



# Aljunied- Hougang Town Council

## Report on Progress

KPMG LLP

15 October 2016

This report contains 30 pages



**Aljunied-Hougang Town Council**  
Report on Progress  
15 October 2016

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## 1 Our engagement

### 1.1 This report

1.1.1 This monthly report on progress (our “Report”) is issued by KPMG LLP (“KPMG”) in accordance with the Order of the Court (the “Court Order”) in *Attorney-General v AHPETC*, Civil Appeal No. 114 of 2015. The terms of reference for this Report are as follows:

- To assist Aljunied Hougang Town Council (“AHTC”) in identifying all outstanding non-compliance (the “Audit Points”) with s35(c) of the Town Councils Act (Cap. 329A) (the “TCA”);
- To advise AHTC on the steps that must be taken to remedy such outstanding non-compliance;
- Until we are reasonably satisfied that AHTC is fully compliant with s35(c), to produce Reports on the above for AHTC’s submission to the Housing and Development Board (“HDB”) commencing 15 April 2016. Our Reports are to detail:
  - AHTC’s unresolved Audit Points; and
  - The steps that AHTC is taking to remedy the Audit Points (the “Remediation Plans”).

1.1.2 Our first Report was issued on 15 April 2016 and we concluded our recommendations to AHTC on the steps that must be taken to remedy the Audit Points in our Report of 20 July 2016.

1.1.3 Our update on the Remediation Plans is at Appendix A of this Report. AHTC has requested that we also report on AHTC’s progress in respect of the 71 control failures identified by KPMG (the “Control Failures”), which is reported at Appendix B.

### 1.2 Summary of status as at October 2016 Report

1.2.1 No Audit Points were resolved<sup>1</sup> since our September 2016 Report. AHTC has taken steps to address certain of the Audit Points as described in Appendix A, but insufficient to have brought itself into compliance with s35(c) of the TCA in respect of them.

1.2.2 For some Audit Points, Remediation Plans have been implemented by AHTC but testing of the effectiveness of the implementation cannot be completed until there are sufficient data from the operation of the new controls. These have been described as “Remediation Plans implemented, subject to testing” in this Report.

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<sup>1</sup> These Audit Points are unresolved as at the date of the Report i) because the Remediation Plans have not yet been fully implemented; ii) because the Remediation Plans have been implemented but not yet fully tested by KPMG; or iii) because of identified shortcomings in the way in which they have been remedied.



## **1.3 Progress on Remediation Plans**

### *Policies and procedures*

#### 1.3.1 Since our September 2016 Report,

- AHTC informed us that it approved and implemented the following policies and procedures on 10 October 2016 (listed at A.1.3 of this Report), some of which are subject to review by KPMG.
- AHTC provided us with its revised *Governance and Internal Control Framework* on 13 October 2016, which is subject to review by KPMG.

#### 1.3.2 As reported in our September 2016 report, the replacement Accounting System is scheduled to be deployed in two phases: phase one in January 2017 and phase two in April 2017. We were informed that phase one involves implementation of the interface between the work order system and the new accounting system.

## **1.4 Current status of Audit Points**

#### 1.4.1 The status of the Audit Points is summarized in the table below. Where the Remediation Plan for a given Audit Point has been implemented by AHTC but testing of its effectiveness and implementation cannot be completed until sufficient data are generated by the operation of the new controls, we describe them as “subject to testing”.

Appendix section	Audit Points	Status of Audit Points as at 15 October 2016		
		Resolved <sup>2</sup>	Remediation Plans in progress	
			Remediation Plans implemented, subject to testing	Subject to further review/recommendations by KPMG <sup>3</sup>
<b>Management of Sinking Fund<sup>4</sup></b>				
A.2	Incorrect computation of required transfers to the Sinking Fund, and/or shortfall or delay in transfer to Sinking Fund bank accounts			✓
	Incorrect use of Sinking Fund monies			✓
<b>Governance of related party transactions</b>				
A.3	Incomplete disclosure of transactions with the Related Parties <sup>5</sup> in the financial statements			✓
	Waiver of open tenders and competitive quotations for services provided by the Related Parties		✓	
	Lack of disclosures, due diligence and assessment of potential conflicts of interest prior to awarding contracts to the Related Parties			✓
	Weaknesses in the approval of payments to the Related Parties		✓	

<sup>2</sup> The Audit Point has been remedied such that we are reasonably satisfied that AHTC is compliant with s35(c) of the TCA in this respect.

<sup>3</sup> KPMG is either reviewing information provided by AHTC, is reviewing AHTC's Remediation Plans, or has identified further elements that should be included in the Remediation Plans. Those recommendations which have been accepted by AHTC are included in the Remediation Plans.

<sup>4</sup> Fund established and maintained by Town Councils for improvements, management and maintenance relating to residential and commercial properties in their towns.

<sup>5</sup> FM Solutions and Integrated Services (a sole proprietorship) and FM Solutions & Services Pte. Ltd.

