

AUDIT & GOVERNANCE COMMITTEE

4 JUNE 2025

IMPLEMENTATION OF THE GLOBAL INTERNAL AUDIT STANDARDS IN THE UK PUBLIC SECTOR & INTERNAL AUDIT CHARTER 2025/26

Report by Executive Director of Resources

RECOMMENDATION

The committee is RECOMMENDED to:

- a) Note the update on implementation of the Global Internal Audit Standards**
- b) Approve the Internal Audit Charter for 2025/26**
- c) Note the Quality Assurance and Improvement Programme.**

Executive Summary

1. This report provides the Audit & Governance Committee with an update on the implementation of the new Global Internal Audit Standards in the UK Public Sector. It presents both the Internal Audit Charter and the Quality Assurance and Improvement Programme for 2026/26. These are subject to annual review.

Global Internal Audit Standards (GIAS) in the UK Public Sector

Introduction

2. From 1 April 2025 it is expected that internal audit teams in the public sector will be working to the new Global Internal Audit Standards (GIAS) and the Application Note, to be referred to as the Global Internal Audit Standards in the UK Public Sector. These replace the previous Public Sector Internal Audit Standards (PSIAS). Whilst 1 April 2025 is the effective date of the new standards, internal audit teams are not expected to demonstrate full conformance on this date. Internal audit teams are expected to work in conformance with the new standards from 1 April 2025 and by doing so will build up conformance. By the end of 2025/26 when the head of internal audit annual opinion is produced, internal audit should be able to confirm full conformance.

3. The GIAS guide the worldwide professional practice of internal auditing and serve as a basis for evaluating and elevating the quality of the internal audit function. The new GIAS are organised over 5 domains and have 15 guiding principles across these domains that enable effective internal auditing. Each principle is supported by standards that contain requirements, considerations for implementation, and examples of evidence of conformance. Together, these elements intend to help internal auditors achieve the principles and fulfil the Purpose of Internal Auditing. One of the requirements of the new standards is that the Audit & Governance committee are informed of the new standards and how they will be applied.
4. CIPFA (Chartered Institute of Public Finance and Accountancy) have developed a Code of Practice for the Governance of Internal Audit in the UK Local Government, which is designed to work alongside the new internal audit standards. It is intended to support authorities in establishing their internal audit arrangements and providing oversight and support for internal audit. It is expected that authorities will be required to explain how they comply with the code within the annual governance statement.

Changes to standards

5. Many of the changes in the new standards are about Internal Audit functions better demonstrating and evidencing its compliance to principals in the standards. As an internal audit team that fully conforms with the previous Public Sector Internal Audit Standards most of the practices are already in place.
6. Examples of changes include:
 - One of the new requirements is a 'mandate' for internal audit. However in local government, internal audit's primary mandate comes from statutory regulations issued by the national governments. This was already referred to in our previous internal audit charter however has been made explicit within our revised internal audit charter for 2025.
 - There is a requirement for an internal audit strategy. We have previously presented the Internal Audit Strategy and Plan to the committee each year, however for 2025/26 this has been strengthened in line with the requirements of the new standards to include the internal audit service vision and objectives.
 - The standards on ethics and professionalism have been expanded including new sections on professional courage and professional scepticism. This will require training for the team and is built in as an action within the Quality Assurance and Improvement Programme for 2025/26.
 - Internal audit plans should support the achievement of the organisation's objectives. We already demonstrate the link by including this within the annual internal audit plan against each audit assignment.

- As well as significant control weaknesses, Internal Audit should identify and communicate to the Audit & Governance Committee and Senior Management the root cause for the issues that are reported. This could also include thematic or systematic issues or actions. Development of improved reporting of root causes is included within the Quality Assurance and Improvement Programme for 2025/26.
7. The changes to standards have required the Internal Audit Charter, template reports/documents and the Internal Audit Manual to be updated. Revisions to the Internal Audit Manual will continue to be made throughout the year as we work through the new standards.
 8. Internal Audit were subject to an external assessment in November 2023 against the previous Public Sector Internal Audit Standards. The results were reported to the Audit & Governance Committee in January 2024 and confirmed that we fully conformed. A detailed self-assessment against the new standards will be undertaken in 2025/26 and reported to the Audit & Governance Committee once complete. The next external assessment will be due in 2028.
 9. Implementation of the required actions to ensure compliance with the new standards will be monitored via the Internal Audit Quality Assurance and Improvement Programme, progress against which is reported to the Audit & Governance Committee.

