

### **Orkney & Shetland Valuation Joint Board**

Planning report to the Board on the 2016/17 audit

17 February 2017

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### **Director introduction**

### The key messages in this report

I have pleasure in presenting our planning report to the Board for the 2017 audit. I would like to draw your attention to the key messages of this paper:

Audit quality is our number one priority. We plan our audit to focus on audit quality and have set the following audit quality objectives for this audit:

A robust challenge of the key judgements taken in the preparation of the financial statements.

A strong understanding of your internal control environment.

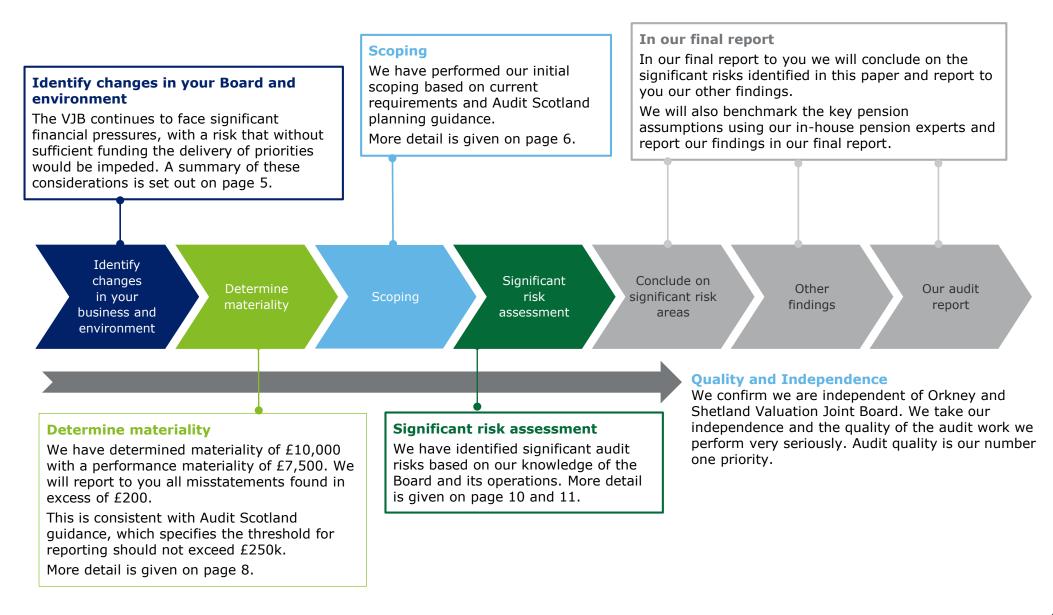
A well planned and delivered audit that raises findings early with those charged with governance.

Financial challenges	<ul> <li>As with all public sector bodies, Orkney and Shetland Valuation Joint Board ('VJB') continues face significant financial challenges and without sufficient funding the delivery of priorities wou be impeded. The Board approved a one-year standstill budget strategy for 2016/17. In agreein to this, the Board proposed a review to be carried out to ensure that there is sufficient resource to deliver the duties of the Board and Best Value is being achieved by the Board on behalf of the constituent authorities in delivering valuation and Individual Electoral Registration (IER) service The achievement of a breakeven position will be a key focus of our audit.</li> </ul>		
Significant risks       • We have identified the following financial statement significant risks:         • income recognition; and         • management override of controls.			
Audit Dimensions	<ul> <li>The 2016 Code of Audit Practice sets our four audit dimensions which set a common framewo for all public sector audits in Scotland. These are financial sustainability, financial managemer governance and transparency and value for money. Due to the relative size and scale of th functions delivered by the VJB, we have concluded that the full wider scope of audit is n appropriate. In accordance with paragraph 53 of the Code, our work in this area will therefore l restricted to concluding on:</li> </ul>		
	<ul> <li>the appropriateness of the disclosures in the governance statement; and</li> <li>the financial sustainability of the board and the services that it delivers over the mediu to longer term.</li> </ul>		
Other wider scope work	<ul> <li>In accordance with Audit Scotland guidance, we will be requested to provide information support national performance audits and to inform wider analysis on the follow-up of Role Boards report.</li> </ul>		
Our commitment to quality	<ul> <li>We are committed to providing the highest quality audit, with input from our market leadin specialists, sophisticated data analytics and our wealth of experience. Further information presented on page 13.</li> </ul>		

Audit Director

### Our audit explained

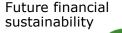
### We tailor our audit to your business and your strategy



### An audit tailored to you

### Focusing on your business and strategy

Impact on our audit





As with all public sector bodies, the VJB continues to face significant financial challenges.

