

Case Study: The internal control system of the City of Zurich – its introduction, development, structure and links to risk management

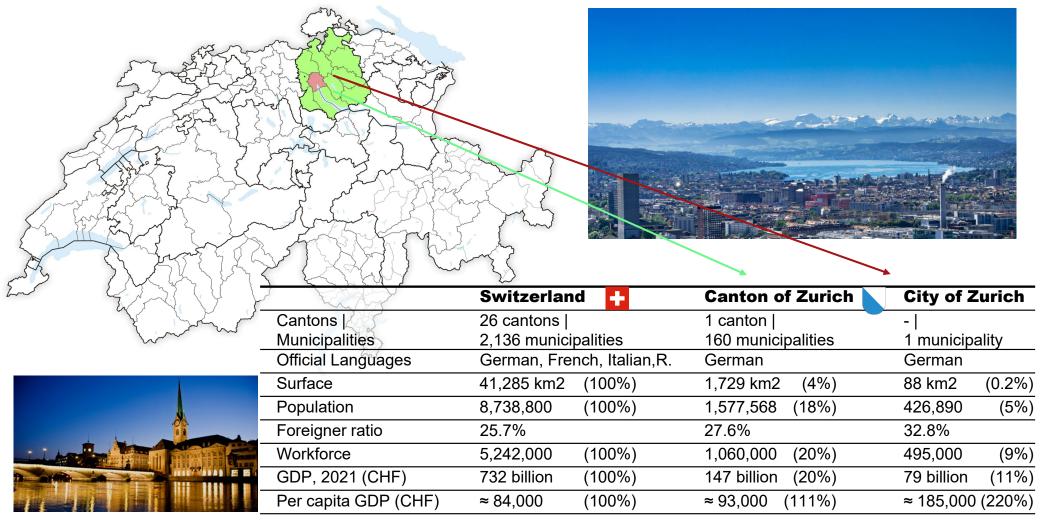
Input PEMPAL IACOP (Internal Audit Community of Practice)
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Agenda

- 1. City of Zurich
- 2. "CHARM" project for city-wide introduction of opportunity- and risk-management and of IKS
- 3. Risk management of the City of Zurich
- 4. Internal control system of the City of Zurich
- 5. Overview

1. City of Zurich

City of Zurich, Canton of Zurich, Switzerland



City of Zurich | Political system and administration



Circa 234,000 voters

Every year, a few votes (e.g., on school building construction, local law amendments. initiatives, referenda).





elect every 4 years Elections 2022 The City Council The Mayor of The City Parliament (executive authority) the City of Zurich (legislative authority) **FDP** SP 22 125 members members Mitte GLP Grüne EVP 18

Annual accounting, 2021	
(CHF million)	
Expenditure	9,294
Revenue surplus	120.1
Net investments	1,052
Equirty	1,664
Net liabilities	4,495

It issues regulations and ensures administration (22,900 FTEs) in 9 departments and circa 70 offices.

	Simplified organization chart showing a sample of offices				City Council				
	Mayor's Department	Finance	Public Safety	Health	Civil Engineering	Planning and Building	Public Utilities	Education and Sport	
	Cultural affairs	Tax Office	City Police	City Hospital	Disposal, Recycling	Public Real Estate M.	Electricity Service	School Board	Social Facilities
	Civil Registry office	Finance Admini- stration	Protection and Rescue	Homes (Nursing, for Elderly)	Office of Parks	Planning Applications Office	Public Transport Service	Sport Office	Office for Supplementar Benefits
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City of Zurich Finance Administration Case Study: The internal control system of the City of Zurich Markus Braunschweiler

22.03.2023 page 5

2. "CHARM" project for the city-wide setup of opportunity- and risk-management and of IKS

"CHARM" project

City-wide project covering all departments

_	Around 2006	Identification by City Councilor M. Vollenwyder of a potential for optimization in the area of insurance
_	Up to 2007	Elaboration of a risk and insurance outline
_	2008	Call for tenders for a solution regarding insurance, introduced Jan. 1, 2009 → Higher (risk) retention requires better risk control
_	2008	Establishment of a risk management (RM) working group, concurrent consideration of including the related topics of IKS and Accounting Manual
-	2009	Commissioning of the "CHARM" project by City Councilor M. Vollenwyder Opportunity- (chances-) & risk-management (acronym: "CHARM") and IKS
_	2011	Adoption of the Risk and Insurance Regulation and the IKS Regulation, project finalization
_	2021	Full revision of the IKS Regulation (AS 172.170)

Dealing with risks: goals and instruments

Outcome Safe, efficient and orderly fulfillment of tasks Goals **Complying** with the Ensuring and **Protecting** Reporting: reliable, optimizing law, regulations and systematic and full resources: property, ethics performance workers, know-how, coverage reputation and the environment Management IKS Processtools RM related risks **Internal Control System Risk management** → reduces process-related risks → reduces the main risks In what processes What external or internal events and may substantial errors or abuses occur? developments may endanger our organization? QMS/PMS **Quality- and process-management** main → adjusts/optimizes the processes risks Training, exchange of Instruments Outlines, Tools, On-the-spot **Statutory bases** presentations experience manuals support

3. Risk management (RM) in the City of Zurich

Risk management: what is it about?

