

# Arun District Council Completion Report for Those Charged with Governance

Year ended 31 March 2023

Report issued – 8 November 2024



Audit and Governance Committee  
Arun District Council  
Civic Centre, Maltravers Road  
Littlehampton, West Sussex  
BN17 5LF

8 November 2024

Dear Audit and Governance Committee

Completion Report for Those Charged With Governance

Attached is our Completion Report for Those Charged With Governance. The purpose of this report is to provide the Audit and Governance Committee of Arun District Council (the Council) with a detailed report covering our approach and outcomes of the 2022/23 audit.

Given that Statutory Instrument (2024) No. 907 - "The Accounts and Audit (Amendment) Regulations 2024" (the SI) imposes a backstop date of 13 December 2024 by which date we are required to issue our opinion on the financial statements, we have considered whether the time constraints imposed by the backstop date mean that we cannot complete all necessary procedures to obtain sufficient, appropriate audit evidence to support the opinion and fulfil all the objectives of all relevant ISAs (UK).

This decision is in line with ISA 200: Failure to Achieve an Objective 24.

If an objective in a relevant ISA (UK) cannot be achieved, the auditor shall evaluate whether this prevents the auditor from achieving the overall objectives of the auditor and thereby requires the auditor, in accordance with the ISAs (UK), to modify the auditor's opinion or withdraw from the engagement (where withdrawal is possible under applicable law or regulation). Failure to achieve an objective represents a significant matter requiring documentation in accordance with ISA (UK) 230 (Revised June 2016).4 (Ref: Para. A77&A78)

Taking the above into account, for the year ended 31 March 2023 we have determined that we cannot meet the objectives of the ISAs (UK) and we anticipate issuing a disclaimed audit report.

In completing our work for this audit year, we have taken into account Statutory Instrument (2024) No. 907 - "The Accounts and Audit (Amendment) Regulations 2024" and Local Authority Reset and Recovery Implementation Guidance. We have also taken into account the requirements of the Local Audit and Accountability Act 2014, the National Audit Office's 2020 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements.

This report considers the impact of Government proposals to clear the backlog in local audit and put the local audit system on a sustainable footing. The joint statement on the update to proposals to clear the backlog and embed timely audit recognises that timely, high-quality financial reporting and audit of local bodies is a vital part of our democratic system. Not only does it support good decision making by local bodies, by enabling them to plan effectively, make informed decisions and manage their services, it ensures transparency and accountability to local taxpayers. All stakeholders have a critical role to play in addressing the audit backlog.

The Audit and Governance Committee, as the Council's body charged with governance, has an essential role in ensuring that it has assurance over both the quality of the draft financial statements prepared by management and the Council's wider arrangements to support the delivery of a timely and efficient audit.

We will consider and report on the adequacy of the Council's external financial reporting arrangements and the effectiveness of the audit committee in fulfilling its role in those arrangements as part of our assessment of Value for Money arrangements and consider the use of other statutory reporting powers to draw attention to weaknesses in those arrangements where we consider it necessary to do so.

We draw Audit and Governance Committee members and officers' attention to the Public Sector Audit Appointment Limited's Statement of Responsibilities (paragraphs 26-28) which clearly set out what is expected of audited bodies in preparing their financial statements (see Appendix D).

This report is intended solely for the information and use of the Audit and Governance Committee, and management, and is not intended to be and should not be used by anyone other than these specified parties.

Yours faithfully

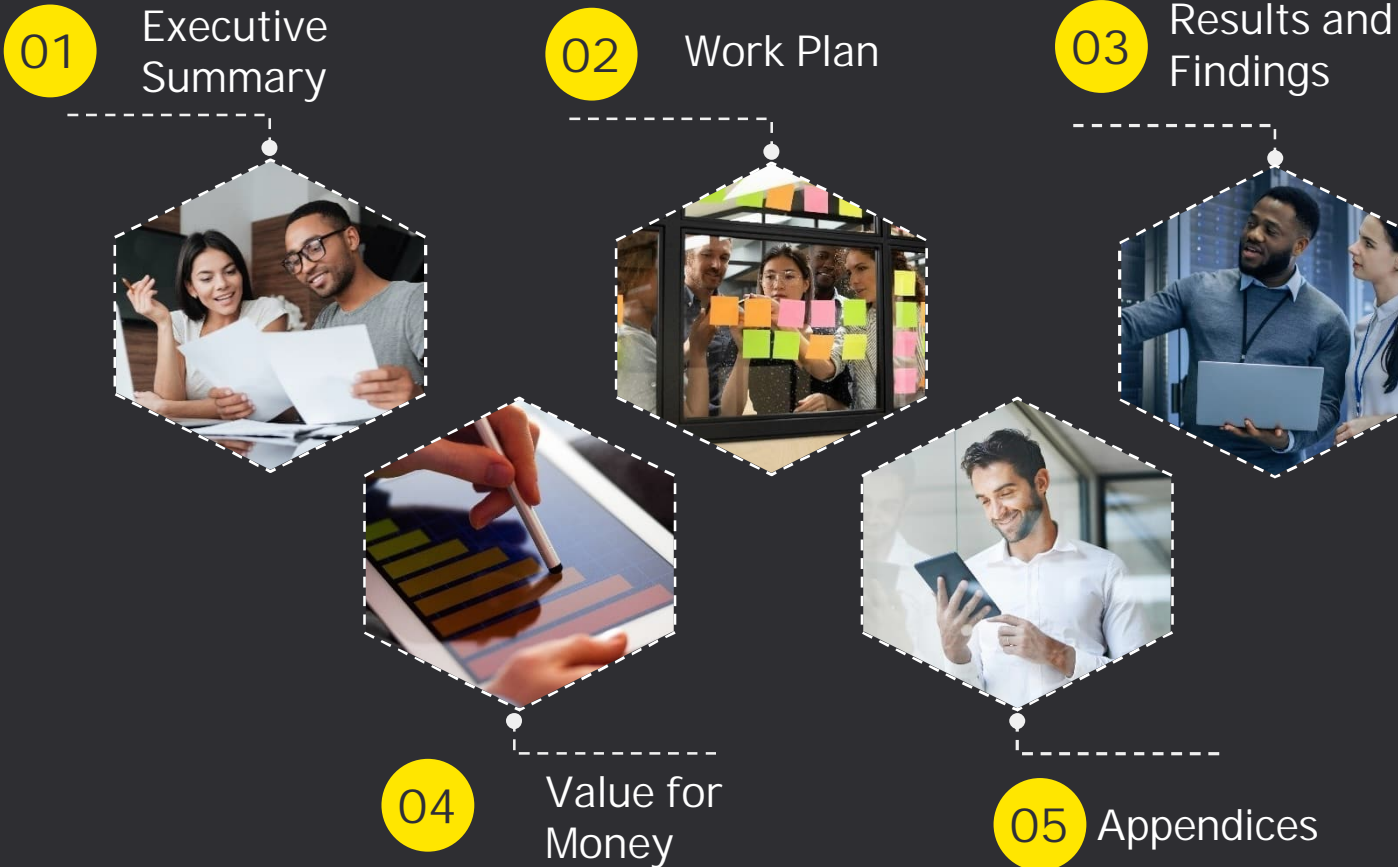
Stephen Reid

Partner

For and on behalf of Ernst & Young LLP

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Public Sector Audit Appointments Ltd (PSAA) issued the “Statement of responsibilities of auditors and audited bodies”. It is available from the PSAA website. The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The “Terms of Appointment and further guidance (updated July 2021)” issued by the PSAA (<https://www.psa.co.uk/managing-audit-quality/terms-of-appointment/terms-of-appointment-and-further-guidance-1-july-2021/>) sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and in legislation and covers matters of practice and procedure which are of a recurring nature.

