



AUDIT AND COMPLIANCE PLAN

2025 FINANCIAL YEAR

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Introduction

The focus of the Institute of Internal Auditors (IIA) and Regulators has shifted from the traditional approach of Internal Auditing to a Risk Based approach. The risk-based internal auditing (RBIA) is a methodology that links internal auditing to an organization's overall risk management framework. RBIA allows Internal Audit Function to provide assurance to the Chairman and Director General that risk management processes are enabling the effective management of risk, in relation to the risk appetite of the organisation.

RBIA seeks at every stage to reinforce the responsibilities of Management and the Board for managing risk. If the risk management framework of an organisation is not very strong or does not exist, the organisation is not ready for RBIA. More importantly, it means that the organisation's system of internal control is weak.

Implementation of RBIA

The implementation of RBIA has three major stages as summarised below:

Stage 1: Assessing risk maturity

Obtaining an overview of the extent to which the DG and Executive Management of the forum determine, assess, manage and monitor risks. This provides an indication of the reliability of the risk register for audit planning purposes.

Stage 2: Periodic Audit Planning

Identifying the assurance and advisory assignments for a specific period, usually annually, by identifying and prioritising all those areas on which the Management requires objective assurance, including the risk management processes, the management of key risks, and the recording and reporting of risks.

Stage 3: Individual Audit Assignments

Carrying out individual risk-based assignments to provide assurance on part of the risk management framework, including on the mitigation of individual or groups of risks. The activities involved in managing risks have been recognised as playing a central and essential role in maintaining a sound system of internal control. While the responsibility for identifying

and managing risks belongs to Management, one of the key roles of Internal Audit is to provide assurance that those risks have been properly managed.

Scope of Work

The scope of work of the Audit and Compliance Department is to determine whether NGF's network of risk management, control, and governance processes are adequate and functioning in a manner that ensures:

- Risks are appropriately identified and managed.
- Financial, managerial, and operational information is accurate, reliable, and timely.
- Compliance with policies, standards, procedures and applicable laws and regulations is achieved.
- Resources are acquired economically, used effectively and adequately protected.
- Corporate goals, plans and objectives are achieved.
- Quality and continuous improvement are fostered in the departmental control processes.
- Statutory and Regulatory issues affecting the departments are recognized and addressed properly.

This Audit Plan covers the period 1 January 2025 to 31 December 2025. However, this is a flexible plan and can be adjusted based on circumstances and when the need arises.

Objectives of the Audit and Compliance Plan

- **Strengthen Internal Controls and Efficiency:** Evaluate and improve the efficiency and effectiveness of internal controls within the NGF Secretariat. Regular evaluation of control systems to enhance efficiency across all departments. To optimize resource utilization, reduce redundancy, and ensure alignment with strategic goals of the secretariat.
- **Ensure Compliance and Mitigate Risks:** Proactively identify and mitigate risks to prevent potential regulatory violations. Ensure all Secretariat functions comply with relevant laws, regulations, and internal policies.
- **Increase Accountability and Transparency:** Implement a structured audit approach that enhance accountability and fosters transparency across operations.

- **Promote Ethical and Sustainable Practices:** Foster an environment of ethics and sustainability in NGF's operations and decision-making. To promote ethical conduct through awareness programs and regular audits.
- **Safeguard Assets:** Protect the organization's assets, including financial, human, and technological resources.
- **Support Strategic Goals:** Align audit activities with the NGF Secretariat's mission and strategic objectives.

Benefits Of Risk Based Internal Audit

Contributions of Risk Based Internal Audit (RBIA) can be grouped under the following headings:

Strategic Benefits

- It facilitates prompt adaptation in changing conditions by developing a consistent and comprehensive approach for risk management.
- It provides for a better understanding and management of the risks.

Performance

- It helps in reducing negative risks, thereby increasing opportunities.
- It identifies risks and proffers appropriate management and internal controls to safeguard and promote best performance.