Goals

Risk management in the City of Zurich helps to ensure the city administration's ongoing performance and operational capacity and:

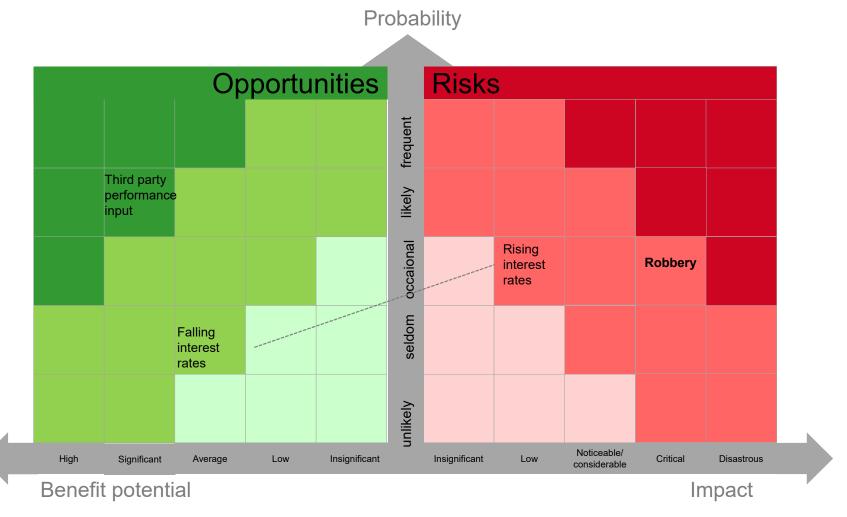
- protects human beings, the environment, property and reputation,
- ensures transparency with regard to (opportunities and) risks for the attainment of goals,
- supports management through comprehensive and updated information about risks,
- promotes, through appropriate measures, risk identification and control,
- helps to reduce risk costs,
- enhances the opportunity- and risk-awareness of all workers.

Risk management process in each service section -

usually a workshop, including management staff



Risk management | Example of an opportunity and risk map



Risk management at City level: bottom-up approach, consolidation

4. The **City Council** examines the risk map and adopts the definite version.



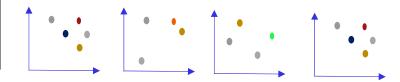
3. A group of administration executives assesses the risks from a **political standpoint** and adjusts the map.



 The technical team compiles the biggest and frequently reported risks often.
 An expert committee adjusts the map.



1. Approximately 60 **service sections** identify and assess their main risks (partly in workshops with the technical team).



4. The Internal Control System (IKS) of the City of Zurich

Regulations for RM and IKS at municipality level

Not in focus: Regulations for the federal administration No federal regulations for municipalities

- Recommendation of the Conference of Cantonal Financial Directors in the "Model finance act for cantons and municipalities" of 2008:
 - Art. 68, Risk minimization: (1) The Government Council shall take the necessary measures to protect property, ensure appropriate use of funds, prevent or detect errors or irregularities in book keeping, and ensure correct accounting and reliable reporting.
 - (2) In so doing it shall consider the risk situation and the cost-benefit ratio.
 - Art. 69, Internal Control System: (1) IKS shall include regulatory, organizational and technical measures.
 The Government Council shall issue the relevant guidelines after consultation with Financial Control.
 (2) The managements of administrative units shall be responsible for introducing, implementing and monitoring the Control System in their area of competence.

Not in focus: Regulations for the canton administration

Cantons
In this case,
Canton of
Zurich

CH

Municipal Law of the Canton of Zurich of 20.4.2015 (GG; LS 131.1)

§ 49. (1) The Municipal Board shall conduct the administration of the municipality. ...

- (2) It shall carry out monitoring and administration, and
 - (a) ensure compliance with the relevant provisions,
 - (b) provide for the appropriate use of resources,
 - (c) take measures to protect municipal property and prevent administrative offences...

Not in focus: Regulations for other cities and communities

Municipalities
In this case,
City of Zurich

Financing Regulation of the City of Zurich (FHR; AS 611.111)

Art. 9 (1) The organization units shall take measures to protect municipal property, ensure appropriate use of funds, prevent errors or irregularities in book keeping, and ensure correct accounting and reliable reporting.

