1. Acceptance of the BET Policy and Procedures Committee Minutes of May 11, 2018

Upon a motion by Mr. Ramer, seconded by Mr. Mason, the Committee voted 2-0 to approve the May 11, 2018 Meeting Minutes, as amended.

2. For consideration and vote upon amendments to the Internal Audit Policy (P. 30) of the Policies & Procedures tab of the Board of Estimate and Taxation Reference Book 2018 – 2020 being proposed by unanimous vote of the BET Audit Committee

Mr. Ramer presented a proposed revised Internal Audit Policy (annexed), intended to replace the version currently appearing at pages 30 and 31 of the new BET Reference Book. Mr. Ramer reported that the revision presented is that approved by the Audit Committee (4-0), to which Mr. Ramer had made certain textual revisions as marked in red ink, and that the red ink markings had been circulated to the members of the Audit Committee and others. He indicated that he has understood from the Audit Committee chair and from the BET chair that they have no objections, and no one else has commented on the proposed red ink changes sent to them. The annexed is that revision, incorporating the red ink changes.

Mr. Mason commented that the proposed revision is acceptable to him, with the red ink marked changes. He commented, however, that he believed that the proposed revision comes from the Audit Committee in a context of a regrettable undercurrent at the Audit Committee specifically and at the BET generally, which has been causing him some concern, but that he would support the proposed revision nevertheless, as an improvement over the current text.

Mr. Ramer moved and Mr. Mason seconded a motion that the BET Policies & Procedures Committee approve and recommend to the full BET the annexed proposed revision, to replace the Internal Audit Policy currently appearing at pages 30 and 31 in the new BET Reference Handbook. The motion was approved by a vote of 2-0.

The Committee requested Ms. Brown to produce a clean Internal Audit Policy document, with the above stated changes, for presentation at the June 18, 2018 regular BET Meeting.

3. Adjournment
The meeting was adjourned at 4:21 P.M.
INTERNAL AUDIT POLICY FOR THE
TOWN OF CONNECTICUT

INTRODUCTION:

Internal Auditing is an independent and objective function that encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the Town of Greenwich, Connecticut (hereafter referred to as the Town) governance and internal controls. Internal Audit also serves to conduct other examinations to achieve the Town's goals and objectives.

ROLE:

The Internal Audit function exists within the Town's Finance department and is established by the Town's Board of Estimate and Taxation (hereafter referred to as the BET) under authority of Article I, section I, of the Town Charter. Internal Audit's responsibilities are defined by the BET and its Audit Committee as part of the BET's administration of the financial affairs of the Town.

PROFESSIONALISM:

Internal Audit will be governed by best practices of professional auditing, including guidance by The Institute of Internal Auditors' – the Definition of Internal Auditing, the Code of Ethics, and the *International Standards for the professional Practice of Internal Auditing (Standards).* In addition, Internal Audit will adhere to the Town's policies and procedures.

AUTHORITY:

Internal Audit, with strict accountability for confidentiality and safeguarding records and information, is authorized full, free, and unrestricted access to any and all of the Town’s records, physical properties, and personnel pertinent to carrying out any engagement within the scope of the law. All Town officials and employees are requested to assist Internal Audit in fulfilling its roles and responsibilities. Internal Audit will also have free and unrestricted access to the BET, normally through its Audit Committee.

ORGANIZATION:

Internal Audit will report functionally to the BET, normally through its Audit Committee, and administratively to the Comptroller of the Finance Department. Internal Audit normally will communicate and interact directly with the Audit Committee, including in executive sessions and in between Audit Committee meetings, as appropriate.

INDEPENDENCE AND OBJECTIVITY:

The Internal Audit function will remain free from interference, including matters of audit selection, scope, procedures, frequency, timing, or report content to maintain necessary independence and objectivity.

The internal auditor will have no direct operational responsibility or authority over any of the activities audited. If the internal auditor is to be engaged to implement internal controls or otherwise engage in an activity that typically falls under the purview of management, the internal auditor cannot audit that area for a period not less than two years from such date unless
authorized by the BET in order to ensure the internal auditor's functional independence and objective judgment.

The internal auditor will exhibit the highest level of professional objectivity in performing his or her duties and will make a balanced assessment of all the relevant circumstances and not be unduly influenced by personal interests or by others in forming judgments.

INTERNAL AUDIT PLAN:

At least annually, Internal Audit will submit to the BET through its Audit Committee an internal audit plan for review and approval. The internal audit plan will consist of an audit approach, schedule, budget and resource requirements.

The internal audit plan will be developed based on the prioritization of the risk areas using a risk-based methodology, including input of the Finance Department, senior management, and the BET. Internal audit will review and adjust the plan, as necessary, in response to changes in the Town’s business, risks, operations, programs, systems, and controls. Any significant deviation from the approved internal audit plan will be communicated to the BET through its Audit Committee.

REPORTING AND MONITORING:

A written report will be prepared and issued by the internal audit following the conclusion of each internal audit engagement. Internal audit reports will also be presented to the Audit Committee and the BET in their regularly scheduled meetings.

The internal audit report will include management’s response and corrective action taken or to be taken in regard to the specific findings and recommendations. Management’s response, should include a timetable for anticipated completion of action to be taken and an explanation of any corrective action that will not be implemented.

Audit reports will be released and posted to the Town’s website, unless withheld for proper public purpose and in accordance with the Connecticut General Statutes (cf. §1-210).