

Police and Crime Commissioner for Gwent and Chief Constable Gwent Police

Indicative Audit Strategy 2024/27 and Annual Plan 2024/25

March 2024

Draft



Executive Summary

Introduction

The Audit Plan for 2024/25 has been informed by a risk assessment carried out across our clients in the sector and by an updated audit risk assessment to ensure that planned coverage for the year is focussed on the key audit risks. This coverage will enable a robust annual Head of Internal Audit Opinion to be provided.

Key Risk Considerations

We have identified a number of key areas which require consideration when planning internal audit coverage.

Police and Crime Commissioner Elections are due to be held in May 2024. The outcome of the elections will impact on the Police and Crime Plan and policing priorities for the Constabularies.

Vetting HMICFRS' inspection into police vetting in the wake of the Sara Everard case found that it was falling well below the standards required. It identified that cultural shortcomings were prevalent in all of the forces inspected and warning signs that were not acted upon. This continues to be an area of risk across forces.

Climate change and Sustainability Global warming can lead to physical, operational, financial and reputational risks arising. 'Loss and damage' - the phrase used to describe the destruction being wrought by the climate crisis - will remain high on the agenda. Financial challenges will impact on the ability to meet the climate change and sustainability expectations.

Workforce The changing nature of crime, skills required and utilisation of the workforce to tackle this, along with financial pressures drives how the workforce is shaped.

Audit Strategy Methodology

In producing this audit strategy and annual plan, we have sought to build on our understanding of Police and Crime Commissioner for Gwent and Chief Constable Gwent Police operating environment and risk profile through a review of key documentation and discussions with key staff. We have taken into account:

- Police and Crime Commissioner for Gwent and Chief Constable Gwent Police's ("Gwent Police") business strategy and corporate objectives;
- The regulatory and legislative framework;
- Police and Crime Commissioner for Gwent and Chief Constable Gwent Police's risk register;
- Requests for collaborative audits;
- External Audit recommendations;
- Previous Internal Audit coverage.

We take in to account any emerging or heightened risks that are facing the sector, to ensure that the work of internal audit remains appropriately prioritised and focused. Links to specific strategic risks are also contained in the Internal Audit Strategy.

Our approach complies with the International Standards for the Professional Practice of Internal Auditing which have been developed by the Institute of Internal Auditors (IIA) and the Public Sector Internal Audit Standards (PSIAS).

Internal Audit Strategy and Plan

The Audit Strategy at Appendix A incorporates the proposed annual plan for 2024/25 and the indicative coverage for the following two years.

The Annual Plan at Appendix B sets out the assignments that will be carried out in 2024/25, the planned times and the high-level scopes for each of these assignments.



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

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

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

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

Adequacy of the planned audit coverage

The reviews identified in the audit plan for 2024/25 support the Head of Internal Audit's annual opinion on the overall adequacy and effectiveness of Police and Crime Commissioner for Gwent and Chief Constable Gwent Police's framework of

governance, risk management and control as required by TIAA's charter. The reviews have been identified from your assurance framework, risk registers and key emerging themes.

Disclaimer

This document has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent.

No responsibility to any third party is accepted as the document has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this document and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our document.

Release of Report

The table below sets out the history of this plan.

Draft Strategy and Plan:	12 th March 2024
Final Strategy and Plan:	



Appendix A: Rolling Strategic Plan

Review Area	Review Area	Туре	Period of Last Audit / Assurance Opinion	2024/25	2025/26	2026/27
Governance						
Business Continuity Management	All	Assurance	2021/22	10		
Strategic Planning	All	Assurance	2023/24		8	
Risk Management	All	Assurance	2023/24	**	**	**
ICT reviews are carried out by Torfaen County Borough Council						
Finance						
Budgetary Control	All	Assurance	2023/24		5	
General Ledger	All	Assurance	2022/23	5		
Pensions	All	Assurance	2023/24			5
Expenses and Additional Payments	All	Assurance	2023/24		5	5
Fixed Assets	All	Assurance	2022/23		5	
Capital Programme	All	Assurance	2022/23	5		
Payroll	All	Assurance	2023/24	**	**	**
Debtors	All	Assurance	2023/24			**
Counter Fraud	All	Assurance	2023/24		**	**
Creditors	All	Assurance	2023/24	**	**	**
Treasury Management	All	Assurance	2023/24			**
Operational Review						
Estates Management – Strategy	All	Compliance	2022/23	7	7	
Estates Management - Delivery	All	Compliance	2021/22			7
Fleet Management – Repairs and Maintenance	All	Compliance	2019/20		5	
Fleet Management – IR3 Telematics	All	Assurance	2023/24			**
Contract Management	All	Advisory	2023/24	6	6	6



