

# Audit Strategy Memorandum

Stockport Metropolitan Borough  
Council (and Group)  
Year ending 31 March 2020





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This document is to be regarded as confidential to Stockport Metropolitan Borough Council. It has been prepared for the sole use of the Audit Committee as the appropriate committee charged with governance . No responsibility is accepted to any other person in respect of the whole or part of its contents. Our written consent must first be obtained before this document, or any part of it, is disclosed to a third party.

Members of the Audit Committee  
Stockport Metropolitan Borough Council  
Fred Perry House  
Edward Street  
Stockport  
SK1 3UR

4 March 2020

Dear Audit Committee members

### **Audit Strategy Memorandum – Year ending 31 March 2020**

We are pleased to present our Audit Strategy Memorandum for Stockport Metropolitan Borough Council for the year ending 31 March 2020.

The purpose of this document is to summarise our audit approach, highlight significant audit risks and areas of key judgements and provide you with the details of our audit team. As it is a fundamental requirement that an auditor is, and is seen to be, independent of its clients, Section 8 of this document also summarises our considerations and conclusions on our independence as auditors.

We consider two-way communication with you to be key to a successful audit and important in:

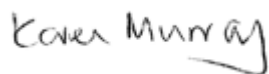
- reaching a mutual understanding of the scope of the audit and the responsibilities of each of us;
- sharing information to assist each of us to fulfil our respective responsibilities;
- providing you with constructive observations arising from the audit process; and
- ensuring that we, as external auditors, gain an understanding of your attitude and views in respect of the internal and external operational, financial, compliance and other risks facing Stockport MBC which may affect the audit, including the likelihood of those risks materialising and how they are monitored and managed.

This document, which has been prepared following our initial planning discussions with management, is the basis for discussion of our audit approach, and any questions or input you may have on our approach or role as auditor.

This document also contains specific appendices that outline our key communications with you during the course of the audit, and forthcoming accounting issues and other issues that may be of interest.

Client service is extremely important to us and we strive to continuously provide technical excellence with the highest level of service quality, together with continuous improvement to exceed your expectations so, if you have any concerns or comments about this document or audit approach, please contact me on 0161 238 9248.

Yours faithfully



Karen Murray  
Partner and Engagement Lead  
Mazars LLP

# 1. ENGAGEMENT AND RESPONSIBILITIES SUMMARY

## Overview of engagement

We are appointed to perform the external audit of Stockport Metropolitan Borough Council (the Council) for the year to 31 March 2020. The scope of our engagement is set out in the Statement of Responsibilities of Auditors and Audited Bodies, issued by Public Sector Audit Appointments Ltd (PSAA) available from the PSAA website: <https://www.psa.co.uk/audit-quality/statement-of-responsibilities/>

## Our responsibilities

Our responsibilities are principally derived from the Local Audit and Accountability Act 2014 (the 2014 Act) and the Code of Audit Practice issued by the National Audit Office (NAO), as outlined below:

### Audit opinion

We are responsible for forming and expressing an opinion on the financial statements.

Our audit is planned and performed so to provide reasonable assurance that the financial statements are free from material error and give a true and fair view of the financial performance and position of the Council for the year.

### Value for money

We are required to conclude whether the Council has proper arrangements in place to secure economy, efficiency and effectiveness in its use of resources. We discuss our approach to the value for money conclusion in section 6 of this report.

### Reporting to the NAO

We report to the NAO on the consistency of the Council's financial statements with its Whole of Government Accounts (WGA) submission.

### Electors' rights

The 2014 Act requires us to give an elector, or any representative of the elector, the opportunity to question us about the accounting records of the Council and consider any objection made to the accounts. We also have a broad range of reporting responsibilities and powers that are unique to the audit of local authorities in the United Kingdom.

Our audit does not relieve management or those charged with governance of their responsibilities. The responsibility for safeguarding assets and for the prevention and detection of fraud, error and non-compliance with law or regulations rests with both those charged with governance and management. In accordance with International Standards on Auditing (UK), we plan and perform our audit so as to obtain reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether caused by fraud or error. However our audit should not be relied upon to identify all such misstatements.

As part of our audit procedures in relation to fraud we are required to enquire of those charged with governance as to their knowledge of instances of fraud, the risk of fraud and their views on management controls that mitigate the fraud risks.

The Council is required to prepare its financial statements on a going concern basis by the Code of Practice on Local Authority Accounting. As auditors, we are required to consider the appropriateness of the use of the going concern assumption in the preparation of the financial statements and the adequacy of disclosures made.

For the purpose of our audit, we have identified the Audit Committee as those charged with governance.



