

Cairngorms National Park Authority Internal Audit Plan 2023/24

March 2023

Cairngorms National Park Authority

Internal Audit Plan 2023/24

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Introduction

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, internal control and governance processes.

Section 3 - Definition of Internal Auditing, Public Sector Internal Audit Standards

The PSIAS require the Chief Internal Auditor to produce a risk-based plan, which takes into account Cairngorm National Park Authority's risk management framework, its strategic objectives and priorities and the views of senior managers and the Audit & Risk Committee. The objective of audit planning is to direct audit resources in the most efficient manner to provide sufficient assurance that key risks are being managed effectively and value for money is being achieved.

Internal audit is only one source of assurance for the Audit & Risk Committee. Assurance on the management of risk is provided from a number of other sources, including the senior management team, external audit and the risk management framework itself.

This document addresses these requirements by setting out an internal audit plan for 2023/24 in the context of a three-year plan for 2021/22 to 2023/24.

Audit & Risk Committee action

This latest version of the audit plan reflects discussions with the Chief Executive and the Director of Corporate Services and Deputy Chief Executive in February 2023. All feedback received to date has been factored into the plan to ensure internal audit work is as relevant and targeted to CNPA's needs as possible, and that it is supporting management and the Board in addressing the organisation's key risks.

The Audit & Risk Committee is asked to review and approve the proposed Internal Audit Plan for 2023/24.

Internal Audit Plan 2023/24

Audit area	2021/22	2022/23	2023/24	Risk Register Ref	Audit objectives
A. Financial systems					
A.1 Financial management and reporting	8				Review of financial planning, budget management and reporting to management and the board.
A.2 Payroll and expenses		6			Review of the controls in place for the payment of staff salaries and expenses. Potential to utilise data analytics to undertake 100% sampling.
A.3 Expenditure and Creditors			7	Financial risks	Review of the controls over the processing and monitoring of expenditure and creditor payments.
A.4. Finance System and Processes			8	Financial risks	Advisory review considering whether the SAGE finance system is being utilised to provide appropriate financial monitoring for CNPA and is reflective of the operational structure of the organisation.
Subtotal A:	8	6	15		
B. Governance and Corporate S	Systems				
B.1 Assurance Mapping of Major Projects	8				Review of the mechanisms in place to ensure the Board are being provided with assurance over projects where CNPA acts as accountable body.
B.2 Performance Management		8			Review of the monitoring and evaluation framework in place to monitor and evaluate performance against the National Park Partnership Plan and CNPA Corporate Plan.
B.3 Risk Management			7	All	Review of the policies, procedures and practices in place to support robust risk management within CNPA. Work will build on the Risk Appetite work being undertaken by the Board.
Subtotal B:	8	8	7		

Audit area	2021/22	2022/23	2023/24	Risk Register Ref	Audit objectives
C.1 Health and Safety			7	A14.1	To review the operation and reporting on Health and Safety policies and procedures.
C.2 Workforce Management and Planning		11			Review of the arrangements in place for planning future workforce needs to deliver strategies and corporate plans. Will also consider the recruitment and retention arrangements in place for staff and ongoing staff wellbeing initiatives, particularly in the context of covid-19 impact.
C.3 Procurement			8	Financial Risk	Review of the arrangements in place over the procurement of goods and services.
C4. Heritage Horizons			8	A1	A review of the governance and reporting arrangements for the Heritage Horizons programme to ensure those processes are suitable for the delivery phase of the programme and that lessons learned from the development phase have been implemented.
Subtotal C:		11	23		
D. Information technology					
D.1 ICT Strategy	7				Review to ensure an up-to-date ICT strategy is in place and being actively maintained.
D.2 Data Management		7			A review of the adequacy of current data management processes in place that support the organisation, with particular consideration over processes emerging from COVID-19 and changes to CNPA's IT Infrastructure.
D.3 Cyber Security	7				Review of the arrangements in place to mitigate cyber security risks.
Subtotal D:	14	7			