Internal Audit Charter

10. Global Internal Audit Standards in the UK Public Sector (GIAS) requires that an Internal Audit Charter is in place, which sets out the purpose and mandate of Oxfordshire County Council's Internal Audit function, in accordance with the GIAS. The Internal Audit Charter establishes the position of Internal Audit within the organisation, access and reporting requirements. It also outlines the key responsibilities of the Audit & Governance Committee.
11. Whilst the requirement for an internal audit charter is not new, to evidence conformance with the new standards it has required the charter to be re-written. The new charter follows a recommended template that was issued by the Institute of Internal Auditors, to support the implementation of the new standards. Because the structure and headings of the re-written charter are new, it is difficult to set out each change for comparison however the key points of change are as follows:
 - The previous introduction section has been replaced with the definition of the "purpose of the internal audit function".
 - A commitment to adherence to the new standards is now included.

- The mandate for internal audit is now included. This highlights the requirements for Internal Audit as per the Accounts and Audit Regulations 2015.
 - The previous section on Independence is now broader, covering Independence, Organisational Position and Reporting Relationships.
 - The section on Audit & Governance Committee oversight is now more detailed, although there are no significant changes in context / responsibilities.
 - We have retained the section on Fraud and Corruption which is not including within the recommended template but reflects the organisational arrangement within Oxfordshire County Council whereby the Internal Audit and Counter Fraud functions are managed under the same service.
12. The updated Internal Audit Charter, included in Annex 1 is subject to approval by the Audit & Governance Committee of Oxfordshire County Council on an annual basis, in line with GIAS requirements.

Quality Assurance Improvement Programme (QAIP)

13. The GIAS require that the internal audit activity maintain a Quality Assurance and Improvement Programme (QAIP). This is included within Appendix 2.
14. The Chief Internal Auditor is required to communicate to senior management and the Audit & Governance Committee on the internal audit activity's quality assurance and improvement programme, including results of ongoing monitoring at least annually, internal assessments upon completion and external assessments conducted at least every five years. The QAIP details what will be reported to the Audit & Governance Committee and the frequency.
15. Last year's QAIP for 2024/25, included two opportunities for improvement within the internal audit activity. Implementation of those improvements are as follows:

Opportunities for improvement – previously identified for 2024/25:

Opportunity for improvement	Lead Officer	Target Date	Update
Data analytics - to be embedded into the Internal Audit and Counter Fraud assurance activities.	Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager.	Improvements to assurance activities continue to be embedded throughout 2024/25.	Intended progress for 2024/25 achieved. The Counter Fraud Intelligence and Data Officer now works across the Internal Audit and Counter Fraud teams.

			<p>Several audits were completed utilising data analytics and full population testing approaches – this led to improvements in the assurance activities.</p> <p>Members of the team have completed specific training, for example Power Bi.</p> <p>This needs to be a continued focus for 2025/26, building awareness and application across the team.</p>
<p>Internal Audit Standards – New Global Internal Audit Standards will become effective from 9 January 2025. As a result the UK Public Sector Internal Audit Standards are being reviewed. New material and guidance will start to be issued from September 2024, to be implemented by April 2025. We will need to review our processes within the team and make updates to the Internal Audit Charter, audit manual, etc.</p>	<p>Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager.</p>	<p>New standards implemented across team by April 2025.</p>	<p>Intended progress for 2024/25 achieved.</p> <p>Team now conforming to Global Internal Audit Standards from April 2025.</p> <p>Internal Audit Charter has been updated.</p> <p>This needs to be a continued focus for 2025/26, ensuring full conformance.</p>

16. Opportunities for improvement for 2025/26 have been included within the QAIP in Appendix 2. Progress in implementation of these will be reported back to the Audit & Governance Committee.

