

Business Assurance and Risk Management

Core Financial Controls Audit Report - FINAL (Ref-23/06)

Auditors

Maggie Gibb, Head of Business Assurance (and Chief Internal Auditor)

Selina Harlock, Audit Manager

Alex Prestridge, Senior Auditor

Management Summary

Introduction

The audit of Core Financial Controls was undertaken as part of the 2022/2023 Internal Audit plan which was approved by the Overview and Audit Committee.

The Core Financial Controls Audit reviewed the Fire Authority's key financial processes, including Creditors, Debtors, General Ledger, Grant Income, Banking, VAT and Treasury Management processes. It is vital to the achievement of the Fire Authority's strategic objectives to ensure robust controls in place to enable good financial governance.

Audit Objective

Internal Audit's objectives for this audit were to provide an evaluation of, and an opinion on, the adequacy and effectiveness of the system of internal controls in place to manage and mitigate financial and non-financial risks to the system.

This serves as a contribution towards the overall opinion on the internal control system that the Chief Internal Auditor is required to provide annually. It also provides assurance to the Section 112 Officer that financial affairs are being properly administered.

Scope of work

The audit activity focussed on the following key risk areas identified in the processes relating to Core Financial Controls:

- Financial Control Framework
- Creditors
- Debtors
- Payroll
- General Ledger
- Grant Income
- Capital
- Banking and Reconciliations
- VAT
- Treasury Management

The audit considered the controls in place at the time of the audit only. Where appropriate, testing was undertaken using samples of transactions covering the period between December 2021 and November 2022. The implementation of management actions raised from previous audits was also reviewed as part of the audit.

Table 1: Overall Conclusion

Overall conclusion on the system of internal control being maintained

Substantial

RISK AREAS	AREA CONCLUSION	No. of High Priority Management Actions	No. of Medium Priority Management Actions	No. of Low Priority Management Actions
Financial Control Framework	Reasonable	0	0	1
Creditors	Reasonable	0	0	1
Debtors	Substantial	0	0	0
Payroll	Reasonable	0	0	1
General Ledger	Substantial	0	0	0
Grant Income	Substantial	0	0	0
Capital	Substantial	0	0	0
Banking and Reconciliations	Substantial	0	0	0
VAT	Substantial	0	0	0
Treasury Management	Substantial	0	0	0
		0	0	3

Appendix 1 defines the grading for each of the conclusions given.

Financial Control Framework

The Financial Regulations were updated in September 2019, reflecting current procurement limits, and were up to date. The Regulations detail requirements for all Fire Authority financial systems. These have been published, and the latest approved copies are available to staff on the Intranet.

The Financial Instructions were updated and approved in January 2018 and are available to staff on the BMKFA Intranet. They contain instructions for the effective operation of all financial systems within the Authority. They are reviewed and updated to reflect changes to the Finance system. However, we noted that these have not been reviewed for five years, whereas best practice suggests that they are reviewed regularly as well as when known changes are implemented (**Finding 2**).

We also reviewed the contract Standing Orders (CSOs). These were updated in December 2022 and include hyperlinks to procurement limits and relevant legislation, ensuring these remain up to date.

Process notes were reviewed for all key financial processes, confirming that they are up to date. A review of system users found that access to Integra (the Finance system), iTrent (the Payroll system) and Lloyds Link (the Banking system) is appropriately controlled. There is an adequate separation of duties required for transactions made within the systems.

Creditors

The Financial Instructions contain guidance on ordering, authorising, and receiving goods and services. The Financial Instructions reference the Financial Regulations and include regulations on separation of duties, procurement, and expenditure.

A list of users with access to Integra detailing the amounts they can authorise and tasks they can perform was obtained from Finance. Examination confirmed that all users have appropriate access according to their job role. Requests to amend approvers/Budget Holders are sent to Finance to action, with controls in place to ensure that adequate separation of duties is maintained.

