Internal Control and Risk Management Framework Project

Department of Administrative Reforms and Public Grievances (DARPG)

Volume I- Introduction and summary of work undertaken for development of ICRM framework

The work undertaken under the project for the development of the Internal Control and Risk Management Framework and the final output has been summarised into following two Volumes. The detailed reports under each phase of execution are available separately.

Volume I: Volume I is a summary of the following documents prepared under the project

Volume II: Volume II consists of Internal Control and Risk Management Framework and a detailed operational manual with a step by step procedure to be followed for implementation of the framework. It also includes the updated templates for two pilot schemes as illustrative examples for reference.

Inception report detailing clearly the methodology to be followed

Introduction

The Internal Control and Risk Management Framework Project (ICRMP) is a pioneer project drawn up by the Department of Administrative Reforms and Public Grievances (DARPG) with the purpose of developing a suitable internal control and risk management framework to be used at the time of conceptualisation and implementation of a scheme. The Project endeavors to develop ICRM framework in the context of Government sector, incorporating the leading practices of various ICRM standards (national and international) prevalent both in private and public sector. In order to achieve successful implementation of the framework developed, the project encapsulated testing of the framework against two schemes identified by DARPG.

Ernst & Young Pvt. Ltd. was selected as a consultant to the Department of Administrative Reforms and Public Grievances for articulating an internal control and risk management framework which can be implemented across all the schemes conceptualised and implemented by various Government Ministries.
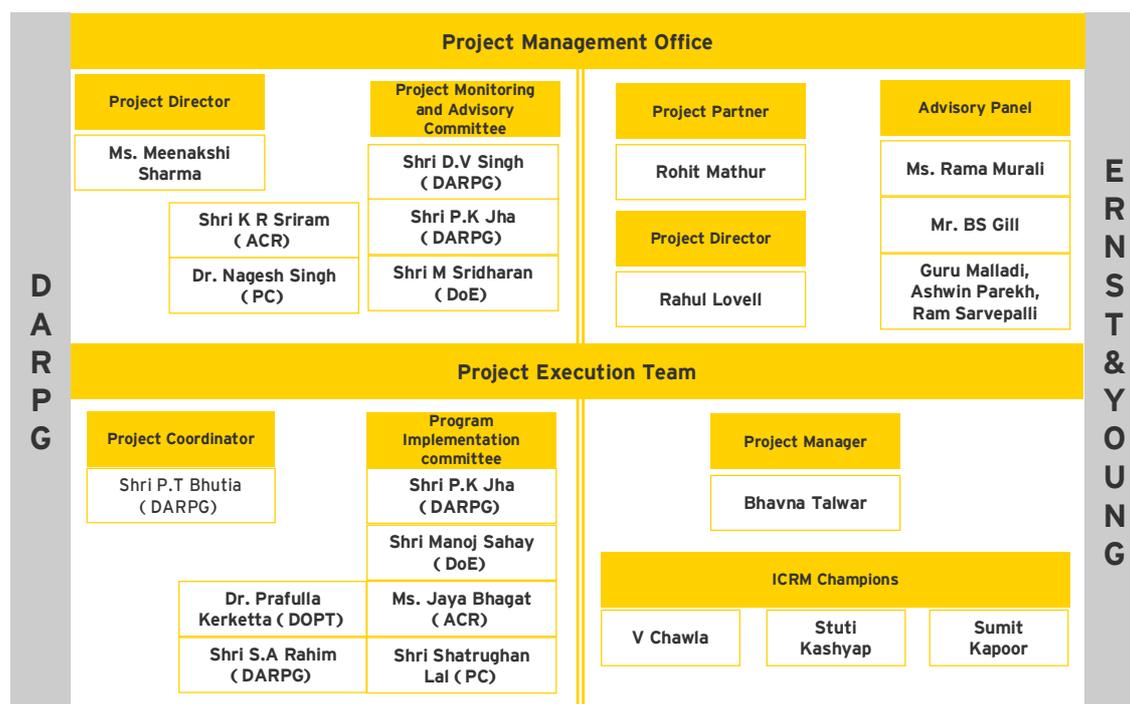
Project Objective

The objective of the project was to incorporate risk management and internal control procedures in the process of conceptualisation and implementation of government schemes in order to remove and effectively manage the bottlenecks/issues faced by relevant ministries and agencies in achieving the goals/purposes for which the schemes are formulated.

Project Stakeholders

Though the ICRMP was steered by DARPG, it involved active participation and support of key personnel from Comptroller and Auditor General (CAG), Ministry of Finance (MoF) and Planning Commission. The structure, roles and responsibilities of the various stakeholders as envisaged is detailed below:

- A Project Monitoring and Advisory Committee known as PMO was constituted with representative members from CAG, MoF, and Planning Commission. Being a part of the PMO, the personnel from these Departments/Ministries were responsible for the overall coordination of the project, for final review and approval of the reports/ deliverables under each stage, to resolve any open issues/conflicts arising during the execution and to monitor and ensure that the project progresses and delivers to achieve the set target/objective.
- Programme Implementation Committee was constituted to facilitate the overall coordination of the project.

The structure of the PMO and the Project Execution Team comprised of following personnel:

DARPG	Project Management Office				ERNST&YOUNG
	Project Director	**Project Monitoring and Advisory Committee**	**Project Partner**	**Advisory Panel**	
	Ms. Meenakshi Sharma	Shri D.V Singh (DARPG)	Rohit Mathur	Ms. Rama Murali	
	Shri K R Sriram (ACR)	Shri P.K Jha (DARPG)	**Project Director**	Mr. BS Gill	
	Dr. Nagesh Singh (PC)	Shri M Sridharan (DoE)	Rahul Lovell	Guru Malladi, Ashwin Parekh, Ram Sarvepalli	
	Project Execution Team				
	Project Coordinator	**Program Implementation committee**	**Project Manager**		
	Shri P.T Bhutia (DARPG)	Shri P.K Jha (DARPG)	Bhavna Talwar		
		Shri Manoj Sahay (DoE)	**ICRM Champions**		
	Dr. Prafulla Kerketta (DOPT)	Ms. Jaya Bhagat (ACR)	V Chawla	Stuti Kashyap	Sumit Kapoor
	Shri S.A Rahim (DARPG)	Shri Shatrughan Lal (PC)			

Scope of work

The project was divided into 7 phases namely:

- Phase 1 : Project inception and monitoring
- Phase 2 : Study of Internal Controls and Risk Management systems
- Phase 3 : Preparation of draft ICRM framework for a scheme
- Phase 4 : Pilot testing and finalization of the ICRM framework
- Phase 5 : Roadmap for operationalisation
- Phase 6 : Training and orientation
- Phase 7 : Project closure

The work undertaken under each phase is summarised as follows:

Phase 1: The aim of this phase was to articulate the goals/objectives of the project and to agree on the methodology to be adopted for timely execution of the project.

