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# Developing a Training Programme in Value for Money Audit

Strategic Paper by  
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DOMINICA • CANADA

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## Executive Summary

Establishing a training vision/policy and a Value-for-Money (VFM) training programme in the Audit Department in the Commonwealth of Dominica would enhance the credibility of the Office by having a standard methodology and a consistent approach to conducting audits, writing reports and reducing audit risks.

The Office has been conducting informal training for VFM auditing on an ad hoc basis, primarily done by the immediate supervisors. The introduction of a structured training programme would empower and motivate the officers and enhance the image of the Office with Parliament, the entities and the taxpayers.

The aim of this paper is to lay down the foundation for setting up a training vision/policy and developing a VFM training programme in the Audit Department of the Commonwealth of Dominica, using the experience and knowledge gained during the Fellowship Program and the feedback received from the Audit Department.

The need to improve VFM auditing in the Audit Department is a result of the focus of the Director of Audit /Auditor General (Director of Audit) on re-organizing the Projects/VFM Section and assigning officers to the Section, requests from Parliament, Aid and Donor Agencies, and the taxpayers for accountability and good governance.

The strategy in implementing this initiative would be to establish a training vision/policy and develop a structured programme that would meet the needs of the Office and have the support of the Director of Audit. This would be done after a review of the manuals and methodologies and the subsequent updating of these documents, reflecting the standard practices being used by the Office of the Auditor General (OAG) in Canada and other International Organization of Supreme Audit Institutions (INTOSAI) members and the assessment of the training needs.

The expertise of the Establishment, Personnel and Training Department (EPTD) would be sourced in developing the course structure and contents in conjunction with a proposed Management Committee. The knowledge and practical experience gained in the survey/ planning stage, examination stage, interviewing techniques, the use of electronic tools and reporting while in Canada would also be used in the course contents.

A pilot audit would be conducted after the initial training period and would be done over a six-month period with the approval of the Director of Audit. Some of the criteria for selecting the audit would be based on the following:

- the entity's business risks,
- audit risk,
- auditability,
- political sensitivity,
- relevance and significance.

There are favourable factors, such as the government's thrust in training and the Director of Audit's focus on improving the Office capability in conducting VFM audits, which point to positive reasons for undertaking this project. Likewise, there are a few constraints that could delay the implementation of this project, including and mainly, the lack of financial and technical resources, which are critical to achieving this goal. Those constraints could be reduced with the use of available resources both at the Office and other Departments.

This project is expected to be beneficial to the Office and staff as it will enhance the credibility of the Office, improve the ability to conduct VFM audits, create a consistent approach, minimize audit risks and empower staff.

# DEVELOPING A TRAINING PROGRAMME IN VALUE-FOR-MONEY AUDIT FOR THE AUDIT DEPARTMENT OF THE COMMONWEALTH OF DOMINICA

## 1.0 Introduction

This paper highlights the knowledge and experience gained in Value-for-Money (VFM) audit during the Fellowship Program in Canada.

My aim is to develop a training programme that would improve VFM in the Audit Department of the Commonwealth of Dominica. This will be achieved by reviewing and updating existing manuals and methodology; establishing a Management Committee, training vision/policy and a structured programme; and conducting VFM audits on my return to the Commonwealth of Dominica.

## 2.0 Goal

The focus of this paper is to meet the goal of the Audit Department of the Commonwealth of Dominica to establish a training vision/policy and develop a sustainable training programme that will improve its ability to carry out more effective VFM audits. This would assist in promoting increased accountability and good governance practices throughout Government by ensuring due regard to economy, efficiency, effectiveness and the environment, and that a standard methodology is used in conducting and reporting on audits of programmes/projects, with the relevant tools available.

## 3.0 Background of SAI

The Audit Department of the Commonwealth of Dominica is mandated under *Section 89 (1) of the Constitution of the Commonwealth of Dominica*. The Director of Audit/Auditor General (Director of Audit) reports to Parliament through the Minister of Finance. He also has the authority to submit his reports to Parliament, through the Speaker, if the Minister fails to lay the report before the House of Assembly within the time stipulated in the *Constitution* and *Audit Act*. The Director of Audit, who was posted to the Office in 1997 and appointed in January 1999, has re-introduced value-for-money auditing, referred to as "special audits", from 1998 as one of his priorities. He has assigned officers, including myself as Team Leader, to the VFM/Projects Section, with a vision to acquire the expertise to conduct such audits. This has led to the Director of Audit seeking technical and financial assistance for training of the officers. In recent years there has also been a demand from Parliament, Donor Agencies and the public for accountability, assurance and good governance, which strengthens the Director of Audit's focus.