Review Area	Review Area	Туре	Period of Last Audit / Assurance Opinion	2024/25	2025/26	2026/27
Local Policing – Property and Cash – Proceeds of Crime Act 2002 (POCA)	All	Compliance	2023/24	6		6
Property and Cash	All	Assurance	2022/23		6	
Vetting	All	Compliance	2021/22	6		
Service Improvement Board	All	Appraisal	2023/24		8	10
Social Media	All	Assurance	2022/23		7	
Data Protection Act	All	Assurance	2023/24			**
Joint Scientific Investigation Unit	All	Compliance	2023/24			**
Firearms Licensing	All	Assurance	2023/24			**
Organisation Review						
HR Management – Recruitment and Training	All	Assurance	2023/24			
HR Management – Absence Management	All	Assurance	2021/22	7		
HR Management – Strategy	All	Assurance	Pre 2019/20		6	
HR Management – Skill Map and Planning	All	Assurance	N/A	7		
Occupational Health – Referral, Process and Cost	All	Assurance	N/A	6		
Whistleblowing	All	Assurance	2019/20	7		
Office of the Police and Crime Commissioner						
Complaints Handling (OPCC)	All	Assurance	2023/24		4	
Commissioning	All	Assurance	2023/24			7
Collaborative Reviews						
Payroll (Lead Force: ??)	All	Assurance	2022/23	5	6	6
Debtors (Lead force: Dyfed-Powys)	All	Assurance	2023/24		6	6
Counter-Fraud (Lead Force: North Wales)	All	Compliance	2023/24		6	6
Data Protection Act (Lead Force: Gwent)	All	Assurance	2023/24			6
Telematics (Lead Force: South Wales)	All	Assurance	2023/24			4
Creditors (Lead Force: Dyfed-Powys)	All	Assurance	2023/24	6	6	6
Risk Management (Lead Force: ??)	All	Compliance	2022/23	5	5	5



Review Area	Review Area	Туре	Period of Last Audit / Assurance Opinion	2024/25	2025/26	2026/27
Treasury Management (Lead Force: North Wales)	All	Assurance	2023/24			5
HR Management – Recruitment and Training (Lead Force: South Wales)	All	Assurance	2023/24			6
Joint Scientific Investigation Unit (Lead Force: South Wales)	All	Assurance	2023/24			6
Firearms Licencing (Lead Force: Gwent)	All	Assurance	2023/24			6
Information Disclosures (Lead Force: Gwent)	All	Assurance	2023/24			6
Sustainability (Lead Force: ??)	All	Assurance	N/A	6		
ISO Accreditation (Lead Force: ??)	All	Compliance	N/A	6		
Connect Teams Channels (Lead Force: ??)	All	Assurance	N/A	6		
Uniform Stores (Lead Force: ??)	All	Assurance	N/A	6		
Health and Safety (Lead Force: ??)	All	Compliance	N/A	6		
Contingency						
Contingency				2	19	6
Management and Planning						
Follow Up	All	Follow Up		10	10	10
Liaison with Audit Wales	All	Management		2	2	2
Annual Planning	All	Management		4	4	4
Annual Report	All	Management		4	4	4
Audit Management	All	Management		15	15	15
Total Days				155	155	155

Note: ** Denotes included as a collaborative review

Assurance Opinion

Pending
Substantial
Reasonable
Limited
No Assurance



Sample of Advisory Reviews Available in addition to the audit plan

Below is a list of reviews which are undertaken by our Specialist Staff and are available in addition to the plan should they be required.

Review	Indicative High Level Scope
Website Penetration Test	Web application penetration testing is the practice of simulating attacks on a system in an attempt to gain access to sensitive data, with the purpose of determining whether a system is secure. This is done in a safe and secure way with a report identifying weaknesses and remedial action.
Governance Effectiveness Reviews	The review will consider the Senior Managements effectiveness - including whether it has the structure, processes, people and performance to deliver. The review will also consider how they interact with stakeholders, and whether respective roles are clear.
Climate Change	Deep Dive into selected aspects of climate change using a qualified subject matter expert.



