



REPORT TO: Audit and Governance Committee

MEETING DATE: 19 December 2023

BY: Service Manager – Internal Audit

SUBJECT: Internal Audit Report – December 2023

1 PURPOSE

1.1 To inform the Audit and Governance Committee of Internal Audit reports issued since the last meeting of the Committee, provide details of Internal Audit's follow-up work undertaken and provide an update on progress made against the 2023/24 annual audit plan.

2 RECOMMENDATION

- 2.1 That the Audit and Governance Committee note:
 - i. the main findings and recommendations from the Internal Audit reports issued during the period from October 2023 to December 2023 as contained in Appendix 1;
 - ii. the findings from Internal Audit's follow-up work, per Appendix 2;
 - iii. Internal Audit's progress against the annual audit plan for 2023/24 as set out in Appendix 3.

3 BACKGROUND

- 3.1 Since the last meeting of the Committee final reports have been issued in respect of the following audits: Utilities Cost Management and Performance Indicators.
- 3.2 The main objective of the audits was to ensure that the internal controls in place were operating effectively. A summary of the main findings and recommendations from the audits are contained in Appendix 1.
- 3.3 For the audit reviews undertaken, Internal Audit has provided management with the following levels of assurance:
 - ➤ Utilities Cost Management Reasonable Assurance
 - ➤ Performance Indicators Reasonable Assurance
- 3.4 Internal Audit follows-up on recommendations made in previously issued audit reports to ensure that they have been implemented as agreed by Management.

Detailed spreadsheets are maintained to monitor progress being made and this report provides a summary of the current status for five audits that were reported in previous years. Our findings are detailed below:

City Deal Governance and Monitoring

3.5 Internal Audit's report on City Deal Governance and Monitoring was issued in November 2022. Our follow-up review has highlighted that one of the three recommendations made has been implemented, the two recommendations that have not been implemented relate to an internal Programme/Project Board for the Innovation Hub being set-up and for this Board to receive regular reports. To ensure effective scrutiny arrangements within the Council, this Board should have received regular reporting of the project risk register. This Board was initially set up, however changes in senior staff in this area have resulted in no further meetings being held. This is now being resolved and Programme/Project Board meetings will recommence early in the new year.

Finance Business Partners and Budget Monitoring

3.6 Internal Audit's report on Finance Business Partners and Budget Monitoring was issued in September 2022. Our follow-up review has highlighted that five of the eight recommendations made have been fully implemented. Three recommendations are partially implemented, revised procedures have been drafted both for finance staff and budget holders and will be rolled out alongside training for budget holders in 2024, with all three remaining recommendations due to be complete by June 2024.

Performance Indicators

3.7 Internal Audit's report on Performance Indicators was issued in September 2022. Our follow-up review has highlighted that all three recommendations made have been fully implemented.

Prevent and Return Project

3.8 Internal Audit's report on the Prevent and Return Project was issued in February 2022. Our follow-up review has highlighted that 10 of the 16 recommendations made have been fully implemented. Six of the recommendations have been partially implemented and are now scheduled to be completed by May 2024, details of the recommendations are included in Appendix 2.

Waste Services Income

3.9 Internal Audit's report on Waste Services Income was issued in September 2022. Our follow-up review has highlighted that all 15 recommendations made have been fully implemented.

Progress Report 2023/24

3.10 A progress report attached as Appendix 3 is prepared to assist the Committee in their remit to evaluate Internal Audit's work and measure progress against the annual audit plan for 2023/24.

4 POLICY IMPLICATIONS

4.1 None

5 INTEGRATED IMPACT ASSESSMENT

5.1 The subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

6 RESOURCE IMPLICATIONS

- 6.1 Financial None
- 6.2 Personnel None
- 6.3 Other None

7 BACKGROUND PAPERS

7.1 None

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DATE	8 December 2023

Appendix 1 Executive Summary: Utilities Cost Management

Conclusion: Reasonable Assurance

The Council benchmarks well in terms of performance, however, does not have either an energy or heating policy although there are procedures in place to monitor utility usage, however none of these procedures have been documented and set out formally. Contracts for electricity, gas and water put in place by the Scottish Government are utilised by the Council and the rates that the Council is charged are in line with the 2023/24 set rates. As part of the procurement and payment processes, checks have not been carried out to establish how the rates charged to the Council are calculated or to establish if the rates from the three other frameworks available to the Council would provide better value.