This report is made solely to the Audit and Governance Committee and management of Arun District Council. Our work has been undertaken so that we might state to the Audit and Governance Committee and management of Arun District Council those matters we are required to state to them in this report and for no other purpose. To the fullest extent permitted by law we do not accept or assume responsibility to anyone other than the Audit and Governance Committee and management of Arun District Council for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.



# 01 Executive Summary



# Executive Summary – System wide context

Context for the audit – Department for Levelling-up, Housing and Communities (DLUHC) and Financial Reporting Council (FRC) measures to address local audit delays

Timely, high-quality financial reporting and audit of local bodies is a vital part of our democratic system. It supports good decision making by local bodies and ensures transparency and accountability to local taxpayers. There is general agreement that the backlog in the publication of audited financial statements by local bodies has grown to an unacceptable level and there is a clear recognition that all stakeholders in the sector need to work together to address this. Reasons for the backlog across the system have been widely reported and include:

- ▶ Lack of capacity within the local authority financial accounting professions
- ▶ Increased complexity of reporting requirements within the sector
- ▶ Lack of capacity within audit firms with public sector experience
- ▶ Increased regulatory pressure on auditors, which in turn has increased the scope and extent of audit procedures performed

DLUHC has worked collaboratively with the FRC, as incoming shadow system leader, and other system partners, to develop and implement measures to clear the backlog. Statutory Instrument (2024) No. 907 - “The Accounts and Audit (Amendment) Regulations 2024” (the SI), together with the updated NAO Code of Audit Practice 2024 and the Local Authority Reset and Recovery Implementation Guidance, have all been developed to ensure auditor compliance with International Standards on Auditing (UK) (ISAs (UK)), consist of three phases:

- ▶ Phase 1: Reset involving clearing the backlog of historic audit opinions up to and including financial year 2022/23 by 13 December 2024.
- ▶ Phase 2: Recovery from Phase 1 in a way that does not cause a recurrence of the backlog by using backstop dates to allow assurance to be rebuilt over multiple audit cycles.
- ▶ Phase 3: Reform involving addressing systemic challenges in the local audit system and embedding timely financial reporting and audit.

As a result of the system wide implementation of backstop dates we anticipate issuing a disclaimed audit opinion on the Council's 2022/23 financial statements. The proposed disclaimer of the Council's 2022/23 financial statements impacts the audit procedures that we have planned and undertaken to gain assurance on the 2022/23 financial statements and the form of the audit report.

## Local Background and Context

The Council has in general presented draft financial statements for audit within the regulatory timeframe in recent years. We note, however, that the Council published its draft 2022/23 financial statements for audit in July 2023, which was after the 31 May 2023 deadline as required by the Audit and Accounts regulations. We were unable to schedule the 2021/22 audit to meet the reporting timeline of 30 September 2022, and instead completed the audit in March 2024. We then were unable to perform the 2022/23 audit for the Council before the back stop date.



# Executive Summary – Local context

## Local Background and Context

The position at the Council has developed over the past few years resulting in unaudited financial statements for 31 March 2023.

The main reasons for the Council's financial statements not being prepared, audited and signed to date include:

- ▶ The post pandemic timelines resulted in audit teams trying to move delayed audits on to completion, whilst finance teams were trying to catch up, deal with current priorities and plan for the future. This used a significant amount of our finite audit resource, leading to a lack of capacity to move onto the 2022/23 audit year.
- ▶ In addition, there were a number of new technical issues and challenges to address during this period, including, accounting for infrastructure assets, taking into account the updated pension fund valuations, which led to delays to the 2021/22 audit being completed.



# Executive Summary – Report structure and work completed

## Report structure and work completed

This report covers the work we have completed to meet the requirements of the International Standards on Auditing (UK&I), (ISAs) and the Local Audit Reset and Recovery Implementation Guidance (LARRIGs) along with the National Audit Office Value for Money Code (NAO VFM Code). It has been split into the following sections:

Section 1 – Executive Summary – this sets out the national and local context and the structure of our report.

Section 2 – Work Plan – we have completed the following planning tasks:

- ▶ Completed required independence procedures.
- ▶ Set a level of materiality.
- ▶ Issued letters of inquiry to Management, Those Charged with Governance, the Head of Internal Audit and the Monitoring Officer.
- ▶ Updated our understanding of the business, including review of responses to inquiry letters, internal team meeting, minute review, etc.
- ▶ Identified significant, inherent and other areas of higher risk or focus.
- ▶ Considered any other matters that may require reporting to regulators, or which may result in a modification to the audit report e.g. Non-compliance with laws and regulations, (Noclar), Objections, Significant weaknesses in arrangements for vfm, any matters that may result in the use of the auditor's powers etc.

Section 3 – Results and findings - Work completed to issue the disclaimer, findings and results:

- ▶ Review of the financial statements.
- ▶ Consideration of any matters that came to light during our planning and review procedures in relation to laws and regulations, fraud, related parties, litigation and claims, significant changes to contracts and systems, service organisations, and report as appropriate.
- ▶ Reporting on any other matters that may require the use of the auditor's powers, formal reporting or a modification to the auditor's report e.g. Non-compliance with laws and regulations, (Noclar), Objections, Significant weaknesses in arrangements for vfm, etc.

Section 4 – Value for money reporting

- ▶ The value for money report to 31 March 2023.

Section 5 - Appendices





# 02 Work Plan

# Work Plan – Audit Scope

## Audit scope

This Completion report covers the work that we performed in relation to:

- ▶ Our audit opinion on whether the financial statements of the Council give a true and fair view of the financial position as at 31 March 2023 and of the income and expenditure for the year then ended; and
- ▶ Our commentary on your arrangements to secure value for money in your use of resources for the relevant period. We include further details on VFM in Section 4.

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on the Council's Whole of Government Accounts return.

Our audit will also include the mandatory procedures that we are required to perform in accordance with applicable laws and auditing standards.

When planning the audit we consider several key inputs:

- ▶ Strategic, operational and financial risks relevant to the financial statements;
- ▶ Developments in financial reporting and auditing standards;
- ▶ The quality of systems and processes;
- ▶ Changes in the business and regulatory environment; and
- ▶ Management's views on all of the above.