Appendix B: Collaborative Annual Plan – 2024/25

Quarter	Review	OPCC/ Constabulary	Туре	Days	High-level Scope
1	Risk Management		Assurance	5	To be confirmed (TBC) Lead force: TBC
1	Sustainability		Assurance	6	To be confirmed (TBC) Lead force: TBC
1	ISO Accreditation		Assurance	6	To be confirmed (TBC) Lead force: TBC
2	Connect Teams Channels		Assurance	6	To be confirmed (TBC) Lead force: TBC
2	Uniform Stores		Assurance	6	To be confirmed (TBC) Lead force: TBC
2	Health and Safety		Compliance	6	To be confirmed (TBC) Lead force: TBC
			Total days	35	

Quarter	Review	Туре	Days	High-level Scope
1	Proceeds of Crime Act 2002 (POCA)	Assurance	6	The review will consider the administration and secure retention and release of cash seized under the Proceeds of Crime Act 2002 (POCA).
1	HR Management – Absence Management	Assurance	7	The review will consider the arrangements for: recording, reporting and monitoring absence and the arrangements in place to promote wellbeing and reduce absence. The review will not consider the wider arrangements within Force to deliver the wellbeing strategies and aims.



Quarter	Review	Туре	Days	High-level Scope
2	Business Continuity Management	Assurance	10	The review will consider the effectiveness of the programme of work in relation to emergency preparedness, resilience and response. In summary, this will cover the following areas: roles and responsibilities, corporate and department plans, major incident training, emergency plan testing, liaising with partner agencies, risk management, performance monitoring, staff wellbeing and lessons learned for ongoing business continuity.
2	Contract Management	Compliance	6	The review will consider the effectiveness of the contract management arrangements in relation to a selected contract. This will include consideration of financial management and administration, contractor performance, quality and monitoring of delivery.
2	Vetting	Assurance	6	The review will focus on the systems and processes for vetting new and existing staff, officers and contractors. The review will also look to ensure that individuals are vetted to the appropriate level and controls are in place to ensure that vetting is undertaken at the required frequency. The audit will focus on the following key areas: Policies and procedures. Governance arrangements. Monitoring and identification of staff that require vetting to ensure that vetting remains in date. Appropriateness and timeliness of vetting.
2	HR Management – Skills Map and Planning	Assurance	7	The review will consider the arrangements for assessing and mapping skills and competencies within Force, to identify gaps and to take action to address organisational need. The review will not consider administration of recruitment processes to specialised roles identified thorough through skills mapping or delivery of associated training programmes.
2	Occupational Health – Referral, Process and Cost	Assurance	6	 The review will consider the arrangements in place for the referring Police staff and officers to the Occupational Health, compliance with the Foundation Occupational Health Standards for Police Forces, and the financial management and oversight of costs associated occupational health referral. Areas to be considered include: Maintenance of associated Occupational Health policies and procedures to policies required for compliance with the Foundation Occupational Health Standards for Police Forces. Review of governance arrangements inn place for oversight and monitoring of Occupational Health referrals and outcomes. Sample testing to confirm that procedures are being followed. The financial management and oversight arrangements in place in relation cost control and ensuring value for money is obtained from the service provided.



Quarter	Review	Туре	Days	High-level Scope
2	Whistleblowing	Assurance	7	The review will also consider the College's Whistleblowing Policy ensuring it is effectively communicated and that any allegations reported through the whistleblowing route are treated in accordance with the policy. This review will consider the Force's Whistleblowing arrangements and will focus on policies and procedures covering Whistleblowing, the arrangements in place to ensure the Force complies with the requirements of the Public Interest Disclosure Act 1998, the guidance in place for staff to report any suspected wrongdoing and arrangements to ensure staff are made aware of this, the controls in place to ensure employees who blow the whistle through the correct channels regarding a wrongdoing which is within the public interest are afforded appropriate protection, the arrangements in place to investigate any concerns raised by employees under the whistleblowing remit, any remedial action taken in relation to any control weaknesses identified during the investigative process and the arrangements for reporting to the Board and/or relevant sub-committee on whistleblowing concerns raised by employees and the outcome of their respective investigations. The review will not consider the appropriateness of the outcomes of investigations or actions taken to address wrongdoing.
3	General Ledger	Assurance	5	The review considers the arrangements for providing an effective audit trail for data entered onto the general ledger and the appropriateness of the reports generated. The scope of the review does not extend to the budgetary control arrangements and bank reconciliations.
3	Payroll	Assurance	5	The review considers the arrangements for: the creation, amendment and deletion of payroll records accurately and on a timely basis; payment of allowances and pay awards; collection of overpayments; and payment of salaries. The review will also consider the arrangements for reviewing the payroll prior to authorisation including the review of exception reports and pay variations. The scope of the review does not include determination of salary scales, the HR arrangements for appointment and removal of staff, severance payments or reimbursement of travel and subsistence expenses, or pension arrangements.
3	Creditors	Assurance	6	The review considers the arrangements for reviewing and authorising and paying costs incurred by the organisation and the arrangement for control of the organisation's cheques and automated payments. The review will consider the management of amendments to supplier standing data, including the verification of requests for change of bank details. The allocation and use of procurement cards will also be considered including the month end reconciliation to statements. The scope does not include providing an assurance that the expenditure was necessary or that value for money was achieved from the expenditure committed.