Requisitioner roles can create requisitions and Budget Holders can authorise requisitions via workflows. Requisitions are then turned into a purchase order (POs) and sent to the supplier via email. System parameters on Integra force a separation of duties, meaning Integra does not allow the same user to raise and authorise a PO. When a PO is created, it workflows to the Budget Holder to approve. Depending on the amount, it is authorised by a senior member of the team (i.e. Director of Finance or Head of Service Development) in line with delegated approval limits. Integra does not allow staff to approve transactions higher in value than their assigned limit.

Examination of a sample of 25 supplier invoices paid between December 2021 and November 2022 found that:

- In all 25 cases, the invoice was authorised for payment in line with delegated approval limits. All demonstrated an adequate segregation of duties.
- In all 25 cases, the purchase order was raised before the date of the invoice.
- In all 25 cases, invoices were paid after a Goods Receipt Note had been input in Integra. The Finance Team confirmed that the System does not allow payment before goods receipting.

- In all 25 cases, the details on the invoice agreed with those on Integra.
- In all 25 cases, the invoice was paid within 30 days of the invoice date.
- In all 25 cases, the invoice was posted to the correct cost centre and GL codes.

A sample of six credit notes received between December 2021 and November 2022 was selected from the Purchase Ledger Transactions Report.

Examination established that:

- For all six credit notes reviewed, the credits were allocated to the correct supplier.
- In all six cases, the supplier matched that on the original invoice (where received) and PO.

Process notes for creating and amending suppliers were obtained. They detail roles and responsibilities for making changes and carrying out individual checks. The Finance Assistant confirmed that changes are made as a result of an email request. If the change involves a change of bank details, the Finance Assistant calls the supplier to confirm the changes to bank details.

An email to confirm that the change has been made is then sent to a Principal Accountant for final independent approval, with emails saved on Integra's supplier records.

Examination of a sample of five new vendors and four changes to existing records for the period between December 2021 November 2022 found no exceptions, with all new vendors and changes appropriately approved with an adequate separation of duties, and supporting documentation retained.

Examination of a sample of five weekly BACS runs for the period between December 2021 and November 2022 confirmed that:

- The total amount and the number of payments on the BACS submission matched those on the payment projection report in all cases.
- BACS control sheets were completed and signed off to indicate that the checker reviewed and completed all checks on all five BACS payments.
- The checker reviewed the payment projection report for duplicate payments and invoices. No duplicate payments were found.
- Payments over £10,000 were checked for accuracy and signed by Principal Accountant. No BACS processing date errors were noted in any of the five
 cases.

Examination of control account reconciliations completed from December 2021 to November 2022 confirmed that control accounts are reconciled monthly and were subject to review and approval from an independent officer.

The Financial Instructions include guidelines for the appropriate use of purchasing cards. Also, a Purchasing Card User Guide is in place, outlining the Purchasing Card Holder's responsibilities regarding how to use the purchasing card, reconciling the monthly statements and general usage guidelines.

A list of cardholders, along with their agreed monthly spending limit, was obtained. This list showed that 62 staff hold Purchasing Cards, with 61 of these having been activated. 60 cardholders used their purchasing cards between 1 December 2021 and 30 November 2022. Of these, one did not appear on the list of purchasing card holders. Discussion and review of a list of recent leavers confirmed that this was due to them leaving the Fire Authority's employment. Review of transactions for the period found that no purchases were made using the card after their leave date.

A log of Purchasing Card transactions is maintained on Integra. This includes a description of the purchases made, a record of review and authorisation by the card holder's line manager and attached receipts. Examination of a sample of 20 Purchasing Card transactions posted on Integra between December 2021 and November 2022 found:

- In all 20 cases, a valid proof of purchase was retained.
- In all 20 cases, the amount on the receipt matched that on the bank statement and that recorded on Integra.
- In all 20 cases, use of the card was in line with the Financial Instructions and Purchasing Card User Guide.
- In 12 cases, purchases were made within the cardholder's designated spending limit. In six cases, total spend for the month of the transaction was not within the cardholder's monthly spending imit. In one of these cases, a single purchase of £2,248 exceeded the cardholder's spending limit of £1,000. In all six cases, a temporary increase to the cardholder's spend limit was approved by the line manager then actioned by Finance. For the remaining two transactions (both made by the same cardholder), the cardholder was not included on the list of purchasing card holders provided as they had left the Fire Authority's employment. However, we confirmed that no purchases were made using the card following the employee's leave date. Analysis of all Purchasing Card transactions by cardholder, found 16 instances where monthly spend was higher than the designated spend limit in the period between 1 December 2021 and 30 November 2022. Discussion with the Principal Accountant agreed that Purchasing Card limits are in need of review and that the purchasing card limits by organisational role set out in the Purchasing Card User Guide should also be reviewed to take into account positions and limits not previously listed (Finding 1).