The VJB must continue to look at how it can reduce costs to meet the challenge of making savings per year or secure additional longer term funding. We will consider the VJB's financial sustainability in the medium to longer term and consider whether it is planning effectively to continue to deliver its services on a sustainable basis.

#### Best Value review



In its 2015/16 annual report, Audit Scotland reported that in the past two years, the VJB had failed to achieve its key performance targets and is completing a Best Value review to establish the best way forward for the Board to meet its obligations and deliver best value. In its 2016/17 budget approved in March 2016, the emerging costs and funding for IER work that had been introduced in 2015/16 were recognised by the Board. The uncertainty and potential for reduced funding from the UK Government has resulted in the constituent authorities identifying additional costs for the delivery of these services as a call on their contingencies. The evidence to support a call from contingencies will be identified as part of the findings and recommendations of the Best Value review. We will consider the outcome of this review as part of our consideration of the Board's future financial sustainability.

#### Governance policies

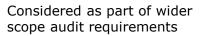


Audit Scotland also reported in its 2015/16 annual report that the VJB does not have a Business Plan and several governance policies were either out of date or are due to be updated. We will monitor progress as part of our audit work on the annual governance statement disclosures.





Normal risk



### Scoping

### Our key areas of responsibility under the Code of Audit Practice



#### **Core audit**

Our core audit work as defined by Audit Scotland comprises:

- providing the Independent Auditor's Report on the annual accounts (and any assurance statement on whole of government accounts);
- providing the annual report on the audit addressed to the Board and the Controller of Audit;
- communicating **audit plans** to those charged with governance;
- providing reports to management, as appropriate, in respect of the auditor's corporate governance responsibilities in the Code (including auditors' involvement in the NFI exercise);
- preparing and submitting fraud returns, including nil returns, to Audit Scotland where appropriate;
- identifying significant matters arising from the audit, alert the Controller of Audit and support Audit Scotland in producing statutory reports as required; and
- undertaking work requested by Audit Scotland or local performance audit work.

#### Wider scope requirements

The Code of Audit Practice sets out four audit dimensions which set a common framework for all public sector audits in Scotland:

- **Financial sustainability** looking forward to the medium and longer term to consider whether the body is planning effectively to continue to deliver its services or the way in which they should be delivered.
- **Financial management** financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively.
- **Governance and transparency** the effectiveness of scrutiny and governance arrangements, leadership and decision making, and transparent reporting of financial and performance information.
- Value for money using resources effectively and continually improving services.

Due to the relative size and simplicity of the functions delivered by Orkney and Shetland Valuation Joint Board, we have concluded that the full wider scope of audit is not appropriate. In accordance with paragraph 53 of the Code, our work in this area will therefore be restricted to concluding on:

- the appropriateness of the disclosures in the governance statement; and
- The financial sustainability of the board and the services that it delivers over the medium to longer term.

### Scoping (continued) Our approach



#### Liaison with internal audit

The Auditing Standards Board's version of ISA (UK and Ireland) 610 "Using the work of internal auditors" prohibits use of Internal Audit to provide "direct assistance" to the audit. Our approach to the use of the work of Internal Audit has been designed to be compatible with these requirements.

The VJB uses the corporate financial systems of Shetland Island Council as well as the Council's internal audit function. We will review reports prepared by Internal Audit and meet with them to discuss their work. We will also discuss the work where they have identified specific material deficiencies in the control environment and we will consider adjusting our testing so that the audit risk is covered by our work.

Using these discussions to inform our risk assessment, we will work together with Internal Audit to develop an approach that avoids inefficiencies and overlaps, therefore avoiding any unnecessary duplication of audit requirements on the Board and Council's staff.

Obtain an

understanding of the Board and its environment including the identification of relevant controls.

Identify risks and and controls implementation" that address controls. those risks.

Carry out "design If considered necessary, test the work on relevant operating effectiveness of selected controls

Design and perform a combination of substantive analvtical procedures and tests of details that are most responsive to the assessed risks.