Aligning Resources

- It increases the ability to use resources most efficiently and creates the opportunity to eliminate unnecessary costs.
- It facilitates the alignment of resources with objectives / activities.

Managing the Unexpected

- It creates the ability to anticipate and to dynamically address unexpected demands and challenges in the face of deviations from targets.
- It eases the understanding of the risk facing the business and their actual effects.

Audit Universe

An audit universe represents the range of all audit activities and is comprised of several auditable departments/units within the organisation.

For purpose of this Audit and Compliance Plan, the Audit Universe comprises the following departments/ units: Administration/Accounts, Information and Communication Technology (ICT), Protocol Services, Policy Analysis, Federal Liaison and Technical Support, Research Consultancy and Publications and Office of the DG.

Audit and Compliance Scope by Department

This audit and compliance plan will focus all key departments within the NGF Secretariat, each with tailored audit activities to address their unique functions.

1. Administration/Accounts Unit

- **Quarterly Financial Audits:** Conduct detailed reviews of accounting records, cash handling, and financial statement preparation to ensure accuracy and regulatory compliance.
- **Payroll and Expense Audits:** Assess payroll processes, benefits, and expense reimbursements to prevent fraud, confirm accuracy, and ensure timely reporting.
- **Procurement and Asset Management Audits:** Review procurement practices to ensure transparency, vendor compliance, and value for money. Audit asset management and inventory processes for proper recording, valuation, and physical safeguarding of assets.
- **Compliance with Budgetary Policies:** Evaluate adherence to budgetary allocations and spending limits, with particular attention to budget deviations.

2. Information and Communication Technology (ICT)

- **IT Systems and Cybersecurity Audit:** Conduct regular reviews of IT infrastructure, data security, and cybersecurity protocols. This includes vulnerability assessments and incident response readiness.
- **Data Protection and Privacy Compliance:** Assess compliance with data privacy laws and internal data protection policies, ensuring that personal and sensitive information is securely stored and managed.



- **IT Asset Management and Licensing Compliance:** Review inventory of software licenses, hardware, and IT assets for alignment with regulatory requirements and cost efficiency.
- **Network Security and Access Controls:** Verify controls over network access, password policies, and user authentication mechanisms to prevent unauthorized access and potential data breaches.

3. Protocol Services

- **Vendor and Service Contract Review:** Evaluate vendor contracts and service agreements for protocol events, ensuring competitive selection processes and value-for-money service delivery.
- **Expenditure and Reimbursement Audit:** Review spending on protocol services, including travel, accommodation, and logistics expenses, to verify compliance with NGF financial policies.
- **Internal Control over Event Management:** Assess controls for managing official events, including planning, budgeting, and procurement processes, to prevent budget overrun and ensure accountability.
- **Ethical Standards in Representation:** Ensure adherence to NGF's code of conduct in all engagements, assessing protocol procedures for conflict of interest and adherence to ethical representation standards.

4. Policy Analysis

- **Policy Compliance and Review:** Ensure that NGF's internal policies align with regulatory requirements and best practices. Conduct reviews to confirm that policies are being implemented as designed.
- **Impact Evaluation of Policy Decisions:** Analyse selected policy initiatives for alignment with NGF's strategic goals and evaluate their implementation outcomes.
- **Data Quality and Analytics Audit:** Verify data sources, methodologies, and statistical models used in policy analysis for accuracy, reliability, and relevance.
- **Risk Assessment of Policy Recommendations:** Identify potential risks associated with new policy recommendations, focusing on their operational, financial, and reputational implications.



5. Federal Liaison and Technical Support

- **Inter-Agency Compliance Audit:** Evaluate compliance with federal and state regulations, ensuring that interactions with federal and state agencies meet all necessary legal and ethical requirements.
- **Grant and Funding Review:** Audit the management of grants and funding from federal sources, including adherence to fund utilization guidelines and reporting requirements.
- **Stakeholder Engagement and Communication Audit:** Ensure that communications with federal agencies and other stakeholders align with NGF's standards and avoid potential conflicts of interest.
- **Monitoring and Reporting Mechanisms:** Review internal monitoring and reporting mechanisms for federal interactions to ensure that information is accurately documented and reported.

