

**ORIGINATOR: TIAA (INTERNAL AUDITORS)**

**PAPER NO:**

**AC22/09**

**SUBMITTED TO: AUDIT COMMITTEE – 24 JUNE 2022**

**SUBJECT: INTERNAL AUDIT STRATEGY AND ANNUAL INTERNAL AUDIT PLAN 2022/23**

**SUMMARY:**

1. The report attached is the Indicative Audit Strategy 2022/25 and Annual Plan 2022/23

**RECOMMENDATION:**

1. The Audit Committee is requested to consider the attached report.



Police and Crime Commissioners for Norfolk and Suffolk and  
Chief Constables of Norfolk and Suffolk Constabularies

Indicative Audit Strategy 2022/25 and Annual Plan 2022/23

2022/23



March 2022

FINAL

## OVERVIEW

### Introduction

The Audit Plan for 2022/23 has been informed by a risk assessment carried out across our police clients and by an updated audit risk assessment to ensure that planned coverage for the year is focussed on the key audit risks, and that the coverage will enable a robust annual Head of Internal Audit Opinion to be provided.

### Key Emerging Themes

This year will continue to be another challenging year for police forces in terms of funding, managing additional recruitment and technological advancement. There are a number of operational issues that have also come to prominence; we have identified a number of key areas which require consideration when planning internal audit coverage.

**Vetting:** Recent events have highlighted some significant gaps in the vetting of police officers and has led to calls for the urgent re-vetting of all serving police officers. HMICFRS is reviewing whether police forces have implemented previous recommendations on vetting as part of its current round of routine inspections, as well as undertaking a thematic inspection of vetting and counter-corruption procedures.

**Firearms Licensing:** New statutory guidance aims to standardise the licensing procedures in police forces. The guidance requires background checks on every applicant and a home visit to be carried out for first-time applicants. Any applicant will have to arrange for information about their medical suitability to carry a gun to be provided by their GP.

**Recruitment:** The continued implementation of Operation Uplift, the Government's three-year national campaign to recruit 20,000 police officers, will require significant Human Resources, Training and Development and Workforce Planning input.

**Social Media:** Social media can be a very effective tool for communicating with the public and helping in fighting crime, however, its use needs to be carefully considered and managed to ensure compliance with professional standards and the Code of Ethics on both a professional and private basis.

### Providing Assurance during the COVID-19 pandemic

From the outset, we successfully transitioned to new and remote ways of working without any diminution of the service and we recognise that many if not all of our clients have had to implement changes in the way that they work. We continue to consider any gaps in control or exposures that have arisen as a result of this. Whilst many measures have largely been relaxed, it is not inconceivable that further measures might be implemented to stem any increases in cases. We continue to adopt a hybrid approach with a mix of remote and on-site working and tailor this approach to client requirements and the nature of each assignment.

### Adequacy of the planned audit coverage

The reviews identified in the audit plan for 2022/23 support the Head of Internal Audit's annual opinion on the overall adequacy and effectiveness of the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies framework of governance, risk management and control as required by TIAA's charter. The reviews have been identified from your assurance framework, risk registers and key emerging themes. The previous audit coverage has been included in Appendix C to provide a comprehensive view of Internal Audit activity.

# INTERNAL AUDIT PLAN

## Audit Strategy Methodology

We adopt a proprietary risk-based approach to determining your audit needs each year which includes reviewing your risk register and risk management framework, the regulatory framework, external audit recommendations and previous internal audit work for the organisation, together with key corporate documentation such as your business and corporate plan, standing orders, and financial regulations. For 2022/23, we have conducted an analysis of the key risks facing the sector and client base more broadly to inform our annual planning. The Audit Strategy is based predominantly on our understanding of the inherent risks facing the Police and Crime Commissioners for Norfolk and Suffolk and the Chief Constables of Norfolk and Suffolk Constabularies and those within the sector and has been developed with senior management and Committee. Our approach is based on the International Standards for the Professional Practice of Internal Auditing which have been developed by the Institute of Internal Auditors (IIA) and incorporate the Public Sector Internal Audit Standards (PSIAS).