## 2. YOUR AUDIT ENGAGEMENT TEAM

**Karen Murray**  
**Partner and Engagement Lead**

Email: [Karen.murray@mazars.co.uk](mailto:Karen.murray@mazars.co.uk)

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**Daniel Watson**  
**Senior Manager**

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**Assistant Manager**

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Tel: 0161 238 9230

# 3. AUDIT SCOPE, APPROACH AND TIMELINE

## Audit scope

Our audit approach is designed to provide an audit that complies with all professional requirements.

Our audit of the financial statements will be conducted in accordance with International Standards on Auditing (UK), relevant ethical and professional standards, our own audit approach and in accordance with the terms of our engagement. Our work is focused on those aspects of your business which we consider to have a higher risk of material misstatement, such as those affected by management judgement and estimation, application of new accounting standards, changes of accounting policy, changes to operations or areas which have been found to contain material errors in the past.

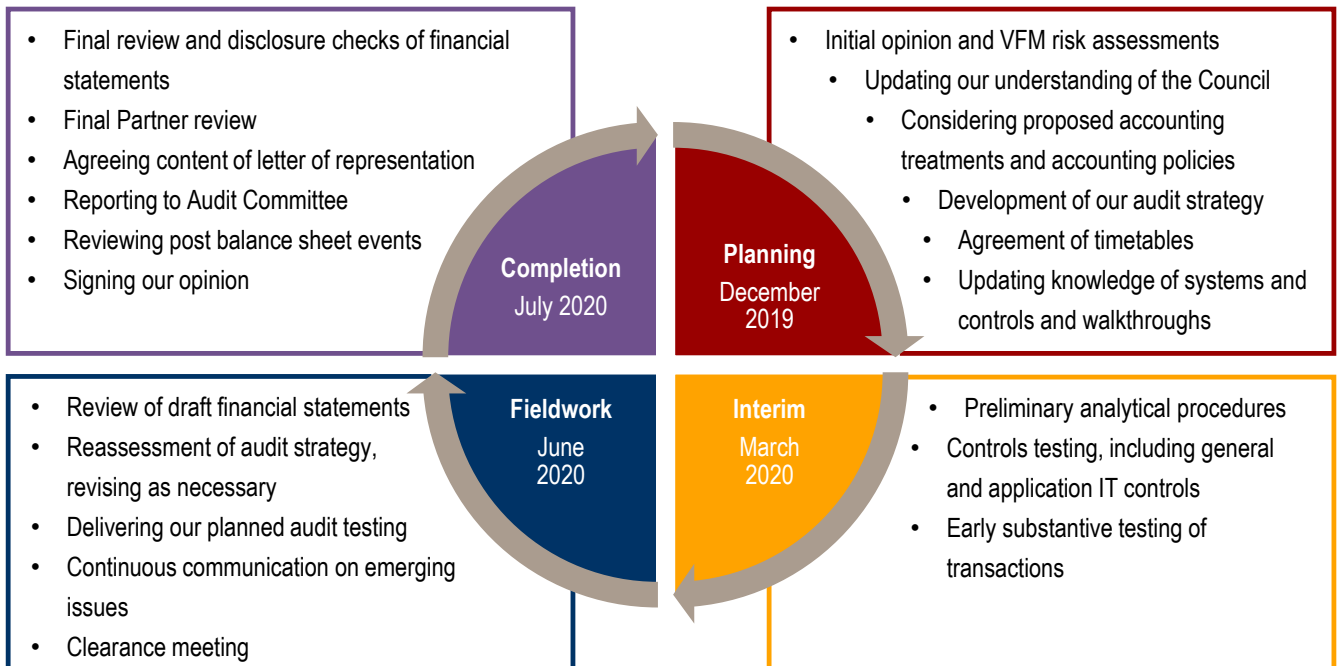
## Audit approach

Our audit approach is a risk-based approach primarily driven by the risks we consider to result in a higher risk of material misstatement of the financial statements. Once we have completed our risk assessment, we develop our audit strategy and design audit procedures in response to this assessment.

If we conclude that appropriately-designed controls are in place then we may plan to test and rely upon these controls. If we decide controls are not appropriately designed, or we decide it would be more efficient to do so, we may take a wholly substantive approach to our audit testing. Substantive procedures are audit procedures designed to detect material misstatements at the assertion level and comprise tests of details (of classes of transactions, account balances, and disclosures) and substantive analytical procedures. Irrespective of the assessed risks of material misstatement, which take into account our evaluation of the operating effectiveness of controls, we are required to design and perform substantive procedures for each material class of transactions, account balance, and disclosure.