Financial Implications

17. There are no direct financial implications arising from this report.
Comments checked by: Lorna Baxter, Executive Director of Resources
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Legal Implications

7. There are no direct legal implications arising from this report.
Kim Sawyer, Interim Head of Legal and Governance,
kim.sawyer@oxfordshire.gov.uk

Staff Implications

18. There are no direct staff implications arising from this report.

Equality & Inclusion Implications

19. There are no direct equality and inclusion implications arising from this report.

Sustainability Implications

20. There are no direct sustainability implications arising from this report.

Risk Management

21. There are no direct risk management implications arising from this report.

NAME: Lorna Baxter, Executive Director of Resources

Annex:	Annex 1:	2025/26 Internal Audit Charter
	Annex 2:	2025/26 Internal Audit Quality Assurance Improvement Programme

Contact Officer: Sarah Cox, Chief Internal Auditor,
sarah.cox@oxfordshire.gov.uk

May 2025

ANNEX 1:



Internal Audit Charter for Oxfordshire County Council

The internal audit charter sets out the purpose and mandate of Oxfordshire County Council's internal audit function.

Purpose

The purpose of the internal audit function is to strengthen Oxfordshire County Council's ability to create, protect, and sustain value by providing the Audit & Governance Committee and management with independent, risk-based, and objective assurance, advice, insight, and foresight.

The internal audit function enhances Oxfordshire County Council's:

- Successful achievement of its objectives.
- Governance, risk management, and control processes.
- Decision-making and oversight.
- Reputation and credibility with its stakeholders.
- Ability to serve the public interest.

Oxfordshire County Council's internal audit function is most effective when:

- Internal auditing is performed by competent professionals in conformance with The IIA's Global Internal Audit Standards™, which are set in the public interest.
- The internal audit function is independently positioned with direct accountability to the Audit & Governance Committee.
- Internal auditors are free from undue influence and committed to making objective assessments.

Commitment to Adhering to the Global Internal Audit Standards

Oxfordshire County Council's internal audit function will adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, which are the Global Internal Audit Standards and Topical Requirements (effective from April 2025). The chief audit executive will report annually to the Audit & Governance Committee and senior management regarding the internal audit function's conformance with the Standards, which will be assessed through a quality assurance and improvement program.

Mandate

Authority

The mandate for Oxfordshire County Council's internal audit function is found in the Accounts and Audit Regulations 2015, which states:

'5. (1) A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.

(2) Any officer or member of a relevant authority must, if required to do so for the purposes of the internal audit—

- (a) make available such documents and records; and
- (b) supply such information and explanations

as are considered necessary by those conducting the internal audit.

(3) In this regulation "documents and records" includes information recorded in an electronic form.'

From 1 April 2025, the 'standards or guidance' in relation to internal audit are those laid down in the Global Internal Audit Standards in the UK Public Sector and the Code of Practice for the Governance of Internal Audit in UK Local Government.

The CIPFA statement on the Role of the Chief Financial Officer (In Oxfordshire County Council that role is fulfilled by the Executive Director of Resources and S151 Officer) in Local Government states that:

Internal audit is an important independent internal scrutiny activity. The Chief Financial Officer must support the internal audit arrangements and ensure that the audit committee receives the necessary advice and information, so that both functions can operate effectively.

The internal audit function's authority is created by its direct reporting relationship to the Audit & Governance Committee. Such authority allows for unrestricted access to the Audit & Governance Committee.

The Council authorises the internal audit function to:

- Have full and unrestricted access to all functions, data, records, information, physical property, and personnel pertinent to carrying out internal audit responsibilities. Internal auditors are accountable for confidentiality and safeguarding records and information.
- Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques, and issue communications to accomplish the function's objectives.

