

United Nations Development Programme

Harmonised Approach to Cash Transfers Framework

Micro-Assessment of the Pacific Islands Forum Fisheries
Agency

Solomon Islands

2019





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25 July 2019

Dear Sir/Madam

We have completed our HACT Micro-Assessment of the Pacific Islands Forum Fisheries Agency ("FFA", "Implementing Partner" or "IP").

Our assessment may not have identified, and the comments in this report may not be a comprehensive record of, all the issues that may exist.

The responsibility for the maintenance of an adequate internal control system as well as the prevention and detection of irregularities, including fraud, rests with those charged with the governance of the IP.

This report includes internal control findings which we consider appropriate for consideration by FFA and is intended solely for the use of the IP and the UNDP Pacific Office in Fiji.

We wish to thank the staff and employees of the IP and the UNDP Pacific Office in Fiji for the cooperation and courtesy extended to us during our Micro Assessment. We appreciate the opportunity to present these recommendations for your consideration.

Yours sincerely

Sikeli Tuinamuana
Partner

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1. Background, Scope and Methodology

1.1 Background

The micro assessment is part of the requirements under the Harmonized Approach to Cash Transfers (HACT) Framework. The HACT Framework represents a common operational framework for UN agencies' transfer of cash to government and non-governmental implementing partners.

The micro-assessment assesses the IP's control framework. It results in a risk rating (low, moderate, significant or high). The overall risk rating is used by the UN agencies, along with other available information (e.g. history of engagement with the agency and previous assurance results), to determine the type and frequency of assurance activities as per each agency's guideline and can be taken into consideration when selecting the appropriate cash transfer modality for an IP.

1.2 Scope

The micro-assessment provides an overall assessment of the Implementing Partner's programme, financial and operations management policies, procedures, systems and internal controls. It includes:

- ▶ A review of the IP legal status, governance structures and financial viability; programme management, organizational structure and staffing, accounting policies and procedures, fixed assets and inventory, financial reporting and monitoring, and procurement; and
- ▶ A focus on compliance with policies, procedures, regulations and institutional arrangements that are issued both by the Government and the Implementing Partner.

It takes into account results of any previous audits and micro assessments conducted of the Implementing Partner.

1.3 Methodology

We performed the micro-assessment from 8th April to 12th April 2019 at the 1 Koloale Road, Honiara, Solomon Islands.

Through discussion with management, observation and walk-through tests of transactions, we have assessed the Implementing Partner's and the related internal control system with emphasis on:

- ▶ The effectiveness of the systems in providing the Implementing Partner's management with accurate and timely information for management of funds and assets in accordance with work plans and agreements with the United Nations agencies; and
- ▶ The general effectiveness of the internal control system in protecting the assets and resources of the Implementing Partner.

We discussed the results of the micro assessment with applicable UN agency personnel and the IP prior to finalization of the report. The list of persons met and interviewed during the micro-assessment is set out in Annex IV.

2. Summary of Risk Assessment Results

In summary, we conclude that the overall assessment of the Implementing Partner's programme, financial and operations management policies, procedures, systems and internal controls with regards to cash transfers is Low.

The current processes and procedures can be improved further. The issues identified are areas for improvement that we believe should be addressed.

We believe that it is important for the IP to understand the impact of their work on managing overall risk.

The issues highlighted warrant timely action and will remain a risk to the IP until they are addressed.

The table below summarizes the results and main internal control gaps found during application of the HACT micro-assessment questionnaire (in Annex VI). Detailed key findings and recommendations are set out in Section 3 below.

Tested subject area	Risk assessment	Brief justification for rating
1. Implementing partner	Low	Adequate controls
2. Programme management	Moderate	Moderate controls
3. Organizational structure and staffing	Moderate	Moderate controls except for certain findings detailed in Section 3 of this report.
4. Accounting policies and procedures	Low	Adequate controls
5. Fixed assets and inventory	Low	Adequate controls
6. Financial reporting and monitoring	Low	Adequate controls
7. Procurement	Low	Adequate controls except for certain findings detailed in Section 3 of this report.
Overall Risk Assessment	Low	

3. Internal Control Findings and Recommendations

No.	Description of Finding	Recommendation
1.	<p><u>In-adequate internal audit staffing</u></p> <p>Checklist Category: 3.4</p> <p>Risk Ranking: Significant</p> <p>Internal audit oversight is too far spaced and lacks relevant resources to conduct more frequent periodic internal audits. Audits are conducted every 1-2 years, based on a review of the most recent internal audit plan tabled to the Audit Committee. For an organisation of its size, internal audits should be conducted quarterly or more frequently.</p> <p>Internal audit function is present but not as effective as it could be due to it being handled by only one person, the internal auditor.</p> <p>Implication</p> <p>The UNDG HACT Framework requires the UN agency to ensure sufficient controls are in place to manage agency funds. Monitoring of these controls is a function that is performed by internal audits. Conducting internal audits that are too far spaced poses a risk that significant control deficiencies may not be identified and mitigated in a timely manner.</p> <p>This above observation and related implication increases the overall risk of the IP.</p>	<p>We recommend that the IP consider employing more resources in this area to ensure that the function of internal audit is performed effectively.</p> <p>IP Comment: This has already been the subject of initial discussions by the FFA Executive and Audit Committee. A submission is coming forward with the intention to address this matter in the Audit Committee and Revised FFA budget in October.</p> <p>UN Agency Comment: FFA should use the internal audit department more efficiently as that will reduce the risk. The Corporate Service Director stated that the audit committee is very serious regarding the audit opinion from external auditors. The IP should be resourced with more staff to mitigate the risk, as that will reduce the workload and they can have regular internal audit.</p>
2.	<p><u>Lack of monitoring over past suppliers</u></p> <p>Checklist Category: 7.13</p> <p>Risk Ranking: High</p> <p>The IP does not keep formal record of the performance of past suppliers as a form of ensuring that such suppliers are avoided in future.</p> <p>Implication</p> <p>The UNDG HACT Framework requires the UN agency implement a monitoring system of past supplier performances to ensure that a formal record is maintained as a point of reference when similar suppliers need to be engaged in.</p> <p>This above observation and related implication increases the overall risk of the IP.</p>	<p>We recommend that the IP consider implementing a procedure to formally document the performance of past suppliers, to aid in sound decision making, going forward.</p> <p>IP Comment: This is done through a number of means but we do not have a formal 'Performance Record' as such. We plan to amend our procedures to include this, which can be done relatively easily.</p> <p>UN Agency Comment: This observation is very high risk for UNDP funded projects. There should be a performance evaluation done for each supplier, determining the supplier credibility.</p>

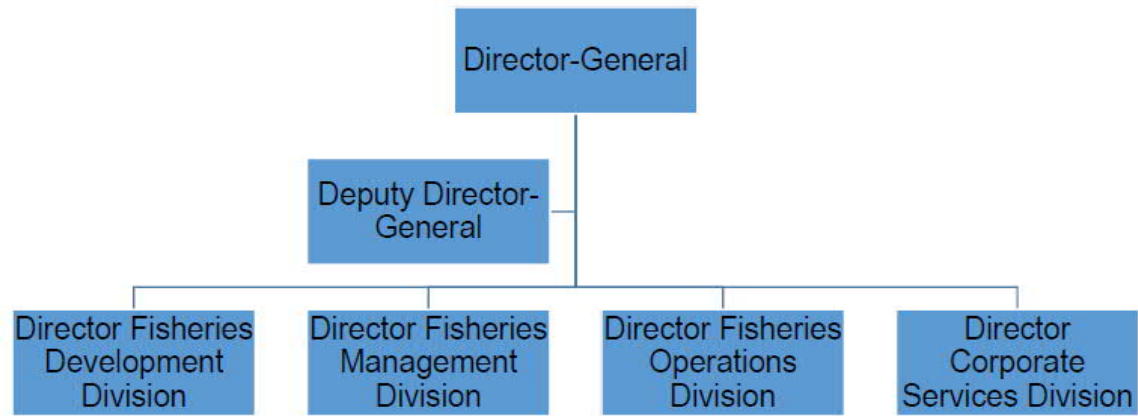
Annexes

Annex I: IP and Programme Information

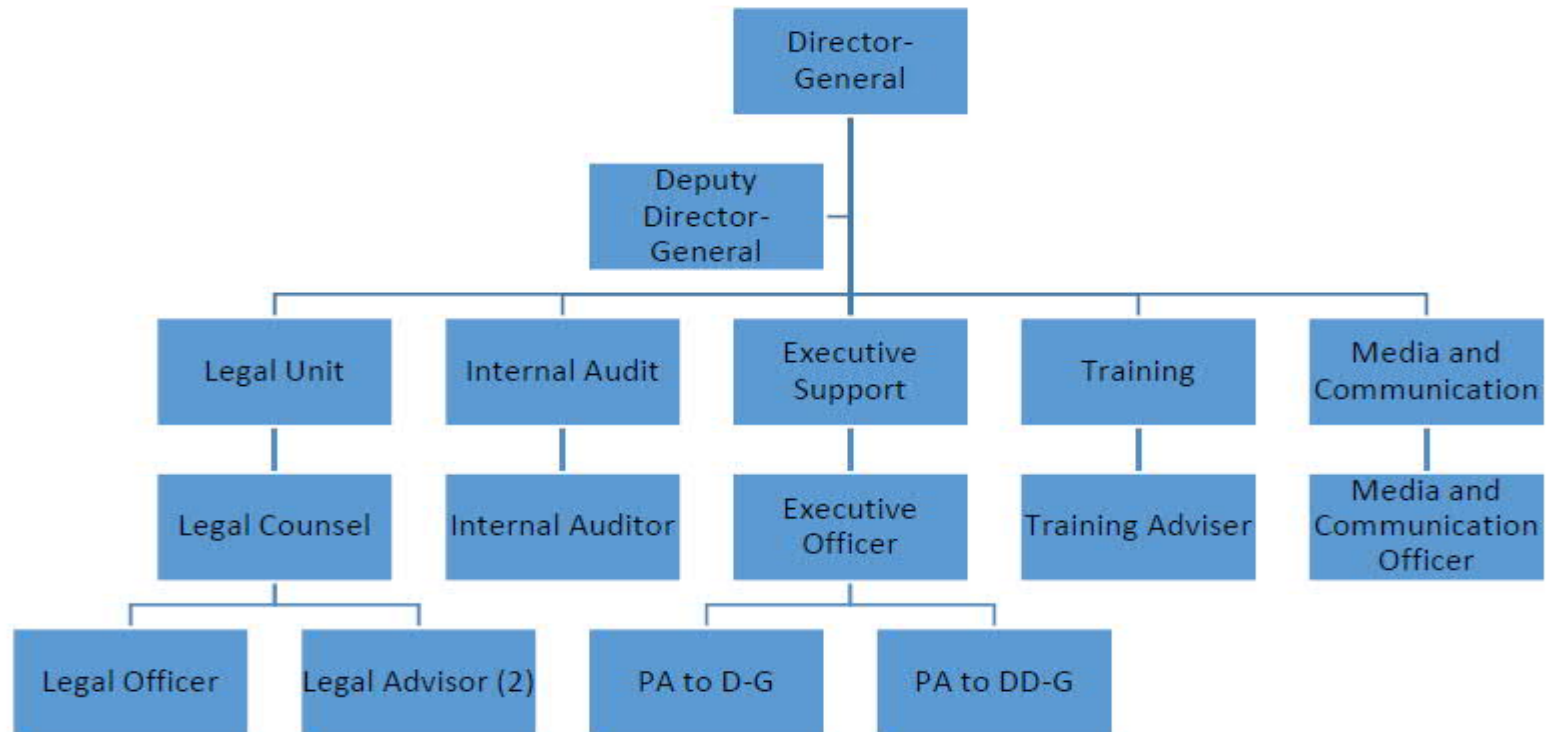
Implementing partner name:	FFA
Implementing partner code or ID in UNICEF, UNDP, UNFPA records (as applicable)	UNDP
Implementing partner contact details (contact name, email address and telephone number):	Mr Hugh Walton Email: hugh.walton@ffa.int
Main programmes implemented with the applicable UN Agency/ies:	PIOFMII
Key Official in charge of the UN Agency/ies' programme(s):	Loraini Sivo
Programme location(s):	Honiara, Solomon Island
Location of records related to the UN Agency/ies' programme(s):	Solomon Islands
Currency of records maintained:	SBD
Expenditures incurred/reported to UNICEF, UNDP and UNFPA (as applicable) during the most recent financial reporting period (in US\$):	USD 1,806,488
Cash transfer modality/ies used by the UN agency/ies to the IP	Advance
Intended start date of micro assessment:	ASAP
Number of days to be spent for visit to IP:	5 Days
Any special requests to be considered during the micro assessment:	