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Appendix section	Audit Points	Status of Audit Points as at 15 October 2016		
		Resolved <sup>2</sup>	Remediation Plans in progress	
			Remediation Plans implemented, subject to testing	Subject to further review/ recommendations by KPMG <sup>3</sup>
	Approvals for services obtained and written agreements executed after the awarding and commencement of services provided by the Related Parties		✓	
<b>Management of S&amp;CC arrears</b>				
<b>A.4</b>	Management of S&CC <sup>6</sup> arrears			✓
<b>Internal controls and procurement</b>				
<b>A.5</b>	Weaknesses in the performance of bank reconciliations	✓		
	Weaknesses in controls over cheques received and valuable items and access to the strong room and safe	✓		
	Surprise examinations not conducted in accordance with TCFR <sup>7</sup>	✓		
	Weaknesses in procurement and payment-related processes		✓	
<b>Records management and accounting</b>				
<b>A.6</b>	Weaknesses in the handover process and safeguarding of accounting records			✓

<sup>6</sup> Service and conservancy charges

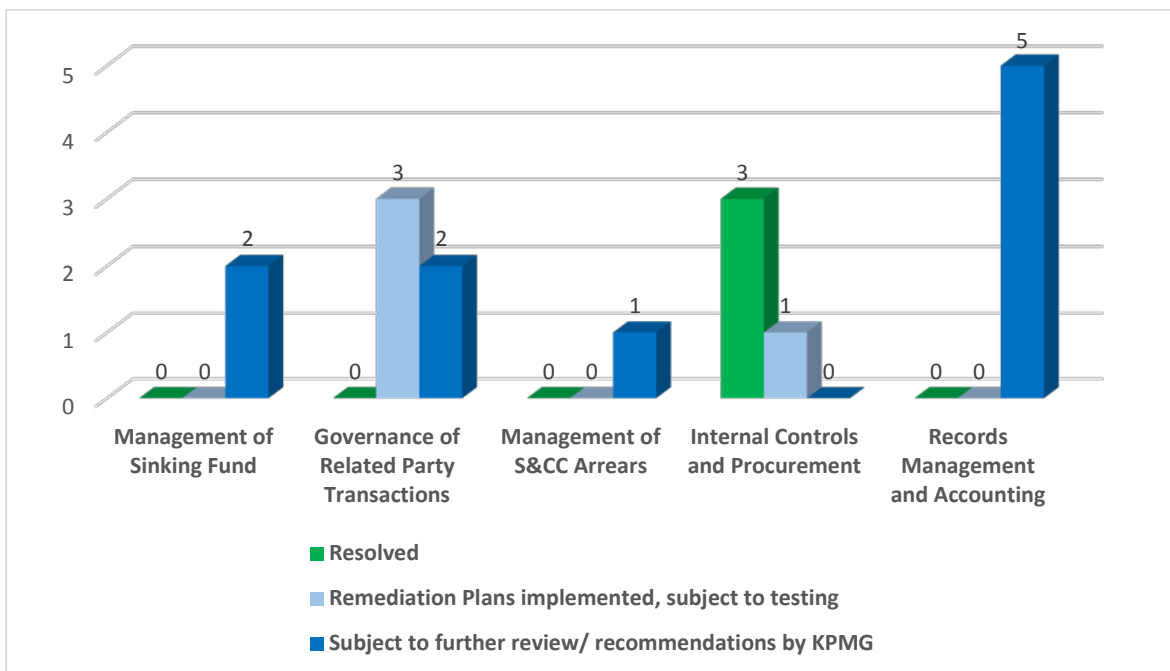
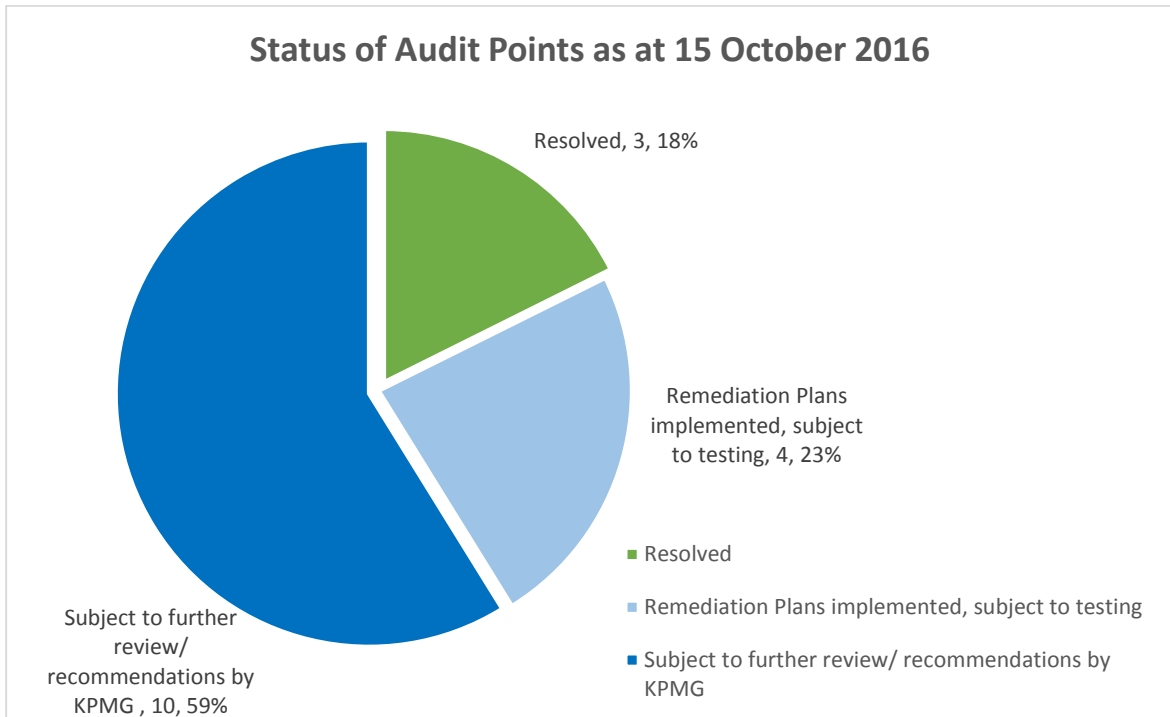
<sup>7</sup> Town Councils Financial Rules