- Obtain assistance from the necessary personnel of Oxfordshire County Council and other specialised services from within or outside Oxfordshire County Council to complete internal audit services.

Definition of the Chief Audit Executive (CAE)

Chief Audit Executive describes a person in a senior position responsible for effectively managing the internal audit activity. Within Oxfordshire County Council the Chief Internal Auditor is the designated “Chief Audit Executive”.

Independence, Organisational Position, and Reporting Relationships

The chief audit executive is positioned at a level in the organisation that enables internal audit services and responsibilities to be performed without interference from management, thereby establishing the independence of the internal audit function. (See “Mandate” section.) The chief audit executive will report functionally to the Audit & Governance Committee and organisationally to the Executive Director of Resources and S151 Officer (who has statutory responsibility as proper officer under Section 151 of the Local Government Act 1972, for ensuring an effective system of internal control and proper financial administration of the County Council’s affairs) and the Director of Financial and Commercial Services on day-to-day operations. Both are members of the Senior Leadership Team. This positioning provides the organisational authority and status to bring matters directly to senior management and escalate matters to the Audit & Governance Committee, when necessary, without interference and supports the internal auditors’ ability to maintain objectivity.

The chief audit executive has direct access to the Chief Executive who carries the responsibility for the proper management of the County Council and for ensuring that the principles of good governance are reflected in sound management arrangements. The chief audit executive has direct access to the County Council’s Monitoring Officer. The chief audit executive will confirm to the Audit & Governance Committee, at least annually, the organisational independence of the internal audit function. If the governance structure does not support organisational independence, the chief audit executive will document the characteristics of the governance structure limiting independence and any safeguards employed to achieve the principle of independence. The chief audit executive will disclose to the Audit & Governance Committee any interference internal auditors encounter related to the scope, performance, or communication of internal audit work and results. The disclosure will include communicating the implications of such interference on the internal audit function’s effectiveness and ability to fulfill its mandate.

Changes to the Mandate and Charter

Circumstances may justify a follow-up discussion between the chief audit executive, Audit & Governance Committee, and senior management on the internal audit mandate or other aspects of the internal audit charter. Such circumstances may include but are not limited to:

- A significant change in the Global Internal Audit Standards.
- A significant reorganisation within the organisation.
- Significant changes in the chief audit executive, Audit & Governance Committee, and/or senior management.
- Significant changes to the organisation's strategies, objectives, risk profile, or the environment in which the organisation operates.
- New laws or regulations that may affect the nature and/or scope of internal audit services.

Audit & Governance Committee Oversight

To establish, maintain, and ensure that Oxfordshire County Council's internal audit function has sufficient authority to fulfill its duties, the Audit & Governance Committee will:

- Discuss with the chief audit executive and senior management the appropriate authority, role, responsibilities, scope, and services (assurance and/or advisory) of the internal audit function.
- Ensure the chief audit executive has unrestricted access to and communicates and interacts directly with the Audit & Governance Committee, including in private meetings without senior management present.
- Discuss with the chief audit executive and senior management other topics that should be included in the internal audit charter.
- Participate in discussions with the chief audit executive and senior management about the "essential conditions," described in the Global Internal Audit Standards, which establish the foundation that enables an effective internal audit function.
- Approve the internal audit function's charter, which includes the internal audit mandate and the scope and types of internal audit services.
- Review the internal audit charter annually with the chief audit executive to consider changes affecting the organisation, such as the employment of a new chief audit executive or changes in the type, severity, and interdependencies of risks to the organisation; and approve the internal audit charter annually.
- Approve the risk-based internal audit plan.
- Provide input to senior management on the appointment and removal of the chief audit executive, ensuring adequate competencies and qualifications and conformance with the Global Internal Audit Standards.
- Receive communications from the chief audit executive about the internal audit function including its performance relative to its plan.

- Ensure a quality assurance and improvement program has been established and review the results annually.
- Make appropriate inquiries of senior management and the chief audit executive to determine whether scope or resource limitations are inappropriate.

