Governance, Risk and Best Value Committee

10:00am, Tuesday, 23 March 2021

Internal Audit Annual Plan 2021-22

Item number Executive/routine Wards

1.

Executive

Recommendations

Council Commitments

1.1 The Governance, Risk and Best Value Committee is recommended to review and approve 2021/22 Internal Audit plan and supporting risk assessment.

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Report

Internal Audit Annual Plan 2021-22

2. Executive Summary

2.1 The purpose of this paper is to present the draft Internal Audit (IA) plan and supporting IA risk assessment for the period 1 April 2021 to 31 March 2022 (the 2021/22 plan) to the Committee for approval.

Plan Assumptions

- 2.2 Recognising the ongoing Covid-19 resilience challenges that continue to impact the Council and the need to ensure that the risks associated with open IA findings are effectively addressed by Directorates and Divisions, assurance coverage in the 2021/22 annual plan has been maintained at the same reduced level as the prior year annual plan.
- 2.3 It is expected that this approach will enable the Council to focus on their ongoing Covid-19 resilience activities; re-establishing services post-Covid; closure of open IA findings; and implementation of refreshed first line governance and assurance arrangements in line with the commitment made by the Chief Executive to the Committee.
- 2.4 The risk associated with adopting this approach is a reduced level of assurance on the effectiveness of 'business as usual' operational service delivery controls that may have been impacted as a result of focusing on Covid-19 resilience activities.
- 2.5 This assurance risk is mitigated to an extent by the inclusion of a validation audit that will confirm whether actions implemented to address previously closed IA findings have been effectively implemented and sustained; and an increased number of follow-up days in response to the Council's increased focus on timely closure of current IA findings and implementation of actions to address overdue findings.
- 2.6 It is not proposed that reliance will be placed on assurance carried out by first or second lines of defence as there is currently no clearly established assurance framework model upon which IA can properly rely to support the 2021/22 Internal Audit Annual Opinion, and Local Area Network members have confirmed that they are reducing their assurance in response to the impacts of Covid-19.

- 2.7 Another impact of the reduced IA assurance coverage proposed for 2021/22 and delivered in the prior two plan years combined with IA time allocated to follow-up, is that IA cannot provide assurance across all areas of the Council on a rolling 3-year basis. Consequently, it is proposed that the current audit coverage requirement is extended from 3 to 5 years, and reassessed when a risk-based follow-up approach is implemented.
- 2.8 The methodology applied to the risk and control effectiveness assessments supporting the IA annual plan has been revised to align with the Council's refreshed operational risk management framework and the methodology supporting preparation of the annual opinion.
- 2.9 Whilst the PSIAS requires completion of an annual risk assessment, and determination of appropriate ongoing assurance coverage across the organisation, it does not specify the methodology to be applied to in these areas. Consequently, the changes proposed above will not result in non-conformance with PSIAS requirements.
- 2.10 Further detail on the refreshed original risk; control assessment; and audit requirement methodologies is included in the 2021/22 IA annual plan. at Appendices 1 and 2.

Plan Summary

- 2.11 The draft 2021/22 annual plan includes a total of 46, with 36 audits (including follow-up days) to be delivered across the Council, which is aligned with 2020/21 IA plan coverage.
- 2.12 The number of follow-up days included in the plan has been increased to 625 days support Directorates and Divisions with closure of open IA findings.
- 2.13 The IA resourcing model has confirmed that IA is currently adequately resourced to support delivery of the proposed plan.
- 2.14 It is IA's opinion that the plan is appropriately structured to cover the Council's most significant strategic; operational; and Covid-19 risks.

3. Background

Plan Preparation Process

- 3.1 The IA plan is driven by Public Sector Internal Audit Standards (PSIAS) requirements; the Council's organisational objectives and priorities; and an assessment of the risks that could prevent the Council from meeting those objectives and providing services to citizens.
- 3.2 The approach applied in developing the plan considered the outcomes of work performed by across the Council by other second and third lines of defence assurance providers, and the extent to which reliance can be placed upon them.

- 3.3 The Audit Scotland Code of Audit Practice 2016 and PSIAS requirements have also been considered and a coordinated and integrated approach with Azets (the Council's External Auditors) and members of the Council's Local Area Network (LAN) has been applied in developing the plan.
- 3.4 The risk assessment performed by IA that supports development of the annual plan and drives the frequency of coverage across service areas is based upon a review of the Council's current risk registers; ongoing IA attendance at quarterly Corporate Leadership Team (CLT) and Directorate Risk Committee meetings; knowledge of new projects and initiatives undertaken by the Council; consideration of prior year Internal Audit findings; and consideration of the current open and overdue Internal Audit findings position.
- 3.5 Adequacy and capability of Internal Audit resources has also been reviewed in line with PSIAS requirements to confirm whether sufficient resources, skills and capability are available to support delivery of the plan.

Prior Year Coverage

- 3.6 Analysis was performed in September 2019 that compared audit coverage in Edinburgh with the 22 Scottish Local Authorities who publish their annual IA plans. Calculation of the number of days IA coverage as a percentage of £m revenue confirmed that 16 of the 22 authorities had higher levels of IA coverage per £m of income in comparison to Edinburgh. This analysis confirmed that Edinburgh audit coverage in 2019/20 was not excessive in comparison to other Scottish authorities.
- 3.7 The 2019/20 IA annual plan included a total of 51 audits; with 42 to be delivered across the Council and 9 for arms-length and external organisations.
- 3.8 In response to the Covid-19 pandemic, IA paused their assurance activities and, in June 2020, the Committee approved the delay and carry forward of 13 audits from 2019/20 into the following plan year, with a total of 31 completed audits (including progress with two ongoing agile project audits) forming the basis of the 2019/20 IA annual opinion for the Council.
- 3.9 Recognising the ongoing Covid-19 challenges faced by the Council, the 2020/21 IA annual plan approved in September 2020 included 37 audits to be delivered across the Council.

Internal Audit Follow-Up

3.10 The IA follow-up process is designed to confirm that findings raised in previous audits have been effectively implemented. IA does not currently apply a 'risk-based' follow-up approach based on the need to further improve risk and control awareness and embed the risk and control culture across the Council.

Consequently, all IA findings raised in audit reports regardless of their ratings are reviewed by IA to confirm that that the agreed management actions have been effectively implemented and sustained. This approach will be reviewed annually.

4. Main report

Plan Content

- 4.1 The draft 2020/21 annual plan includes a total of 46 audits (including follow-up days, with 36 audits to be delivered across the Council, which is aligned with 2020/21 IA plan coverage.
- 4.2 The draft plan currently includes 2 low risk audits requested annually by the Department for Transport and the Scottish Government. Both organisations have been contacted to request deferral of these audits for a further year. If this is agreed, the number of audits to be delivered across the Council will reduce to 34.
- 4.3 As in previous years, 10 audits will be delivered for arm's length and external organisations: 4 for the Lothian Pension Fund, and the remaining 6 for the Lothian Valuation Joint Board (1); SEStran (1); the Edinburgh Royal Military Tattoo (1) and the Edinburgh Integration Joint Board (3).
- 4.4 The plan includes 7 Council-wide and cross Divisional reviews that have been included to provide assurance on the key controls established to manage the most significant risks associated with services and processes that span across the Council.

Follow-up

- 4.5 The number of follow-up days included in the plan has been increased from 500 days for 2020/21 (the equivalent of circa 20 completed audits) to 625 days (the equivalent of circa 25 completed audits) to support directorates and divisions with closure of open IA findings. This allocation of available assurance days to follow-up activity also reflects that IA does not currently apply a 'risk based' follow up approach.
- 4.6 Reliance will be placed on IA follow-up work to provide assurance across the risks managed by the following Divisions, where assurance is required (based on IA audit coverage model outcomes) and no specific audit coverage is planned:
 - Safer and Stronger Communities Homelessness and Housing Support;
 - Place Management Waste and Cleansing; and,
 - Place Management Roads and Transport Infrastructure.
- 4.7 It is important to note that if agreed management actions associated with open IA findings are not implemented on time, and/or implementation dates extended, then only limited assurance will be obtained from the ongoing follow-up process, which could potentially affect the ability of the Chief Internal Auditor to provide an annual assurance opinion for 2021/22.

IA Capacity

- 4.8 The IA resourcing model has confirmed that IA is currently adequately resourced to support deliver of the proposed plan.
- 4.9 The resourcing model allows for potential sickness absence, and reserves time (circa 30% of available days) to support team training and personal development; performance and operational management activities; ongoing audit system enhancement; and governance and committee reporting activities.
- 4.10 Contingency time (circa 40 days) has been included in the proposed plan, and is also included in the time reserved to support the administrative activities performed by the IA team.
- 4.11 If permission is received to defer the two low risk audits requested annually by the Department for Transport and the Scottish Government outlined above, contingency time will increase to circa 80 days, which is the equivalent of approximately 3 audits.

Assurance Coverage

- 4.12 It is IA's opinion that the plan is appropriately designed to cover the Council's most significant strategic; operational; and Covid-19 risks, which have been mapped to the individual audits included in the draft plan.
- 4.13 IA's assessment of original service delivery risks and recent IA coverage across the Council identified a total of 11 areas where no recent assurance has been provided, and no new audit coverage is included in the proposed plan. Further detail is included at section 3.3.2 of the proposed IA annual plan included at Appendix 1.
- 4.14 Some of these areas have been included in the reserve list of audits supporting the plan. Further detail on the use of the reserve list is included below.

IA Quality Assurance and Training

- 4.15 The plan also includes time for the IA team to complete an internal quality (IQA) assessment as per PSIAS requirements, and time to support completion of the external quality assessment (EQA) during 2021/22 to comply with the five-year EQA cycle requirement specified in the standards.
- 4.16 Time has also been included (5 days) for delivery of one half day of training per quarter that will be open to all employees; and IA attendance at, and involvement in, new start and senior management induction training.

Partnership Working

4.17 The draft plan has been discussed with Azets (the Council's currently appointed external auditors); Audit Scotland; and other Local Area Network (LAN members) in line with the requirements of the Audit Scotland Code of Audit Practice 2016 (section 33) that requires external auditors to coordinate their work with IA; Audit Scotland; other external auditors; and relevant scrutiny bodies to secure value for

- money by removing unnecessary duplication and provide a clear programme of scrutiny activity for audited bodies.
- 4.18 A co-ordinated and integrated approach with Azets will be adopted in relation to the ongoing audit of two major projects where IA and Azets will work together to deliver assurance. Azets has identified a further 5 audits where they will endeavour to take account of the work performed by IA to support their 2020/21 financial statements review.
- 4.19 Further detail on the coordinated and integrated approach with External Audit; Audit Scotland; and Local Area Network members is included at section 3.3.3 of the proposed IA annual plan included at Appendix 1.

Ongoing co-source support

- 4.20 Support will be required to deliver 10 specialist audits covering Digital Services; Health and Safety; and the Lothian Pension Fund. This will leave a balance of 36 audits (including follow-up) to be delivered by the Council's Internal Audit team.
- 4.21 The current co-source arrangement with PwC will conclude on 31 March 2021, and procurement is currently underway to establish new co-source arrangements in advance of the 2021/22 plan year.

Reserve List

4.22 Recognising the need to potentially revise the IA plan to reflect the Council's changing risk profile and organisational changes, a 'reserve list' of audits has also been prepared that have not been included in the plan. Where any planned audits cannot be completed (for example, where a decision has been taken that a major project will not now progress), the risks associated with the areas included on the reserve list will be considered and an alternative audit selected.

Reliance on other assurance providers

4.23 Whilst assurance work performed by other second and third line assurance providers have been considered as part of the risk assessment processes, Internal Audit will not place reliance upon these other sources of assurance to support the 2018/19 annual Internal Audit Opinion.

5. Next Steps

5.1 Once approved by the GRBV Committee, the IA plan will be shared with the Corporate Leadership Team, Heads of Service and Senior Service Managers, with reviews commencing from 1 April 2021.