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Appendix section	Audit Points	Status of Audit Points as at 15 October 2016		
		Resolved <sup>2</sup>	Remediation Plans in progress	
			Remediation Plans implemented, subject to testing	Subject to further review/ recommendations by KPMG <sup>3</sup>
	Untimely recording of lift repairs and upgrading expenses, and absence of guidelines for verification of works and issuance of work orders			✓
	Absence of monitoring of and exercising diligence over collection from/payment to external parties and items in temporary clearing accounts			✓
	Reconciliation of direct and indirect tax			✓
	Opening balances			✓

1.4.2 The following diagrams summarize the current remediation status of the Audit Points. Where the Remediation Plan for a given Audit Point has been implemented by AHTC but testing of its effectiveness and implementation cannot be completed until sufficient data are generated by the operation of the new controls, they have been described as “Remediation Plans subject to testing”.







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### **1.5 Use of this Report**

- 1.5.1 Our procedures do not constitute an audit, a review or an assurance engagement made in accordance with Singapore Standards on Auditing, Singapore Standards on Review Engagements or Singapore Standards on Assurance Engagement. We are not qualified to provide legal advice. We are also not responsible or accountable for the management, conduct and operation of AHTC's business and affairs. Our findings and comments are based on our understanding of the law, regulations and guidelines, and should not be construed as constituting legal advice by us.
- 1.5.2 Our engagement is directed at compiling information to report on certain matters, and cannot be relied upon to disclose all fraud, defalcations or other irregularities or any non-compliance with relevant laws and regulations other than s35(c) of the TCA. Our Reports are not to be used for any purpose outside the terms of reference as described at paragraph 1.1.1 of our April 2016 Report.
- 1.5.3 Our Reports are strictly for the purpose of assisting and updating AHTC and HDB on the matters highlighted. Our Reports should not be regarded as suitable for use for any other purpose or by any other person. Should such a person choose to rely on these Reports they do so at their own risk. KPMG will accordingly accept no responsibility or liability in respect of it to persons other than AHTC or HDB.

## A Appendix: status as at October 2016 Report

### A.1 Root causes

S/N	Root cause	Remediation Plan	Progress	Status
1	AHTC's governance framework and policy management	Implement a governance and internal control framework.	<p>AHTC has drafted an outline of the governance and internal control framework, which is pending completion of contents.</p> <p>AHTC has drafted an <i>Enterprise Risk Management Policy</i>, which was provided to us on 31 August 2016. AHTC informed us that this policy was introduced at the Town Council Inaugural Emergency Response management meeting on 29 August 2016.</p> <p>AHTC has provided a revised version of its Governance and Internal Control framework to KPMG on 13 October 2016.</p>	Remedial measures in progress
2		Implement a policy management process to govern the creation, updating and management of all corporate policies and procedures.	AHTC has revised its delegation of authority in the <i>Management &amp; Procedural Manual Policy</i> on 13 October 2016.	Remedial measures in progress
3		Implement policies and supporting procedures in areas where enhancement or development is required.	<p>AHTC informed us that it approved and implemented the following policies and procedures on 10 October 2016, some of which are subject to review by KPMG:</p> <ul style="list-style-type: none"> <li>— <i>Management and Procedural Manual;</i></li> <li>— <i>Information and Data Security;</i></li> <li>— <i>Backup and Data Retention;</i></li> <li>— <i>ERP Change Request;</i></li> <li>— <i>Recruitment and Selection;</i></li> </ul>	Remedial measures in progress

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S/N	Root cause	Remediation Plan	Progress	Status
			<ul style="list-style-type: none"> <li>— Personnel Documentation and Administration;</li> <li>— Compensation, Overtime;</li> <li>— Performance Appraisal and Rewards Management;</li> <li>— Benefits;</li> <li>— Employee Grievances;</li> <li>— Exit Management;</li> <li>— Media Relations;</li> <li>— Posters and Notices;</li> <li>— Daily Media Monitoring;</li> <li>— Website Management;</li> <li>— Residents' Disputes;</li> <li>— Incoming Documents;</li> <li>— Applications for Installation of CCTV Outside Unit;</li> <li>— Public Liability Insurance Claim;</li> <li>— Request for Trench Excavation;</li> <li>— Permits for Use of Common Property;</li> <li>— Permits to Use Common Area;</li> <li>— Town Council Maintenance Report (TCMR);</li> <li>— Notice of Composition;</li> <li>— Archives Documentation;</li> <li>— Issuance and Withdrawal of Key;</li> <li>— Graffiti and Loan Shark Cases;</li> <li>— Disaster Recovery Plan;</li> <li>— Spalling Concrete;</li> </ul>	