Internal Audit Resources

The chief audit executive is professionally qualified (CMIIA, CCAB or equivalent), maintains a comprehensive understanding of the Global Internal Audit Standards in the UK Public Sector, has wide internal audit and management experience, reflecting the responsibilities that arise from the need to build and manage an effective internal audit function (including, recruitment, training and development), liaises internally and externally with Members, senior management and other professionals, and demonstrates sound sector knowledge and experience.

Performance of the chief audit executive is monitored and reviewed by the Executive Director of Resources (& S151 officers) and the Director of Commercial and Financial Services.

The Executive Director of Resources (& S151 officer) will provide the chief audit executive with the resources necessary to fulfil the County Council's requirement and expectations to fulfil the audit mandate and delivery of the internal audit strategy. Any resource implications that impact on the delivery of the internal audit mandate will be reported to the Audit & Governance Committee.

Chief Audit Executive Roles and Responsibilities

Ethics and Professionalism

The chief audit executive will ensure that internal auditors:

- Conform with the Global Internal Audit Standards, including the principles of Ethics and Professionalism: integrity, objectivity, competency, due professional care, and confidentiality.
- Understand, respect, meet, and contribute to the legitimate and ethical expectations of the organisation and be able to recognize conduct that is contrary to those expectations.
- Encourage and promote an ethics-based culture in the organisation.
- Report organisational behavior that is inconsistent with the organisation's ethical expectations, as described in applicable policies and procedures.

Internal audit will also have regard to the Committee on Standards of Public Life's Seven Principles, as contained within Oxfordshire County Council's Constitution and Officer's code of conduct:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

Objectivity

The chief audit executive will ensure that the internal audit function remains free from all conditions that threaten the ability of internal auditors to carry out their responsibilities in an unbiased manner, including matters of engagement selection, scope, procedures, frequency, timing, and communication. If the chief audit executive determines that objectivity may be impaired in fact or appearance, the details of the impairment will be disclosed to appropriate parties.

Internal auditors will maintain an unbiased mental attitude that allows them to perform engagements objectively such that they believe in their work product, do not compromise quality, and do not subordinate their judgment on audit matters to others, either in fact or appearance.

Internal auditors will have no direct operational responsibility or authority over any of the activities they review. Accordingly, internal auditors will not implement internal controls, develop procedures, install systems, or engage in other activities that may impair their judgment, including:

- Assessing specific operations for which they had responsibility within the previous year.
- Performing operational duties for Oxfordshire County Council or its affiliates.
- Initiating or approving transactions external to the internal audit function.
- Directing the activities of any Oxfordshire County Council employee that is not employed by the internal audit function, except to the extent that such employees have been appropriately assigned to internal audit teams or to assist internal auditors.

Internal auditors will:

- Disclose impairments of independence or objectivity, in fact or appearance, to appropriate parties and at least annually, such as the chief audit executive, Audit & Governance Committee, management, or others.
- Exhibit professional objectivity in gathering, evaluating, and communicating information.

- Make balanced assessments of all available and relevant facts and circumstances.
- Take necessary precautions to avoid conflicts of interest, bias, and undue influence.

Managing the Internal Audit Function

The chief audit executive has the responsibility to:

- At least annually, develop a risk-based internal audit plan that considers the input of the Audit & Governance Committee and senior management. Discuss the plan with the Audit & Governance Committee and senior management and submit the plan to the Audit & Governance Committee for review and approval.
- Communicate the impact of resource limitations on the internal audit plan to the Audit & Governance Committee and senior management.
- Review and adjust the internal audit plan, as necessary, in response to changes in Oxfordshire County Council's business, risks, operations, programs, systems, and controls.
- Communicate with the Audit & Governance Committee and senior management if there are significant interim changes to the internal audit plan.
- Ensure internal audit engagements are performed, documented, and communicated in accordance with the Global Internal Audit Standards in the UK Public Sector.
- Follow up on engagement findings and confirm the implementation of recommendations or action plans and communicate the results of internal audit services to the Audit & Governance Committee and senior management.
- Ensure the internal audit function collectively possesses or obtains the knowledge, skills, and other competencies and qualifications needed to meet the requirements of the Global Internal Audit Standards and fulfill the internal audit mandate.
- Identify and consider trends and emerging issues that could impact Oxfordshire County Council and communicate to the Audit & Governance Committee and senior management as appropriate.
- Consider emerging trends and successful practices in internal auditing.
- Establish and ensure adherence to methodologies designed to guide the internal audit function.
- Ensure adherence to Oxfordshire County Council's relevant policies and procedures unless such policies and procedures conflict with the internal audit charter or the Global Internal Audit Standards. Any such conflicts will be