### 3.1 Current Mandate

The Audit Department has been mandated to carry out audits in accordance with *Section 83 (2), (3) of The Constitution of the Commonwealth of Dominica, The Finance (Administration) Act No.4 of 1994, Financial Regulations – Chapter 63:01, Financial (Stores) Regulations* and the *Audit Act No. 5 of 1994*.

The Office currently conducts audits as required by *Section 17 of The Finance (Administration) Act*, in conjunction with the *Regulations* and the *Audit Act* in the following areas:

1. Attest Audit ( annual financial audit of the Public Accounts)
2. Audits of special programmes of the various Government Departments and Agencies
3. Local Government entities
4. Audits of projects funded by Government and Donor Agencies
5. Special Audits of Statutory Bodies

The areas stated in Nos. **2** to **5** above can be considered as potential VFM audits.

### **3.2 Status of Value for Money audit**

The Director of Audit has the mandate to conduct VFM audits in accordance with *Section 6 (2) and (3) of the Audit Act No. 5 of 1994 (Note 1 in Appendix 2)*, with *Section 7 (1) (Note 2 in Appendix 2) of the Act*, which makes the provision for the submission of a special report to the Minister of Finance on any matter of importance or urgency.

VFM audits, referred to as “special audits”, are currently being done in a limited manner, mainly by elaborating on matters discovered during operational activities and financial audits. The audit teams use manuals that were developed and written with information obtained from the International Organization of Supreme Audit Institutions (INTOSAI), the Caribbean Organization of Supreme Audit Institutions (CAROSAI) and manuals of other Supreme Audit Institutions (SAI). The manuals were last updated in 1985 after the current Director of Audit participated in the CCAF Fellowship Programme at the Office of Auditor General in Canada.

The Officers currently assigned to the Projects (VFM) Section lack formal training in conducting effective value-for-money audits but rely on their qualifications, knowledge and experience of the Public Service accounting system. The manuals and methodology are used with the guidance of the Director of Audit in conducting these audits; however, the application of the methodology has been done primarily based on the existing practices. The audits are not subjected to a quality review to determine whether they were conducted in accordance with the methodology, which does not give an opportunity to have lessons learned taken into consideration in the auditing process. This review is being proposed to be part of the audit process, as stated in paragraph **6.2**.

### **3.3 Rationale for VFM audit**

Value-for-money audit is required at this time as the Director of Audit has decided to focus on VFM/Performance auditing as one of his priorities. This is due to the following factors:

- (a) Parliament has been requesting good governance and accountability of the Government.

- (b) Aid Donors and Agencies are requesting that performance auditing be done for funded programmes.
- (c) There has been emphasis on VFM auditing by INTOSAI'S membership.
- (d) The taxpayers have been making demands for accountability of the Government.

#### **4.0 Strategy to Develop VFM Training**

The strategy in developing the VFM training programme will be done by:

- having discussions with the Director of Audit (see paragraph **4.1**);
- developing the training programme (see paragraph **4.2**); and
- planning and designing the training programme (see paragraph **4.3**).

#### **4.1 Discussions with Management**

I will hold discussions with the Director of Audit<sup>1</sup> together with the Auditor/Deputy Auditor General (Auditor) to confirm the commitment to VFM auditing and the need for a training vision/policy to meet this commitment. I will also outline how to implement an overall training programme through a simple task analysis, competency model and a curriculum that will improve the knowledge of the staff and enhance the credibility of the Office. The action plan in **Appendix 1** outlines the proposals, responsibilities, mechanisms and projected completion times.

The need for establishing a Management Committee<sup>2</sup> comprising the Auditor and Section/Team Leaders would be emphasized, as this Committee would provide the direction and guidance needed to determine the Office training needs. The Management Committee should meet regularly in the initial stage to determine the training needs and the most practical approach to implementing the programme; this input would be vital for the success of the training programme. The Management Committee should also be responsible for the operational activities, thereby allowing the Director of Audit to deal with policy and other related matters.