Background

As a local authority the Council has approximately 400 properties plus 155 charging points and stair wells within Council housing that are all supplied with some or all of gas, electricity, water and drainage. Using its purchasing power, the Scottish Government has put in place contracts covering all public sector buildings within Scotland, and it is these contracts that East Lothian are utilising. Regular updates on utility price increases have been received from Scottish Procurement with a schedule of prices from the suppliers before the start of each financial year.

Summary of findings & recommendations

The following key findings and recommendations are highlighted, which have all been **agreed by the Service Manager – Engineering Services & Building Standards and Transformation & Digital Portfolio Manager/Service Manager Procurement**:

- The Climate Change Strategy sets out high level requirements for the Council, whilst operational guidelines are in place these have not been formally documented into a Heating Policy or procedures. *Management have agreed to formalise policies and procedures by March 2024*.
- The current workload of the Energy Officer does not allow sufficient time to develop additional cost saving projects, whilst additional resource requirements have taken place at the Energy Board and CMT no business case has been developed. Management have agreed to develop and present a business case for further support by March 2024.
- No benchmarking work has been undertaken to confirm that the Council is receiving best value with the utility rates it is charged under the Scottish Government's contracts as opposed to the other three available frameworks, a management charge is now due to be applied to the use of these contracts, work now needs to be undertaken to ensure that they remain best value. Management have agreed to carry out a benchmarking exercise prior to the new contracts coming into place during 2024.

Recommendation Summary

Recommendations Grade	High	Medium	Low	Total
Current Report	1	5	-	6
Prior report	N/A	N/A	N/A	N/A*

^{*} This control review is new and no prior report exists for comparison.

Materiality

In the year 2022/23 and the period to October 2023 East Lothian Council has spent on utilities approximately, the following amounts:

	2022/23 (£)	Year to 31 Oct 2023 (£)
Electricity	3.5 million	2.4 million
Gas	2.0 million	0.5 million
Water	0.8 million	0.5 million
Total	6.3 million	3.4 million

Headlines

Objectives	Conclusion	Comment
1. Clear, accessible, relevant and appropriate Council utilities usage monitoring, financial and environmental control policies and procedures are in place.	Limited	Usage monitoring is being completed on a regular basis across the Council estate, however the demands of this activity result in very limited resources being available to identify and implement further energy and cost saving improvements. In addition, formalised documentation of policies and procedures in relating to Council energy management are required; however, a Climate Change Strategy was approved by the Cabinet in 2020 and subsequent reports show that the Council is reducing its Carbon Dioxide emissions.
2. Utilities have been appropriately procured in line with best practice and relevant legislation and regulations have been complied with.	Reasonable	Utility contracts have been appropriately procured by the Scottish Government for gas, electricity and water and the Council makes use of each of these. However, no benchmarking work has been carried out to establish if best value could be achieved by utilising one of the other three frameworks that are available to the public sector.
3. Invoices are accurate, paid timeously, appropriately recharged to services and any changes to the Council's estate are accurately recorded and reflected in charges made.	Reasonable	As part of the Scottish Government contract the supplier provides a schedule of rates for the coming year. A review of the rates being charged confirmed that these are in line with the schedule of charges set out at the beginning of the year. However, documentation from these rate reviews is not being maintained to provide an audit trail an improvement recommendation has been made and accepted to maintain this audit trail.
4. Invoices paid on behalf of third-party usage are recharged correctly and timeously.	Reasonable	Where third parties rent properties from the Council and the Council supplies the utilities invoices are sent to the third parties on a monthly basis. The Council's Charging Policy states that a full cost recovery approach is expected to be taken to recover costs incurred by all services involved in issuing an invoice, which is not currently the case for these invoices.
5. Utilities usage is adequately managed and monitored and appropriate action is taken to ensure efficiency, best value and a reduction in carbon emissions on a timeous basis.	Reasonable	Utility usage is monitored on a monthly basis as part of the extraction of information from the Energy Management system that accumulates all the consumption figures together with the billing details. However, whilst appropriate checks are undertaken to confirm that invoices are being charged at the correct contract rates, evidence of these checks are not being retained.
6. Plans are developed with services to reduce utilities usage where relevant, and the action taken by services is reviewed and monitored to ensure achievement of appropriate outcomes.	Reasonable	As part of a wide-spread review the Council is looking at the properties it currently uses to review the ongoing use of some and the renovation of others. Where buildings are being redesigned consideration is given to improving their thermal efficiency, where funds are available, and when new buildings are being planned and built, up to date thermal efficiency standards are being implemented.