Quarter	Review	Туре	Days	High-level Scope
4	Capital Programme	Assurance	5	The review considers the arrangements for accounting for the capital programme including preparation and approval of capital programmes, the governance and oversight arrangements for delivery of capital programmes, departmental monitoring of capital programme spend, the monitoring, authorisation and reporting of changes to and slippage within programmes, and identification, recording and accounting for capital spend. The scope of the review does not include consideration of the funding arrangements for the capital programme or the specification and delivery of individual capital projects.
4	Estates Management – Strategy	Assurance	7	 The review will consider the governance arrangements for the delivery of the outcomes in the Estate Strategy. The scope will include how the Strategy is developed, compiled, configured and monitored. The audit will consider: The process for evaluating the estate including the physical condition, functionality, space utilisation; statutory compliance and environmental issues prior to developing or updating the strategy; How the estate strategy supports the needs and objectives set out in the Commissioner's Police and Crime Plan and the environmental strategy; The implication of service delivery on the estate and the actions needed to achieve these; The review and approval process.
2	Follow Up - Interim	Follow Up	5	Follow-up of implementation of agreed priorities one and two actions from audit reports, ensuring the Organisation is implementing recommendations, and providing reports to the Joint Audit Committee.
4	Follow Up – Year End	Follow Up	5	Follow-up of implementation of agreed priorities one and two actions from audit reports, ensuring the Organisation is implementing recommendations, and providing reports to the Joint Audit Committee.
1-4	Collaborative Audits (Appendix B)		35	To be populated once agreed by the four forces. See Appendix B.
NA	Contingency		2	To be used as required.
1-4	Liaison with Audit Wales	Management	2	Days for allocation to collaborative audits or for use as required during the year.
1	Annual Planning	Management	4	Assessing the Police and Crime Commissioner and the Chief Constable's annual audit needs.
4	Annual Report	Management	4	Reporting on the overall conclusions and opinion based on the year's audits and other information and providing input to the Annual Governance Statement.
1-4	Audit Management	Management	15	This time includes: meeting client management, overseeing the audit plan, reporting and supporting the Joint Audit Committee, liaising with External Audit and Client briefings (including fraud alerts, fraud digests and committee briefings).
		Total days	155	



Internal Audit Charter

The Need for a Charter

The Audit Charter formally defines internal audit's purpose, authority and responsibility. It establishes internal audit's position within Gwent Police and defines the scope of internal audit activities. The establishment of the Audit Charter is a requirement of the Public Sector Internal Audit Standards (PSIAS) and approval of the charter is the responsibility of the Joint Audit Committee.

The Role of Internal Audit

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

Standards and Approach

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

Scope

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

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

Access

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

Independence

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

To preserve the objectivity and impartiality of TIAA's professional judgement, responsibility for implementing audit recommendations rests with Gwent Police management.

Conflict of Interest

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

We are not aware of any conflicts of interest and should any arise we will manage them in line with TIAA's audit charter and internal policies, the PSIAS/IIA standards and Gwent Police's requirements.

Irregularities, Including Fraud and Corruption

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

TIAA will be informed when evidence of potential irregularity, including fraud, corruption or any impropriety, is discovered so that TIAA can consider the adequacy of the relevant controls, evaluate

the implication of the fraud on the risk management, control and governance processes and consider making recommendations as appropriate. The role of TIAA is not to investigate the irregularity unless commissioned to do so.

Limitations and Responsibility

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

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

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

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

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

Liaison with the External Auditor



We will liaise with Gwent Police's External Auditor. Any matters in the areas included in the Annual Plan that are identified by the external auditor in their audit management letters will be included in the scope of the appropriate review.

Reporting

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

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

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

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

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

Assurance Assessment Gradings

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

Substantial Assurance There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.

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

Data Protection

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

Quality Assurance

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

Joint Audit Committee Responsibility

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

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

Disclaimer

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

Performance Standards

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

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

