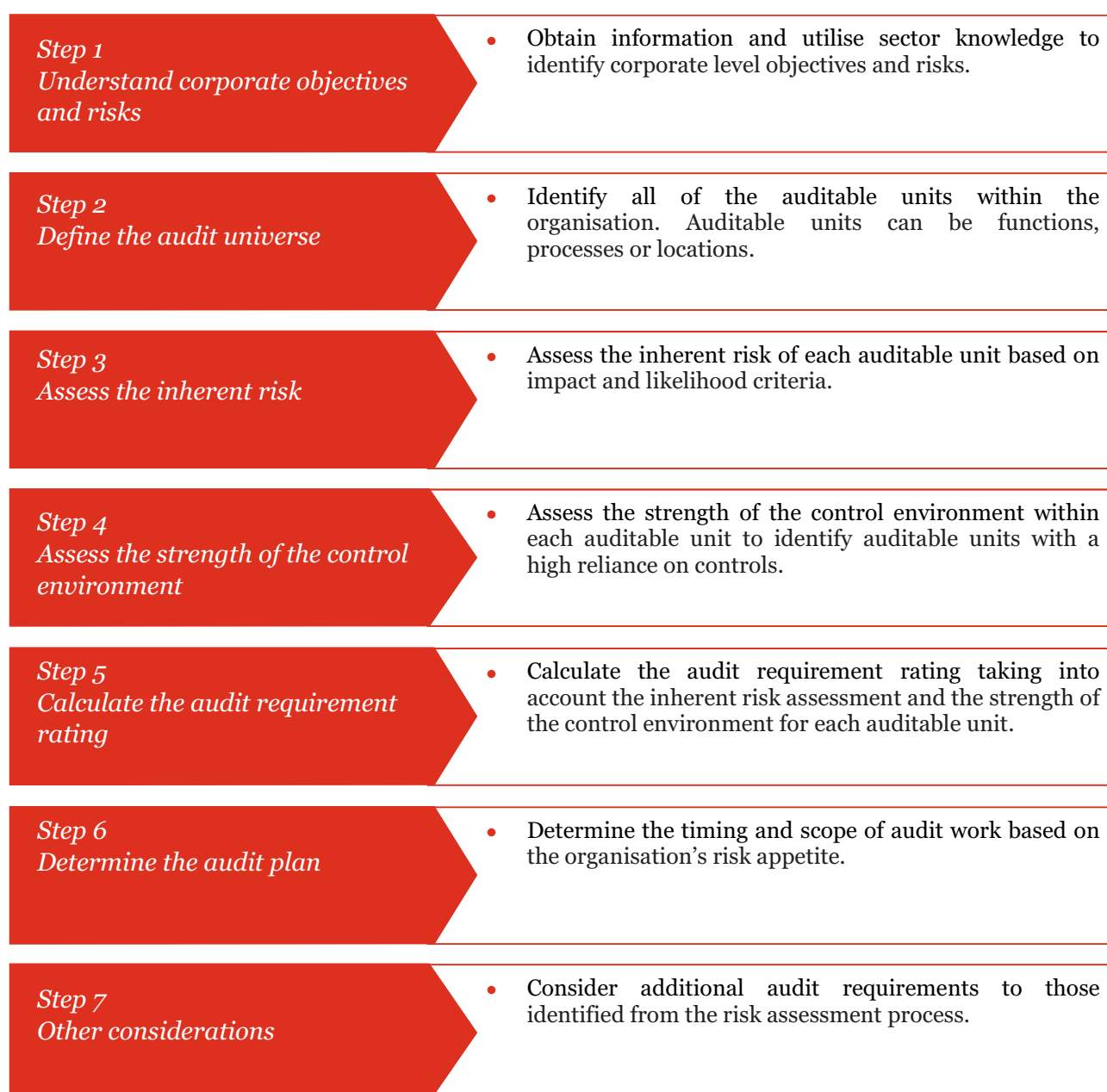
1. Introduction and approach

Introduction

This document sets out the risk assessment and our internal audit plan for Oxford City Council.

Approach

The internal audit service will be delivered in accordance with the Internal Audit Charter. A summary of our approach to undertaking the risk assessment and preparing the internal audit plan is set out below. The internal audit plan is driven by Oxford City Council's organisational objectives and priorities, and the risks that may prevent Oxford City Council from meeting those objectives. A more detailed description of our approach can be found in Appendix 1 and 2.