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S/N	Root cause	Remediation Plan	Progress	Status
			<ul style="list-style-type: none"> <li>— <i>Inspection and Repair of Water Seepage;</i></li> <li>— <i>Carpark Maintenance;</i></li> <li>— <i>Conservancy and Cleaning;</i></li> <li>— <i>Access Approval for Consumer Switch Room REV;</i></li> <li>— <i>Quarter Maintenance of Consumer Switch Room;</i></li> <li>— <i>Monthly Maintenance of Oscillating Fans;</i></li> <li>— <i>Bomb Threats;</i></li> <li>— <i>Fights;</i></li> <li>— <i>Gas Leaks;</i></li> <li>— <i>Grass Cutting and Horticulture Maintenance;</i></li> <li>— <i>Attending to Sanitary Cases;</i></li> <li>— <i>Request of Variation Orders (RVOs);</i></li> <li>— <i>Use of Sinking Fund;</i></li> <li>— <i>Maintenance of Lifts;</i></li> <li>— <i>Imposition of Liquidated Damages;</i></li> <li>— <i>CCTV Footage Retrieval;</i></li> <li>— <i>Taking Over of New and Lift Upgrading Programme Lifts;</i></li> <li>— <i>Issuance of Written Instructions to Contractors;</i></li> <li>— <i>Issuance of Work Orders to Contractors; and</i></li> <li>— <i>Matching Of Tax Invoice.</i></li> </ul>	
4	AHTC's accounting practices	Establish clear guidance on roles and responsibilities for Finance Department staff.	Resolved, as reported in our August 2016 Report.	Resolved

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S/N	Root cause	Remediation Plan	Progress	Status
5		Establish an accounting manual covering accounting policies and supporting procedures in order to institutionalize practices and processes.	The following policies and procedures have been drafted: <ul style="list-style-type: none"> <li>- <i>Accounting Policy – Period End Closing, including Period End Closing Checklist;</i></li> <li>- <i>Policy on Sinking Fund Transfer and Procedures on Sinking Fund Transfer;</i></li> <li>- <i>Accounts Payable policy;</i></li> <li>- <i>Fixed Assets Policy;</i></li> <li>- <i>Cash Handling policy;</i></li> <li>- <i>Petty Cash Management Policy;</i></li> <li>- <i>Bank Management Policy;</i> and</li> <li>- <i>S&amp;CC Billing Policy.</i></li> </ul>	No update as of this Report. Remedial measures in progress.
6		Implement controls for accounting procedures, including controls and maintenance of audit trail for re-opening of locked accounting periods and back-posting of accounting entries.	AHTC has implemented an approval form for the re-opening of locked accounting periods.  AHTC will amend the user access rights to its replacement Accounting System <sup>8</sup> to restrict the personnel who can lock and re-open locked accounting periods.	No update as of this Report. Remedial measures in progress.
7		Following completion of KPMG’s engagement, engage internal auditors to provide independent assurance that AHTC’s risk management, governance and internal control processes are operating effectively.	AHTC has issued a request for quotation for internal audit services to provide independent assurance that AHTC’s risk management, governance and internal control processes are operating effectively. The internal auditor will report directly to AHTC’s Audit Committee.  AHTC has received a quote and is considering its next step.	No update as of this Report. Remedial measures in progress.
8	AHTC Finance Department’s capability and management	Strengthen the capabilities of the Finance Department.	AHTC has promoted one of its Deputy Finance Managers to Finance Manager.	No update as of this Report.

<sup>8</sup> Accounting platform used by AHTC to record and account for its transactions.

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S/N	Root cause	Remediation Plan	Progress	Status
	personnel retention		AHTC informed us that it has reorganized its Finance Department resources to expedite the clearing of the temporary accounts and that the process of clearing temporary accounts is ongoing.	Remedial measures in progress.
9	AHTC's Accounting System	Replace the current Accounting System financial modules and incorporate other improvements.	AHTC awarded the contract for the new Accounting System on 25 July 2016. The replacement system is scheduled to be deployed in two phases, phase one in January 2017 and phase two in April 2017.	No update as of this Report. Remedial measures in progress.
10		Ensure the general ledger control accounts in the Accounting System are appropriately configured so that the balances in the general ledger accounts are derived from, and match, the corresponding sub-ledgers.	AHTC is in the process of reconciling the balances in its sub-ledgers to the general ledger accounts. In addition to performing month end balance sheet substantiation and reconciliation, AHTC will ensure that, once the new Accounting System is implemented, manual entries cannot be posted directly to general ledger accounts that are linked to sub-ledgers.	No update as of this Report. Remedial measures in progress.
11		Arrange for the provision of detailed transaction reports to provide the information required for AHTC's Finance Department to review and substantiate management and financial reporting.	AHTC is in the process of improving its period end management and financial reporting by including the following in its reporting package: <ul style="list-style-type: none"> <li>- Substantiation schedule for each balance sheet item; and</li> <li>- Present the gazetted budget (pro-rated to the relevant period) alongside profit and loss items.</li> </ul>	No update as of this Report. Remedial measures in progress.

## A.2 Management of Sinking Fund

S/N	Audit Point	Remediation Plan	Progress	Status
12	Incorrect computation of required transfers to the Sinking Fund, and/or shortfall or delay in transfer to Sinking Fund bank accounts	Establish a policy and supporting procedures to govern transfers to the Sinking Fund bank accounts.	AHTC is revising its draft <i>Policy on Sinking Fund Transfer and Procedures on Sinking Fund Transfer</i> .	No update as of this Report. Remedial measures in progress.
13		Identify and rectify erroneous and/or delayed transfers to the Sinking Fund bank accounts.	Pending AHTC's investigation of variances between AHTC's calculations and KPMG's calculations of Sinking Fund transfers noted during our June 2016 Report.	No update as of this Report. Remedial measures in progress.
14		Verify the accuracy of the calculation of Sinking Fund transfers from income sources other than S&CC (e.g. input Goods & Services Tax ("GST") and government grants).	Pending AHTC's investigation of variances between AHTC's calculations and KPMG's calculations of Sinking Fund transfers noted during our June 2016 Report.	No update as of this Report. Remedial measures in progress.
15		Establish standardized documentation and supporting documentation requirements for calculation, review and approval of Sinking Fund transfers.	AHTC is revising the draft <i>Policy on Sinking Fund Transfer and Procedures on Sinking Fund Transfer</i> .	No update as of this Report. Remedial measures in progress.
16		Implement guidelines on the types of expenses for which the Sinking Fund may be used.	Resolved, as reported in our April 2016 Report.	Resolved
17	Identify and rectify any erroneous and/or delayed transfers to the Sinking Fund bank accounts	Identify and rectify instances where monies in the Sinking Fund bank accounts were incorrectly used.	Pending AHTC's investigation of variances between AHTC's calculations and KPMG's calculations of Sinking Fund transfers noted during our June 2016 Report.	No update as of this Report. Remedial measures in progress.