Annex II: Implementing Partner Organisation Structure

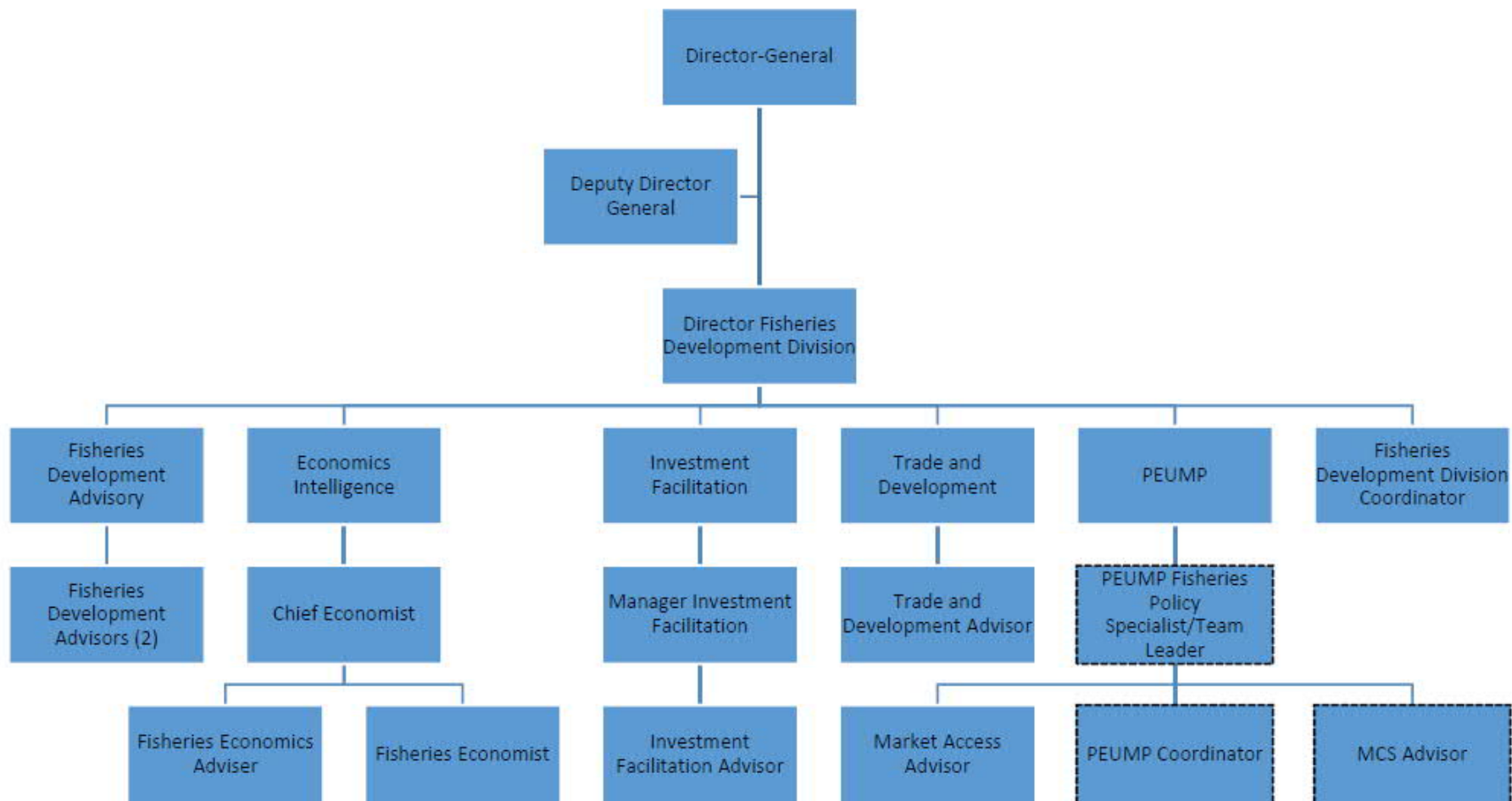
Overall High-Level Structure



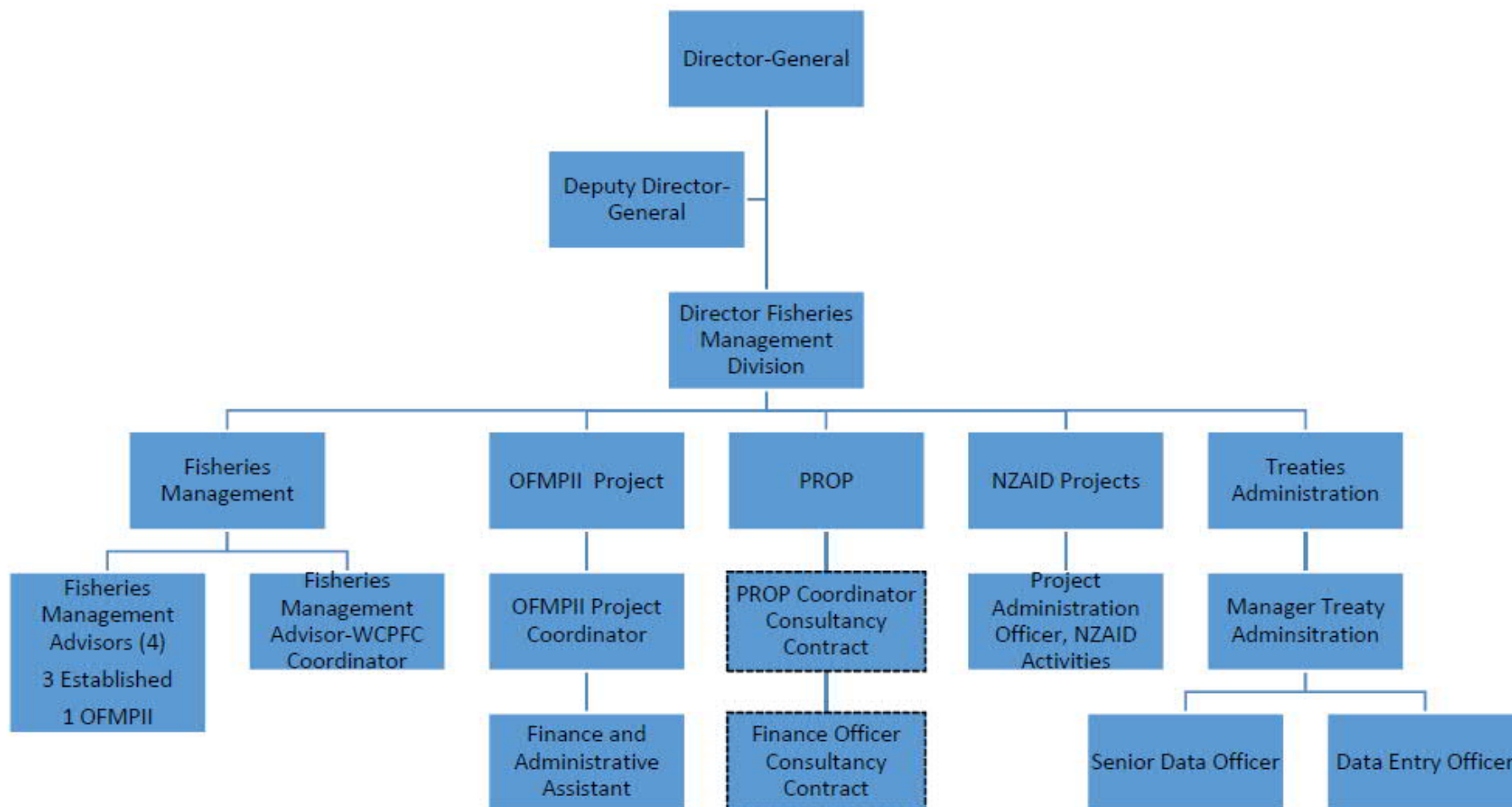
High Level Advice



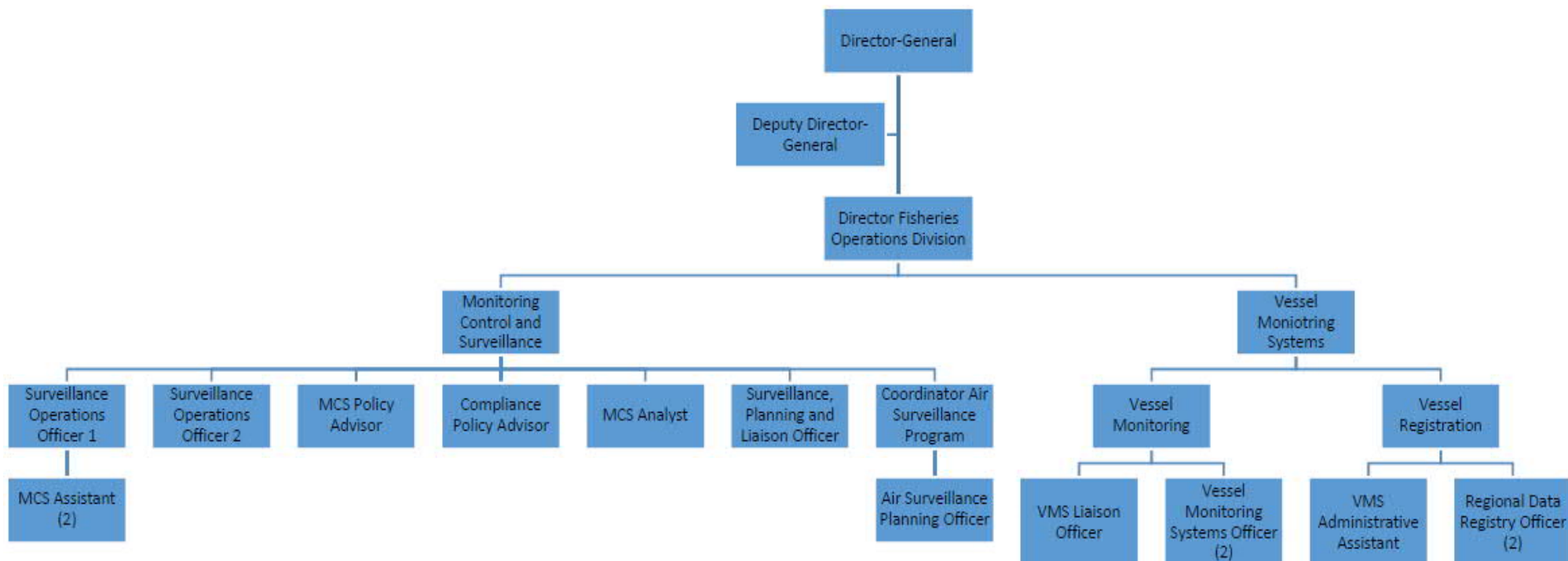
Fisheries Development Division



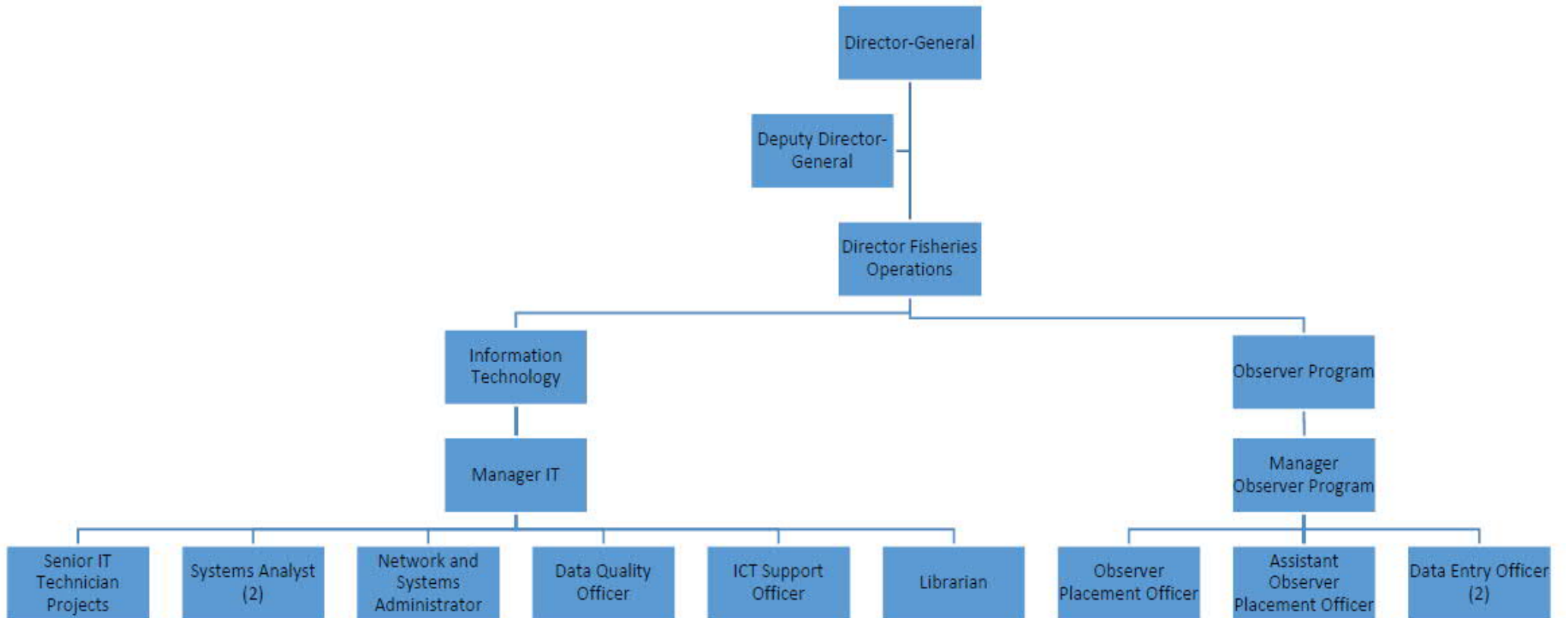
Fisheries Management Division



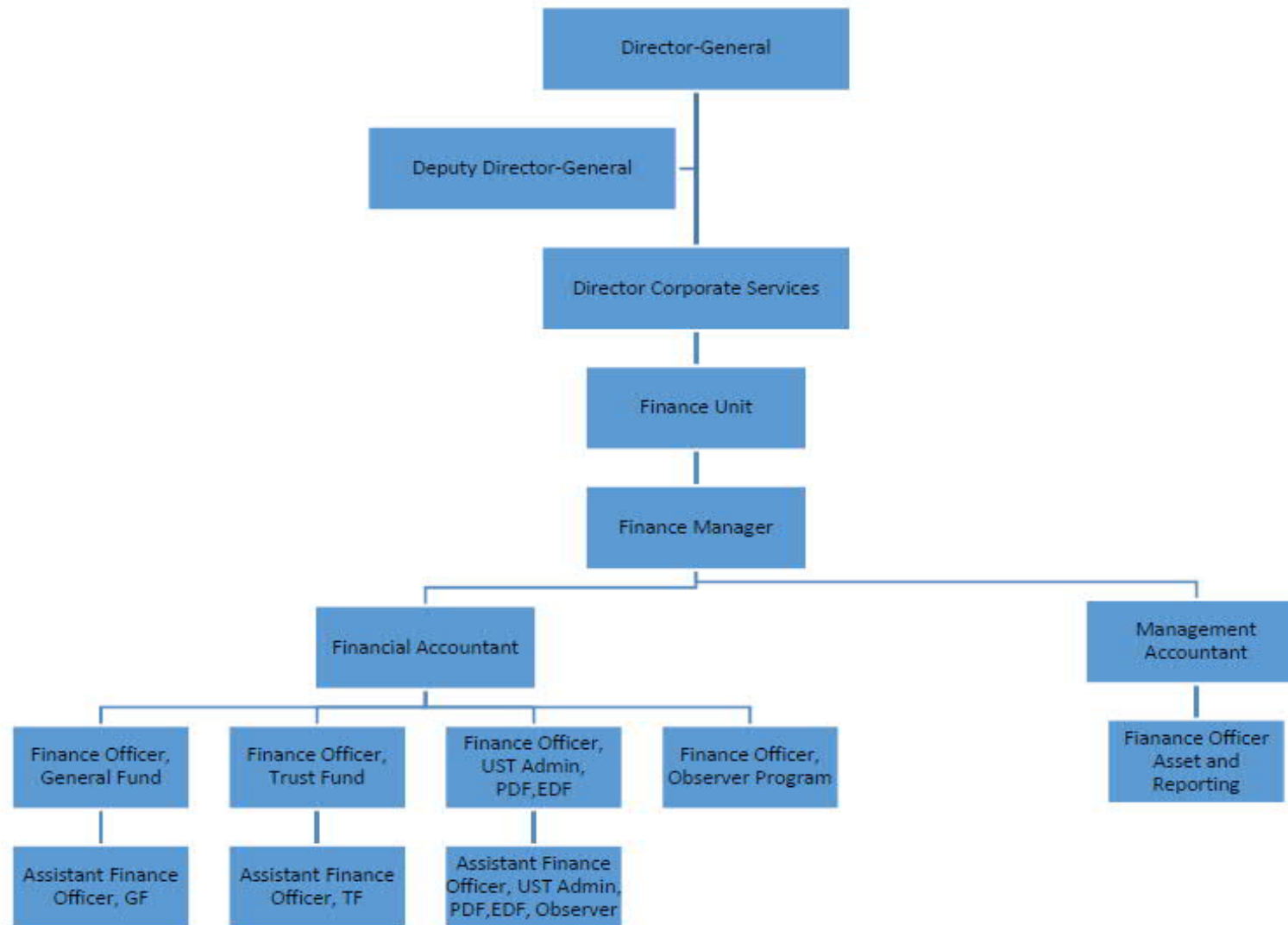
Fisheries Operations Division



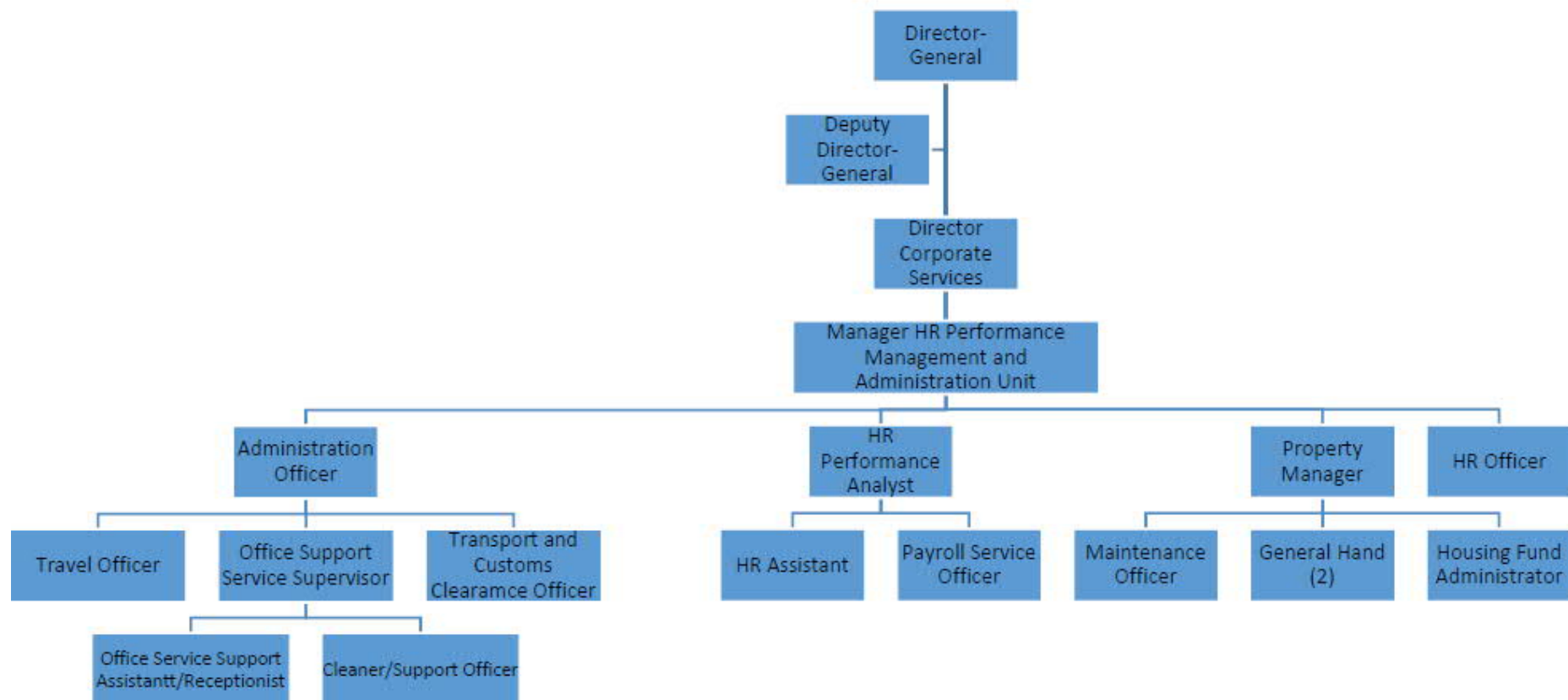