6. Research, Consultancy, and Publications

- **Quality Assurance of Research Outputs:** Assess the methodologies, data sources, and analytical tools used in research projects to ensure high-quality, evidence-based outputs.
- **Publication Review for Regulatory Compliance:** Ensure that all publications meet legal and regulatory standards, including intellectual property rights and content integrity.
- **Consultant and Vendor Management Audit:** Review the selection, management, and performance evaluation processes of consultants to ensure compliance with procurement policies.
- **Budget Compliance for Research Projects:** Monitor adherence to budget allocations for research and publications, ensuring efficient use of funds and alignment with NGF objectives.

7. Data Unit

- **Data Collection and Management:** Assess data gathering, storage, and accessibility standards.



- **Compliance with Data Regulations:** Ensure data practices align with Nigerian data protection laws. Making sure the Nigeria Data Protection Act 2023 is been adhered to in data sourcing, processing and management.
- **Reporting Accuracy:** Confirm data used in reports is accurate and reliable.

8. Education Unit

- **Program Implementation:** Evaluate adherence to educational program objectives through the Monitoring and Evaluation Officer.
- **Budget Compliance:** Review expenses for educational programs and validate spending with the Project Accountant.
- **Stakeholder Involvement:** Verify engagement processes with state education representatives and NGOs.

9. Health Desk/Gender Desk/Helpdesk/IGR (BMGF/UNICEF/GAVI)

- **Program Oversight:** Assess the initiative compliance with regulations. The available metric in conformity with the Development Partners' guideline will be evaluated.
- **Funding Compliance:** Ensure proper allocation and utilization of funds for all grants related activities. Project Accountant to provide documentations that shows adherence to the signed mandate.
- **Stakeholder Engagement:** Evaluate partnerships with all other organizations and ministries. Review any applicable memorandum of understanding or mandate.

10. Agriculture Desk

- **Project Oversight:** Verify agricultural program adherence to NGF guidelines and objectives.
- **Budget Adherence:** Review expenditures and ensure alignment with planned agricultural budgets.
- **Stakeholder Involvement:** Evaluate collaboration with local and federal agricultural stakeholders.

Cross-Departmental Compliance and Governance Initiatives



1. Risk Assessment and Compliance Monitoring

- **Annual Risk Assessment for All Units:** Identify, document, and prioritize risks within each department and update the NGF Risk Register quarterly to address any emerging issues.
- **Compliance Tracking:** Implement a compliance tracking system to monitor all departments' adherence to relevant regulatory and internal standards.
- **Quarterly Compliance Audits:** Schedule regular audits of each department to assess compliance status, identify areas for improvement, and prevent non-compliance issues.

2. Policy Review and Standardization

- **Annual Policy Review:** Update internal policies to reflect best practices, legal changes, and operational needs. Prioritize key areas such as procurement, data protection, and employee conduct.
- **Process Standardization:** Develop standardized processes for high-risk activities (e.g., procurement, data handling, financial reporting) across departments.
- **Policy Training and Awareness Program:** Conduct quarterly training sessions to keep staff informed about new and existing policies, emphasizing the importance of compliance.
- **Standard Operating Procedure (SOP):** Development of standard operating procedure by each department and review for compliance.

3. Ethics and Governance Initiatives

- **Code of Conduct Training (e.g. HR):** Provide ongoing training and workshops on NGF's Code of Conduct to foster ethical behaviour across departments.
- **Conflict of Interest Declarations:** Implement a system for annual conflict of interest declarations and monitor adherence, especially in procurement and consultancy engagements.
- **Whistleblower Protection and Mechanism:** Establish a confidential mechanism for reporting violations, reporting anonymously through a dedicated email or phone number *with assurances of protection for whistleblowers*.