6. Financial impact

6.1 There is no direct financial impact arising from this report.

7. Stakeholder/Community Impact

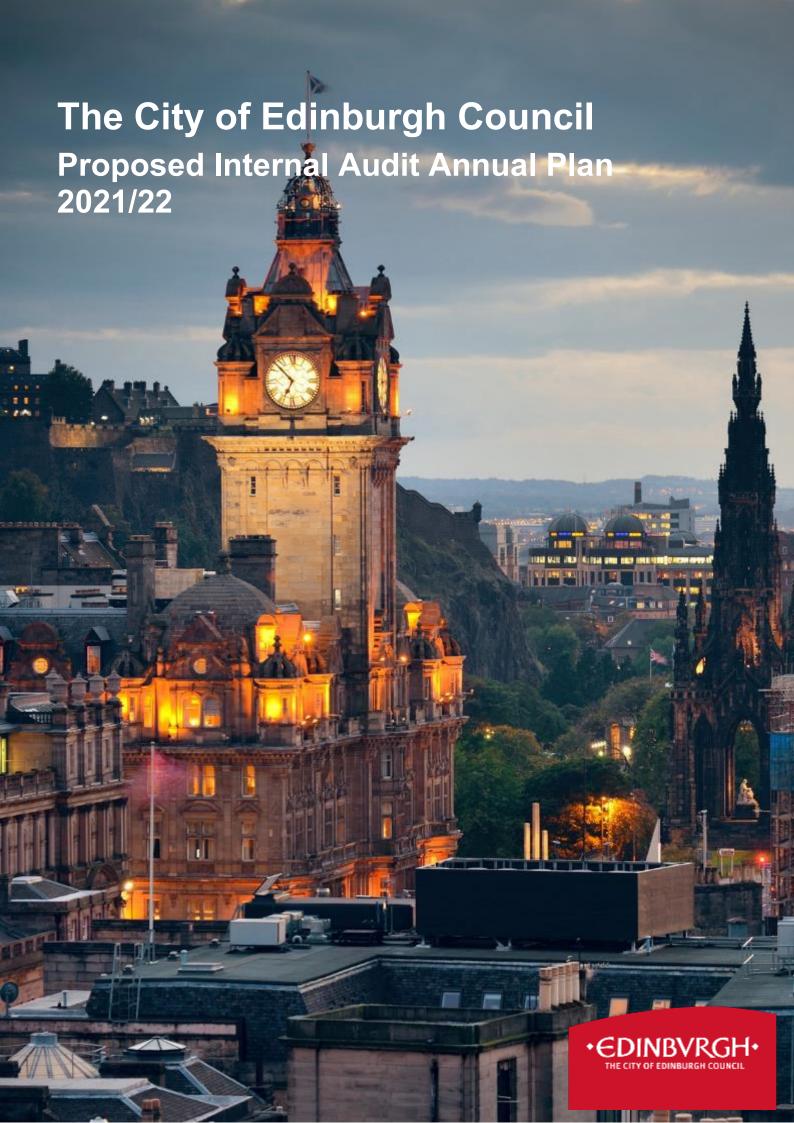
7.1 The Corporate Leadership Team; Senior Management; Trade Union colleagues; political groups; elected members of the Governance, Risk and Best Value Committee; and members of the Council's Local Area Network have been consulted and engaged when developing the plan.

8. Background reading/external references

- 8.1 Public Sector Internal Audit Standards
- 8.2 Process for approving changes to the Internal Audit plan

9. Appendices

9.1 Appendix 1 – Internal Audit annual plan 2021-22



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1. Introduction and Approach

1.1 Introduction

This document sets out the scope of the Internal Audit (IA) 2021/22 annual plan that will be delivered during the 2021/22 financial year, with the objective of the delivering independent assurance on the key controls established across the Council to mitigate its most significant risks.

1.2 Approach

A summary of the approach applied when assessing the Council's key risks and preparing the annual plan is set out below in Figure 1. The IA plan is driven by the requirements of Public Sector Internal Audit Standards (PSIAS); the Council's organisational objectives and priorities; and an assessment of the risks that could prevent the Council from meeting those objectives and providing services to citizens. A more detailed description of our risk assessment approach can be found at section 2 below and in Appendices 1 and 2.

Figure 1: Approach applied in developing the 2021/22 IA Annual Plan

Step 1 Review Public Sector Internal Audit (PSIAS) requirements

 Review PSIAS to confirm that there have been no changes in relation to annual planning requirements.

Step 2 Understand the Council's objectives and risks

 Obtain information about the external and internal risks that could impact the Council.

Step 3 Consider the Audit universe and other sources of

 Identify all auditable areas across the Council (these can be Service Areas, Council-wide processes, or locations) and consider other sources of assurance provided across the three lines model.

Step 4 Assess the inherent risk

 Assess the inherent (pre-controls) risks associated with each auditable area based on the likelihood that the risk will crystallise and its potential impact.

Step 5 Assess the strength of the control environment

 Assess the strength of the control environment within each auditable area (considering assurance outcomes across the three lines of defence) to identify those areas with a high reliance on key operational or manual controls.

Step 6 Calculate the audit frequency requirement rating

 Calculate the audit frequency requirement rating considering the inherent risk assessment and the strength of the control environment for each auditable area.

Step 7 Determine the audit plan

 Based on the outcomes of steps 4, 5 and 6, determine the timing and scope of audit work required.

Step 8 Other considerations

 Consider any requirements in addition to those identified from the risk assessment process.

1.3 Public Sector Internal Audit Standards Requirements – Step 1

The IA plan has been developed based on the requirements of the Public Sector Internal Audit Standards (PSIAS) originally published in April 2013 and last refreshed in April 2017, which specify that:

- the Chief Internal Auditor (CIA) must develop a risk based plan that is consistent with the organisation's goals, and determines the priority of IA activity;
- the plan must be based on a documented risk assessment, undertaken at least annually, with input from senior management and the board (the Corporate Leadership Team);
- the CIA must consult with senior management and the Corporate Leadership Team (CLT) to obtain an
 understanding of the organisation's strategies, key business objectives, and associated risks and risk
 management processes;
- the plan must consider the requirement to produce an annual Internal Audit opinion;
- the plan must incorporate or be linked to a strategic or high-level statement of how Internal Audit
 assurance will be delivered and developed in accordance with the Internal Audit charter and how it links
 to organisational objectives and priorities;
- the CIA must communicate the Internal Audit plan and resource requirements, including significant interim changes, to senior management and the CLT for review and approval;
- the CIA must ensure that Internal Audit resources are appropriate, sufficient; and effectively deployed to achieve the approved plan;
- the plan must explain how internal audit's resource requirements have been assessed. Where the CIA
 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 CLT; and
- the CIA must review and adjust the plan, as necessary, in response to changes in the organisation's business, risks, operations, programmes, systems, and controls.

1.4 Understand the Council's Objectives and Risks – Step 2

The annual IA plan is based on an annual assessment performed by IA of the key risks across the Council's Directorates; Divisions; and Services (the audit universe). The outcomes of the risk assessment process are included at Section 2.

The risk assessment process normally involves attendance at relevant risk committees and governance meetings; combined with stakeholder engagement across the Council to understand perspectives on the Council's objectives and new and emerging risks; engagement with Elected Members; and Local Area Network Members (including the Care Inspectorate; Education Scotland; and the Housing Regulatory Authority).

During the Covid-19 pandemic, reliance has also been placed on review of the documents detailed below combined with attendance at the twice weekly Corporate Incident Management Team (CIMT) and fortnightly Council wide Risk Forum meetings to identify the key risks and challenges currently facing the Council:

Review of the following documents was also performed:

- the Covid-19 risk management plan
- the Council's current Corporate Leadership Team risk register:
- projects and initiatives currently included in the Council's major projects portfolio;
- the Council's financial and performance management information;

- the outcomes of any assurance reviews performed by LAN members;
- progress with implementation of agreed management actions to support closure of open and overdue Internal Audit findings.

Further details on the risk based approach and methodology applied are included at Appendices 1 and 2.

1.5 The Audit Universe and other assurance providers – Step 3

The Council's audit universe is essentially its entire organisational structure. For completion of the risk assessment and development of the annual plan, the structure has been divided into the elements of the central support services within the Council's established Directorates and Divisions.

1.5.1 Corporate Risk Management

As the CIA is also responsible for the Council's Corporate Risk Management team, the IA Principal Audit Managers (PAMs) have independently considered whether a risk management audit should be included in the 2021/22 annual plan, and have concluded that this is not required.

This conclusion is based on the recent (June 2020) Risk Management Audit completed by Scott Moncrieff (now Azets) and the ongoing independent assurance that will be provided in 2021/22 by Azets to validate that agreed actions to address the 2 High and 3 Medium rated IA findings raised have been effectively implemented and sustained.

Progress with implementation of any open Risk Management findings is also monitored through the established IA process and reported monthly to the Corporate Leadership Team and quarterly to the Governance, Risk and Best Value Committee.

1.5.2 Adaptation and Renewal Programme and Major Project Assurance

The Strategic Change and Delivery team within the Strategy and Communications Division has developed and implemented a new approach to the management of change delivered by projects included in the Council's Major Projects Portfolio to ensure effective oversight of the Portfolio and application of a consistent project management approach across all significant projects.

This approach was refreshed to support implementation of the Adaptation and Renewal Programme (the A&R Programme) that was established In May 2020 to support the Council's recovery from the Covid-19 pandemic and the future adaptation and renewal of both Council services and the city.

The Programme includes five interlinked workstreams, and the projects included in the Major Projects Portfolio have been mapped across into relevant workstreams and will now be delivered through the Programme.

An initial review of A&R Programme governance was included in the 2020/21 IA annual plan, and a further agile review has been included in the proposed 2021/22 annual plan to assess the design of key A&R Programme deliverable prior to implementation. IA will also continue with the ongoing agile reviews of the Tram to Newhaven and Enterprise Resourcing Planning projects during 2021/22.

These projects have not been included as auditable areas for the purposes of the risk assessment supporting the plan as delivery responsibilities are allocated across all Council directorates.

1.5.3 Localities Model

Both the Edinburgh Health and Social Care Partnership / Integration Joint Board and the Council's Place Directorate currently operate locality models, where services provided by the Council are grouped and managed under four geographic localities (North East; North West; South East; and South West) that are

common to both the Council and other public and third sector organisations across Edinburgh. Localities are also supported by the 12 existing Neighbourhood Partnerships.

Whilst Localities have not been identified as distinct auditable areas within the plan, audit work performed will cover how Council services are provided across the four Localities and will consider the potentially different risk profiles across the Localities.

1.5.4 Centre visits

Whilst no specific centre based reviews (for example depots; libraries; and cultural venues) have been included in the 2021/22 plan, the Council Wide audits of Fraud and Serious Organised Crime; Managing aggressive and Violent Behaviour; Social Distancing and Employee Protection are likely to focus on some Council centres and schools. Given the current restrictions in place in response to Covid-19, these audits will be performed remotely.

1.5.5 Lothian Pension Fund

The Council's IA team also provides audit services to the Lothian Pension Fund. This comprises three or four audits each year and a total of circa 75 - 100 audit days. These outcomes of these audits will be reported to the Pensions Audit Sub-Committee and Pensions Committee and will not be subject to scrutiny by GRBV.

1.5.6 Edinburgh Integration Joint Board

Audit services are also provided by the Council's IA team to the Edinburgh Integration Joint Board (EIJB) This comprises three audits each year and a total of 75 audit days. These audits are performed for the EIJB and will not be subject to scrutiny by GRBV. However, it is expected that the EIJB Audit and Assurance Committee would refer any relevant internal audit reports to GRBV under the existing reciprocal referral arrangements.

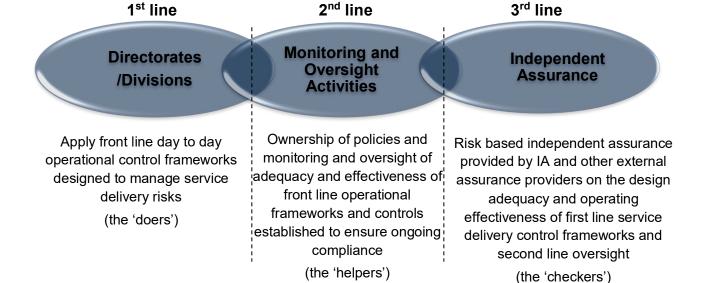
1.5.7 Other Organisations

Assurance is also provided by the Council's IA team to three external arm's length organisations (the Lothian Valuation Joint Board; the Royal Edinburgh Military Tattoo; and the South East of Scotland Transport Partnership (SEStran)). This involves one audit for each organisation and a total of 75 audit days.

1.5.8 The Three Lines Model

The approach applied in developing the plan also considers Internal Audit's role as one of the Council's 3rd line independent assurance providers. The diagram below outlies the three lines assurance model.

Figure 2: The Three Lines Model



It should be noted that some second line teams (for example Human Resources and Finance) may also have responsibility for ongoing first line service delivery in addition to owning the policies and frameworks that should be applied by all first line service delivery teams.

1.5.9 Other sources of assurance – 2nd and 3rd Lines

In developing the IA risk assessment and plan we have considered other sources of assurance provided to the Council across the second and third lines of defence and have assessed the extent to which reliance can be placed upon them. These include:

- **Second Line** Risk Management; Corporate Health and Safety; Information Governance; Resilience; Strategic Change and Delivery; Procurement (including Contracts and Grant Management); Human Resources; Finance; and Quality, Governance, and Regulation.
- **Third Line** Local Area Network members which include the Care Inspectorate; Education Scotland; the Housing Regulator; Audit Scotland and external audit (Azets);
- **Third Line** Other regulatory authorities who may perform reviews (for example, the Health and Safety Executive; the Scottish Government; and the Information Commissioner's Office).

IA does not place reliance upon these other sources of assurance to support the annual opinion. However, the outcomes of reviews performed by the second and third lines were considered when assessing the strength of the control environment for each auditable area as part of the risk assessment process.

1.5.10 Coordinated and Integrated approach with External Audit

The Audit Scotland Code of Audit Practice 2016 notes (at section 33) that it is important that external auditors coordinate their work with IA; Audit Scotland; other external auditors; and relevant scrutiny bodies to recognise the increasing integration of service delivery and partnership working within the public sector as this helps secure value for money by removing unnecessary duplication and provides a clear programme of scrutiny activity for audited bodies.