Debtors

Financial Instructions include guidance for the Accounts Receivable functions. Documented procedures for Debtors processes and how these are actioned on Integra were obtained. They were found to be up to date and available to staff in the shared area. We confirmed that access to set up customers is restricted to members of the Finance team.

A report of invoices raised between December 2021 and November 2022 was obtained from the Principal Accountant. There were 290 invoices raised over the period.

Examination of a sample of 25 debtor invoices raised on Integra between December 2021 and November 2022 found:

- In all 25 cases, the invoice had been booked to an appropriate budget and General Ledger code.
- Where purchase orders would be expected, these were viewed, and details agreed to the corresponding invoice.
- In all 25 cases, invoices were confirmed as having been input by Finance staff with adequate separation of duties.
- In 16 cases, the invoice was paid within the Fire Authority's payment term of 14 days. In nine cases the invoice had not been paid within 14 days, although all nine had evidence of chasing.

A report of Credit Notes was run from Integra listing six credit notes raised between December 2021 and November 2022. Testing found that:

• In all six cases, the credit note was raised against the correct customer account and budget code.

In all six cases, the amount and customer match those on the original invoice.

The Debt Management Control Data file includes a summary of outstanding debts, invoice amounts; and provides measurements against Debtors KPIs. The reconciliation and recording of control data are completed monthly. As of October 2022, there was a total of £253,379 outstanding debt owed to the Authority, of which £246,312.43 was over 60 days old. Of this, £239,263 related to SCAS rental, Buckinghamshire Council, National Trust and Babcock International. We noted the Authority's debt profile had increased significantly over the period from December 2021, when there were total debts outstanding of £59,041.05. We confirmed that all debt was being chased in line with the Fire Authority's debt recovery process. It was confirmed that there were no write-offs for 2021/22. The outstanding invoice of £239,263 relating to SCAS rental has since been settled on 06 February 2023.

Payroll

Payroll information is processed through the iTrent system. The Fire Service Rota (FSR) planning and scheduling system is used to record all Watch-based inputs.

Examination of a sample of ten new starters for the December 2021 to November 2022 period confirmed that:

- In all cases, the payroll details were correctly entered on iTrent with an adequate separation of duties. The appropriate authorisations were obtained.
- In nine cases, a new starter checklist was completed. In one case, a new starter checklist was not completed. Further investigation found that the employee's start and end date were the same, with a leaver notification received before the start date and before Payroll would have started processing the new starter. This was therefore not deemed to be an issue.

Examination of a sample of ten permanent changes made to payroll between December 2021 and November 2022 found:

- In all ten cases, authorisation for the change was held on file.
- In all ten cases, the change matched the employee's information on iTrent.
- In six cases, there was evidence that the Change Control Form and change in iTrent were checked by a second officer. In four cases, there was no evidence of a check by a second officer (**Finding 3**).

An up to date Expenses Policy was in place, providing guidance to officers around claiming expenses and mileage. Examination of a sample of 20 expenses and mileage payments made to staff between December 2021 and November 2022 found no exceptions.

Examination of a sample of ten overtime payments made to staff between December 2021 and November 2022 found:

- In all ten cases, a claim form was completed either via iTrent's ESS module or via FSR and approved by the employee's line manager.
- In all ten cases, the overtime paid on the employee's payslip matched the claim form and amount accounted for on Integra.
- In all ten cases, the overtime was paid in the month the claim was authorised.

