

CIPFA Better Governance Forum

Audit Committee Update

- helping audit committees to be effective

Issue 10

Public Sector Internal Audit Standards

Regular briefing on current issues

March 2013

An Introduction to the Public Sector Internal Audit Standards (PSIAS)

The Relevant Internal Audit Standards Setters¹ for the public sector agreed that from 1 April 2013 there shall be a common set of internal audit professional standards across the sectors. The standards encompass the mandatory elements of the Institute of Internal Auditors International Professional Practices Framework. Additional requirements and interpretations for the UK public sector have been included where required. The work in compiling the standards has been guided by an advisory board² made up of internal audit practitioners from across the public sector.

The UK Public Sector Internal Audit Standards (PSIAS) replace previous codes and standards, including the *Code of Practice for Internal Audit in Local Government* published by CIPFA and the *Government Internal Audit Standards* (GIAS).

While the PSIAS come into force from April it is not expected that all elements will be in place on day one. Many of the standards apply to activities that will happen later on in the audit year, for example audit reports, annual audit reporting and quality assurance and improvement processes. Some of the standards will need to be addressed early on however, in particular the development and approval of the audit charter and the completion of the risk-based audit plan.

The PSIAS comprise the definition of internal audit, a code of ethics and a series of attribute and performance standards. The new definition of internal audit is:

'Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.'

The full standards are available to download from the CIPFA website.

CIPFA is also publishing a *Local Government Application Note* (LGAN) to support internal auditors transferring from the CIPFA Code of Practice to the PSIAS. The Application Note includes a checklist for assessing conformance with the PSIAS and LGAN which can be used to support the external assessment requirements of the PSIAS. This publication will be available from the CIPFA shop shortly.

Proper practices for local government

The Department for Communities and Local Government (CLG) has given both the PSIAS and LGAN the status of "proper practices" for internal audit in organisations covered by the Accounts and Audit Regulations 2011. This includes local authorities, police and fire bodies in England.

¹ The Relevant Internal Audit Standard Setters are: HM Treasury in respect of central government; the Scottish Government, the Department of Finance and Personnel Northern Ireland and the Welsh Government in respect of central government and the health sector in their administrations; the Department of Health in respect of the health sector in England (excluding Foundation Trusts); and the Chartered Institute of Public Finance and Accountancy in respect of local government across the UK.

² Internal Audit Standards Advisory Board, see <http://www.cipfa.org/Policy-and-Guidance/Technical-Panels-and-Boards/UK-Public-Sector-Internal-Audit-Standards-Advisory-Board>

PSIAS – The Role of the Audit Committee

The following article identifies the key aspects of the PSIAS that will be of most interest to an audit committee member. It is not a complete summary of all the standards but it does highlight those where there is most likely to be engagement between internal audit and the audit committee.

Key concepts

The PSIAS use the term 'the board' throughout the standards to define particular governance and accountability roles. It is recognised that in different organisations the application of who the board is will be different but CIPFA expects that in many cases it will be appropriate to consider the audit committee as undertaking these roles.

In adopting the standards each organisation needs to define who will be undertaking the roles.

The following analysis identifies some of the key aspects of the PSIAS and highlights those areas where the audit committee could fulfil what is required from 'the board' in the PSIAS. A comments section suggests how the standards might relate to existing practices or how they can be further developed.

Please note that it is up to each organisation to set out in the internal audit charter which body will undertake the role of the board. The following table includes suggestions of how the role of the board could be applied to the audit committee. Reference should always be made to the original standards and LGAN when drawing up the charter.

PSIAS areas of interest	Potential role of the audit committee	Comments
Code of Ethics The four components of the code of ethics are: <ol style="list-style-type: none"> 1. integrity 2. objectivity 3. confidentiality 4. competency Public sector requirement Internal auditors who work in the public sector must also have regard to the Committee on Standards of Public Life's Seven Principles of Public Life.	The audit committee should be aware of the requirement on internal auditors to conform to the code of ethics in addition to the code of ethics of their professional institute.	The seven principles of public life are often incorporated into internal codes of conduct, so internal auditors may already be required to comply with these. Where internal audit is a contracted service this may be a requirement of the service specification.