The PSIAS also notes that when preparing the annual plan, the CIA should share information, coordinate activities, and consider relying upon the work of other internal and external assurance and consulting service providers to ensure proper coverage and minimise duplication of effort.

To support this objective, IA and external audit have worked together to identify areas of planned assurance where a coordinated and integrated approach will be applied, with internal and external audit (Azets) either working in partnership to deliver assurance or external audit taking account of IA reviews. Further details of the specific reviews are included at section 3.5.3 below.

1.5.11 Coordinated and Integrated approach with Local Area Network (LAN) Members

Discussions with Audit Scotland and external audit has confirmed in relation to the LAN (refer 1.5.8 above for details) that Local Scrutiny Plans detailing planned LAN scrutiny activity across the Council (based on a shared risk assessment undertaken by LAN members) will no longer be prepared.

IA has engaged with individual LAN members to confirm that there is no obvious duplication between the 2021/22 IA annual plan and any planned LAN scrutiny reviews.

2. Risk assessment – Steps 4 to 6

2.1 Risk assessment Approach and Methodology

In developing the annual plan, we have considered the PSIAS requirement to produce an annual Internal Audit Opinion by determining the IA coverage required to provide assurance over the Council's audit universe and most significant risks.

Original Risk and Control Effectiveness Assessment

Each of the original (pre-controls) risks associated with Council services has been assessed based on the impact and likelihood that that they will crystallise, and the strength of the current control environment; and the outcomes of reviews performed by other second and third line assurance providers.

The original risk and control effectiveness assessment methodology has been refreshed for the 2021/22 annual plan to better align with the Council's refreshed operational risk management framework and control effectiveness assessments currently applied to individual IA reports and the annual opinion.

Audit Coverage Requirement

Review of prior year annual plans also confirmed that it is not currently possible to ensure coverage of all Council areas at least once every three-years.

This is due to the allocation of 625 audit days to follow-up activity (the equivalent of circa 25 audits) as a risk based follow up approach is not currently applied, reflecting the need for improved risk and control awareness and an embedded risk and control culture across the Council. The potential to implement a risk based follow up approach continues to be reconsidered annually.

Whilst the number of follow-up days required will always vary in line with the volume and significance of IA findings raised, it is expected that adopting a risk based approach would significantly reduce the follow-up time required, enabling IA to focus on other areas of the Council that have not recently been covered.

Consequently, the three year audit coverage requirement has been reconsidered and refreshed to cover all areas at least once every five years, with focus on highest risk areas and follow-up of all agreed management actions prior to closure. A refreshed audit coverage methodology to calculate the frequency of audits for each area has also been introduced.

Further detail on these refreshed original risk; control assessment; and audit requirement methodologies is included at Appendices 1 and 2.

The impact of Covid-19 on the Council's Risk Profile

The Council's existing risk profile has changed significantly since March 2020 due to the impact of the Covid-19 pandemic, and details of the nine new strategic Covid-19 risks impacting the Council are recorded in the Covid-19 Risk Management Plan (RMP).

The IA risk assessment has been mapped to the 11 strategic risks included in the CLT risk register that was presented to the GRBV in December 2020 and the nine current Covid-19 RMP risks.

2.2 Risk assessment Outcomes

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Resources	ı		1	ı	ı			
Customer and Digital Services								Original Risk Assessment - the critical rating reflects the significance of technology in supporting delivery of services, and the significance and criticality of the established CGI partnership arrangements supporting delivery of the Council's technology operations.
Digital Services • Enterprise								Relevant CLT Risks - reflected in the Service Delivery; Technology and Information; and Supplier, Contractor, and Partnership Management CLT risks which have high and critical original risk assessments.
Architecture and ICT Security Change				Y	Y	Y	Y	Covid-19 impact – increased dependency on the Council's network security and technology resilience arrangements to support both remote and new ways of working (for example, use of personal devices).
ManagementCommercialCommercial			2	Ť	r	Ť	Ť	These impacts are covered by the strategic Technology and Information risk included in the Covid-19 RMP.
Systems Development								Control Effectiveness Assessment – 'some improvement required' rating reflects recent assurance outcomes and progress with implementation of IA findings.
Services and System Support								2021/22 coverage - Further coverage is included in the 2021/22 IA annual plan to utilise the two free CGI contractual audits, combined with ongoing IA validation of open assurance findings. External audit (Azets) will also provide assurance on key financial systems technology controls.
Customer and Digital Services	•	•	1	Y	Y	Y	Y	Original Risk Assessment – the critical rating reflects that Customer Services is the key point of contact for citizens requesting services; highlighting emergencies; or making

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Customer ServicesCustomer Care								complaints, and is also responsible for generating a significant proportion of the Council's revenue (Council Tax and Business Rates)
 and Complaints Contact Centres Revenue and 								Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; and Financial and Budget Management CLT risks which have high and critical original risk assessments.
ApplicationsCitizens AccountIntelligent Automation								Covid-19 impact – increased dependency on Customer Services for shielding and vulnerable customers; and implementation of Covid-19 grant award processes. This involved immediate implementation of a range of new processes and systems, for example tailoring the Verint customer engagement system to support shielding and vulnerable
								customer arrangements. Additionally, the majority of customer services teams transitioned to work from home.
								These impacts are covered by the Technology and Information and Health and Safety of Citizens and Service Users strategic risks included in the Covid-19 RMP.
								Control Effectiveness Assessment – 'significant improvement required' rating reflects the outcomes of recent audits across Customer Services.
								2021/22 coverage - Use of the Verint CRM System to Support Recording and Remediation of Citizen Complaints and Queries
Customer and Digital Services		NI/A	TDO	N	N.I	N	V	Original Risk Assessment – the medium rating reflects the service delivery support provided across the Council (for example provision of executive assistants and business support in schools) based on service levels agreed with divisions.
Business Support		N/A	TBC	N	N	N	Y	The control effectiveness rating has been increased from 2 to 3 reflecting the outcomes of IA reviews performed in 2019/20 and progress with implementation of agreed management actions.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Relevant CLT Risks - reflected in the Service Delivery CLT risk which has a high original risk assessment. Covid-19 impact – the majority of business support teams transitioned to working from home, whilst providing ongoing support for services where possible. Control Effectiveness Assessment – has not been assessed as no assurance work has been performed in business support since 2017/18 (Care Homes). 2021/22 coverage – as Business Support has been assessed as medium risk, no IA assurance is planned for 2021/22.
Legal and Risk Corporate Health and Safety	•		2	N	Y	Y	N	Original Risk Assessment - critical risk assessment reflects the policy and framework management and assurance responsibilities of the Corporate Health and Safety Team. Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – significant impact on the Corporate Health and Safety team who supported establishment of centralised Personal Protective Equipment (PPE) procurement and allocation process; established revised RIDDOR (Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations) reporting requirements; has developed and implemented of guidance and risk assessments; is supporting an internal advice helpline; and is involved in assessing the risks associated with service resumption and access requests. These impacts are included in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Control Effectiveness Assessment – 'some improvement required' reflects recent assurance outcomes for the Corporate Health and Safety Team and their role in implementation of asbestos recommendations from an external assurance review. 2021/22 coverage – Whilst no specific coverage is planned for 2021/22, assurance will be provided through follow-up and may be provided through Council wide thematic reviews.
Legal and Risk Corporate Risk Management	•	•	2	N	N	Y	N	Original Risk Assessment – high risk assessment reflects the importance of an established and effective risk management framework that can be easily applied across diverse Council services. Relevant CLT Risks - reflected in the Service Delivery and Governance and Decision making CLT risks which have high original risk assessments. Covid-19 impact – design and implementation of the Council's risk management response. Control Effectiveness – 'significant improvement required' rating reflects the outcomes of the recent Risk Management audit. 2021/22 coverage - Audit assurance in 2021/22 will focus on follow up of any findings raised in the Risk Management audit.
Legal and Risk Legal Services	•	•	3	N	N	Y	Y	Original Risk Assessment – high risk assessment reflects the importance of provision of appropriate legal advice across the Council. Relevant CLT Risks - reflected in the Service Delivery; and Regulatory and Legislative Compliance CLT risks which have high original risk assessments. Covid-19 impact – no significant Covid-19 impacts

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Control Effectiveness – 'effective' rating reflects the outcomes recent audits that included legal services provided to divisions and directorates.
								2021/22 coverage – there is no planned coverage of Legal Services in the 2021/22 annual plan, however some assurance may be provided through Council wide thematic reviews
								Original Risk Assessment – critical risk assessment reflects the value and manual complexity of the Council's payrolls; and the importance of appropriate data protection for personal sensitive employee data. Relevant CLT Risks - reflected in the Financial and Budget Management; Service
		•	3	Y	Y	Y		Delivery; and Regulatory and Legislative Compliance CLT risks which have high and critical original risk assessments.
								Covid-19 impact – payrolls now being run remotely, and increased focus on employee wellbeing following implementation of working from home arrangements.
Human Resources and Payroll	•						Y	These impacts are reflected in the Health and availability of employees to deliver critical services strategic risk included in the Covid-19 RMP.
								Control Effectiveness – 'effective' rating reflects the outcomes recent assurance outcomes.
								2021/22 coverage - An Employee Lifecycle Data and Compensation and Benefits Processes audit has been included in the 2020/21 IA annual and will support external audit assurance provided by Azets in relation to payroll controls. Review of the design of the Council's response to the Scottish Local Government Living Wage requirements has also been included.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Finance Finance and Treasury Financial planning Budget setting and monitoring Support for strategic projects (financial modelling) Debt management Treasury management	•		2	Y	Y	Y	Y	Original Risk Assessment – critical risk assessment reflects the value of funds processed and managed by Finance; the complexities associated with their allocation across the Council; and the requirement to deliver a balanced budget. Relevant CLT Risks - reflected in the Financial and Budget Management; Service Delivery; and Regulatory and Legislative Compliance CLT risks which have high and critical original risk assessments. Covid-19 impact – significant impact on the Council's financial position given the increased costs associated with Covid-19, and lack of clarity as to whether these will be recovered; the impact of Arm's Length External Organisations on the Council's financial position (receipt of dividend income and future funding streams); and the challenges associated with delivering a balanced budget from financial year 23/24 onwards These impacts are reflected in the Financial and Economic strategic risk included in the Covid-19 RMP. Control Effectiveness – 'some improvement required' reflects recent assurance outcomes across Finance. 2021/22 coverage - Review of Capital Budget Setting and Management Processes, and ongoing agile reviews of the Tram to Newhaven and Enterprise Resource Planning projects.
Finance Commercial and Procurement Services	•	•	2	N	Y	Y	Y	Original Risk Assessment – critical risk assessment reflects the ned to comply with applicable procurement legislation and guidance; the value and scale of procurement across the Council; and the need to provide first line contract management guidance and support.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Procurement framework and support								Relevant CLT Risks - reflected in the Supplier, Contractor, and Partnership Management; Service Delivery; Financial and Budget Management; and Regulatory and Legislative Compliance CLT risks which have high and critical original risk assessments.
Contract planningContracts registerCloud based computing register								Covid-19 impact – significant impact on the Commercial and Procurement team who established the centralised personal protective equipment (PPE) procurement and allocation process; implemented new supplier relief processes; and are also supported the Council with Brexit preparations.
								These impacts are reflected in the strategic supply chain risk included in the Covid-19 RMP.
								Control Effectiveness – 'some improvement required' reflects recent assurance outcomes across Commercial and Procurement Services.
								2021/22 coverage - there is no planned coverage of Commercial and Procurement in the 2021/22 annual plan, however assurance will be provided through ongoing follow-up and may be provided through Council wide thematic reviews.
Finance								Original Risk Assessment - critical risk assessment reflects the significant value of funds managed (circa £8bn) and the extent of reliance on key third party system providers to support LPF operations.
Investment and Pensions (Lothian Pension Fund)	•		2	Y	Y	Υ	Υ	Relevant CLT Risks - reflected in the Service Delivery; Financial and Budget Management; and Regulatory and Legislative Compliance CLT risks which have high and critical original risk assessments.
								Covid-19 impact – main impact has been the transition to home working arrangements.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Control Effectiveness – 'some improvement required' reflects recent LPF assurance outcomes. 2021/22 coverage - A separate annual audit plan is prepared for LPF and approved by the Pensions Committee.
Finance Insurance Services	•	N/A	TBC	N	N	N	N	Original Risk Assessment – low risk assessment reflects the low risk associated with ensuring that the Council has established appropriate insurance arrangements to support service delivery. Relevant CLT Risks - reflected in the Service Delivery and Resilience CLT risks which have high and critical original risk assessments. Covid-19 impact – no significant Covid-19 impacts. Control Effectiveness – has not been assessed as no assurance work has been performed in business support since 2017/18 (Care Homes). 2021/22 Coverage - as Insurance Services has been assessed as low risk, no IA assurance is planned for 2021/22.
Properties and Facilities Management Building Programme Management Edinburgh Shared Repairs Service	•	•	1	Υ	Υ	Υ	Υ	Original Risk Assessment – critical risk assessment reflects the challenges associated with maintaining the Council's operational property portfolio in line with applicable legal and regulatory requirements; building security; and cleaning, janitorial, and catering provision for other Council services. Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; Financial and Budget