Examination of a sample of ten employees who left the Fire Authority's employment between December 2021 and November 2022 found:

- In all ten cases, leaver notification was received prior to the employees leave date.
- We confirmed by viewing iTrent via the Payroll Managers screen that in all ten cases recurring payments were deleted.
- In all ten cases, a leaver form was completed.
- In six cases, a payroll leaver's checklist was completed and checked by a second officer. However, in four cases there was no evidence on the checklist that a second check was carried out (**Finding 3**).

General Ledger

Staff are allocated to a 'role' on Integra to ensure adequate separation of duties within the financial processes. Staff cannot access transactions that are not appropriate for their role, for example, setting up new cost centres or cost codes.

A total of 149 journals were raised between December 2021 and November 2022. Examination of a sample of 20 journals found that:

- In all 20 cases, journals were entered and authorised with an adequate segregation of duties.
- All journals were found to agree to backing documentation.

Grant Income

We reviewed schedules of expected grant income for 2022/23 provided to the Fire Authority by the authorities and Government departments awarding them. We noted that a schedule of payments was provided by Buckinghamshire Council for 2022/23, showing a total Council Tax precept payment of £16,166,750.20.

Expected grants for 2022/23 were the Services Grant, BRRS (Business Rates Relief Reimbursement), RSG (Revenue Support Grant), Fire Pensions Grant, Protection Grant, New Dimensions Grant, Firelink Grant and the agreed 2022/23 Council Tax Precept from both Buckinghamshire Council and Milton Keynes Council.

Examination of a sample of five expected grant payments found the following:

- In all five cases, the income expected was received on the expected date.
- In all five cases, the amount received as shown on the bank statement and Integra agrees with the schedule.
- In all five cases, there were no conditions listed in the Grant Determination Letter/agreement that applied to BMKFA.
- The grant income was allocated to the correct cost centre/GL account on Integra in all five cases.

Capital

The Capital Programme for 2022-23 to 2026/27 was approved as part of the MTFP at the Executive Committee meeting on 9 February 2022 and Fire Authority on 16 February 2022. The agreed capital budget for 2022/23 was £2,426,000, with an approved revised budget of £3,939,500 as at October 2022.

Assets are valued annually by Bruton Knowles. A copy of the valuation report produced in March 2022 was obtained. Five land and building assets were selected from the valuation report and searched for in the asset register. Of these five sites, the up to date valuation was included in the Asset Register in all five cases.

Disposals for 2021/22 totalled £276,380, as per the Asset Register. This included £7,400 of Red Fleet disposals, £100,756 of White Fleet disposals and £168,224 of plant and equipment disposals. There were no recorded land or building disposals for 2021/22. We found that all disposals were appropriately approved.

Banking and Reconciliations

Bank reconciliations are undertaken monthly, and a report is run from Integra which lists any discrepancies. Review of the Control Accounts Reconciliation spreadsheet confirmed that the Bank Control Account Reconciliations are reviewed and signed off by the Principal Accountant monthly.

Access to the bank account via Lloyds Link is restricted to the Director of Finance and Assets, Principal Accountants, and key finance staff members. Levels of access differ depending on staff members' roles, with users requesting a system's role. The Principal Accountant authorises requests. Bank statements are produced from Lloyds Link and entries are matched to creditor and debtor transactions on Integra.

The Finance Assistant confirmed that transactions are manually matched as part of the reconciliation process. Bank statements are exported and uploaded into Integra and receipts, and payments are lodged weekly.

We selected a sample of five payments from bank statements for April, August, June, October, and September 2022. In all five cases, we found that the creditor and payment amount matched that listed on Integra.

We also selected a sample of five income transactions recorded on bank statements. We found that the bank statement was exported and uploaded correctly into Integra; receipts were lodged against the appropriate debtor on both the bank statement and Integra; receipts on the bank statement match those on Integra; and receipts have posted against the bank control account.

VAT

A review of the VAT returns report generated from Integra covering the period between April and October 2022 confirmed that the reconciliation for these was reviewed and agreed to each month's sales ledger and Purchase Ledger VAT amounts. These were then agreed to the control account.

A walkthrough of the process was viewed during the preparation and authorisation of the returns for September and October 2022. For both months, the Finance Assistant created the report, which was checked and authorised by the Principal Accountant and submitted to HMRC using unique log-in details.