Under project inception and monitoring phase the Project Monitoring and Advisory Committee and Programme Implementation Committee (with members from DARPG and EY) was established, the reporting protocols were set and the approach to be followed for execution of the project was discussed and agreed.

Deliverables: Inception report detailing clearly the methodology to be followed; Reporting and escalation responsibility matrix; Project status update template.

Phase 2: The aim of this phase was to study globally accepted standards and proven methodologies for ICRM in government and private sector.

A detailed secondary research of the various ICRM standards and practices that are prevalent both in the public as well as the private sector was conducted. The research involved detailed study in line with the international best practices of ICRM with special focus on how these globally accepted ICRM standards have been implemented in the government and private sector.

Deliverables: Report on best practices (adopted both national and international) on the use of internal control framework that can be adopted by the Government; Report on understanding the changing needs of nature and scope of internal controls in Government.

Phase 3: The aim of this phase was to deliver a proposed ICRM framework based on the research and studies conducted.

As a part of this phase a draft ICRM framework for scheme formulation and implementation was articulated based on:

- Research and studies on ICRM standards/systems conducted in phase 2 of the project
- A detailed understanding of the existing procedures with reference to Internal Controls and Risk Management for **one pilot scheme** i.e. National Rural Employment Guarantee Scheme (NREGS) as identified and communicated by the Director, DARPG.

Deliverables: Draft internal control and risk management framework.

Phase 4: The aim of this phase was to evaluate the effectiveness and the completeness of the framework in practical scenarios and identifying opportunities to enhance and upgrade the draft ICRM framework.

In this phase, field visits were conducted to test the draft ICRM framework on two schemes as identified by DARPG. (National Rural Employment Guarantee Scheme, NREGS and the Mid Day Meal Scheme, MDMS). The proposed framework was reviewed against the objectives, risks and controls of these schemes. The objective of testing the framework was restricted to assessment of the completeness of the framework and not to evaluate risk management and internal controls systems/ procedures of the schemes.

Deliverables: A report on the pilot study of select schemes; Internal Control and Risk Management framework that can be adopted by the Government in scheme formulation and implementation.

Phase 5: The aim of this phase was to formulate a road map/work plan for operationalisation of the ICRM framework at other Government Ministries.

A manual for roll out of the ICRM framework across Ministries encapsulating the complete process and approach for implementation and other enablers was prepared.

Deliverables: A manual for deployment of the Internal Control and Risk Management framework

Phase 6: The aim of this phase was to train identified key personnel with respect to the ICRM framework to ensure that the framework is replicated and used successfully across Ministries.

A complete training tool-kit was prepared for implementation of the ICRM framework. It also contains the updated templates for two pilot schemes NREGS and MDMS as illustrative examples for roll out of the ICRM framework.

Deliverables: Training tool- kit on the Internal Control and Risk Management framework.

Phase 7:

The aim of this phase was to reflect the key learning's and the experiences during the project execution and to ensure that the objectives of the project are successfully met.

All project related documents/ deliverables were handed over by EY to DARPG. A project closure report was prepared encapsulating the experiences during project implementation and a mapping of the outcomes laid down at the beginning of the project with the actual delivery.

Deliverables: Project Closure Report with experiences during implementation;

A detailed Inception Report has been submitted separately under the project.

Report on best practices on the use of internal control framework

Before undertaking the development of the ICRM framework, there was a need to understand and identify the ICRM standards/ guidelines/ practices successfully adopted and implemented by the various Governments internationally and by different organisations in the public and private sector. Hence a comprehensive study of the existing ICRM systems in both developed and developing economies of the world and review of the national and international standards and best practices was undertaken.

The underlying objective the research work was to identify the best/ leading internal control and risk management practices, customise them to suit the needs of the Government of India and incorporate them in developing a generic framework (in line with globally recognised standards) which is comprehensive, yet simple and easy to understand and implement.

The findings and the outcomes of the study and research work conducted was compiled in the form of a report on best practices (adopted both national and international) on the use of internal control framework that can be adopted by the Government.

A summarised extract of the report on best practices on the use of internal control framework is provided below. A detailed report has been submitted separately under the project.

Introduction

The study aims to highlight some of the internationally recognised standards/guidelines, best practices that can be considered for the development of an internal control and risk management framework in the context of the Government schemes/ programmes.
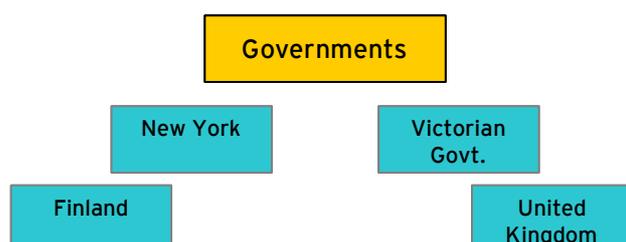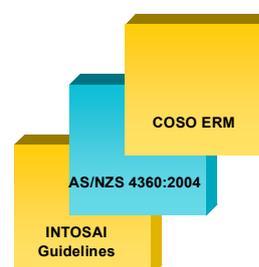
The objective of the study is not to put forward a rigid internal control and risk management framework for the Government, but, to suggest (in alignment with globally recognised standards) an outline of what a internal control and risk management framework must comprise of and recommend some best practices which may be adopted.

The study has been divided into 3 segments namely:
1. Review of national and international 'Internal Control and Risk Management' standards/guidelines and best practices
2. Review of 'Internal Control and Risk Management' standards/guidelines adopted by Government of four different countries
3. Review of risk management standards adopted in private organisations

The **first segment** of the study provides an overview of risk management and identifies the leading practices of three popular and widely accepted 'Internal Control and Risk Management' standards/guidelines namely:
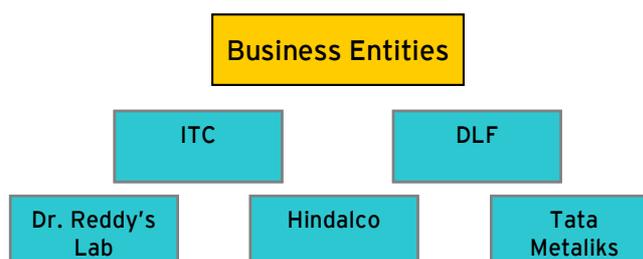- INTOSAI Guidelines for Internal Control;
- Australia/New Zealand Standards 4360:2004; and
- COSO Enterprise Risk Management Framework.

The **second segment** of the study reviews the 'Internal Control and Risk Management' framework adopted by Government of four different countries. This would enable the Government to

understand the appropriateness of these standards *vis-a- vis* their organisations.

The **third segment** of the study highlights the best practices/standards adopted by various private sector organisations to build their 'Internal Control and Risk Management' frameworks. These frameworks can be customised to develop an effective 'Internal Control Risk Management framework' for the public sector.