PSIAS areas of interest	Potential role of the audit committee	Comments
Attribute standards		
<p>Internal audit charter The charter defines the internal audit activity's purpose, authority and responsibility. It also:</p> <ul style="list-style-type: none"> establishes the internal audit activity's position within the organisation the chief audit executive's functional reporting relationship with the board authorises access to records, personnel and physical properties and defines the scope of internal audit activities. <p>(1000 Purpose, Authority and Responsibility)</p> <p>The LGAN requires the role of the statutory officers in relation to internal audit to be defined in the charter.</p>	<p>The charter needs to define the terms 'board' and 'senior management' for the purposes of internal audit activity so the charter will need to define when the audit committee will act as 'the board'.</p> <p>Approval is by the board.</p>	<p>Given the audit committee's responsibilities for the oversight of the audit process it would be expected that the audit committee would review the charter.</p>
<p>Independence and objectivity</p> <p>To achieve the degree of independence necessary to effectively carry out the responsibilities of the internal audit activity, the chief audit executive has direct and unrestricted access to senior management and the board.</p> <p>(1100 Independence and Objectivity)</p> <p>The chief audit executive (CAE)³ must confirm to the board, at least annually, the organisational independence of the internal audit activity.</p> <p>(1110 Organisational Independence)</p>	<p>Functional reporting that could be undertaken by the audit committee to ensure the organisational independence of internal audit include:</p> <ul style="list-style-type: none"> approving the charter approving the risk based internal audit plan approving the internal audit budget and resource plan receiving communications from the chief audit executive on the internal audit activity's performance making appropriate enquiries to determine whether there are inappropriate scope or resource limitations. 	<p>It is likely that the audit committee already undertakes these roles and that they are set out in both the existing internal audit and audit committee terms of reference. The latter document may need updating to incorporate the PSIAS.</p> <p>The audit committee should ensure that when it undertakes these tasks it is mindful of the importance of ensuring the independence of internal audit.</p> <p>The standards also include two further functional reporting roles:</p> <ul style="list-style-type: none"> approving decisions regarding the appointment and removal of the chief audit executive

³ The 'chief audit executive' is the title used in PSIAS to refer to the head of internal audit.

PSIAS areas of interest	Potential role of the audit committee	Comments
	The public sector requirement states that the CAE should have unfettered access to the chair of the audit committee.	<ul style="list-style-type: none"> • approving the remuneration of the chief audit executive. <p>The public sector requirement is that as a minimum feedback from the chair of the audit committee should be sought for the performance appraisal of the CAE.</p> <p>Other options could be the involvement of the chair in the recruitment of a new CAE.</p>
<p>Impairment to independence or objectivity</p> <p>If independence or objectivity is impaired, details must be disclosed to appropriate parties.</p> <p>Public sector requirement 'Approval must be sought from the board for any significant additional consulting services not already included in the audit plan, prior to accepting the engagement.'</p> <p>(1130 Impairment to Independence or Objectivity)</p>	<p>Impairment to independence and objectivity, including conflicts of interest, should be reported to the audit committee.</p> <p>As well as discussing retrospectively with the CAE the performance of internal audit against the plan, the audit committee should monitor and approve plans that could potentially divert internal audit resources away from planned assurance work.</p>	<p>Note the PSIAS cover the 'appearance' of impairment as well as actual impairment.</p> <p>Some discussion might be needed to agree what the definition of 'significant' might be.</p> <p>Where audit committees meet less frequently than once per month, a practical arrangement might be for the approval to be given by the chair of the audit committee and reported at the next meeting.</p>
<p>Proficiency and due professional care</p> <ul style="list-style-type: none"> • Internal auditors must possess the knowledge, skills and other competencies needed to perform their individual responsibilities. • Internal auditors must apply the care and skill expected of a reasonably prudent and competent internal auditor. • Internal auditors must enhance their knowledge, skills and other competencies through continuing professional development. <p>(1200 Proficiency and Due Professional Care)</p>	<p>There are no specific requirements on the audit committee from this section of the standards, although the audit committee should be aware of what is required from its internal team.</p> <p>There is a public sector requirement that states: 'The chief audit executive must hold a professional qualification (CMIIA, CCAB or equivalent) and be suitably experienced.'</p>	<p>The audit committee will wish to consider this, for example if it contributes to the recruitment of a new CAE.</p>