Treasury Management

The Treasury Management Strategy for 2022-23 was approved at the Fire Authority meeting on 16 February 2022. The Strategy refers to CIPFA best practice and guidance on prudential investments and DLUHC guidance. The minimum acceptable credit quality of counterparties for inclusion on the lending list is defined

as per CIPFA guidelines for Police and Fire Authorities. Counterparties are agreed as part of the Treasury Management Strategy and are based on the advice received from the contracted treasury advisors.

Link Treasury Services provide regular weekly updates of credit ratings for counterparties to BMKFA and a monthly Investment Analysis Review. We confirmed that there is a signed contract with Link Treasury Services for Treasury Management Advisory services. In line with the terms and conditions as well as the Contract Standing Orders, the contract with Link Treasury Services which was due to expire in March 2022, was extended to 31 March 2024.

Management reports are produced quarterly by the Principal Accountant and presented to the Overview and Audit Committee. For 2022-23 Quarter 2, the report showed that the accrued interest earned for the first half of 2022-23 was £83k, which was £68k higher than the budgeted amount of £15k for the same period.

A report was obtained of deals executed between 1 April 2022 and 30 November 2022 from Treasury Live. This shows all investment deals made, matured investments, and movements in money market funds (MMF). There were 23 Fixed deals, seven MMF deals and nine call deals made over this period. No exceptions were noted, with no counterparty limits having been breached.

Table 2: Detailed Audit Findings and Management Action Plan

Finding 1: Creditors – Purchasing card spending limits		Agreed Management Actions
Purchasing card holders are assigned a monthly spending limit in line with the requirements of their role. These should be periodically reviewed to ensure that they continue to be in line with the requirements of officers' roles. Examination of a sample of 20 purchasing card transactions found: • In six cases, total spend for the month of the transactions was not within the cardholder's monthly spending limit. In one of these cases, a single purchase of £2,248 exceeded the cardholder's spending limit of £1,000. Whilst a temporary increase to the cardholders' spend limit was approved by the budget holder and actioned by Finance in all six cases, and all spend was within the temporary increase to the limit, analysis of all Purchasing Card transactions found 16 instances (spread across ten cardholders) where monthly spend was higher than the designated spend limit in the period between 1 December 2021 and 30 November 2022, indicating that the officers were exceeding their limits with relative frequency. Discussion with the Principal Accountant agreed that Purchasing Card limits are in need of review and that the purchasing card limits by organisational role set out in the Purchasing Card User Guide should also be reviewed to take into account positions and limits not previously listed. If purchasing card spend limits do not reflect actual purchasing card spend, there is a risk that temporary increases to spend limits become increasingly frequent, leading to inconsistent purchasing card usage across the Fire Authority.	L	Action: A Review of the Purchasing Card User Guide to ensure the guide is still fit for purposes and purchasing card limits are sufficient and appropriate for all purchasing card holders. Officer responsible: Principal Accountant Date to be implemented by: 30 June 2023
Finding 2: Financial Control Framework – Financial Instructions	Risk Rating	Agreed Management Actions
Financial Instructions should cover all financial processes, be up to date, approved and made available to staff. We noted that the Financial Instructions document was last updated and approved in January 2018 and has therefore not been reviewed for five years, whereas best practice suggests that financial policies and procedures are reviewed regularly as well as when known changes are implemented.	L	Action: A review and update of the Financial Instructions to take place to incorporate actions from the Procurement Audit. Officer responsible:

If Financial Instructions are not kept under regular review there is a risk that they are not up to date and do not reflect the current operations and strategic objectives of the Fire Authority, as well as any changes to legislation.		Director of Finance and Assets Date to be implemented by: 31 March 2023
Finding 3: Payroll – Second officer check	Risk Rating	Agreed Management Actions
Information relating to permanent changes and leavers should be input by an HR or Payroll Officer and checked by a second Payroll Officer.	L	Action: As the team is now at full establishment and
Examination of a sample of ten permanent changes made to payroll between December 2021 and November 2022 found that in four cases, there was no evidence that inputs relating to the change were checked by a second officer.		trained, these checks are taking place. Officers responsible: Payroll Manager
Examination of a sample of ten employees who left the Fire Authority's employment between December 2021 and November 2022 found that in four cases there was no evidence on the checklist that a second check was carried out.		Date to be implemented by: Immediately
If inputs into Integra are not checked by a second officer, there is a risk that permanent changes and leavers are processed incorrectly and the pay information is not accurate, leading to an overpayment or underpayment.		