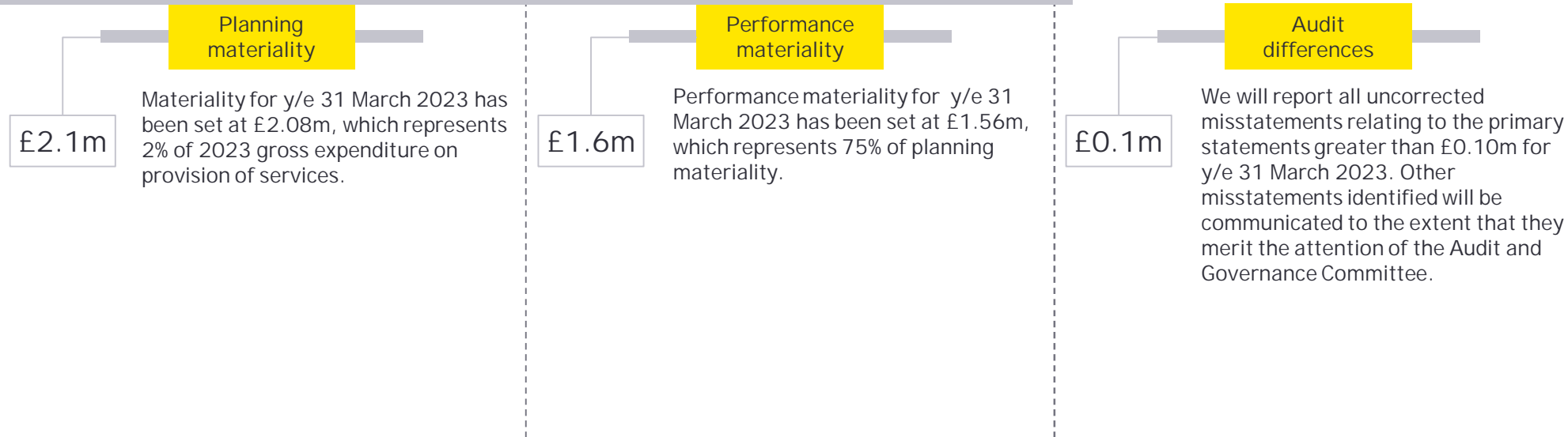
Given that Statutory Instrument (2024) No. 907 - The Accounts and Audit (Amendment) Regulations 2024 imposes a backstop date of the 13 December 2024 by which date we are required to issue our opinion on the financial statements, we have considered whether the time constraints imposed by the backstop date mean that we cannot complete all necessary procedures to obtain sufficient, appropriate audit evidence to support the opinion and fulfil all the objectives of all relevant ISAs (UK). This decision is in line with ISA 200: Failure to Achieve an Objective 24.

If an objective in a relevant ISA (UK) cannot be achieved, the auditor shall evaluate whether this prevents the auditor from achieving the overall objectives of the auditor and thereby requires the auditor, in accordance with the ISAs (UK), to modify the auditor's opinion or withdraw from the engagement (where withdrawal is possible under applicable law or regulation). Failure to achieve an objective represents a significant matter requiring documentation in accordance with ISA (UK) 230 (Revised June 2016).4 (Ref: Para. A77&A78)

Taking the above into account, for the year ended 31 March 2023 we have determined that we cannot meet the objectives of the ISAs (UK) and we anticipate issuing a disclaimed audit report.

# Work Plan - Materiality

## Materiality



To ascertain the significance of issues in the draft financial statements we have set materiality based on the 2021/22 audit year. We have considered updating this materiality for any key changes or known factors from that year of which there were none. We determined that our audit procedures would be performed using a materiality of £2.08m. This level of materiality remains appropriate for the actual results for the financial year.

These levels are being used to assess our response to any issues identified in the Council's financial statements.

# Work Plan – Significant, inherent and other risk areas

The following ‘dashboard’ summarises the significant accounting and auditing matters identified as part of our planning work. It seeks to provide Those Charged with Governance with an overview of our initial risk identification for the year.

## Audit risks and areas of focus

| Risk/area of focus   | Applicable year | Risk identified | Change from PY              | Details   |
|--|-----------------|-----------------|-----------------------------|---|
| Pension Liability Valuation  | 31 March 2023   | Inherent risk   | No change in risk or focus. | <p>The Local Authority Accounting Code of Practice and IAS 19 require the Council to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by West Sussex County Council.</p> <p>The Council's pension fund asset is a material estimated balance, and the Code requires that this asset be disclosed on the Council's balance sheet. The information disclosed is based on the IAS 19 report issued to the Council by the actuary to the County Council.</p> <p>Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.</p> |
| Risk of fraud in revenue recognition – inappropriate capitalisation of revenue expenditure | 31 March 2023   | Fraud risk      | No change in risk or focus  | <p>Under ISA 240 there is a presumed risk that revenue may be misstated due to improper revenue recognition.</p> <p>In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.</p> <p>Our judgement is the significant risk at the Council relates to the improper capitalisation of revenue expenditure.</p>   |
| Valuation of Land and Buildings  | 31 March 2023   | Inherent risk   | No change in risk or focus  | <p>Property, Plant and Equipment Land and Buildings (L&amp;B) represent significant balances in the Council's financial statements and are subject to valuation changes, impairment reviews and depreciation charges.</p> <p>Management is required to make material judgements and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.</p>   |

# Work Plan - Independence

The FRC Ethical Standard 2019 and ISA (UK) 260 'Communication of audit matters with those charged with governance', requires us to communicate with you on a timely basis on all significant facts and matters that bear upon our integrity, objectivity and independence. The Ethical Standard, as revised in December 2019, requires that we communicate formally both at the planning stage and at the conclusion of the audit, as well as during the course of the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

## Required communications

### Planning stage

- ▶ The principal threats, if any, to objectivity and independence identified by Ernst & Young (EY) including consideration of all relationships between you, your affiliates and directors and us;
- ▶ The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality review;
- ▶ The overall assessment of threats and safeguards;
- ▶ Information about the general policies and process within EY to maintain objectivity and independence.

### Final stage

- ▶ In order for you to assess the integrity, objectivity and independence of the firm and each covered person, we are required to provide a written disclosure of relationships (including the provision of non-audit services) that may bear on our integrity, objectivity and independence. This is required to have regard to relationships with the entity, its directors and senior management, its affiliates, and its connected parties and the threats to integrity or objectivity, including those that could compromise independence that these create. We are also required to disclose any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed;
- ▶ Details of non-audit/additional services provided and the fees charged in relation thereto;
- ▶ Written confirmation that the firm and each covered person is independent and, if applicable, that any non-EY firms used in the group audit or external experts used have confirmed their independence to us;
- ▶ Details of any non-audit/additional services to a UK PIE audit client where there are differences of professional opinion concerning the engagement between the Ethics Partner and Engagement Partner and where the final conclusion differs from the professional opinion of the Ethics Partner
- ▶ Details of any inconsistencies between FRC Ethical Standard and your policy for the supply of non-audit services by EY and any apparent breach of that policy;
- ▶ Details of all breaches of the IESBA Code of Ethics, the FRC Ethical Standard and professional standards, and of any safeguards applied and actions taken by EY to address any threats to independence; and
- ▶ An opportunity to discuss auditor independence issues.

In addition, during the course of the audit, we are required to communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place, for example, when accepting an engagement to provide non-audit services.

We ensure that the total amount of fees that EY and our network firms have charged to you and your affiliates for the provision of services during the reporting period, analysed in appropriate categories, are disclosed.

# Work Plan - Independence

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including the principal threats, if any. We have adopted the safeguards noted below to mitigate these threats along with the reasons why they are considered to be effective. However, we will only perform non-audit services if the service has been pre-approved in accordance with your policy.

## Overall Assessment

Overall, we consider that the safeguards that have been adopted appropriately mitigate the principal threats identified and we therefore confirm that EY is independent and the objectivity and independence of Stephen Reid, your audit engagement partner and the audit engagement team have not been compromised.

## Self-interest threats

A self-interest threat arises when EY has financial or other interests in your organisation. Examples include where we have an investment in your company; where we receive significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with you. At the time of writing, there are no long outstanding fees.

We believe that it is appropriate for us to undertake those permitted non-audit/additional services set out in Section 5.40 of the FRC Ethical Standard 2019 (FRC ES), and we will comply with the policies that you have approved.