### A.3 Governance of related party transactions

S/N	Audit Point	Remediation Plan	Progress	Status
18	Incomplete disclosure of transactions with the Related Parties in the financial statements	Establish a policy and supporting procedures for related parties and transactions with related parties to ensure that AHTC complies with s35(c) of the TCA and that its financial statements comply with <i>Financial Reporting Standard 24 Related Party Disclosures</i> ("FRS24").	<i>Related Parties Transactions Policy</i> has been established.	Remedial measures subject to testing.
19	Waiver of open tenders and competitive quotations for services provided by the Related Parties	Implement policies and procedures on the calling of quotations and tenders.	<i>SOP for calling for quotations</i> and <i>SOP for tenders</i> have been established.	Remedial measures subject to testing.
20	Lack of disclosures, due diligence and assessment of potential conflicts of interest prior to awarding contracts to the Related Parties	Implement policy and procedures to identify and manage conflicts of interest.	<i>Conflict of Interest Policy</i> has been established	Remedial measures subject to testing.
21	Lack of disclosures, due diligence and assessment of potential conflicts of interest prior to awarding contracts to the Related Parties	Implement a <i>Code of Business Conduct</i> .	AHTC is revising its draft <i>Code of Business Conduct</i> .	No update as of this Report. Remedial measures in progress.
22	Weaknesses in the approval of payments to the Related Parties	Implement policy and procedures to govern the approval of payments to related parties.	<i>Related Parties Transactions Policy</i> has been established.	Remedial measures subject to testing.
23	Approvals for services obtained and written agreements executed after the awarding and commencement of services provided by the Related Parties	Implement a contract management policy, supported by procedures, to manage the awarding and execution of services provided by external parties.	<i>Contract Management Policy</i> has been established.	Remedial measures subject to testing.



## A.4 Management of S&CC arrears

S/N	Audit Point	Remediation Plan	Progress	Status
24	Management of S&CC arrears	Configure the Accounting System to generate the S&CC arrears data automatically.	<p>AHTC has partially automated the preparation of the S&amp;CC arrears report.</p> <p>AHTC performed a detailed user acceptance test on the July 2016 S&amp;CC arrears report after the rectification of programming errors and omission of certain requirements (as described in our July 2016 Report). We have tested AHTC's review process for the accuracy of S&amp;CC arrears reports for the July 2016 S&amp;CC report.</p> <p>AHTC informs us that it has completed user acceptance tests on the S&amp;CC arrears reports for the months of May 2016 to July 2016. AHTC intends to resubmit its S&amp;CC arrears reports of the previous year to HDB.</p>	Resolved
25		Perform detailed user acceptance testing of the automated extraction of S&CC arrears data, which includes reconciliation with the accounts receivable sub-ledger.	<p>AHTC performed a detailed user acceptance test on the July 2016 S&amp;CC arrears report after the rectification of programming errors and omission of certain requirements (as described in our July 2016 Report).</p> <p>AHTC is in the process of performing a reconciliation of the extracted S&amp;CC arrears data from the accounts receivable sub-ledger with the S&amp;CC arrears data in the General Ledger.</p>	No update as of this Report. Remedial measures in progress.

S/N	Audit Point	Remediation Plan	Progress	Status
26		Establish policies and supporting procedures to govern the maintenance of the master data, including bill codes and user access rights to AHTC's Accounting System.	AHTC is revising its draft <i>User Access Rights Policy</i> , which includes a User Access Rights Matrix  AHTC will implement revised access rights in its replacement Accounting System. The replacement Accounting System is scheduled to be deployed in two phases, phase one in January 2017 and phase two in April 2017.	No update as of this Report. Remedial measures in progress.

## A.5 Internal controls and procurement

S/N	Audit Point	Remediation Plan	Progress	Status
27	Weaknesses in the performance of bank reconciliations	Perform monthly closing of accounts to facilitate the performance of bank reconciliations.	Monthly closing of accounts has been performed since April 2016.	Resolved
28		Monitor, investigate and address bank reconciling items in a timely manner.	These requirements are included in the <i>Accounting Policy – Period End Closing and Period End Closing Checklist</i> .	
29		Implement a written policy and procedures for bank reconciliations.		
30	Weaknesses in controls over cheques received and valuable items and access to the strong room and safe	Implement processes for recording of incoming mail and cheques.	Resolved, as reported in our April 2016 Report.	Resolved
31		Implement processes for handover and sign-off of incoming cheques from the receptionist to the Finance Department.	Resolved, as reported in our April 2016 Report.	

S/N	Audit Point	Remediation Plan	Progress	Status
32	Surprise examinations not conducted in accordance with TCFR	Conduct surprise cash examinations and maintain records of examinations.	Resolved, as reported in our April 2016 Report.	Resolved
33		Establish policy on conduct and responsibility for surprise cash examinations.	Resolved, as reported in our April 2016 Report.	Resolved
34	Weaknesses in procurement and payment-related processes	Establish policies and supporting procedures to govern procurement and payment-related processes.	See Appendix A, S/N 3.  AHTC has informed us that Phase One of the new Accounting System, scheduled to be deployed in January 2017, will include the interface between work order systems to the new accounting system.	Remedial measures in progress.

