
Draft Internal Audit Plan 2023-24

Executive Summary

The primary purpose of this document is to set out the Internal Audit plan for 2023-24 for Audit & Risk Assurance Committee (ARAC) approval, which takes cognisance of meetings with management, the chair of ARAC and HCPC's internal quality assurance team.

Previous consideration	The report has been developed with ELT
Decision	The Committee is asked to approve the Internal Audit plan for the year 2023-24.
Next steps	The Committee will receive update reports at each meeting on the progress of the Plan.
Strategic priority	All
Risk	All
Financial and resource implications	The Internal Audit Fee proposed by BDO for 2023-24 is £48,515 excluding VAT.
Author	BDO LLP



**INTERNAL AUDIT STRATEGY & PLAN
2023/24**

HEALTH & CARE PROFESSIONS COUNCIL

**CONFIDENTIAL
STATUS - DRAFT FOR ARAC APPROVAL**

FEBRUARY 2023

Contents

1. Development of the Internal Audit Plan 2022/23	3	B Reserve List	8
2. Management’s responsibility	4	C Internal Audit Strategy for 2022/23 to 2024/25	10
3. External audit	5	D HCPC’s Strategic Risk Register and Proposed IA Coverage	12
4. Reporting & approach	5	E Previous years’ topics for reference	13
5. Quality Control	5	F Internal Audit Quality Assurance	14
A Audit Plan for 2023/24	6		

Document history		Distribution	
Draft for ARAC Approval	24/02/2023	Health & Care Professions Council	[current version]

Author: H Buckingham, W Mitchell, D Bonner
Reviewed by: W Mitchell/S Hillary

1. Development of the Internal Audit Plan 2022/23

Introduction

- 1.1 The Public Sector Internal Audit Standards (PSIAS) and International Internal Audit Standards require the Head of Internal Audit to provide an internal audit strategy and supporting annual internal audit plan. The main requirement in addition to the international standards is that with PSIAS, the Head of Internal Audit is required to give an annual opinion on the organisation's governance, risk management and internal controls. We propose to continue to follow PSIAS because of the wider public interest in HCPC and being consistent with many other healthcare profession regulators.
- 1.2 We have been re-appointed as HCPC's internal auditors. The primary purpose of this document is to set out our internal audit plan for 2023/24 for Audit & Risk Assurance Committee (ARAC) approval, which takes cognisance of meetings with management, the chair of ARAC and HCPC's internal quality assurance team.

Purpose of the internal audit strategy

- 1.3 Our audit strategy underpins our audit plan each year and provides the Chief Executive, ARAC and Council with objective assurance of, and opinions on, the effectiveness of the HCPC's risk management, control and governance arrangements. Internal audit also supports the Executive by advising them on the risk management, control and governance arrangements for which they are responsible. Such advice to line managers adds further value and helps to achieve HCPC objectives.
- 1.4 Our strategy provides a systematic and prioritised review of the HCPC's policies, procedures and operations to inform the Head of Internal Audit's annual opinion and to add value for management. Individual annual audit plans for each year, over a three-year period, deliver the strategy. By prioritising audit resource in this way, HCPC can be assured that the benefits from its investment in internal

audit are maximised and that the focus is on higher risk areas, proportionate to HCPC's risk appetite.

- 1.5 The audit strategy outlines how the Head of Internal Audit will manage internal audit arrangements to enable:
- the provision of an overall annual opinion on risk, control and governance to the Chief Executive and the Audit and Risk Assurance Committee;
 - improvement of the HCPC's risk management, control and governance processes through internal audit work and advice to the Executive;
 - an opinion on 'support' or 'business functions' such as finance, human resources and IT;
 - identification of the required level of audit resource, number and skills, required to meet the internal auditing standards for the UK public sector and the International Professional Practice Framework for internal auditing;
 - effective co-operation with external auditors; and
 - the provision of other assurance and consultancy services by internal audit.