Step 1 *Understand corporate objectives and risks*	• Obtain information and utilise sector knowledge to identify corporate level objectives and risks.
Step 2 *Define the audit universe*	• Identify all of the auditable units within the organisation. Auditable units can be functions, processes or locations.
Step 3 *Assess the inherent risk*	• Assess the inherent risk of each auditable unit based on impact and likelihood criteria.
Step 4 *Assess the strength of the control environment*	• Assess the strength of the control environment within each auditable unit to identify auditable units with a high reliance on controls.
Step 5 *Calculate the audit requirement rating*	• Calculate the audit requirement rating taking into account the inherent risk assessment and the strength of the control environment for each auditable unit.
Step 6 *Determine the audit plan*	• Determine the timing and scope of audit work based on the organisation's risk appetite.
Step 7 *Other considerations*	• Consider additional audit requirements to those identified from the risk assessment process.

Basis of our plan

In order to carry out the level of work that our risk assessment indicates is appropriate, we estimate that the resource requirement for Oxford City Council's internal audit service is 220 days and £84,500. Based on our risk assessment, this is the level of resource that we believe would be necessary to evaluate the effectiveness of risk management, control and governance processes. The level of agreed resources for the internal audit service for 1 April 2014 to 31 March 2015 is 220 days and £84,500, and therefore the plan does not purport to address all key risks identified across the audit universe as part of the risk assessment process. Accordingly, the level of internal audit activity represents a deployment of limited internal audit resources and in approving the risk assessment and internal audit plan, the Audit and Governance Committee recognises this limitation.

Delivery

The internal audit service comprises a number of reviews. Each review addresses one or more risks or systems, and is scoped to identify the relevant controls and monitoring, and then to test their operation.

There is a "Protocol" for the delivery of the internal audit service which establishes responsibilities of auditors and auditees, covering the whole process from agreeing terms of reference to implementation of recommendations. This is shared with each auditee at the first point of contact, and has been attached to the Internal Audit Charter which is a separate document that we update and present to the Audit and Governance Committee on an annual basis.

Reporting

We recognise that it is essential that reports are produced and monitored in a timely and effective manner. Formal reports will be produced for each review identified in our internal audit plan, unless an alternative deliverable is agreed. Following completion of fieldwork, findings will be discussed at a clearance meeting with the audit sponsor and reports will be produced in line with the final report grading and circulation arrangements, as set out in the Internal Audit Charter.

Final reports receiving a risk classification of "Medium Risk" or above will be sent to the Audit and Governance Committee, along with a progress report which will summarise the work performed since the previous Committee meeting, and will highlight any areas of weakness and high priority recommendations.

Basis of our annual internal audit conclusion

Internal audit work will be performed in accordance with PwC's Internal Audit methodology which is aligned to Public Sector Internal Audit Standards. As a result, our work and deliverables are not designed or intended to comply with the International Auditing and Assurance Standards Board (IAASB), International Framework for Assurance Engagements (IFAE) and International Standard on Assurance Engagements (ISAE) 3000.

Our annual internal audit opinion will be based on and limited to the internal audits we have completed over the year and the control objectives agreed for each individual internal audit. The agreed control objectives will be reported within our final individual internal audit reports.

In developing our internal audit risk assessment and plan we have taken into account the requirement to produce an annual internal audit opinion by determining the level of internal audit coverage over the audit universe and key risks. We do not believe that the level of agreed resources will impact adversely on the provision of the annual internal audit opinion.

Other sources of assurance

In developing our internal audit risk assessment and plan we have taken into account other sources of assurance and have considered the extent to which reliance can be placed upon these other sources. Other sources of assurance for each auditable unit are noted in our Risk Assessment in section 3 of this document, and a summary is given below.

The other sources of assurance for Oxford City Council are as follows:

- External audit work;

- External inspections and awards;
- ISO accreditations; and
- The outcomes of previous internal audit reviews.

We do not intend to place reliance upon these other sources of assurance.