## Risk Prioritisation

Each year an updated risk assessment is carried out to ensure the Audit Strategy remains fully aligned with the key risks facing the Police and Crime Commissioners for Norfolk and Suffolk and the Chief Constables of Norfolk and Suffolk Constabularies. We take in to account any emerging or heightened risks that are facing the sector and the Police and Crime Commissioners for Norfolk and Suffolk and the Chief Constables of Norfolk and Suffolk Constabularies specifically, to ensure that the work of internal audit remains appropriately focused. Links to specific strategic risks are also contained in the Internal Audit Strategy.

## Internal Audit Strategy and Plan

Following the risk prioritisation review, the Audit Strategy has been produced (Appendix A) and the Annual Plan (Appendix B) sets out the reviews that will be carried out, the planned times and the high-level scopes for each of these reviews.

The Annual Plan will be subject to ongoing review and could change as the risks change for the organisation and will be formally reviewed with senior management and the Joint Audit Committee mid-way through the financial year or should a significant issue arise.

The overall agreed time for the delivery of each assignment within the Annual Plan includes: research; preparation and issue of terms of reference; site work; production and review of working papers; and reporting.

The Annual Plan has been prepared on the assumption that the expected controls will be in place.

The total number of days required to deliver the Audit Plan is as agreed in the contract between TIAA and the Police and Crime Commissioners for Norfolk and Suffolk. This number of days is fixed and it is TIAA's responsibility to deliver the Audit Plan for this number of days. Where the Police and Crime Commissioners for Norfolk and Suffolk agrees additional work the required number of days and the aggregate day rate will be agreed in advance with the Chief Finance Officer/s and will be clearly set out in the terms of reference for the additional review(s).

## Release of Report

The table below sets out the history of this plan.

<b>Date plan issued:</b>	February 2022
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## APPENDIX A: ROLLING STRATEGIC PLAN

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
<b>Governance</b>						
Norfolk – OPCC Audit – Community Safety Partnership	Office of the Police Crime Commissioner Norfolk	Assurance	SR7	✓		
Performance Management	All	Assurance	SR7 & SR9 (Norfolk)	✓		
Commissioner’s Grants	Office of the Police Crime Commissioners	Assurance	VICTIMS	✓	✓	✓
Change Management Programme	All	Assurance	SR6 (Norfolk) & SSR6 (Suffolk)	✓		
Complaints	All	Assurance	GOV	✓		
OPCC Statutory Returns Health check	Office of the Police Crime Commissioners	Assurance	GOV		✓	
Business Interest, Secondary Employment and Declaration of Interest	All	Assurance	SR6 (Norfolk) & SSR2 (Suffolk)		✓	
Equality, Diversity and Inclusivity	All	Assurance	SR6 (Norfolk) & SSR5 (Suffolk)		✓	
Sustainability	All	Assurance	SR6 (Norfolk) & SSR6 (Suffolk)		✓	
Community Engagement	All	Assurance	SR1 (Norfolk) & SSR3 (Suffolk)			✓
Corporate and HR Policies	All	Assurance	SR6 (Norfolk) & SSR1 (Suffolk)			✓

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
Whistleblowing	All	Assurance	SR1 (Norfolk) & SSR4 (Suffolk)	✓		
<b>Risk</b>						
Risk Management	All	Assurance	SR6 (Norfolk) & SSR6 (Suffolk)	✓	✓	✓
Business Continuity	All	Assurance	SR6 (Norfolk) & SSR6 and SSR10 (Suffolk)		✓	
<b>Digital Assurance</b>						
ICT Strategy	All	Assurance	SR6 & SR8 (Norfolk) & SSR6 (Suffolk)	✓		
ICT Project Management – Support for New Projects	All	Assurance	SR6 & SR8 (Norfolk) & SSR6 (Suffolk)	✓		
Cyber Security	All	Assurance	SR6 & SR8 (Norfolk) & SSR6 (Suffolk)	✓	✓	✓
Use of Social Media	Constabularies and OPCC Suffolk	Assurance	SR6 & SR8 (Norfolk) & SSR6 (Suffolk)	✓		
<b>Finance</b>						
Key Financials	All	Assurance	SR7 (Norfolk) & SSR9 (Suffolk)	✓	✓	✓
Overtime and Additional Allowances	All	Assurance	SR7 (Norfolk) & SSR1 & SSR5 (Suffolk)	✓		
Local procurement compliance including waivers	All	Assurance	SR7 (Norfolk) & SSR9 (Suffolk)	✓		