#### Approach to controls testing

Our risk assessment procedures will include obtaining an understanding of controls considered to be 'relevant to the audit'. This involves evaluating the design of the controls and determining whether they have been implemented ("D & I").

The results of our work in obtaining an understanding of controls and any subsequent testing of the operational effectiveness of controls will be collated and the impact on the extent of substantive audit testing required will be considered.

#### Promoting high quality reporting to stakeholders

We view the audit role as going beyond reactively checking compliance with requirements. We seek to provide advice on evolving good practice to promote high quality reporting.

We will utilise the Code of Practice on Local Authority Accounting in the UK Disclosure Checklist to support the Board in preparing high quality drafts of the Annual Report and financial statements, which we would recommend the Partnership complete during drafting.

The Disclosure Checklist reflects the cutting clutter agenda and includes a "not material" column. We would encourage the Board to exclude disclosure if the information is not material.

### Materiality Approach to materiality



Basis of materiality – benchmark	<ul> <li>The audit director has determined materiality as £10,000 and a performance materiality of £7,500, based on professional judgement, the requirements of auditing standards and the financial measures most relevant to users of the financial statements.</li> </ul>
Gross	• We have used 1.6% of forecast gross expenditure as the benchmark for determining materiality.
Expenditure £671k Materiality	<ul> <li>Our approach to determining the materiality benchmark is consistent with Audit Scotland guidance which states that the threshold for clearly trivial above which we should accumulate misstatements for reporting and correction to audit committees must not exceed £250,000.</li> </ul>
£10k Reporting to those charged with	Under the current materiality level based on gross expenditure, we will report to you all misstatements found in excess of £200.
governance	
	We will report to you misstatements below this threshold if we consider them to be material by nature.

Although materiality is the judgement of the audit director, the Board must satisfy themselves that the level of materiality chosen is appropriate for the scope of the audit.

# Significant risks

### Income Recognition Completeness and accuracy of income

#### Nature of risk

ISA 240 states that when identifying and assessing the risks of material misstatement due to fraud, the auditor shall, based on a presumption that there are risks of fraud in revenue recognition, evaluate which types of revenue, revenue transactions or assertions give rise to such risks. The main components of income for the VJB are requisitions received from the Orkney and Shetland Islands Councils. The significant risk is pinpointed to the recognition of requisition income, being completeness and accuracy of income received from the Councils.

#### The key judgement areas, its potential impact on the financial statements and our planned audit challenge

We will perform the following:

- test the requisition income to ensure that the correct amounts have been input and received in accordance with that agreed as part of budget process and that any discounts or reductions have been appropriately applied;
- test the reconciliations performed by the VJB at 31 March 2017 to confirm all income is correctly recorded in the ledger;
- compare income recorded with expectations, based on amounts agreed as part of budget process;
- confirm that the reconciliations performed during 2016/17 have been reviewed on a regular basis; and
- assess management's controls around recognition of requisition income.



#### **Deloitte comment**

No testing has been performed to date as we will complete the above as part of our year-end visit.

### Management override of controls

We will use computer assisted audit techniques, including Spotlight, to support our work on the risk of management override

#### Nature of risk

International Standards on Auditing requires auditors to identify a presumed risk of management override of control. This presumed risk cannot be rebutted by the auditor. This recognises that management within SIC acting on behalf of the Board may be able to override controls that are in place to present inaccurate or even fraudulent financial reports.

#### The key judgement areas, its potential impact on the financial statements and our planned audit challenge

Our work will focus on:

- the testing of journals, using data analytics to focus our testing on higher risk journals;
- significant accounting estimates. In addition to the estimates discussed above in respect of property valuations, we will also consider any other provisions and accruals; and
- any unusual transactions or one-off transactions, including those with related parties.

Our wider response to the risk of fraud is set out in the Appendix of this report.

In considering the risk of management override, we will:

- · assess the overall position taken in respect of key judgements and estimates;
- · consider the sensitivity of the financial statements with respect to the achieving financial
- · consider remuneration plans and linkage with key management judgements; and
- consider our view on the overall control environment and 'tone at the top'.

#### **Deloitte comment**

No testing has been performed to date as we will complete the above as part of our year-end visit.