Our audit will be planned and performed so as to provide reasonable assurance that the financial statements are free from material misstatement and give a true and fair view. The concept of materiality and how we define a misstatement is explained in more detail in section 4.

The diagram below outlines the procedures we perform at the different stages of the audit.



### 3. AUDIT SCOPE, APPROACH AND TIMELINE (CONTINUED)

#### Internal audit

We take note of the work performed by internal audit to modify the nature, extent and timing of our audit procedures. We will meet with internal audit to discuss the progress and findings of their work prior to the commencement of our controls evaluation procedures.

#### Management's and our experts

Management makes use of experts in specific areas when preparing the Council's financial statements. We also use experts to assist us to obtain sufficient appropriate audit evidence on specific items of account.

Items of account	Management's expert	Our expert
Defined benefit pension liability valuation and disclosures.	Hymans Robertson – Actuary for the Greater Manchester Pension Fund.	PwC – Consulting actuary appointed by the National Audit Office.
Property valuations: land & buildings owned by the Council and investment properties.	External – CBRE Internal Council valuer	The local audit team will challenge the key valuation assumptions.
Financial instrument disclosures	Link Asset Services	We will review Link's methodology to gain assurance that the fair value disclosures of the Council's financial assets and liabilities are materially correct.
Long Term Investments – Manchester Airport	BDO	Mazars' Financial Reporting Valuations Team.

#### Service organisations

International Auditing Standards (UK) define service organisations as third party organisations that provide services to the Council that are part of its information systems relevant to financial reporting. We are required to obtain an understanding of the services provided by service organisations as well as evaluating the design and implementation of controls over those services. The table below summarises the service organisations used by the Council and our planned audit approach. There are no service organisations identified at planning stage used by the Council which impact upon our planned audit approach.



### 3. AUDIT SCOPE, APPROACH AND TIMELINE (CONTINUED)

#### Group audit approach

The Council prepares Group accounts and consolidates the following bodies:

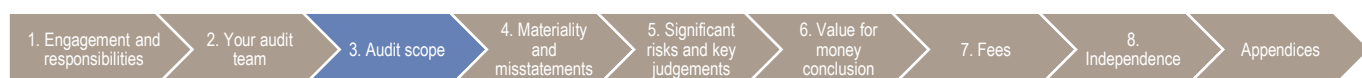
- Totally Local Company Limited – a 100% owned subsidiary of the Council
- Stockport Homes Limited – a 100% owned subsidiary of the Council.

These subsidiaries are accounted for on an acquisition basis and consolidated on a line by line basis, writing out intergroup transactions. The Council only includes Group accounts disclosure notes where they are materially different to the single entity notes. Further detail on our approach to the Group audit is set out below:

Entity	Level of response	Risks identified	Planned audit approach
Totally Local Company Limited (TLC)	Analytical	Alignment of group accounting policies	<p>Early engagement with the Council's finance team.</p> <p>Review of TLC Ltd audited accounts.</p> <p>Review of Council's finance team consolidation workings.</p>
Stockport Homes Ltd	Analytical	Alignment of group accounting policies	<p>Early engagement with the Council's finance team.</p> <p>Review of Stockport Homes Ltd audited accounts.</p> <p>Review of Council's finance team consolidation workings.</p>

We apply a separate materiality for the audit of the Group accounts as set out in Section 4.

The Council also holds investments and interests in other bodies. Management carry out an annual assessment to see if these bodies have become sufficiently material to warrant consolidation into the Group accounts. Stockport Exchange Phase 2 Ltd and Stockport Hotel management Company are the next largest bodies but were not consolidated in 2018/19 because their inclusion would not materially alter the accounts. We will revisit management's assessment of the Group boundary for 2019/20





## 4. MATERIALITY AND MISSTATEMENTS

### Summary of initial materiality thresholds

Threshold	Group materiality	Council materiality
Overall materiality	£16,093,000	£15,485,000
Performance materiality	£12,874,000	£12,388,000
Specific lower materiality – Officer Remuneration bandings	N/A	£5,000 *
Trivial threshold for errors to be reported to the Audit Committee	£483,000	£465,000

\* Reflecting movement from one salary band to another

### Materiality

Materiality is an expression of the relative significance or importance of a particular matter in the context of financial statements as a whole. Misstatements in financial statements are considered to be material if they, individually or in aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Judgements on materiality are made in light of surrounding circumstances and are affected by the size and nature of a misstatement, or a combination of both. Judgements about materiality are based on consideration of the common financial information needs of users as a group and not on specific individual users.