My role on this Committee will be the responsibility for the VFM audit component developed through the overall training programme. However, due to the size and the budget of the Office, I will also be expected to be involved in the other training modules, audit examinations and the operational activities of the Office. Therefore, about 25 per cent<sup>3</sup> of my time will be allocated toward the training programme.

The submissions to be made to the Director of Audit for considering the establishment of a sustainable training programme will state the benefits to be derived. These benefits will include the following:

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<sup>1</sup> The Director of Audit is on pre-retirement leave; therefore the successor would be approached.

<sup>2</sup> This Management Committee is key to the success of this initiative.

<sup>3</sup> This is based on 50% for audit work, 25% for operational activities and 25% for training.

- improving the Office's ability to conduct audits, particularly VFM audits, ensuring better accountability and governance. We can focus on areas of management practices, business risks and mitigation, controls and reporting mechanisms within the programmes/projects of the various Departments, Agencies and Statutory Bodies;
- empowering and motivating the officers;
- more objective assessing of the audited entity services and programmes through stated objectives, criteria and new VFM methodology;
- providing Parliament with better information on which to make critical decisions based on efficiency, effectiveness, economy and the environment; and
- providing the opportunity for benchmarking with other Organisation of Eastern Caribbean States (OECS) countries and sharing best practices.

## **4.2 Developing the Training Programme**

The Audit Department has no established training unit and because of its size it would be too costly to set one up. Informal training is generally left to the Team Leaders of the Sections. The majority of in-house training concentrates primarily on financial/attest auditing. There is no organized training on VFM auditing. Consequently, there is a challenge to setting up a training vision/policy and a programme that would meet the needs of the Office.

The following measures are being proposed:

- A training vision/policy and structured programme should be set up as a priority. The Management Committee, with the Auditor as the Team Leader, will be responsible for this initiative. The assistance of the Establishment, Personnel and Training Department (EPTD), the Department responsible for the recruitment and training of all public officers, would also be solicited in developing this initiative. Resource persons in the fields of Professional Development, Accounting and Auditing would be engaged as external facilitators, since this would be a one-time event. The Canadian Competency Model (CCM) would be used as a guide in setting up a Model suited to the needs of the Office. This would be done by assessing the CCM values and their compatibility in the local setting and the necessary adjustments to be made. The selection for further overseas training will also be considered.
- Implementation of the VFM training would be achieved within three months of approval by the Director of Audit of the training vision/policy, the programme and a schedule. Prior to establishing the training vision/policy, and before planning, developing and implementing the training programme, the existing manuals and methodology would be reviewed and updated with the knowledge and experience gained during the nine-month Fellowship Program in Canada. The training will be done primarily for the officers of the Project (VFM) Section in the initial stage; the other staff will be trained at a later date. Scheduling of the training sessions will consider operational needs.

- Since my focus is on VFM audit, I would play a leading role in this component of the overall training programme. Empowerment and a new knowledge in conducting VFM audits would boost the morale of the Projects/VFM Section and ultimately the Office, since only “special audits” are currently being conducted (as stated in paragraph 3.2). I would pursue an approach of engaging resource persons, in fields such as engineering, economics, law, and the environment, as well as the past Fellows who have retired, to be facilitators in the training programme. This would improve the knowledge of officers in the various disciplines to enable them to better conduct the audits. The Canadian Competency Model would also be used to determine the level of training required and the identification of officers for further overseas training.
- The use of electronic auditing tools will be included in the training to enhance the officers’ capability to extract and analyze data in VFM audits and to conduct financial/attest audits electronically.

### 4.3 Planning and Designing the Training Programme

The planning and design of the VFM training would require the following considerations:

- the training objectives and the expectations of both Director of Audit and the participants should be clearly stated and attainable;
- the training will be formatted in topical sessions, lectures, discussions, presentations and case studies;
- the use of overhead projectors, flip charts and videos will be the medium of communication;
- the availability of resource persons;
- evaluation of the courses will done by:
  - the participants — to determine whether expectations were met; and
  - the Management Committee and the Director of Audit — to determine whether the expectations and objectives are being met.

These evaluations will assist in monitoring and reviewing the training programme.

- the preparation of an overall budget will include the cost of materials, implementation of the training and the time taken from operational activities; and
- the conduct of VFM audits after the training will be able to meet objectives and schedules.