Key contacts

Meetings have been held with the following key personnel during the planning process:

Name, Job Title Organisational Development and Corporate Services	Name, Job Title Community Services	Name, Job Title City Regeneration and Housing
Jackie Yates, Executive Director	Tim Sadler, Executive Director	David Edwards, Executive Director
Simon Howick. Head of Human Resources and Facilities	Graham Bourton, Head of Oxford Direct Services	Jane Winfield, Regeneration and Major Projects Team
Jeremy Thomas, Head of Law and Governance (Monitoring Officer)	Ian Brooke, Head of Leisure, Parks and Communities	Stephen Clarke, Head of Housing and Property
Helen Bishop, Head of Customer Services	John Copley, Head of Environmental Development	Michael Crofton-Briggs, Head of City Development
Nigel Kennedy, Head of Finance (Section 151 Officer)	Peter McQuitty, Head of Policy, Culture and Communications	
Jane Lubbock, Head of Business Improvement and Technology		

2. *Audit universe, corporate objectives and risks*

Audit universe

We have identified the auditable units within the Council based on the Council's structure and meetings with Officers and Members. Any processes running across a number of different elements in the Council and which can be audited once have been separately identified under cross-cutting reviews in the audit universe.

Corporate objectives and risks

Corporate level objectives and risks have been determined by Oxford City Council. The corporate level objectives and risks have been considered when preparing the internal audit plan and have been mapped to the auditable units.

The corporate level objectives as documented in the "Corporate Plan 2013-17" are recorded in the table below.

Objective	Cross reference to Internal Audit Plan (see Section 4)
Vibrant, Sustainable Economy: A strong local economy, supported by effective education and training centre.	VE.1 Planning Applications
Meeting Housing Needs: More affordable, high quality housing in Oxford. This is essential for the vibrancy of the economy and the health and well-being of residents.	A3. Housing Benefits A4. Housing Rents VE.2 Void Properties VE.3 Discretionary Housing Payments and Social Funds
Strong, Active Communities: Communities that are socially cohesive and safe, and citizens who are actively engaged in pursuing their own well-being and that of their communities.	B4. Sports Pitch and Facility Bookings
Cleaner, Greener Oxford: A cleaner, greener Oxford: in the city centre, in our neighbourhoods and in all public spaces.	C1. Carbon Budgeting
Efficient, Effective Council: A flexible and accessible organisation, delivering high-quality, value-for-money services.	All of our cross cutting process reviews address this objective along with reviews in the following areas: • B.3 Managing Capital Projects • VE.5 Contract Management with IT Suppliers and Smarter Procurement • VE.6 Streamlining Year End Close Down Processes

We have also reviewed the Corporate Risk Register presented to the Audit and Governance Committee on 27 February 2013 and linked all risks scoring in excess of 8 gross points to our audit plan.

Risk(s) to the achievement of objectives	Cross reference to Internal Audit Plan (see Section 4)
CRR-019 ICT Resilience: Resilience of ICT function managing projects and improvements alongside business as usual.	VE.5 Contract Management with IT Suppliers and Smarter Procurement

Risk(s) to the achievement of objectives	Cross reference to Internal Audit Plan (see Section 4)
CRR-022 Welfare Reform: Changes to legislation regarding Welfare Reform will impact financially, directly and indirectly on the Council.	A.3 Housing Benefits VE.3 Discretionary Housing Payments and Social Funds
CRR-023 Managing Capital Projects and Contract Management: The need to ensure efficient management of capital projects and contracts.	B.3 Managing Capital Projects

3. Risk assessment

Risk assessment

Our risk assessment is based on:

- A review of the Council's risk registers;
- Consultation with a number of key stakeholders across the Council;
- A review of relevant documentation and reports;
- Our knowledge of the Council and results of Internal Audit work in 2013/14; and
- Our broader understanding of local government and the broader public sector.

Our risk assessment is limited to matters emerging from the processes listed above. We will review and update this assessment and the resulting plan annually. We will continually review the plan with management as risks emerge or change in priority and, with the approval of the Audit and Governance Committee, ensure that audit resources are appropriately focused.

A full risk assessment is included below. In order to carry out the risk assessment, we have defined all the auditable activities and processes in the Council (defined as the 'audit universe') and risk assessed each separate element of the audit universe (defined as 'auditable units') applying the methodology outlined in Appendix 1 and 2. This approach helps to ensure that we have a complete understanding of all areas in the Council which should be subject to Internal Audit and that these have been assessed on a Council-wide level.

From this risk assessment we have identified the areas that we propose to audit in 2014/15 and these have been included in the Internal Audit Plan in section 4.