## Wider scope requirements

### Audit dimensions

The Code of Audit Practice sets our four audit dimensions which set a common framework for all public sector audits in Scotland. These are financial sustainability, financial management, governance and transparency and value for money. Due to the relative size and simplicity of the functions delivered by the VJB, we have concluded that the full wider scope of audit is not appropriate. In accordance with paragraph 53 of the Code, our work in this area will therefore be restricted to concluding on the following:

Audit dimension	Areas to be considered	Impact on the 2017 Audit
The appropriateness of the disclosures in the governance statement.	<ul> <li>The completeness of the disclosures in meeting the requirements of the new guidance note issued by CIPFA <i>Delivering good governance in local government: framework 2016.</i></li> <li>Inconsistencies between the disclosures or information that is materially incorrect and audit knowledge.</li> </ul>	We will review the draft governance statement and assess whether there are any inconsistencies or omissions based on other audit evidence obtained throughout the audit. We will also follow up on the progress with review of the Board's governance policies.
<b>Financial sustainability</b> looks forward to the medium and longer term to consider whether the body is planning effectively to continue to deliver its services or the way in which they should be delivered.	<ul> <li>The financial planning systems in place across the shorter and longer terms</li> <li>The arrangements to address any identified funding gaps</li> <li>The affordability and effectiveness of funding and investment decisions made</li> </ul>	We will monitor the VJB's actions in respect of its short, medium and longer term financial plans. As noted on page 5, we will also consider the outcome of the Best Value review.
Performance Audits		

Performance Audits

In accordance with Audit Scotland planning guidance, we will be requested to provide information to support performance audits and to inform wider analysis on the following subjects during the year:

#### Purpose

Contribute to follow up Role of Boards

Date 30 June 2017

### Audit quality Our commitment to audit quality

Our objective is to deliver a distinctive, quality audit to you. Every member of the engagement team will contribute, to achieve the highest standard of professional excellence.

In particular, for your audit, we consider that the following steps will contribute to the overall quality:

- We will apply professional scepticism on the material issues and significant judgements identified, by using our expertise in the public sector and elsewhere to provide robust challenge to management;
- We will obtain a deep understanding of the VJB, its environment and of your processes in key areas such as income recognition and expenditure enabling us to develop a risk-focused approach tailored to the VJB;
- Our engagement team is selected to ensure that we have the right subject matter expertise and industry knowledge;
- In order to deliver a quality audit to you, each member of the core audit team has received tailored training to develop their expertise in audit skills which includes local Engagement Team Based Learning. This is a director led programme encouraging teams from across our practice to engage and discuss current sector and audit issues, sharing best practice and expertise.

#### **Engagement Quality Control Review**

We have developed a tailored Engagement Quality Control approach. Our dedicated Professional Standards Review (PSR) function will provide a 'hot' review before any audit or other opinion is signed. PSR is operationally independent of the audit team, and supports our high standards of professional scepticism and audit quality by providing a rigorous independent challenge.

### Purpose of our report and responsibility statement Our report is designed to help you meet your governance duties

#### What we report

Our report is designed to establish our respective responsibilities in relation to the financial statements audit, to agree our audit plan and to take the opportunity to ask you questions at the planning stage of our audit. Our report includes:

- Our audit plan, including key audit judgements and the planned scope;
- Key regulatory and corporate governance updates, relevant to you.

#### **Other relevant communications**

- This report should be read alongside the supplementary "Briefing on audit matters" circulated separately on 30 January 2017
- We will update you if there are any significant changes to the audit plan.

#### What we don't report

- As you will be aware, our audit is not designed to identify all matters that may be relevant to the Board.
- Also, there will be further information you need to discharge your governance responsibilities, such as matters reported on by management or by other specialist advisers.
- Finally, the views on internal controls and business risk assessment in our final report should not be taken as comprehensive or as an opinion on effectiveness since they will be based solely on the audit procedures performed in the audit of the financial statements and the other procedures performed in fulfilling our audit plan.

We welcome the opportunity to discuss our report with you and receive your feedback.

Delsitter LLP

Deloitte LLP Chartered Accountants Glasgow 30 January 2017

This report has been prepared for the Board, as a body, and we therefore accept responsibility to you alone for its contents. We accept no duty, responsibility or liability to any other parties, since this report has not been prepared, and is not intended, for any other purpose.

# Appendices

### Fraud responsibilities and representations Responsibilities explained



#### Your responsibilities

 The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations.