resolved or documented and communicated to the Audit & Governance Committee and senior management.

- Maintain awareness of the work of other internal and external providers of assurance and advisory services and consider relying upon these where appropriate.

Communication with the Audit & Governance Committee and Senior Management

The chief audit executive will report at least annually to the Audit & Governance Committee and senior management regarding:

- The internal audit function's mandate.
- The internal audit plan and performance relative to its plan.
- Internal audit budget.
- Significant revisions to the internal audit plan and budget.
- Potential impairments to independence, including relevant disclosures as applicable.
- Results from the quality assurance and improvement program, which include the internal audit function's conformance with The IIA's Global Internal Audit Standards and action plans to address the internal audit function's deficiencies and opportunities for improvement.
- Significant risk exposures and control issues, including fraud risks, governance issues, and other areas of focus for the Audit & Governance Committee that could interfere with the achievement of Oxfordshire County Council's strategic objectives.
- Results of assurance and advisory services.
- Resource requirements.
- Management's responses to risk that the internal audit function determines may be unacceptable or acceptance of a risk that is beyond Oxfordshire County Council's risk appetite.

Quality Assurance and Improvement Program

The chief audit executive will develop, implement, and maintain a quality assurance and improvement program that covers all aspects of the internal audit function. The program will include external and internal assessments of the internal audit function's conformance with the Global Internal Audit Standards, as well as performance measurement to assess the internal audit function's progress toward the achievement of its objectives and promotion of continuous improvement. The program also will assess, if applicable, compliance with laws and/or regulations relevant to internal

auditing. Also, if applicable, the assessment will include plans to address the internal audit function's deficiencies and opportunities for improvement.

Annually, the chief audit executive will communicate with the Audit & Governance Committee and senior management about the internal audit function's quality assurance and improvement program, including the results of internal assessments (ongoing monitoring and periodic self-assessments) and external assessments. External assessments will be conducted at least once every five years by a qualified, independent assessor or assessment team from outside Oxfordshire County Council; qualifications must include at least one assessor holding an active Certified Internal Auditor® credential.

Scope and Types of Internal Audit Services

The scope of internal audit services covers the entire breadth of the organisation, including all of Oxfordshire County Council's activities, assets, and personnel. The scope of internal audit activities also encompasses but is not limited to objective examinations of evidence to provide independent assurance and advisory services to the Audit & Governance Committee and management on the adequacy and effectiveness of governance, risk management, and control processes for Oxfordshire County Council.

The nature and scope of advisory services may be agreed with the party requesting the service, provided the internal audit function does not assume management responsibility. Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during advisory engagements. These opportunities will be communicated to the appropriate level of management. Internal audit engagements may include evaluating whether:

- Risks relating to the achievement of Oxfordshire County Council's strategic objectives are appropriately identified and managed.
- The actions of Oxfordshire County Council's officers, directors, management, employees, and contractors or other relevant parties comply with Oxfordshire County Council's policies, procedures, and applicable laws, regulations, and governance standards.
- The results of operations and programs are consistent with established goals and objectives.
- Operations and programs are being carried out effectively, efficiently, ethically, and equitably.
- Established processes and systems enable compliance with the policies, procedures, laws, and regulations that could significantly impact Oxfordshire County Council.
- The integrity of information and the means used to identify, measure, analyse, classify, and report such information is reliable.