## A.6 Records management and accounting

S/N	Audit Point	Remediation Plan	Progress	Status
35	Weaknesses in the handover process and safeguarding of accounting records	Establish policies and supporting procedures for handing- and taking-over of duties and records.	AHTC had approved and implemented its <i>Exit Management Policy</i> on 10 October 2016.	Resolved

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S/N	Audit Point	Remediation Plan	Progress	Status
36		Establish policies and supporting procedures for business continuity management, supported by a business continuity plan and disaster recovery plan.	See Appendix A, S/N 3.  AHTC has commenced its risk assessment exercise with the respective heads of department to identify critical areas.  Documentation of AHTC's business continuity plan, crisis management plan, escalation protocols and periodic testing procedures are to be progressively worked on with target completion by the calendar year-end.	Remedial measures in progress.
37		Establish policies and supporting procedures for data back-up.	AHTC informed us that it approved and implemented its <i>Back-up and Data Retention Policy</i> on 10 October 2016.	Resolved
38	Untimely recording of lift repairs and upgrading expenses, and absence of guidelines for verification of works and issuance of work orders	Establish an accounting manual covering accounting policies and supporting procedures in order to institutionalize practices and processes.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.
39		Implement a budget monitoring process.	AHTC's Finance Department has, with effect from FYE 2017, performed monthly variance analyses on AHTC's budget and actual expenditure for the Operating Funds <sup>9</sup> .	Resolved

<sup>9</sup> Town Council funds for short-term routine expenditure, e.g. estate cleaning, repairs and maintenance.

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S/N	Audit Point	Remediation Plan	Progress	Status
40	Absence of monitoring of and exercising diligence over collection from/payment to external parties and items in temporary clearing accounts	Implement a reconciliation process between balances in sub-ledgers and general ledger.	Accounting policy and supporting procedures governing reconciliation process between balances in the sub-ledgers and general ledger and balance sheet substantiation have been drafted.  AHTC is in the process of performing Balance sheet substantiation.	No update as of this Report. Remedial measures in progress.
41		Clear items in the temporary clearing accounts.	AHTC informed us that it has reorganized its Finance Department resources to expedite clearing of the temporary accounts; the process of clearing temporary accounts is ongoing.	No update as of this Report. Remedial measures in progress.
42	Reconciliation of direct and indirect tax	Completion of the self-review of past GST returns and disclosure of errors to the Inland Revenue Authority of Singapore under the Voluntary Disclosure Programme.	AHTC has commenced the self-review, which its Finance Department has indicated can be completed only once the temporary accounts have been cleared.	No update as of this Report. Remedial measures in progress.
43		Computation of input GST claimed on Sinking Fund expenditure that should be transferred to the Sinking Fund bank account.	AHTC has commenced the computation of the input GST.	No update as of this Report. Remedial measures in progress.
44	Opening balances	Resolve opening balances	AHTC has commenced investigation of the matters raised by its external auditors on the opening balances.	No update as of this Report. Remedial measures in progress.



## B Appendix: Control Failures identified by KPMG

S/N	Control Failure	Progress	Status
1	No policy management process to manage the creation, updating and management of policies and procedures.	See Appendix A, S/N 2.  AHTC informed us that it approved and implemented its <i>Management and Procedural Manual Policy</i> on 10 October 2016, which is subject to review by KPMG.	Remedial measures in progress.
2	No governance and internal control framework providing a top-down structure for town council governance, compliance, and risk management.	See Appendix A, S/N 1.	Remedial measures in progress.
3	Terms of reference for AHTC's committees were recorded in its minutes of meeting, rather than as stand-alone documents. The updated terms of reference documents were approved by the General Manager, rather than the Town Councillors.	The revised terms of reference have been adopted by the Town Council.	Resolved
4	Monthly closing of the accounts was not performed.	See Appendix A, S/N 27.	Resolved
5	Reconciling items in bank reconciliations were not investigated and resolved in a timely fashion.	See Appendix A, S/N 28.	Resolved
6	Balance sheet substantiation was not performed.	See Appendix A, S/N 40.	No update as of this Report. Remedial measures in progress.
7	No governance for re-opening of locked accounting periods and back-posting of accounting entries.	See Appendix A, S/N 6.	No update as of this Report. Remedial measures in progress.
8	No accounting manual to provide, among other things, guidance on accounting treatments, period-end closing procedures, maintenance of the chart of accounts, and accounting-related controls.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.



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S/N	Control Failure	Progress	Status
9	No written roles and responsibilities for the Finance Department and its staff.	See Appendix A, S/N 4.	Resolved
10	Inability to generate certain types of accounting reports (e.g. S&CC receivable listing) and certain detailed reports to substantiate some balances in the general ledger.	See Appendix A, S/N 9, 10 and 11.	No update as of this Report. Remedial measures in progress.
11	Inability to complete certain accounting operations automatically, such as year-end balance rollovers.	See Appendix A, S/N 9 and 10.	No update as of this Report. Remedial measures in progress.
12	No policies or procedures for Sinking Fund transfers.	See Appendix A, S/N 12.	No update as of this Report. Remedial measures in progress.
13	No policies or procedures for the disclosure of related parties and transactions with related parties to ensure compliance with s35(c) of the TCA and FRS24.	See Appendix A, S/N 18.	Remedial measures subject to testing.
14	Standard operating procedures on the calling for quotation and tenders do not include the criteria, documentation, justification, and approval process for waivers of competition and quotations.	See Appendix A, S/N 19.	Remedial measures subject to testing.
15	<i>Conflicts of Interest</i> policy does not extend to Town Councillors nor is covered in the terms of reference found in the meeting minutes for Town Councillors or AHTC's committees.	See Appendix A, S/N 20.	Remedial measures subject to testing.
16	No code of conduct.	See Appendix A, S/N 21.	No update as of this Report. Remedial measures in progress.