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
Shared Services Transaction Centre	All	Assurance	SR6 & SR7 (Norfolk) & SSR6 (Suffolk)		✓	
Procurement strategy	All	Assurance	SR6 & SR7 (Norfolk) & SSR9 (Suffolk)		✓	
Local Procurement Compliance (including waivers)	All	Assurance	SR6 & SR7 (Norfolk) & SSR9 (Suffolk)		✓	
Payroll	All	Assurance	SR7 (Norfolk) & SSR5 (Suffolk)		✓	
OBB Process	All	Assurance	SR6 & SR7 (Norfolk) & SSR6 (Suffolk)		✓	
Accounts Payable	All	Assurance	SR7 (Norfolk) & SS79 (Suffolk)			✓
Capital Programme	All	Assurance	SR6 & SR7 (Norfolk) & SS79 (Suffolk)			✓
Pension administration	All	Assurance	SR7 (Norfolk) & SS79 (Suffolk)			✓
Treasury Management	Office of the Police and Crime Commissioners	Assurance	SR7 (Norfolk) & SS79 (Suffolk)			✓
<b>Operational Performance and Infrastructure</b>						
Firearms Licensing	Constabularies	Assurance	SR6 (Norfolk) & SSR4 (Suffolk)	✓		
Safeguarding (a different area of safeguarding to be subject to review every two years)	All	Assurance	SR1 & SR6 (Norfolk) & SSR4 (Suffolk)	✓		✓

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
Planned and Preventative Estate Maintenance	All	Assurance	SR6 (Norfolk) & SSR10 (Suffolk)		✓	
Fleet Management Strategy	Constabularies	Assurance	SR6 (Norfolk) & SSR1 (Suffolk)		✓	
ANPR Camera	Constabularies	Assurance	SR6 (Norfolk) & SSR1 & SSR6 (Suffolk)			✓
Body Worn Video	Constabularies	Assurance	SR6 (Norfolk) & SSR1 & SSR6 (Suffolk)			✓
Security of Seized Proceeds of Crime (Cash and Assets)	Constabularies	Assurance	SR1 (Norfolk) & SSR4 (Suffolk)	✓		
Data Protection / Freedom of Information	Constabularies and Suffolk OPCC	Assurance	SR9 (Norfolk) & SSR8 (Suffolk)	✓		
Data Quality	All	Assurance	SR9 (Norfolk) & SSR8 (Suffolk)	✓		
MOPI Compliance	Constabularies	Assurance	SR9 (Norfolk) & SSR8 (Suffolk)		✓	
<b>Workforce</b>						
Vetting	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)	✓		
Agile Working	All	Assurance	SR6 & SR8 (Norfolk) & SSR6 (Suffolk)	✓		
Workplace Health	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)	✓		

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
Resource Management Unit	Constabularies	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)	✓		
Succession Planning	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)	✓		
Absence Management	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)		✓	
Recruitment and Training	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)		✓	
HR Strategy	All	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)		✓	
Learning and Development	Constabularies	Assurance	SR1 & SR6 (Norfolk) & SSR1 & SSR5 (Suffolk)			✓
Grievance Reporting and Management	All	Assurance	SR1 & SR6 (Norfolk) SSR1 & SSR5 (Suffolk)			✓
Workforce Planning	Constabularies	Assurance	SR1 & SR6 (Norfolk) SSR1 & SSR5 (Suffolk)			✓
<b>Follow Up</b>						
Follow Up	All	Follow Up		✓	✓	✓
<b>Management and Planning</b>						
Annual Planning		Management		✓	✓	✓
Audit Committee Preparation and Attendance		Management		✓	✓	✓