Fisheries Operations Division



Corporate Services Division



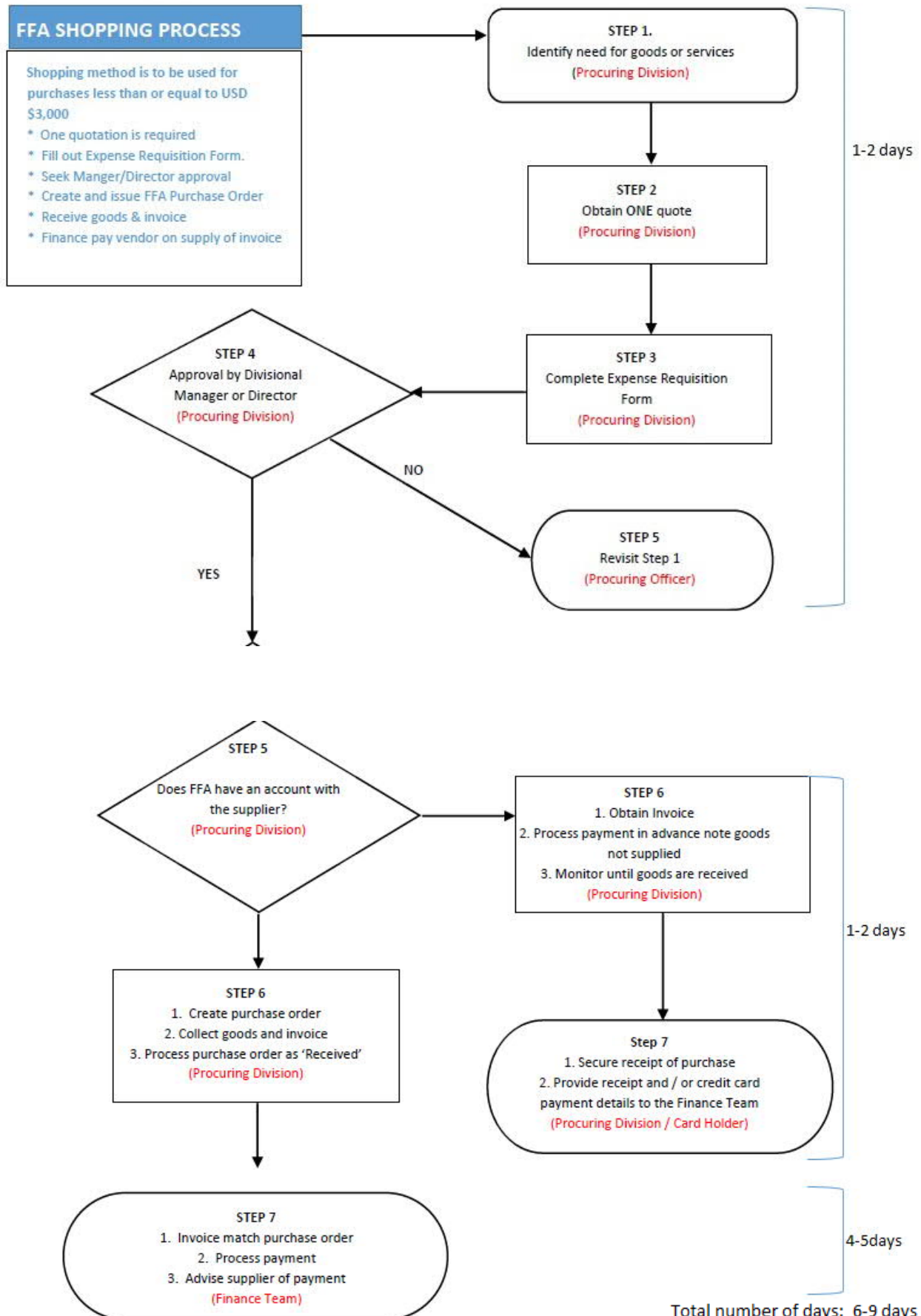
Corporate Services Division



Annex III: Work/Time Flow Diagrams

► Procurements: Below \$3000 USD

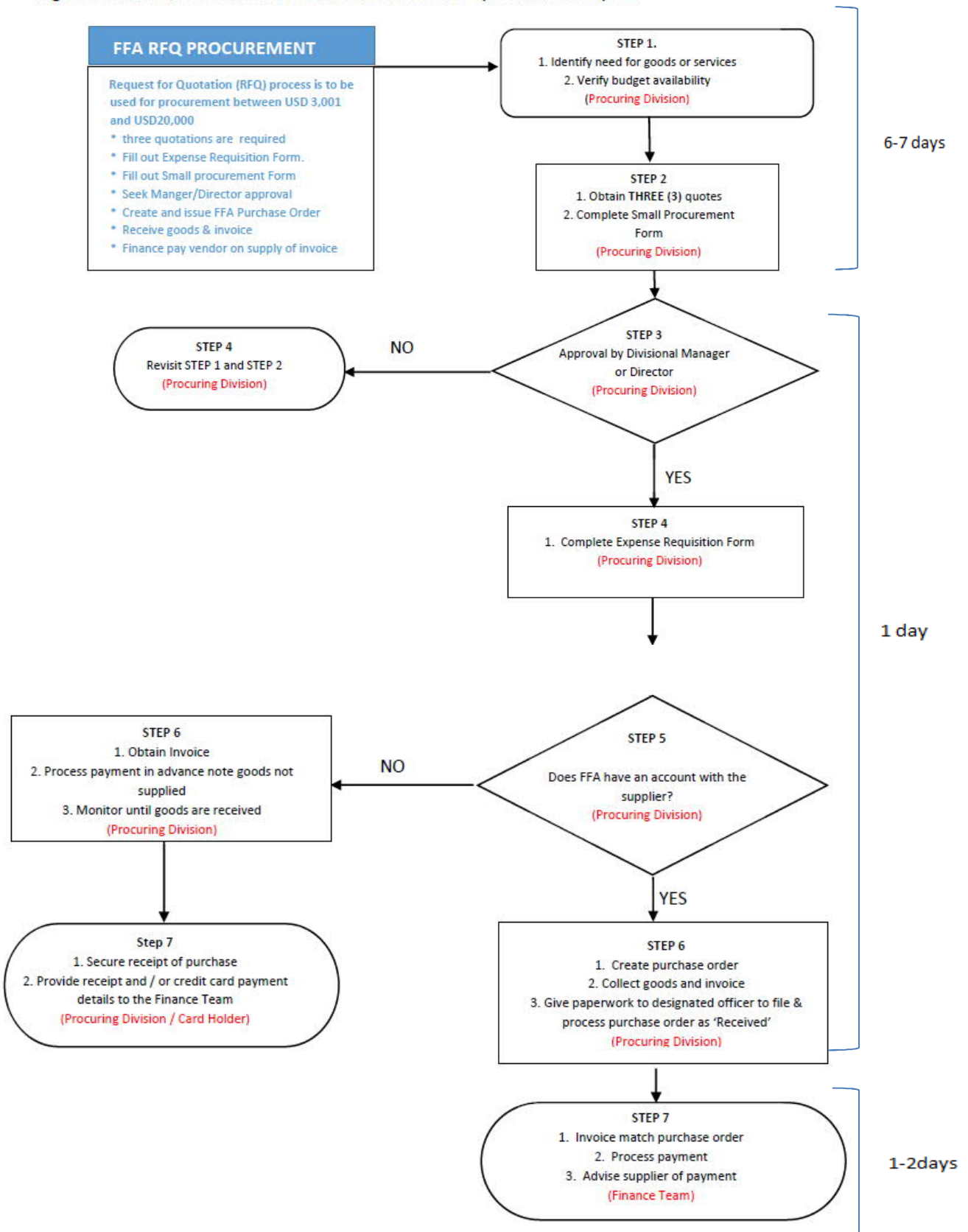
Figure 1: FFA Shopping Procurement Process



Annex III: Work/Time Flow Diagrams

- Procurements: Between \$3000 USD and \$20,000 USD

Figure 2: FFA RFQ Process for Procurement between USD 3,001 and USD20,000.