#### **Our responsibilities**

- We are required to obtain representations from your management regarding internal controls, assessment of risk and any known or suspected fraud or misstatement.
- As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.
- As set out in the significant risks section of this document, we have identified the risk of fraud in income recognition and management override of controls as a key audit risk for your organisation.

#### Fraud characteristics

- Misstatements in the financial statements can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the financial statements is intentional or unintentional.
- Two types of intentional misstatements are relevant to us as auditors – misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.

#### We will request the following to be stated in the representation letter signed on behalf of the VJB:

- We acknowledge our responsibilities for the design, implementation and maintenance of internal control to prevent and detect fraud and error.
- We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- We are not aware of any fraud or suspected fraud / We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the entity or group and involves:

(i) management; (ii) employees who have significant roles in internal control; or (iii) others where the fraud could have a material effect on the financial statements.

• We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the entity's financial statements communicated by employees, former employees, analysts, regulators or others.

### Fraud responsibilities and representations (continued)

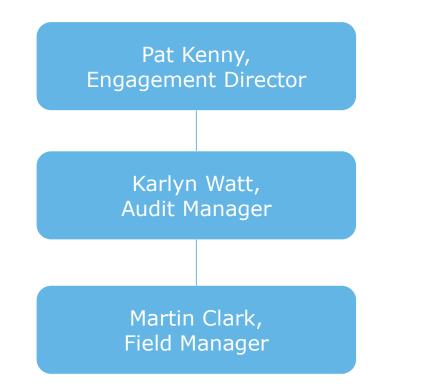


We will make the following inquiries regarding fraud:

Management	Internal Audit & Local Counter Fraud Specialist	Those charged with governance		
Management's assessment of the risk that the financial statements may be materially misstated due to fraud, including the nature, extent and frequency of such assessments.	Whether internal audit and the Local Counter Fraud Specialist has knowledge of any actual, suspected or alleged	How those charged with governance exercise oversight of management's processes for identifying and		
Management's process for identifying and responding to the risks of fraud in the entity.	fraud affecting the entity, and to obtain its views about the risks of fraud.	responding to the risks of fraud in the entity and the internal control that management has established to		
Management's communication, if any, to those charged with governance regarding its processes for identifying and		mitigate these risks.		
responding to the risks of fraud in the entity.		Whether those charged with governance have knowledge of any		
Management's communication, if any, to employees regarding its views on business practices and ethical behaviour.		actual, suspected or alleged fraud affecting the entity.		
Whether management has knowledge of any actual, suspected or alleged fraud affecting the entity.		The views of those charged with governance on the most significant		
We plan to involve management from outside the finance function in our inquiries.		fraud risk factors affecting the entity.		

### Your audit team and timetable We have a highly experienced audit team

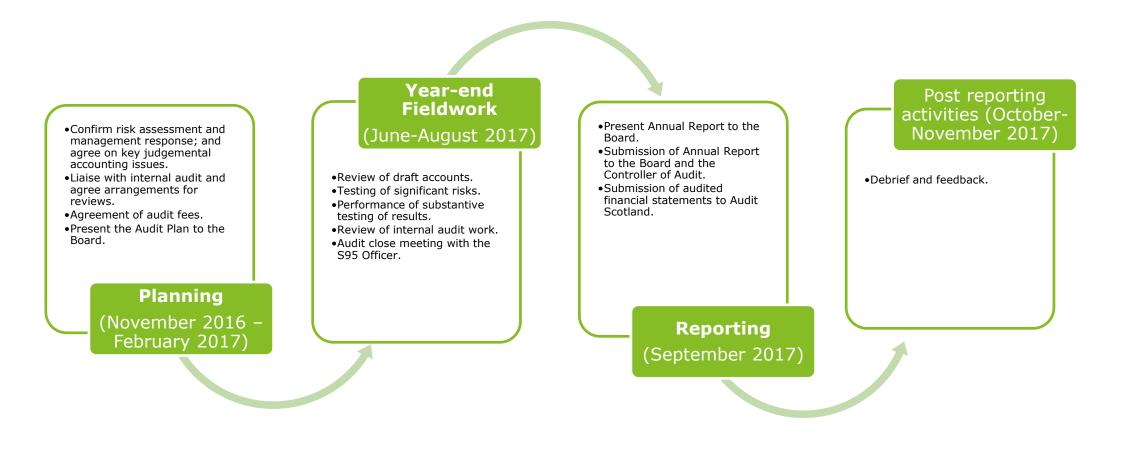
We set out below our audit engagement team. We manage our audit on a basis that it draws on the expertise of our public sector group.