Review Area	Entity	Type	Strategic Risk Register Reference(s)	2022/23	2023/24	2024/25
Annual Report		Management		✓	✓	✓
Audit Management		Management		✓	✓	✓
Total Days				<b>330</b>	<b>330</b>	<b>330</b>

## APPENDIX B: ANNUAL PLAN – 2022/23

Quarter	Review	Type	Days	High-level Scope	Prog Ref	Review Type
1	Norfolk – OPCC Audit – Community Safety Partnership	Assurance	12	The audit will review how successful embedding of the community safety partnership function has been and to ensure the service is achieving its objectives.	B000	Assurance
3	Performance Management	Assurance	12	The review will consider the way in which key performance data is collated to inform effective decision making, taking in to account the accuracy, integrity and consistency of data. The audit will focus on the new revised performance framework that is being implemented.	G016	Assurance
4	Commissioner’s Grants	Assurance	12	The audit will review the systems and controls in place for commissioning undertaken by the offices of the police and crime commissioners to ensure that this is operating effectively.	G022	Assurance
3	Change Management Programme	Assurance	12	The audit will review the systems and controls in place for management of the change management programme. The audit will be undertaken in conjunction with the ICT Project Management – Support for New Projects review.	C047	Assurance
1	Complaints	Assurance	12	The audit will review controls in place to ensure that complaints are investigated accordingly as per legislation.	G014	Assurance
2	Whistleblowing	Assurance	10	The audit will focus on the whistleblowing processes in place across the forces.	B000	Assurance
4	Risk Management	Assurance	10	This audit will cover the structures and processes put in place to ensure effective Risk Management across the organisation, including embedding risk, risk identification, and risk mitigation. The audit will review the Constabularies and the Police and Crime Commissioners approach to risk management.	G019	Assurance
3	ICT Strategy	Assurance	10	The objective of the review is to undertake a review of the new ICT strategy to establish if this is appropriate strategy in place and to ensure progress is being made in accordance with the ICT strategy.	I026	Digital Assurance
4	ICT Project Management – Support for New Projects	Assurance	12	The objective of the review is to undertake a review of the ICT Project Management function to establish if this is operating effectively. The audit will be undertaken in conjunction with the Change Management Programme review.	I030	Digital Assurance
2	Cyber Security	Assurance	12	The audit approach will consider the security management arrangements for the pro-active identification, prioritising and mitigating against cyber-threats.	I2022	Digital Assurance
2	Use of Social Media	Assurance	12	The audit will review the policies and procedures around the use of social media, training and compliance with those policies.	G034	Digital Assurance

Quarter	Review	Type	Days	High-level Scope	Prog Ref	Review Type
4	Key Financials	Assurance	20	The review considers the arrangements for key controls operating within the systems and Force Management Statements.	N2008	Assurance
2	Overtime and Additional Allowances	Assurance	14	The review will assess the controls in place to effectively manage, approve and monitor overtime and additional bonus and honorarium payments.	C2033	Assurance
2	Local procurement compliance including waivers	Assurance	12	The objective of the audit is to determine if there are effective controls in place over procurement at local level to ensure that they are complying with contract standing orders.	C045	Assurance
3	Firearms Licensing	Assurance	12	The review will consider the extent to which the new statutory guidance for licensing firearms has been adopted and complied with.	B000	Assurance
1	Safeguarding	Assurance	12	The objective of the audit is to determine if there are effective controls in place to meet statutory obligations in relation to protecting and safeguarding vulnerable people who they come into contact with.	B000	Assurance
3	Security of Seized Proceeds of Crime (Cash and Assets)	Assurance	12	The review will assess the effectiveness of controls for managing the recovery of seized property process for both Norfolk and Suffolk Constabularies.	B000	Assurance
3	Data Protection / Freedom of Information	Assurance	12	The review will assess the controls in place to meet statutory obligations in relation to data protection and compliance with freedom of information requests.	B000	Assurance
4	Data Quality	Assurance	12	The review will assess controls in place to ensure the accuracy and integrity of data.	I011	Assurance
2	Vetting	Assurance	14	The review will consider the extent to which vetting procedures have been strengthened in line with recent guidance and whether national recommendations in this area have been adopted and implemented. The review will also consider what controls are in place to ensure that business interest, secondary employment and any declarations of interests are considered when undertaking vetting.	G024	Assurance
3	Agile Working	Assurance	12	The review will assess the arrangements in place to facilitate agile working, including: the technology used to support these arrangements; the efficient use of space; the availability of staff for key meetings and on-site requirements and how management has oversight of who will be where and when; and the arrangements to ensure continued productivity.	B000	Assurance
1	Workplace Health	Assurance	14	To review the adequacy, effectiveness and efficiency of the workplace health system to establish if it is working effectively.	H2085	Assurance
2	Resource Management Unit	Assurance	12	The review considers the arrangements for the effectiveness of procedures for the resource management within the constabularies.	B000	Assurance