Audit area	2021/22	2022/23	2023/24	Risk Register Ref	Audit objectives
E.1 LEADER Administration	7	5			To provide assurance on compliance with SLA between CNPA and Scottish Government on administration of EU LEADER funding.
E.2 Follow Up	3	3	3	All	To provide independent assurance to the audit and risk committee that agreed actions from previous internal audit reports are implemented as planned.
Subtotal E:	10	8	3		
F. Management					
Internal audit management and administration	2	2	2		
Audit and Risk Committee planning, reporting and attendance	3	3	3		
Audit needs analysis - strategic and operational IA planning	3	3	3		
Contract management	2	2	2		For coordination and efficiency
Annual internal audit report	1	1	1		
Subtotal F:	11	11	11		
TOTAL	51	51	59		

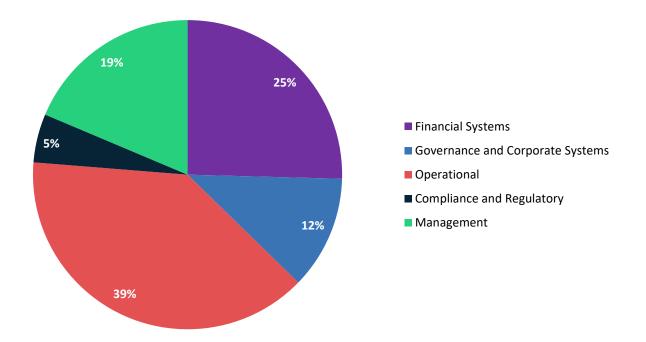
Review timetable 2023/24

We have provided indicative dates below for each of the planned reviews for 2023/24 and will confirm exact timings with management following approval of the plan.

Review	Audit Sponsor	Start fieldwork	Complete fieldwork	Draft Report	Management Response	Final Report	ARC Meeting
A3. Expenditure and Creditors	Director of Corporate Services and Deputy CEO	June 2023	July 2023	July 2023	August 2023	August 2023	September 2023
A4. Finance Systems and Processes	Director of Corporate Services and Deputy CEO	June 2023	July 2023	July 2023	August 2023	August 2023	September 2023
B3. Risk Management	Director of Corporate Services and Deputy CEO	July 2023	July 2023	August 2023	August 2023	August 2023	September 2023
C1. Health and Safety	Director of Corporate Services and Deputy CEO	September 2023	October 2023	October 2023	October 2023	November 2023	December 2023
C3. Procurement	Director of Corporate Services and Deputy CEO	December 2023	December 2023	January 2024	January 2024	February 2024	March 2024
C4. Heritage Horizons	Director of Corporate Services and Deputy CEO	September 2023	October 2023	October 2023	November 2023	November 2023	December 2023
F1. Follow up – Part 1	Director of Corporate Services and Deputy CEO	October 2023	October 2023	November 2023	November 2023	November 2023	November 2023
F1. Follow up – Part 2	Director of Corporate Services and Deputy CEO	April 2024	April 2024	May 2024	May 2024	May 2024	May 2024
Annual internal audit report	n/a	n/a	n/a	n/a	n/a	n/a	May 2024

Allocation of audit days

The table below demonstrates how the internal audit days for 2023/24 are allocated across each area of the audit universe (Appendix 2).



Allocation of audit days

Internal audit approach

Supporting the Governance Statement

Our Internal Audit Plan is designed to provide Cairngorms National Park Authority, through the Audit & Risk Committee, with the assurance it needs to prepare an annual Governance Statement that complies with best practice in corporate governance. We also aim to contribute to the improvement of governance, risk management and internal control processes by using a systematic and disciplined evaluation approach.

Compliance with best practice

Azet's internal audit methodology complies fully with the Public Sector Internal Audit Standards (PSIAS), which cover the mandatory elements of the Chartered Institute of Internal Auditors' International Professional Practices Framework.

Risk based internal auditing

Our methodology links internal audit activity to the organisation's risk management framework. The main benefit to Cairngorms National Park Authority is a strategic, targeted internal audit function that focuses on the key risk areas and provides maximum value for money.