- Resources and assets are acquired economically, used efficiently and sustainably, and protected adequately.

Fraud and Corruption

The County Council is one of the largest business organisations in Oxfordshire. In administering its responsibilities, the Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor. The Council is committed to an effective Anti-Fraud and Corruption culture, Internal Audit fully considers the risk of fraud and corruption when undertaking its activities by promoting high ethical standards and encouraging the prevention and detection of fraudulent activities.

The Council's Anti-Fraud and Corruption Strategy, sets out responsibilities in this area. Internal Audit – Counter Fraud Team within Oxfordshire County Council is responsible for developing and implementing the Anti-Fraud and Corruption Strategy and monitoring the investigation of any reported issues. To ensure that all suspected or reported irregularities are dealt with promptly and in accordance with this strategy and that action is identified to improve controls and reduce the risk of recurrence. Internal Audit - Counter Fraud Team maintains the fraud log for Oxfordshire County Council. Internal Audit – Counter Fraud Team undertakes investigations into potential financial irregularities. In some circumstances this may be delegated to the service itself following an assessment of risk and financial impact.

Internal Audit – Counter Fraud Team also facilitates Oxfordshire County Council's participation in the National Fraud Initiative (NFI) in which data from the Council's main systems are matched with data supplied from other Local Authorities and external agencies to detect potentially fraudulent activity.

Approved by:

Sarah Cox, Chief Internal Auditor

Lorna Baxter, Executive Director of Resources (& S151 Officer)

April 2025.

Approved by the Audit & Governance Committee at its meeting on 4 June 2025.

Councillor Roz Smith, Chair of the Audit & Governance Committee

Date of next review: July 2026

ANNEX 2



Oxfordshire County Council Internal Audit - Quality Assurance and Improvement Programme

Introduction

Internal Audit's Quality Assurance and Improvement Program (QAIP) is designed to provide reasonable assurance to the various stakeholders of Oxfordshire County Council Internal Audit Service that Internal Audit:

- Performs its work in accordance with its Charter, which is consistent with the Global Internal Audit Standards in the UK Public Sector.
- Operates in an efficient and effective manner.
- Is adding value and continually improving the service it provides.
- The Chief Internal Auditor is ultimately responsible for maintaining the QAIP, which covers all types of Internal Audit activities. The QAIP must include both internal and external assessments. Internal assessments are both ongoing and periodical and external assessments must be undertaken at least once every five years.

Internal Assessments

Internal Assessment is made up of both ongoing reviews and periodic reviews.

Ongoing Reviews

Ongoing assessments of quality are conducted through:

- Supervision of audit engagements
- Regular, documented review of working papers during engagements by appropriate Internal Audit staff
- Applying relevant audit policies and procedures, including those set out in the Oxfordshire County Council Internal Audit Manual, to ensure applicable audit planning, fieldwork and reporting quality standards are met
- Review of all audit reports and agreed management actions by the Chief Internal Auditor prior to formal circulation.
- Feedback from Customer Satisfaction Questionnaires (CSQs) on individual audit assignments

- Established key performance indicators (KPIs) designed to improve Internal Audit's effectiveness and efficiency. These are signed off each year by the Audit & Governance Committee.
- In assigning audit work to an individual auditor consideration is given to their level of skills, experience and competence and an appropriate level of supervision exercised
- Feedback from CSQs, performance against KPIs and reviews of working papers and audit reports will form part of the discussion during regular meetings / 12:3:2 appraisal/121 discussions.