Risk assessment results

Each auditable unit has been assessed for inherent risk and the strength of the control environment, in accordance with the methodology set out in Appendix 1 and 2. The results are summarised in the table below.

Ref	Auditable Unit	Corporate objectives and risks	Inherent Risk Rating	Control Environment Indicator	Audit Requirement Rating	Colour code	Frequency
A	**Cross Cutting Systems**						
A.1	General Ledger	Efficient, effective Council	6	4	4	🟠	Annual
A.2	Debtors		6	3	5	🟠	Annual
A.3	Creditors		6	3	5	🟠	Annual
A.4	Payroll		6	4	4	🟠	Annual
A.5	Budgetary Control		6	4	4	🟠	Annual
A.6	Collection Fund		6	4	4	🟠	Annual
A.7	Treasury Management		5	4	3	🟡	Every 2

Ref	Auditable Unit	Corporate objectives and risks	Inherent Risk Rating	Control Environment Indicator	Audit Requirement Rating	Colour code	Frequency
							years
A.8	Housing Benefits		6	4	4	🟠	Annual
A.9	Fixed Assets		6	4	4	🟠	Annual
A.10	VAT		3	3	2	🟡	Every 3 years
A.11	Housing Rents		6	4	4	🟠	Annual
A.12	Risk Management		6	4	4	🟠	Annual
B	**Department Level**						
	Organisational Development and Corporate Services						
B.1	Human Resources and Facilities	Efficient, effective Council	5	3	4	🟠	Annual
B.2	Law and Governance		5	4	3	🟡	Every 2 years
B.3	Customer Services		5	3	4	🟠	Annual
B.4	Finance		5	3	4	🟠	Annual
B.5	Business Improvement and Technology		5	4	3	🟡	Every 2 years
	Community Services						
B.6	Oxford Direct Services	Cleaner, greener Oxford	5	3	4	🟠	Annual
B.7	Leisure, Parks and Communities	Stronger, active communities	3	2	2	🟡	Every 3 years
B.8	Environmental Development	Cleaner, greener Oxford	3	2	2	🟡	Every 3 years
B.9	Policy, Culture and Communications	Vibrant, sustainable economy	3	2	2	🟡	Every 3 years
	City Regeneration and Housing						
B.10	Regeneration and Major Projects Team	Vibrant, sustainable economy	5	4	3	🟡	Every 2 years
B.11	Housing and Property	Meeting housing needs	5	3	4	🟠	Annual

Ref	Auditable Unit	Corporate objectives and risks	Inherent Risk Rating	Control Environment Indicator	Audit Requirement Rating	Colour code	Frequency
B.12	City Development	Stronger, active communities	5	4	3	🟡	Every 2 years

Key to frequency of audit work

Audit Requirement Rating	Frequency – PwC standard approach	Colour Code
6	Annual	🔴
5	Annual	🔴
4	Annual	🔴
3	Every two years	🟡
2	Every three years	🟡
1	No further work	🟢
	Key areas of focus	🟡🔴

The audit requirement rating drives the frequency of internal audit work for each auditable unit. Our recommended planning approach involves scheduling an annual audit when the rating ranges from 6 to 4, an audit every two years when the rating is 3 and an audit every three years when the rating is 2.

The internal audit budget of £84,500 and 220 days means our recommended planning approach can't be followed. Therefore, the frequency with which internal audits are scheduled has been flexed. This means all auditable units can now be audited over a three year cycle given the size of the internal audit budget. Flexing the frequency means management and Audit and Governance Committee is accepting an increased risk appetite.

4. Annual plan and internal audit performance

Annual plan and indicative timeline

The following table sets out the internal audit work planned for 1 April 2014 to 31 March 2015, together with indicative start dates for each audit.