By focussing on the key risk areas, internal audit should be able to conclude that:

- Management has identified, assessed and responded to Cairngorms National Park Authority's key risks;
- The responses to risks are effective but not excessive;
- Where residual risk is unacceptably high, further action is being taken;
- Risk management processes, including the effectiveness of responses, are being monitored by management to ensure they continue to operate effectively; and
- Risks, responses and actions are being properly classified and reported.

We have reviewed Cairngorm National Park Authority's risk management arrangements and have confirmed that they are sufficiently robust for us to place reliance on the risk register as one source of the information we use to inform our audit needs assessment.

Audit needs assessment

Our internal audit plans are based on an assessment of audit need. "Audit need" represents the assurance required by the Audit & Risk Committee from internal audit that the control systems established to manage and mitigate the key inherent risks are adequate and operating effectively. The objective of the audit needs assessment is therefore to identify these key controls systems and determine the internal audit resource required to provide assurance on their effectiveness.

Our audit needs assessment involved the following activities:

- Reviewing Cairngorms National Park Authority's risk register,
- Reviewing Cairngorms National Park Authority's corporate operational plan,
- Reviewing previous internal audit reports,

- Reviewing external audit reports and plans,
- Reviewing the Cairngorms National Park Authority's website and internal policies and procedures,
- Utilising our experience at similar organisations, and
- Discussions with senior management and the Audit & Risk Committee

The plan has also been cross-referenced to the Cairngorm National Park Authority's risk register as at November 2022. The audit universe is included at Appendix 2.

Best value

Our work helps Cairngorms National Park Authority to determine whether services are providing best value. Every report includes an assessment of value for money; i.e. whether the controls identified to mitigate risks are working efficiently and effectively. Where we identify opportunities for improving value for money, we raise these with management and include them in the report action plan.

Liaison with external audit

We seek to complement the areas being covered by Cairngorms National Park Authority's external auditor. We welcome comments on the internal audit plan from Mazars at any time. This will help us to target our work in the most effective manner, avoiding duplication of effort and maximising the use of total audit resource.

Delivering the internal audit plan

Internal Audit Charter

At Appendix 3 we have set out our Internal Audit Charter, which details how we will work together to deliver the internal audit programme.

Internal Audit team - indicative staff mix

Grade	2023/24 Input (days)	Grade mix (%)
Partner / Director	7	12%
Manager	13	22%
Auditors	39	66%
Total	59	100%

Internal Audit Team Contacts

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Appendix 1 – Corporate Risk Register

As part of our audit needs assessment, we reviewed the Corporate Risk Register (as at November 2022) to consider auditable areas against identified risks.

Risk	Ref	Resp	Mitigation	Comments	Trend Jan 22	Trend May 22	Trend Nov 22
Resources: public sector finances constrain capacity to allocate sufficient resources to deliver corporate plan.	A1	DC	Preventative: Ongoing liaison with Scottish Government highlighting achievements of CNPA. Preventative: Corporate plan prioritised around anticipated Scottish Government budget allocations, taking on Board expectation of funding constraints. Remedial: Focus resource on diversification of income streams to alternate, non-public income generation. Remedial: Continuing to support "delivery bodies" such as Cairngorms Nature, Cairngorms Trust in securing inward investment.	2022/23 budget approved by board on 25 March highlighted a significant step change in funding levels for CNPA across both government and external sources. Remedial mitigation on diversification of income particularly successful with regard to National Lottery Heritage Funds (NLHF) secured. Risk escalation reflects Scottish Government's continued and heightened concerns on forward stability of current financial allocations; risk of in-year adjustments, and risk over future year funding levels.			