Areas where expected controls are met/good practice

No.	Areas of Positive Assurance
1.	Monthly billing reports are reviewed to identify any obvious increases in the billing amounts and these are examined by the Energy Officer. Where appropriate amendments are promptly made by the supply companies.
2.	As part of the ongoing monitoring and targeting of electricity consumption within buildings, the Energy Officer has been looking at how lighting is provided. The installation of both LED lights and passive infrared sensors, which turn the lights off once there has been no movement within a room, can make a significant reduction in electricity consumption.
3.	Benchmarks for the consumption of gas and electricity have been set out by the Scottish Government and the Council's review against these benchmarks identified that for primary schools electricity consumption in 94% of the buildings is better than typical and in 73% better than good practice and for heating 89% of buildings are better than typical and 54% better than good practice.

Recommendation Grading/Overall opinion definitions

Recommendation	Definition				
High	Recommendations relating to factors fundamental to the success of the control objectives of the system. The weaknesses may give rise to significant financial loss/misstatement or failure of business processes.				
Medium	ecommendations which will improve the efficiency and effectiveness of the existing controls.				
Low	Recommendations concerning minor issues that are not critical, but which may prevent attainment of best practice and/or operational efficiency.				
Levels of Assurance	Definition				
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.				
Reasonable Assurance	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.				
Limited Assurance	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				
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.				

Executive Summary: Performance Indicators

Conclusion: Reasonable Assurance

The remit and powers of the Policy and Performance Review Committee (PPRC), as delegated by the Council, covers all matters relating to the performance of the Council's services. It is recognised that for the PPRC to effectively carry out this scrutiny role they require to be provided with comprehensive and up to date performance reports, this in turn requires service areas within the Council to provide the Council's Policy & Performance team with timely performance information, together with a detailed commentary on the reported figures. From our review of the Performance Indicator (PI) reports provided to the PPRC it is clear that there is a mixed practice across the Council in this regard – there are some excellent examples of service areas providing up to date performance information together with a clear commentary, but in other areas there are gaps in the information being provided. The Council has an appropriate governance framework in place for the development and approval of performance indicators, however to ensure that the full benefits are realised, and to enhance effective scrutiny, improvements are required in the PI information currently being provided.

Background

The PPRC is scheduled to meet four times a year and the Committee considers two types of reports:

- Regular reports on performance including Performance Indicators quarterly reports and the annual report on the Council's key performance indicators, an annual report on the Local Government Benchmarking Framework (LGBF) and annual updates on the Council Plan Top 50 indicators; and
- Reports requested by Members of the Committee seeking further information on issues that have arisen out of the performance reports or are otherwise of particular interest to one or more elected members.

Summary of findings & recommendations

The following key findings and recommendations are highlighted, which have all been agreed by Management:

- The Top 50 Council Plan Indicator Report, as provided to the PPRC, should provide complete and comprehensive information for each of the 50 indicators, including baselines and targets. *Management have agreed to have baselines and targets in place where appropriate by December 2023*.
- The quarterly performance reports presented to the PPRC should be complete and contain all relevant details, including up to date management comments for each indicator. *Management will seek to ensure that clear commentary is provided by service areas for all indicators by December 2023.*
- An action list of reports should be developed, to reflect requests from Members on specific areas that have arisen out of the performance data. Management have agreed that requests from Members for additional reports will be reflected in the PPRC work programme on an ongoing basis from **December 2023.**
- The PPRC should meet four times a year as scheduled and regular Member development and opportunities to refresh knowledge should be put in place for members of the Committee. *Management have agreed to ensure that this is available on an ongoing basis.*

Recommendation Summary

Recommendations Grade	High	Medium	Low	Total
Current Report	-	10	-	10
Prior Report	n/a	n/a	n/a	n/a

Materiality

The Council is a complex organisation, providing a wide range of services and maintaining appropriate oversight of performance can be a challenge. The Council currently reports on 50 Council Plan indicators, 19 annual indicators, 26 newly developed additional Poverty and Equality indicators and 38 quarterly indicators. In addition, there are 104 Local Government Benchmarking Framework (LGBF) indicators and service areas have nationally benchmarked indicators specific to their individual service.