Methodology and risk factors in building the audit plan

- 1.6 We have built the annual audit plan for 2023/24, mindful of:
- HCPC's governance, strategic objectives and business plan;
 - the risk register;
 - its risk appetite;
 - our recently developed assurance map;
 - our assessment of risks;
 - our knowledge of the business;

- change projects;
 - planned work coverage of HCPC's Quality Assurance team; and
 - discussion with senior members of the executive.
- 1.7 At Appendix D we specifically set out HCPC's strategic risks and how these are addressed as part of our Internal Audit activity.

Audit Plan 2023/24

- 1.8 Following meetings with the Senior Management Team and our assessment of the key risks and topic areas, we have produced a full audit plan for 2023/24, which is highlighted in Appendix A. Topics include:
- International registrations
 - Partners oversight, control and governance
 - The new payroll system and IR 35
 - People strategy
 - Regulatory policy development
 - Financial Controls - Procurement
 - Financial Controls - follow up of prior year financial controls reviews
 - Business change and project support, advice and assurance, continuing from the work in 2022/23, subject to the pace of the change activities.
- 1.9 Should the business change work not be required, an item from the reserve list (Appendix B) will be brought in. We have highlighted two items as top contenders with a *:
- Continued professional development
 - KPIs & insights.

Resource requirements

- 1.10 The strategy and annual plan has been drafted giving consideration to the HCPC's budget for internal audit. The audit days indicated in an internal plan should be those considered necessary to provide reasonable assurance to the CEO, the Audit and Risk Assurance Committee and Council on the effectiveness of the HCPC's governance, risk and control processes and provide sufficient work to form the annual internal audit opinion.
- 1.11 The cost for delivery for 2023/24 is £48,515 excl. VAT, which translates into 55 days.
- 1.12 BDO LLP UK has a core group of professionally qualified staff, including CIAA qualified staff, and experienced auditors. Our team is fully attuned with modern internal audit practice and recognised risk and governance standards.
- 1.13 We also have access to other specialists such as tax, an in-house fraud investigation team, risk management specialists, training and systems implementation experts.

2. Management's responsibility

- 2.1 All relevant areas of activity will be included in the internal audit strategy and internal audit plan. However, it should be noted that:
- the CEO has responsibility for maintaining a sound system of internal control that supports the achievement of the organisation's policies, aims and objectives, within a robust financial management framework;
 - it is management's responsibility to determine the extent of internal control in an organisation's systems. They should not depend on Internal Audit as a substitute for effective controls; and

- whilst audit work is planned so that there is a reasonable expectation of detecting significant weaknesses, internal audit procedures alone do not guarantee that fraud will be detected.

3. External audit

3.1 We have established practical processes to ensure effective co-operation with external auditors. We expect to meet with the external auditors at least annually at the planning stage of the external audit work. We will share our plans and reports with the external auditors to avoid duplication of effort and enhance knowledge of risk management and corporate governance within HCPC.

4. Reporting & approach

- 4.1 We will plan our work to ensure that the HCPC receives an effective internal audit service throughout the year. We report at each Audit and Risk Assurance Committee meeting, providing periodic reports to the Audit and Risk Assurance Committee on completed work.
- 4.2 Detailed reports will be provided to management on completion of each audit assignment. The first draft report will be discussed with the relevant line managers to agree the factual accuracy of the findings and the practicality of recommendations agreed.
- 4.3 The final report will be issued following receipt of management comments. Our aim is to produce reports agreed by management and directors prior to submission to and endorsement by the Audit and Risk Assurance Committee.
- 4.4 The Head of Internal Audit will issue regular update reports and an annual report to the Audit and Risk Assurance Committee on the coverage of Internal Audit work

and give an audit opinion on the risk management, control and governance arrangements.

4.5 However, the type of output from our work will differ depending on the type of work we undertake:

- full audit reports for the more major and ‘conventional’ audit assignments;
- ad hoc assignments, feedback on project progress or issues as a project unfolds.