Risk	Ref	Resp	Mitigation	Comments	Trend Jan 22	Trend May 22	Trend Nov 22
Resourcing: future community led local development funding currently delivered through LEADER, together with wider funding previously from EU structural and agricultural sources is lost and creates a significant gap in our capacity to deliver against our development priorities	A12. 2	DC	Preventative: prioritise engagement in consultations and events around the future development of structural and community funding. Remedial: continue to support work of Cairngorms Trust in attracting voluntary donations toward community action – although this is likely to remain at a much smaller scale for some time. Remedial: continue to review opportunities for funding bids to other non-governmental funding sources.	Positive movement continuing across policy development areas within Scottish Government around the continuity of some form of CLLD with further funding allocations expected for 2022/23. However, opportunity to access UK Government funding to replace EU losses still very unclear. Wider changes to agri-environment schemes and impact of change also remains highly uncertain			
Staffing: additional externally funded projects strains staff workload capacity with increased risks of stress and reduced morale.	A9.3	DC	Preventative: Strategic and operational plans for 2022/23 will be developed with externally funded project delivery as intrinsic elements of plans to ensure delivery capacity is considered fully. Importance of staff management and task prioritisation reinforced through leadership meetings. Focus on fewer, larger impact projects.	Additional recruitment in 22/23 to alleviate key staff pressure points complete. Likelihood of risk therefore declining and risk profile therefore reducing. Impact of measures and risk profile will continue to be closely monitored through staff management processes.		1	

Risk	Ref	Resp	Mitigation	Comments	Trend Jan 22	Trend May 22	Trend Nov 22
Resourcing: Role as	A11.	DC	Preventative:	Work has progressed well on			
Lead / Accountable	1		Ensure financial controls in place	closure of LEADER, Tomintoul and			
body for major			for programme management	Glenlivet and on Badenoch			
programmes (e.g.			include effective eligibility checks.	programmes with no issues arising			
LEADER,			Test processes with funders if	to date. Some external audit work	•		· ·
Landscape			required and also undertake early	continuing on LEADER and worth			
Partnership) has risk			internal audit checks. Workforce	retaining sight of this as a strategic			
of significant			management plans must	risk to reflect scale of exposure			
financial clawback			incorporate programme staff	despite long term low risk trend.			
should expenditure			considerations.				
prove to be not			Ensure TGLP Management and				
eligible for funding,			Maintenance contracts are all in				
while CNPA carries			place to ensure eligibility of				
responsibilities as			investment.				
employer for			Remedial: Utilise internal audit				
programme staff.			resources				
Technical:	A17	DC	Preventative: invest in additional	Added April 2018 Operational			
Increasing ICT			staff resource. Deploy timetabled	Management Group Movement into			
dependency for			action plan against approved ICT	Microsoft 365 deployment and cloud			
effective and efficient			Strategy	based systems has involved			
operations is not			Remedial: New ICT Strategy to be	significant work and some disruption		,	
adequately backed			developed to reappraise position	to staff operations. Internal audit			
up by ICT systems			on IT dependencies and establish	work reinforces need to focus on			
support.			a focus for future digital	project management of activities			
			development across the Authority.	both for management of processes			
			Clear action planning to evolve	and improved organisational			
			from final ICT strategic direction	communications.			
			once agreed.				

Risk	Ref	Resp	Mitigation	Comments	Trend Jan 22	Trend May 22	Trend Nov 22
Technical: Cyber	A18	DC	Preventative: Implementation of	Added by MT / OMG April 18.			
security is inadequate to address risk of cyber-attack on systems			Scottish Government Cyber Security Action Plans and internal audit recommendations on IT security. Ongoing review of systems and procedures in tandem with LLTNPA. Rescope arrangements through IT Strategy. Invest in cyber security	Additional cyber security measures invested in and implemented. Aware of increased risks highlighted by national agencies during COVID response. Cyber security plus accreditation being reapplied for. Reviewing options for further increased security measures.			
			Rescope arrangements through IT	options for further increased security			