(2) In so doing, they shall consider in particular - besides cantonal and local budget-act provisions - the Risk and Insurance Regulation (RVR) of the City of Zurich adopted by the City Council, and the IKS Regulation.

What is IKS and what are its aims?

According to articles 3 and 4 of the IKS Regulation (2021):

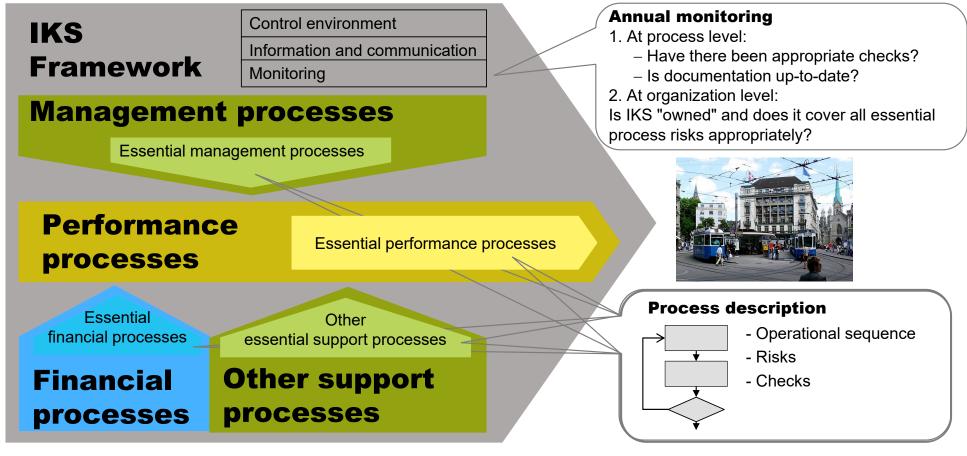
IKS is an in-house management tool. It includes all methods and measures designed to avoid, reduce and detect errors and abuse in connection with the following goals:

- Ensuring performance (of tasks)
- Complying with the law, regulations and ethics
- Protecting resources: property, workers, know-how, reputation and the environment (asset preservation)
- Reporting: reliable, systematic and full coverage

Background: the COSO cube and the Zurich-IKS cube

Goal categories Reporting Control Environment **IKS Framework** - IKS control environment Risk Assessment - Information and communication Control Activities Components - Monitoring City of Zurich Information & Communication 9 departements In essential processes Monitoring Activities - Process goals and process documentation 70 offices COSO III (2013) - Process risks Internal Control -- Process controls **Integrated Framework** - Optimization measures

Requirements specified for City IKS I



Requirements specified for City IKS II

The IKS Regulation lays down the following essential salient points:

- 1. Defining the IKS fundamentals (the IKS Framework) at office-level
- 2. Identifying essential processes
- 3. Documenting, for each essential process, the:
 - Operational sequence
 - Biggest process risks
 - Key checks (including competence, frequency and evidence)
- 4. Conducting specified checks, documenting results, correcting errors
- 5. Ensuring annual monitoring at process level
 - Is documentation up-to-date?
 - Are checks carried out effectively?
- 6. Ensuring annual monitoring at office-level
 - Is IKS in line with the essential processes?
 - Is IKS used effectively?
 - Is the "IKS Framework" up-to-date?
- 7. Undertaking optimizations where necessary

IKS roles

Various IKS tasks by level



Process

At City level

- The **City Council** adopts the IKS Regulation and every 2 years is informed about the state of IKS.
- The IKS Competence Center coordinates IKS city-wide, supports the OEs, informs the City Council.
- Financial control reviews the IKS of the OEs

At the level of each department

- The department management is informed annually about the state of IKS in the department.
- The **department's IKS contact persons** assess IKS in the in the department, inform management