Ref	Auditable Unit	Indicative number of audit days	Q1	Q2	Q3	Q4
A	**Cross Cutting Systems**					
	Value Protection Reviews					
A.1	**Finance Systems:** Fixed Assets: • Asset movement controls • Management of Capital Programme • Early substantive testing • Effectiveness of new fixed asset register General Ledger: • Key control account reconciliations • Input and output controls • System enhancements • System integrity Payroll: • Changes to standing data • Payment process • Expenses and flexi time • System integrity • Implementation of new pensions regulations IT based testing (CAATs) to cover each of the above systems and reporting of transactions against controls.	16			✔	
A.2	**Debtors and Creditors** Debtors: • Raising sales orders • Billing processes • Debt collection and recovery • Accounting for debtors Income Collection: • Safeguarding of cash • Banking procedures • Recording of income Creditors: • Order and invoice process • Payments process • Creditor system outputs	16			✔	

Ref	Auditable Unit	Indicative number of audit days	Q1	Q2	Q3	Q4
	• Post implementation review of P2P and integration with Agresso IT based testing (CAATs) to cover each of the above systems and reporting of transactions against controls.					
A.3	**Collection Fund (Council Tax and NNDR)** • Calculation of liabilities • Billing processes • Debt collection and recovery • Exceptions • System integrity • Arrangements for changes in legislation • Management/maximisation of the Council's retained element including best practice of other Council's • IT based testing (CAATs) and reporting of transactions against controls.	12		✔		
A.4	**Housing Benefits** • Benefits processing • Calculation and payment of benefits and subsidy • Quality checking • Student income and child care disregards claims • Classification between HRA and non-HRA • Calculation of earnings • Reconciliation between subsidy to software balancing report • IT based testing (CAATs) and reporting of transactions against controls.	10		✔		
A.5	**Housing Rents** • Rent collection and recovery • Temporary accommodation income • Accounting and banking arrangements • Arrears management and performance • IT based testing (CAATs) and reporting of transactions against controls.	10		✔		
A.6	**Budgetary Control, Risk Management and Performance** Budgetary control: • Budget setting • Budget monitoring • Management and monitoring of efficiency savings and income collection/generation activities Risk management and performance: • Review of risk management arrangements for adequacy • Use of performance monitoring software and integration with P2P • Data quality spot checks • Use of increased functionality and access to integrated reporting	13			✔	
A.6	**VAT and Treasury Management** VAT: • Preparation of the VAT return • Income and expenditure process and VAT recovery Treasury Management: • Corporate treasury activities are monitored and controlled	10				✔

Ref	Auditable Unit	Indicative number of audit days	Q1	Q2	Q3	Q4
	• Reporting and monitoring of treasury management activities					
	Sub Total	**87**				
B	**Department Level**					
	Value Protection Reviews					
B.1	**Finance – Year End Support** Year end accounts support in June 2015.	5				[✔]
B.2	**Car Parking** • Cash collection • Accounting for income • Excess charge notice processes • Credit card payment	7		✔		
B.3	**Managing Capital Projects** • Creation of capital programme • Approval of capital programme • Monitoring of projects • Response to slippage • Reporting	10			✔	
B.4	**Sports Pitch and Facility Bookings** • Review of controls and processes for bookings • Accounting for income • Cash management and collection of income	8		✔		
	Sub Total	**117**				
V	**Value Enhancement Reviews**					
VE.1	**Planning Applications** • Review of the action plan to manage planning and building control for adequacy and to ensure applications are processed effectively • Has the action plan been implemented?	10		✔		
VE.2	**Void Properties (Council Housing)** • Review of processes including changes for void properties for adequacy • Implementation of changes • Are processes and controls operating effectively?	10			✔	
VE.3	**Discretionary Housing Payments and Social Funds** • Review of controls and processes for award and payment of Discretionary Housing Payments • Review of the changes introduced for the award of Discretionary Housing Payments due to increased demand and what are other local authorities doing to minimise impact to the Council • Review of the exposure of the Council for unmet Social Fund demand considering who received payments previously, whether they were residents in the City and whether they meet the statutory obligations for Social Funds.	10			✔	
VE.4	**Post Implementation Review Business Rates and Council Tax Collection** • Review of new processes and controls which have been introduced for Business Rates and Council Tax collection for adequacy	10				✔

Ref	Auditable Unit	Indicative number of audit days	Q1	Q2	Q3	Q4
	• Review of processes and controls for discounts for adequacy • Are processes and controls operating effectively? • Comparison of existing processes against best practice					
VE.5	**Contract Management with IT Suppliers and Smarter Procurement** • Contract management diagnostic to assess the importance of the contract area against the maturity/robustness of control processes • Assessment of the structure of the IT partnership including allocation of roles and responsibilities and risk sharing between the parties and how these are managed. • Review of existing procurement processes for IT with comparison to others to identify areas for improvement • How value for money is achieved	12		✔		