Resourcing: CNPA IT services are not sufficiently robust / secure / or well enough specified to support effective and efficient service delivery.	A13	DC	Preventative: We will develop and consult on the forward plans for ICT service development to ensure these meet service requirements. Commissioned external review of our IT and data management processes to be implemented to give assurance, with recommendations arising acted upon.	Retained as a risk rather than merged into other IT risks following May 2022 ARC review. Internal audit report on IT Strategy sets out key actions in this area of risk management around IT Strategy development, project management and costing of IT action plans to be implemented.		
Reputation: One-off, high-profile incidents and / or vociferous social media correspondents have an undue influence on the Authority's positive reputation.	A14. 1	GM	Preventative: Engagement and communications strategy, and stakeholder engagement will seek to take the front foot on managing the Authority's positive, public reputation Preventative: proactive communications initiated to address any potential incidents Remedial: involvement in emerging NPUK collective communications strategy and campaigns which will produce additional high profile positive reputational impact Remedial: Social media profile represents an opportunity to boost reputation.	Adopted by ARC November 20 to consolidate all reputational risks. Recruitment now complete to support this work within the communications team. Overall sense of current position is a decline in this risk area, following responses to NPPP approval and wider communications work over summer and autumn.		

Resourcing: scale of	A16	DC	Remedial: Review of accounting	Added by MT / OMG April 18.		
asset responsibilities			procedures and asset recognition	Infrastructure maintenance issues		
such as for paths,			policy; review of forthcoming	exacerbated by end of existing		
outdoor infrastructure			accounting technical guidance.	agreements over key routes and by		
is not adequately			Ensure full consideration is given in	additional COVID19 related visitor		
recognised and does			budget reviews. Preventative: Capital	pressures, while COVID has also		
not secure adequate			bids to government and Alternate	disrupted plans around implementation		
forward maintenance			funding sources such as visitor giving	of voluntary giving schemes.		
funding.			to be explored more actively.	Significant increase in capital allocation		
			Work on Strategic Tourism Visitor	has allowed scope for increased		
			Infrastructure Plan to focus action.	programming of maintenance over		
				2021 to 2025.		
Resources: change in	A20	DC	Remedial: Monitor pattern of IT	Added by Audit Committee 8 March		
financing IT services			Investment costs as regards the	2019 following "deep dive" IT risk		
and the switch from			capital and revenue split of	review.		
capital to revenue			resourcing requirements; build	Risk remains live as we implement a		
provision places an			impacts into ongoing budget	refreshed ICT Strategy and move to		
unmanageable			deliberations with Scottish	more cloud / service solutions. While		
pressure on the			Government.	there was sufficient budget cover for		
Authority's budget				the initial implementation of cloud		
capacity.				based services in 21/22, the final		
				position will crystalise over 22/23 and		
				into the 23/24 budget.		
Reputation: The	A21	GM	Preventative: Ensure Board policy	Added by Audit Committee 8 March	1	
Authority is not			papers and Planning Committee	2019 following internal audit report on		
perceived to be			papers are explicit in recognising	strategic planning processes.		
appropriately			strategic policy conflicts between 4	NPPP development process now		
addressing the			statutory aims and in addressing the	nearing conclusion where this can be		•
potential for conflict			evaluation of any potential conflict.	underpinned. Also part of consultation		
between 4 statutory			Preventative: ensure clarity on this	on national parks.		
aims.			matter is established through high			

			level NPPP and Corporate Plan documents			
Technical: Business Continuity Plans (BCP) are inadequate to deal with significant impacts to normal working arrangements and result in service failure.	A22	DC	Preventative: Overhaul of BCP developed in 2014 with reporting on development of plans through Management Team and Audit and Risk Committee. Test BCP arrangements once plan in place and communicated. Remedial: internal audit review of COVID19 over winter 20/21 will lead into lessons learned on wider BCP.	Added by Audit Committee May 2019 following internal audit review of BCP. Delay in finalisation of BCP documentation itself as we focus on establishment of hybrid working arrangements post COVID. However, work on BCP has considerably assisted in roll out of initial and ongoing responses to Coronavirus pandemic with evidence, including very positive staff feedback, that BCP implementation has been effective.		
Technical: The Authority's range of powers combined with strategic partnerships is insufficient to deliver outcomes on wildlife crime	A24	AF	Remedial: use NPPP development processes to explore partnership attitudes, engagement and powers which they may add to the current controls. Preventative: explore potential for licencing or other regulatory arrangements to contribute to more effective control framework. Tracker / satellite monitoring deployment;	Added by SMT risk review May 2021 Mitigation actions still in development stages and risk profile retained.		
Technical: The Authority's Peatland Programme outcomes may be adversely impacted by a lack of contractor capacity	A25	MF	Preventative: interaction with skills and economic development agencies to highlight the problems of contractor capacity and scale of future programme; Remedial: phasing of works to act on more straightforward, less technical	Added by SMT risk review May 2021 Recent evidence suggests increased level of response to peatland tenders and evidence of some new entrants to this market. Some ongoing evidence of success of risk mitigation measures, with programme on target for delivery		