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Facilities Management Catering Services Security 								Management and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – significant impact on Properties and Facilities Management given involvement in closing buildings; implementing enhanced cleaning and infection control arrangements; supporting the shielding and vulnerable groups response, and support for children of key workers (preparation of food parcels and meals); and confirming readiness for properties to support return of services (implementation of social distancing measures). These impacts are reflected in the Council premises and security strategic risk included in the Covid-19 RMP. Control Effectiveness – 'significant improvement required' reflects recent assurance outcomes and progress with implementation of open assurance findings. 2021/22 coverage - Pre-implementation review of the design of the operational properties repairs and maintenance framework.
Chief Executive - Stra	tegy a	and Co	mmuni	cations	;			
Democracy; Governance; and Resilience Information Governance, and Data Protection; Records Management;	•		3	Y	N	Y	Y	Original Risk Assessment – high risk assessment reflects the legal, regulatory, and statutory requirements associated with these areas. Relevant CLT Risk - reflected in the Technology and Information and Service Delivery and CLT risks which have high original risk assessments. Covid-19 impact – support provided in relation to the data privacy aspects of new and amended Covid-19 processes implemented across the Council. These impacts are reflected in the strategic technology and information risk included in the Covid-19 RMP.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Freedom of Information; Subject Access and other statutory requests 								Control Effectiveness – 'some improvement required' reflects recent assurance outcomes and progress with implementation of agreed management actions to address findings raised. 2021/22 coverage – Statutory Request and Complaints Processes
Democracy; Governance; and Resilience Corporate Resilience Fraud and Serious Organised Crime	•	•	1	Y	Y	N	N	Original Risk Assessment – critical risk assessment reflects the importance of ensuring that an appropriate operational and technology resilience, and serious and organised crime frameworks have been established across the Council. Relevant CLT Risk - reflected in the Service Delivery; Resilience; and Governance and Decision making CLT risks which have high and critical original risk assessments. Covid-19 impact – significant impact as the Council had to invoke its emergency operational resilience arrangements. These impacts are reflected in the strategic Council response and governance risk included in the Covid-19 RMP. Control Effectiveness – 'significant improvement required' reflects the outcomes of the latest operational resilience audit (2017/18) and progress with implementation of recommendations. 2021/22 coverage – Covid-19 Thematic Lessons Learned
Democracy; Governance; and Resilience • Elections and Members Services	•	N/A	4	Υ	Y	N	N	Original Risk Assessment – high risk assessment reflects the importance of ensuring the smooth operation of the elections process; provision of support to elected members; and effective operation of the Council' executive and scrutiny committees. Relevant CLT Risk - reflected in the Service Delivery and Governance and Decision Making risks CLT risks which have high original risk assessments.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Committee Services								Covid-19 impact – the main challenge for Committee Services was supporting the transition to emergency decisioning and governance arrangements; supporting the phased reinstatement of Committees; and transitioning to supporting committee meetings by video conference. It is also highly likely that the May 21 elections will be completed during the pandemic. These impacts are reflected in the Council Response and Governance strategic risk
								included in the Covid-19 RMP. Control Effectiveness – not assessed as the outcomes of the 2020/21 review (GRBV Committee Effectiveness) have not been concluded. 2021/22 coverage - Elections
Democracy; Governance; and								Original Risk Assessment – high risk assessment reflects the importance of ensuring that the Council has established an effective corporate governance framework to support ongoing compliance with applicable legislation; regulations; and Council policies, and ensure that employee concerns can be safely and anonymously communicated ad regulated. whistleblowing process.
	•	•	2	Y	N	Υ	N	Relevant CLT Risk - reflected in the Service Delivery and Governance and Decision Making risks CLT risks which have high original risk assessments.
								Covid-19 impact – the main challenge for Corporate Governance was supporting operational decisioning and governance arrangements, and ensuring that appropriate arrangements were established to record all significant resilience decisions and actions.
								These impacts are reflected in the Council Response and Governance strategic risk included in the Covid-19 RMP.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Control Effectiveness – 'significant improvement required' reflects recent assurance outcomes in these areas and progress with implementation of recommendations. 2021/22 coverage – Implementation of Historic Whistleblowing Recommendations
Strategic Change					Y			Original Risk Assessment – critical risk assessment reflects the importance of developing and maintaining an appropriate strategy / business plan for the Council and supporting its delivery through effective implementation of major projects.
			2	Y		Υ		Relevant CLT Risk - reflected in the Strategic Delivery; Service Delivery; and Programme and Project Delivery CLT risks which have critical and high original risk assessments.
and DeliveryStrategic PlanningIntegrated Change	•						Y	Covid-19 impact – significant impact with the implementation of the Council's Adaptation and Renewal Programme to support the Council's recovery from the Covid-19 pandemic and the future adaptation and renewal of both Council services and the city.
/ major projects								Control Effectiveness – 'some improvement required' reflects recent assurance outcomes and the need to develop a framework to support effective governance and delivery of first line projects.
								These risks are reflected in the strategic delivery risk included in the CLT risk register.
								2021/22 coverage – Adaptation and Renewal Programme Governance and Delivery
Strategic Change and Delivery • Data,	•	•	ТВС	Y	Y	N	N	Original Risk Assessment – high risk assessment reflects the importance of an established and effective Council wide performance framework to confirm whether key performance objectives are being achieved and effective delivery of the Council's strategy / business plan.
Performance, and Business Planning								Relevant CLT Risk - reflected in the Governance and Decision and Service Delivery risks which have high original risk assessments.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Covid-19 impact – significant impact as this team was involved in providing a Covid-19 management information dashboard to the Council's Incident Management Team to support ongoing decision making, and preparing coordinated returns that were provided to the Scottish Government and COSLA. These impacts are reflected in the Council Response and Governance strategic risk included in the Covid-19 RMP. Control Effectiveness – 'effective' rating reflects recent assurance outcomes. 2021/22 coverage – Planning and Performance Framework – pre-implementation design review
Policy and Insight City Strategies Communities Insight Policy Unit (including carbon management)		N/A	TBC	Y	Ν	Y	N	Original Risk Assessment – high risk assessment reflects the importance of developing appropriate policies that support citizen needs and expectations; are aligned with the Council's strategy and business plan; and supports effective community engagement. Relevant CLT Risk – reflected in the Governance and Decision making CLT risk, which has a high original risk assessment. Covid-19 impact – significant impact on citizen engagement with the majority of locality offices closed and the transition to implementation of Council Resilience Centres for Place Localities, and Command Centres for the Health and Social Care Partnership. The Insight team was also involved in the design and implementation of employee wellbeing surveys. Control Effectiveness - has not been assessed as only limited assurance work has been performed in policy and insight since 2018/19. 2021/22 coverage – Council Emissions Plan

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Communications			3	N	Z	Y	Z	Original Risk Assessment – medium risk assessment reflects the importance of secure and effective communication with both citizens and employees and the need for appropriate data protection controls. Relevant CLT Risk - reflected in the Reputational CLT risk, which has a medium original risk assessment. Covid-19 impact – significant impact as the Communications team was involved in ensuring effective communication with citizens and employees in relation to decisions taken as the Council implemented its resilience response, and is now re-establishing services. These impacts are reflected in the Council Response and Governance strategic risk included in the Covid-19 RMP. Control Effectiveness – 'significant improvement required' rating reflects recent assurance outcomes 2021/22 coverage – no further coverage planned. Assurance will be provided through ongoing validation of management actions implemented to address recent assurance findings raised.
Communities and Fam	nilies							
Children's Services Children's Social Work Practice Teams and Review Service	•	N/A	ТВС	Y	N	N	N	Original Risk Assessment – critical risk assessment reflects the importance of children's social work in relation to child protection and protection of vulnerable groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Children's social work practice teams Children and young people's review team for looked after children Social Care Direct (allocation of requests to practice teams Social Care Direct — Children's Services Complaints 								Covid-19 impact – the main impact of Covid-19 was the transition to remote delivery of services and reduced contact with families. Control Effectiveness - has not been assessed as only limited assurance work has been performed in children's social work since 2017/18. 2021/22 coverage – Implementation of Child Protection Recommendations
 Children's Services Children with Disability Children's practice team Post-natal substance abuse support Residential and day services 	•	N/A	TBC	Ν	N	N	N	Original Risk Assessment – high risk assessment reflects the importance of supporting disabled children and their families combined with appropriate child protection measures and protection of vulnerable groups. Risk assessment has not changed in comparison to 2019/20. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the transition to remote delivery of services and reduced contact with families.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Disability behaviour serviceSelf-directed support								Control Effectiveness - has not been assessed as only limited assurance work has been performed in children with disability in recent years. 2021/22 coverage - there is no planned coverage of Policy and Insight in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews.
Children's Services Special Schools and Additional Support for Learning 11 special schools Additional support for learning Educational psychology Parent and pupil support	•	N/A	TBC	Y	N	N	N	Original Risk Assessment – high assessment reflects the importance of meeting the education combined with appropriate child and employee protection measures, and protection of vulnerable groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the transition to remote delivery of education. Control Effectiveness - will be assessed following completion of the audits included in the 2020/21 IA annual plan (Covid-19 Lessons Learned; Managing Violent and Aggressive Behaviour). 2021/22 coverage - there is no planned coverage of Special Schools and Additional Support for Learning in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews
Children's Services Looked After Children Secure Services Residential Care	•	N/A	ТВС	N	N	N	Y	Original Risk Assessment critical risk assessment reflects the importance of looked after children in relation to child protection and protection of vulnerable groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Fostering / Adoption / Kinship Family Group Decision Making Mutisystemic Therapy Occupational Therapy Throughcare and Aftercare Corporate Parenting Children's Rights 								Covid-19 impact – the main impact of Covid-19 was the potential impact of infection and workforce availability. Contingent workforce arrangements were established to ensure ongoing workforce capacity in the event of increased levels of absence. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP. Control Effectiveness - has not been assessed as only limited assurance work has been performed in special schools and additional support for learning in recent years, and 2020/21 assurance outcomes have not yet been finalised. 2021/22 coverage - there is no planned coverage of Looked After Children in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews
Children's Services Young People's Service (12- 17) Offensive / harmful behaviour Substance misuse Foster care issues Homelessness	•	N/A	TBC	Z	N	N	N	Original Risk Assessment - high risk assessment reflects the importance of young People's Service in relation to child protection and protection of vulnerable groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact — the main impact of Covid-19 was the transition to remote delivery of services and reduced contact with families. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP. Control Effectiveness - has not been assessed as only limited assurance work has been performed in Young People's service in recent years.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								2021/22 coverage - there is no planned coverage of Young People's Service in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews
Estates and Operational Support Capital Projects and School Estate Planning			5	N	N	Y	Y	Original Risk Assessment (March 2020) - medium risk assessment reflects the importance of effective management of capital projects and the need to have a clear strategy for school estates that reflects future demand. Relevant CLT Risk - reflected in the Strategic Delivery and Programme and Project Delivery CLT risks, which have critical and high original risk assessments. Covid-19 impact – the main impact of Covid-19 was the cessation of all capital projects and their subsequent reinstatement with enhanced social distancing measures. These impacts are reflected in the Supply chain risk; Financial and economic risk; and Legal and Commercial Risk strategic risks included in the Covid-19 RMP. Control Effectiveness – effective rating reflects recent assurance outcomes. 2021/22 coverage - whilst no specific audits are planned in this area for 2021/22, ongoing assurance will be provided through ongoing follow-up of relevant findings raised in the 2019/20 Governance of First Line Projects outwith the Major Projects Portfolio audit.
Estates and Operational Support Statutory Consultation and Catchment Reviews		N/A	TBC	N	N	N	N	Original Risk Assessment – medium risk assessment reflects the importance of ensuring that school catchment areas continue to meet demand and the changing demographic of the city. Relevant CLT Risk - reflected in the Strategic Delivery and Regulatory and Legislative Compliance CLT risks which have critical and high original risk assessments.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Covid-19 impact - the main impact of Covid-19 was the transition to remote work to support completion of these processes. Control Effectiveness - has not been assessed as only limited assurance work has been performed in Statutory Consultation and Catchment Reviews in recent years. 2021/22 coverage - no assurance coverage is planned in 2021/22.
Estates and Operational Support Client Management and Home to School Transport		•	4	N	N	Υ	N	Original Risk Assessment - medium risk assessment reflects the importance of ensuring safe home to school transport for children, considering the importance of child protection and protection of vulnerable groups requirements. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the cessation of these services and their subsequent reinstatement with enhanced infection protection and social distancing measures. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP. Control Effectiveness - effective rating reflects recent assurance outcomes. 2021/22 coverage - no assurance coverage is planned in 2021/22.
Schools and Lifelong Learning Early Years and Childcare	•	N/A	ТВС	Y	N	N	N	Original Risk Assessment - high risk assessment reflects the importance of early years childcare in relation to child protection and protection of vulnerable groups.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Childcare provision Supporting parents and carers Quality improvement 								Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the cessation of these services and their subsequent reinstatement with enhanced infection protection and social distancing measures. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and Availability of Employees to Deliver Critical Services strategic risks included in the Covid-19 RMP. Control Effectiveness - has not been assessed as only limited assurance work has been performed in early years and childcare in recent years. 2021/22 coverage – Availability of Early Years Education and Alignment with the Poverty Strategy
Schools and Lifelong Learning Lifelong Learning teacher professional learning creative learning in schools sport and physical activity community learning and		N/A	TBC	N	N	N	N	Original Risk Assessment - medium risk assessment reflects the importance of including creativity and physical activity in learning; ensuring that teachers continue to meet their ongoing professional development requirements; provision of library services; and supporting community development and learning. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the majority of these services have transitioned to remote delivery during both lockdowns, with libraries mostly closed. Control Effectiveness - has not been assessed as only limited assurance work has been performed in lifelong learning in recent years.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
development and libraries								2021/22 coverage - there is no planned coverage of Lifelong Learning in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews
Schools and Lifelong Learning Schools quality, Improvement, and Curriculum Leadership Self-evaluation Learning and teaching approaches Meeting Learners Needs Curriculum planning and delivery HME Inspections	•		4	Y	N	N	N	Original Risk Assessment - high risk reflects the need to ensure delivery of an appropriate quality of education that is aligned with expected Education Scotland standards. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the requirement to design and implement remote learning arrangement for pupils during lockdown. Control Effectiveness – 'effective' assessment is based on Education Scotland inspection outcomes, where no significant concerns have been identified as IA has only performed limited assurance work in this area in recent years. 2021/22 coverage - there is no planned coverage of Schools Improvement and Curriculum in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews and reliance will be placed on Education Scotland inspection outcomes.
Schools and Lifelong Learning Schools School Admissions	•	•	2	N	Y	Y	Y	Original Risk Assessment - high risk assessment has not changed in comparison to 2019/20. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Schools complaints								Covid-19 impact – the main impact of Covid-19 was the cancellation of exams and allocation of grades in line with Scottish Qualifications Authority guidance; closure of schools during both lockdowns; and their subsequent reopening with enhanced infection control procedures. Control Effectiveness – 'significant improvement required' reflects recent assurance outcomes 2021/22 coverage - ongoing assurance in 2021/22 will be provided through ongoing follow up of relevant findings raised in the 2019/20 Schools Admissions and Inclusion audit.
Schools and Lifelong Learning Pupil and Parent Support Child protection in schools and lifelong learning Parental engagement and support Educational welfare service School placements		N/A	TBC	N	N	Z	N	Original Risk Assessment - high risk assessment reflects the importance pupil and parent support in relation to child protection and protection of vulnerable groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the transition to remote delivery of these services. Control Effectiveness – 'has not been assessed as only limited assurance work has been performed in pupil and parent support in recent years. 2021/22 coverage – there is no planned coverage of Pupil and Parent Support in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Schools and Lifelong Learning Children's Services Lifelong Links Family research and tracing Support relationship reestablishment Support production of family plans	•	N/A	TBC	N	N	N	N	Original Risk Assessment - medium risk assessment reflects the importance of sourcing complete and accurate information to support family tracing. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact of Covid-19 was the transition to remote delivery of these services. Control Effectiveness – has not been assessed as only limited assurance work has been performed in lifelong links in recent years. 2021/22 coverage – there is no planned coverage of Lifelong Links in the 2021/22 annual plan, however assurance may be provided through Council wide thematic reviews
Safer and Stronger Communities / Chief Social Work Officer Homelessness and Housing Support	•		2	N	Z	Y	Y	Original Risk Assessment - critical risk assessment reflects the need to deliver an effective homelessness and housing support service to support vulnerable individuals and families. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – significant impact as urgent additional arrangements were required to provide appropriate accommodation for homeless citizens that supported self-isolation (where required) and reduced the risk of infection spreading; reduced availability of 'move on' tenancies; implementation of the Scottish Government's unsuitable accommodation order; and addressing challenges such as homeless people with no recourse to public funds.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP. 2021/22 coverage – no assurance coverage is planned for 2021/22, however the areas noted above will be considered for inclusion in the 2022/23 annual plan.
Safer and Stronger Communities / Chief Social Work Officer Community Justice and intervention Reintegration and supervision of offenders into communities over the age of 18.	•	N/A	TBC	Y	N	N	N	Original Risk Assessment - critical risk assessment reflects the importance of ensuring that offenders are safely integrated into communities with appropriate support, and that all prison discharge conditions are effectively complied with. Protection of children and vulnerable adults is also a significant risk for this service. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact was the planned early release of prisoners to minimise spread of infection in prisons, where community justice support was required, together with the transition to home working, however this risk did not crystallise as release volumes did not significantly increase. Control Effectiveness – has not been assessed as only limited assurance work has been performed in community justice and intervention in recent years. 2021/22 coverage – Criminal Justice
Safer and Stronger Communities / Chief Social Work Officer	•	•	3	N	Y	N	Y	Original Risk Assessment – high risk assessment reflects the importance of production of the annual Chief Social Work Officer's report that is based on appropriate coverage of children and adult social care services across the Council, and is aligned with applicable legal, regulatory, and statutory requirements.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Chief Social Work Officer's report Quality, Governance, and Regulation - Internal quality assurance provided across children and adult social care 								Assurance provided by the Quality, Governance, and Regulation (QGR) team is also important as it ensures that issues can be identified and address before they become significant or thematic. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – transition to home working and adapting processes and procedures to accommodate any service delivery changes implemented in response to Covid-19. Control Effectiveness – 'some improvement required' reflects recent QGR outcomes. This assessment will also be updated to reflect 2020/21 assurance outcomes in relation to the CSWO report, which have not yet been finalised. 2021/22 coverage - there is no planned coverage the CSWO and QGR in the 2021/22 annual plan, however assurance may be provided through follow-up of any findings raised in the 2020/21 CSWO audit and may also be provided through Council wide thematic reviews
Health and Social Care)							
Accommodation Care Home Placement	•	•	2	N	Υ	N	N	Original Risk Assessment – critical risk assessment reflects the significant risks associated with caring for care home residents, including protecting vulnerable adults. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact was significant given focus on creating capacity in care homes to support the NHS. This resulted in implementation of the Home First / SafeHaven model to support