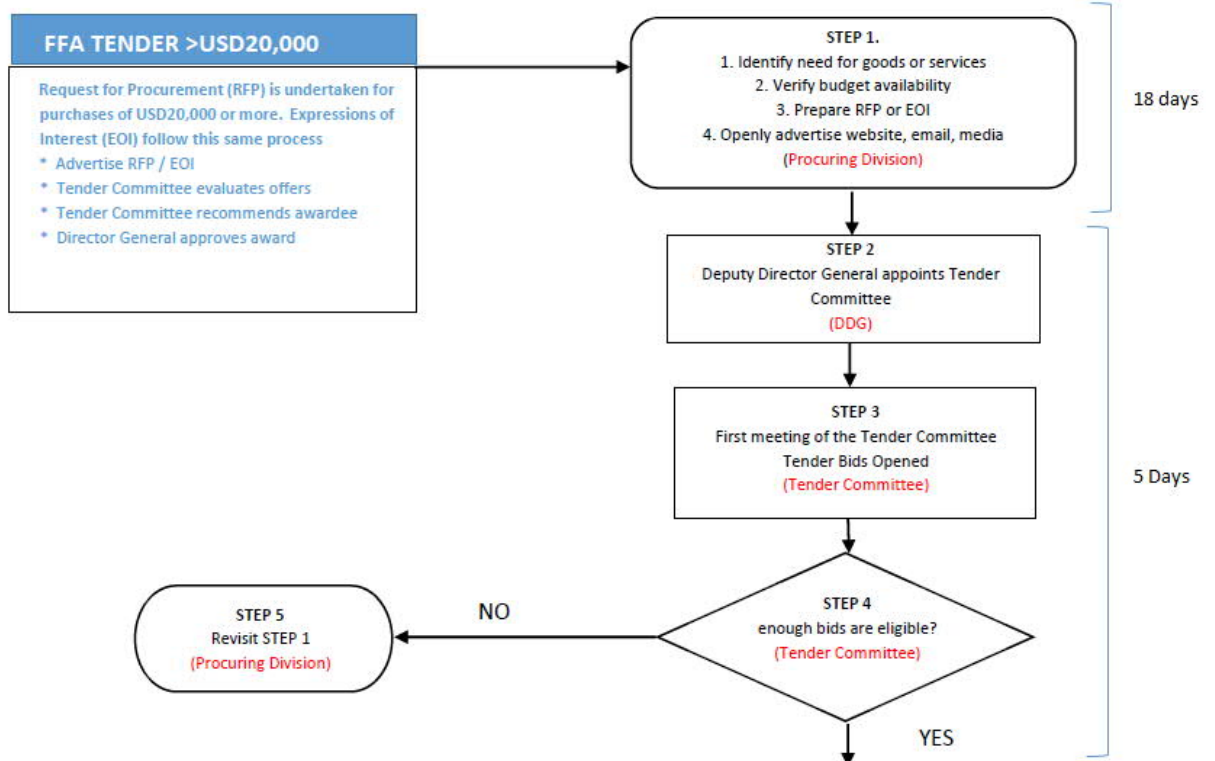


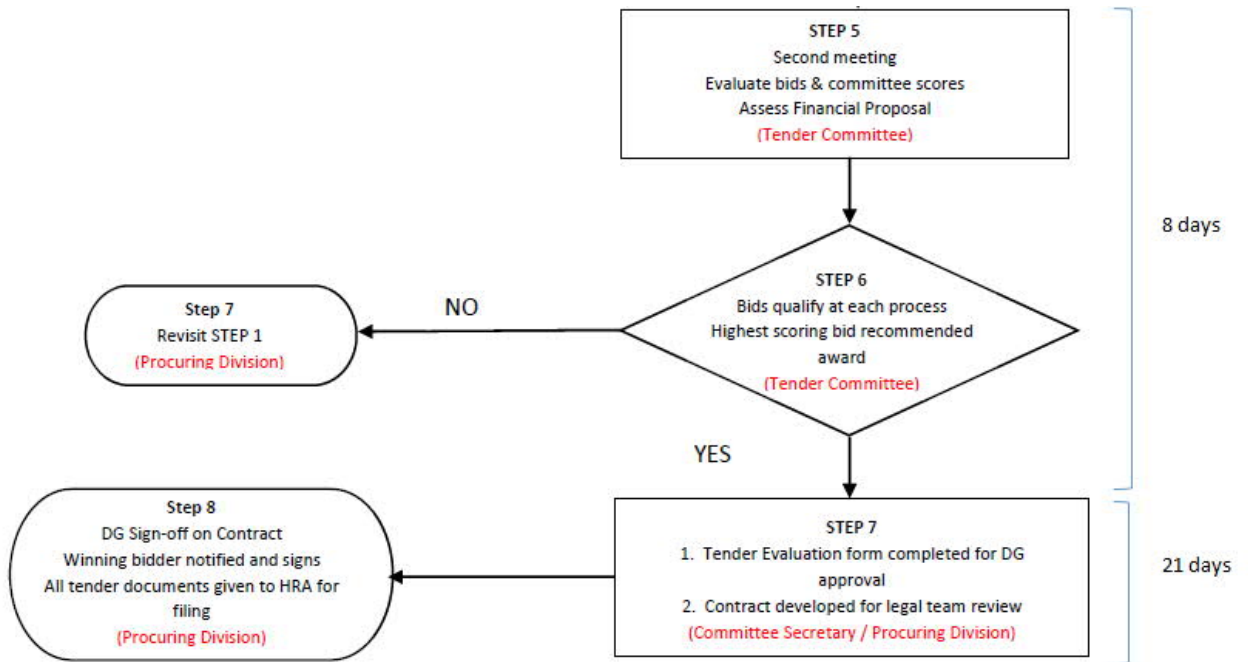
Annex III: Work/Time Flow Diagrams

Total number of days: 8-10 days

- Procurements: Over \$20,000 USD

Figure 3 - outlines the process for tendering a procurement:

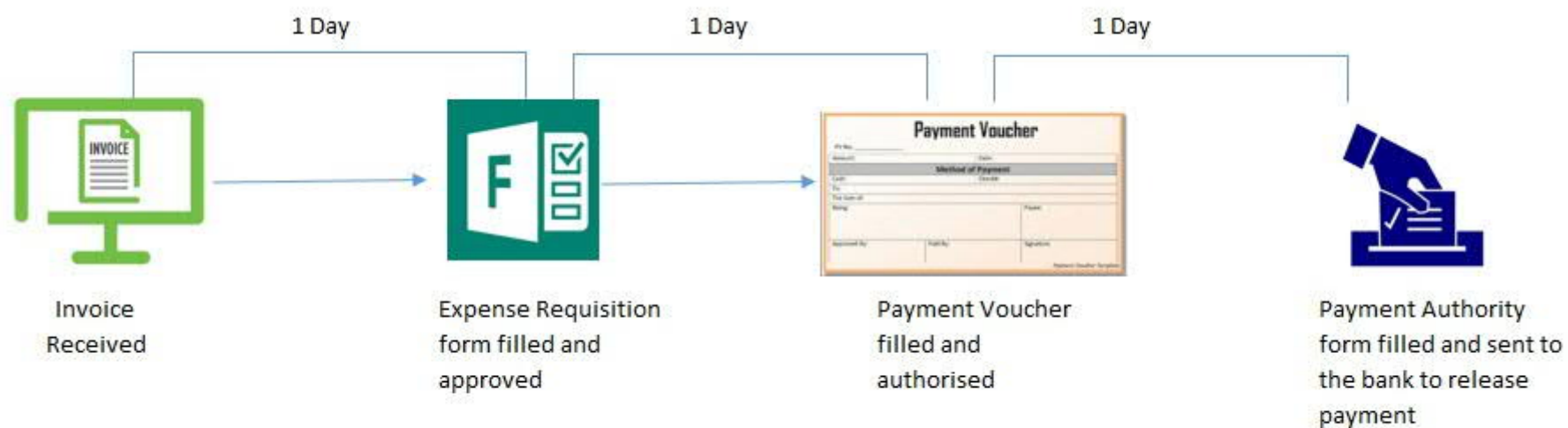




Total number of days: 52 days

Annex III: Work/Time Flow Diagrams

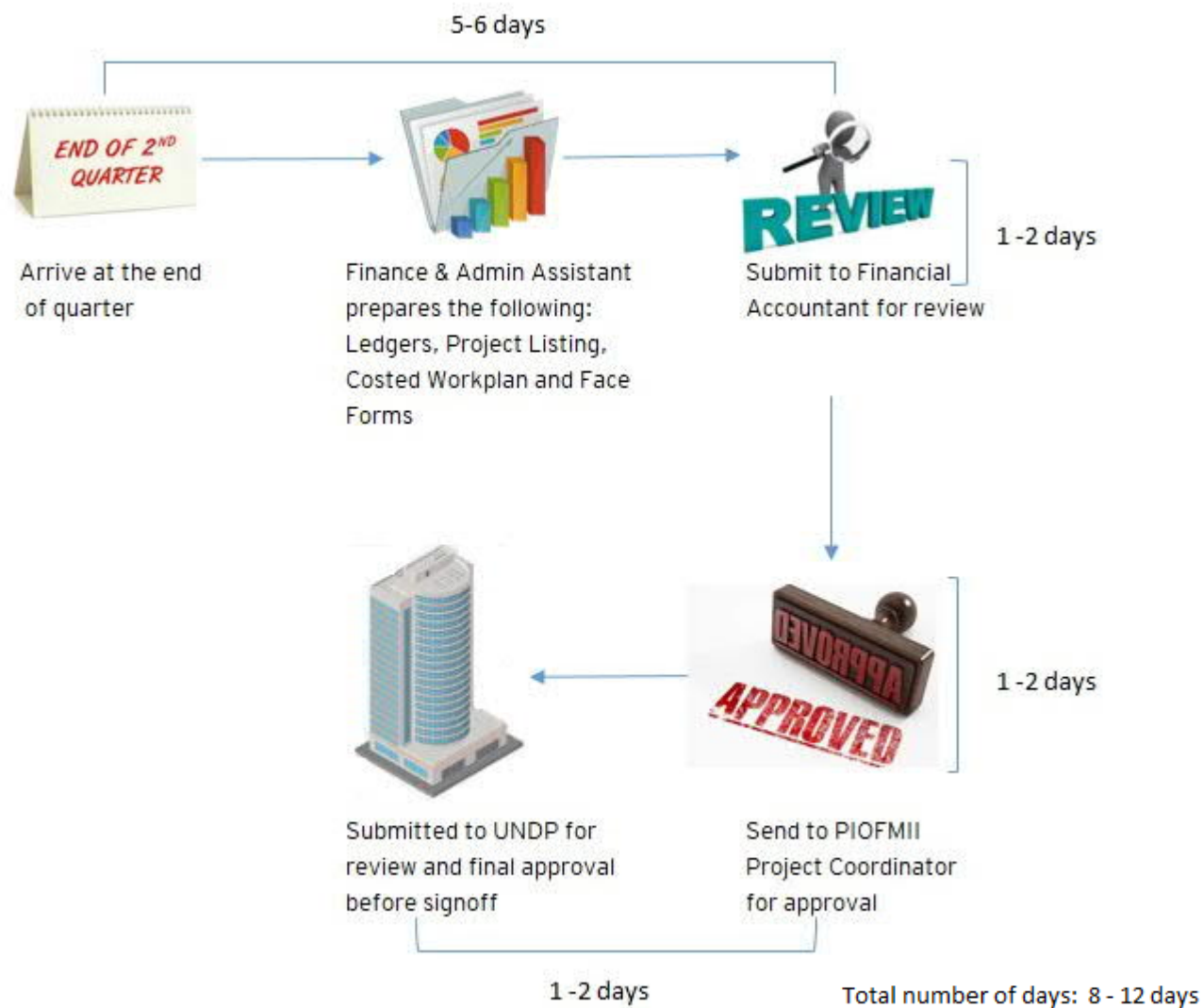
► Payments



Total number of days: 3 days

Annex III: Work/Time Flow Diagrams

- ▶ Financial reports (Face forms- process of their reporting- walkthrough one) from Treasury or Ministry of Finance (if applicable)



Annex IV: List of Persons Met

- a. During the micro assessment
- b. Prior to finalising the micro assessment (discussed the results with prior to finalisation)

Name	Unit/Organisation	Position
a. During the micro assessment		
Perry Head	Director Corporate Services	High Level Advice
Keva Robarobalevu	Internal Auditor	High Level Advice
Hugh Walton	PIOFMII - Project Coordinator	Fisheries Management Division
Sireta Laore	Finance and Administrative Assistant	Fisheries Management Division
Kauka Havea	Financial Accountant	Corporate Services Division
Lemmy Alufurai	Travel Officer	Corporate Services Division
Viola Levy	HR Performance Analyst	Corporate Services Division
Janet Houkarawa	Human Resources Officer	Fisheries Development Division
Royden Gholomo	Finance Officer Asset and Reporting	Corporate Services Division
Sione Havea	Property Manager	Corporate Services Division
Martha Mangale	PROP Finance Officer	Fisheries Management Division
Judy Arumae	PROP Regional Coordinator Local Individual Consultancy	Fisheries Management Division
Luisa Tagicakibau	Project Administration Officer	Fisheries Management Division/Corporate Services Division
Anama Solofa	PEUMP Fisheries Policy Specialist and Team Leader	Fisheries Development Division
b. Prior to finalizing the micro assessment (discussed the results with prior to finalisation)		
Perry Head	Director Corporate Services	High Level Advice

Annex V: List of Key Documents

Doc #	Name of Document	Date Submitted	Received and Reviewed by Audit Firm prior to Field Trip
1.	UNDP HACT Assessment Form	4/4/2019	Yes
2.	FFA Convention (Registration Documents)	9/4/2019	No
3.	2016-2018 Signed Financial Statements	9/4/2019	No
4.	Solicitors Confirmation Letter	10/4/2019	No
5.	Governance Policy	9/4/2019	No
6.	Grant agreements for previous UN funded projects	10/4/2019	No
7.	Enterprise Risk Register	9/4/2019	No
8.	Annual Audit Plan	9/4/2019	No
9.	Financial Procedures Manual	9/4/2019	No
10.	FFA Staff Regulations	9/4/2019	No
11.	Organisation Structure	9/4/2019	No
12.	FFA Staff Listing	12/4/2019	No
13.	Quarter 1 to Quarter 4 Face Forms	9/4/2019	No
14.	Contract of employment and CVs of UN project staff	9/4/2019	No
15.	Annual Work plan	9/4/2019	No
16.	Financial Regulations	9/4/2019	No
17.	IT Policy	12/4/2019	No
18.	Fixed Asset Register	10/4/2019	No
19.	Risk Management Policy and Procedures	9/4/2019	No
20.	Contracts with various suppliers	11/4/19	No
21.	Sample tender/bid evaluation procedures (tender registration, minutes of tender committee and evaluation report)	8/4/2019	No
22.	Sample DSA/Per diem Payment Supporting documents	11/4/2019	No
23.	Procurement Policy	8/4/2019	No
24.	Most recent annual report	9/4/2019	No
25.	Oversight Board Meeting Minutes	9/4/2019	No
26.	High Level Organisation Structure	9/4/2019	No
27.	Human Resource Policy Manual	9/4/2019	No
28.	General ledger chart of accounts	9/4/2019	No
29.	Most recent petty cash reconciliation	9/4/2019	No
30.	Per diem and Travel Policy Manual	29/4/2019	No
31.	Most recent management reporting to the Board	9/4/2019	No
32.	Organisation monitoring and evaluation framework	9/4/2019	No
33.	Planned capital commitments	9/4/2019	No