## 5.0 Developing the Training Materials

Training materials will be based on the modules identified and prepared with the assistance of the officers of the EPTD.

### 5.1 Course Materials

The knowledge, experience and the documents obtained during the Fellowship Program in Canada would be a factor in developing the materials to be used during the VFM training.

The course topics would include the following:

- **Planning/Survey phase.** Knowledge of the entity would be vital in determining the lines of enquiry, business risks, audit criteria, objectives and scope. The One-Pass Planning (OPP), as developed by the OAG in Canada would be used.
- **Survey Report.** Examples of findings would be included.
- **Examination Plan and Audit Program.** These would detail audit methods, procedures and audit effort required to develop initial findings in the Survey Report, with reference to stated objectives and criteria.
- **Interviewing skills and techniques.** These skills are required to effectively and diplomatically obtain answers to complete the Audit Program. The best way to achieve these skills would be by role play and case studies.
- **Lectures.** The course format would be more lecturing as opposed to facilitating due to the knowledge of VFM being insufficient in the Office.
- **Evidence gathering and substantiation.**
- **Electronic auditing tools.** The use of tools, such as IDEA<sup>4</sup>, in conducting audits would not be difficult to implement as some officers have a basic knowledge of the use of this software. Although this software is primarily used in conducting financial/attest audits, it can also be used in VFM audits for data extraction and analyzing. Computer auditing is relatively new to the Office, but with the introduction of computerized accounting systems for the public accounts and in the departments recently, the Office needs to be prepared for this changing environment. The ability to audit the computer systems would also be beneficial to the Office.
- **Environmental impact.** This aspect will be included as part of the audit process. Although the Office requests Environment Impact Assessment Studies, we have not been examining the risk management assessments in these documents.

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<sup>4</sup> IDEA was introduced to the Office by a Consultant for use in Financial/Attest audits.

- **Manuals and methodology.** The updated manuals and methodology will be the key tool in the course materials.

At the end of the course, the participants will be able to

- apply the new methodology,
- gather the data required to substantiate their findings,
- analyze the data obtained,
- prepare reports, and
- make recommendations.

## **5.2 Training of Trainers**

The knowledge of the persons who attended the Course Design and Training of Trainers Course recently, organized by the INTOSAI Development Initiative (IDI) and administered by CAROSAI, would be very useful in developing the training materials and conducting the training. The experience and knowledge of the Auditor, who recently graduated from a Masters Programme in Auditing in the United Kingdom, would also be valuable in developing the training vision/policy and programme.

## **6.0 Pilot Audits**

A pilot audit would be undertaken to assess the skills obtained during the training.

### **6.1 Conducting Pilot Audits**

A VFM audit would be conducted on completion of three months of training. The audit would be on selected topics and an entity that would be identified for these pilots. It would be of significance to the stakeholders, visible and have an impact on the taxpayers.

The criteria for the selection would be based on the following:

- business risks,
- audit risks,
- relevance and significance,
- auditability,
- availability of resources,
- political sensitivity,
- complexity,

- audit team experience,
- attainable and measurable benefits,
- support of the entity's management, Government and Parliament, and
- support of the Director of Audit.

These pilots should be done during a six-month period with the different stages of an audit used in the exercise. The Planning/ Survey and Reporting stages will be the focus areas during these pilots, as they are the new and key phases in carrying out an audit. The Examination stage, although very important, would not pose any difficulty in implementing, since the Office has been doing financial/attest and "special audit" examinations using VFM methodology. However, the preparation of an Examination Plan and Audit Programme would be included. The importance of these documents would be to identify individual projects to be done in meeting the audit criteria, following the lines of enquiry and achieving the audit objectives as established in the Survey Report. The ability to select the questions to be able to conduct effective interviews and obtain the necessary information diplomatically would also be emphasized during the pilot.

## **6.2 Success of Pilot Audits**

The success of the pilot audits would be measured by the following:

- the effective application of the updated VFM Manual and methodology;
- the improvement in the conduct of VFM audits;
- the presentation of an objective report with recommendations, on time and within budget;
- the improvement of the competence of the officers; and
- the enhancement of the Office image.

The assessment of the success of these audits should be done by the Management Committee with the Director of Audit and by an external review panel, consisting of selected persons in specific disciplines.