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Risk has traditionally been defined in terms of possibility of danger, loss, injury or other adverse consequences. According to Committee of Sponsoring Organisations of the Tread way Commission (COSO), risk may be defined as, "The possibility that an event will occur and adversely affect the achievement of objectives."

Increased complexity of the environment has made it imperative for every organisation to adopt a systematic approach to risk, which may help it to manage uncertainty, threats and maximise opportunities more effectively.

Risk permeates across all organisations both in Government as well as private sector. The role of any Government organisation does not end at utilising the resources but extends to its accounting to the public. Government institutions being large organisations, managing huge resources tend to have larger exposure to risk. The need for risk management is reflected in its commitment to ensure transparency and accountability of its operations.

The process of assessing, monitoring and responding to risks in order to reduce their impact is achieved through the implementation of a risk management framework.

***Risk management framework** is a basic conceptual structure used to address the risks faced by an organisation.*

A basic internal control risk management framework for any organisation would essentially consist of the following broad steps:
- Risk identification;
- Risk prioritisation;
- Risk mitigation;
- Implementation of mitigation plans; and
- Review and monitoring of mitigation plans.

(For a detailed study of the concept of risk management refer chapter 1 of the detailed report)

Various organisations, national/international, have conducted a detailed study of internal control and risk management and issued various accepted internal control and risk management standards/ guidelines. These standard/guidelines provide the minimum basic norms that an effective framework comprises, while allowing flexibility in their implementation. The study examines three standards namely:
- INTOSAI Guidelines for Internal Control;
- Australia/New Zealand Standards 4360:2004; and
- COSO Enterprise Risk Management Framework.

A brief of each standard and their salient features have been outlined below:

1) International Organisation of Supreme Audit Institutions (INTOSAI) Guidelines for Internal Control standards for public sector

These guidelines lay emphasis on the design, implementation and evaluation of internal controls in the public sector. Government is therefore an important addressee of the guidelines. The guidelines recommend a framework for establishing and maintaining effective internal controls without interfering or limiting the duly granted authority related to legislation, rule making, etc. and provides a basis against which internal control can be evaluated.

(For a detailed study of INTOSAI guidelines refer chapter 2.2.1 of the detailed report)

2) Australian/ New Zealand Standard (AS/NZS 4360:2004)

The Standard provides a well structured framework for managing risk and is independent of any specific industry or economic sector. It aims at achieving greater emphasis on maximisation of potential gains and minimisation of potential losses by embedding risk management practices into the organisation's culture and processes.

The Standard has increased the effectiveness of risk management frameworks by introducing the elements of:

- Communication and consultation which makes risk management more analytical as different perceptions about the risk are collated to identify critical areas for progress; and
- Establishing context which helps in the overall process of risk management

(For a detailed study of AS/NZS-4360 standard refer chapter 2.2.2 of the detailed report)

3) Committee of Sponsoring Organisations (COSO) Enterprise Risk Management (ERM) Integrated Framework

The standard defines enterprise risk management, and provides foundational definitions, concepts, objectives, categories, components, and principles of a comprehensive enterprise risk management framework. It provides direction to organisations in determining how to enhance their enterprise risk management. This standard can be used in any organisation, public or private, and can be modified according to the needs of the specific organisation.

(For a detailed study of COSO – ERM Integrated Framework refer chapter 2.2.3 of the detailed report)

The second and the third segment of the study examine the risk management framework adopted in Government set up and private organisations. A snap shot of the risk management standards as adopted by few selected organisations is depicted below:

Adoption of Standards by various organisations				
Entities	**Standards**			
	INTOSAI	**COSO**	**AS/NZS-4360**	**Combination**
Analysis of Governments				
United Kingdom Government				✔
New York Government	✔			
Victorian Government			✔	
Finland Government		✔		
Analysis of Private Companies				
ITC				✔
DLF				✔
Dr. Reddy's Laboratories				✔
Hindalco Industries Limited				✔
Tata Metaliks			✔	

Note: These results are based on broad level examination conducted for the purpose of the study.

Compilation of Best Practices across various Governments

Organisation	**Summary of Best Practices**
United Kingdom Government	• Using Future Analysis and Horizon Scanning techniques to predict potential threats, opportunities and likely future developments • Two -way analysis and common risk register methods adopted to discus risks and mitigation strategies
New York Government	• Clear definition of elements of each feature of its framework • Provide internal control education and training • Periodically evaluate the need for an internal audit function
Victorian Government	• Formalising and building upon existing processes rather than signalling a direct change in policy • Involvement of department and agency heads in risk management processes of public agencies and compliance with the AS/NZ standard
Finland Government	• Yearly assessment of the internal control system to clarify the top management responsibility for arranging a sound internal control system

Organisations following a combination of the guidelines suggested by these standards have been able to effectively manage the risks inherent in their operations and achieve their desired objectives in best possible manner.

Conclusion

The study of the standards and guidelines for internal control and risk management and examination of four Governments set ups and five esteemed private organisations, highlight the following key components that are required for establishing an effective internal control and risk management framework:

1. Setting the context

The first step is to define the context in which risk management shall operate. Developing this context helps to communicate how risk management fits into the normal activities of management. It also helps to frame further stages of development and is often the starting point for discussions around selecting or building a detailed framework that will underpin future risk management activities.

2. Risk identification

This involves identification of the risks to be managed using a well-structured systematic process, and it includes all risks whether or not they are under the control of the organisation. It aims to generate a comprehensive list of sources of risks and events that might have an impact on the achievement of each of the objectives identified in the context.

3. Risk prioritisation

Risk prioritisation refers to a process of prioritising the identified risks using qualitative and quantitative methods in order to categorise them on the basis of their severity in terms of project failure. To effectively compare identified risks, and to provide a proactive perspective, the risk prioritisation method should consider the following factors:

- Probability of the risk occurring;
- Consequence of the risk; and
- Cost and resources required to mitigate the risk.

4. Risk mitigation and implementation of mitigation plans

Risk mitigation involves developing a risk mitigation policy, plan and support arrangements. It enables implementation of risk management throughout an organisation.

The risk mitigation plan defines how risk management should to be conducted throughout the organisation. Risk mitigation plans may be separate or included in the risk management plan. The aim of the risk mitigation plan is to embed risk management in all the organisation's important practices and routine functioning so that it is relevant, effective, efficient and sustained.

Ideally the mitigation plan includes the following:

- Proposed actions;
- Resource requirements;
- Responsibilities;
- Timing;
- Performance measures; and
- Reporting and monitoring requirements.

5. Review and monitoring of mitigation plans

It is necessary to monitor the effectiveness of all steps of the risk management process. This is important for continuous improvement. Risks and the effectiveness of treatment measures need to be monitored to ensure changing circumstances do not alter priorities.