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								ongoing assessment of demand and capacity. Personal protective equipment; infection control; and testing arrangements were also implemented to protect both residents and employees, and visiting arrangements stopped. Workforce planning arrangements were also implemented to ensure that there was sufficient workforce available from either Council employees or agency support to ensure ongoing delivery of care. Arrangements were also implemented to support the Councils oversight of private care homes in line with Scottish Government requirements.
								These impacts are reflected in the Health and Safety of Citizens and Service Users; the Health and Availability of Employees to Deliver Critical Services; Supply Chain; and Financial and Economic strategic risks included in the Covid-19 RMP.
								Control Effectiveness – 'significant improvement required' assessment reflects progress with implementation of actions to address assurance outcomes raised in the 2017/18 Care Homes Audit and The Care Inspectorate / Healthcare Improvement Scotland joint inspection report (May 17) and subsequent December 2018 progress review.
								2021/22 coverage – assurance in 2021/22 will be provided through and ongoing follow-up of the remaining findings raised in the May 17 Care Homes audit and Covid-19 lessons learned assurance work completed in 2020/21.
Assessment, Support, Planning, and Review Direct Payments Individual Service Fund	•	•	1	N	Y	N	Υ	Original Risk Assessment – critical risk assessment reflects the significant risks associated assessing care requirements and ensuring that optimal care arrangements are provided for citizens. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Covid-19 impact was significant as focus was on hospital discharge timeframes and establishing urgent care arrangements, with a further impact on existing waiting lists and assessments. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of Employees to Deliver Critical Services strategic risks included in the Covid-19 RMP.
								Control Effectiveness – 'significant improvement required' assessment reflects progress with implementation of actions to address assurance outcomes raised in the 2017/18 audit in this area, and The Care Inspectorate / Healthcare Improvement Scotland joint inspection report (May 17) and subsequent December 2018 progress review. The 2020/21 audit of Management of Waiting Lists and Assessments is currently in progress, and the control effectiveness assessment will be updated to reflect the outcomes of this review. 2021/22 coverage – no further assurance is planned for 2021/22. Assurance will be provided through the ongoing validation of management actions implemented to address the assurance findings noted above.
Community Based Support Day Care Support and Advice Homecare and Support Telecare	•		2	Υ	N	N	Υ	Original Risk Assessment - critical risk assessment reflects the importance of provision of quality day care; homecare; and telecare emergency response service that meets citizens needs and the requirement to protect vulnerable adults and groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact was essentially cessation of all non-urgent services, and transition to working from home arrangements (for example Telecare) where possible.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								Control Effectiveness - significant improvement required' assessment reflects progress with implementation of actions to address assurance outcomes raised in the 2018/19 Telecare audit, and The Care Inspectorate / Healthcare Improvement Scotland joint inspection report (May 17) and subsequent December 2018 progress review. 2021/22 coverage - Day Care to Adult Social Care Transition Arrangements
Sensory Support Support for deaf, blind and partially sighted		N/A	TBC	N	N	N	N	Original Risk Assessment – medium risk assessment reflects the need for provision f deaf, blind, and partially sighted support services, and the requirement to protect vulnerable adults and groups. Relevant CLT Risk- reflected in the Service Delivery and Regulatory and Legislative Compliance CLT risks, which both have a high original risk assessment. Covid-19 impact – the main impact transition to working from home and provision of remote services where possible. Control Effectiveness – has not been assessed as only limited assurance work has been performed in community justice and intervention in recent years. 2021/22 coverage - no specific audit coverage is planned for 2021/22, although assurance may be provided through thematic Council wide reviews.
Place								
Place Management Waste and Cleansing Refuse and recycling	•	•	3	N	N	N	Y	Original Risk Assessment – high risk assessment rating reflects the public health and safety and legal, regulatory, and statutory requirements associated with delivery of these services.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Community recycling centres Special uplifts Bin maintenance, repair and delivery Fly tipping Business waste enforcement Litter Bins Street cleaning 								Relevant CLT Risk- reflected in the Service Delivery; Regulatory and Legislative Compliance; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – the main impact was cancellation and subsequent reintroduction of services with enhanced infection control and social distancing measures applied. These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of Employees to Deliver Critical Services strategic risks included in the Covid-19 RMP. Control Effectiveness – 'effective' assessment reflects the outcomes of two audits completed in 2017/18 and progress with implementation of recommendations. 2021/22 coverage - no specific audit coverage is planned for 2021/22, although assurance may be provided through planned thematic Council wide reviews.
Place Management Network Management and Enforcement Parking operations and traffic regulation City-wide road coordination Intelligent traffic systems	•		3	N	Y	N	Y	Original Risk Assessment – high risk assessment reflects the need to enforce traffic regulations to support public safety in line with applicable legislative, regulatory and statutory requirements, together with the need to support income generation from fees and charges. Relevant CLT Risk- reflected in the Service Delivery; Regulatory and Legislative Compliance; Programme Management and Delivery; and Health and Safety (including public safety) CLT risks which have high and critical (Health and Safety) original risk assessments. Covid-19 impact – parking charges were suspended during the initial March lockdown and then reinstated in late June 2020. Spaces for People initiative was also implemented to

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Street and environmental enforcement Electrical vehicle charging Spaces for people 								ensure that the city's roads were adapted to enable citizens to navigate the city safely whilst observing social distancing measures. Control Effectiveness – 'effective' assessment reflects the outcomes of two audits completed in 2017/18 and progress with implementation of recommendations. Assurance work for 2020/21 is ongoing and the control effectiveness assessment will be updated to reflect these outcomes. 2021/22 coverage - no specific audit coverage is planned for 2021/22, although assurance may be provided through planned thematic Council wide reviews.
Place Management Roads and Transport Infrastructure Street lighting and traffic signs Assets and performance (transport asset management plan) Transport contracts and design Road operations Structures and flood prevention	•		2	N	Z	Y	Y	Original Risk Assessment – critical risk assessment reflects the health and safety risks associated with effective ongoing maintenance of the city's roads and transport infrastructure, and the security risks associated with the operation of Hawes Pier to support passengers disembarking from cruise ships to visit Edinburgh. Relevant CLT Risks- reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – road maintenance activities were reduced with focus on only essential urgent repairs. Control Effectiveness – 'effective' assessment reflects recent assurance outcomes and progress with implementation of management actions to address findings raised. 2021/22 coverage - Annual Port Facility Security audit is currently included in the plan, although the Department for transport has been contacted to determine whether this can be deferred for one further year. No other audit coverage is planned for 2021/22, although

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								assurance will be provided through validation of management actions to support closure of open findings and may also be provided through planned thematic Council wide reviews.
Place Management Strategic Transport Road safety and Active Travel Public Transport Spatial Policy Transport Projects		N/A	TBC	Y	Y	Y	N	Original Risk Assessment – high risk assessment reflects the health and safety risks associated with effective ongoing road safety and oversight and engagement with the Transport for Edinburgh (TfE) arm's length external organisation Relevant CLT Risks- reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – significant decrease in demand for public transport, and cessation of capital works during initial lockdown. Transport projects have now recommenced subject to appropriate social distancing measures. Control Effectiveness – whilst the ongoing review of the Tram to Newhaven project has not raised any significant findings, two reviews included in the 2020/21 annual plan are in progress and have not yet been finalised. The control effectiveness assessment will be refreshed once these have been completed. 2021/22 coverage – 2021/22 assurance coverage will include the ongoing agile review of the Trams to Newhaven project, and validation of management actions implemented to address any findings raised in the 2020/21 Active Travel.
Place Management Fleet and Workshops • Purchasing vehicles	•	•	3	N	N	Y	Y	Original Risk Assessment - ccritical risk assessment reflects health and safety risks associated with ensuring that vehicles are legally fit to drive, and that drivers are both legally and medically fit to drive.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Vehicle hires Driver licence checks and permits Fuel Road tax, spot checks and tachograph Planned maintenance and MOTs Compliance testing for all licences taxi and private hires 								Relevant CLT Risks- reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – reduced demand for Council fleet following cessation of a number of Council services during lockdown. Control Effectiveness – 'effective' assessment reflects progress with implementation of actions to address significant findings raised in audits completed in 2017/18 and subsequent years. 2021/22 coverage - No audit coverage is planned for 2021/22, although assurance will be provided through validation of management actions to support closure of open findings, and may also be provided through planned thematic Council wide reviews
Place Management Parks, Greenspace, and Cemeteries Parks programmes Events Play park design Allotments and community food Physical structures (e.g. trees and gravestones)	•		2	Y	N	Y	Z	Original Risk Assessment - critical risk assessment reflects the health and safety risks associated with ongoing maintenance of physical and natural structures (for example trees; gravestones); and use of high risk mechanical equipment to support these activities, and the need to be compliant with applicable legislation, regulation and statutory requirements, Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – parks and public spaces were initially closed during lockdown and subsequently reopened with implementation of social distancing measures in line with Scottish Government requirements; increased volumes of burial services were subject to social distancing rules.