Annex VI: HACT Framework Micro-Assessment Questionnaire

Micro assessment workbook

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
1. Implementing Partner						
1.1 Is the IP legally registered? If so, is it in compliance with registration requirements? Please note the legal status and date of registration of the entity.	Yes			Low	1	<p>The IP is an Intergovernmental body established in 1979 under a formal treaty known as the South Pacific Forum Fisheries Agency Convention (hereinafter "FFA Convention"). The Members of the FFA are: Australia, Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Marshall Islands, Nauru, New Zealand, Niue, Palau, Papua New Guinea, Samoa, Solomon Islands, Tokelau, Tonga, Tuvalu, Vanuatu.</p> <p>Article VIII of the FFA Convention provides the legal status, privileges and immunities of the IP. The IP has legal personality and in particular the capacity to contract, to acquire and dispose of movable and immovable property and to sue and be sued. According to the aforementioned provision, the premises, archives and property of the IP are inviolable.</p> <p>The Agreement Concerning the Status, Privileges and Immunities of the South Pacific Forum Fisheries Agency in Solomon Islands between the Government of the Solomon Islands and the FFA agreed 10 August 1984 defines the status, privileges and immunities in Solomon Islands of the South Pacific Forum Fisheries Agency and its officers. Pursuant to Article 2 of that agreement, the IP has the legal capacity of a body corporate, including the capacity to conclude contracts, and dispose of property, to sue and, subject to Article 3, to be sued. Article 3 sets out the privileges and immunities of the IP, including but not limited to circumstances where there is immunity from suit and legal process.</p>
1.2 If the IP received United Nations resources in the past, were significant issues reported in managing the resources, including from previous assurance activities.		No		Low	1	The IP has received a variety of UNDP/FAO and other UN support and engagement since 1979 and has not encountered significant issues. In addition to the current OFMP-2, the IP receives additional modest support from FAO. Assurance activities initiated by UNDP have not reported any

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						significant issue on the management of UN resources in the past. However, assurance activities by the other donors and internally by the IP reported the need to update and improve the IP's procurement and governance processes - such improvements have since been made.
1.3 Does the IP have statutory reporting requirements? If so, are they in compliance with such requirements in the prior three fiscal years?	Yes			Low	1	<p>Pursuant to its constituent instrument and rules and regulations, the IP has various reporting requirements.</p> <p>The FFA Convention requires the reporting of the work programme and budget to the governing body of the IP, namely the Forum Fisheries Committee, on an annual basis. In particular, Article VI.4 of the FFA Convention provides that the IP must submit to the said Committee: (a) an annual report on the activities of the Agency for the preceding year; (b) a draft work programme and budget for the succeeding year.</p> <p>Further, the Financial Regulations of the IP contain several regulations governing matters such as the budget, appropriations, contributions received by the IP, funds, audits, and internal controls. In accordance with the financial rules the IP is to submit to its governing body, an audited report of its financial performance and position prepared in accordance with the International Public Sector Accounting Standards (IPSAS). In sum, the abovementioned reporting requirements have been complied with in the prior three fiscal years.</p>
1.4 Does the governing body meet on a regular basis and perform oversight functions?	Yes			Low	1	<p>The Forum Fisheries Committee (FFC) meets in May (officials) and July (Ministers) every year. The Audit Committee (AC), which is a sub-committee of the FFC, also meets twice a year. The AC and FFC scrutinize Annual Work program and Budget, the annual Statements of Intent, examine the External Auditor's report on the FFA's Statement of Accounts, approve the Work Program of the Internal Auditor, and examine and advise on relevant key policies and processes. There are 2 other annual standing meetings of FFC officials, in October following the Management Options Committee (MOC) and AC meetings normally held in October/November and prior to the Western Central Pacific Commission (WCPFC) annual meeting normally held in December. Two other FFC Sub-Committees, the Monitoring, Control and Surveillance</p>

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments																				
						(MCS) Working Group and the South Pacific Tuna and Billfish Committee also meet once in a year.																				
1.5 If any other offices/ external entities participate in implementation, does the IP have policies and process to ensure appropriate oversight and monitoring of implementation?	Yes			Moderate	4	The IP received donor support from a variety of sources, as reflected in its Annual Work Program and Budget. The FFA meets both FFC and individual donor requirements (reporting Steering Groups etc.) in the management of these funds, which in the case of donors are through signed agreements. In respect of implementation, the FFA maintains MOUs with both the Pacific Community and the Parties to the Nauru Agreement Organisation (PNAO, which form the basis of any joint activities agreed to and which may be supported by donors.																				
1.6 Does the IP show basic financial stability in-country (core resources; funding trend) Provide the amount of total assets, total liabilities, income and expenditure for the current and prior three fiscal years.	Yes			Low	1	<p>The FFA produces a 5 year forward -looking funding prognosis that demonstrates a sound position as of March 2019. The current 2018/19 AWPB is valued at USD 30.5 million, including carry-forwards of around USD 2.7 million from 2017/18. The externally audited accounts, for the past 3 years, which have all been unqualified, detail the income and expenditure for these years and can be provided. Total assets, liabilities, income and expenditure for the last 3 fiscal years is tabulated in the next worksheet titled "AssetLiablncExp3yrs".</p> <table border="1"> <thead> <tr> <th>Financial Year</th> <th>Assets</th> <th>Liabilities</th> <th>Income</th> <th>Expenditure</th> </tr> </thead> <tbody> <tr> <td>30-Jun-18</td> <td>21,664,566</td> <td>19,897,451</td> <td>22,965,394</td> <td>22,903,648</td> </tr> <tr> <td>30-Jun-17</td> <td>22,335,399</td> <td>20,630,030</td> <td>19,520,979</td> <td>19,193,455</td> </tr> <tr> <td>30-Jun-16</td> <td>17,410,914</td> <td>16,033,069</td> <td>17,007,984</td> <td>17,657,671</td> </tr> </tbody> </table> <p>Source: Signed Audited Financial Statements for the respective years</p>	Financial Year	Assets	Liabilities	Income	Expenditure	30-Jun-18	21,664,566	19,897,451	22,965,394	22,903,648	30-Jun-17	22,335,399	20,630,030	19,520,979	19,193,455	30-Jun-16	17,410,914	16,033,069	17,007,984	17,657,671
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30-Jun-18	21,664,566	19,897,451	22,965,394	22,903,648																						
30-Jun-17	22,335,399	20,630,030	19,520,979	19,193,455																						
30-Jun-16	17,410,914	16,033,069	17,007,984	17,657,671																						
1.7 Can the IP easily receive funds? Have there been any major problems in the past in the receipt of funds, particularly where the funds flow from government ministries?	Yes			Low	1	The IP does not experience difficulty in receiving funds into Solomon Islands from a variety of donors and in various currencies. IP receives only very limited funds from Government Ministries in the form of membership contributions, which when Australia and New Zealand are excluded amount to less than 2% of total revenue and are therefore not material. All donor funding is provided by various donors.																				

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
1.8 Does the IP have any pending legal actions against it or outstanding material/significant disputes with vendors/contractors? If so, provide details and actions taken by the IP to resolve the legal action.		No		Low	1	The IP does not have any pending legal actions against it or outstanding material/significant disputes with vendors or contractors.
1.9 Does the IP have an anti-fraud and corruption policy?	Yes			Low	1	The IP's anti-fraud and corruption Policies are detailed in the "FFA Corporate Governance Policy 2016", and the "FFA Financial Procedures Manual 2019", which are both available at all times on the FFA Intranet. IP management doesn't tolerate fraudulent behaviour and is committed to minimizing the risk of fraud, refer sections 19.0, 19.1 and 19.2 of the "FFA Governance Policy 2016". "2011 FFA Regulation 30 (1) (f)" regard stealing or misappropriation of funds as an offence and a staff may be summarily dismissed if found guilty (FFA Reg 30 (2)). Section 17.0 of the "FFA Governance Policy 2016" deals with how Conflict of Interest can be avoided and 18.0 how gifts should be managed.
1.10 Has the IP advised employees, beneficiaries and other recipients to whom they should report if they suspect fraud, waste or misuse of agency resources or property? If so, does the IP have a policy against retaliation relating to such reporting?	Yes			Low	1	Under section 19.2 of the "FFA Governance Policy 2016", any suspected fraud should be reported to the Director General. "FFA 2011 Staff Regulation 30(3)" stipulates how it should be dealt with. Also, section 20.0 of the Governance Policy outlines the process for a whistleblower. The Governance Policy is available on the FFA intranet for staff access. An update on the Policy was issued to all staff on 20/12/16, refer FFA Policy Update Number 06/2016.
1.11 Does the IP have any key financial or operational risks that are not covered by this questionnaire? If so, please describe. Examples: foreign exchange risk; cash receipts.	Yes			Moderate	2	The IP sustains some foreign exchange risk, noting that its operating currency is USD whereas significant inflows in AUD, NZD, Euro and Yen can and do occur on an annual basis. The Audit Committee record of AC11 from October 2016 shows that the AC noted the action of the Secretariat in engaging a foreign currency expert consultant and i. noted the comprehensive and detailed report produced by the consultant which provides a sound foundation for FFA foreign exchange practices and procedures going forward. ii. noted that the most important actions identified in the Report have been implemented in practice by the FFA which will reduce the risk of future foreign exchange losses.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						The "FFA Financial Regulations" were concurrently amended by approval of the FFC in November 2016 to include Regulation 18 that notes " Any investments in USD shall be made to optimize interest earnings while addressing any known risks and accounting for the operational requirements of the agency. (c) Any investments in non-USD will be done with regard to any prevailing foreign currency exchange policies approved by the Director for General and/or the Committee, including in respect of currency hedging strategies, and will otherwise minimize the risk of long-term exposure to changing market conditions. Hedging strategies remain under active assessment but have been constrained by the local banking environment and by the nature of donor fund receipts. There have been no net losses on forex since the implementation of the approved strategies in 2016. Also, other IP operational risks are recorded in the FFA enterprise risk register maintained by the Internal Auditor for controls assurance purposes.
Total number of questions in subject area:	11					
Total number of applicable questions in subject area:	11					
Total number of applicable key questions in subject area:	5					
Total number of risk points:	15					
Risk score	1.364					
Area risk rating	Low					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
2. Programme Management						
2.1 Does the IP have and use sufficiently detailed written policies, procedures and other tools (e.g. project development checklist, work planning templates, work planning schedule) to develop programmes and plans?	Yes			Low	1	There is a well-established system for the development of the Annual Work Programme and Budget (AWBP) for each Division in the agency and for each major project. The acquisition of the Finance One FMS has assisted this process. A detailed Budget Guideline is issued each December articulating requirements for the development of the AWPB. The AWPB represented to costing out of the Statement of Intent which is a critical part of the IP's overall annual Monitoring and Evaluation ("M and E") Framework, reflecting also the FFA's Strategic Plan 2014-2020 which is currently undergoing a major review by the Membership.
2.2 Do work plans specify expected results and the activities to be carried out to achieve results, with a time frame and budget for the activities?	Yes			Moderate	4	Most FFA donor agreements have very specific results frameworks and timelines. There are targets and outputs in Divisional Work Plans, The Statement of Intent and in the AWPB that need to be reported against. The annual Traffic Light report each November is another key M and E process. As projects are often demand driven, work plans need to be sufficiently flexible to take account of changing circumstance.
2.3 Does the IP identify the potential risks for programme delivery and mechanisms to mitigate them?	Yes			Low	1	There is a risk assessment and analysis built into work program development and this includes risk mitigation. All major projects have risk frameworks that are reviewed annually. The IP maintains an automated Risk Register.
2.4 Does the IP have and use sufficiently detailed policies, procedures, guidelines and other tools (checklists, templates) for monitoring and evaluation?	Yes			Low	1	Yes, Monitoring and Evaluation ("M and E") Frameworks are built into all donor projects and assessed within dedicated Steering Groups. Overarching M and E activity is carried out in line with the agreed M and E processes governing all Agency work (see aslo2.1 and 2.2). This may be revised once the adoption of the 2020 Strategic Plan is finalized.
2.5 Does the IP have M&E frameworks for its programmes, with indicators, baselines, and targets to monitor achievement of programme results?	Yes			Moderate	2	Yes, Monitoring and Evaluation ("M and E") Frameworks are built into all donor projects and assessed within dedicated Steering Groups. Overarching M and E activity is carried out in line with the agreed M and E processes governing all Agency work (see aslo2.1 and 2.2).

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
2.6 Does the IP carry out and document regular monitoring activities such as review meetings, on-site project visits, etc.	Yes			Moderate	4	As part of its M and E framework, each Division and work unit in the FFA Secretariat has a Divisional Work Plan which is updated annually. These underpin the identified Key result areas (KRAs) and set the framework for individual staff performance. As in past years, Statement of Intent 11 (SOI 11) therefore also highlights the major focus areas for the coming year within each Division. Members and development partners also require clarity on the expected impact of the services the Secretariat delivers. In that sense, the SOI is a key component within the broader FFA Monitoring and Evaluation Framework, including the Director General's Annual Report in July and the FFA Traffic Light Report in October - combined with the many individual donor and programme reports undertaken as part of our annual business cycle. Members are involved actively in many of these consultation processes through the various programme and activity Steering Committees set up for that purpose.
2.7 Does the IP systematically collect, monitor and evaluate data on the achievement of project results?	Yes			Low	1	Yes - Results monitored and reported as specified in project agreements - i.e. - for UNDP - quarterly and for FAO - six monthly. As discussed, the IP also has an overarching fit-for-purpose M and E.
2.8 Is it evident that the IP followed up on independent evaluation recommendations?	Yes			Moderate	2	Projects respond to all reviews and address any matters arising. An Independent Assessment of the IP was carried out in 2017 and the follow-up reported annually to the Governing FFC. OFMP 2 MTR completed and reported against to Project Steering Committee.
Total number of questions in subject area:	8					
Total number of applicable questions in subject area:	8					
Total number of applicable key questions in subject area:	2					
Total number of risk points:	16					
Risk score	2					
Area risk rating	Moderate					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
3. Organizational Structure and Staffing						
3.1 Are the IP's recruitment, employment and personnel practices clearly defined and followed, and do they embrace transparency and competition?	Yes			Low	1	The IP's Staff Regulation part iv and v defines its recruitment, employment and personnel practices. Regulation 13 (1) under PART IV, for instance, embrace transparency and competition as it requires all vacant positions within the IP establishment to be advertised in all member countries and territory for professional staff, and in the Solomon Islands for support staff, this requirement is followed. Entitlements on appointment and termination are outlined under PART V of the IP Staff Regulation. Terms and Conditions of appointment are specified in staff's employment contracts. Also, documented personnel practices are available on the intranet for e.g. Salary Advancement Policy, Gender Equity Framework, Public Holiday Policy, Updated DSA rates, Travel Policy, FFA Domestic and Family Violence Policy.
3.2 Does the IP have clearly defined job descriptions?	Yes			Low	1	The IP's HR unit manages all Terms of reference for each position, and all ToRs are routinely updated including in advance of advertisement where they must be agreed at Senior level.
3.3 Is the organizational structure of the finance and programme management departments, and competency of staff, appropriate for the complexity of the IP and the scale of activities? Identify the key staff, including job titles, responsibilities, educational backgrounds and professional experience.	Yes			Moderate	4	<p>(i) <u>Perry Head</u> - <u>Job Title: Director of Corporate Services</u>, <u>Responsibilities:</u> Overall Budgetary, HR and Strategic management, <u>Educational Background:</u> Master of Business Administration, <u>Professional Experience:</u> 3.5 years at FFA and 30 years prior experience in DFAT and AusAID (Australia) in a variety of diplomatic, management and aid-delivery roles.</p> <p>(ii) <u>Maletino Teofilo</u> - <u>Job Title: Manager Finance</u> <u>Responsibilities:</u> Direct management, supervision and control of FFA's financial management and reporting; <u>Educational Background:</u> MBA, Postgraduate Cert & Diploma -Auckland University; Accounting at Samoa National University; Member of the Samoan Institute of Accountant and working towards Australia CPA; <u>Professional Experience:</u> Financial and Management Accounting 10 years experience with FFA and 9 years experience with the Samoan Government.</p> <p>(iii) <u>Rodney Rutepitu</u> - <u>Job Title: Management Accountant</u>; <u>Responsibilities:</u> Control and supervision</p>