On the basis of the study of three internal control and risk management standards and frameworks adopted by different organisations (government and private), the following conclusions can be drawn:

- There is **no single risk management framework** to suit the need of a particular organisation. Every organisation implementing the risk management needs to customise the standard to operational realities to arrive at a framework that is robust, practical and easy to implement;
- The risk management framework is most effective when it is build into the organisation's infrastructure and is an **integral part of the routine operations**;
- The **components of risk management** are to be revised for different organisations and are defined by the organisational model and strategies, structure, culture, risk appetite and dedicated resources. It is not a standard "fit-all" solution;
- The risk management is **not a one-time activity**. It is a continuous activity which requires a periodic refresh due to changes in external environment. This periodic refresh may be in the form of identifying more 'Risks That Matter' or even revising the risks after predefined periodicity keeping in view the changes in environment; and
- Risk Management is a tool to identify, prioritise and mitigate the risks. Though it ensures that steps are taken to achieve the objectives but it **does not provide absolute assurance** in respect of any of the categorised objectives.

Risk management for a Government scheme/programme

Risk management can help Government departments improve their performance in a number of ways. It can lead to better service delivery, more efficient use of resources, better project management, help minimise waste, fraud and poor value for money and promote innovation. Citizens and businesses can waste time and lose out financially if public services are inadequate or inefficiently delivered. And the reputation of departments can suffer where services fail to meet the public's expectations. Assessing the risk of such circumstances arising can help departments ensure that they have adequate arrangements in place to deal with them. In recent years Governments have faced significant problems in handling risk at strategic, program and operational levels. Therefore, government needs to improve its risk handling capacity. This can be done effectively by embedding risk management (which is a crucial element of internal control) into its policies, structure and activities.

Risk management also needs to be done in the context of the Government schemes/ programmes. The Government schemes are launched with a view to achieve a certain set of objectives in more than one state. In order to ensure that the funds sanctioned for a particular scheme are used for the intended purpose, achieve value of money and are properly accounted for, an internal control and risk management framework involving setting up the objective, identifying the risks, prioritising the risks and preparation of mitigation plans for risks so identified, for each state keeping in view the environment in which each state is operating, is imperative.

Further, continuous monitoring in the form of audits (performance and social), periodic risk refresh exercises are essential for effective implementation of a scheme and for meeting the overall objectives of a scheme to:

- Strengthen financial management
- Strengthen accountability
- Prevent misuse of the public funds

Report on understanding the changing needs of nature and scope of internal control in Government sector

In order to understand the concept of internal controls in the Government set up, it was important to study the recent developments in the environment in which the Government operates, which have lead to a change in the nature and scope of internal controls.

A report encapsulating the developments/changes which emphasise the need of an internal control system for public sector was prepared.

A summarised extract of the report on understanding the changing needs of nature and scope of internal control in Government sector is provided below. A detailed report has been submitted separately under the project.

Introduction

Internal control systems are not new to the Government; there are checks and balances already in place which have been part of normal day to day working of the Government ministries and departments. Further, several mechanisms for evaluating the operational effectiveness of internal controls already exist (audits conducted by the Office of Comptroller and Auditor General of India, CAG) and are also being implemented by the Government (social audits, performance audits, etc.). However, due to recent changes brought about by increased usage of technology, globalization, involvement of private sector in public administration and public demand for greater accountability and transparency in Government operations, there is a need to review the existing control mechanisms in the light of such developments and introduce a more effective internal controls framework to meet the challenges of changing times.

Government departments are responsible for a range of diverse services for citizens such as the payment of social benefits, support for business, the provision of health care and education, regulating industry and protecting the environment. All involve some degree of risk. The risks that Government plans, programmes or projects may fail; that services may not be delivered on time or to a satisfactory standard; that access is denied to some citizens intended to benefit from a Government programme; the risk of financial loss, fraud, waste or inefficiency or the risk that opportunities to deliver services may be missed, exists in all Government endeavours. Establishing effective internal controls involves an assessment of risks both from external and internal sources; therefore *Risk Management* is one of the *essential elements of a good internal control system*. Establishing effective internal control involves an assessment of the risks that Government bodies face. Hence, departments under the Government have to bring themselves up to the task of formalising their risk assessment and control processes in the interest of better and improved governance.

The objectives of this document are:
- To understand the concept of internal control in the context of public sector;
- To highlight the need for a structure of internal controls (encapsulating the element of risk management)in Government; and
- To understand how the scope of internal controls has changed with recent developments/changes in the environment in which the Government operates.

The understanding of this need is important for the governing bodies in order to meet their key objectives, achieve the expected outcomes from the initiatives undertaken and consequently ensuring better governance and service delivery for the citizens.

Need and changing scope of internal controls in Government sector

Internal control should not be looked upon as separate, specialised systems within a Government organisation. Rather, internal control should be recognised as an integral part of each system that government uses to guide its operations. There is a need to ensure that internal controls and risk management becomes a standard feature of the way the Government departments carry out their activities. Improved internal control and risk management in Government is necessary not only to improve policy/programme formulation and implementation but also to support innovation and change needed to deliver better public services. Without systematic internal controls mechanism, actual outcome of policies are likely to differ widely from the intended outcomes.

An effective system of internal controls serves as means to obtain reasonable assurance that the programmes/ steps and actions undertaken by the Government meet their established goals and objectives.

In India, the increased focus and need for internal controls in the Government sector is due to the changes and developments taking place in the environment in which the Indian Government operates. Some of the changes/developments which emphasise the changing need of an internal control system for public sector are as follows**:**

1. Public Private Partnerships (PPPs)
There is a large gap in the demand and supply of essential social and economic infrastructure and services. The Government is, therefore, actively promoting Public Private Partnerships(PPPs) in the key infrastructure sectors of transport, power, urban infrastructure, tourism and railways for producing accelerated infrastructure investments and minimising the infrastructure deficits in the country.

Increased role of private sector as a partner in developmental and similar programmes of Government raises a question on the productive use of Government funds placed at the disposal of private organisations. It is, therefore, essential to have focus on systematic internal controls framework in the formulation and execution of these PPPs in order to provide a fair, comprehensive, objective and well balanced assessment of such contracts/partnerships to the Government and public.

2. Devolution of Government funds and need for strengthening Financial Management Systems
With the fast paced developments in Government expenditure both in terms of its volume, mix and variety, many flagship programmes (such as Jawaharlal Nehru National Urban Renewal Mission, National Rural Employment Guarantee Scheme, Drinking, Water Mission,etc.) have been undertaken by the Government which consume a substantial portion of development funds. These programmes have the capacity to make a critical impact on rural development, agricultural output, drinking water availability,irrigation,poverty eradication, employment creation, universalising primary and elementary education and improving infrastructure.

Advocating the grassroots level participation and implementation as the essence of good governance, various local bodies are being increasingly invested with responsibility of implementation of many schemes and programmes. Governmental funds (both Union and State) are being increasingly devolved through urban and rural local bodies/delivery channels.