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S/N	Control Failure	Progress	Status
17	Management and employees are neither prohibited from seeking or holding external employment nor are they required to declare board positions or directorships in or ownership of other organizations.	See Appendix A, S/N 20.	Remedial measures subject to testing.
18	<i>Conflict of Interest</i> policy does not explicitly cover the approval of payments to related parties.	See Appendix A, S/N 20.	Remedial measures subject to testing.
19	No written contract management policy.	See Appendix A, S/N 23.	Remedial measures subject to testing.
20	Infrequent review by the Finance & Investment Committee of S&CC arrears reports.	AHTC is to send the monthly S&CC arrears report to the Finance & Investment Committee by mid-month for their review prior to submission to MND <sup>10</sup> /HDB. The August S&CC report was submitted to the Finance & Investment Committee on 14 September 2016.	Resolved
21	No formal user guide for S&CC reporting.	AHTC informs us that its <i>User &amp; Technical Manual – Automated Generation of Monthly HDB S&amp;CC Arrears Report</i> , a user guide for generating the S&CC report, will be finalized on 12 October 2016.	Remedial measures in progress.
22	No policies or procedures for bank reconciliations.	See Appendix A, S/N 29.	Resolved
23	Policies and procedures for procurement and payment-related processes do not include vendor due diligence, evaluation and management, and waiver for competition and tender.	See Appendix A, S/N 19 and 34.	Remedial measures subject to testing.
24	No written policies or procedures for the handing-over of duties and records.	See Appendix A, S/N 35.	Resolved

<sup>10</sup> Ministry of National Development



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S/N	Control Failure	Progress	Status
25	Project progress has not been tracked for the purpose of liability accruals (although the spreadsheet on which project progress is tracked can be used for such purpose).	See Appendix A, S/N 34.	Remedial measures in progress.
26	Temporary clearing accounts not investigated and cleared.	See Appendix A, S/N 41.	No update as of this Report. Remedial measures in progress.
27	Input GST is claimed on work order accruals (when the work is completed but not billed) ahead of the receipt of invoices from suppliers.	As reported in our August 2016 Report, input GST is now reported upon receipt of invoices from suppliers.	Resolved
28	Output GST on S&CC is reported upon billing; therefore, output GST is not reported in AHTC's GST returns on S&CC monies which are received in advance, ahead of billing.	As reported in our August 2016 Report, output GST is now reported upon receipt of S&CC monies.	Resolved
29	No formal IT back-up policy.	See Appendix A, S/N 37.	Resolved
30	No business continuity management policy, business continuity plan and disaster recovery plan.	See Appendix A, S/N 3 and 36.	Remedial measures in progress.
31	Duplicate transfer to a Sinking Fund bank account.	As reported in our June 2016 Report, AHTC has transferred the sum of SGD157,141.01 back to its Operating Fund.	Resolved
32	The accounts receivable sub-ledgers as at 31 March 2015 do not match the trial balance for the same period. The numbers, derived from the accounts receivable sub-ledger, used to calculate the S&CC arrears attributable to the Sinking Fund do not match those in the FYE 2015 audited financial statements.	See Appendix A, S/N 40.	No update as of this Report. Remedial measures in progress.
33	Voiding entries pertaining to cancellations of long-outstanding unrepresented cheques have not been posted to the general ledger.	As reported in our August 2016 Report, AHTC has cleared the voiding entries.	Resolved

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S/N	Control Failure	Progress	Status
34	No formal budget monitoring process/variance analysis on budget and actual expenditure.	AHTC's Finance Department has, with effect from FYE 2017, performed monthly variance analyses on AHTC's budget and actual expenditure for the Operating Funds.	Resolved
35	Liabilities for partially completed work are not captured in the Work Order System.	See Appendix A, S/N 34.	Remedial measures in progress.
36	Payment processing can be done directly in the Accounting System without using the Work Order System.	See Appendix A, S/N 34.	Remedial measures in progress.
37	Project expenditure exceeded the annual estimates at the "sub-head" level which was not gazetted in the supplementary estimates for FYE 2015, as required by TCFR Rule 10.	See Appendix A, S/N 11.	No update as of this Report. Remedial measures in progress.
38	Work on lift maintenance services commenced prior to the signing of the articles of agreement.	See Appendix A, S/N 34.	Remedial measures in progress.
39	Output GST has not been applied to legal fees billed to debtors.	As reported in our August 2016 Report, AHTC now reports the output tax to IRAS and has absorbed the unbilled output GST.	Resolved
40	No information/data security policy.	AHTC approved and implemented its <i>Information and Data Security Policy</i> on 10 October 2016.	Resolved
41	No policies or procedures governing the maintenance of master data, including the bill codes, in the Accounting System.	See Appendix A, S/N 26.	No update as of this Report. Remedial measures in progress.
42	No detailed user acceptance testing performed prior to the implementation of the automated extraction of S&CC arrears data.	See Appendix A, S/N 25.	No update as of this Report. Remedial measures in progress.
43	The S&CC arrears report for March 2016 did not reconcile with the accounts receivable sub-ledger.	See Appendix A, S/N 25.	No update as of this Report. Remedial measures in progress.