PSIAS areas of interest	Potential role of the audit committee	Comments
<p>Quality Assurance and Improvement Programme (QAIP)</p> <p>The quality assurance and improvement programme (QAIP) must include both internal and external assessments.</p> <p>Internal:</p> <ul style="list-style-type: none"> On-going performance monitoring. Periodic self-assessments. <p>External:</p> <ul style="list-style-type: none"> At least once every five years by a qualified, independent assessor from outside the organisation. <p>Public sector requirement The chief audit executive must agree the scope of external assessments with an appropriate sponsor, eg the Accounting/Accountable Officer or chair of the audit committee.</p> <p>Public sector requirement The results of the quality and assurance programme and progress against any improvement plans must be reported in the annual report.</p> <p>Public sector requirement Instances of non-conformance must be reported to the board. More significant deviations must be considered for inclusion in the governance statement.</p> <p>(1300 Quality Assurance and Improvement Programme)</p>	<p>The chief audit executive must discuss with the board the:</p> <ul style="list-style-type: none"> form of external assessments qualifications and independence of the external assessor. <p>In local government the audit committee will need to bear in mind that internal audit need to conform with the <i>Local Government Application Note</i> also.</p>	<p>The audit committee probably already receives performance information about the internal audit function, during the year and also in the annual report of the head of internal audit.</p> <p>To meet the QAIP the requirement is to review the compliance against the PSIAS. The audit committee should review the scope of the external assessment and be satisfied with the appointment of the external assessor. It should then receive the reports and findings of both the internal and external assessments.</p> <p>For local government there is a requirement to review annually the effectiveness of internal audit to support the annual governance statement under the Accounts and Audit (England) Regulations 2011.</p> <p>This review may cover wider governance arrangements in order to judge 'effectiveness'. For example the effectiveness of the audit committee itself in progressing internal audit issues could be included.</p>

PSIAS areas of interest	Potential role of the audit committee	Comments
Performance Standards		
<p>Managing the internal audit activity</p> <p>The chief audit executive must establish risk-based plans to determine the priorities of the internal audit activity, consistent with the organisation's goals.</p> <p>Public sector requirement</p> <p>The risk-based plan must take into account the requirement to produce an annual internal audit opinion and the assurance framework.</p> <p>(2000 Managing the Internal Audit Activity)</p>	<p>The input of senior management and the board must be considered in the documentation of the risk assessment.</p>	<p>It would seem reasonable for the CAE to consult the audit committee on the risks facing the organisation and for this to be included in the risk assessment informing the risk-based plan.</p> <p>The audit committee is likely to be the principal audience for the annual internal audit opinion, so it is important that the audit committee is clear about the audit work underpinning this. The annual internal audit opinion will form a significant part of meeting the audit committee's own assurance needs.</p>
<p>Managing the internal audit activity</p> <p>The chief audit executive must communicate the internal audit activity's plans and resource requirements, including significant interim changes, to senior management and the board for review and approval.</p> <p>(2020 Communication and Approval)</p> <p>The chief audit executive must ensure that internal audit resources are appropriate, sufficient and effectively deployed to achieve the approved plan.</p> <p>Public sector requirement</p> <p>The risk-based plan must explain how internal audit's resource requirements have been assessed. Where the chief audit executive believes that the level of agreed resources will impact adversely on the provision of the annual internal audit opinion, the consequences must be brought to the attention of the board.</p> <p>(2030 Resource Management)</p>	<p>The audit committee is likely to receive the plan for approval and should be advised of significant changes during the year.</p> <p>When reviewing the plan it should be clear to the audit committee what the resource requirements are to deliver the plan.</p> <p>It is the responsibility of the CAE to bring to the committee's attention any concerns about resources and especially the impact on the internal audit opinion.</p>	<p>The issue of resourcing is difficult to define as it is based on the risk assessment of the organisation and the need for assurance, including the needs of the audit committee itself, combined with the professional judgement of the CAE. Resourcing requirements cover not just numbers of staff but also the knowledge, skills and experience of the internal audit team and the extent to which the team can place reliance on other sources of assurance.</p> <p>Realistically, internal audit resources will come under pressure when the organisation has to undertake significant cost-cutting as a result of budget pressures.</p> <p>The audit committee can play an important part in ensuring that professional standards are maintained, assurance needs are properly assessed and that resource levels are not compromised unduly.</p>

PSIAS areas of interest	Potential role of the audit committee	Comments
<p>Reporting to senior management and the board</p> <p>Periodic reports should include the following:</p> <ul style="list-style-type: none"> internal audit activity's purpose, authority, responsibility and performance relative to its plan significant risk exposures and control issues, including fraud risks, governance issues and other matters needed or requested by senior management and the board <p>(2060 Reporting to Senior Management and the Board)</p>	<p>The audit committee should ensure that its agendas provide for regular reports from internal audit and that the reports include the matters specified in the standards.</p>	
<p>Nature of work</p> <p>The internal audit activity must evaluate and contribute to the improvement of governance, risk management and control processes using a systematic and disciplined approach.</p> <p>Aspects of internal audit work include:</p> <ul style="list-style-type: none"> the governance process ethical governance IT governance the effectiveness of risk management processes. <p>Evaluation of risks and control measures relating to:</p> <ul style="list-style-type: none"> achievement of strategic objectives reliability and integrity of financial and operational information effectiveness and efficiency of operations and programmes safeguarding of assets compliance with laws, regulations, policies, procedures and contracts the potential for fraud and how the organisation manages fraud risk. <p>(2100 Nature of Work)</p>	<p>The audit committee should understand the nature of internal audit work and the expectation of professional standards to provide assurance over the full range of governance, risk management and control processes.</p> <p>This will be of particular significance when reviewing the risk-based plan.</p>	<p>The committee should look for coverage of the specific areas listed when reviewing the audit plan, while remembering that the plan is risk-based and cannot hope to include comprehensive assurance over every risk and control process.</p> <p>Where it is not clear why a significant risk area is not covered the audit committee should seek an explanation.</p>