## **7.0 Favourable Factors for the Training Programme**

The following factors will be favourable for implementation of the Training Programme.

### **7.1 Government thrust on Training**

The Government, through the Establishment, Personnel and Training Department (EPTD), has embarked on a programme of either offering on-the-job training or financial assistance to officers to pursue further education and training, whether it is available locally or externally.

## **7.2 SAI focus on VFM Audits**

The Director of Audit has made the improvement of VFM auditing a priority by re-organizing the Projects/VFM Section of the Office and has made a commitment to obtaining the training required by the officers in meeting this goal. To date, nine officers have received some form of training in the last two years in Financial Auditing in India and through CAROSAI; and in VFM auditing, in the United Kingdom<sup>5</sup> and Canada<sup>6</sup>.

## **7.3 Need for VFM Audits**

The Parliament, Government, Donor Agencies and the public have been making increasing demands for VFM/Performance audits on various projects and programmes that are being undertaken by the various departments and agencies. In order for the Office to be able to meet these demands, the need for training of officers has become a priority.

## **8.0 Constraints in Implementing the Training Programme**

The factors expected as constraints in implementing the training programme are defined below.

### **8.1 Staff Turnover**

The Director of Audit has no authority in the appointment, transfer and secondment of officers; the Public Service Commission and the Chief Personnel Officer have the authority and responsibility for such activities. This can be a potential problem for the Office because the officers who receive training can be moved to another department at any time and at short notice. The lack of financial and promotion incentives available in the Office are the contributing factors for officers accepting promotions, transfers and secondments. The evaluation of remuneration to staff, and of the nomenclature and functions of positions relative to other SAIs should be undertaken as a priority. With the new knowledge and empowerment of employees as well as ongoing support from the Director of Audit for VFM training, the evaluation of remuneration can contribute to reducing the high level of staff turnover.

### **8.2 Technical Resources**

To carry out the training programme in the Office, a training room with all the necessary facilities is needed. However, the facilities of the EPTD could be used as an alternative in view of the financial constraints stated in paragraph 8.3. This will allow for minimal distractions and interruptions from the operational activities. Equipping the Office with computers is necessary to function in the changing environment; however, this will not affect the conduct of VFM audits as the use of computers is not mandatory in such audits. There is also a need for an IT specialist (CISA<sup>7</sup> certified) to be trained or contracted to give the necessary technical support required to adapt to the changes.

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<sup>5</sup> This refers to the Auditor. See paragraph 5.2

<sup>6</sup> This refers to the author of this paper.

<sup>7</sup> Certified Information Systems Auditor

### **8.3 Financial Resources**

The lack of adequate funding will be a major factor in the development and implementation of the training programme, conduct of VFM audits and the improvement of the Office working environment. The Office will need to prepare budgets for submission to the relevant authorities. The budgets will cover such aspects as the purchase of materials and equipment (networked computers, overhead projectors, audio/visual components); operating expenses (to include travelling), office furniture and infrastructure; and remuneration for the resource persons for the training and other consultative activities of the programme and the VFM audits to be done. The budgets can be significantly reduced with the use of the resources that are currently available at the Office or other Departments.

### **8.4 Management and Advisory Committees**

As stated in paragraph 4.1, there is a need for a Management Committee as soon as possible. The setting up of such a Committee should not be difficult, but because this is a new concept, ways of sharing and delegating some of the Director of Audit's authority and responsibility will need to be discussed. The establishment of an Advisory Committee will be critical for advice on VFM audits. This Committee should consist of past Directors of Audit, and retired persons and professionals of different disciplines, both in Government and the Private Sector, who can give advice and guidelines in identifying areas to concentrate on or not to pursue in a VFM audit. The major constraint in setting up this Committee would be providing the compensation to attract the right resource persons. The people selected would be approached by requesting that their services be provided as a contribution to the country and suggesting that this contribution would be worthwhile to them in marketing themselves as consultants. This approach would contribute to reducing the budget.

### **8.5 Independence of SAI**

The *Audit Act of 1994*, relative to the independence of the Director of Audit, should be reviewed and discussed with the relevant authorities and the Office. The review should reflect the resolution at the IXth Congress of INTOSAI, namely, *The Lima Declaration of Guidelines on Auditing Precepts*, in particular, *Sections 5, 6 and 7*, which deal with the independence of SAIs, its members and officials and financial requirements. The inclusion in the *Audit Act* of the mandate to conduct environment and sustainable development audits will empower the Director of Audit to undertake such audits. The review of the *Audit Act* should address the constraints stated above in paragraphs 8.1 to 8.4.