5. Quality Control

5.1 BDO UK Risk Advisory Services Department follows all recognised quality standards for internal auditing. Our audit procedures are designed to ensure the service we deliver is of the highest standard and complies with the IIA’s International Standards for the Professional Practice of Internal Audit. Details of our quality control procedures are given in Appendix F.

A Audit Plan for 2023/24

Theme	Audit Plan Topic	Brief description	Work type	Timing	2023-24 Budget £
Main Delivery					
Registration	Registration assurance processes & international registrants	Our approach is to provide assurance over the efficacy of the second line of defence rather than repeat second line assurances, where the second line is regarded as strong and provides good coverage. Overall, the assurance framework is relatively mature, but there are different procedures and a less-developed assurance framework for registrations from abroad. There have been significant changes in processes, applicant verification is more complex and assessor decisions and quality checks are not subject to the same regime as UK applications.	Audit	Q2/Q3 TBC	5,165
	Partners	There are some 600 partners supported by a small inhouse team. Quality assurance over partner processes is not as well established as processes undertaken by employees. PwC are currently reviewing the partner arrangements, as it is a known area of risk. Given the level of risk and importance, the audit scope will be considered during the year. However, it will complement the work conducted and is likely to provide assurance on a specific aspect of partner work following any changes arising from the current review of partner arrangements.	Audit	Q2	6,800
Policy and Standards	Regulatory policy development	The review would include an audit of the process for regulatory policy and standards consultation - reviewing, updating and dissemination. Considerations will include consulting with stakeholders, and project and quality management of the policy review and update process.	Audit	Q1	5,165
'Enabling' management systems					
Governance, culture & ethics	People strategy	Current market conditions mean that employers are more vulnerable to staff leaving, so the people proposition, succession arrangements and recruitment activities come to the fore. We will review the plans, delivery and impact of the people strategy, with a focus on succession planning, but also include learning and development and the planned revisions to the recruitment system.	Audit	Q2	5,165
Projects	Project management	Continuing our input in HCPC's business change activities, from our work in 2022/23. The amount of advisory work will be determined by the pace of the change programme.	Advisory	Q1-4	5,000
Core functions					
Procurement	Procurement of large contracts	Procurement is inherently a risk area for any business. Many services and regulatory functions are dependent on third parties, to a greater or lesser extent. Good procurement also gives value for money. Excludes services delivered by partners, which are covered in other reviews in this plan. Includes the procurement of Business Central as a case study.	Audit	Q3	5,165
Payroll	IR35 and Payroll	The payroll system is due to be updated in 2023/24, with more payroll administration brought inhouse. IR35 rules are complex and affect organisations who employ or contract with individuals. We will review the controls for payroll and IR35.	Advisory	Q4	6,305
Other					
Follow up	Follow up of previous audit recommendations	Follow-up of previously raised internal audit recommendations. Will include a follow up of financial controls.	Audit	Q4	1,975

Theme	Audit Plan Topic	Brief description	Work type	Timing	2023-24 Budget £
	Internal Audit Plan	The development of the full internal audit plan for 2023/24	-	Q1	1,300
	Audit and Risk Assurance Committees & Client Liaison	Preparing & attending Audit and Risk Assurance Committees & ad hoc advisory	-	All	5,000
	Annual report	Preparation of the Annual Internal Audit Report	-	Q4	1,475
Total excl. VAT for 2023-24 audit work [Prior year]					£48,515 [£47,756]