None of the services are prohibited under the FRC's ES and the services have been approved in accordance with your policy on pre-approval. In addition, when the ratio of non-audit fees to audit fees exceeds 1:1, we are required to discuss this with our Ethics Partner, as set out by the FRC ES, and if necessary, agree additional safeguards or not accept the non-audit engagement. We will also discuss this with you. For accounting period ended 31 March 2023 non-audit fees subject to the fee cap cannot exceed 70% of the average audit fees for the past three years. We are engaged by the Council as a reporting accountant for the Housing Benefit Assurance Process (HBAP). At the time of writing, we expect the current ratio of non-audit fees to audit fees to be approximately 1:1. We have adopted the following safeguards as a result.

| Description of relationship                                       | Related independence threat | Safeguards adopted and reasons considered to be effective   |
|---|-----------------------------|---|
| We are engaged by the Council as a reporting accountant for HBAP. | Self-Interest               | The service is permissible under the NAO's Auditor Guidance Note 01. because this service is required by the awarding central government department   |
|   | Self-review                 | The results of the AUP testing is not reflected in the amounts included/disclosed in the financial statements. The external audit conclusion is not reliant upon the conclusion of our AUP engagement. No advice will be given in relation to accounting treatment. |

A self-interest threat may also arise if members of our audit engagement team have objectives or are rewarded in relation to sales of non-audit services to you. We confirm that no member of our audit engagement team, including those from other service lines, has objectives or is rewarded in relation to sales to you, in compliance with Ethical Standard part 4.

There are no other self-interest threats at the date of this report.



# Work Plan - Independence

## Self-review threats

Self-review threats arise when the results of a non-audit service performed by EY or others within the EY network are reflected in the amounts included or disclosed in the financial statements.

The table on the previous page sets out the self-review threats that exist as the date of this report in respect of our engagement by the Council as a reporting accountant for the Housing Benefit Assurance Process (HBAP), together with a description of the safeguards we have adopted as a result of this.

## Management threats

Partners and employees of EY are prohibited from taking decisions on behalf of management of your company. Management threats may also arise during the provision of a non-audit service in relation to which management is required to make judgements or decision based on that work.

There are no management threats at the date of this report.

## Other threats

Other threats, such as advocacy, familiarity or intimidation, may arise.

There are no other threats at the date of this report.



## 03 Results and findings





# Results and findings

## Status of the audit

The following items relating to the completion of our audit procedures were outstanding at the date of this report.

- ▶ Completion of subsequent events procedures;
- ▶ Receipt of a signed management representation letter

Given that the audit process is still ongoing, we will continue to consider existing and new information which could influence our final audit opinion.

## Value for Money

Our value for money (VFM) work is complete and reported in Section 4 of this report. We had identified no risks of significant weaknesses in arrangements. Having updated and completed the planned procedures in these areas we did not identify a significant weakness. See Section 4 of the report for further details.

## Audit differences

We identified no differences.

## Other Reporting Issues

We have reviewed the information presented in the Annual Governance Statement for consistency with our knowledge of the Council. We have no matters to report as a result of this work.

The Comptroller and Auditor General has confirmed that he plans to issue his opinion and certificate on the 2022-23 Whole of Government Accounts on 22 November 2024. Given we expect to issue our 2022/23 audit report after that date but before the statutory backstop of 13 December 2024, we therefore expect to be able to certify completion of the audit as part of our final 2022/23 audit report.



# Results and findings

## Areas of audit focus

We identified a number of key areas of focus for our audit of the financial report the Council. We concluded we would disclaim the audit and therefore have not completed detailed audit testing on these areas but instead have reported any matters that came to light from the work we did complete.

There are no matters, other than those reported by management or disclosed in this report, which we believe should be brought to the attention of the Audit and Governance Committee.

## Control observations

During the audit, we identified no significant deficiencies in internal control

## Independence

Further to our review of independence we have not identified any issues to bring to your attention..

## Other matters

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Council's financial reporting process. They include the following:

- ▶ Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- ▶ Any significant difficulties encountered during the audit;
- ▶ Any significant matters arising from the audit that were discussed with management;
- ▶ Written representations we have requested;
- ▶ Expected modifications to the audit report;
- ▶ Any other matters significant to overseeing the financial reporting process;
- ▶ Findings and issues around the opening balance on initial audits (if applicable);
- ▶ Related parties;
- ▶ External confirmations;
- ▶ Going concern; and
- ▶ Consideration of laws and regulations.

We have no other matters to report

# Results and findings - Audit Report

Draft audit report

Draft disclaimed audit report

Our opinion on the financial statements

## INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ARUN DISTRICT COUNCIL

### Disclaimer of opinion

We were engaged to audit the financial statements of Arun District Council for the year ended 31 March 2023. The financial statements comprise the:

- Comprehensive Income and Expenditure Statement,
- Movement in Reserves Statement,
- Balance Sheet,
- Cash Flow Statement,
- the related notes 1 to 41 including a summary of significant accounting policies and including the Expenditure and Funding Analysis on page 14,
- Housing Revenue Account Income and Expenditure Statement, the Movement on the Housing Revenue Account Statement, and the related notes,
- Collection Fund and the related notes.

The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022).

We do not express an opinion on the accompanying financial statements of the Council. Because of the significance of the matter described in the basis for disclaimer of opinion section of our report, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on these financial statements.

### Basis for disclaimer of opinion

The Accounts and Audit (Amendment) Regulations 2024 (Statutory Instrument 2024/907) which came into force on 30 September 2024 requires the accountability statements for this financial year to be approved not later than 13th December 2024.

We completed the audit of the 2021/22 financial statements in March 2024 and issued our audit opinion on 25 March 2024.

The backstop date and the wider requirements of the local audit system reset, meant we did not have the required resources available to complete the detailed audit procedures that would be needed to obtain sufficient appropriate audit evidence to issue an unmodified audit report on the 2022/23 financial statements. Therefore, we are disclaiming our opinion on the financial statements.

### Matters on which we report by exception

Notwithstanding our disclaimer of opinion on the financial statements, performed subject to the pervasive limitation described above, we have nothing to report in respect of whether the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Council.

### We report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 (as amended)
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014 (as amended)
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 (as amended)

# Results and findings - Audit Report

Draft audit report

Draft disclaimed audit report

Our opinion on the financial statements

- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 (as amended)
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014 (as amended)
- we are not satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2023.

We have nothing to report in these respects.

Responsibility of the Group Head of Finance and Section 151 Officer

As explained more fully in the Statement of the Group Head of Finance and Section 151 Officer's Responsibilities set out on page 13, the Group Head of Finance and Section 151 Officer is responsible for the preparation of the Annual Statement of Accounts, which includes the financial statements in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022), and for being satisfied that they give a true and fair view and for such internal control as the Group Head of Finance and Section 151 Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Group Head of Finance and Section 151 Officer is responsible for assessing the Council's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Council either intends to cease operations, or has no realistic alternative but to do so.

The Council is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

Auditor's responsibilities for the audit of the financial statements

Our responsibility is to conduct an audit of the Council's financial statements in accordance with International Standards on Auditing (UK) and to issue an auditor's report.

However, because of the matter described in the basis for disclaimer of opinion section of our report, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on these financial statements.

We are independent of the Council in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard and the Code of Audit Practice 2024 and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Scope of the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We have undertaken our review in accordance with the Code of Audit Practice 2024, having regard to the guidance on the specified reporting criteria issued by the Comptroller and Auditor General in January 2023, as to whether Arun District Council had proper arrangements for financial sustainability, governance and improving economy, efficiency and effectiveness. The Comptroller and Auditor General determined these criteria as those necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether Arun District Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2023.