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areas to assist new contractors enter market and develop skills and understanding; reprofile capital expenditure to recognise more expensive, more complex projects	of area of restoration for second year in succession.		
coming toward end of funding period.			

Reputational: key communications activities, messaging and (in some cases) brand awareness raising can be dependent on partner collaboration rather than under direct control, with potential for ineffective or disjointed communication outcomes	A26	GM	Preventative: agree partnership frameworks that explicitly set out expectations and outcomes of collaborative activities and establish adequate control mechanisms. Preventative: specifically monitor and feedback on communications effectiveness where there are partnership dependencies Remedial: conduct review meetings which track and document progress and escalate and issues arising to appropriate governance groups. Remedial: review brand management and approaches to partnership linkages through brand	Added by SMT risk review May 2021. Identified as a stable risk at present rather than escalating, while recognised that work remains to be undertaken around these preventative and remedial mitigation measures.		
Technical: approaches to conservation and protection of endangered species may be insufficient to achieve associated strategic outcomes	A27	PM	Remedial: review current approaches in context of relevant data sources to determine adequacy of current approaches. Remedial: use NPPP development processes to test potential for enhanced / revised approaches to conservation and protection of endangered species	Added by SMT risk review May 2021. Identified as a stable risk at present rather than escalating, while recognised that work remains to be undertaken or is ongoing around these preventative and remedial mitigation measures.		

Staffing: delivery of key outcomes is impacted by staff turnover, particularly in project teams.	A28	DC	Preventative: consider HR solutions to encourage retention Remedial: ensure succession planning and operational risk registers cover this strategic risk	Added following Board reflection on impact of turnover in TGLP Project. Some ongoing staff turnover continuing to impact areas of delivery and risk profile maintained.		
Staffing: increasingly competitive and restricted recruitment climate prevents staff with the required experience and skill sets being secured	A29	DC	Preventative: focus on training and development and internal succession planning, in turn bringing recruitment into less experienced / less highly skilled markets; consider job design and flexibility of offer regarding part- time / job share. Remedial: contingency planning for example around out-sourcing of aspects of delivery.	Added by SMT review 18 Jan. Evidence of reducing number of applicants and candidate lists for vacancies and emerging trend in unsuccessful recruitment exercises.		

Appendix 2 – Internal Audit Universe

Auditable area	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Notes
A. Financial Systems								
Project Financing			~					
Grant Funding and Management Pensions Administration								
Payroll Administration			~			✓		
Expense Claims Process			~					
Procurement							✓	
Financial Reporting					~		✓	
Financial Ledger							✓	
Budget Management					~			
Treasury and Cash Management								
Expenditure and Creditors							✓	
Income and Receivables								
Non-Current Assets								
Counter Fraud								
Financial Planning		~			~			
B. Strategic and Governance								
Corporate Governance	~			~				
Risk Management			~				~	
Strategic Planning		~				~		
Strategic Engagement		~						
Partnership Management		~						

Sickness Absence								
Estates and Asset Management (Outdoor Access Infrastructure)								
Legacy Liabilities								
Marketing								
C. Operational	1	1	1	1	1	1	<u>i</u>	1
Business Continuity Planning		~		~				
Project Management		~	~				✓	
Resource Planning			~			~		
Communications and Social Media Strategy	~							
Staff Objective Setting and Appraisal			~					
Freedom of Information			~					
Recruitment and Retention						~		
Complaints Management								
Workforce Planning						~		
Operational Planning								
Health and Safety							✓	
Performance Management		~				~		
D. Information Technology								
ICT General Controls Review	~							
ICT Performance and Strategic Development	~							

Network Management								
Data Management				~		~		
IT Strategy					~			
IT Security					~			
GDPR						~		
Disaster Recovery Planning				~				
IT applications review								
Cyber Security					~			
E. Compliance and Regulatory								
LEADER Administration	~	✓	~	~	~	~		
Follow Up	~	~	~	~	~	~	✓	

Appendix 3 – Internal Audit Charter

The mission for internal auditing is to enhance and protect organisational value by providing risk-based and objective assurance, advice and insight.