### **9.0 Benefits of the Training Programme**

The benefits to be derived from the training programme will be the following:

- enhanced credibility of the Office;
- improvement in officers' morale and motivation in performing audits;
- improvement of the VFM and Financial/Attest Units by using modern auditing tools;

- improvement of objectivity, efficiency and effectiveness of the audits conducted;
- a consistent approach in conducting VFM audits; and
- an opportunity for benchmarking with other SAIs.

## **10.0 Conclusion**

The establishment of a training vision/policy and a VFM training programme represents a significant challenge. The Office's culture and budgeting capacity will be tested and affected. However, the benefits to be derived from such a project would surpass the difficulties to be encountered; at the end of the exercise, the Office and the officers would have improved their ability to conduct audits to ensure better accountability and governance. The Parliament and audit entities would have more confidence in the reports submitted by the Audit Department.

The setting up of Management and Advisory Committees, the review of the independence and authority of the Director of Audit and his Office, the Office operations and functions and remuneration and nomenclature of officers would assist in enhancing the working environment.

The Government of Dominica, INTOSAI, CAROSAI and the Training Department of the EPTD, would be approached to provide technical and financial assistance in achieving these goals.



**Appendix 1****ACTION PLAN FOR A VFM TRAINING VISION/POLICY AND PROGRAMME**

This is a summary of proposals and the action plan for establishing a training vision/policy and developing a VFM training programme to improve VFM audits in the SAI of the Commonwealth of Dominica. It describes the proposals, responsibilities, mechanisms and projected completion times.

Action plan for training vision/policy and VFM training

<b>Proposals</b>	<b>Responsibility</b>	<b>Mechanism</b>	<b>Projected completion time</b>
1. Establishing a Management Committee	Director of Audit with Senior Officers	Approval of the Director of Audit	September 2003
2. Review of manuals and methodology	Steven LaRocque (Fellow -2002/03)	The review and update of the manuals and methodology	October to December 2003
3. Establish a training vision/policy	Management Committee	Approval of the Director of Audit	December 2003 to February 2004
4. Planning of training	Management Committee	Assessment of training needs assisted by EPTD	February to March 2004
5. Development of training Programme	Management Committee	Developing VFM audit guidelines and curriculum	May to June 2004
6. Implementation of training programme	Management Committee and facilitators	On-the-job training, lectures and workshop sessions	July to September 2004
7. Training evaluation	Director of Audit and Management Committee	Questionnaires and feedback	October to November 2004
8. Establishing an Advisory Committee	Management Committee	Approval of the Director of Audit	December 2004
9. Pilot audit	Audit Team	Selection of an audit in line with Office focus	January to June 2005
10. Audit evaluation	Director of Audit and Management Committee	Review of pilot audit	July 2005

11. Lessons learned	Director of Audit and Management Committee	Amend methodology and training programme	August 2005
12. SAI independence	Director of Audit and Legislators	Review of the <i>Audit Act</i> regarding autonomy of the SAI	September 2003 to December 2008

**Note 1**

The **Audit Act, No. 5 of 1994, Section 6 (2) and (3)** states:

*(2) “Each report of the Director of Audit under subsection (1) shall call attention to anything that he considers to be of significance and of a nature that should be brought to the attention of the House of Assembly, including any cases in which he has observed that-*

*(c) money has been expended without due regard to economy or efficiency or for purposes other than that for which it was appropriated by the House of Assembly; or*

*(d) satisfactory procedures have not been established to measure and report on the effectiveness of programmes where such procedures could appropriately and reasonably be implemented.”*

*(3) “In subsection (2) –*

*“economy” means the acquisition at the least cost and at the appropriate time of human and material resources in appropriate quantity and quality;*

*“efficiency” means the conversion in the best ratio of resources into goods and services; and*

*“effectiveness of programmes” means the achievement to the best degree, of the objectives or intended effects of any programme, organization or activity.”*

**Note 2**

**Section 7 (1)** *“The Director of Audit may at any time submit a special report to the Minister on any matter of importance or urgency that in his opinion, should not be deferred until the presentation of his annual report.”*