Headlines

Objectives	Conclusion	Comment
1. An appropriate governance framework is in place for the development and approval of performance indicators, which is consistent with the Council Plan objectives.	Reasonable	An appropriate governance framework is in place for the development and approval of performance indicators. Following approval of the 2022-2027 Council Plan in August 2022, a new set of Top 50 Council Plan indicators was developed and approved by Council. The Top 50 indicators are reported on, together with other annual performance indicators, and quarterly performance indicator reports in respect of the performance of Council services.
2. There is regular review of the performance indicators that are being prepared and reported to ensure they remain appropriate and relevant to the Council's objectives, including the process for determining appropriate baselines and targets for each indicator.	Reasonable	The Council operates in a complex environment, and it is important that the indicators monitored reflect key strategic priority areas and risks, and that the Council is clear on the level of performance outcomes it aims to achieve. Measures are taken to ensure the continued relevance of the Council's performance information, including a new set of Poverty and Equality indicators, proposed changes to certain quarterly measures and the addition of new measures to be reported from Quarter 2. It is important that reasons for new or revised indicators are clearly outlined, that indicators measure against Council Plan objectives and are appropriately benchmarked.
3. The preparation and reporting of performance indicators ensures the provision of relevant and timely data, to enable effective scrutiny of key performance and outcomes, and there is clear evidence of Management providing comprehensive commentary, and where appropriate further explanation, on the reported performance indicators.	Reasonable	The Council Plan 2022-2027 Top 50 Performance Report, as presented to the PPRC meeting on 15 June 2023, only provided latest values (i.e. the current figures) for 23 indicators. For the 27 indicators for which current values were not provided, in some cases the comments section explained why the figures were not available (e.g. 2022/23 figures will be available later in the year) and provided a commentary on the previous (baseline) figures, however in other cases no explanations were provided as to why latest values were not included in the report. The annual "State of the Council" report which will be presented to Council in December 2023 will provide updates on these indicators, together with updated baselines and targets which are in the process of being developed for some indicators.
4. As required under the Council duty of Best Value, there is a clear mechanism for internal scrutiny by Members of performance and service outcomes.	Reasonable	The Council's Scheme of Administration outlines that the remit and powers of the Policy and Performance Review Committee (PPRC), as delegated by the Council, covers all matters relating to the performance of all the Council's services. The PPRC is scheduled to meet four times a year and considers two types of reports; regular reports on performance and reports requested by Members seeking further information on issues that have arisen out of the performance reports.
5. Where appropriate, remedial and/or recovery action is taken based on the reported performance indicators and the Council can clearly demonstrate that the preparation, reporting and scrutiny of performance indicators has led to measurable improvements in performance and service outcomes.	Reasonable	For the PPRC to effectively carry out their scrutiny role, they require to be provided with comprehensive and up to date performance reports. There are some excellent examples of service areas providing up to date performance information together with comprehensive commentary, and where appropriate further explanation, on the reported performance indicators, but in other areas there are gaps in the information being provided, in particular a lack of management comments to assist in interpretation. These gaps, which prevent a full picture of performance being presented, will inhibit the PPRC's ability to identify areas requiring further review or where remedial and/or recovery action is required.