Emma Hammond Senior Consultant Pensions Specialist

### Your audit team and timetable (continued)

Set out below is the approximate expected timing of our reporting and communication with Orkney & Shetland Valuation Joint Board and Audit Scotland.



**Ongoing communication and feedback** 



As part of our obligations under International Standards on Auditing (UK and Ireland), we are required to report to you on the matters listed below:

**Independence confirmation** We confirm we are independent of the VJB and will reconfirm our independence and objectivity to the Board for the year ending 31 March 2017 in our final report to the Board.

#### Fees

The total audit fee for 2016/17, in line with the fee range provided by Audit Scotland in its letter of 12 December 2016, is  $\pounds7,578$ , as analysed below. As agreed with management, we have applied a 10% increase to the auditor remuneration in 2016/17 to reflect the higher input required in year 1 of our appointment, which will be offset by reduced fees in future years on a like for like basis, as illustrated below. The average fee is a 1.7% reduction on the 2015/16 fee.

		For Illustrative purposes				
	+10%	+5%	-	-5%	-10%	
	2016/17	2018/19	2019/20	2020/21	2021/22	Average
Auditor remuneration	6,688	6,384	6,080	5,776	5,472	6,080
Audit Scotland fixed charges:						
Pooled costs	530	530	530	530	530	530
Audit support costs	360	360	360	360	360	360
Total Fee	7,578	7,274	6,970	6,666	6,362	6,970

Details of all non-audit services fees for the period will be presented in our final report.

## Non-audit services

In our opinion there are no inconsistencies between APB Ethical Standards for Auditors and the company's policy for the supply of non-audit services or any apparent breach of that policy. We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.

### Technical developments

### Sector developments



Code of practice on local authority accounting in the UK 2016/17	<ul> <li>The main changes in this edition of the Code are as follows:</li> <li>The new requirement for an expenditure and funding analysis.</li> <li>Revised formats and reporting requirements for the comprehensive income and expenditure statement and movement in reserves statement. Authorities are now required to present service analysis based on the organisation structure under which they operate.</li> <li>Amendments in respect of accounting and reporting by pension funds.</li> <li>Other changes relate to amendments to IFRS, the annual governance statement, and the new conceptual framework for public bodies.</li> </ul>
2016/17 SeRCOP	Changes have been made to the social work Service Expenditure Analysis (SEA) in respect of the integration of health and social care. There is a new division of service for the contribution to integration joint boards that should be separately presented on the face of the comprehensive income and expenditure statement. As noted above, the accounting code has been amended to instead require the income and expenditure analysis to be based on the authority's organisation structure
Revised good governance framework	CIPFA and Solace have issued a revised framework for good governance in local government from 2016/17. <i>Delivering Good Governance in Local Government Framework 2016</i> defines the principles that should underpin the governance of each local government organisation. It provides a structure to help individual authorities with their approach to governance. Local authorities are required to prepare an annual governance statement in order to report publicly on the extent to which they comply with their own code of governance, which in turn is consistent with the good governance principles in the framework.
Revised statement on CFO role in local government	CIPFA has issued a revised statement on the role of the chief financial officer in local government which aims to give detailed advice on how to apply within local government the overarching statement on the role of the public service chief finance officer (CFO). The <i>Delivering Good Governance in Local Government Framework</i> requires authorities to ensure that their financial management arrangements conform with this statement, or explain why they do no and how they deliver the same impact.

### Our approach to quality AQR team report and findings

#### Audit quality and regulation

We pride ourselves on our commitment to quality and our quality control procedures. We have an unyielding pursuit of quality in order to deliver consistent, objective and insightful assurance.

In May 2016 the Financial Reporting Council ("FRC") issued individual reports on each of the six largest firms, including Deloitte, on Audit Quality Inspections which provides a summary of the findings of its Audit Quality Review ("AQR") team for the year ended 31 March 2016. We adopt an open and communicative approach with the regulator and their report is an accurate reflection of our efforts to improve audit quality across our practice over a number of years.

The review performed by the AQR forms an important part of our overall inspection process. We perform causal factor analysis on each significant finding arising from both our own internal quality review and those of our regulators to identify the underlying cause. This then drives our careful consideration of each of the FRC's comments and recommendations, as well as findings arising from our own reviews to provide further impetus to our quality agenda.