The assessment of what is material is a matter of professional judgement and is affected by our perception of the financial information needs of the users of the financial statements. In making our assessment we assume that users:

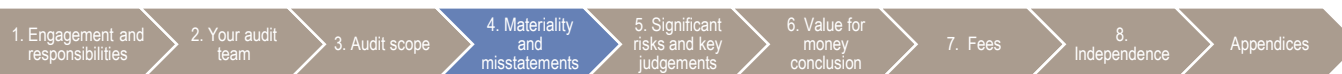
- have a reasonable knowledge of business, economic activities and accounts;
- have a willingness to study the information in the financial statements with reasonable diligence;
- understand that financial statements are prepared, presented and audited to levels of materiality;
- recognise the uncertainties inherent in the measurement of amounts based on the use of estimates, judgement and the consideration of future events; and
- will make reasonable economic decisions on the basis of the information in the financial statements.

We consider materiality whilst planning and performing our audit based on quantitative and qualitative factors.

Whilst planning, we make judgements about the size of misstatements which we consider to be material and which provides a basis for determining the nature, timing and extent of risk assessment procedures, identifying and assessing the risk of material misstatement and determining the nature, timing and extent of further audit procedures.

The materiality determined at the planning stage does not necessarily establish an amount below which uncorrected misstatements, either individually or in aggregate, will be considered as immaterial.

We revise materiality for the financial statements as our audit progresses should we become aware of information that would have caused us to determine a different amount had we been aware of that information at the planning stage.



## 4. MATERIALITY AND MISSTATEMENTS (CONTINUED)

Our provisional materiality is set based on a benchmark of the 2018/19 gross expenditure at the provision of services level. We have calculated a headline figure for materiality but have also identified separate levels for procedures designed to detect individual errors, and also a level above which all identified errors will be reported to the Audit Committee.

We consider that gross expenditure at the provision of services level is the key focus of users of the financial statements and, as such, we base our materiality levels around this benchmark.

We have set our materiality threshold at 2% of the benchmark based on the 2018/19 audited financial statements. After setting initial materiality, we continue to monitor materiality throughout the audit to ensure that it is set at an appropriate level.

### Performance Materiality

Performance materiality is the amount or amounts set by the auditor at less than materiality for the financial statements as a whole to reduce, to an appropriately low level, the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statements as a whole.

### Specific materiality levels

We have also calculated materiality for specific classes of transactions, balances or disclosures where we determine that misstatements of a lesser amount than materiality for the financial statements as a whole, could reasonably be expected to influence the decisions of users taken on the basis of the financial statements. We have set specific materiality for the following item of account:

- Officer Remuneration bandings.

### Reporting Misstatements Threshold

We aggregate misstatements identified during the audit that are other than clearly trivial. We set a level of triviality for individual errors identified (a reporting threshold) for reporting to the Audit Committee that is consistent with the level of triviality that we consider would not need to be accumulated because we expect that the accumulation of such amounts would not have a material effect on the financial statements. Based on our preliminary assessment of overall materiality, our proposed triviality threshold is £483,000 for the Group and £465,000 for the Council single-entity financial statements based on 3% of overall materiality.

### Reporting to the Audit Committee

To comply with International Standards on Auditing (UK), the following three types of audit differences will be presented to the Audit Committee:

- summary of adjusted audit differences;
- summary of unadjusted audit differences; and
- summary of disclosure differences (adjusted and unadjusted).



# 5. SIGNIFICANT RISKS AND KEY JUDGEMENT AREAS

Following the risk assessment approach discussed in section 3 of this document, we have identified relevant risks to the audit of financial statements. The risks that we identify are categorised as significant, enhanced or standard, as defined below:

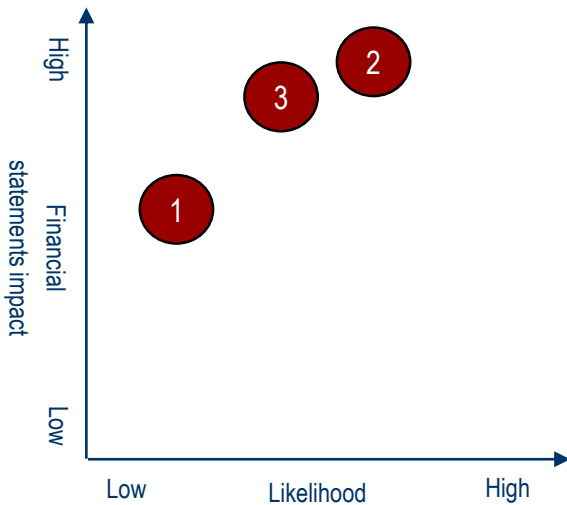
**Significant risk** A significant risk is an identified and assessed risk of material misstatement that, in the auditor’s judgment, requires special audit consideration. For any significant risk, the auditor shall obtain an understanding of the entity’s controls, including control activities relevant to that risk.