VE.6	**Streamlining Year End Close Down Processes**
	• Review of existing year end processes for Collection Fund/rent accounts/billing which may include:
	   o Use of system vs manual processes
	   o Robustness of reconciliations
	   o Timetable for year-end close down and reporting
	   o Allocation of roles and responsibilities
	   o Hand-over between teams
	• Comparison of existing processes against best practice
	• How effectively systems are used
		16	✔			

	Sub Total	**185**				
	Follow Up	5	✔	✔	✔	✔
	Audit Management	25	✔	✔	✔	✔
	Contingency	15	✔	✔	✔	✔
	2014/15 Sub Total	**230**				
C	**2013/14 Roll Forward**					
C.1	**Environmental Development – Carbon Budgeting** Two part review: • Phase one to focus on learning from others through sharing good practice and benchmarking information • Phase two to focus on reviewing improvements against the Council's plans to improve beyond scope 1 compliance.	10	✔			
C.2	**Corporate Property – Health and Safety** • Are processes in place adequate? • Are policies being adhered to? • How have new processes and initiatives been implemented and communicated? • Is the system being kept up to date? • Are roles, responsibilities and reporting requirements clear? • Is data retention adequate?	5	✔			
	2014/15 Total	**245**				

In addition to these services, we will provide a range of benefits to the Council at no additional cost which include:

- Regular technical updates and alerts from PwC Assurance on topics including accounting changes and new legislation;
- Circulation of recent publications by PwC and PwC's Public Sector Research Institute plus ad hoc reports;
- Provision of thought leadership pieces;
- Ad hoc briefings for the Audit Committee (e.g. risk management and local government finance); and
- An invitation for the Chair of Audit Committee and officers to attend our local training days.

Key performance indicators

Appendix 4 sets out the proposed Key Performance Indicators for internal audit. Performance against these indicators will be reported quarterly to the Audit and Governance Committee.

Appendix 1: Detailed methodology

Step 1 - Understand corporate objectives and risks

In developing our understanding of your corporate objectives and risks, we have:

- Reviewed your Corporate Plan 2013-17 and Strategic Risk Register;
- Drawn on our knowledge of the Local Government sector; and
- Met with a number senior management and non-executive members.

Step 2 - Define the Audit Universe

In order that the internal audit plan reflects your management and operating structure we have identified the audit universe for Oxford City Council made up of a number of auditable units. Auditable units include functions, processes, systems, products or locations. Any processes or systems which cover multiple locations are separated into their own distinct cross cutting auditable unit.

Step 3 - Assess the inherent risk

The internal audit plan should focus on the most risky areas of the business. As a result each auditable unit is allocated an inherent risk rating i.e. how risky the auditable unit is to the overall organisation and how likely the risks are to arise. The criteria used to rate impact and likelihood are recorded in Appendix 2.

The inherent risk assessment is determined by:

- Mapping the corporate risks to the auditable units;
- Our knowledge of your business and its sector; and
- Discussions with management.

Impact Rating	Likelihood Rating					
	6	**5**	**4**	**3**	**2**	**1**
6	6	6	5	5	4	4
5	6	5	5	4	4	3
4	5	5	4	4	3	3
3	5	4	4	3	3	2
2	4	4	3	3	2	2
1	4	3	3	2	2	1

Step 4 - Assess the strength of the control environment

In order to effectively allocate internal audit resources we also need to understand the strength of the control environment within each auditable unit. This is assessed based on:

- Our knowledge of your internal control environment;
- Information obtained from other assurance providers; and
- The outcomes of previous internal audit reviews.

Step 5 - Calculate the audit requirement rating

The inherent risk and the control environment indicator are used to calculate the audit requirement rating. The formula ensures that our audit work is focused on areas with high reliance on controls or a high residual risk.

Inherent Risk Rating	Control design indicator					
	1	2	3	4	5	6
6	6	5	5	4	4	3
5	5	4	4	3	3	n/a
4	4	3	3	2	n/a	n/a
3	3	2	2	n/a	n/a	n/a
2	2	1	n/a	n/a	n/a	n/a
1	1	n/a	n/a	n/a	n/a	n/a

Step 6 - Determine the audit plan

Your risk appetite determines the frequency of internal audit work at each level of audit requirement. Auditable units may be reviewed annually, every two years or every three years.