Timeline and Milestones

Activity	Timeline	Milestone
Risk Assessment and Annual Planning	December 2024	Plan Approved by DG
Quarterly Financial and Compliance Audits (Administration/Accounts)	March, June, September, December 2025	Report Submissions
IT and Cybersecurity Audit (ICT)	March and September 2025	Report Submission
Compliance and Procurement Review (Protocol Services)	April 2025	Report Submission
Annual Policy Review (Cross-Department)	April 2025	Updated Policy Document
Inter-Agency Compliance Audit (Federal Liaison); Projects/Grants Review of Compliance	June and December 2025	Report Submission
Quality Assurance Audit (Research, Consultancy, and Publications)	July 2025	Findings and Recommendations
Conflict of Interest and Ethics Workshop	Quarterly (Starting Q1)	Completed Each Quarter
Year-End Audit and Compliance Summary	December 2025	Comprehensive Year-End Report

Resource Requirements

Personnel and Development

- **Audit and Compliance Staff Augmentation:** Recruit additional specialized staff as necessary for effective audit implementation, particularly for technical areas such as IT and policy analysis.
- **Continuous Training:** Fund training and certifications in areas such as audit, regulatory compliance, IT security, and risk management for the audit team.

Technology and Tools

- **Audit Management Software:** Implement software for audit tracking, reporting, and data analytics.
- **Data Analytics and Visualization Tools:** Invest in advanced data analysis tools to facilitate in-depth audits and trend analysis across departments.

Reporting and Evaluation

- **Monthly Progress Reports:** Submit monthly progress updates, including key findings, recommendations, and follow-up actions.
- **Quarterly Review Meetings with DG:** Present updates on completed audits, highlight unresolved issues, and recommend solutions.
- **Annual Report and Next Year's Plan:** Provide a comprehensive year-end report and outline a proposed audit and compliance plan for the following year.

Approved Date: _____

AUDIT UNIVERSE	AUDIT ACTIVITIES	AUDIT OBJECTIVES	FREQUENCY
Audit & Compliance	Audit Plan	Prepare and submit on annual basis, the Internal Audit Plan the Board Audit and Risk Management Committee for Approval as Mandated by the Internal Audit Charter	Last Quarter every year
Administration/Accounts Unit	Pre - audit review of all transactions before processing for payments.	To ensure that only authorised transactions are processed for payments and that such transactions are for the benefits and interest of the Secretariat	Daily
	Controls around processing of transactions	To ensure that appropriate segregation of duties exist, and no individual staff can process transactions from initiation to completion.	Daily
	Financial Reporting	To ensure that financial statements have been prepared in accordance with the relevant IFRS standards, appropriate disclosures have been made accordingly and account balances properly classified.	Monthly
	Bank Reconciliations	To ensure that Bank reconciliations are prepared on monthly basis and that general ledger balances actually represent actual cash balances in Bank	Monthly
	Payroll review	Review payroll to ensure accuracy and completeness and ensure all statutory deductions (NHF, PAYE, Pension) have been made correctly and remitted timeously	Monthly
	Regulatory returns and remittances	To ensure that all regulatory remittances are made to the relevant agencies (FIRS, PENCOM, NHF, etc), within the stipulated time.	Monthly
	Review of General ledger maintenance and test of journal entries	To ensure that proper chart of accounts have been maintained, transactions are properly posted, and only authorised transactions are posted into the general ledger, through authorised journal entries.	Quarterly
	Review of the Budget System	To ensure that resources have been efficiently allocated to various aspects of the NGF's Operation.	Annually
	Fixed Asset Review	To ensure all fixed assets are recorded and a register is maintained to track the location an the use.	Bi-annually