B Reserve List

Theme	Audit Plan Topic	Brief description	Work type
Main delivery			
Policy and Standards	Regulatory Reform	An advisory review focussing on HCPC's preparedness for any changes in the regulatory framework which governs how HCPC carries out its regulatory activities. Dependency on progress of regulatory reform agenda by Government.	Advisory
Education, Continual Professional Development (CPD)	Continued Professional Development*	CPD for registrants is a core process. As with registrations above, most CPD processes and assurance arrangements are relatively mature. However, again, international registrants' CPD is more complex and less assured. We would evaluate the efficacy of the assurance framework and the controls relating to international registrations.	Audit
KPIs	KPIs & insights*	Test the accuracy, timeliness, relevance, readability of data used in reporting to senior management and Council	Audit
'Enabling' management systems			
Media Handling & Communications	Media handling	An advisory review focussing on media related risks faced by members of Council and Executive leadership in responding to planned or ad-hoc requests from media organisations. With the introduction of Pendragon to support HCPC, the risk has subsided.	Advisory
Media Handling & Communications	Outreach and stakeholder engagement	The professional liaison service is a new investment for HCPC. It is part of the objective to broaden intelligence about the professions and provide professions with an update on developments from HCPC. Given the service is relatively new, we consider it appropriate to review it in 2024/25.	Audit
Governance & Culture	Culture and ethics	A strong organisational and ethical culture allows an organisation to succeed and remain sustainable. This review will be set a high level and evaluate the culture of the Board and the boundaries and lines between the Executive Team and non-executive directors. This review will look at organisational and ethical culture in place at HCPC and the Behaviour Framework. A benchmarking exercise will be performed to assess HCPC's culture against good practice. We recommend this done after the CEO is appointed.	Advisory
CSR	Environmental sustainability	HCPC's sustainability strategy is current in development. Once the road map and plans have been developed, it is useful to have IA specialists in this field to assess the realism of plans and whether they will meet regulatory requirements and HCPC's ambition.	Audit
Core functions			

Theme	Audit Plan Topic	Brief description	Work type
HR	Starters' & leavers' procedures	An audit of Starters' and Leavers' procedures to assess effectiveness of controls to ensure vetting, completion of mandatory training, induction and setting up of salary within HR records, and to include leaving HCPC and removal from IT systems. HCPC are conducting a review currently.	Audit
IT strategy & operations	Digital Strategy	An advisory review of HCPC's Digital Strategy to determine its appropriateness and consistency with HCPC's wider strategic objectives and direction.	Advisory
Data protection & FOI	Data Privacy and GDPR	An audit of HCPC's compliance with the data privacy regulations held within the Data Protection Act 2018, particularly in light of the United Kingdom leaving the European Union.	Audit
H&S	Health and safety	Review of health and safety governance and controls.	Audit
Estates & physical security	Estate planning post covid*	Post-Covid, HCPC uses less office space. It also wants to 'green' its operations and register. The physical estate has been a significant cost to HCPC. The review will examine estates management and long-term estates planning. We will examine environmental sustainability in 2024/25	Audit

* Management consider as primary candidates for inclusion for 2023/24, should another topic drop out, or were likely to fall at the end of 2023/24 and thus at greater risk of slipping into 2024/25

C Internal Audit Strategy for 2022/23 to 2024/25

Subject area	Risk	Audit plan 2022/23	Audit plan 2023/24	Audit Plan 2024/25
Main Delivery				
Registration	Failure to protect public; Failure to be an effective, efficient and agile regulator		End to end register controls International registrations	
Fitness to Practise	As above	Fitness to Practise		
Education, Continual Professional Development (CPD)	As above		CPD	Education
Policy and Standards	As above		Policy Development	
Intelligence & insights	As above			
'Enabling' management systems				
Governance & culture	Failure of governance, leadership or culture		Succession Planning	
Risk Management	As above	Business Assurance Framework	Risk Management	
Media Handling & Communications	As above		Outreach & Stakeholder Engagement	
Strategy & Planning	Failure to be an effective, efficient and agile regulator			
Performance Management	As above			KPI and Performance Reporting
Project Management	As above	Business Change Governance		