Periodic Reviews

Periodic assessments are designed to assess conformance with Internal Audit's Charter and the Global Internal Audit Standards in the UK Public Sector and review the efficiency and effectiveness of internal audit in meeting the needs of its various stakeholders. Periodic assessments will be conducted through:

- Chief Internal Auditor / Audit Manager file reviews to ensure performance in accordance with Internal Audit's Quality Procedures Manual.
- Review of internal audit Key Performance Indicators by the Chief Internal Auditor on a monthly basis, including elapsed time between start of audit and exit meeting, elapsed time between exit meeting and issue of draft report, elapsed time between receipt of management responses to draft report and issue of final report, % of planned activity completed and % of management actions implemented.
- Quarterly activity and performance reporting to the Audit and Governance Committee and Section 151 officer.
- Annual self-review of conformance with the Global Internal Audit Standards. Any resultant action plans will be monitored by the Chief Internal Auditor on a quarterly basis.
- Independent review (every 2 -3 years) of the effectiveness of Internal Audit by the Council's Monitoring Officer, with results reported to and reviewed by the Audit and Governance Committee.

External Assessment

External assessments will appraise and express an opinion about Internal Audit's conformance with the Global Internal Audit Standards in the UK Public Sector and include recommendations for improvement, as appropriate.

An external assessment will be conducted every 5 years by a qualified, independent assessor from outside the Council. The assessment will be in the form of a full external assessment, or a self-assessment with independent external validation. The format of the external assessment will be discussed with the Audit & Governance Committee.

Reporting

Internal Assessments – Quarterly activity and performance reporting to the Audit and Governance Committee and Section 151 officer.

External Assessments – results of external assessments will be reported to the Audit & Governance Committee and Section 151 officer at the earliest opportunity following receipt of the external assessor's report. The external assessment report will be accompanied by a written action plan in response to significant findings and recommendations contained in the report.

Follow Up - the Chief Internal Auditor will implement appropriate follow-up actions to ensure that action plans developed are implemented in a reasonable timeframe.

Opportunities for improvement – 2025/26

Opportunity for improvement	Lead Officer/s	Target Date
<p>Internal Audit Standards – Ongoing review of working practices throughout 2025/25 to ensure full conformance with the new Global Internal Audit Standards in the UK Public Sector.</p> <p>This will include updating the Internal Audit Manual and Internal Audit Charter.</p> <p>A self-assessment against the new standards will be completed during 2025/26.</p>	<p>Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager / Georgina Queripel, Audit Manager</p>	<p>Internal Audit Charter Update – already complete.</p> <p>Internal Audit Manual Update – by end of September 2025.</p> <p>Self-Assessment undertaken – by end of December 2025.</p>
<p>Data analytics - to continue to embed into the Internal Audit and Counter Fraud assurance activities.</p> <p>This needs to be a continued focus, building awareness and application across the team. Members of the team will undertake further training.</p>	<p>Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager / Georgina Queripel, Audit Manager / Declan Brolly, Counter Fraud Manager</p>	<p>Improvements to assurance activities continue to be embedded throughout 2025/26.</p>
<p>Root Cause Analysis / Reporting themes – as part of the implementation of the new GIAS, internal audit working practices will be reviewed to</p>	<p>Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager /</p>	<p>Improvements to be embedded throughout 2025/26.</p>

<p>ensure root cause analysis is completed and properly documented for each audit assignment. This will require further training for the team.</p> <p>We will review and look to improve how we communicate the root cause.</p> <p>We will review how we communicate themes from multiple engagements including common root causes and significant risk exposures.</p>	Georgina Queripel, Audit Manager	
<p>Professional scepticism and professional courage – the new GIAS have expanded “ethics and professionalism” to include new sections and expectations for internal auditors in demonstrating professional courage and professional scepticism. Training in these areas will be provided to the team.</p>	Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager / Georgina Queripel, Audit Manager	End of September 2025.
<p>Data Protection – we will review arrangements for internal audit and counter fraud compliance, including electronic document retention and data sharing arrangements.</p>	Sarah Cox, Chief Internal Auditor / Katherine Kitashima, Audit Manager / Georgina Queripel, Audit Manager / Declan Brolly, Counter Fraud Manager	End of September 2025.

Signed by:

Sarah Cox, Chief Internal Auditor

Lorna Baxter, Executive Director of Resources and S151 Officer.

Date approved: April 2025

Date of next review: July 2026