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Maintenance (parks; sport pitches; school fields; verges etc) Forestry and natural heritage (trees; nature reserves; river corridors; Pentland Hills Regional Park) Botanic gardens Nurseries Cemeteries 								These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and Availability of Employees to Deliver Critical Services strategic risks included in the Covid-19 RMP. Control Effectiveness – 'some improvement required' assessment reflects recent assurance outcomes and progress with implementation of actions to address findings raised 2021/22 coverage – Ongoing maintenance of physical and natural structures.
Place Management Scientific, Bereavement and Registration Services Food testing Air testing Water testing Trading standards testing Pest Control	•		2	Y	Y	Y	N	Original Risk Assessment (March 2020) - critical risk assessment reflects the health and safety risks, and specifically public safety risks associated with ongoing delivery of these services, and the need to be compliant with applicable legislation, regulation and statutory requirements, Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – significant impact in terms of adequacy of mortuary capacity to support expected increase in death rate; implementation of changes to funeral services; increased focus on timeliness of death registrations to support Scottish Government statistics; cessation of marriage and birth registrations and their subsequent reinstatement; personal

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes				
 Burials, Cremations, and Memorials Mortuaries Registration of 								protective equipment and hand sanitisation testing support arrangements; establishing advice service to support application of safe working practices. These impacts are reflected in the Health and Safety of Citizens and Service Users; the Health and Availability of Employees to Deliver Critical Services; and Council Response and Governance strategic risks included in the Covid-19 RMP.				
births, deaths and marriages Nationality checking Civil ceremonies								Control Effectiveness – 'some improvement required' assessment reflects recent assurance outcomes and progress with implementation of actions to address findings raised. Completion of the 2021/22 audits of Registration and Bereavement Services and Implementation of Asbestos Recommendations are in progress, and this assessment will be updated to reflect the outcomes of these reviews. 2021/22 coverage - Food and Water Testing				
Place Development Planning and Building Standards Major developments planning (including developer contributions) Householder developments and enforcement	•		4	Y	N	Y	Y	Original Risk Assessment – high risk assessment reflects the importance of ensuring that all developments across the city are approved in line with applicable planning and building standards legislative and regulatory requirements and planning policies. This assessment also reflects the potential health and safety implications associated with poor quality building standards assessments. Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – the service transitioned to working from home and also had to incorporate Scottish Government extended timeframes for completion of planning requirements and building warrants into their processes.				

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
 Local developments and listed buildings Building warrant applications 								These impacts are reflected in the Health and Safety of Citizens and Service Users and the Health and availability of employees to deliver critical services strategic risks included in the Covid-19 RMP. Control effectiveness – 'effective rating reflects progress with implementation of agreed managements to address significant building standards assurance outcomes. 2021/22 coverage - Planning
Place Development Citywide Transport and Planning Planning initiatives (build and natural heritage) Local Development Plan Spatial policy – (transport, planning and air quality development) Service development and appeals – review of planning applications and appeals;		N/A	TBC	Y	Z	Z	Z	Original Risk Assessment – high risk assessment reflects the strategic importance developing the local development plan to support future development across the city, and the importance of effective independent review of planning appeals. Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance CLT risks which have high original risk assessments. Covid-19 impact – the service transitioned to working from home. Control Effectiveness – has not been assessed as only limited assurance work has been performed in citywide transport and planning in recent years. The process supporting preparation of the Local Development Plan (LDP) was last reviewed in 2017/18, and the planning appeals process has not been subject to recent review. 2021/22 coverage - Planning

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
complaints; communications; performance reporting								
Place Development								Original Risk Assessment – risk assessed as high reflecting the importance of defining and delivering an affordable housing strategy that is linked to the housing construction and regeneration programme and allocation of Council houses to citizens.
Housing Management and Development • Housing performance and service								Relevant CLT Risks - reflected in the Strategic Delivery; Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; Financial and Budget Management; Programme and Project Delivery and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments.
 improvements HRA income collection Edindex and choice based 	•	•	4	Y	N	Y	Y	Covid-19 impact – impact on delivery of affordable housing targets due to cessation of all capital projects and construction activities, and subsequent reinstatement with appropriate social distancing measures. Potential impact on ability to collect HRA income where tenants have experienced difficulty during Covid-19.
lettings Housing								These impacts are reflected in the Supply Chain; Financial and Economic; and Legal and Commercial Risk risks included in the Covid-19 RMP.
construction programme / regeneration projects • Funding and								Control Effectiveness – 'effective' assessment reflects the positive outcomes of the audit of the Development of the Strategic Housing Investment Plan completed in 2019/20, and the annual audit of the Transfer of the Management of Development Funding performed by the Scottish Government.
delivering and delivering affordable homes								2021/22 coverage – the annual Scottish Government audit of the Management of Development Funding is currently included in the plan; however the Scottish Government has been contacted to determine whether this can be deferred for a further year, enabling

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
								IA to direct effort towards higher risk areas. An audit of the Council Housing Allocation Process is also included in the plan.
								Original Risk Assessment – critical risk assessment reflects the health and safety; legislative, regulatory and statutory; and financial risks associated with delivery of these services.
Place Development Regulatory Services								Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; Financial and Budget Management and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments.
 Licencing Licencing enforcement Trading standards Environmental 	•	•	2	Y	Y	Ν	Y	Covid-19 impact – significant impact with the extension of a number of licences (for example taxi licences) and associated loss if income. The service also had to transition to working from home where possible. The service was also responsible for implementation and administration of processes supporting allocation of Scottish Government funding to taxi drivers.
Health Food Health and								These impacts are reflected in Financial and Economic and Legal and Commercial Risk risks included in the Covid-19 RMP.
Safety								Control Effectiveness – 'some improvement required' assessment reflects the outcomes of two assurance reviews (Fees and Charges and HMO Licencing) completed in 2018/19, and progress with implementation of agreed management actions to address findings raised.
								2021/22 coverage – Food and Water Testing

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Place Development Sustainability Sustainable Energy Action Plan Energy Efficiency District Heating Renewables Electric vehicle infrastructure Energy for Edinburgh / Community Energy Low Carbon Jobs and Investment / Circular Economy Corporate Sustainability Initiatives			5	N	N	Z	Y	Original Risk Assessment – medium risk assessment reflects the risks associated with supporting the city to improve its carbon footprint through delivery of these services. Relevant CLT Risks - reflected in the Strategic Delivery and Programme and Project Delivery CLT risks which have critical and high original risk assessments. Covid-19 impact – significant improvement in carbon reduction evident from both lockdowns, but no significant risk to the Council. Services have also transitioned to working from home. Control Effectiveness – 'effective' assessment reflects the outcomes the Carbon Reduction Commitment Scheme Audit completed in 2018/19. No further assurance work has been performed since then. 2021/22 coverage – no specific audits are planned in this areas, enabling IA to direct effort towards higher risk areas.
Place Development Housing Property Responsive repairs Planned maintenance	•	•	2	Y	Y	Υ	N	Original Risk Assessment – critical risk assessment reflects the health and safety risks associated with maintaining the condition of council properties leased to private citizens. Risk assessment has not changed in comparison to 2019/20. Relevant CLT Risks - reflected in the Service Delivery; Regulatory and Legislative Compliance; Supplier, Contractor, and Partnership Management; Financial and Budget

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes	
 Mechanical and electrical Capital programme Repairs and materials contracts Council house sales Factoring Right to repair 								Management and Health and Safety (including public safety) CLT risks which have high and critical original risk assessments. Covid-19 impact – initial reduction on services with focus initially only on emergency repairs. These impacts are reflected in the Health and Safety of Citizens and Service Users; and Health and Availability of Employees to Deliver Critical Services risks include in the Covid-19 RMP. Control Effectiveness – 'some improvement required' assessment reflects the outcome of the recent life safety and asbestos audits. The 2020/21 audit to assess progress with implementation of asbestos recommendations is in progress, and this assessment will be refreshed following completion. 2021/22 coverage – Housing Property Services – Repairs Management	
Place Development Business Growth and Inclusion Provides advice and support for businesses in the city, mainly through Business Gateway, and support for programmes to assist people into work.	•	N/A	TBC	Y	N	N	N	Original Risk Assessment – medium risk assessment reflects the reputational risk associated with the potential to provide incomplete; inaccurate; or poor quality advice to business. Relevant CLT Risks - reflected in the Service Delivery and Reputational CLT risks which have high and medium original risk assessments. Covid-19 impact –responsible for design and implementation of the discretionary grants process supporting allocation of grant funding across businesses in the city. Service has also transitioned to working from home arrangements. Control Effectiveness – has not been assessed as this is a relatively new service that has not been covered by any recent assurance reviews. 2021/22 coverage – Management and Allocation of Covid-19 Grant Funding	

Auditable Area	Original Risk	Control Effectiveness	Audit Frequency	Included in 2021/22 Plan	Included in 2020/21 Plan	Included in 2019/20 Plan	Included in 2018/19 Plan	Notes
Culture • Cultural Funding								Original Risk Assessment – high risk assessment reflects the health and safety risks associated with the ongoing operation of cultural venues; income collection; and allocation of cultural funding to applicants. Relevant CLT Risks - reflected in the Service Delivery; Health and Safety; and the Financial and Budget Management risks which have high and critical original risk assessments.
Cultural VenuesCollectionsOutreachArchaeology	•	N/A	TBC	N	N	N	Y	Covid-19 impact – the main impact has been closure of cultural venues and the associated loss of income and impact on employees. These impacts are reflected in the Health and Safety of Citizens and Service Users; and the Financial and Economic strategic risks included in the Covid-19 RMP.
								Control Effectiveness – has not been assessed as the only recent review in this area covered allocation of grant funding to one specific charity. 2021/22 coverage - no specific audits are planned in this area in 2021/22.

3. Annual Internal Audit plan – Step 7

3.1 Developing the IA annual plan

The next stage of the process following completion of the risk assessment is to build the annual IA plan, and figure 3 below illustrates how this is achieved.

Figure 3: IA annual planning process



3.2 Internal Audit Resources

Available IA resources

As part of the annual planning process, the level of currently available IA resources, experience and skills was considered.

The overall capacity of currently projected available IA resources for 1 October 2020 to 31 March 2021 (excluding annual leave and public holidays) is 2,764 days. This assumes that there will be no turnover in the team during the plan year.

Allowing for potential sickness absence (2% of available days) and time reserved to support team training and personal development; performance management; ongoing enhancement of our audit system; and governance and committee reporting activities (circa 30% of available days) approximately 1,678 days are available to support delivery of the plan, which is proportionately aligned with IA capacity to deliver the plan in previous years.

The plan also includes circa 40 days contingency time which is the equivalent of 1.6 completed audits.

Two annual (low risk) audits requested by the Department for Transport and the Scottish Government are included in the plan. Both organisations have been contacted to determine whether these audits can be delayed until 2022/23 to enable focus on other higher risk areas. If these audits can be removed from the plan, this will release a further 40 days contingency time, increasing the total to circa 80 days.

Co-source arrangements

Established co-source arrangements are currently being re-procured as the previous contract with PwC will conclude on 31 March. It is expected that the new co-source arrangement will be finalised early in the plan year, enabling use of co-source services to support specialist audits where the required skills sets, or capacity are not available within the IA team.