Subject area	Risk	Audit plan 2022/23	Audit plan 2023/24	Audit Plan 2024/25
Core functions				
Key financial systems & tax	Poor VFM, fraud risk, unauthorised spend	Registrant Forecasting		Forecasting and Planning
	As above			
Procurement	Poor VFM, fraud risk, unauthorised spend		Procurement of large contracts	
Payroll	Poor staff planning; Breaches of employment law and intended best practice; Poor HR controls		IR35 & Payroll	
HR	As above			
Safeguarding & diversity	As above	Diversity		Safeguarding
Health & Safety	As above		Estate planning post Covid	
Estates & physical security	As above			
Business continuity & DR	Information security			
Fraud & corruption	Poor VFM, fraud risk, unauthorised spend			
IT strategy & operations	Information security	Cyber Security and IT BCP		
Data protection & FOI	Information security			

D HCPC's Strategic Risk Register and Proposed IA Coverage

Strategic Risk	Proposed Internal Audit Coverage
<p>Our performance does not improve to a standard that enables us to achieve all the PSA standards of good regulation. In seeking to meet these standards we lose focus and lose standards in other areas.</p>	<p>While FtP processes are undoubtedly a key element of the PSA's standards, and it is right that audit focus on this area of HCPC activity continues, other core functions including registration, continued practice (largely revalidation), and the regulation of education must still be regularly reviewed to ensure ongoing compliance as part of our audit approach. We include coverage of all of these elements during a cycle in our audit strategy.</p> <p>We also include the customer service and complaints -registrants and the public - the ease of use of systems etc. - in our reviews.</p>
<p>The HCPC's regulatory expectations are not appropriate or not understood by registrants and other stakeholders</p>	<p>HCPC expectations can be made clear and readily accessible through appropriately written and readily accessible guidance. We have conducted several reviews at the GMC, for example, on their communication style, techniques and tone of voice, and the reworking of their website guidance into a user-centred content approach.</p> <p>As part of our three-year audit strategy we conduct policy development, stakeholder engagement and safeguarding.</p>
<p>We are unable to harness the benefits of the wealth of data we hold (benefits - better regulatory decisions, prevention, workforce planning, influencing the agenda)</p>	<p>The importance of using intelligence to target limited regulator resources, and to avoid emerging risks and issues becoming significant on the general public, is an important aspect of modern regulation. Intelligence on trends, registrant profiles, location, etc. and intelligence on individual registrants is vital. A regulator not 'joining the dots' with the information it holds, or has ready access to, or can establish proactively through interaction with others in the 'system', is a significant risk to a regulator's credibility.</p> <p>The HCPC is seeking to improve its intelligence capability with effective analysis and drawing conclusions on its registrants' data. This includes improving their intelligence capabilities, better interaction with other bodies, more structured data, better use of outreach, stakeholder engagement and media scanning, improved data pooling, using the National Intelligence Model, being more proactive and using cross-professional referrals. As part of our proposed plans we will evaluate the ways to feed intelligence into regulatory decision-making processes, so the right intel goes to the right organisational place, at the right time. We also consider the regulatory levers that can best be applied - e.g. targeting individuals, cohorts, policy, guidance changes.</p>
<p>We do not understand our stakeholder's needs and so are unable to be the regulator they (the wider system) need</p>	<p>Being trusted means being good at delivering the core functions - accurately, timely. However, there are more elements of trust and expectation - e.g. fairness, proportionality. Stakeholder engagement and good communication is key, and understanding stakeholder needs and expectations is critical to ensure any organisation is governed in a way which aligns with those expectations, and we include these elements within our planned audit coverage.</p>
<p>The resources we require to achieve our strategy are not in place or are not sustainable</p>	<p>The cost of running HCPC needs to hold registration fees and provide an effective service to registrants and the public. We understand this having completed a recent review of HCPC's financial modelling. Further audits are planned on registrant forecasting and business planning.</p>
<p>We are unable to demonstrate the value of regulation due to negative experiences of our regulation in practice</p>	<p>Our audit strategy approach is to target, each year, at least one topic focussed on how HCPC carries out its regulatory functions. We frame these around Registration, Fitness to Practise and Education.</p>