**Enhanced risk** An enhanced risk is an area of higher assessed risk of material misstatement at audit assertion level other than a significant risk. Enhanced risks incorporate but may not be limited to:

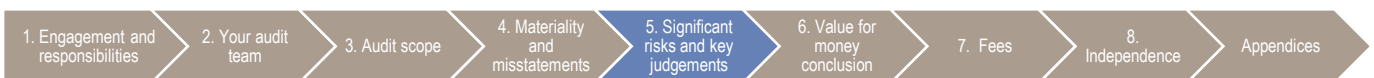
- key areas of management judgement, including accounting estimates which are material but are not considered to give rise to a significant risk of material misstatement; and
- other audit assertion risks arising from significant events or transactions that occurred during the period.

**Standard risk** This is related to relatively routine, non-complex transactions that tend to be subject to systematic processing and require little management judgement. Although it is considered that there is a risk of material misstatement, there are no elevated or special factors related to the nature, the likely magnitude of the potential misstatements or the likelihood of the risk occurring.

The summary risk assessment, illustrated in the table below, highlights those risks which we deem to be significant. We have summarised our audit response to these risks on the next page.



Significant Risk	
1	Management override of control
2	Property, plant and equipment valuation
3	Defined Benefit liability valuation

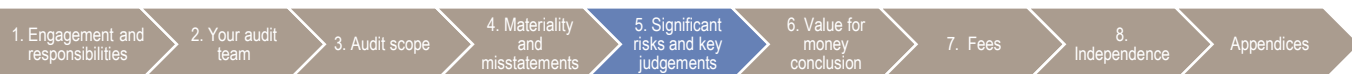


## 5. SIGNIFICANT RISKS AND KEY JUDGEMENT AREAS (CONTINUED)

We provide more detail on the identified risks and our testing approach with respect to significant risks in the table below. An audit is a dynamic process; should we change our view of risk or approach to address the identified risks during the course of our audit, we will report this to the Audit Committee.

### Significant risks

	Description of risk	Planned response
1	<p><b>Management override of controls (Council)</b></p> <p>Management at various levels within an organisation are in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. Due to the unpredictable way in which such override could occur there is a risk of material misstatement due to fraud on all audits.</p>	<p>We plan to address the risk through performing audit procedures that cover a range of areas, including:</p> <ul style="list-style-type: none"> <li>• material accounting estimates;</li> <li>• journal entries, focussing on those that we determine to contain certain risk characteristics; and</li> <li>• any significant transactions outside the normal course of business or otherwise unusual.</li> </ul>
2	<p><b>Property, plant and equipment valuation – Land, buildings and investment properties (Council)</b></p> <p>The Council's accounts contain material balances and disclosures relating to its holding of property, plant and equipment (PPE) including investment properties, with the majority of property assets required to be carried at valuation. Due to the high degree of estimation uncertainty associated with these valuations especially within land and buildings, we have determined there is a significant risk in this area.</p>	<p>We will carry out a range of procedures designed to address the risk. These will include:</p> <ul style="list-style-type: none"> <li>• assessing the skill, competence and experience of the Council's external valuers;</li> <li>• reviewing the instructions issued to the external valuer by management to ensure they comply with the Code requirements;</li> <li>• consider whether the overall revaluation methodology used by the Council valuer is in line with industry practice, social housing statutory guidance, the CIPFA Code of Practice and the Council's accounting policies;</li> <li>• understanding the process followed by management to seek assurance that any land and buildings assets not revalued at 31 March 2020 are not materially misstated;</li> <li>• assess the movement in market indices between the revaluation dates and the year end to determine whether there have been material movements over that time;</li> <li>• critically assess the appropriateness of the social housing factor applied to the valuation of the Council Dwellings;</li> <li>• testing the valuation on a sample of properties.</li> <li>• test a sample of items of capital expenditure in 2019/20 to confirm that the additions are appropriately valued in the financial statements.</li> </ul>