Quarter	Review	Type	Days	High-level Scope	Prog Ref	Review Type
3	Succession Planning	Assurance	14	The review considers the arrangements in place to ensure appropriate succession planning is undertaken in relation to both police officers and police staff.	H2085	Assurance
1 – 4	Follow-up	Follow up	12	Follow-up of implementation of agreed priorities one and two actions from audit reports, ensuring good progress for implementing recommendations, and providing reports to the Joint Audit Committees.		
1	Annual Planning	Management	1	Assessing the Police and Crime Commissioners’ and the Chief Constables’ annual audit needs.		
4	Annual Report	Management	1	Reporting on the overall conclusions and opinion based on the year’s audits and other information and providing input to the Annual Governance Statement.		
1 – 4	Audit Management	Management	18	This time includes: meeting client management, overseeing the audit plan, reporting and supporting the Joint Audit Committee, liaising with External Audit and Client briefings (including fraud alerts, fraud digests and committee briefings).		
<b>Total days</b>			<b>330</b>			

## APPENDIX C: PREVIOUS AUDITS

Review Area	2019/20	2020/2021	2021/2022
<b>Governance</b>			
Justice Services Review			✓
Transformation and Strategic Planning / Change			✓
Strategic Control and Corporate Governance		✓	
2020 Strategic Change Programme	✓		
2025 Strategic Change Programme	✓		
Collaborations		✓	
Performance Management		✓	
Commissioner's Grants	✓		✓
Corporate Health and Safety		✓	
Complaints	✓		
Corporate and HR Policies	✓		✓
<b>Risk</b>			
Risk Management	✓	✓	✓
Business Continuity			✓
Emergency Planning	✓		
<b>Digital Assurance</b>			
Website Content	✓		
Telematics	✓		
Software Licensing	✓		
GDPR/Data Protection	✓		
Information Management/Security OPCC	✓		
Systems – ERP / Enact / DMS / Chronicle interfaces			✓

Review Area	2019/20	2020/2021	2021/2022
Device Management		✓	
Digital World		✓	
<b>Finance</b>			
Key Financials	✓	✓	✓
Single Tender Actions	✓		
Shared Services Transaction Centre			✓
Overtime	✓		✓
Expenses and Additional Allowances	✓		
Local procurement compliance including waivers		✓	
Shared Services Transaction Centre			✓
Procurement strategy			✓
Payroll		✓	
Budgetary Control	✓		
OBB Process		✓	
Contract Management	✓		
Capital Programme			✓
Pension administration			✓
<b>Operational Performance and Infrastructure</b>			
Firearms Management	✓		
Dog Handling	✓		✓
Uniform Stores	✓		
Estate Maintenance	✓		
Transport Management - Maintenance, Repair, Disposal, Transport Stock			✓
Estates Strategy		✓	

Review Area	2019/20	2020/2021	2021/2022
ANPR Camera			✓
Security of Seized Proceeds of Crime (Cash and Assets)		✓	
Data Quality		✓	✓
MOPI Compliance		✓	
<b>Workforce</b>			
Equality Diversity and Inclusivity	✓		
Vetting		✓	
Establishment, Capacity, Recruitment and Retention			✓
PEQF		✓	✓
Workplace Health	✓		
Resource Management Unit			
Succession Planning		✓	
Absence Management including Limited Duties	✓		✓
Recruitment and Training		✓	
HR Strategy		✓	
Learning and Development		✓	
External Training Budget	✓		
Temporary Contracts	✓		

## APPENDIX D: INTERNAL AUDIT CHARTER

### The Need for a Charter

The Audit Charter formally defines internal audit's purpose, authority and responsibility. It establishes internal audit's position within the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies defines the scope of internal audit activities. The establishment of the Audit Charter is a requirement of the Public Sector Internal Audit Standards (PSIAS) and approval of the charter is the responsibility of the Audit Committee.