In fact, in certain cases by Special Purpose Vehicles and Non-Governmental Organisations (NGOs) to ensure proper execution of programmes and delivery of service to the people.

Where the Government is allocating funds and responsibilities for overseeing and implementing programmes to different bodies, it faces a challenge to track/monitor the expenditure and performance of the delivery channels at each level of implementation of schemes/programmes to ensure economical, efficient and effective administration of the funds. Corrective steps to remedy the weak internal controls and lack of capacity to properly utilise the funds need to be taken.

Increased devolution of funds requires sound financial administration in regulating the expenditure within the grants. Due to deficiences in the current financial management system there are instances of substantial excess expenditure or savings in relation to grants. The main deficiencies are improper budget procedures and controls and incorrect/unrealistic original estimates, inefficient management information systems, misclassification of accounts and lack of proper reconciliation and non-compliance of financial rules. Any strategy for improving the financial management performance must include setting up of a framework of internal controls over the flow of funds and mechanism for tracking and monitoring of funds to the end use.

3. Demand for greater accountability and transparency in Government operations

Accountability and transparency, the two cardinal principals of good governance in a democratic set up, depend for their observance on how well the internal controls procedures and systems are embedded in the operations and functioning of the governing agencies.

In a system of representative democracy, institutions, officials and agencies of Government assist to serve the interests of the public. With the increased public awareness propagated by media, the citizens today better understand the structure of the Constitutional system and are increasingly aware of the rights available to them. Further the introduction of Right to Information Act, 2005 has encouraged people to be enthusiastic participants in public administration and has subjected the actions of the Government to regular, independent investigation and review thus making the complete process more democratic.

In case of public sector, accountability is of prime importance. Officials and employees who manage programmes must be accountable to the public. They should not only to account for funds spent on a programme, but also to demonstrate the value of the program and its accomplishments. Hence, the need to have a well defined system of internal controls to act as a validation agency to ensure objectivity and provide comfort not only to the governing bodies but also to the common man on the streets that monies contributed by him have been most efficiently expended.

4. E-Governance and increased usage of Technology

With the advent of E-Governance the Government has taken steps to use Information Communication and Technology (ICT) as a tool to modernise their workings and as a result, it has impacted both the service provider i.e. Government and the recipient (the citizen).

The result of E-Governance initiatives has been that internal processes have been re-engineered, delivery mechanisms have been streamlined and standardised, new approaches have been adopted for data privacy and security and unmanned delivery points have been

accepted as normal. The potential risks of security breaches/breakdowns, computer services disruption, data corruption and more importantly leakage of confidential information, grow fast with the increased usage of technology as part of E- Governance initiatives.

The primary concern of an IT system is to ensure that it produces accurate, reliable, relevant and timely output. Information security (protection of sensitive information from unauthorised disclosure or interception) is another challenge to be countered by a good IT system.

In the light of such changes/developments taking place in the technological space and in order to mitigate the potential IT risks, there is an incessant need for an effective internal control system encapsulating the necessary technology enabled controls to ensure effective public administration through E- Governance.

5. Changing nature of risks

There is a well known need for sound controls to minimise financial risks, impropriety and malpractice, to safeguard public assets and to manage health, safety and environmental risks. With the involvement of private sector and other local bodies, usage of technology in public administration and steps undertaken for establishing accountability and transparency in the business operation, there has been a change in the nature of risks that the Government faces. Hence the need for a more effective and robust internal control system to assess and manage the risks which could prevent key objectives and programme outcomes from being achieved and consequently having an adverse effect on service delivery for citizens.

Some of the different types of risks (arising due to internal and external factors) which Government faces today and which emphasise the need for an internal control system in Government are as follows:

- **Illustrative risks arising due to internal factors**
  - **Failure** of contractors, partners or other Government agencies to provide services as required;
  - **Continuing debate and growing experience** over transfer of risk (in capital projects and service delivery) to the private sector;
  - **Project delays, cost overruns**, and **inadequate quality standards**;
  - **Delayed or failed** introduction of new technology;
  - **Loss or misappropriation** of funds through fraud or impropriety;
  - **Inadequate skills or resources** to deliver services as required;
  - **Disruption** from industrial action, protest, or failure of transport or IT infrastructure;
  - **Inconsistent** programme objectives resulting in unwanted outcomes;
  - **Inadequate contingency plans** to maintain continuity of service delivery;
  - **Failure to evaluate pilot projects** properly before a new service is introduced may result in problems when the service becomes fully operational;
  - **Failure to innovate** leading to sub-standard services compared with other public and private sector providers;

- **Illustrative risks arising due to external factors**
  - **Economic changes** – such as low economic growth, reduced tax revenue and opportunities to provide wide range of services or limit the availability or quality of existing services;

- **Technical risk** to keep pace with technical developments, or investment in inappropriate or mismatched technology;
- **Environmental damage** caused by failure regulations of Government inspection regime;
- **Direct threats** – from the events of September 11, 2001, to the threat of chemical and biological attack, or catastrophes;

6. Increased role of regulatory bodies in public administration

Economic liberalisation in its wake has shifted the role of Government from being a monopolistic player in certain sectors to that of a catalyst and monitoring agent. The latter function is being carried out through regulators in various sectors of the economy such as Telecom Regulatory Authority of India (TRAI), Insurance Regulatory and Development Authority (IRDA),etc. The number of regulators is growing steadily and their functions are becoming more complex. The growth of statutory regulatory bodies is a new paradigm shift in public administration in India and therefore an emerging area for establishing monitoring mechanisms and internal controls.

7. Challenges relating to the Government Accounting Reforms

The significant changes in public sector accounting and financial reporting systems around the world and their increasing convergence to an accrual basis for accounting over the last two decades have underlined the need for a review of existing Government accounting practices in India as well. The biggest challenge to operationalise the new system is the unfounded fear that applicability of better and comprehensive financial reporting standards may make the administrative machinery more vulnerable and open to misappropriation, frauds,errors,etc. Hence, the framework for operationalising the accounting reforms needs to encapsulate a system of internal controls required to plug in the inherent gaps/ weaknesses of the new accounting system/reforms.

8. Initiatives undertaken by other countries

On account of globalisation and increased trade relations with different countries and economies of the world, it is imperative for the India to follow the steps and initiatives taken by the Governments of other countries, towards building governance models based on system of internal controls and risk management. The incorporation of internal controls and risk management system/framework in the Government operations brings about greater efficiencies, provide accountability for its activities and helps achieve effective governance.