# Results and findings - Audit Report

Draft audit report

Draft disclaimed audit report

Our opinion on the financial statements

We planned our work in accordance with the Code of Audit Practice. Based on our risk assessment, we undertook such work as we considered necessary to form a view on whether, in all significant respects, Arun District Council had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 (as amended) to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.


We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

Certificate

We certify that we have completed the audit of the accounts of Arun District Council in accordance with the requirements of the Local Audit and Accountability Act 2014 (as amended) and the Code of Audit Practice issued by the National Audit Office.



# 04 Value for Money



# VFM - Executive Summary

## Purpose

Auditors are required to be satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We do not issue a 'conclusion' or 'opinion', but where significant weaknesses are identified we will report by exception in the auditor's opinion on the financial statements. In addition, auditors provide an annual commentary on arrangements published as part of the Auditor's Annual Report. In doing so, we comply with the requirements of the 2020 Code of Audit Practice (the Code) and Auditor Guidance Note 3 (AGN 03).

The purpose of this interim commentary is to explain the work we have undertaken during the year ended 31 March 2023 and highlight any significant weaknesses identified along with recommendations for improvement. The commentary covers our interim findings for audit year 2022/23. The NAO has confirmed that where VFM reporting is outstanding for more than one year, the auditor can issue one report covering all years.

We are continuing to report VFM in line with our responsibilities as set out in the 2020 Code to ensure a smooth transition to the 2023/24 audit year when auditors are required to meet the full Code reporting responsibilities.

The section sets out the following areas which have been assessed up to the point of issuing this report:

- ▶ Any identified risks of significant weakness, having regard to the three specified reporting criteria;
- ▶ An explanation of the planned responsive audit procedures to the significant risks identified;
- ▶ Findings to date from our planned procedures; and
- ▶ Our commentary over your arrangements for the year 2022/23.



# VFM - Executive Summary (continued)

## Risks of Significant Weakness

In undertaking our procedures to understand the body's arrangements against the specified reporting criteria, we identify whether there are risks of significant weakness which require us to complete additional risk-based procedures. AGN 03 sets out considerations for auditors in completing and documenting their work and includes consideration of:

- ▶ our cumulative audit knowledge and experience as your auditor;
- ▶ reports from internal audit which may provide an indication of arrangements that are not operating effectively;
- ▶ our review of Council committee reports;
- ▶ meetings with the Group Head of Finance and S151 Officer, Interim Financial Services Manager and Deputy S151 Officer and Group Accountant;
- ▶ information from external sources; and
- ▶ evaluation of associated documentation through our regular engagement with Council management and the finance team.

We completed our risk assessment procedures and did not identify any risks of significant weaknesses in the Council's VFM arrangements.



# VFM - Executive Summary (continued)

## Reporting

Our commentary for 2022/23 and is set out over pages 26 to 30, and is unchanged from our interim VFM report issued in May 2024.

The commentary on these pages summarises our understanding of the arrangements at the Council based on our evaluation of the evidence obtained in relation to the three reporting criteria (see table below) throughout 2022/23, including related recommendations raised and accepted by management in our interim VFM report.

In accordance with the NAO's 2020 Code of Audit Practice, we are required to report a commentary against the three specified reporting criteria. The table below sets out the three reporting criteria, whether we identified a risk of significant weakness as part of our planning procedures, and whether we have concluded that there is a significant weakness in the Council's arrangements.

| Reporting Criteria  | Risks of significant weaknesses in arrangements identified? | Actual significant weaknesses in arrangements identified? |
|---|---|---|
| Financial sustainability: How the Council plans and manages its resources to ensure it can continue to deliver its services   | No significant risks identified                             | No significant weakness identified                        |
| Governance: How the Council ensures that it makes informed decisions and properly manages its risks   | No significant risks identified                             | No significant weakness identified                        |
| Improving economy, efficiency and effectiveness: How the Council uses information about its costs and performance to improve the way it manages and delivers its services | No significant risks identified                             | No significant weakness identified                        |

# Value for Money Commentary

Financial Sustainability: How the Council plans and manages its resources to ensure it can continue to deliver its services

No significant weakness identified

The budget for 2023/24 was set based on the assumptions included in the Medium-Term Financial Prospects (MTFP). This budget was balanced through the use of £5 million from revenue reserves, including a net draw down of £1.2 million for planned specific purposes and a further £3.8 million from the Funding Resilience Reserve to cover a general deficit in the General Fund balance. In 2021/2, it was decided that the Council would reduce their General Fund Reserve to a minimum of £5 million, transferring £2.1 million to the Funding Resilience Reserve to fund future budget gaps identified within the MTFP. As at 31 March 2023, the General Fund remained at £5 million, with the in-year underspend of £1.7 million transferred to the Funding Resilience Reserve. Excluding the General Fund Reserve and Financial Resilience Reserve, the Council had other usable reserves of £18.8 million, of which £10 million was earmarked to meet specific liabilities when they fall due. The use of reserves to bridge the funding gap is possible in the short-term but is not a sustainable solution to achieving financial balance. The Council will need to identify further savings and additional funding sources in order to achieve a sustainable financial position.

We confirmed that the Council did not prepare a savings strategy as part of its 2022/23 or 2023/24 budget and Medium-Term Financial Prospects. The reason for this is that the Council calculate the overall budget gap for each financial year within the MTFP and agreed it would be the responsibility of individual departments to manage their share of the budget gap for the year (through identification of savings / efficiencies specific to their area). However, for 2024/25 budget planning the Council is now looking into developing a high-level savings plan with the details being reported through to service committees to bridge the future funding gaps identified. As part of this process, Group Heads were asked to set out how their net service budgets could be reduced by 10% or 20%, including providing suggestions for service delivery which would have a positive impact on Council finances. Where savings identified could be implemented immediately, the Council put these into action. This included deleting budgeted vacant posts which did not have service implications. The Council has identified £2.1 million of savings to be achieved during 2024/25, with a further £0.5 million subject to consultation with staff. The Council recognises that as such a savings programme is new, and is still in early stages of development, more work is required to investigate several of the proposals further and determine the true scale of any savings.

Financial performance against budget is reviewed annually within the Revenue and Capital Outturn reports by the Policy and Finance Committee. As at May 2024, we noted that the report for 2022/23 had not yet been presented to the Policy and Finance Committee. The report was ultimately presented to the Policy and Finance Committee at their next meeting in July 2024.

# Value for Money Commentary

Financial Sustainability: How the Council plans and manages its resources to ensure it can continue to deliver its services (continued)

No significant weakness identified

Total capital expenditure planned for 2022/23 was £30.1 million (including £17.8 million in relation to carried forward projects from 2021/22). Actual expenditure was only £13.8 million, with the majority of the remaining balance slipping into 2023/24. This was largely due to considerable and sustained disruption to the supply chain and delivery of goods which has led to delays in the completion of planned projects. In addition, the increased costs of materials and labour caused by inflation and the cost-of-living crisis has exacerbated these issues. While there are significant delays with the capital projects, we note that this is being monitored by the Council.

Although we have not identified any matters regarding the review and challenge of the in-year Budget Monitoring Reports and we have not identified an issue in relation to the Council's budget monitoring process, in order for the Council to be able to accurately monitor its budgets, the Council need to prepare and review the Revenue and Capital Outturn Report in a timelier manner.

*Conclusion: Based on the work performed, the Council had proper arrangements in place in 2022/23 to enable it to plan and manage its resources to ensure that it can continue to deliver its services*

Recommendation: In order for the Council to be able to accurately monitor its budgets, the Council should prepare and review the Revenue and Capital Outturn Report in a timelier manner.