Information Communication & Technology (ICT)	IT Procurements	To ensure that only authorised procurements are made by the ICT department and such procurements are wholly necessary for the benefit of the Secretariat and are within reasonable costs.	As it occurs
	Access Controls	To ensure that only authorised personnel have access to sensitive areas of the ICT department. e.g the Server room . NGF's information and records are protected from unauthorised access.	Monthly
	Cybersecurity Audit	Evaluate the effectiveness of data protection measures and protocols to prevent breaches.	Monthly
	Disaster Recovery Testing	Assess preparedness for potential data loss and system failures.	Quarterly
	Policy Compliance	Ensure that ICT policies, including usage, storage, and data sharing, are enforced effectively.	Bi-annually
	Back up procedures	To ensure that adequate backup procedures are in place	Quarterly
Office of the Director General	Pre - audit review of all transactions before payments are made	To ensure that all expenditure relating to the office of the DG are within limits approved by the Secretariat and have been reasonably incurred for the benefit of the Forum.	As it occurs
Protocol Services	Logistics efficiency review	Analyse processes for scheduling, coordinating, and documenting events for efficiency	Monthly
	Vendor evaluation	Review vendor selection and contracting for compliance with procurement standards.	Quarterly
	Expenditure analysis	Assess expenditures related to protocol services to ensure budget adherence and transparency.	As it occurs
	Risk assessment	Identify potential risks associated with event management and develop mitigation strategies.	Quarterly
Stakeholders Engagement/Policy Analysis	Policy evaluation	Review selected policies for consistency, completeness, and alignment with strategic objectives.	Quarterly
	Documentation review	Assess the quality of documentation for completeness and compliance with standards.	Bi-annually

	Stakeholder feedback analysis	Gather feedback from relevant stakeholders to evaluate the effectiveness and accuracy of policy analysis.	Quarterly
	Process review	Evaluate the steps in policy formulation for consistency and compliance with NGF's objectives.	Bi-annually
Human Resources	Payroll audit	Ensure accuracy and compliance in payroll and benefits disbursements.	Monthly
	Recruitment Process Review	Assess recruitment and selection for transparency and adherence to HR policies.	Quarterly
	Compliance Assessment	Review compliance with labour laws, including contracts, safety regulations, and employee rights.	Bi-annually
	Performance Management Audit	Evaluate the performance appraisal system for fairness and alignment with the NGF's strategic objectives.	Bi-annually
	Training and Development	Review HR's role in supporting employee development and assess training program effectiveness.	Quarterly
Research Consultancy and Publications	Research Quality Assessment	Evaluate research reports for accuracy, relevance, and adherence to academic standards.	Bi-annually
	Publication Compliance	Ensure that publications comply with internal and external guidelines.	Bi-annually
	Process Review	Review the processes for research project initiation, management, and completion.	Bi-annually
	Stakeholder Review	Assess feedback from end-users of publications to evaluate effectiveness and applicability.	Bi-annually
Federal Liaison and Technical Support	Communication Audit	Assess the effectiveness and timeliness of communications with federal agencies.	Bi-annually
	Stakeholder Engagement	Evaluate the feedback from stakeholders on the quality and adequacy of technical support.	Bi-annually
	Documentation Review	Ensure that all engagements and technical support activities are well-documented and filed appropriately.	Bi-annually
	Risk Management	Identify risks associated with federal liaison activities and propose mitigation strategies.	Bi-annually

Health Desk Gender Desk Helpdesk Projects/Grants (SABER/IGR/BMGF/UNICEF/GAVI) Agric Desk Education Desk Library	Financial Audit	Ensure all payments are in line with the approved Budget by the Development Partner. Assess the timeliness of required reporting as requested by the donor.	Bi-annually
	Compliance Audit	Ensure all activities are as contained in the project guidelines and within the NGF's responsibilities	Bi-annually
	Stakeholder Engagement	Evaluate the feedback from Development Partners on the quality and adequacy of technical support.	Continuously