Capacity to deliver the IA plan

Based on the IA capacity model, the current IA structure is adequately resourced to support delivery of the proposed audit plan (detailed at 3.5 below) which requires a total of 1,870 available days.

This includes an allocation of including 25 days for completion of internal and external IA quality assurance assessments and delivery of training across the Council, leaving a balance of 1,845 assurance days to be delivered.

A total of 230 days will be delivered either through co-source arrangements, leaving balance of 1,615 assurance days to be delivered by the Council's IA team.

Additional resourcing challenges

Whilst the IA team is currently at full capacity, like all other teams within the Council, IA is required to ensure that it balances the requirements for both effectiveness and efficiency, which includes keeping resource levels under regular review.

If any new or emerging resourcing challenges occur during the year, they will be discussed initially with the Head of Legal and Risk and the Executive Director of Resources; the CLT; and the Convenor of GRBV. If resourcing issues remain unresolved following these discussions, the matter will be highlighted to a full GRBV Committee Meeting.

3.3 Proposed Internal Audit Annual Plan 2021 - 22

3.3.1 Plan Summary

The internal audit plan detailed below reflects the key areas of IA focus for 2021/22 and is based upon the PSIAS; the Council's organisational objectives and priorities; and an assessment of the CLT risks that could prevent the Council from meeting those objectives and providing services to citizens.

Each proposed review for 2021/22 has been cross referenced to the corresponding 11 strategic CLT risks presented to GRBV in December 2020 and the strategic risks included in the Covid-19 Risk Management Plan.

Audits delivered across the Council

A total of 46 audits are included in the 2021/22 IA plan. Of these 36 will be delivered across the Council, with the balance of 10 reviews delivered to support arm's length external organisations.

This number may reduce to 34 audits if permission is granted by the Department for Transport and the Scottish Government to delay their two annual (low risk) audits into the 2022/23 plan year.

A summary of proposed Council audit coverage in comparison to 2020/21 completed audits is detailed below. Please note that specific Directorate coverage will also increase as a result of Council wide thematic reviews.

Directorate	2021/22 Planned Audits	2020/21 Planned Audits	Comments
Council Wide	7	12	Council wide audits will cover all major service areas of the Council. This increase is due to inclusion of a number of Council-wide Covid-19 audits.
Council Wide	1	1	Follow-up. This involves review of completion of all agreed management actions prior to closure across all areas of the Council
Major Project Reviews	3	3	Includes ongoing agile IA work on the Adaptation and Renewal Programme; Tram to Newhaven and Enterprise Resource Planning Projects.
Resources	8	10	Increased coverage reflects a number of carried forward Digital Services audits from 2019/20 and addition of Covid-19 design assurance audits that are specific to the Resources directorate.
Chief Executive's Service / Strategy and Communications	4	1	Planned coverage is broadly aligned with the number of audits completed in 2019/20.
Communities and Families (including Safer and Stronger Communities)	4	4	Slight increase in coverage in comparison to audits completed in 2019/20. Additional coverage will also be provided planned by Council wide reviews.
Health and Social Care Partnership	2	2	No change in coverage in comparison to 2019/20. Additional coverage will also be provided planned by Council wide reviews.
Place	7	4	The Department for Transport and the Scottish Government have been contacted to determine whether the two annual (low risk) reviews completed for these organisations (Port Facility Security Plan, and Management of Development Funding) can be deferred until 2022/23. These audits
Totals	36	37	

Council wide reviews

Council-wide and multiple service reviews will potentially cover all Council directorates and divisions. These have been included to provide assurance on the key controls established to manage the most significant and thematic service delivery risks and processes across the Council.

It is important to note that a validation audit will be performed in 2021/22 to confirm that management actions implemented to support previously closed IA findings have been effectively implemented and sustained. This will provide assurance on the ongoing effectiveness of 'business as usual' operational service delivery risks that could potentially have been impacted by the Council's Covid-19 resilience response.

Follow Up

A total of 625 audit days (the equivalent of circa 25 audits) has been provided to support the ongoing IA follow up process This reflects an increase of 125 days (circa 5 audits) in comparison to prior years in response to the increased focus across the Council on closure of open IA findings.

This increase in follow-up days also reflects that IA will not apply a 'risk based' follow up approach during 2021/22, based on the need to further improve risk and control awareness and embed the risk and control culture across the Council. The potential to implement a risk based follow up approach will continue to be reconsidered annually.

IA services provided to arm's length external organisations

A total of 10 audits will be delivered for arm's length and external organisations (ALEOs): 4 for the Lothian Pension Fund; 3 for the Edinburgh Integration Joint Board; and the remaining 3 comprising one audit each for the Lothian Valuation Joint Board; SEStran; and the Edinburgh Royal Military Tattoo.

Use of co source arrangements to support plan delivery

A total of 9 audits (including 3 of the four planned Lothian Pension Fund audits) will be delivered by external specialists, which remains aligned with the number of specialist reviews completed in 2020/21.

These will include delivery of 4 technology related audits and 2 health and safety specialist audits for the Council.

This leaves a balance of 37 audits (30 Council audits plus the remaining 7 ALEO audits) to be delivered by the Council's IA team.

This approach will ensure that appropriate technology skills and experience is available to support the technology related audits and will also ensure that IA independence is appropriately maintained in relation to the planned Health and Safety audits.

Training

A total of 5 days has been included in the plan to support delivery of ongoing training across the Council. This reflects delivery of one half day of training per quarter that will be open to all employees; and IA attendance at, and involvement in, new start and senior management induction training.

Quality Assurance

A total of 20 days has been included for both internal IA quality assessment and the external quality assessment that is due to be completed in 2021/22, as per the five-year EQA cycle requirement specified in the PSIAS.

3.3.2 Areas Not Covered by the 2021/22 IA Annual Plan

Based on the IA risk assessment; control effectiveness; and audit coverage methodology, the following areas that were due for inclusion in the 2021/22 IA annual plan have not been included as available IA capacity has been directed towards other areas.

It should be noted that some of these areas may be covered by Council wide thematic reviews once the detailed scopes of these reviews have been determined.

As no IA assurance is planned in these areas, there is a possibility that the risks they manage may become issues in these areas.

Service	Original Risk Assessment	Audit Coverage Frequency	Last Reviewed
Resources			
Customer and Digital Services – Business Support	•	ТВС	2018/19
Finance - Insurance Services	•	TBC	Not Known
Communities and Families			
Children's Services - Children with Disability	•	ТВС	Not Known
Estates and Operational Support - Statutory Consultation and Catchment Reviews	•	ТВС	Not Known
Children's Services - Looked After Children	•	ТВС	Care Inspectorate Assurance
Children's Services - Young People's Service (12- 17)	•	ТВС	Not Known
Schools and Lifelong Learning - Lifelong Learning	•	ТВС	Not Known
Schools and Lifelong Learning - Pupil and Parent Support	•	ТВС	Not Known
Schools and Lifelong Learning Children's Services - Lifelong Links	•	ТВС	Not Known
Safer and Stronger Communities / Chief Social Work Officer Homelessness and Housing Support	•	2	2019/20 – reliance on follow-up
Health and Social Care Partnership			
HSC Sensory Support - Support for deaf, blind and partially sighted	•	ТВС	Not Known
Place			
Place Management - Waste and Cleansing	•	3	2018/19 – reliance on follow-up
Place Management Roads and Transport Infrastructure	•	2	2019/20 – reliance on follow-up
Culture	•	ТВС	2018/19 – limited coverage

3.3.3 Coordinated and Integrated approach with External Audit; Audit Scotland; and Local Area Network Members

External Audit

As noted at section 1.5 above, a coordinated and integrated approach will be adopted with IA and Azets working together to deliver assurance on three reviews - the Tram extension project; the Enterprise Resource Planning (ERP) project.; and Employee Lifecycle and Data management

A further 5 audits have been identified where Azets will endeavour to take account of the work performed by IA for their 2021/22 financial statements review. These are:

- 1. Covid-19 Thematic Lessons Learned
- 2. Records Management and Information Security with Focus on Remote Working
- 3. Management and Allocation of Covid-19 grant funding
- 4. Capital Budget Setting and Management
- 5. Employee Lifecycle and Data management

3.3.4 Internal Audit Annual Plan 2021 – 22

	Description here timing is specifically aligned to enable external audit to work with or take ac I risks have been mapped to the 11 strategic CLT risks included in the CLT risk				Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Council-Wide - 8	audits (including follow-up)						
	(1) Employee Wellbeing Review will focus on the actions implemented by the Council during Covid-19 to assess and support employee wellbeing, with focus on the actions implemented to address the themes identified from employee wellbeing surveys.		√		20	Covid-19 RMP 1; 3 CLT 4; 5; 9	Low
All relevant Council Directorates and Divisions.	(2) Records Management and Information Security Review of the design and effectiveness of processes implemented to support effective records management and information security following the implementation of home working, with focus on personal, sensitive, and paper based data and information.	✓			25	Covid-19 RMP 6 CLT 7	High
	(3) <u>Statutory Request and Complaints Processes</u> Review of the design and effectiveness of processes established to support statutory Freedom of Information and Subject Access Requests, and complaints processes.		~		30	Covid-19 RMP 9 CLT 8;10	Medium

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
	(4) Management and Allocation of Covid-19 Grant Funding Review of the design and effectiveness of processes established to support management and allocation of Covid-19 grant funding across the Council		✓			25	Covid-19 RMP Risk 7 CLT 2	High
	(5) Implementation of Historic Whistleblowing Recommendations Review of a sample of outcomes from historic whistleblowing recommendations to confirm that they have been effectively implemented and sustained. Note that this will include the full population of child protection whistleblowing recommendations.			√		30	Covid-19 RMP 1 CLT 4	Medium
	(6) <u>Day Care to Adult Social Care Transition Arrangements</u> Review of the design and effectiveness of processes established to support the transition from day care (Communities and Families) to adult social care (Health and Social Care) arrangements.				√	25	CLT 9; 11	Low
	(7) Application Technology Controls Review of the general (change management and access) and application (transaction processing) controls applied to technology applications hosted on Council networks and used to support service delivery.		✓			25	Covid-19 RMP 6 CLT 7; 9	High
	(8) Follow Up Ongoing follow up across all directorates and service areas to confirm that agreed management actions have been effectively implemented and sustained to support closure of IA findings raised.	√	√	✓	✓	625	N/A	Low

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Customer and Digital Services	(1) Cyber Security – Technology Vulnerability Management Review of the processes applied by CGI to design and implement solutions to address new and emerging technology vulnerabilities identified from vulnerability scanning performed across both the corporate and learning and teaching networks.		√			25	Covid-19 RMP 6 CLT 7; 9	Medium
Customer and Digital Services	(2) CGI Performance Reporting Review of the adequacy; completeness; and accuracy of technology service performance reporting provided by CGI to the Council, including the appropriateness of action taken to deal with any performance issues identified.			√		25	Covid-19 RMP 6 CLT 7;9	Medium
Customer and Digital Services	(3) Use of the Verint CRM System to Support Recording and Remediation of Citizen Complaints and Queries Review of the design and effectiveness of the new citizen complaints and queries process following implementation of the Verint customer relationship management system. The review will include review of relevant system controls; capacity; and resilience arrangements.				✓	25	Covid-19 RMP 6 CLT 7; 9	Medium
Finance	(4) * Capital Budget Setting and Management Review of the design and effectiveness of capital budget setting and management processes applied across the Council.				✓	25	Covid-19 RMP 7 CLT 2	High
Finance	(5) Payment Card Industry Data Security Standard Compliance (PCI DSS) Review of the adequacy and effectiveness of the key controls established to ensure ongoing compliance with PCI DSS requirements designed to protect cardholder data that is processed, transmitted and stored by the Council.					25	Covid-19 RMP 6; 10 CLT 7; 9; 10	High

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
	(6) * Employee Lifecycle Data and Compensation and Benefits Processes							
Customer and Digital Services	Review of the key controls established to ensure the completeness and accuracy of employee lifecycle data and payroll calculations; and the accuracy of reconciliations between the Council's payroll and general ledger.			✓		20	Covid-19 RMP 9 CLT 2; 9;	High
	Data analytics will be used to analyse payroll data for the financial year 1 April 2020 to 31 March 2021.						10	
Human Resources	(7) <u>Design of Scottish Local Government Living Wage Requirements</u> Review of the Council's design of the Scottish Local Government Living Wage requirements prior to implementation	√				20	Covid-19 RMP 6; 9; CLT 3;7; 9; 10; 11	Low
Property and Facilities Management	(8) Repairs and Maintenance Framework Review of the design of the new repairs and maintenance framework for Council operational properties prior to implementation.				✓	25	CLT 2; 4; 6; 9	Medium
Strategy and Cor	nmunications – 4 audits							
Resilience	(1) *Covid-19 Thematic Lessons Learned Review of the design and effectiveness of the processes applied to collate Covid- 19 lessons learned across the Council and ensure that they are incorporated into future resilience plans.			✓		25	CLT 5	Low