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						<p>of FFA internal management reporting, budgeting and payments; <u>Educational Background</u>: Master of Commerce; Macquarie University, Sydney (April 2002) Bachelor of Arts; USP, Fiji (July 1991); <u>Professional Experience</u>: Management Accountant at FFA, for the last 11 years. 1992 - September 2006 - Central Bank of Solomon Islands, research officer for the non-formal financial sector, Accountant, Manager of Finance & Accounts, Manager Finance and IT.</p> <p>(iv) Kauka Havea - Job title: Financial Accountant, Responsibilities: Control and supervision of external financial reporting. Educational Background: Bachelors of Commerce, CPA UPNG Society of Accountants. Professional experience: 2 years 9 months as Analyst and Senior Analyst with Deloitte, 7 years Financial Accountant with FFA.</p> <p>(v) Keva Robarobalevu - Job Title: Internal Auditor, Responsibilities: Support management in the monitoring and continuous improvement of the IP's Controls, Risk Management and Governance, Educational Background: Post Grad. Diploma in Governance, Bachelors Degree in Accounting & Financial Management and Information Systems, Professional Experience: 14 years internal audit and 12 years external audit.</p> <p>(vi) Hugh Walton - Job Title: Chief Technical Adviser OFMP2, Responsibilities: Overall management and coordination of OFMP2 Educational Background: BA degree in Sociology, Coastal Fishing Vessel Master Professional Experience: 40 years of experience in Pacific Fisheries and more than 20 years in donor funded Fisheries Project Management roles.</p> <p>(vii) Sireta Laore - Job Title: Finance and Administrative Assistant Responsibilities: Payments and reconciliation and financial record keeping for all project transactions Educational Background: Bachelor of Business Analysis - Accounting (2014)</p>

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						University of Waikato Professional Experience: 6 years experience in financial reporting and accounting including previous roles as financial administrator and assistant accountant.
3.4 Is the IP's accounting/finance function staffed adequately to ensure sufficient controls are in place to manage agency funds?	Yes			Significant	6	IP employs three senior CPA accountants working to the Director Corporate Services. 11 other Finance Officers and a Payroll Officer are engaged in a variety of relevant roles. These roles conform with the principles embodied in the "FFA Financial Regulations (2016)" and as set out in the "FFA Corporate Governance Policy 2016", and the "FFA Financial Procedures Manual 2019", which are all available on the FFA Intranet. In addition, the work of the Internal Auditor provides independent oversight and checking of key IP Controls in an approved schedule of audit verification. The internal control function however, is not adequately staffed as there is only one internal auditor. As a result, planned audits are performed over 2 to 3 years and not at a shorter frequency to ensure gaps are identified and mitigated in a timely manner.
3.5 Does the IP have training policies for accounting/finance/ programme management staff? Are necessary training activities undertaken?	Yes			Moderate	2	The three senior FFA accounting staff receive provision to maintain CPA certifications through participation in overseas colloquia. In addition, extensive training to all staff on the operation of the Finance1 Financial Management System and the implementation of IPSAS are done through annual budgetary provisions dedicated to training. The Payroll Officer has likewise attended recent relevant Sage Payroll system training. Internal Auditor attends the annual South Pacific and Asia Internal Auditors Conference (SOPAC) organised by the Institute of Internal Auditors, Australia.
3.6 Does the IP perform background verification/checks on all new accounting/finance and management positions?	Yes			Moderate	2	Yes, reference checks are carried out as part of the recruitment process. Likewise, within Tender processes, checks on Financial capacity and probity are routinely conducted where there is any risk to the Agency.
3.7 Has there been significant turnover in key finance positions the past five years? If so, has the rate improved or worsened and appears to be a problem?		No		Low	1	The current Director Corporate Services was appointed in January 2016. The Finance Manager, Management Accountant and Financial Accountant have all served for greater than 5 years. There has not been any significant turnover in key finance positions in the past 5 years.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
3.8 Does the IP have a documented internal control framework? Is this framework distributed and made available to staff and updated periodically? If so, please describe.	Yes			Moderate	2	The Internal Controls system is clearly set out within the "FFA Financial Regulations (2016)" and within the "FFA Corporate Governance Policy 2016", and the "FFA Financial Procedures Manual 2019", which are all available at all times on the FFA Intranet, to be accessed by II staff.
Total number of questions in subject area:	8					
Total number of applicable questions in subject area:	8					
Total number of applicable key questions in subject area:	3					
Total number of risk points:	19					
Risk score	2.375					
Area risk rating	Moderate					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
4. Accounting Policies and Procedures						
4a. General						
4.1 Does the IP have an accounting system that allows for proper recording of financial transactions from United Nations agencies, including allocation of expenditures in accordance with the respective components, disbursement categories and sources of funds?	Yes			Low	1	The IP has invested heavily in its Financial Management System, Finance One. The IP's financial transaction for UNDP funded programme can be easily identified in the general ledger under the Fund Code "T" and its subsidiary ledgers and budgets are in accordance with the respective component and disbursement categories. Funds received are credited into a bank account opened for this purpose and disbursements made from the same.
4.2 Does the IP have an appropriate cost allocation methodology that ensures accurate cost allocations to the various funding sources in accordance with established agreements?	Yes			Low	1	Costs are allocated under the respective funding, for instance costs for the OFMP UNDP/GEF funded programme are allocated and charged under this programme. The cost components under this programme are in accordance with the signed agreement.
4.3 Are all accounting and supporting documents retained in an organized system that allows authorized users easy access?	Yes			Low	1	Original Payment Advice (PA) and relevant supporting documents are filed in sequence of reference numbers. Scanned copies with supporting documents are also filed in sequence on "X" drive. Financial reports can easily be generated from the IPs accounting system.
4.4 Are the general ledger and subsidiary ledgers reconciled at least monthly? Are explanations provided for significant reconciling items?	Yes			Low	1	Finance officers reconcile monthly the general ledger and the subsidiary ledgers of the Funds they look after and a report of the reconciliation is submitted to the Financial Accountant who checks and submit it to the Manager Finance for approval.
4b. Segregation of duties						
4.5 Are the following functional responsibilities performed by different units or individuals: (a) authorization to execute a transaction; (b) recording of the transaction; and (c) custody of assets involved in the transaction?	Yes			Low	1	The Director of the procuring division or department authorize the execution of a transaction and Finance Officers records the transaction and asset. The procuring department or division is the custodian of the asset. The Finance Asset Officer maintains a Register of all FFA Assets in the Finance One system.
4.6 Are the functions of ordering, receiving, accounting for and paying for goods and services appropriately segregated?	Yes			Low	1	All key components are segregated. IP division or department initiates procurement via the 'Expense Requisition Form'. This triggers the corporate services division (CSD) administration department (Admin) to produce a 'Purchase Order' via the 'Finance One' (F1)

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						system. CSD Admin receives and record items in F1. CSD finance department is responsible for the accounting and payment of assets and services received.
4.7 Are bank reconciliations prepared by individuals other than those who make or approve payments?	Yes			Moderate	4	Programme Finance Officers who prepare bank reconciliations may also prepare payment vouchers. However, the Division Director, Fund Manager and the Manager Financer authorize payment. Note also that the Financial Accountant checks the accuracy and completeness of the bank reconciliations and the Manager Finance also checks and approves.
4c. Budgeting system						
4.8 Are budgets prepared for all activities in sufficient detail to provide a meaningful tool for monitoring subsequent performance?	Yes			Low	1	Budgets are separated into divisions and programmes/activities. Descriptive Expenditure or Income Accounts are provided under each Programme/Activity. Variances are regularly identified and discussed within weekly and monthly Financial reporting distributed to all managers.
4.9 Are actual expenditures compared to the budget with reasonable frequency? Are explanations required for significant variations from the budget?	Yes			Low	1	Manager Finance and DCS circulate to Directors and Managers weekly and monthly Finance Report showing actual versus budget. The purpose is for Directors and Managers to gauge performance against budget and take necessary action where required. A separate variance table is included in this process.
4.10 Is prior approval sought for budget amendments in a timely way?	Yes			Moderate	2	IP's revised/supplementary budget is tabled with the FFC Audit Committee and the FFC in its meeting held in May and/or October every year. There is also a thorough process if adjustment of Budgets is required during the year.
4.11 Are IP budgets approved formally at an appropriate level?	Yes			Low	1	Divisional IP budgets are endorsed by the Division Directors, DDG and by DG. The overall budget is subsequently tabled with the FFC Audit Committee for review and with the FFC for approval.
4d. Payments						
4.12 Do invoice processing procedures provide for: - Copies of purchase orders and receiving reports to be obtained directly from issuing departments?	Yes			Low	1	Under section 8.2 of the 'Financial Procedures Manual 2019', issuing or purchasing division details the goods, services or works requested in the 'Expense Requisition Form' (ERF), once authorised, Corporate Services division (CSD) procurement team issue a Purchase Order (PO) via the Finance One (F1) system, the relevant reference number of the PO is quoted on the ERF. The CSD procurement team

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
<ul style="list-style-type: none"> - Comparison of invoice quantities, prices and terms with those indicated on the purchase order and with records of goods/services actually received? - Checking the accuracy of calculations? 						check to ensure all goods and quantity are well received and in good condition. Once the goods are received or services provided, the CSD finance officer prepares the payment voucher and attach the relevant ERF for payment. The Finance Officer responsible for the financial administration of the project and the senior Finance Officer Authorising the payment, signs on the Payment Voucher to certify that ".....the payment is for goods and services received by the Agency and that it is in order for payment.....".
4.13 Are payments authorized at an appropriate level? Does the IP have a table of payment approval thresholds?	Yes			Low	1	'Financial Procedures Manual 2019 Annex IV: FFA AUTHORITY SCHEDULES AS AT 1 JANUARY 2019' sets the table of approval thresholds.
4.14 Are all invoices stamped 'PAID', approved, and marked with the project code and account code?	Yes			Moderate	4	The invoice reference number is quoted on the relevant Payment Advice to the bank. It is also quoted on the relevant Payment Voucher together with the relevant Account Code and Description. The requesting division also indicate the relevant project Code in the "Expense Requisition Form".
4.15 Do controls exist for preparation and approval of payroll expenditures? Are payroll changes properly authorized?	Yes			Low	1	Personnel Services Officer (PSO) prepares the fortnightly payroll. The PSO can only make changes to payroll if it is supported by a HR15 Form received from the HR Assistant and authorised by the Manager HR. Documents to support the change is attached to the HR15 Form which is attached to the payroll, this is re-checked by the Assistant Finance Officer before it is submitted to the Manager HR who re-checks and authorises release payroll details to Manager Finance for payment. Manager Finance also re-checks the payroll for accuracy before authorizing payment.
4.16 Do controls exist to ensure that direct staff salary costs reflects the actual amount of staff time spent on a project?	Yes			Moderate	4	Staff are expected to work 7.5 hrs a day. i.e. 37.5 hrs/week. Most staff undertake regular duty travel and routinely work more than the expected hours. All staff have a Performance Agreement in place with their supervisor which governs the expectations of their annual work and identifies their KPIs, flowing from their Divisional Work Plan and the Statement of Intent. This includes a biannual review of performance that can identify gaps and issues if they arise.
4.17 Do controls exist for expense categories that do not originate from invoice payments, such as	Yes			Low	1	Requisitions for such expenses are raised by the requesting division and signed approved by the division Manager or Director depending on the approval limit. The Excel Travel Requisition Form for instance require travel details to be

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
DSAs, travel, and internal cost allocations?						entered for approval e.g. destination, estimated departure date and arrival date, purpose of travel, work schedule and expected outcomes should be indicated. The formula for DSA calculation, based on the approved rate, is locked in, enhancing accuracy. The applicable airfare is also indicated on the same Requisition. After Travel, any adjustments are submitted and cost-allocated as required.
4e. Policies and procedures						
4.18 Does the IP have a stated basis of accounting (i.e. cash or accrual) and does it allow for compliance with the agency's requirement?	Yes			Low	1	The IP adopts accrual basis of accounting based on the International Public Accounting Standard (IPSAS) and it allows for compliance with agency requirements.
4.19 Does the IP have an adequate policies and procedures manual and is it distributed to relevant staff?	Yes			Low	1	IP has a "Financial Procedures Manual 2019" which adequately covers all aspects of its financial management and is available on the FFA intranet for all staff to access.
4f. Cash and bank						
4.20 Does the IP require dual signatories / authorization for bank transactions? Are new signatories approved at an appropriate level and timely updates made when signatories depart?	Yes			Low	1	Depending on the amount of the transaction any two of the following will sign to authorise bank transactions: Management Accountant up to USD100,000; Financial Accountant up to USD100,000; Manager Finance up to USD200,000; Director CSD up to USD500,000, Deputy Director General and Director General up to the amounts approved in the Annual work Program and Budget. The Manager Finance advises the relevant banks in advance of the date signatories are to depart and new ones to be added.
4.21 Does the IP maintain an adequate, up-to-date cashbook, recording receipts and payments?	Yes			Moderate	4	Cash book for receipts and expenditure is maintained up to date in the IP's Finance One system and is reconciled monthly with the cash at bank balance as per the bank statements.
4.22 If the partner is participating in micro-finance advances, do controls exist for the collection, timely deposit and recording of receipts at each collection location?			N/A	N/A	-	Not applicable as IP does not participate in micro-finance advances.
4.23 Are bank balances and cash ledger reconciled monthly and properly approved? Are explanations provided for significant, unusual and aged reconciling items?	Yes			Low	1	Finance Officers reconcile bank balances as per the bank statement with bank balances as per the ledger, explanations for unreconciled items are explained in the bank reconciliation report which is checked and signed