Definition

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve Cairngorm's National Park Authority operations. It helps Cairngorm's National Park Authority accomplish its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Aim

The aim of this Charter is to set out the management by all parties of the internal audit process. The Charter sets out the context of the internal audit function, including the place of the Audit Committee, the key personnel, timescales and processes to be followed for each internal audit review.

Role

The internal audit activity is established by the Board of Directors or oversight body (hereafter referred to as the Board). The internal audit activity's responsibilities are defined by the Board as part of their oversight role.

Professionalism

The internal audit activity will govern itself by adherence to The Institute of Internal Auditors' mandatory guidance including the Definition of Internal Auditing, the Core Principles of Professional Practice of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing (Standards). This mandatory guidance constitutes principles of the fundamental requirements for the professional practice of internal auditing and for evaluating the effectiveness of the internal audit activity's performance.

The IIA's Practice Advisories, Implementation Guidance, Practice Guides, and Position Papers will also be adhered to as applicable to guide operations. In addition, the internal audit activity will adhere to Cairngorms National Park Authority's relevant policies and procedures and the internal audit activity's standard operating procedures manual.

Authority

The internal audit activity, with strict accountability for confidentiality and safeguarding records and information, is authorised full, free, and unrestricted access to any and all of the organisation's records, physical properties, and personnel pertinent to carrying out any engagement. All employees are requested to assist the internal audit activity in fulfilling its roles and responsibilities. The internal audit activity will also have free and unrestricted access to the Board.

Accountability

The Chief Internal Auditor will be accountable to the Audit & Risk Committee and will report administratively to the Director of Corporate Services.

The Audit & Risk Committee will approve all decisions regarding the performance evaluation, appointment, or removal of the Chief Internal Auditor.

The Chief Internal Auditor will communicate and interact directly with the Audit & Risk Committee, including between Audit & Risk Committee meetings as appropriate.

Independence and objectivity

The internal audit activity will remain free from interference by any element in the organisation, including matters of audit selection, scope, procedures, frequency, timing, or report content. This is essential in maintaining the internal auditors' independence and objectivity.

Internal auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, manage risks, prepare records, or engage in any other activity that may impair internal auditor's judgment.

Internal auditors must exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. Internal auditors must make a balanced assessment of all the relevant circumstances and not be unduly influenced by their own interests or by others in forming judgments.

The Chief Internal Auditor will confirm to the Audit & Risk Committee, at least annually, the organisational independence of the internal audit activity. Any interference experienced should be disclosed by the Chief Internal Auditor to the Board and the implications discussed.

Scope and responsibility

The scope of internal auditing encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organisation's governance, risk management, and internal control processes in relation to the organisation's defined goals and objectives. Internal control objectives considered by internal audit include:

- Consistency of operations or programs with established objectives and goals and effective performance.
- Effectiveness and efficiency of operations and employment of resources.
- Compliance with significant policies, plans, procedures, laws, and regulations.
- Reliability and integrity of management and financial information processes, including the means to identify, measure, classify, and report such information.
- Safeguarding of assets.

Internal Audit is responsible for evaluating all processes ('audit universe') of Cairngorms National Park Authority, including governance processes and risk management processes. In doing so, internal audit maintains a proper degree of coordination with external audit and where practical other assurance providers. Internal audit may perform consulting and advisory services related to governance, risk management and control as appropriate for the organisation. It may also evaluate specific operations at the request of the Audit & Risk Committee or management, as appropriate.