### The Role of Internal Audit

The main objective of the internal audit activity carried out by TIAA is to provide, in an economical, efficient and timely manner, an objective evaluation of, and opinion on, the overall adequacy and effectiveness of the framework of governance, risk management and control. TIAA is responsible for providing assurance to the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies' governing body (being the body with overall responsibility for the organisation) on the adequacy and effectiveness of the risk management, control and governance processes.

### Standards and Approach

TIAA's work will be performed with due professional care, in accordance with the requirements of the PSIAS and the IIA standards which are articulated in the International Professional Practices Framework (IPPF).

### Scope

All the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies activities fall within the remit of TIAA. TIAA may consider the adequacy of controls necessary to secure propriety, economy, efficiency and effectiveness in all areas. It will seek to confirm that the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies management has taken the necessary steps to achieve these objectives and manage the associated risks. It is not within the remit of TIAA to question the appropriateness of policy decisions; however, TIAA is required to examine the arrangements by which such decisions are made, monitored and reviewed.

TIAA may also conduct any special reviews requested by the board, Audit Committee or the nominated officer (being the post responsible for the day-to-day liaison with TIAA), provided such reviews do not compromise the audit service's objectivity or independence, or the achievement of the

approved audit plan.

### Access

TIAA has unrestricted access to all documents, records, assets, personnel and premises of the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies and is authorised to obtain such information and explanations as they consider necessary to form their opinion. The collection of data for this purpose will be carried out in a manner prescribed by TIAA's professional standards, Information Security and Information Governance policies.

### Independence

TIAA has no executive role, nor does it have any responsibility for the development, implementation or operation of systems; however, it may provide independent and objective advice on risk management, control, governance processes and related matters, subject to resource constraints. For day-to-day administrative purposes only, TIAA reports to a nominated officer within the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies and the reporting arrangements must take account of the nature of audit work undertaken. TIAA has a right of direct access to the chair of the board, the chair of the Audit Committees and the responsible accounting officer (being the post charged with financial responsibility).

To preserve the objectivity and impartiality of TIAA's professional judgement, responsibility for implementing audit recommendations rests with the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies' management.

### Conflict of Interest

Consultancy activities are only undertaken with distinct regard for potential conflict of interest. In this role we will act in an advisory capacity and the nature and scope of the work will be agreed in advance and strictly adhered to.

We are not aware of any conflicts of interest and should any arise we will manage them in line with TIAA's audit charter and internal policies, the PSIAS/IIA standards and the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies' requirements.

### Irregularities, Including Fraud and Corruption

TIAA will without delay report to the appropriate regulator, serious weaknesses, significant fraud, major accounting and other breakdowns subject to the requirements of the Proceeds of Crime Act 2002. TIAA will

be informed when evidence of potential irregularity, including fraud, corruption or any impropriety, is discovered so that TIAA can consider the adequacy of the relevant controls, evaluate the implication of the fraud on the risk management, control and governance processes and consider making recommendations as appropriate. The role of TIAA is not to investigate the irregularity unless commissioned to do so.

### Limitations and Responsibility

Substantive testing will only be carried out where a review assesses the internal controls to be providing 'limited' or 'no' assurance with the prior approval of the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies additional time will be required to carry out such testing. The Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies is responsible for taking appropriate action to establish whether any loss or impropriety has arisen as a result of the control weaknesses.

Internal controls can only provide reasonable and not absolute assurance against misstatement or loss. The limitations on assurance include the possibility of one or more of the following situations, control activities being circumvented by the collusion of two or more persons, human error, or the overriding of controls by management. Additionally, no assurance can be provided that the internal controls will continue to operate effectively in future periods or that the controls will be adequate to mitigate all significant risks that may arise in future.