Recommendation: The Council are using reserves to bridge the funding gap in the short-term. This is not a sustainable solution to achieving financial balance and the Council need to develop a savings plan and/or additional funding sources in order to achieve a sustainable financial position.

# Value for Money Commentary (continued)

Governance: How the Council ensures that it makes informed decisions and properly manages its risks

No significant weakness identified

We reviewed draft Annual Governance Statement (AGS) for the period 2022/23 and confirmed the effectiveness of the system of internal controls and maintenance of effective financial management system. This includes the Council's own review of their governance arrangements and risks to these arrangements. Further, we reviewed the Council's governance improvement areas as set out in the AGS, noting that two items were cleared from the 2021/22 AGS, but 10 issues remained (4 new and 6 existing). The AGS shows clearly the mitigating actions to be taken against each of these points, along with a responsible officer and a target date for completion of the action points.

From 1 April 2022, Internal Audit services were provided to the Council by the Southern Internal Audit Partnership (SIAP), hosted by Hampshire County Council. Previously internal audit had been provided in-house. The Internal Audit service provides a continuous and independent review of all internal control systems. It objectively examines, evaluates and reports upon the adequacy of such internal controls. Where deficiencies in governance arrangements are identified they are reported in the Council's Annual Governance Statement. This includes concerns raised by external inspectorates, external audit and any limited assurance audit reports which are issued by Internal Audit.

The internal audit plan is usually presented prior to the start of each financial year. However, as SIAP was not formally appointed until 1 April 2022, the plan could not be drafted and presented before the start of the year. Therefore, at the February 2022 meeting, the Audit and Governance Committee members granted delegated authority to the Interim Group Head of Corporate Support and Section 151 Officer to agree the Plan with SIAP and report it retrospectively to the Audit and Governance Committee.

Overall, SIAP gave the Council a 'Reasonable Assurance' opinion for 2022/23. This was supported by 12 of the 16 reviews by SIAP being given 'Substantial' or 'Reasonable' assurance. In relation to the 4 Limited Assurance Opinions, we reviewed the findings, noting that internal audit agreed with management that appropriate corrective actions and a timescale for improvement with responsible managers was agreed. Particularly in relation to Governance, Internal Audit stated: "Based on the work completed during the year and observations through our attendance at a variety of management and governance meetings, in our opinion the governance frameworks in place across the Council are robust, fit for purpose and subject to regular review. There is also appropriate reporting to the Audit and Governance Committee to provide the opportunity for independent consideration and challenge including the Annual Governance Statement.

# Value for Money Commentary (continued)

Governance: How the Council ensures that it makes informed decisions and properly manages its risks

No significant weakness identified

The Council updated their Risk Management Framework in November 2022. This framework was developed to enable a full review of the risks faced by the Council in achieving the objectives outlined in the Council's Vision 2022-26. This is through focus on providing the risk management principles, tools, techniques, advice, and support to the Council to be able to manage the risks and opportunities associated with the delivery of its services in its endeavour to continue applying high standards of governance, being efficient, effective, transparent, and accountable. The framework recognizes that it is impossible to remove all risk, but effective practicable risk management will help to ensure that the Council has the correct level of control to provide sufficient protection from risks whilst maximising its opportunities.

The new Risk Management Framework was used to review the strategic risks faced by the Council and formulate a new Corporate Risk Register which was presented at the November 2022 Audit and Governance Committee. Each of the identified risks are disaggregated into their specific causes and effects, with associated existing controls / mitigating actions which contribute to reducing the overall risk score. Additionally, each risk has further actions which are to be implemented / monitored by the Council and there is a risk owner for each risk who provides updates on the status of the risk.

The framework was updated again in August 2023 and approved by the Audit and Governance Committee in September 2023. The main changes to the framework were related to the frequency of review of risks based on level (high, medium, low). In addition, risk entries on the Corporate Risk Register will now be identified, owned and reviewed by the Corporate Management Team and Group Heads.

The Council published their draft 2022/23 financial statements for audit in July 2023, which was after the 31 May 2023 deadline as required by the Audit and Accounts regulations. The Council advertised and held an inspection period for members of the public in line with these regulations. We confirm that the 2022/23 draft financial statements were arithmetically correct, agreed to the data in the general ledger, and prepared materially in line with the content required by the CIPFA Code. The Council has carried out bank reconciliations during the year. Therefore, based on the work completed appropriate arrangements for financial reporting were in place during 2022/23.

Conclusion: Based on the work performed, the Council had proper arrangements in place in 2022/23 to make informed decisions and properly manage its risks.

# Value for Money Commentary (continued)

Improving economy, efficiency and effectiveness: How the Council uses information about its costs and performance to improve the way it manages and delivers its services

No significant weakness identified

The Council monitor both the General Fund and Housing Revenue Account spend against budget through quarterly monitoring reports presented to the Policy and Finance Committee. In addition, the Council produce a year end Revenue and Capital Outturn report which summarises the financial activity during the year. As documented under financial resilience narrative, we raised a recommendation for the Council to produce this report in a timelier manner, as a significant amount of time has passed between the financial year end and presentation of the outturn to the committee.

The Council updated their Corporate Plan (Vision 2022-2026) following the 2023 local council election. The plan is centred around the below 4 themes:

- ▶ Improving the wellbeing of Arun
- ▶ Delivering the right homes in the right places
- ▶ Supporting our environment to support us
- ▶ Fulfilling Arun's economic potential

The medium-term Financial Prospects has regard to the corporate plan, therefore, ensuring the consistency of financial strategy with the corporate strategy. The key performance indicators re the strategic direction are measured all through the year, either quarterly, half yearly or annually. These are posted on the website during the year after they have been reviewed at the Policy and Finance Committee.

In August 2018, the Council received a Regulatory Notice published by the Regulator for Social Housing (RSH) in August 2018. Since publication, the Council has developed an action plan with the RSH which has been monitored monthly. Their efforts have resulted in the Regulatory Notice being withdrawn from July 2023.

Internal Audit performed a review of Procurement during 2022/23, giving a Limited Assurance Opinion in this area following issues identified in their work. However, we are aware that Internal Audit agreed appropriate corrective actions and a timescale for improvement with the responsible members of management. As of September 2023, 5 out of the agreed 7 management actions were complete, based on an Internal Audit update report.

*Conclusion: Based on the work performed, the Council had proper arrangements in place in 2022/23 to use information about its costs and performance to improve the way it manages and delivers its services.*



# 05 Appendices

# Appendix A – Management representation letter

## Management representation letter

Draft management representation letter to be reviewed and tailored by management.

## Management Rep Letter

This letter of representations is provided connection with your audit of the Authority financial statements of Arun District Council (“the Authority”) for the year ended 31 March 2023. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the consolidated and parent Authority financial statements give a true and fair view of the authority financial position of Arun District Council as of 31 March 2023 and of its financial performance (or operations) and its cash flows for the year then ended in accordance with, for the Authority, CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

We understand that the purpose of your audit of our Authority financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing (UK), which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist. Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

### A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with, for the Authority, the Accounts and Audit Regulations 2015 and the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
2. We acknowledge, as members of management of the Authority, our responsibility for the fair presentation of the consolidated and parent Authority financial statements. We believe the Authority financial statements referred to above give a true and fair view of the financial position, financial performance and cash flows of the Authority in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)), and are free of material misstatements, including omissions. We have approved the financial statements.
3. The significant accounting policies adopted in the preparation of the Authority financial statements are appropriately described in the Authority financial statements.
4. As members of management of the Authority, we believe that the Authority has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022) for the Authority that are free from material misstatement, whether due to fraud or error.