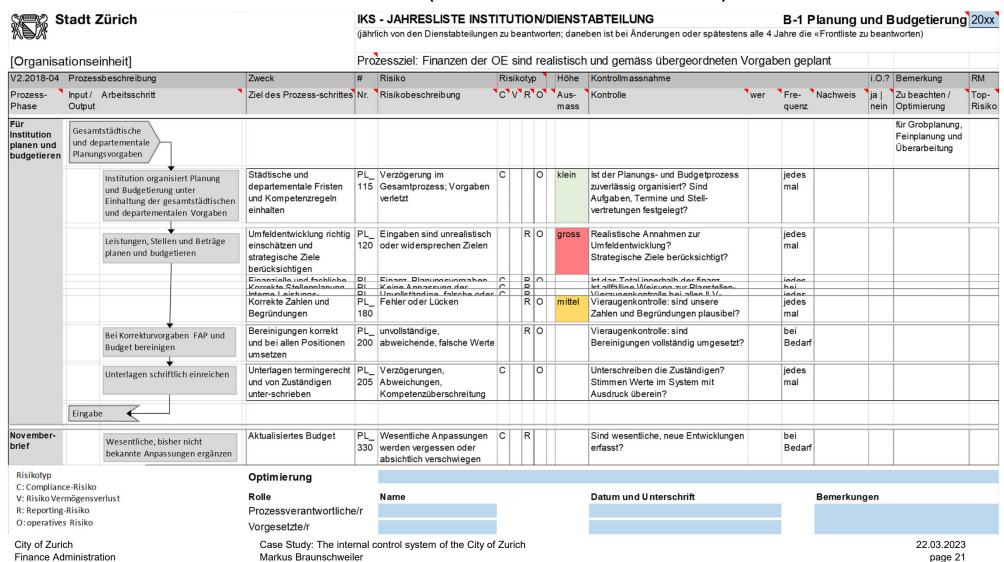
At the level of each service section

- Directors approve the IKS Framework, establish essential processes, assess IKS in the OE annually, and decide on IKS optimization measures.
- The persons in charge of IKS coordinate IKS at OE level, prepare the IKS Framework, launch and monitor process review, assess IKS at OE level, and recommend IKS optimization measures.

At the level of each process

- The **supervisors of those responsible for the process** ensure annually that the process can be assessed.
- The **persons responsible for the process** assess annually the process, including the process checks.
- The persons responsible for the checks carry them out

IKS tools: "IKS check list" (risk- and control-matrix)



Development of IKS in the City of Zurich,

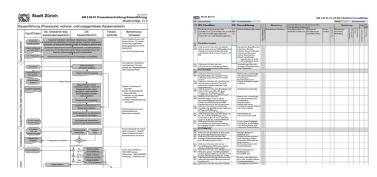
taking as an example the "cash management" process

Start (2009): Process-specific presentations

- Process description with Visio
- Risk control matrix in Excel,
 with 27 process risks and (specific) checks

Revision for HRM2 (2020): Streamlining

- Inclusion of the operational sequence
- Risk control matrix in Excel,
 with 13 major process risks and key controls





Introduction of IT Tool with workflow (as from **2023**):

- Processes, process-steps, risks and checks are documented in Tool, with links to risks, incidents, etc.
- The persons responsible for the checks receive an e-mail with a link on Tool in order to confirm the check
- The persons responsible for the process assess it on Tool, their supervisors confirm it on Tool
- The ICS managers prepare the IKS Framework and the annual report on Tool, the Director releases it.

In IKS, tightrope walk between too little and too much

Finding the golden mean

Too few checks

- Negligence
- Many errors
- Danger of abuse

Too little documentation

- Vague operational sequences
- Unclear responsibilities

Too little documentation on control findings

- No proof possible
- Uncertainly as to what was checked



Too many checks

- Costliness
- Undermined confidence
- Superficial checks

Too much documentation

- Costs
- Rapid obsolescence

Too much documentation on control findings

- Bureaucracy
- Blind targeting

Limits: No IKS can prevent all errors and abuses

- Technical disturbances
- Inadequate assessments and monitoring
- Circumvention, tortious acts

5. Overview

"Three lines of defense" in the City of Zurich

Risk management and IKS as lines of defense



2nd line of defense

- Annual monitoring of operational sequences and checks by those responsible for the processes
- Systematic regulation and monitoring of IKS by those responsible for it and by team supervisors
- As part of risk management, systematic identification and assessment of major risks, as a rule by management

3rd line of defense

- Audit of annual accounts by the district council (at canton level)
- Analysis and check-backs in connection with the budget and annual accounts by the Parliamentary Audit Commission
- Factual questions on technical matters by expert commissions
- Periodic review of IKS
- Review of IKS financial processes at period end, and generally as part of other (internal and external) audits, by Financial Control (ZFK)
- Checks by Financial Control (as part of internal and external audits) as to whether OE major risks were identified and assessed

Performance

Compliance

Property

Reporting

Goals

1st line of defense

- Daily/periodic internal control/guidance by co-workers
- Ongoing observation of the risks identified
- Appropriate response by the "risk owner"

Team

Office

City Council

Municipality Council

Canton

City of Zurich
Finance Administration

Threat

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Success factors for risk management and Internal Control System

Success factors for system setup

- 1. Support by an influential City Councilor
- Inclusion of opportunities (against the prejudice that "an organization with risks implies weak management")
- 3. Involvement of specialized staff from all departments in setting up IKS
- 4. Specification of "what" must be achieved, providing leeway as to "how", regarding organization
- 5. Stress on the benefits for the offices

Success factors for the **transition**

- a) Appropriate presentations and tools
- b) Exchange of experience with the staff responsible
- c) Committed persons in charge of IKS and RM
- d) Management recognition of the value of RM and IKS, and concomitant support and ownership.