Conclusion

The world is becoming a dynamic place to live in. Changes in technology, the pressures of globalisation and de-regulation in economic and social life are driving continuous changes in business methods, personal lives of people and equally importantly the business of the Governments. The rise of media power and instant availability of information to the citizens are creating a shift in the power relationship between the Governments and their citizens. People's expectations are rising day by day and the Governments' existing systems of working are not sufficiently equipped to meet those aspirations. Some Governments around the world have taken the lead in establishing governance frameworks incorporating internal controls and robust monitoring mechanisms to deliver quality services to the people in the manner desired by them.

Unlike most countries in the world, India is yet to formally embrace a modern and reasonable objective framework of internal controls and risk management with attendant assertions in Government ministries/departments. Underlying the above enumerated developments/ changes a comprehensive framework for establishing and maintaining internal control needs to be developed to improve the effectiveness of Government operations, reliability of financial reporting and compliance with applicable rules and regulations. **The way forward** would be:

- To sensitise the ministries/departments on the need for a system of internal controls and risk management to be embedded in the normal day to day working of the governing bodies to bridge the gap between the rhetoric of good governance and actual practices thereof;
- To build an internal control and risk management framework on the basis of the internationally recognised standards/guidelines, best practices that can be used as a benchmark for the development of a risk management/internal control framework in the context of the Government-run organisations in various sectors and activities; and
- To initiate steps for development of skills for its effective implementation.

Report on the pilot study of select schemes

Based on the studies conducted and discussions held with the various Government personnel, a draft ICRM framework was developed in order to remove and effectively manage the bottlenecks/ issues, faced by relevant ministries and agencies in achieving the goals/ purposes of the scheme, at the planning and conceptualisation stage itself.

In order to test the practical applicability of the draft framework, field visits were conducted to validate the draft ICRM framework against the two pilot schemes NREGS and MDMS. The whole exercise proved to be very useful, as it helped in identifying the on-ground issues/ challenges which prevent the achievement of scheme objectives. The project team was able to validate the risks identified in the Risk Classification Framework

The results and the experiences of the field visits were summarised in the Report of pilot study of select schemes. A summarised extract of the report is provided below.

Introduction

Based on discussions with multiple personnel within the Project Implementation and Monitoring Committee, the following districts were visited to study the implementation of the National Rural Employment Guarantee Scheme (NREGS) and the Mid Day Meal Scheme (MDMS):

1) Dungarpur, Rajasthan
2) Rampur, Uttar Pradesh

The objective of the field visits to these districts was to study the implementation of the schemes and identify the key issues being faced by the implementation agencies (i.e. Gram Panchayats and Schools for NREGS and MDMS respectively).

Dungarpur Field Report

1. Pilot study of National Employment Guarantee Scheme (NREGS)

Key issues as highlighted by the various implementing agencies and as found during the field visits were as follows:

i) One of the problems faced by the Dungarpur Districts is of the lack of availability of the technical staff. Technical staff is required for two purposes mainly: Preparation of technical estimates of the works identified by the each Gram Panchayat and Monitoring of the on-going works under NREGS. Technical staff required comprises of various categories: Civil Engineers and Data Entry Operators. Although, the Rajasthan Government has sanctioned the recruitment of the Engineers/ Technical personnel with any background (Mechanical, Electrical and B.Sc Maths etc.) but the monitoring of the works taken up and assets created under NREGS is not of the quality generally expected from a technical staff. Also, there are lack of capacity building activities such as training programmes so as to equip the staff with adequate technical knowledge; *(Associated risk from framework: Capacity Building)*

ii) Inspection at the grass root level is mainly the responsibility of the Gram Panchayat (Sarpanch and Panchayat Secretary) which is further delegated to the **"Mates"** who are the residents of the same Gram Panchayat registered under the NREGS. These are generally trained at the Gram Panchayat level through the special training programmes. Mates have been made responsible for the regular measurement and inspection of the work. But Mates are often found to be biased or under the undue pressure of the village

people which affects the independence function of monitoring at the grass root level; *(Associated risk from framework: Quality)*

iii) Lack of adequate number of Banks/ Post Offices makes it difficult for the workers to get timely payments for the works done by them. Usually, workers in remote areas have to travel 4-5 kms to get their wage payments. Further, lack of adequate staff at the bank and post offices delays the wage payments from 15 days (as specified in the NREG Act) to 1-1.5 months. And on the delayed payment of wages, workers are not getting compensation as specified in the NREG Act. Also, banks get no commission/ incentives on the payments under NREGA in which they find difficult to manage the NREGS payments; *(Associated risk from framework: Infrastructure)*

iv) The minimum wage payment under NREGS as prescribed by the Rajasthan Government is Rs. 100 per day. But the actual average wage payment is found to be Rs. 78-85 per day. The reason for this low wage payment is low per day work done by the workers as per the **"Task-Basis"** of the Rajasthan Government; *(Associated risk from framework: Compliance with scheme guidelines)*

v) Due to the non-availability of the trained staff, workers get their works measured in a group of five. This makes the Junior Engineer to sanction the payment of wages according to the work of all the five members of a group. This results in average release of wage-payment for all the five members including those members who have performed less in the specified work; *(Associated risk from framework: Compliance with scheme guidelines)*

vi) Assets created under NREGS are mostly of the nature of earthworks. This adversely impacts the objective creation of durable assets. The assets mostly created under NREGS in Dungarpur district are-Checkdams (for water conservation), gravel roads (Kuccha road) and plantation works. These checkdams and gravel roads involve very less material component and a very high labour component. Their existence does not last for a longer period of time. Earlier, Rajasthan Government allowed construction of cemented roads as a part of the NREGS projects but later on it was removed from the list of the permissible works. The reason behind this was that the cement roads involved a huge material component which according to NREGA cannot be more than 40%. Also, the plantation works does not have the survival rate beyond 25-30%. Hence, the assets created are of non-durable nature which can subsequently be washed out; *(Associated risk from framework: Asset sustainability)*

vii) The works mentioned under the category (iv) of the permissible works under NREGA (provision of irrigation facility, plantation, horticulture, land development to land owned by households belonging to the SC/ST) found to be an issue of dispute in villages. Since this particular component indicates the personal benefit of the land owner, the other households usually complain that the similar project have not been undertaken by the Gram Panchayat on their lands; *(Associated risk from framework: Scheme delivery mechanism)*

viii) During the visit, at both the Gram Panchayat- Bhasor and Obri, grievance register was found to be empty. According to the Panchayat Secretaries, the complaints were taken care of by Sarpanch and Secretary personally, but no written record of the complaints was found. This highlights the problem of an ineffective grievance redressal system; *(Associated risk from framework: Implementing agency effectiveness)*

ix) Provision of work site facilities has created and additional burden on the workers. As per the norms, a work site must have a shed which as per the findings is interpreted as a special tent. Installation, dismantling and storage of the tent create an additional burden on the mates and other workers. Also, the provision of crèche on the work site

has found to be ineffective as the workers don't carry their kids to the work site; *(Proposed risk to be added to the framework: Community involvement)*

x) Further, there is no maximum age limit been prescribed at which a worker can work under NREGS. This results in payment of wages to the very old people who work significantly less than the other workers; *(Associated risk from framework: Beneficiary assessment and identification)*

xi) The Rajasthan Government from time to time issues notification as regards the priority for the inclusion of works at the Gram Panchayat level. On the contrary, the priority assigned by the Gram Sabha is found to be different. But the sanctions are made only according to the Rajasthan Government priority. *(Associated risk from framework: Scheme Management)*

xii) As per the discussions held with different implementation agencies at the District, Block and Gram Panchayat level, the suggestions were given as regards the extension of 100 days employment to 150 days of employment. The reason for this suggestion is that the Dungarpur region is a tribal drought affected region where the agriculture lasts only for 4 months. Rest of the year, households generally have limited or no employment opportunities. *(Associated risk from framework: Scheme output and outcomes)*