Appendix 1: Definition of Conclusions

Key for the Overall Conclusion:

Below are the definitions for the overall conclusion on the system of internal control being maintained.

Definition		Rating Reason	
Substantial	A sound system of governance, risk management and control exist, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.	The controls tested are being consistently applied and risks are being effectively managed. Actions are of an advisory nature in context of the systems, operating controls and management of risks. Some medium priority matters may also be present.	
Reasonable	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.	Generally good systems of internal control are found to be in place but there are some areas where controls are not effectively applied and/or not sufficiently developed. Majority of actions are of medium priority but some high priority actions may be present.	
Limited	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.	There is an inadequate level of internal control in place and/or controls are not being operated effectively and consistently. Actions may include high and medium priority matters to be addressed.	
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.	The internal control is generally weak/does not exist. Significant non-compliance with basic controls which leaves the system open to error and/or abuse. Actions will include high priority matters to be actioned. Some medium priority matters may also be present.	

Management actions have been agreed to address control weakness identified during the exit meeting and agreement of the Internal Audit report. All management actions will be entered onto the Pentana Performance Management System and progress in implementing these actions will be tracked and reported to the Strategic Management Board and the Overview & Audit Committee.

We categorise our management actions according to their level of priority:

Action Priority	Definition	
High (H)	Action is considered essential to ensure that the organisation is not exposed to an unacceptable level of risk.	
Medium (M)	Action is considered necessary to avoid exposing the organisation to significant risk.	
Low (L)	Action is advised to enhance the system of control and avoid any minor risk exposure to the organisation.	

Appendix 2: Officers Interviewed

The following staff contributed to the outcome of the audit:

Name: Title:

Asif Hussain

Marcus Hussey

Laura Taylor

Deputy Director of Finance and Assets

Principal Accountant (Technical Accounting)

Principal Accountant (Management Accounting)

Jackie Vere-White Payroll Manager
Raheel Iqbal Finance Assistant

The Exit Meeting was attended by:

Name: Title:

Asif Hussain Deputy Director of Finance and Assets

Laura Taylor Principal Accountant (Management Accounting)
Marcus Hussey Principal Accountant (Technical Accounting)

Jackie Vere-White Payroll Manager

The auditors are grateful for the cooperation and assistance provided from all the management and staff who were involved in the audit. We would like to take this opportunity to thank them for their participation.

Appendix 3: Distribution List

Draft Report:

Marcus Hussey

Jackie Vere-White

Mark Hemming Director of Finance and Assets

Asif Hussain

Laura Taylor

Deputy Director of Finance and Assets
Principal Accountant (Management Acc

Principal Accountant (Management Accounting)
Principal Accountant (Technical Accounting)

Payroll Manager

Final Report as above plus:

Jason Thelwell Chief Fire Officer
Ernst and Young External Audit

Audit Control:

Closing Meeting 3 February 2022
Draft Report 8 February 2022
Management Responses 10 February 2022
Final Report 10 February 2022

Audit File Ref 23-06

Disclaimer

Any matters arising as a result of the audit are only those, which have been identified during the course of the work undertaken and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that could be made.

It is emphasised that the responsibility for the maintenance of a sound system of management control rests with management and that the work performed by Internal Audit Services on the internal control system should not be relied upon to identify all system weaknesses that may exist. However, audit procedures are designed so that any material weaknesses in management control have a reasonable chance of discovery. Effective implementation of management actions is important for the maintenance of a reliable management control system.

Contact Persons

Maggie Gibb, Head of Business Assurance

Phone: 01296 387327

Email: maggie.gibb@buckinghamshire.gov.uk

Selina Harlock, Audit Manager

Phone: 01296 383717

Email: selina.harlock@buckinghamshire.gov.uk