PSIAS areas of interest	Potential role of the audit committee	Comments
<p>Engagement planning</p> <p>Internal auditors must develop and document a plan for each engagement, including the engagement's objectives, scope, timing and resource allocations.</p> <p>Adequate criteria are needed to evaluate governance, risk management and controls.</p> <p>Public sector interpretation</p> <p>In the public sector, criteria are likely to include value for money.</p> <p>(2200 Engagement Planning)</p>	<p>There are no specific requirements for the audit committee in respect of this section of the standards, although it is helpful for audit committee members reviewing the findings of audit reports to be aware of how the standards shape the content of the audit.</p>	<p>In respect of the public sector interpretation regarding value for money, audit committees may wish to discuss with their internal audit providers how internal audit provide assurance over value for money and what other sources of assurance are available.</p>
<p>Performing the engagement</p> <p>Internal auditors must identify, analyse, evaluate and document sufficient information to achieve the engagement's objectives.</p> <p>(2300 Performing the Engagement)</p>	<p>There are no specific responsibilities for the audit committee in respect of this standard other than to recognise the importance of obtaining robust and reliable evidence to support the audit's conclusions.</p>	
<p>Communicating results</p> <p>Internal auditors must communicate the results of engagements.</p> <p>Communications must include the engagement's objectives and scope as well as applicable conclusions, recommendations and action plans.</p> <p>Public sector requirement</p> <p>The chief audit executive must deliver an annual internal audit opinion and report that can be used by the organisation to inform its governance statement.</p> <p>The annual internal audit opinion must conclude on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and control.</p>	<p>Audit committees will be familiar with receiving the results of audits in either full or summary reports. This will continue under PSIAS.</p> <p>The audit committee would normally receive the annual internal audit opinion. The opinion must comply with the public sector requirements laid out in the PSIAS.</p>	<p>The timing of the annual opinion will need to be planned to fit in with the reporting timetable for the annual governance statement and so should be planned for audit committee meetings accordingly.</p>

PSIAS areas of interest	Potential role of the audit committee	Comments
<p>The annual report must incorporate:</p> <ul style="list-style-type: none"> the opinion a summary of the work that supports the opinion and a statement on conformance with the PSIAS and the results of the quality assurance and improvement programme. <p>(2400 Communicating Results)</p>		
<p>Monitoring progress</p> <p>The chief audit executive must establish and maintain a system to monitor the disposition of results communicated to management.</p> <p>(2500 Monitoring Progress)</p>	<p>The PSIAS require a follow up process but do not specify that process should include the audit committee.</p>	<p>The follow up of audit recommendations is a common area reviewed by audit committees.</p> <p>Good practice for audit committee suggests that this is an area where the committee can have an impact on the risk and control environment of the organisation and where the committee can add value to the effectiveness of the audit process.</p>
<p>Communicating the acceptance of risks</p> <p>When the chief audit executive concludes that management has accepted a level of risk that may be unacceptable to the organisation, the chief audit executive must discuss the matter with senior management. If the chief audit executive determines that the matter has not been resolved, the chief audit executive must communicate the matter to the board.</p> <p>(2600 Communicating the Acceptance of Risks)</p>	<p>There is a role for the audit committee to review those risks accepted by management, where the CAE has concerns that the level of risk to the organisation may be unacceptable.</p>	<p>The terms of reference of the audit committee may include the review of actions recommended by internal audit and the effectiveness of control measures by the managers responsible. For example, audit committees may review key areas of risk and discuss with the managers responsible how audit recommendations are being implemented or alternatives considered.</p>

Key questions to ask

1. What is the organisation's plan for adopting the standards from April 2013?
2. Are there any changes the audit committee needs to make to its terms of reference or its approach to support the implementation of the standards?
3. Does the chief audit executive have any concerns about conformance with the standards? Will an action plan be developed to implement any changes required and achieve conformance by the end of March 2014?
4. Are the roles and responsibilities of 'the board' clearly allocated to the audit committee or other body?
5. What opportunities are there to improve the effectiveness of internal audit within the organisation?

Diana Melville
Governance Advisor
CIPFA Better Governance Forum