2. Pilot study of Midday Meal Scheme (MDMS)

Key issues as highlighted by the various implementing agencies and as found during the field visits were as follows:

i) The funding as per the norms of Rs. 2.08 (for classes I-V) and Rs. 2.60 (for classes VI-VIII) are found to be inadequate especially in the schools where the task of preparation of the meals has been made the responsibility of the teachers. In addition to it, the Rajasthan Government requires fruits to be given to each child under the scheme every Wednesday which seems to be nearly impossible in such a small amount. Since, the Naandi foundation has not been able to provide fruits within the funding limits, Rs. 0.10 is deducted for per child day from the total funds provided to them per child ; *(Associated risk from framework: Budgeting & Forecasting)*

ii) Facility of drinking water is another issue which is prominent at most of the places in the Dungarpur District. Since, the district is a drought affected area, hand pumps get dry in the summer season. Cooks/ teachers have to travel to distant places to make available the necessary facility; *(Associated risk from framework: Infrastructure)*

iii) Cooks are entitled to get paid at the rate of Rs.0.30 paise per child day. In the schools where there are less number of students say for example 50 or less, there the maximum per day cook's wage amounts to Rs.15 per day which is quite low. The cooks don't turn up to the work due to the fact that NREGS provides them within an opportunity to earn Rs.100 per day which is quite high as compared to the above mentioned rate; *(Proposed risk to be included in the framework: Counter productive schemes)*

iv) The Gram Panchayat has been delegated with the responsibility of the implementation of the MDMS. During the field visit, it has been found that no or negligible interest has been taken by the Panchayats. As a result, the teachers are entrusted with an additional responsibility of making available the necessary facilities for the implementation of the scheme. This significantly affects the their teaching time; *(Associated risk from framework: Implementing agency effectiveness)*

v) The transporters that have been entrusted with the responsibility of providing the grains to the schools sometimes provide the grains for three months as against the norms of providing the grains for two months. This leads to problems in storage of the grains so

received. It was found based on the discussions with various officials that some schools does not get adequate food grains due to the fact that transporters sometimes avoid going to the interiors of the districts. Thus, the demand is not matched by the transporters supplies; *(Associated risk from framework: Infrastructure)*

vi) Earlier, the micro-nutrients tablets were being provided to the children on a regular basis and without the periodic health check ups. Some tribal parents have even opposed the giving of tablets; *(Proposed risk to the framework: Community Involvement)*

vii) Periodic and effective health check ups are not prominent as the health check ups are only conducted twice a year and that too by ANM which does not has the basic facilities to carry the checkups effectively; *(Associated risk from framework: Compliance with scheme guidelines)*

viii) The kitchen maintained by the schools have an adverse effect on the health of the cooking staff since there is an inadequate space for the disposal of smoke; *(Associated risk from framework: Health & Safety/ Environment)*

ix) In almost all of the schools, fire wood is used instead of LPG gas or smokeless chulhas. The reason is that there is a shortage of LPG gas in Dungarpur District. This also has an adverse effect on the health of the cooks; *(Associated risk from framework: Health & Safety/ Environment)*

x) The involvement of the parents in the Midday Meal Scheme has found to be quite less due to the lack of awareness among rural people. Also, the children take care of their homes and pets when their parents go out for work under NREGS. In a way, NREGS has a counter effect on the implementation of Midday Meal Scheme'; *(Associated risk from framework: Information, Education & Communication)*

xi) Where the function of cooking has been assigned to Naandi foundation, the schools have reported the cases of children not eating food. The reason is that food cooked by Naandi doesn't match the local taste of the tribal children; *(Proposed risk to the framework: Community involvement)*

xii) There is lack of availability of skilled data entry operators and dedicated Management Information System (MIS) Cell at District level. The Block level officer has been found to be overburdened with the responsibility of the data entry in the MDMS MIS. Since, most of the schools provides incomplete information to the Block level officer, this further enhances his job; *(Associated risk from framework: Capacity Building)*

xiii) The system of monitoring is being defeated by the lack of infrastructural facilities available with the Block Level Officers. No local conveyance or facilities/ allowance are provided to them for the purpose monitoring the implementation of MDMS effectively. *(Associated risk from framework: Infrastructure)*

Rampur Field Report

1. **Pilot study of National Employment Guarantee Scheme (NREGS)**

Key issues as highlighted by the various implementing agencies and as found during the field visits are as follows:

i) One of the problems faced by the Rampur district is of the lack of availability of the technical staff. Technical staff is required for two purposes mainly: Preparation of technical estimates of the works identified by the each Gram Panchayat and Monitoring of the on-going works under NREGS. Technical staff required comprises of various categories: Civil Engineers and Data Entry Operators; *(Associated risk from framework: Capacity Building)*

ii) Inspection at the grass root level is mainly the responsibility of the Gram Panchayat (Sarpanch and Panchayat Secretary) which is further delegated to the **"Mates"** who are the residents of the same Gram Panchayat registered under the NREGS. On the field visits, it was found that there is no system of Mates that exists on ground and the tasks which are the responsibilities of Mates are being carried out either Gram Rozgar Sahayak or Panchayat Secretary; *(Associated risk from framework: Quality)*

iii) Lack of adequate number staff in banks makes it difficult for the workers to get timely payments for the works done by them. As found on the discussion with workers and other implementing personnel, there is usually one officer at each bank who is supported by one clerk. In absence of adequate number of staff, officer at the bank does not support the workers in getting their wage payments. Further, due to lack of availability of the technical staff, the banks take ordinarily an average time of about 8-12 days in the transfer and clearance of funds at every level ranging from district to village. Some cases of the misbehaviour by the bank officer have been found to be reported; *(Associated risk from framework: Infrastructure)*

iv) During the field visits, it was found that most of the works have been delayed or not taken up due to the paucity of funds at the district and block level. There also has been delay in the wage payment due to this factor; *(Associated risk from framework: Funding Pattern)*