18 of the audits reviewed by the AQR were performed to a good standard with limited improvements required and four audits required improvements. No audits were assessed as requiring significant improvements. We have already taken action to respond to the key themes of the report and will continue to undertake further inputs to our audit quality improvement programmes to embed the changes into our practice.

#### The AQR's conclusion on Deloitte

"We reviewed selected aspects of 22 individual audits in 2015/16. In selecting which aspects of an audit to inspect, we take account of those areas identified to be of higher risk by the auditors and Audit Committees, our knowledge and experience of audits of similar entities and the significance of an area in the context of the audited financial statements.

In response to our last inspection report, the firm has made a number of improvements to its policies and procedures:

- The firm's guidance regarding the testing of journals has been enhanced.
- Additional sector-specific training was provided for individuals involved in financial services audits, together with additional training on internal controls for all audit staff.
- The firm has made a number of improvements to its internal monitoring process, including the development of a moderation process in order to increase consistency.

Our key findings in the current year requiring action by the firm are that the firm should:

- Improve the extent of challenge of management in relation to areas of judgment, in particular for impairment reviews and judgmental valuations.
- Improve aspects of its audit approach in the areas of revenue and inventory.
- Ensure high quality reporting to Audit Committees is achieved on a consistent basis.
- Strengthen its audit approach in relation to defined benefit pension scheme balances and disclosures.
- Strengthen its policies and procedures regarding the engagement quality control review process."

#### 2015/16 Audit Quality Inspection Report on Deloitte LLP

### Our approach to quality (continued) AQR team report and findings (continued)

#### **Review of individual audits**

The following chart provides a summary of the AQR's assessment of the quality of our individual audits inspected in 2015/16, with comparatives for the previous 4 years. The chart also shows the 5 year average of Deloitte and the 5 year average of the 6 largest firms inspected by the AQR (which comprises Deloitte LLP, Ernst & Young LLP, KPMG LLP, PricewaterhouseCoopers LLP, BDO LLP and Grant Thornton UK LLP).

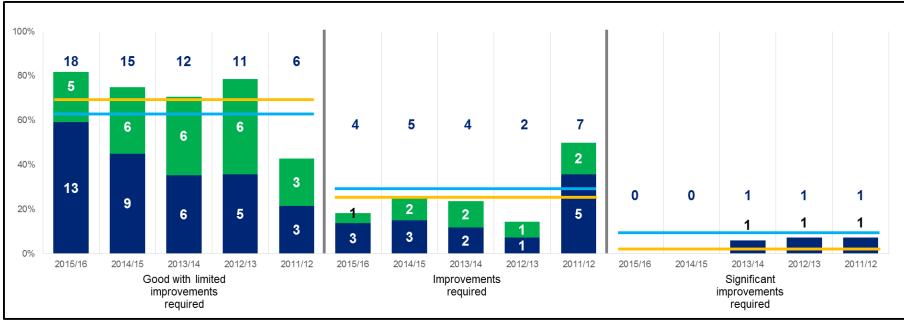
The AQR categorises audits as either:

- · Good with limited improvements required
- Improvements required
- Significant improvements required

Changes to the proportion of audits reviewed falling within each grade from year to year reflect a wide range of factors, which may include the size, complexity and risk of the individual audits selected for review and the scope of the individual reviews. For this reason, and given the sample sizes involved, changes in gradings from one year to the next are not necessarily indicative of any overall change in audit quality at the firm.

All the AQR public reports on individual firms are available on its website <u>https://www.frc.org.uk/Our-Work/Conduct/Audit-Quality-Review/Audit-firm-specific-reports.aspx</u>





# **Deloitte.**

Other than as stated below, this document is confidential and prepared solely for your information and that of other beneficiaries of our advice listed in our engagement letter. Therefore you should not, refer to or use our name or this document for any other purpose, disclose them or refer to them in any prospectus or other document, or make them available or communicate them to any other party. If this document contains details of an arrangement that could result in a tax or National Insurance saving, no such conditions of confidentiality apply to the details of that arrangement (for example, for the purpose of discussion with tax authorities). In any event, no other party is entitled to rely on our document for any purpose whatsoever and thus we accept no liability to any other party who is shown or gains access to this document.

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