## 5. SIGNIFICANT RISKS AND KEY JUDGEMENT AREAS (CONTINUED)

### Significant risks (continued)

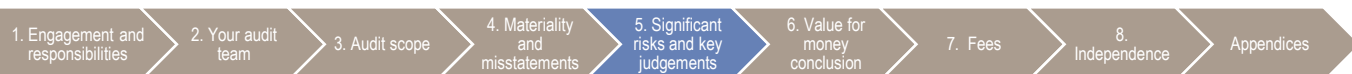
	Description of risk	Planned response
3	<p><b>Defined benefit liability valuation (Council)</b></p> <p>The Council's accounts contain material liabilities relating to the local government pension scheme administered by the Greater Manchester Pension Fund (GMPF). The Council relies upon an actuary, Hymans Robertson to provide an annual valuation of these liabilities in line with the requirements of IAS 19 Employee Benefits. Due to the high degree of estimation uncertainty associated with this valuation, we have determined there is a significant risk in this area.</p>	<p>We will carry out a range of procedures designed to address the risk. These will include:</p> <ul style="list-style-type: none"> <li>• corresponding with the GMPF auditor to gain assurance on their audit of the fund;</li> <li>• assessing the skill, competence and experience of the Fund's actuary, Hymans Robertson including a review of the actuary by our actuarial expert PWC;</li> <li>• challenging the reasonableness of the assumptions used by the actuary as part of the annual IAS 19 valuation;</li> <li>• reviewing the appropriateness of the Pension Asset and Liability valuation methodologies applied by GMPF Actuary, and the key assumptions included within the valuation. This will include comparing them to expected ranges, utilising information provided by PWC, consulting actuary engaged by the National Audit Office;</li> <li>• carrying out a range of substantive procedures on relevant information and cash flows used by the actuary as part of the annual IAS 19 valuation.</li> </ul>

### Fraudulent revenue recognition

International Standard on Auditing (ISA) 240 includes a rebuttable presumption that the fraud risk from revenue recognition is a significant audit risk.

We do not consider this to be a significant risk for Stockport Metropolitan Borough Council as the majority of Council income comes from local taxes, grants and fees and charges. These are predictable and less prone to fraudulent manipulation by a material amount. Also management is not incentivised to boost income and we consider ethical standards at the council to be high. We therefore rebut this risk and do not incorporate specific risk procedures over and above our standard fraud procedures to address the risk of fraudulent revenue recognition.

If during our audit we identify any material revenue streams which we consider may present a material risk of fraudulent revenue recognition, we will revisit the rebuttal and update management and the Audit Committee of any additional audit procedures required.



## 5. SIGNIFICANT RISKS AND KEY JUDGEMENT AREAS (CONTINUED)

### Key areas of management judgement and enhanced risks

Key areas of management judgement include accounting estimates which are material but are not considered to give rise to a significant risk of material misstatement. These areas of management judgement represent other areas of audit emphasis, and include the management judgement areas the Council discloses in its financial statements

	Area of management judgement	Planned response
1	<p><b>Valuation of shareholding in Manchester Airport (Council)</b></p> <p>The valuation of the Council's shareholding in the Airport involves judgement as it is not publicly traded.</p>	<p>We will review the work of BDO as management's expert used to value the shares held in the Airport and ensure the valuation is properly recorded in the accounts.</p>
2.	<p><b>Group consolidation (Group)</b></p> <p>Management assess which related organisations fall inside and outside the group boundary for consolidation purposes.</p> <p>For the two organisations management identify for consolidation (Totally Local Company Ltd and Stockport Homes Ltd), their accounts require adjustments from their UK GAAP compilation to an IFRS basis in order to be consistent with the Council for consolidation.</p>	<p>We will review management's assessment of the Group boundary, and their process followed for consolidation, including adjustments from UK GAAP to IFRS.</p>
3.	<p><b>Schools (Council)</b></p> <p>Management judge whether schools fall inside or outside their control when determining which are included in the Council's financial statements.</p>	<p>We will review management's assessment of who controls the schools within the borough for the purposes of inclusion within the Council's financial statements.</p>