# Appendix A – Management representation letter

## Management representation letter

Draft management representation letter to be reviewed and tailored by management.

## Management Rep Letter

5. The comparative amounts have been restated to reflect the below matters and appropriate note disclosure of these restatements have also been included in the current year's Authority financial statements.

### Capital grants receipts in advance

The audit of the 2021/22 financial statements identified that the accounting treatment for certain capital contributions as receipts in advance was incorrect. Consequently, 2021/22 comparatives have been re-stated to correctly account for this income as capital grants unapplied. A summary of the re-statement of the entries within the Authority financial statements has been set out at Note 41. Supporting notes to the primary statements have also been re-stated accordingly.

There have been no significant errors or misstatements, or changes in accounting policies, other than the matters described above, that would require a restatement of the comparative amounts in the current year's consolidated and parent Authority financial statements. Other differences in the amounts shown as comparative amounts from the amounts in the Authority financial statements for the year ended 31 March 2023 are solely the result of reclassifications for comparative purposes.

6. We confirm the Authority does not have securities (debt or equity) listed on a recognized exchange.

7. We have confirmed to you any changes in service organizations within the authority since the last audited financial year.

### **Non-compliance with laws and regulations, including fraud**

1. We acknowledge that we are responsible to determine that the Authority's business activities are conducted in accordance with laws and regulations and that we are responsible to identify and address any non-compliance with applicable laws or regulations, including fraud.
2. We acknowledge that we are responsible for the design, implementation and maintenance of a system of internal control to prevent and detect fraud and that we believe we have appropriately fulfilled those responsibilities.
3. We have disclosed to you the results of our assessment of the risk that the Authority financial statements may be materially misstated as a result of fraud.
4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud, that may have affected the Authority (regardless of the source or form and including without limitation, any allegations by "whistleblowers"), including non-compliance matters:
  - Involving financial improprieties
  - Related to laws or regulations that have a direct effect on the determination of material amounts and disclosures in the Authority financial statements
  - Related to laws or regulations that have an indirect effect on amounts and disclosures in the Authority financial statements, but compliance with which may be fundamental to the operations of the Authority's business, its ability to continue in business, or to avoid material penalties
  - Involving management, or employees who have significant roles in internal control, or others
  - In relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

# Appendix A – Management representation letter

## Management representation letter

Draft management representation letter to be reviewed and tailored by management.

## Management Rep Letter

### **C. Information Provided and Completeness of Information and Transactions**

1. We have provided you with:

- Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- Additional information that you have requested from us for the purpose of the audit; and
- Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.

2. All material transactions have been recorded in the accounting records and are reflected in the Authority financial statements.

3. We have made available to you all minutes of the meetings of shareholders, directors and committees of directors (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through 2022/23 to the most recent meeting of the Audit and Governance Committee on 3 December 2024.

4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Authority's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the period ended 31 March 2023. These transactions have been appropriately accounted for and disclosed in the Authority financial statements.

5. We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022).

6. We have disclosed to you, and the Authority has complied with, all aspects of contractual agreements that could have a material effect on the Authority financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.

7. From the date of our last management representation letter through the date of this letter we have disclosed to you, to the extent that we are aware, any (1) unauthorized access to our information technology systems that either occurred or is reasonably likely to have occurred, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants), to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material effect on the Authority financial statements, in each case or in the aggregate, and (2) ransomware attacks when we paid or are contemplating paying a ransom, regardless of the amount.

8. We have disclosed to you, and provided you full access to information and any internal investigations relating to, unauthorized access to our information technology systems that has a material effect on the Authority financial statements, including disclosures.

# Appendix A – Management representation letter

## Management representation letter

Draft management representation letter to be reviewed and tailored by management.

## Management Rep Letter

### **D. Liabilities and Contingencies**

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the Authority financial statements.
2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
3. We have recorded and/or disclosed, as appropriate, all liabilities related to litigation and claims, both actual and contingent, and have disclosed in Note 39 to the consolidated and parent Authority financial statements all guarantees that we have given to third parties.

### **E. Going Concern**

1. Note 40 to the Authority financial statements discloses all the matters of which we are aware that are relevant to the Group and authority's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

### **F. Subsequent Events**

1. Other than the events described in Note 6 to the Authority financial statements, there have been no events subsequent to period end which require adjustment of or disclosure in the Authority financial statements or notes thereto.

### **G. Other information**

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the information contained within the Narrative Statement and also the Annual Governance Statement.

2. We confirm that the content contained within the other information is consistent with the financial statements.

### **H. Climate-related matters**

1. We confirm that to the best of our knowledge all information that is relevant to the recognition, measurement, presentation and disclosure of climate-related matters has been considered and the Authority have reflected these in the consolidated and parent financial statements.

# Appendix B – Fees

The duty to prescribe fees is a statutory function delegated to Public Sector Audit Appointments Ltd (PSAA) by the Secretary of State for Housing, Communities and Local Government.

This is defined as the fee required by auditors to meet statutory responsibilities under the Local Audit and Accountability Act 2014 in accordance with the requirements of the Code of Audit Practice and supporting guidance published by the National Audit Office, the financial reporting requirements set out in the Code of Practice on Local Authority Accounting published by CIPFA/LASAAC, and the professional standards applicable to auditors' work.

The original fees were based on the following assumptions:

- ▶ Officers meeting the agreed timetable of deliverables;
- ▶ Our opinion and value for money conclusion being unqualified;
- ▶ Appropriate quality of documentation is provided by the Council; and
- ▶ The Council has an effective control environment

The Council complies with PSAA's Statement of Responsibilities of auditors and audited bodies. See

<https://www.psa.co.uk/managing-audit-quality/statement-of-responsibilities-of-auditors-and-audited-bodies/statement-of-responsibilities-of-auditors-and-audited-bodies-from-2023-24-audits/>. In particular the Council should have regard to paragraphs 26 - 28 of the Statement of Responsibilities which clearly sets out what is expected of audited bodies in preparing their financial statements.

|   | Current Year     | Scale fee     | Prior Year       |
|---|------------------|---------------|------------------|
|   | £                | £             | £                |
| Total Fee – Code Work   | Tbc<br>Note 1    | 52,969        | 71,331           |
| <b>Total audit</b>  | <b>tbc</b>       | <b>52,969</b> | <b>71,331</b>    |
| Other non-audit services not covered above (reporting accountant for the Housing Benefit Assurance Process) | 46,000<br>Note 2 | N/A           | 32,875<br>Note 1 |
| <b>Total fees</b>   | <b>tbc</b>       | <b>52,969</b> | <b>tbc</b>       |

*All fees exclude VAT*

Note 1 - PSAA Ltd, in line with the joint statement issued DLUHC (as at that date) and the FRC is responsible for the determination of the final audit fee in respect of 2022/23. In doing so, PSAA Ltd will apply the principles that where auditors have worked in good faith to meet the requirements of the Code of Audit Practice in place at the time the work was conducted (and have reported on work that is no longer required), then they are due the appropriate fee for the work done, including where their procedures were necessary to conclude the audit by the legislatively imposed backstop date by way of a modified or disclaimed opinion and the body is due to pay the applicable fee.

Note 2 – The table shows our current estimate of the minimum 2022/23 and 2021/22 fee for HBAP work undertaken.