Areas where expected controls are met/good practice

No Areas of Positive Assurance

- 1. The 2022-2027 Council Plan was approved by Council on 23 August 2022 and on 27 October 2022 Council approved the 2022-2027 Council Plan Action Plan and agreed that a new set of Top 50 Council Plan indicators will be presented to the Policy and Performance Review Committee (PPRC) for consideration, before coming to Council for approval. The Top 50 Council Plan indicators were presented to the PPRC for comment on 15 December 2022 and on 28 February 2023 Council approved the Top 50 Council Plan indicators. The Indicators were based around six Council Plan objectives Grow our Economy, Grow our People, Grow our Communities, Grow our Capacity, Reduce Poverty and Inequality and Respond to the Climate Emergency (no specific indicators were set against the seventh objective, Recovery and Renewal, as all the indicators were considered to contribute to meeting this objective). The Top 50 indicators included 29 indicators that were part of the 2017-2022 Council Plan Top 50 indicators and 21 new indicators. The Council also has several annual performance indicators that are not included in the Top 50, but which are also reported on. In addition to the Top 50 Council Plan indicators and annual indicators:
 - 1) The PPRC are provided with quarterly performance indicator reports in respect of the performance of Council services.
 - 2) The Local Government Benchmarking Framework (LGBF) indicators are provided to the PPRC on an annual basis.
 - 3) At the PPRC meeting of 21 September 2023, the Committee were provided with a recommended set of Poverty and Equality indicators, which they were asked to approve and note that work is ongoing to develop baselines and targets for some of the indicators that are still in development.
- 2. The PPRC is scheduled to meet four times a year and at the meeting of 9 June 2022, the first meeting of the PPRC after the Local Government elections, a Guide to Scrutiny and Review was presented, which highlighted that the work of the Committee focuses on the review of performance and considering reports on matters of concern to the Committee in seeking assurance that under performance is being addressed. The report also covered the principles of scrutiny, the work programme, selecting topics for scrutiny and review, scrutiny techniques, making sense of performance data and what to look for in a performance report. The report highlighted that performance indicators should be used to identify areas for further investigation and review. In addition, a Legacy Report was presented which highlighted that the Committee considers two types of reports:
 - Regular reports on performance including Performance Indicators quarterly reports and the annual report on the Council's key performance indicators, an annual report on the Improvement Service's Local Government Benchmarking Framework (which includes over 100 indicators) and annual updates on the Council Plan Top 50 indicators;
 - Reports requested by Members of the Committee seeking further information on issues that have arisen out of the performance reports or are otherwise of particular interest to one or more elected members. The Legacy Report advised that over the last five years, the Committee has received reports on a wide range of subjects and provided examples of these, and that in scrutinising the quarterly performance reports, Members have asked for explanations and further information on a wide range of indicators (list provided).
- 3. Scrutiny is the term used to describe the way in which the performance, decisions and plans of the Council are examined by the Elected Members who are not part of the Cabinet. Internal scrutiny by Elected Members has taken on much greater significance following publication of the Crerar Review in 2007. The report recommended that rather than rely on the results of external scrutiny exercises "the primary responsibility for demonstrating compliance and performance should rest with the service provider". The reporting of performance information helps the Council demonstrate that it is achieving Best Value regarding "Commitment and Leadership", "Sound Governance at a Strategic, Financial and Operational Level" and "Accountability". The scrutiny by Elected Members is part of "Commitment and Leadership" and the reporting of performance indicators is intended to assist in this process.

Recommendation Grading/Overall opinion definitions

Recommendation	Definition
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OUTSTANDING RECOMMENDATIONS Prevent and Return

REC REF	RECOMMENDATION	GRADE	RESPONSIBLE OFFICER	ACTION UPDATE	AGREED DATE OF COMPLETION	REVISED DATE OF COMPLETION
1.2	Partly Implemented Consideration should be given to reviewing the existing procedures within Children's Services in respect of external residential care to ensure that the aims of the Prevent and Return Project are properly embedded.	Medium	Head of Children's Services	With the new processes and governance measures working well, the written guidance needs to be further updated to reflect the changes made.	March 2022	May 2024
1.3	Partly Implemented Management should ensure that the governance framework clearly outlines the roles and responsibilities of all relevant groups and how the decision-making process is co-ordinated for the Prevent and Return Project.	Medium	Head of Education & Head of Children's Services	Guidelines for the Governance meetings including the new Tracking meeting were drawn up earlier in the year and need approval from CSMT in line with the revised guidance.	December 2022	May 2024
2.2	Partly Implemented Management should ensure that regular analytical reviews are undertaken on the data sets maintained by Education and Children's Services in respect of vulnerable children and young people.	Medium	Head of Children's Services	Tracking and other governance meetings review regular data sets however an annual summary will now be written to analyse the data. This will be passed to CSMT for review.	January 2023	January 2024