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Democracy	(2) Elections Review of the design of the May 2021 elections process in the Covid-19 environment to confirm compliance with relevant Scottish Government and Public Health Scotland requirements and guidance.	✓				20	Covid-19 RMP 1; 9 CLT 4; 9; 10; 11	Low
Strategic Change and Delivery	(3) *Planning and Performance Framework Ongoing agile review of the design and implementation of the new planning and performance framework.	✓			√	25	CLT 1; 8; 9	Low
Policy and Insight	(4) Council Emissions Plan Review of the framework designed to support implementation of the Council Emissions Plan prior to implementation				✓	25	CLT 1; 2; 3	Low
Communities and	Families – 4 audits							
Schools and Lifelong Learning	(1) Technology Availability in Schools Review of the design and effectiveness of processes established to confirm the adequacy and support distribution of technology equipment to pupils to support remote learning during lockdown.		✓			25	Covid-19 RMP 6 CLT 7; 8; 9	Medium
Schools and Lifelong Learning with support from Customer and Digital Services	(2) Availability of Early Years Education and Alignment with the Poverty Strategy Review of the strategy to support expansion of the early years education programme and its alignment with the Council's poverty strategy. Review will also consider the design and effectiveness of processes to established to support allocation of places in line with eligibility criteria, and the Council's oversight of early years private partner providers.			√		25	CLT Covid- 19 RMP 7 1; 2; 3; 6; 8; 9; 10; 11	Medium

ectiveness of the processes established to support ommunity in line with applicable court orders and ase from custody; and preparation and submission of							(H/M/L)
I and Parole Board to support decisions in relation to early prison release.				✓	25	Covid-19 RMP 9 CLT 9; 10; 11	High
(4) Implementation of Child Protection Recommendations Review of a sample of closed child protection investigations to confirm that recommendations made have been effectively implemented and sustained.						CLT 4; 8; 9; 10; 11	Medium
tainability ied to confirm the ongoing financial sustainability of , and the design and appropriateness of proposed address any significant gaps identified.		√			25	CLT 1; 2; 6	Low
(2) <u>Transformation and benefits realisation</u> Review of transformation progress and benefits delivery. The audit will also consider how the impacts of Covid-19 have been reflected in transformation delivery timeframes and expected benefits.					25	CLT 2; 3	Low
	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation	, and the design and appropriateness of proposed address any significant gaps identified. its realisation gress and benefits delivery. The audit will also Covid-19 have been reflected in transformation

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Place	(1) Health and Safety of Outdoor Infrastructure						CLT 4: 6: 0:	
Management	Review of the design of effectiveness of processes established to ensure the health and safety of outdoor infrastructure (for example walls; railings; paths; and equipment in children's public play areas) owned and managed by the Council.		✓			30	CLT 4; 6; 9; 10; 11	Low
Place Management – Scientific Services	(2) Food and Water Testing Review of the design and effectiveness of the processes established to support food and water testing performed by scientific services in line with applicable Foods Standard Scotland and Environmental Health legislation, regulations and guidance.			√		30	CLT 4; 9; 10; 11	High
Place Management	(3) Planning Review of the design and effectiveness of processes applied to support review and decisions in relation to householder applications and use of the Uniform technology application.	√				25	CLT 7; 9; 10; 11	High
Place Management	(4) Council Housing Allocation Process Review of the use of the Edindex system to support registration; prioritisation; and allocation of Council housing requests.		✓			25	CLT 7; 8; 9; 10; 11	High
Place Management	(5) Housing Property Services Repairs Management Review of the design and effectiveness of processes applied by Housing Property Services to support prioritisation of urgent repairs during Covid-19, and prioritisation and resolution of non-urgent repair backlogs that accumulated during lockdown.			√		25	CLT 4; 6; 8; 9; 10; 11	High

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Place Management	(6) Port Facility Security Plan Annual review of existence and operation of the Port Facility Security Plan as per Department for Transport requirements.		✓			20	CLT 4;10; 11	High
Place Management	(7) Transfer of the Management Development Funds Grant Annual review of the key controls supporting the transfer of the management of development funding from the Council to registered social landlords in line with Scottish Government requirements specified in their annual offer letter.		✓			20	CLT 2; 6; 9; 10	Low
Major Projects –	3 audits		•	•	•			
Place	(1) <u>Trams to Newhaven</u> Ongoing agile review of project governance; procurement; and gateway decisioning and payments. The audit will include ongoing assessment of the ongoing controls supporting the funding model. Project management will be assessed against published best practice from HM Treasury Green; Scottish Transport; the National Audit Office; and Audit Scotland. The review will also consider whether the lessons learned from the Tram Inquiry have been considered and applied.	√	✓	✓	✓	80	CLT 1; 2; 3; 4;7	Medium
Resources	(2) Enterprise Resource Planning System Implementation Ongoing agile review of the project management and governance arrangements supporting implementation of the enterprise resource planning system.	✓	✓	✓	✓	80		Medium

Auditable Area	Description	Q1	Q2	Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
Council Wide	(3) Adaptation and Renewal Programme Governance and Deliverables Ongoing agile review of the design of key Adaptation and Renewal Programme deliverables prior to implementation.		✓		✓	35		Low
Other Organisation	ns – 10 audits	,						
LVJB	Lothian Valuation Joint Board - provision of internal audit services				✓	25	N/A	N/A
SEStran	SEStran - provision of internal audit services			✓		20	N/A	N/A
Royal Edinburgh Military Tattoo	Tattoo - provision of internal audit services				✓	20	N/A	N/A
Edinburgh					✓	25		
Integration Joint Board	EIJB – provision of internal audit services			✓		25	N/A	N/A
Board					✓	25	1	
				✓		20	N/A	Medium
Investment and Pensions –	Four planned reviews for Lothian Pension Fund (LPF)				✓	20		
Lothian Pension	The scope of these reviews has been agreed with LPF and was included in the LPF annual audit plan to be presented to the Pensions Audit Committee in March 2021.		✓			25		
Fund	armaar addit plan to be presented to the recisions / tadit committee in Maron 2021.	✓				25		
Miscellaneous – Internal Audit activities								
Internal Audit	Internal and External Audit Quality Assurance				✓	20	N/A	N/A
Internal Audit	Training			✓	✓	5	N/A	N/A

Auditable Area	e Area Description				Q3	Q4	Audit Days	Link to CLT Risk/ COVID RMP Risk	Fraud (H/M/L)
		Total audits and plan days for the Council	36 audits 1,615 audit days						
		Total audits and plan days for other organisations			10 a	udits	230 audit days		
		Total audits and plan days included in the 2021/22 annual plan	46 audits			udits	1,845 audit days		
		Plan days on Internal Audit Quality Assurance and Training	2 activities 25 days						
		Total audits and plan days (including IA activities)	48 1,870 audit days						

Appendix 1: Detailed methodology

1. Original and current risk assessment process

The internal audit plan should focus on the highest risk areas of the Council. Consequently, each auditable area is allocated an original risk rating that considers the impact of the range of original risks that they are exposed to, should they crystallise, and the likelihood that these risks will crystallise.

The criteria used to assess impact and likelihood are included at Appendix 2.

			Lik	elihood Ratin	g	
		1	2	3	4	5
	5	Medium	Medium	High	High	Critical
	4	Low	Medium	Medium	High	High
Impact Rating	3	Low	Low	Medium	Medium	High
	2	Low	Low	Low	Medium	Medium
	1	Low	Low	Low	Low	Low

Risk Assessme	ent Outcomes
Low	It is unlikely that risks will become issues. If the risks do become issues, it is likely that they will only have a minor impact on the Council's objectives performance; and service delivery
Medium	There is a moderate likelihood that risks will become issues. If the risks do become issues, it is likely that they will have a moderate impact on the Council's objectives performance; and service delivery
High	There is a strong likelihood that risks will become issues. If the risks do become issues, it is likely that they will only have a significant impact on the Council's objectives performance; and service delivery
Critical	It is likely that risks will become issues. If the risks do become issues, it is likely that they will have a significant adverse impact on the Council's objectives performance; and service delivery

2. Control environment assessment

The strength of the control environment within each auditable area is assessed using the descriptions detailed in the table below.

This is assessment is based on:

- Revisiting the outcomes from previous internal audits, including the current open and overdue IA recommendations position;
- The current open and overdue findings position for each area;
- Consultation with Senior Management; GRBV Committee members; and political groups.
- Considering the outcomes of the 2nd and 3rd line of defence oversight and assurance providers.

Control Environm	ent Assessment Definitions
Effective	 The control environment and governance and risk management frameworks have been adequately designed and are operating effectively, providing assurance that risks are being effectively managed, and the Council's objectives should be achieved. The majority of assurance outcomes in this area have been assessed as 'effective', or 'some improvement required', with no 'significant improvement required' or 'critical' outcomes. The area has no overdue assurance actions that have not been implemented.
Some improvement required	 Whilst some control weaknesses are evident in the design and / or effectiveness of the control environment and / or governance and risk management frameworks, they provide reasonable assurance that risks are being managed, and the Council's objectives should be achieved The majority of assurance outcomes in this area have been assessed as either 'effective', or 'some improvement required', with no or few 'some improvement required' outcomes, and no 'critical' outcomes. The area has some overdue assurance actions that are not significant (rated either
	'low' or 'medium' and none that are more than six months overdue.
Significant improvement required	 Significant and / or numerous control weaknesses are evident in the design and / or effectiveness of the control environment and / or governance and risk management frameworks. Consequently, only limited assurance can be provided that risks are being managed and that the Council's objectives should be achieved. The majority of assurance outcomes in this area have been assessed as 'significant'
required	 improvement required', or 'some improvement required', with no 'critical' outcomes. The area has a number of significant (High and Medium) overdue assurance actions that are more than six months overdue.
Inadequate	 The design and / or operating effectiveness of the control environment and / or governance and risk management frameworks is inadequate, with a number of significant and systemic control weaknesses identified, resulting in substantial risk of operational failure and the strong likelihood that the Council's objectives will not be achieved.
	 The majority of recent assurance outcomes in this area have been assessed as 'significant improvement required', with at least one 'critical' outcome. The area has a number of significant (Critical and High) overdue assurance actions that are more than one year overdue.

3. Audit requirement rating

The original risk and the control environment ratings are then used to calculate the audit requirement rating. Is approach ensures that audit work is focused on high risk areas where controls may not be adequately designed and / or operating effectively.

		Control Environment Assessment								
		Inadequate	Significant Improvement Required	Some Improvement Required	Effective					
	Critical	1	1	2	3					
Risk	High	1	2	3	4					
Assessment Outcomes	Medium	2	3	4	5					
	Low	3	4	5	5					

4. Key to frequency of audit work

Audit Requirement Rating	Frequency	
1	Annual	
2	Every two years	
3	Every three years	
4	Every four years	
5 Every five years		

Appendix 2 – Original and Current Risk assessment criteria

We determine original (pre controls) risk as a function of the estimated **impact** and **likelihood** for each auditable area across the Council as detailed below:

Impact rating	Assessment rationale: The area is exposed to a range of risks that could have the following impacts on the Council:	
5	Critical impact on operational performance; or Critical monetary or financial statement impact; or Critical breach in laws and regulations and / or delivery of statutory requirements that could result in material fines or consequences; or Critical impact on the reputation/brand of the Council which could threaten its future viability.	
4	Major impact on operational performance; or Major monetary or financial statement impact; or Major breach in laws and regulations and / or delivery of statutory requirements, resulting in significant fines and consequences; or Major impact on the reputation or brand of the Council.	
3	Moderate impact on the Council's operational performance; or Moderate monetary or financial statement impact; or Moderate breach in laws and regulations and / or delivery of statutory requirements with moderate consequences; or Moderate impact on the reputation of the Council.	
2	Minor impact on the Council's operational performance; or Minor monetary or financial statement impact; or Minor breach in laws and regulations and / or delivery of statutory requirements with limited consequences; or Minor impact on the reputation of the Council.	
1	Insignificant impact on the Council's operational performance; or Insignificant monetary or financial statement impact; or Insignificant breach in laws and regulations and / or delivery of statutory requirements with little consequence; or Insignificant impact on the reputation of the Council.	

Likelihood rating	Assessment rationale
5	Has occurred or is likely to occur in the near future
4	Possible in the next 12 months
3	Possible in the medium term (2-5 years)
2	Possible in the longer term (5-10 years)
1	Unlikely in the foreseeable future

Appendix 3 – Reserve List of Audits for the IA Plan

Directorate	Division	Proposed Audit
Council Wide	All divisions	Council Purchase / Pre Paid Cards
		Disciplinary Policy and Processes
		Enhanced / Intensive Housing Benefit
		Management and Application of Standing Orders and Scheme of Delegations
Communities and Families	Schools and	Community Centres Oversight and Engagement
	Lifelong Learning	Devolved Schools Governance and Oversight
	Community Safety	Community policing
	Legal and Risk	Corporate Health and Safety
Resources	Property and Facilities Management	Corporate Catering
	Customer and Digital Services	Website and Intranet Management
	Human Resources	Mandatory training
Chief Executive's Office	Strategy and Communications	Citizen Engagement - Included in March 2020 proposed plan
Place	Culture	Usher Hall ticketing system
	Place Development	Housing Property – Tenancy Management
Health and Social Care	Accommodation	Care Homes Follow Up - not completed in 2019/20 due to Covid-19
Major Projects	All divisions	Management and Delivery of Savings Projects