# 6. VALUE FOR MONEY CONCLUSION

## Our audit approach

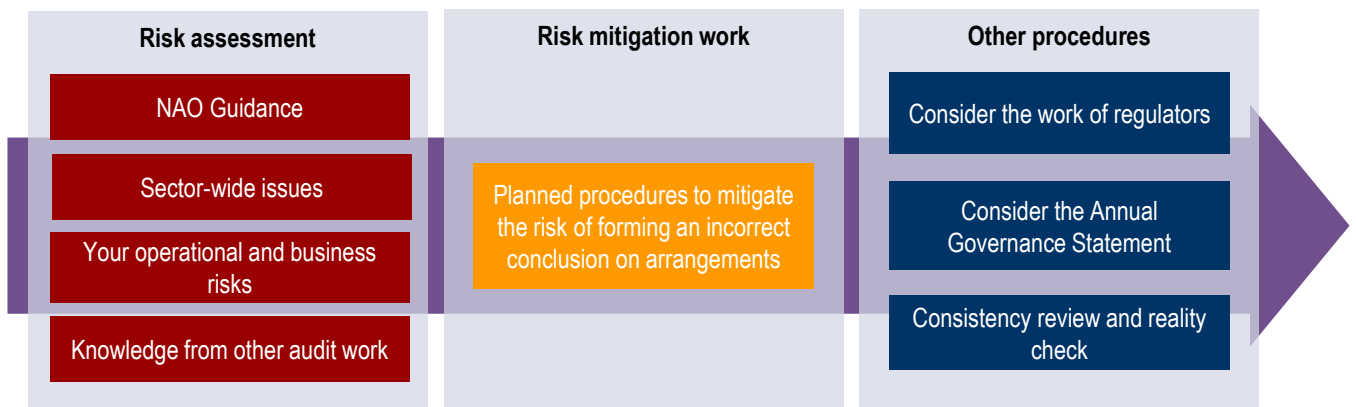
We are required to form a conclusion as to whether the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The NAO issues guidance to auditors that underpins the work we are required to carry out, and sets out the overall criterion and sub-criteria that we are required to consider.

The overall criterion is that, 'in all significant respects, the Council had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.'

To assist auditors in reaching a conclusion on this overall criterion, the following sub-criteria are set out by the NAO:

- informed decision making;
- sustainable resource deployment; and
- working with partners and other third parties.

A summary of the work we undertake to reach our conclusion is provided below:



## Significant audit risk

The NAO's guidance requires us to carry out work at the planning stage to identify whether or not a value for money (VFM) audit risk exists. Risk, in the context of our work, is the risk that we come to an incorrect conclusion rather than the risk of the arrangements in place at the Council being inadequate. As outlined above, we draw on our deep understanding of the Council and its partners, the local and national economy and wider knowledge of the public sector.

For the 2019/20 financial year, we have identified the following significant risk to our VFM work detailed overleaf:



## 6. VALUE FOR MONEY CONCLUSION

### Significant Value for Money risk (continued)

Description of significant risk	Planned response
<p><b>Financial sustainability</b></p> <p>The Council's medium term financial strategy for the period 2020/21 to 2022/23 sets out the financial challenges it faces. Across the three year period there is a cumulative savings requirement of £17.0m. The Q3 reporting for 2019/20 indicates that the Council is projecting a surplus of £0.966m (forecast expenditure of £239.554m at 31 March 2020). Cash limited budgets are tightly controlled with the largest variance being an overspend within Adult Care and Health of £0.497m reflecting pressures felt nationally. This pressure is offset by the non-cash limited budget gain with the Manchester Airport Group Interim Dividend, declared in December 2019, being £0.929m above budget. This was not unexpected but the Council is prudent not to recognise the dividend until confirmed.</p> <p>Despite the favourable position at Q3, the continuing challenges the Council faces are not new and are not unique to Stockport Metropolitan Borough Council. The challenges therefore present a significant audit risk in respect of considering the arrangements that the Council has in place to deliver financial sustainability over the medium term.</p>	<p>We will review the arrangements the Council has in place for ensuring financial resilience, specifically that the medium term financial plan has taken into consideration factors such as future funding sources and levels, levels of other income, salary and general inflation, demand pressures, restructuring costs and sensitivity analysis given the degree of variability in the above factors. We will also review the arrangements in place to monitor progress delivering the 2019/20 budget and related savings plans.</p>





## 7. FEES FOR AUDIT AND OTHER SERVICES

### Fees for work as the Council's appointed auditor

The scale fee set by PSAA is:

Service	2018/19 fee	2019/20 fee
Audit of the financial statements and VFM conclusion work	£97,719*	£97,119

\* Includes additional fee of £600 to respond to additional audit work on pension liability in 2018/19.

However, in common with all local government external auditors we are required to carry out additional procedures which were not expected when fees were set as a result of regulatory recommendations.

We continually strive to maintain high standards of audit quality. One mechanism for doing this is to consider the outcome of independent quality reviews, in particular by the Financial Reporting Council, of our audit work and that of other audit suppliers. In particular we are planning increases in the level of work we do on:

- defined benefit pension schemes; and
- valuation of property, plant and equipment

We will discuss the driving factors with Council officers as our audit progresses and, if appropriate, the audit fee for 2019/20 will be revisited to reflect the increased level of work that was not considered when the scale fee was set. Any agreed additional fee is also subject to detailed scrutiny by the PSAA as part of the approval process.