REC REF	RECOMMENDATION	GRADE	RESPONSIBLE OFFICER	ACTION UPDATE	AGREED DATE OF COMPLETION	REVISED DATE OF COMPLETION
3.2	Partly Implemented Management should ensure that referrals to the SORG meetings include the minutes in respect of any funding/ support provided by the Internal Panel/MARG and the ERG.	Medium	Head of Children's Services	Whilst the SORG no longer operates referrals the new governance mechanism does include this information; however, this has not yet been formalised in written guidance.	March 2022	May 2024
3.3	Partly Implemented Management should ensure that children's referrals to the SORG meetings include the budgeted costs for all options being considered.	Medium	Head of Children's Services	Whilst the SORG no longer operates referrals the new governance mechanism does include this information; however, this has not yet been formalised in written guidance.	March 2022	May 2024
5.1	Partly Implemented Management should ensure that arrangements are in place for reporting on the success of outcomes for children returning to East Lothian at the SORG.	Medium	Head of Children's Services	Tracker meetings are reviewing this information on a sixmonthly basis going forward, however the annual summary report will provide an analysis of data on the success of outcomes for returning young people.	September 2022	January 2024

	COMPLETION DATE	STATUS
Examine the processes in place to demonstrate that the Council is taking all ecommended steps to ensure continued financial sustainability in the long term against the financial sustainability principles within the CIPFA FM Code.	June 2024	
Examine the processes in place for ensuring that capital contract costs remain within the contracted costs and are managed to remain within the budgeted project costs for each Capital Contract.	June 2024	
For all sundry accounts examine the reconciliation controls to recorded income and the processes in place to ensure maximum recovery of income across all Council services.	March 2024	In Planning
Review of the Council's Treasury Management processes to ensure that maximum prudential returns are being made on available treasury funds.	March 2024	
Examine the authorisation processes for approval of the use of agency workers and contractors across the Council and the management of the use of agency workers and contractors to ensure all risks to the Council are managed.	March 2024	In Progress
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AUDIT REPORTS	SCOPE OF THE AUDIT	TARGET COMPLETION DATE	STATUS
Cost of Growth	Review the processes in place to establish what the revenue budget costs are of increasing Council services to meet increased population within East Lothian and how consideration of this growth is demonstrated in the annual budget process and development of medium and long term financial strategies.	March 2024	In Progress
Housing Void Management	Examine the processes in place within the Housing and Property Maintenance teams to manage the timely return of void properties to a compliant standard for operational use.	March 2024	
Devolved School Management	Examine the processes and controls in place to ensure compliance with the newly reviewed and approved Devolved School Management Procedures.	June 2024	
Asset Management Review Project Management	Examine the project management process in place in relation to the current asset management process of building moves across the Council to ensure that it is meeting the objectives set.	June 2024	
Utilities Cost Management	Examine the processes in place to ensure that a best value process is in place to manage the utilities costs across the Council's buildings portfolio.	December 2023	Complete
Musselburgh Flood Prevention Scheme Governance Processes	Examine the Governance processes in place to manage and control the development and procurement for the Musselburgh Flood Prevention Scheme.	June 2024	In Planning

AUDIT REPORTS	SCOPE OF THE AUDIT	TARGET COMPLETION DATE	STATUS
Roads	Examine the Roads trading account operation and establish that this is operating in a best value format for the Council.	June 2024	
Partnership Funding	Review the grant funding provided to external organisations by the Council and review the processes in place to ensure that funding is linked to specific outcomes and organisational sustainability is promoted.	June 2024	
Education Additional Support Needs	Examine the processes around assessment and provision of additional support needs for children.	March 2024	
Miscellaneous Grants	For grants awarded to the Council by the Scottish Government, Internal Audit is sometimes required to provide a statement of compliance with grant conditions on an annual basis.	September 2023	Complete
Scottish Housing Regulator (SHR) Annual Assurance Statement	Work required to provide assurance on the regulatory requirements set out in the Scottish Housing Regulator's Chapter 3 of the Regulatory Framework.	September 2023	Complete
Review of Performance Indicators			Complete