E Previous years' topics for reference

2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16
Fitness to Practise	Education	Registration end to end	Fitness to practise - end to end process	186 KPR building project	Continuing professional development	Payroll	Whistleblowing
Business Assurance Framework	Registrations payment processes	Fitness to Practise - follow-up	Transfer of social workers to new body	Fees review (commissioned outside audit plan)	Cyber security	Property management	5 year plan model
Business change governance	Risk Management Framework	Intelligence Gathering	Quality Assurance Function	Follow up of recommendation implementation	Follow up of recommendation implementation	Employee recruitment and retention	Public consultations
Registrant forecasting	Key Financial Controls - Bank and Cash	Reshaping the Organisation	Assurance framework & mapping	FTP improvement plan	Budgeting forecasting and key financial controls	follow up on 5 year plan model audit	Review of the registration project (design phase)
Diversity	Safeguarding	PSA & Internal Reporting	Procurement	SW transfer project governance		Partner recruitment	Core financial controls
Cyber / IT BCP		Payroll	Business continuity planning	Registration project phase 1		registration appeals	
Key Financial Controls		Financial Modelling	Fraud Risk Assessment	Strategic and operational planning		Non-case preparation and presentation legal services cost management	
		IT General Controls		Core financial Controls		Core financial controls	

F Internal Audit Quality Assurance

Quality control and quality assurance is under review following the merger with BDO. Our quality assurances will be updated during the year.

Current quality assurance processes and procedures	
Procedures	Our audit procedures were designed to ensure the service we deliver is of the highest standard and complies with the Public Sector Internal Audit Standards (PSIAS). We utilise specially designed internal audit software Pentana to conduct our work and all reports are subject to review by a senior manager (stage 1) and director or partner (stage 2). All reports are also now checked for proofing errors at the draft and final report stage by another staff member.
Knowledge Library*	Our audit testing programmes and good practices we find are imported into our Knowledge Library. The Knowledge Library is part of our Pentana audit workflow system and enables auditors to see examples of best practice across our client base. This enhances the quality of our audit work - understanding the features of best practice in the areas under audit and also auditing techniques applied. It also includes some standardised reporting templates.
Professional training, CPD and development	Staff are suitably professionally qualified or working towards a qualification. There is a full programme of continuing professional development and training provided by BDO LLP and to specific members of the BDO LLP relating to internal audit, risk management and governance.
Quality assurance improvement programme (QAIP)	BDO LLP has an internal audit Quality Assurance Improvement Programme (QAIP). Such a programme is a requirement of PSIAS and international internal auditing standards. It ensures that any issues identified by the quality processes are assigned actions and resolution is monitored. Specific improvements required are directed to the relevant person - generic changes to processes are recorded and tracked using the firm's internal audit cluster group.
Customer satisfaction survey - individual assignments*	We will be introducing online satisfaction surveys once an audit is completed. These can be issued in batches so audit leads only receive one survey or per audit.
BDO client care programme	Firm-wide satisfaction survey which benchmarks our service against the firm and the industry, conducted by an independent external company on behalf of BDO. Introduced in 2017.
Hot review*	Peer review of a selection of audits to ensure each client receives the same high standards of audit work.
Cold review	The BDO LLP Governance, Risk and Assurance Group conducts an internal 'cold review' of its internal audit working practises, reports and files annually. The review is conducted annually and was last conducted in 2020/21. The findings feed into the QAIP.
Self-assessment against PSIAS	Brings together the individual assessments against the Public Sector Internal Audit Standards (PSIAS) - last conducted in 2018.
External review	A full EQA is being conducted in 2020/21 under BDO LLP, previously in 2015/16.

FOR MORE INFORMATION:

SARAH HILLARY
Sarah.Hillary@bdo.co.uk

Bill Mitchell
Bill.Mitchell@bdo.co.uk

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