# Appendix C – Required communications with the Audit Committee

We have detailed the communications that we must provide to the audit committee.

## Our Reporting to you

| Required communications             | What is reported?   | When and where   |
|-------------------------------------|---|--|
| Terms of engagement                 | Confirmation by the audit committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.  | The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies. |
| Our responsibilities                | Reminder of our responsibilities as set out in the engagement letter  | The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies. |
| Planning and audit approach         | <p>Communication of:</p> <ul style="list-style-type: none"> <li>▶ The planned scope and timing of the audit</li> <li>▶ Any limitations on the planned work to be undertaken</li> <li>▶ The planned use of internal audit</li> <li>▶ The significant risks identified</li> </ul> <p>When communicating key audit matters this includes the most significant risks of material misstatement (whether or not due to fraud) including those that have the greatest effect on the overall audit strategy, the allocation of resources in the audit and directing the efforts of the engagement team</p>  | This Completion report for Those Charged with Governance   |
| Significant findings from the audit | <ul style="list-style-type: none"> <li>▶ Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>▶ Significant difficulties, if any, encountered during the audit</li> <li>▶ Significant matters, if any, arising from the audit that were discussed with management</li> <li>▶ Written representations that we are seeking</li> <li>▶ Expected modifications to the audit report</li> <li>▶ Other matters if any, significant to the oversight of the financial reporting process</li> <li>▶ Findings and issues regarding the opening balance on initial audits (delete if not an initial audit)</li> </ul> | This Completion report for Those Charged with Governance   |

# Appendix C – Required communications with the Audit Committee (cont'd)

## Our Reporting to you

| Required communications | What is reported?  | When and where   |
|-------------------------|--|--|
| Going concern           | <p>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</p> <ul style="list-style-type: none"> <li>▶ Whether the events or conditions constitute a material uncertainty</li> <li>▶ Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>▶ The adequacy of related disclosures in the financial statements</li> </ul>  | This Completion report for Those Charged with Governance |
| Misstatements           | <ul style="list-style-type: none"> <li>▶ Uncorrected misstatements and their effect on our audit opinion, unless prohibited by law or regulation</li> <li>▶ The effect of uncorrected misstatements related to prior periods</li> <li>▶ A request that any uncorrected misstatement be corrected</li> <li>▶ Material misstatements corrected by management</li> </ul>  | This Completion report for Those Charged with Governance |
| Fraud                   | <ul style="list-style-type: none"> <li>▶ Enquiries of the audit committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity</li> <li>▶ Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</li> <li>▶ Unless all of those charged with governance are involved in managing the entity, any identified or suspected fraud involving:               <ol style="list-style-type: none"> <li>a. Management;</li> <li>b. Employees who have significant roles in internal control; or</li> <li>c. Others where the fraud results in a material misstatement in the financial statements</li> </ol> </li> <li>▶ The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</li> <li>▶ Matters, if any, to communicate regarding management's process for identifying and responding to the risks of fraud in the entity and our assessment of the risks of material misstatement due to fraud</li> <li>▶ Any other matters related to fraud, relevant to Audit Committee responsibility</li> </ul> | This Completion report for Those Charged with Governance |

# Appendix C – Required communications with the Audit Committee (cont'd)

## Our Reporting to you

| Required communications | What is reported?   | When and where   |
|-------------------------|---|--|
| Related parties         | <p>Significant matters arising during the audit in connection with the entity's related parties including, when applicable:</p> <ul style="list-style-type: none"> <li>▶ Non-disclosure by management</li> <li>▶ Inappropriate authorisation and approval of transactions</li> <li>▶ Disagreement over disclosures</li> <li>▶ Non-compliance with laws and regulations</li> <li>▶ Difficulty in identifying the party that ultimately controls the entity</li> </ul>  | This Completion report for Those Charged with Governance |
| Independence            | <p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, integrity, objectivity and independence</p> <ul style="list-style-type: none"> <li>▶ Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</li> <li>▶ The principal threats</li> <li>▶ Safeguards adopted and their effectiveness</li> <li>▶ An overall assessment of threats and safeguards</li> <li>▶ Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul> | This Completion report for Those Charged with Governance |

# Appendix C – Required communications with the Audit Committee (cont'd)

## Our Reporting to you

| Required communications                    | What is reported?   | When and where   |
|--|---|--|
| External confirmations                     | <ul style="list-style-type: none"> <li>▶ Management's refusal for us to request confirmations</li> <li>▶ Inability to obtain relevant and reliable audit evidence from other procedures</li> </ul>  | This Completion report for Those Charged with Governance |
| Consideration of laws and regulations      | <ul style="list-style-type: none"> <li>▶ Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</li> <li>▶ Enquiry of the audit committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the audit committee may be aware of</li> </ul> | This Completion report for Those Charged with Governance |
| Internal controls                          | <ul style="list-style-type: none"> <li>▶ Significant deficiencies in internal controls identified during the audit</li> </ul>   | This Completion report for Those Charged with Governance |
| Representations                            | Written representations we are requesting from management and/or those charged with governance  | This Completion report for Those Charged with Governance |
| System of quality management               | How the system of quality management (SQM) supports the consistent performance of a quality audit   | This Completion report for Those Charged with Governance |
| Material inconsistencies and misstatements | Material inconsistencies or misstatements of fact identified in other information which management has refused to revise  | This Completion report for Those Charged with Governance |
| Auditors report                            | <ul style="list-style-type: none"> <li>▶ Key audit matters that we will include in our auditor's report</li> <li>▶ Any circumstances identified that affect the form and content of our auditor's report</li> </ul>   | This Completion report for Those Charged with Governance |



# Appendix D – PSAA Statement of Responsibilities

As set out on the next page our fee is based on the assumption that the Council complies with PSAA's Statement of Responsibilities of auditors and audited bodies. In particular the Council should have regard to paragraphs 26-28 of the Statement of Responsibilities which clearly set out what is expected of audited bodies in preparing their financial statements. We set out these paragraphs in full below:

## *Preparation of the statement of accounts*

*26. Audited bodies are expected to follow Good Industry Practice and applicable recommendations and guidance from CIPFA and, as applicable, other relevant organisations as to proper accounting procedures and controls, including in the preparation and review of working papers and financial statements.*

*27. In preparing their statement of accounts, audited bodies are expected to:*

- prepare realistic plans that include clear targets and achievable timetables for the production of the financial statements;*
- ensure that finance staff have access to appropriate resources to enable compliance with the requirements of the applicable financial framework, including having access to the current copy of the CIPFA/LASAAC Code, applicable disclosure checklists, and any other relevant CIPFA Codes.*
- assign responsibilities clearly to staff with the appropriate expertise and experience;*
- provide necessary resources to enable delivery of the plan;*
- maintain adequate documentation in support of the financial statements and, at the start of the audit, providing a complete set of working papers that provide an adequate explanation of the entries in those financial statements including the appropriateness of the accounting policies used and the judgements and estimates made by management;*
- ensure that senior management monitors, supervises and reviews work to meet agreed standards and deadlines;*
- ensure that a senior individual at top management level personally reviews and approves the financial statements before presentation to the auditor; and*
- during the course of the audit provide responses to auditor queries on a timely basis.*

*28. If draft financial statements and supporting working papers of appropriate quality are not available at the agreed start date of the audit, the auditor may be unable to meet the planned audit timetable and the start date of the audit will be delayed.*



# Appendix E – Other Communications

## EY Transparency Report 2024

EY has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained. Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the period ended 28 June 2024 and can be found here: [EY UK 2024 Transparency Report | EY - UK](#)

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