In some cases it may be possible to isolate the sub-process (es) within an auditable unit which are driving the audit requirement. For example, an auditable unit has been given an audit requirement rating of 5 because of inherent risks with one particular sub-process, but the rest of the sub-processes are lower risk. In these cases it may be appropriate for the less risky sub-processes to have a lower audit requirement rating be subject to reduced frequency of audit work. These sub-processes driving the audit requirement areas are highlighted in the plan as key sub-process audits.

Step 7 - Other considerations

In addition to the audit work defined through the risk assessment process described above, we may be requested to undertake a number of other internal audit reviews such as regulatory driven audits, value enhancement or consulting reviews. These have been identified separately in the annual plan.

Appendix 2: Risk assessment criteria

Determination of Inherent Risk

We determine inherent risk as a function of the estimated **impact** and **likelihood** for each auditable unit within the audit universe as set out in the tables below.

Impact rating	Assessment rationale
6	Critical impact on operational performance; or Critical monetary or financial statement impact (materiality); or Critical breach in laws and regulations that could result in material fines or consequences; or Critical impact on the reputation or brand of the organisation which could threaten its future viability.
5	Significant impact on operational performance; or Significant monetary or financial statement impact (materiality/2); or Significant breach in laws and regulations resulting in large fines and consequences; or Significant impact on the reputation or brand of the organisation.
4	Major impact on operational performance; or Major monetary or financial statement impact (materiality/4); or Major breach in laws and regulations resulting in significant fines and consequences; or Major impact on the reputation or brand of the organisation.
3	Moderate impact on the organisation's operational performance; or Moderate monetary or financial statement impact (materiality/8); or Moderate breach in laws and regulations with moderate consequences; or Moderate impact on the reputation of the organisation.
2	Minor impact on the organisation's operational performance; or Minor monetary or financial statement impact (materiality/16); or Minor breach in laws and regulations with limited consequences; or Minor impact on the reputation of the organisation.
1	Insignificant impact on the organisation's operational performance; or Insignificant monetary or financial statement impact (materiality/32); or Insignificant breach in laws and regulations with little consequence; or Insignificant impact on the reputation of the organisation.

58

Likelihood rating	Assessment rationale
6	Has occurred or probable in the near future
5	Possible in the next 12 months
4	Possible in the next 1-2 years
3	Possible in the medium term (2-5 years)
2	Possible in the long term (5-10 years)
1	Unlikely in the foreseeable future

Appendix 3: Key performance indicators

Key performance indicators

To ensure your internal audit service is accountable to the Audit and Governance Committee and management, we have proposed the following key performance indicators.

KPI	Target	Responsible
Infrastructure		
Audits budgeted v actual	100%	Internal Audit
Planning		
Percentage of audits with Terms of Reference	100%	Internal Audit
Audit sponsor contacted	**No less than 4 weeks** before the start of audit fieldwork	Internal Audit
Meeting between Audit Sponsor and Internal Audit to agree scope of review	**No less than 3 weeks** before the start of audit fieldwork	Internal Audit and Audit Sponsor
Draft scope issued to Audit Sponsor and Head of Service for agreement	**No less than 3 weeks** before the start of audit fieldwork	Internal Audit
Fieldwork		
Exit meeting to confirm matters arising from the audit.	**No more than 1 week** after the completion of fieldwork	Internal Audit and Audit Sponsor
Reporting		
Initial draft report issued to Audit Sponsor, Head of Service, Executive Director, Head of Finance, Executive Director Organisational Development and Corporate Services and other agreed stakeholders	**No more than 2 weeks** after exit meeting	Internal Audit
Report finalised, and circulated.	**No more than 1 week** after final draft report has been issued.	Internal Audit
Attendance at Audit and Governance Committee	100%	Internal Audit

In the event that, pursuant to a request which Oxford City Council has received under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 (as the same may be amended or re-enacted from time to time) or any subordinate legislation made thereunder (collectively, the "Legislation"), Oxford City Council is required to disclose any information contained in this document, it will notify PwC promptly and will consult with PwC prior to disclosing such document. Oxford City Council agrees to pay due regard to any representations which PwC may make in connection with such disclosure and to apply any relevant exemptions which may exist under the Legislation to such [report]. If, following consultation with PwC, Oxford City Council discloses any this document or any part thereof, it shall ensure that any disclaimer which PwC has included or may subsequently wish to include in the information is reproduced in full in any copies disclosed.

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