Based on its activity, internal audit is responsible for reporting significant risk exposures and control issues identified to the Audit & Risk Committee and to senior management, including fraud risks, governance issues, and other matters needed or requested by Cairngorms National Park Authority.

Annual internal audit plan

The audit year runs from 1 April to 31 March.

At least annually, the Chief Internal Auditor will submit to the audit committee an internal audit plan for review and approval. The internal audit plan will detail, for each subject review area:

- The outline scope for the review,
- The number of days budgeted,
- The timing, including which Audit & Risk Committee the final will report will go to,
- The review sponsor.

The Chief Internal Auditor will communicate the impact of resource limitations and significant interim changes to senior management and the Board.

The internal audit plan will be developed based on a prioritisation of the audit universe using a risk-based methodology, including input of senior management. Prior to submission to the Audit & Risk Committee for approval, the plan will be discussed with appropriate senior management. Any significant deviation from the approved internal audit plan will be communicated through the periodic activity reporting process.

Assignment Planning and Conduct

An assignment plan will be drafted prior to the start of every assignment setting out the scope, objectives, timescales and key contacts for the assignment.

Specifically, the assignment plan will detail the timescales for carrying out the work, issuing the draft report, receiving management responses and issuing the final report. The assignment plan will also include the name of the staff member who will be responsible for the audit (review sponsor) and the name of any key staff members to be contacted during the review (key audit contact).

The assignment plan will be agreed with the review sponsor and the key audit contact (for timings) before the review starts.

Reporting and Monitoring

The internal auditor will discuss key issues arising from the audit as soon as reasonably practicable with the key contact and/or review sponsor, as appropriate.

A written report will be prepared and issued by the Chief Internal Auditor or designee following the conclusion of each internal audit engagement and will be distributed to the review sponsor and key contacts identified in the assignment plan for management responses and comments.

Draft reports will be issued by email within 15 working days of fieldwork concluding. The covering email will specify the deadline for management responses, which will normally be within a further 10 days. The management comments and response to any report will be overseen by the review sponsor. Internal Audit will make time after issuing the draft report to discuss the report and, if necessary, meet with the review sponsor and/or key contact to ensure the report is factually accurate and the agreed actions are clear, practical, achievable and valuable.

The internal auditors will issue the final report to the review sponsor and the Director of Corporate Services. The final report will be issued within 10 working days of the management responses being received. Finalised internal audit reports will be presented to the Audit & Risk Committee. Finalised internal audit outputs must be in the hands of the Director of Corporate Services by prescribed dates annually.

The working days set out above are maximum timescales and tighter timescales may be set out in the assignment plan.

The internal audit activity will follow-up on engagement findings and recommendations. All significant findings will remain in an open issues file until cleared.

Audit & Risk Committee

The Audit & Risk Committee meets four times a year, normally in February, May, September and November. Dates for Audit & Risk Committee meetings will be provided to internal audit as soon as they are agreed. The Chief Internal Auditor and/ or Internal Audit Manager will attend all meetings of the Audit & Risk Committee.

Internal audit will schedule its work so as to spread internal audit reports reasonably evenly over Audit & Risk Committee meetings. The annual internal audit plan will detail the internal audit reports to be presented to each Audit & Risk Committee meeting.

The internal auditor will generally present specific reports to the committee as follows:

Output	Meeting
Annual internal audit plan	March
Follow-up report	November and May
Annual report	Мау
Progress report	All meetings

The Audit & Risk Committee will meet privately with the internal auditors at least once a year.

Periodic Assessment

The Chief Internal Auditor is responsible for providing a periodic self-assessment on the internal audit activity as regards its consistency with the Audit Charter (purpose, authority, responsibility) and performance relative to its Plan.

In addition, the Chief Internal Auditor will communicate to senior management and the Audit & Risk Committee on the internal audit activity's quality assurance and improvement programme, including results of on-going internal assessments and external assessments conducted at least every five years in accordance with Public Sector Internal Audit Standards.

Review of Charter

This Charter will be reviewed by both parties each year and amended if appropriate.

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