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						approved by the Financial Accountant and the Manager Finance.
4.24 Is substantial expenditure paid in cash? If so, does the IP have adequate controls over cash payments?		No		Low	1	Amounts paid in cash is generally small, maximum per transaction would be SBD500 via petty cash. Substantial expenditures are via Payment Advice to the banks to send via telegraphic transfer.
4.25 Does the IP carry out a regular petty cash reconciliation?	Yes			Moderate	2	Petty cash held is only SBD5,000 and reconciliation is carried out monthly.
4.26 Are cash and cheques maintained in a secure location with restricted access? Are bank accounts protected with appropriate remote access controls?	Yes			Low	1	Cash and cheques are secured in locked cabinets. Bank accounts ANZ are accessed through the 'ANZ Transactive' where bank officers transfer payments to overseas accounts from within the office based on the 'dual key' electronic generation system which is based on the international standard. Daily bank statements are received from ANZ Solomon Islands.
4.27 Are there adequate controls over submission of electronic payment files that ensure no unauthorized amendments once payments are approved and files are transmitted over secure/encrypted networks?	Yes			Moderate	2	Bank reconciliations will detect any unauthorized amendments made after approval. There is a clear process to follow and segregation of duties is included in the process to detect fraud or any unauthorised amendment.
4g. Other officers and entities						
4.28 Does the IP have a process to ensure expenditures of subsidiary offices/ external entities are in compliance with the work plan and/or contractual agreement?		No		Moderate	4	No, the IP does not have subsidiary offices/external entities. However, for cases of third parties where funds are paid to external entities, the Director and Project Team Leaders are responsible for ensuring compliance with the agreed work plan and/or contractual agreements are monitored and fully implemented. Reconciliations and Monitoring and Evaluation are undertaken as part of the Funding Agreement. Monitoring and evaluation activities are specifically designed in each MOU and these are managed and monitored by the Coordinator in charge of each activity. Agreements are finalized through FFA's legal department.
4h. Internal audit						

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
4.29 Is the internal auditor sufficiently independent to make critical assessments? To whom does the internal auditor report?	Yes			Low	1	Internal Auditor reports functionally to the Director General and the Audit Committee and administratively to the Deputy Director General therefore sufficiently independent to make critical assessment.
4.30 Does the IP have stated qualifications and experience requirements for internal audit department staff?	Yes			Low	1	The IP requires the Internal Auditor to essentially possess tertiary qualifications in Commerce/Accounting, Corporate Governance or a relevant field and to be a fully accredited CPA, CA or CMA. 5 to 10 years suitable/relevant experience in Audit, Risk and Compliance is preferred. Also required are experience and skill in devising and managing audit and strategies in alignment with strategic and financial business objectives, experience in management and governance regulatory systems and procedures and proven experience in setting priorities, and determining resource requirements, short or long-term goals and strategies to achieve them.
4.31 Are the activities financed by the agencies included in the internal audit department's work programme?	Yes			Moderate	2	The IP Internal Auditor produces a risk based 3 years/annual work program which is revised annually. The program is focused on the continuous monitoring of Controls that impact on the achievement of activity objectives financed by donors.
4.32 Does the IP act on the internal auditor's recommendations?	Yes			Moderate	2	The IP will assess the IP recommendations and act accordingly. The internal auditor monitors and reports on implementation of recommendations through regular processes and any recommended action which may be outstanding is further highlighted for management attention.
Total number of questions in subject area:	32					
Total number of applicable questions in subject area:	31					
Total number of applicable key questions in subject area:	19					
Total number of risk points:	51					
Risk score	1.64516129					
Area risk rating	Low					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
5. Fixed Assets and Inventory						
5a. Safeguards over assets						
5.1 Is there a system of adequate safeguards to protect assets from fraud, waste and abuse?	Yes			Moderate	2	The IP's Finance department maintains the Asset Register. Serial number or a tagged asset ID # is recorded together with other details of the asset. An asset is recognised in the accounting system if the value is higher than USD1,000, economic benefits will flow to FFA and cost or fair value can be reliably measured (refer Financial Procedures Manual 2019 section 12.2). Portable and attractive items valued less than USD1,000 is recorded in the Portable and Attractive Items Register. Annual stocktake is done by 2 officers nominated by the Director Corporate Services (DCS). A signed stocktake report is submitted to the DCS. Assets are only disposed if its approved by the DG or by a person with authority to do so, as listed in the Delegations Schedule. Disposal can be through public auction, tender, in-house tender, direct sale, trade-in, transfer to another agency or charity on DG's written approval or scrap. Property, land or land with improvements is disposed of only by the Director General in line with "FFA Financial Regulation 2", through a real estate agent or direct sale.
5.2 Are subsidiary records of fixed assets and inventory kept up to date and reconciled with control accounts?	Yes			Low	1	Subsidiary records of fixed assets are maintained up to date and reconciled with control accounts.
5.3 Are there periodic physical verification and/or count of fixed assets and inventory? If so, please describe?	Yes			Low	1	Annual fixed asset verification ensures existence against what is recorded in the Asset Register. This verification is performed by 2 stocktake officers nominated by the Director Corporate Services (DCS). A signed stocktake report detailing deficits or surpluses, recommendations for disposal etc. is submitted to the DCS for further action.
5.4 Are fixed assets and inventory adequately covered by insurance policies?	Yes			Low	1	Damages to buildings and its contents are insured against fire, cyclones and earthquakes.
5b. Warehousing and inventory management						

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
5.5 Do warehouse facilities have adequate physical security?			N/A	N/A	-	Not applicable, IP does not have a warehouse facility.
5.6 Is inventory stored so that it is identifiable, protected from damage, and countable?			N/A	N/A	-	Inventory is securely stored by the purchasing division or department and can be physically verified and countable. For instance, the IT department keeps proper and secure storage of IT equipment, computers, drivers and accessories.
5.7 Does the IP have an inventory management system that enables monitoring of supply distribution?			N/A	N/A	-	Not applicable, IP is not involved in manufacturing or trading for it to have an inventory management of stock. There are however small inventory items such as office stationeries and office supplies controlled by the Corporate Services Division Administration department.
5.8 Is responsibility for receiving and issuing inventory segregated from that for updating the inventory records?			N/A	N/A	-	As in 5.7
5.9 Are regular physical counts of inventory carried out?			N/A	N/A	-	The entity does not hold any inventory items but rather consumables. These are normally expensed when issued for use. Regular counts are conducted for Fixed assets.
Total number of questions in subject area:	9					
Total number of applicable questions in subject area:	4					
Total number of applicable key questions in subject area:	0					
Total number of risk points:	5					
Risk score	1.25					
Area risk rating	Low					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
6. Financial Reporting and Monitoring						
6.1 Does the IP have established financial reporting procedures that specify what reports are to be prepared, the source system for key reports, the frequency of preparation, what they are to contain and how they are to be used?	Yes			Low	1	In accordance with the IP's ' Financial Procedures Manual 2019 14.2', the Management Accountant circulates a weekly financial report to the executive, directors and managers and at the end of each month the Management Accountant loads the actual and budget figures for each project in the centrally accessed internal drive for directors and managers. The Manager Finance will also provide a monthly financial report once cleared by the Director Corporate Services. The purpose of the reports is to enhance quality control and eliminate misreporting, timely warning of overspends and underspends at the activity level and timely information on key financial information to the executive management.
6.2 Does the IP prepare overall financial statements?	Yes			Low	1	IP is required under its Financial Regulation to prepare an annual financial statement of its financial position and performance which is audited by an external independent accounting firm and presented to the governing body, the Forum Fisheries Committee via its Audit Sub-committee.
6.3 Are the IP's overall financial statements audited regularly by an independent auditor in accordance with appropriate national or international auditing standards? If so, please describe the auditor.	Yes			Low	1	The IP's financial statements is audited annually before it is presented to its governing body. The audit is conducted by a reputable accounting firm in accordance with International Auditing Standards. The reputable accounting firm may be one of the big 4 accounting firms - Price Waterhouse Coopers, KPMG, Ernst & Young or Deloitte. The appointment of the accounting firm as the external auditor is 2 years with a possible extension of another 2 years, after which it is advertised. The immediate past external Auditor is Ernst and Young Fiji.
6.4 Were there any major issues related to ineligible expenditure involving donor funds reported in the audit reports of the IP over the past three years?	Yes			Moderate	4	In the last 3 years, from 2015 to 2018, there were no major issues on ineligible expenditure involving donor funds reported by auditors. There was however in the years prior to 2015, an EU-commissioned report of a significant amount of possible ineligible expenditure under the former EU funded DEV FISH2 project. This related to record-keeping of documents some of which were beyond 7 years in age. A significant portion has been clarified and resolved but there is still a disputable amount that is currently under discussion. This is a region-wide issue impacting a number of regional IPs. The matter has been elevated to the political

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						level and was raised by Pacific ACP leaders with the EU as recently as March 2019. A response for the EU is pending.
6.5 Have any significant recommendations made by auditors in the prior five audit reports and/or management letters over the past five years and have not yet been implemented?		No		Moderate	2	The IP considered all recommendations by auditors a priority and has taken action to address all matters raised in the prior five audit reports and management letters. No recommendations by auditors in this period have impacted the unqualified assessment of the IP.
6.6 Is the financial management system computerized?	Yes			Low	1	The IP's financial management system is computerized, the "Finance One" system is used for this purpose (Technology One - https://www.technologyonecorp.com).
6.7 Can the computerized financial management system produce the necessary financial reports?	Yes			Low	1	The "Finance One" system produces all the necessary financial reports except for some projects such as OFMPII UNDP/FAO funded, PROP World Bank funded etc., annual financial reports of which is formatted and presented using Excel.
6.8 Does the IP have appropriate safeguards to ensure the confidentiality, integrity and availability of the financial data? E.g. password access controls; regular data back-up.	Yes			Low	1	Access to financial information is controlled through access levels controlled by the Management Accountant who is the Administrator of the system. Data is backed up daily and tested periodically for recoverability by the ICT department. Each user is assigned a unique password based on their assigned access level.
Total number of questions in subject area:	8					
Total number of applicable questions in subject area:	8					
Total number of applicable key questions in subject area:	3					
Total number of risk points:	12					
Risk score	1.5					
Area risk rating	Low					

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
7. Procurement and Contract Administration						
7.1 Does the IP have written procurement policies and procedures?	Yes			Low	1	The IP's written procurement policies and procedures are in sections 6,7 and 8 of the "Financial Procedures Manual 2019".
7.2 Are exceptions to procurement procedures approved by management and documented?	Yes			Low	1	Section 6.5 of the "Financial Procedures Manual 2019" sets the procedures to be followed for exceptions. A Non-competitive Procurement Form with the requisition is submitted to the Director General for approval and in the case of consultancy, the Consultancy Identification Form is also completed and submitted. Justification for the exception has to be explained in detail in the Non-Competitive Procurement Form.
7.3 Does the IP have a computerized procurement system with adequate access controls and segregation of duties between entering purchase orders, approval and receipting of goods? Provide a description of the procurement system.	Yes			Moderate	2	The procurement system is a mixture of manual and application procedures. A request for procurement is initiated via the "Expense Requisition Form" (ERF) on MS Excel and available on the FFA intranet. The Form contains the name of the supplier, purchase order no., division requesting, requisition number, banking details if overseas supplier or consultant, payment type, payment method, quantity, description of items/service, cost, currency, conversion if cost currency is not in USD, project name, project code, total budget \$, available \$, remarks on quote details e.g. tender info, split codes etc., signed requested by, signed authorized by Director or Manager and signed authorization by JPF/PDF Fund Manager (as required). Details of the intended procurement is entered in the ERF by the requesting officer, the Division Director will authorise before it is forwarded to the Finance staff for confirmation of availability of budget. Set up of new vendors within the Finance One (F1) system is triggered by the approved ERF. The Management Accountant is responsible for the setup of new vendor. Issue of Purchase Order (PO) in the F1 system is also triggered by the approved ERF. Staff in the Corporate Services Division (CSD) procurement team is responsible for the issue of PO and entering the relevant PO number on the ERF. Creation of the PO in F1 triggers a commitment. The CSD procurement team is also responsible for ensuring that all goods and quantity are received well and in good condition, including where prepayments occurred and ensure that it is recorded in F1.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
7.4 Are procurement reports generated and reviewed regularly? Describe reports generated, frequency and review & approvers.	Yes			Moderate	2	The Corporate Services Division's Finance department generates a monthly Purchase Order (PO) Report from the Finance One system and distribute them to Fund Managers to match PO against items and services received and invoices paid. Purpose is to identify outstanding items or services yet to be received or already paid but yet to be received and take necessary action.
7.5 Does the IP have a structured procurement unit with defined reporting lines that foster efficiency and accountability?	Yes			Low	1	The IP has a procurement team made up of 2 officers who also manage the IP's buildings (staff houses and office premises) and assist in HR matters. These officers report to the Manager responsible for Planning & Performance Management, HR and Administration. The department is part of the Corporate Services division. The procurement team are accountable to the Manager and at times guided by the Director Corporate Services for matters relating to procurement, especially in respect of records management.
7.6 Is the IP's procurement unit resourced with qualified staff who are trained and certified and considered experts in procurement and conversant with UN / World Bank / European Union procurement requirements in addition to the IP's procurement rules and regulations?	Yes			Moderate	2	The IP's procurement policies and procedures is generally based on the UN/WB/EU procurement requirements. The procurement team is under the guidance and direction of the Director Corporate Services who is well versed with donor's procurement guidelines. Procurement staff are not formally trained but rather perform their duties based on the procurement policy, which has been designed to be in line with UN/WB and EU requirements.
7.7 Have any significant recommendations related to procurement made by auditors in the prior five audit reports and/or management letters over the past five years and have not yet been implemented?	Yes			Moderate	2	Significant recommendation raised by auditors in the past five years have been implemented. This relate to publicly tendering two services, costs of which are significant. All items and services that cost more than USD20,000 are now procured via competitive public tendering unless the DG has approved exceptions.
7.8 Does the IP require written or system authorizations for purchases? If so, evaluate if the authorization thresholds are appropriate?	Yes			Low	1	Written authorization is required via the "Expense Requisition Form", refer comments in 7.3. Authorization thresholds is tabulated as an Annex to the "Financial Procedures Manual 2019". Authorisation thresholds are deemed appropriate.
7.9 Do the procurement procedures and templates of contracts integrate references to ethical procurement	Yes			Low	1	Section 6.1 of the "Financial Procedures Manual 2019" sets the IP's Procurement Principles - ethical decision making, value for money, appropriate competition and proper recording. For procurement valued at USD3,000 or less,