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S/N	Control Failure	Progress	Status
44	The April 2016 monthly collectible data was incorrectly extracted from a May 2016 report, resulting in an understatement of collectibles of SGD11,400.22 in the reporting to the Ministry of National Development (“MND”) for April 2016.	AHTC resubmitted the April 2016 S&CC arrears report on 16 August 2016.	Resolved
45	Changes can be made directly to bill codes without formal approval.	See Appendix A, S/N 26.	No update as of this Report. Remedial measures in progress.
46	No audit trail report to facilitate independent review of changes made to master data.	See Appendix A, S/N 26.	No update as of this Report. Remedial measures in progress.
47	The user access rights' matrix to the Accounting System does not provide the necessary details to facilitate periodic reviews of the appropriateness of access rights granted to users.	See Appendix A, S/N 26.	No update as of this Report. Remedial measures in progress.
48	Supporting documents (e.g. invoices and job sheets) for payments are not invalidated to prevent resubmission of duplicate payments.	See Appendix A, S/N 34.	Remedial measures subject to testing.
49	Monthly routine lift maintenance services have been performed without Work Orders.	See Appendix A, S/N 34.	Remedial measures subject to testing.
50	Written Instructions and Work Orders have been issued in incorrect FYEs, after work had been undertaken.	See Appendix A, S/N 34.	Remedial measures subject to testing.
51	<i>Works Instruction &amp; Work Order Approval Matrix</i> dated 4 March 2016 is not consistent with the <i>Delegation of Authority Matrix</i> .	See Appendix A, S/N 34.	Remedial measures subject to testing.

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S/N	Control Failure	Progress	Status
52	Written Instructions approved prior to the establishment of the <i>Works Instruction &amp; Work Order Approval Matrix</i> were not approved in accordance with the <i>Delegation of Authority Matrix</i> .	See Appendix A, S/N 34.	Remedial measures subject to testing.
53	Approval of Written Instructions after the completion of work.	See Appendix A, S/N 34.	Remedial measures subject to testing.
54	Use of four sundry accounts to record unallocated receipts and payments.	See Appendix A, S/N 41.	No update as of this Report. Remedial measures in progress.
55	Variances between the balances in the general ledger and aggregated balances in the sub-ledgers as at 31 March 2016 for i) trade and other receivables (excluding deposits and prepayments); and ii) trade and other payables (excluding accrued expenses).	See Appendix A, S/N 10 and 40.	No update as of this Report. Remedial measures in progress.
56	Use of Direct Payment Journal Entries <sup>11</sup> to record payments.	See Appendix A, S/N 5 and 10.	No update as of this Report. Remedial measures in progress.
57	Use of and absence of monitoring of a dummy code to record <i>ad hoc</i> payments to one-time suppliers.	See Appendix A, S/N 5. AHTC is revising its draft accounting policy to include guidance and monitoring mechanism on use of one-time supplier code.	No update as of this Report. Remedial measures in progress.
58	Omission of a liability aged more than three years.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.

<sup>11</sup> Journal entries used to record payments to third parties bypassing the accounts payable.

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S/N	Control Failure	Progress	Status
59	No follow-up or investigation of 48 payable accounts outstanding for more than three years.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.
60	Duplicate recording of a payable outstanding for more than three years.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.
61	<i>Fixed Assets Schedule</i> as at 31 March 2016 does not match the trial balance for the same period.	As reported in our August 2016 Report, AHTC has reconciled the <i>Fixed Asset Schedule</i> as at 30 June 2016 to its trial balance.	Resolved
62	Reconciliations between the <i>Fixed Assets Schedule</i> and <i>IT Assets Listing</i> have not been performed.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.
63	The <i>Fixed Assets Schedule</i> lacks asset details (e.g. tag number and locations) to facilitate verifying that fixed assets are still in the control of AHTC.	As reported in our August 2016 Report, AHTC has updated its <i>Fixed Assets Schedule</i> .	Resolved
64	Duplicate recording of a desktop in the <i>IT Assets Listing</i> .	As reported in our August 2016 Report, AHTC has removed the duplicate record.	Resolved
65	The location of three desktops, one CPU and one monitor were not updated correctly in the <i>IT Assets Listing</i> .	As reported in our August 2016 Report, AHTC has updated the locations.	Resolved
66	No policies or procedures for fixed assets.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.
67	The Accounting System to automatically generate the S&CC arrears data was configured incorrectly.	See Appendix A, S/N 24.	Resolved



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S/N	Control Failure	Progress	Status
68	Proper program change documentation not maintained for the re-configuration of the Accounting System to automatically generate the S&CC arrears data.	AHTC approved and implemented its <i>ERP Change Request Policy</i> on 10 October 2016.	Resolved
69	No verification of vacant units against data from HDB and the National Environment Agency.	AHTC has commenced discussions on the verification process and has informed us that it will perform the necessary reconciliation.	No update as of this Report. Remedial measures in progress.
70	Variances in the <i>SC Rebate Clearing</i> account between the S&CC rebate credited by AHTC to eligible Singaporeans for the rebate and the amounts reimbursed by MND to AHTC in the <i>SC Rebate Clearing</i> account.	See Appendix A, S/N 41.	No update as of this Report. Remedial measures in progress.
71	Finance Department had processed payments without evidence of verification of payment documentation by the process owners.	See Appendix A, S/N 5.	No update as of this Report. Remedial measures in progress.