### Fees for non-PSAA work

There are no additional fees arising for non-PSAA work in the 2019/20 financial year.

## 8. OUR COMMITMENT TO INDEPENDENCE

We are committed to independence and are required by the Financial Reporting Council to confirm to you at least annually, in writing, that we comply with the Financial Reporting Council's Ethical Standard. In addition, we communicate any matters or relationship which we believe may have a bearing on our independence or the objectivity of the audit team.

Based on the information provided by you and our own internal procedures to safeguard our independence as auditors, we confirm that in our professional judgement there are no relationships between us and any of our related or subsidiary entities, and you and your related entities creating any unacceptable threats to our independence within the regulatory or professional requirements governing us as your auditors.

We have policies and procedures in place which are designed to ensure that we carry out our work with integrity, objectivity and independence. These policies include:

- all partners and staff are required to complete an annual independence declaration;
- all new partners and staff are required to complete an independence confirmation and also complete computer-based ethics training;
- rotation policies covering audit engagement partners and other key members of the audit team;
- use by managers and partners of our client and engagement acceptance system which requires all non-audit services to be approved in advance by the audit engagement partner.

We confirm, as at the date of this document, that the engagement team and others in the firm as appropriate, and Mazars LLP are independent and comply with relevant ethical requirements. However, if at any time you have concerns or questions about our integrity, objectivity or independence please discuss these with Karen Murray in the first instance.

Prior to the provision of any non-audit services Karen Murray will undertake appropriate procedures to consider and fully assess the impact that providing the service may have on our auditor independence. Included in this assessment is consideration of Auditor Guidance Note 01 as issued by the NAO, and the PSAA Terms of Appointment.

During 2018/19 we provided services provided to organisations within the Council's group – Totally Local Company Ltd and Waste Solutions SK Ltd, including statutory audit services, accounts production and tax compliance procedures. The total value of this work was £32,500. However, we became aware of circumstances which create a probable breach of the Ethical Standard and therefore impair our independence as auditors of the Company for the 31 March 2020 year end. With no adequate safeguards available we have resigned as auditors of the company. We do not consider that this impacts our audit of the Council, however we have appointed an External Quality Control Reviewer to the audit as an additional safeguard.



# APPENDIX A – KEY COMMUNICATION POINTS

ISA (UK) 260 'Communication with Those Charged with Governance', ISA (UK) 265 'Communicating Deficiencies In Internal Control To Those Charged With Governance And Management' and other ISAs (UK) specifically require us to communicate the following:

Required communication	Audit Strategy Memorandum	Audit Completion Report
Our responsibilities in relation to the audit of the financial statements and our wider responsibilities	✓	
Planned scope and timing of the audit	✓	
Significant audit risks and areas of management judgement	✓	
Our commitment to independence	✓	✓
Responsibilities for preventing and detecting errors	✓	
Materiality and misstatements	✓	✓
Fees for audit and other services	✓	
Significant deficiencies in internal control		✓
Significant findings from the audit		✓
Significant matters discussed with management		✓
Our conclusions on the significant audit risks and areas of management judgement		✓
Summary of misstatements		✓
Management representation letter		✓
Our proposed draft audit report		✓

# APPENDIX B – FORTHCOMING ACCOUNTING AND OTHER ISSUES

## Financial reporting changes relevant to 2019/20

There are no significant changes in the Code of Practice on Local Authority Accounting for the 2019/20 financial year.

## Financial reporting changes in future years

Accounting standard	Year of application	Commentary
IFRS 16 – Leases	2020/21	<p>The CIPFA/LASAAC Code Board has determined that the Code of Practice on Local Authority Accounting will adopt the principles of IFRS 16 Leases, for the first time from 2020/21.</p> <p>IFRS 16 will replace the existing leasing standard, IAS 17, and will introduce significant changes to the way bodies account for leases, which will have substantial implications for the majority of public sector bodies.</p> <p>The most significant changes will be in respect of lessee accounting (i.e. where a body leases property or equipment from another entity). The existing distinction between operating and finance leases will be removed and instead, the new standard will require a right of use asset and an associated lease liability to be recognised on the lessee's Balance Sheet.</p> <p>In order to meet the requirements of IFRS 16, all local authorities will need to undertake a significant project that is likely to be time-consuming and potentially complex. There will also be consequential impacts upon capital financing arrangements at many authorities which will need to be identified and addressed at an early stage of the project.</p> <p>Although this change is effective from 1 April 2020, it is important to note that the Council must disclose the likely future impact in the 2019/20 accounts.</p>