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
principles and exclusion and ineligibility criteria?						'shopping' method is employed directly by a person with sufficient procurement delegation, no quotation or tender required. Procurement valued between USD3,001 and USD20,000, 3 competitive written quotes is obtained and over USD20,000 public tender is required. Tender is advertised widely via social media, national newspapers and approved tender websites. The tender 'Request for Proposal' template transparently informs bidders the specification of the tender and details on how to obtain additional information, how information should be presented, evidence required to verify financial and economic capacity, professional and technical capacity, the criteria and weightings by which responses will be evaluated, date and time tenders to be received, how it should be marked and addressed and information about how successful and unsuccessful tenders will be notified. Tender Registers lists all tenders received via the tender box, ordinary mail, fax or emails. Receipt and recording are done by officers independent of the procurement team and tender evaluation panel. Before tenders are evaluated, names of the tenderers will be announced by the Chair of the tender panel and members requested to advise if they have a real or potential conflict of interest, this is indicated in the Minutes of the panel meeting. Each tender panel member input their scores for each criteria in a score sheet which will be averaged to determine the total score of each bidder. 'Technical Evaluation' is done first and any bid with less than the minimum assigned score will be considered non-responsive and excluded from the 'Financial Evaluation'. Tender Evaluation Report includes list of tenders received, members of the tender panel, advice on whether any members of the tender panel has a conflict and if so, how was it managed, clarifications, complaints and resolution (if any), evaluation and the recommended winning Tender. The report is submitted to the Director General who will sign approved if he or she agrees with the panel's recommendation.
7.10 Does the IP obtain sufficient approvals before signing a contract?	Yes			Low	1	A contract is only signed by the Director-General, the Acting Director General or when essential by the Officer in Charge in the absence of the DG/DDG. Where needed, the IP's legal department provides advice before signing.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
7.11 Does the IP have and apply formal guidelines and procedures to assist in identifying, monitoring and dealing with potential conflicts of interest with potential suppliers/procurement agents? If so, how does the IP proceed in cases of conflict of interest?	Yes			Low	1	Section 7.5.3.4 of the "Financial Procedures Manual 2019" require the tender panel to declare any real or potential conflict of interest. Guidelines on Conflicts of Interest is provided under section 3.3 of the "Financial Procedures Manual 2019".
7.12 Does the IP follow a well-defined process for sourcing suppliers? Do formal procurement methods include wide broadcasting of procurement opportunities?	Yes			Moderate	4	Section 6.1 of the "Financial Procedures Manual 2019" sets the IP's Procurement Principles - ethical decision making, value for money, appropriate competition and proper recording. For procurement valued at USD3,000 or less, 'shopping' method is employed directly by a person with sufficient procurement delegation, no quotation or tender required. Procurement valued between USD3,001 and USD20,000, 3 competitive written quotes is obtained and over USD20,000 public tender is required. Tender is advertised widely via social media, national newspapers and approved tender websites. The tender 'Request for Proposal' template transparently informs bidders the specification of the tender and details on how to obtain additional information, how information should be presented, evidence required to verify financial and economic capacity, professional and technical capacity, the criteria and weightings by which responses will be evaluated, date and time tenders to be received, how it should be marked and addressed and information about how successful and unsuccessful tenders will be notified. Tender Registers lists all tenders received via the tender box, ordinary mail, fax or emails. Receipt and recording are done by officers independent of the procurement team and tender evaluation panel. Before tenders are evaluated, names of the tenderers will be announced by the Chair of the tender panel and members requested to advise if they have a real or potential conflict of interest, this is indicated in the Minutes of the panel meeting. Each tender panel member input their scores for each criteria in a score sheet which will be averaged to determine the total score of each bidder. 'Technical Evaluation' is done first and any bid with less than the minimum assigned score will be considered non-responsive and excluded from the 'Financial Evaluation'. Tender Evaluation Report includes list of

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						tenders received, members of the tender panel, advice on whether any members of the tender panel has a conflict and if so, how was it managed, clarifications, complaints and resolution (if any), evaluation and the recommended winning Tender. The report is submitted to the Director General who will sign approved if he or she agrees with the panel's recommendation.
7.13 Does the IP keep track of past performance of suppliers? E.g. database of trusted suppliers.		No		High	4	Performance of suppliers are undocumented.
7.14 Does the IP follow a well-defined process to ensure a secure and transparent bid and evaluation process? If so, describe the process.	Yes			Low	1	Section 6.1 of the "Financial Procedures Manual 2019" sets the IP's Procurement Principles - ethical decision making, value for money, appropriate competition and proper recording. For procurement valued at USD3,000 or less, 'shopping' method is employed directly by a person with sufficient procurement delegation, no quotation or tender required. Procurement valued between USD3,001 and USD20,000, 3 competitive written quotes is obtained and over USD20,000 public tender is required. Tender is advertised widely via social media, national newspapers and approved tender websites. The tender 'Request for Proposal' template transparently informs bidders the specification of the tender and details on how to obtain additional information, how information should be presented, evidence required to verify financial and economic capacity, professional and technical capacity, the criteria and weightings by which responses will be evaluated, date and time tenders to be received, how it should be marked and addressed and information about how successful and unsuccessful tenders will be notified. Tender Registers lists all tenders received via the tender box, ordinary mail, fax or emails. Receipt and recording are done by officers independent of the procurement team and tender evaluation panel. Before tenders are evaluated, names of the tenderers will be announced by the Chair of the tender panel and members requested to advise if they have a real or potential conflict of interest, this is indicated in the Minutes of the panel meeting. Each tender panel member input their scores for each criteria in a score sheet which will be averaged to determine the total score of each bidder. 'Technical Evaluation' is done first and any bid with

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
						less than the minimum assigned score will be considered non-responsive and excluded from the 'Financial Evaluation'. Tender Evaluation Report includes list of tenders received, members of the tender panel, advice on whether any members of the tender panel has a conflict and if so, how was it managed, clarifications, complaints and resolution (if any), evaluation and the recommended winning Tender. The report is submitted to the Director General who will sign approved if he or she agrees with the panel's recommendation.
7.15 When a formal invitation to bid has been issued, does the IP award the contract on a pre-defined basis set out in the solicitation documentation taking into account technical responsiveness and price?	Yes			Low	1	'Contract is awarded based on what was set out in the advertised Request for Proposal taking into account technical responsiveness and price. The contract is awarded based on a thorough review process using a score sheet. Decisions are based on this pre-defined basis, which take into account technical responsiveness and price. Detailed response also in the above (7.14).
7.16 If the IP is managing major contracts, does the IP have a policy on contracts management / administration?		No		Moderate	2	The IP does not manage major contracts and the value of a contract would rarely exceed USD 50,000. Contracts for general services are managed by the Property Officer, they do not require a lot of specialized contractual details and it is used for pest control services, security service providers and air-conditioning service providers etc.- refer section 8.3 of the "Financial Procedures Manual 2019". There are templates for goods, services and consultancies contract that can be amended, a Standard Conditions of Contract schedule approved by the IP's Legal Unit is appended to every significant contract, this is available in the IP's internal drive accessible by Managers and Directors.
7b. Contract Management – To be completed only for IPs managing contracts as part of program implementation. Otherwise select N/A for risk assessment						
7.17 Are there personnel specifically designated to manage contracts or monitor contract expirations?		No		Moderate	2	The respective procuring divisions or departments are responsible for managing and monitoring contract expirations.
7.18 Are there staff designated to monitor expiration of performance securities, warranties, liquidated damages and other risk management instruments?	Yes			Moderate	2	The respective procuring divisions or departments are responsible for managing and monitoring contract expirations.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
7.19 Does the IP have a policy on post-facto actions on contracts?	Yes			Moderate	2	<p>Section 8.6 of the "Financial Procedures Manual 2019" sets the policy on post facto and/or retroactive contracts. To seek the approval of post facto or retroactive contracts, procuring staff should provide:</p> <ul style="list-style-type: none"> ▶ An explanation of the circumstances resulting in the post facto or retroactive situation, such as: <ul style="list-style-type: none"> (1) what transpired (2) when (3) persons involved (4) delays resulting in late submission (5) emergency or unusual circumstances (6) processes, precautions or controls followed (7) why it still resulted in failure; and (8) what mechanisms have been put into place in order to ensure that such situations are prevented in the future. ▶ The reasonableness and acceptability of the procurement activity. ▶ Details of the activity, including the nature of services or goods; duration; cost; conformity with project requirements; and evidence of an agreement to the activity. ▶ Reasonableness of the activity or cost, demonstrating its economy, efficiency and equity. ▶ Successful completion of the activity, including certification by an authorised official that services have been satisfactorily performed, and requested outputs have been produced (i.e. reports, documentation) and are acceptable to all parties. For post facto or retroactive contract valued at and over USD3,000, the Director General is consulted.

Subject area (key questions in bold)	Yes	No	N/A	Risk Assessment	Risk points	Remarks/comments
7.20 How frequent do post-facto contract actions occur?	Yes			Low	1	Has not occurred in the last 3 years.
Total number of questions in subject area:	20					
Total number of applicable questions in subject area:	20					
Total number of applicable key questions in subject area:	5					
Total number of risk points:	34					
Risk score	1.7					
Area risk rating	Low					

Totals						
Total number of questions:	96					
Total number of applicable questions:	90					
Total number of applicable key questions:	37					
Total number of risk points:	152					
Total risk score	1.69					
Overall risk rating	Low					

Annex VII: Implementing Partner Procurement Thresholds

FFA AUTHORITY TABLES 2019						
Table1: Authority to Approve Requisitions AMOUNTS IN USD						
Officers	1. Staff Payments	2. Projects Payments	3. OPERATIONAL PURCHASES NOT INCLUDING TRAVEL IN USD	4. CAPITAL PURCHASES USD	5. Petty Cash-SBD500	6. Travel Forms/Request
Manager Finance	X	0-10,000	0-10,000	0-10,000	X	v- sign form to confirm funds
Manager HR	v 0-10,000	0-10,000	0-10,000	0-10,000	Endorse Requisition	X
Manager VMS	X	0-10,000	0-10,000	0-10,000	Endorse Requisition	X
MTA	X	0-10,000	0-10,000	0-10,000	Endorse Requisition	X
Manager Observer	X	0-10,000	0-10,000	0-10,000	Endorse Requisition	X
Manager IT	X	0-10,000	0-10,000	0-10,000	Endorse Requisition	X
Executive Officer	X	0-10,000	0-10,000	10,001-100,000	Endorse Requisition	X
Legal Counsel	X	10,001-100,000	10,001-100,000		Endorse Requisition	X
Director CSD	v 0-100,000	10,001-100,000	10,001-100,000	10,001-100,000	Endorse Requisition	v-Endorse Travel request
Director FOD	X	10,001-100,000	10,001-100,000	10,001-100,000	Endorse Requisition	v-Endorse Travel request
Director FD	X	10,001-100,000	10,001-100,000	10,001-100,000	Endorse Requisition	v-Endorse Travel request
Director FM	X	10,001-100,000	10,001-100,000	10,001-100,000	Endorse Requisition	v-Endorse Travel request
Deputy Director General	Up to 1,000,000	Up to 1,000,000	Up to 1,000,000	Up to 1,000,000	X	v-Approve Travel request
Director General	Up to the amounts so approved in the Annual Work Programme and Budget	Up to the amounts so approved in the Annual Work Programme and Budget	Up to the amounts so approved in the Annual Work Programme and Budget	Up to the amounts so approved in the Annual Work Programme and Budget	X	v-Approve Travel request

Source: Annex IV: FFA Authority Schedules- Financial Procedures Manual

Table 2 Authority to Sign Payment Vouchers , Cheques and Payment Authorities to Banks					
Officers	Staff Payments USD	Projects Payments-USD	OPERATIONAL PURCHASES INCLUDING TRAVEL IN USD	CAPITAL PURCHASES USD	Petty Cash-SBD500
<i>Management Accountant</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>✓</i>
<i>Financial Accountant</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>0-100,000</i>	<i>✓</i>
<i>Manager Finance</i>	<i>0-200,000</i>	<i>0-200,000</i>	<i>0-200,000</i>	<i>0-200,000</i>	<i>✓</i>
<i>Director CSD</i>	<i>0-500,000</i>	<i>0-500,000</i>	<i>0-500,000</i>	<i>0-500,000</i>	<i>✓</i>
<i>Deputy Director General</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>✓</i>
<i>Director General</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>Up to the amounts so approved in the Annual Work Programme and Budget</i>	<i>✓</i>

Source: Annex IV: FFA Authority Schedules- Financial Procedures Manual

Table 3: Finance One application and Authority schedules			
System Module	Responsible	Authority Required	Comments
Purchase orders	Procurement Unit	Refer Table 1 Above	-Procurement Unit cannot process PO using Finance one without the approval of requisition by the Manager or Directors - Procurement unit are to ensure all good order by FFA are duly received in good conditions and at the standard expected to avoid loss to FFA.
	Manager HRM/DCS	Approve PO in the Finance 1 System	Procurement Unit to send requisition on line to MHR or
Accounts Payable	Finance Officers and Assistant Finance Officers- Prepared Batches	Financial Accountant, Management Accountant , Manager Finance-Approved and Post transactions	The approve requisition and PO is the minimum requirement for this financial process
Accounts Receivable	Finance Officers and Assistant Finance Officers- Prepared Batches	Financial Accountant, Management Accountant , Manager Finance-Approved and Post transactions	Email and necessary supporting document required to establish transaction occurs
Financial Assets	Finance Officers Reporting	Financial Accountant, Management Accountant , Manager Finance-Approved and Post transactions	Refer Asset Policy for details
General	Finance team to access	Financial Accountant, Management Accountant , Manager Finance-Approved and Post transactions	This is to access the GL for information's

Source: Annex IV: FFA Authority Schedules- Financial Procedures Manual