The responsibility for a sound system of internal controls rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses that may exist. Neither should internal audit work be relied upon to identify all circumstances of fraud or irregularity, should there be any, although the audit procedures have been designed so that any material irregularity has a reasonable probability of discovery. Even sound systems of internal control may not be proof against collusive fraud.

Reliance will be placed on management to provide internal audit with full access to staff and to accounting records and transactions and to ensure the authenticity of these documents.

The matters raised in the audit reports will be only those that come to the attention of the auditor during the course of the internal audit reviews and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. The audit reports are prepared solely for management's use and are not prepared for any other purpose.

### Liaison with the External Auditor

We will liaise with the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies' External Auditor. Any matters in the areas included in the Annual Plan that are identified by the external auditor in their audit management letters will be included in the scope of the appropriate review.

### Reporting

**Assignment Reports:** A separate report will be prepared for each review carried out. Each report will be prepared in accordance with the arrangements contained in the Terms of Reference agreed with TIAA and which accord with the requirements of TIAA's audit charter and PSIAS/IIA standards.

**Progress Reports:** Progress reports will be prepared for each Audit Committee meeting. Each report will detail progress achieved to date against the agreed annual plan.

**Follow-Up Reports:** We will provide an independent assessment as to the extent that priority 1 and 2 recommendations have been implemented. Priority 3 recommendations are low-level/housekeeping in nature and it is expected that management will monitor and report on implementation as considered appropriate.

**Annual Report:** An Annual Report will be prepared for each year in accordance with the requirements set out in TIAA's audit charter and PSIAS/IIA standards. The Annual Report will include a summary opinion of the effectiveness of the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies' governance, risk management and operational control processes based on the work completed during the year.

**Other Briefings:** During the year Client Briefing Notes, Benchmarking and lessons learned digests will be provided. These are designed to keep the organisation abreast of in-year developments which may impact on the governance, risk and control assurance framework.

### Assurance Assessment Gradings

We use four levels of assurance assessments as set out below.

<b>Substantial Assurance</b>	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
<b>Reasonable Assurance</b>	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
<b>Limited Assurance</b>	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
<b>No Assurance</b>	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

### Data Protection

TIAA has policies, procedures and processes in place to comply with all associated regulation and legislation on information security, which is underpinned by mandatory annual awareness training for all staff. To carry out our role effectively, we need to obtain information that is reliable, relevant and sufficient to support our findings and recommendations. The collection of data, particularly sensitive personal data, is minimised and is not shared with unauthorised persons unless there is a valid and legal requirement to do so. We have clear policies on the retention of data and its appropriate, controlled disposal. TIAA has a fully robust Information Security Management System that meets all the requirements of ISO27001:2013.

### Quality Assurance

TIAA recognises the importance of Internal Audit being controlled at each stage to ensure that we deliver a consistent and efficient Internal Audit service that is fully compliant with professional standards and also the conditions of contract. We operate a comprehensive internal operational quality review process to ensure that all Internal Audit work is carried out in accordance with these standards. These quarterly reviews are part of our quality management system which has ISO 9001:2015 accreditation.

### Audit Committee Responsibility

It is the responsibility of the Police and Crime Commissioners for Norfolk and Suffolk and Chief Constables of Norfolk and Suffolk Constabularies to determine that the number of audit days to be provided and the planned audit coverage are sufficient to meet the Committee's requirements and the areas selected for review are appropriate to provide assurance against the key risks within the organisation.

By approving this document, the Audit Committee is also approving the Internal Audit Charter.

### Disclaimer

The matters raised in this planning report, along with those raised in our audit and annual reports, are only those that came to the attention of the auditor during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

### Performance Standards

The following Performance Targets will be used to measure the performance of internal audit in delivering the Annual Plan:

Performance Measure	Target
Completion of planned audits.	100%
Audits completed in time allocation.	100%
Draft report issued within 10 working days of exit meeting.	100%
Final report issued within 10 working days of receipt of responses.	100%
Compliance with TIAA's audit charter and PSIAS/IIA Standards.	100%