v) Two of the work sites visited did not have the work site board displaying the important details about the undergoing/ completed under NREGS. Also, none of the sites displayed the "Schedule of Rates" which as per the guidelines are essentially to be displayed at every NREGS work site to ensure public transparency; *(Associated risk from framework: Public transparency/ compliance with scheme guidelines)*

vi) As per the guidelines, the Gram Rozgar Sewak needs to be appointed for taking care of the tasks under NREGS. These are to be compensated for the work done by them out of the **"Contingency Funds"** which accounts for 2% of the total assistance under NREGS. Due to the small percentage allocated for the payment, on an average the Gram Rozgar Sewak is compensated around Rs.2000 per month which according to the local rates is quite low. Also, the prevalent wage rates particularly in the Rampur district ranges from Rs.150-200 per day which is higher than the State norms of Rs.100 per day. This makes the workers uninterested to work for NREGS; *(Associated risk from framework: Budgeting & Forecasting/ Scheme localisation)*

vii) As per the guidelines of Uttar Pradesh Government for NREGS, there is a ceiling on the percentage of the inclusion of construction of village roads in the total works. The current limit is 20% and is too low to meet the expectation of the village people as they always prioritise the construction of gravel roads in their suggestive works. So, as a result the construction works are deferred for the next period. *(Associated risk from framework: Scheme localisation)*

2. Pilot Study of Midday Meal Scheme (MDMS)

Key issues as highlighted by the various implementing agencies and as found during the field visits are as follows:

i) The teachers are entrusted with an additional responsibility of making available the necessary facilities for the implementation of the scheme. This significantly affects their teaching time. Also, lack of availability of teachers makes the task of providing midday meal more difficult; and *(Associated risk from framework: Infrastructure)*

ii) During the field visit, it was found that there is a major threat of theft of food grains and other kitchen equipment. Due to this, the Panchayat Pradhan stores the food grains and other essential condiments in his/ her house; *(Associated risk from framework: Inventory Management)*

Proposed approach for implementation of ICRM Framework

While defining and developing the ICRM framework for Government schemes and programmes, leading internal control and risk management standards and guidelines have been considered and studied in detail.

However, the focus has been to make this framework relevant to the functional processes and procedures followed by Government Ministries/departments and to keep it pragmatic and simple from an implementation and use perspective. Hence, the framework builds on existing processes of the Government to ensure better acceptance and sustainability rather than introducing ICRM as an isolated operation with a completely new set of requirements and mandates for Ministries.

Internal Control and Risk Management Framework- expected steps and activities

This section explains the typical activities of internal control and risk management.

Below is a diagrammatic representation of the Generic ICRM Framework:

The overview of each activity defined in the ICRM process is given below:

1. Set the context:
This step involves laying down the parameters that should be achieved to state that a scheme has been successfully implemented. Besides the objectives and associated outputs and outcomes of the scheme, these include other facets such as compliance, effective expenditure management, etc.

2. Risk Assessment:
This step involves understanding and listing the potential threats that may affect the realisation of the key success parameters, including the objectives for the scheme. Risk assessment involves identification and prioritisation of risks.

a. Risk identification

Once the objectives and assumptions of the proposed scheme have been established, potential risks that may have an adverse effect on the achievement of these objectives are identified. These risks are identified across levels of scheme formulation and implementation.

b. Risk prioritisation

Risk prioritisation is the process of identifying the key risks. Risks are determined as key depending on the significance of their impact on the realisation of the scheme objectives.

3. Risk Treatment/ Mitigation:

This involves laying down the action plans/ internal controls (including timelines and responsibilities) for addressing the key risks.

4. Risk Monitoring

Refers to the review and monitoring of the execution of the ICRM process at defined periodicities (monthly/ quarterly/ mid-term/ annual, etc.) and ensuring that the key risks are being effectively addressed by the laid down action plans.

It also focuses on identification of additional risks and concerns that may arise during the implementation of the scheme and taking the necessary actions required to address them.

5. Risk Assurance

Refers to an independent assurance on the effectiveness with which risks are addressed and internal controls are operating in a programme/ scheme. This is done through audits and special reviews carried out by statutory/ regulatory bodies or by agencies appointed by the relevant department responsible for scheme implementation.

6. Risk Re- assessment

Internal control and risk management is not a one time activity. It is a continuous process which requires a periodic refresh due to changes in external environment. This periodic refresh may be in the form of identifying more 'Risks That Matter' or even revising the risks after predefined periodicity keeping in view the changes in environment in which the government schemes/programmes are rolled out.

Internal Control and Risk Management Framework- steps and activities customised for GoI operations

The steps outlined above have been integrated with routine GoI operations/ activities. A synopsis of the flow of activities and consequent enablers used in the role out of the ICRM framework for scheme/programme is as follows:

Input	Process	Output
Enablers/Templates Generic risk library Template for Risk Assessment Note Key Risk Template	**1 Risk Assessment** ▶ Identify the applicable risks for the scheme ▶ Determine the risks that should be addressed while conceptualising the scheme	
	2 Proposed Risk Treatment Update the risks identified and the action plans in the Risk Assessment Note. Append the note with the EFC Memo for the scheme	**Outputs** Completed Risk Assessment Note Expenditure & Finance Committee (EFC) Memo
Inputs Completed Risk Assessment Note Expenditure & Finance Committee (EFC) Memo	**3 Scheme Approval** Approving authorities to provide any additional remarks on the risks identified and updated by the Department on the Risk Assessment Note	**Output** Updated Risk Assessment Note
Templates Risk Treatment Plans Template	**4 Risk Treatment & Scheme Roll out & implementation** ▶ Identify treatment plans for each risk and update Risk Treatment Plan template ▶ Incorporate risk treatment plans in scheme guidelines.	**Outputs** Updated Scheme guidelines & MIS Monthly/ Quarterly reporting formats Risk Treatment Plans with Guideline & MIS Mapping
Inputs Risk Treatment Plans Risk Assessment Note Scheme MIS	**5 Monitoring** Include monitoring measures for the risks in scheme MIS This will be reviewed in the Quarterly review meetings for the scheme	**Output** Actions required report (incl risk management)
Inputs Scheme MIS Risk Assessment Note Results of quarterly review meetings/ Actions required report	**6 Assurance** Incorporate evaluation of the key risks for the scheme in scope of the existing assurance mechanisms and procedures	**Output** Audit findings and observations
Inputs /Templates Scheme MIS Risk Assessment Note Audit findings and observations Results of quarterly review meetings/ Actions required report	**7 Annual/ Mid term review** ▶ Initiate a refresh process to validate the existing key risks ▶ Identify additional risks and control measures ▶ Frequency: annually/once in 3 years/ mid term review	**Outputs** Updated risk assessment Guideline & MIS mapping Monthly/ Quarterly reporting formats Updated Risk Monitoring and Re-assessment Template

For detailed operational manual for deployment of the

ICRM framework, refer Volume II