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## **East Ayrshire Council**

Planning report to the Governance and Scrutiny Committee on the audit for the year ending 31 March 2019

Issued on 14 March 2019 for the meeting on 21 March 2019

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#### Introduction

## The key messages in this report

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.

We have pleasure in presenting our draft planning report to the Governance and Scrutiny Committee of East Ayrshire Council (the Council) for the year ending 31 March 2019 audit. We would like to draw your attention to the key messages of this draft audit plan:

#### **Audit Plan**

We have updated our understanding of the Council including discussion with management and review of relevant documentation from across the Council.

Based on these procedures, we have developed this plan in collaboration with the Council to ensure that we provide an effective audit service that meets your expectations and focuses on the most significant areas of importance and risk to the Council.

#### **Key Risks**

We have taken an initial view as to the significant audit risks the Council faces. These are presented as a summary dashboard on page 17.

• In accordance with auditing standards, we have identified a significant risk associated with income. This risk is pinpointed to the recognition of grant income (excluding Revenue Support Grant and Housing Benefit subsidy grant) as this involves a degree of complexity and management judgement in determining whether or not grant conditions have been met and the income can be recognised in the year. In 2017/18 the total grant income received excluding the Revenue Support Grant and Housing Benefit subsidy grant was £40.7m.

- In accordance with auditing standards, management override of controls has also been identified as a significant audit risk.
- We have also identified the valuation of property assets as a significant risk in line with the prior year given the degree of judgement and complexity involved and its material impact on the financial statements.
- We will follow up on the recommendations made as part of our prior year audit around the processes around property valuations and journal postings to determine if the required improvements have been implemented.

## Introduction (continued)

## The key messages in this report (continued)

#### **Audit Dimensions**

The Code of Audit Practice sets out four audit dimensions which set a common framework for all public sector audits in Scotland. Our audit work will consider how the Council is addressing these and we will report our conclusions in our annual report to the Governance and Scrutiny Committee in September 2019. In particular, our work will focus on:

Financial sustainability – East Ayrshire Council continues to face significant financial challenges. The 2018/19 budget set in February 2018 showed the Council forecasting a breakeven position without the use of reserves due to an increase in Grant Income and Council Tax. The period 10 results, as reported through 'East Ayrshire Performs' is projecting an underspend of £500k. East Ayrshire Integration Joint Board (IJB) is forecasting a slight underspend (£6k) on services commissioned from the Council in the year as outlined in our planning paper to be presented at the IJB Committee meeting on 26 March 2019.

The Council achieved significant savings of £34m with its first Transformation Strategy (2012-2017). It has recognised that if it continues with current service levels and delivery models, there would be a funding gap over the next 5 years. The Council's Medium/Long-Term Plan estimates a funding gap of between £23m and £53m by 2021/22 with the mid-line assessment at approximately £32m. The 2019/20 budget was set in February 2019 and showed the Council forecasting a breakeven position with a savings target of £8.9m.

The new Transformation Strategy (2018-2022), which is aligned to the Community Plan and Single Outcome Agreement, will require the council to make major changes to the way it provides services. Details of such transformative activity were approved by the Council in June 2018.

We will monitor the Council's actions in respect of its Transformation Plan and Medium/Long-Term Strategy set in June 2018 to assess whether short term financial balance can be achieved and whether the Council will be able to support, monitor and deliver the desired outcomes through these strategies. Currently, there is a risk around how benefits are realised from service redesign projects and how this impacts on achieving financial targets.

**Financial management** – we will review the budget and monitoring reports to the Council during the year and liaise with internal audit in relation to their work on the financial control environment to assess whether financial management and budget setting is effective.

From our audit work in 2017/18 we found that the Council had effective financial planning and management arrangements in place. However, there remains a risk that a lack of appropriate financial management could result in the Council not achieving its financial targets.

We also noted from our 2017/18 audit work that the Council's spending is clearly linked to its priorities but it could improve how it demonstrates the impact that spending makes to these priority areas. We will follow up the progress of this during 2018/19.

#### Introduction (continued)

## The key messages in this report (continued)

Governance and transparency – from our review of Council papers and attendance at Governance and Scrutiny Committees we will assess the effectiveness of governance arrangements and Governance and Scrutiny Committee attendance. We will also review the governance arrangements in relation to IJB as there is a risk that the governance arrangements between the Council and the IJB (and the partner NHS Board) are not effective.

Value for money – from our 2017/18 audit work we concluded that the Council had a well established performance management framework in place, with performance regularly considered by management and the Council. During 2018/19 we will review how the Council is addressing areas where targets are not being met.

Our audit work on the four audit dimensions incorporates the specific risks highlighted by Audit Scotland, in particular, the impact of EU withdrawal, the changing landscape for public financial management, dependency on key suppliers, care income and increased focus on openness and transparency.

#### **Best Value and Strategic Audit Priorities**

As part of our best value work, we will consider the five Strategic Audit Priorities agreed by the Accounts Commission and update our assessment of the Council's performance established from our audit work over the last two years against these priorities.

We will also look to follow up on recommendations made in the Best Value Assurance Report published in May 2018.

#### Introduction (continued)

## The key messages in this report (continued)

#### **Regulatory Change**

New accounting standards on revenue and financial instruments will apply for 2018/19, and for leases from 2020/21. While we do not expect these standards to have a significant impact on Councils, we recommend that the Council review the impact of IFRS 9 and 15, including calculating any adjustments that will be required as at 31 March 2018 for transition. We would suggest that the Governance and Scrutiny Committee receive reporting in year from management on the implementation of the new standard, and we will report specifically on the findings from our audit work in this area.

We have reported on other regulatory changes in our sector updates in our separate report.

#### **Our Commitment to Quality**

We are committed to providing the highest quality audit, with input from our market leading specialists, sophisticated data analytics and our wealth of experience.

#### **Adding value**

Our aim is to add value to the Council through our external audit work by being constructive and forward looking, by identifying areas of improvement and by recommending and encouraging good practice. In this way, we aim to help the Council promote improved standards of governance, better management and decision making and more effective use of resources.

Pat Kenny Audit director

#### Responsibilities of the Governance and Scrutiny Committee

## Helping you fulfil your responsibilities

The primary purpose of the Auditor's interaction with the Governance and Scrutiny Committee:

- Clearly communicate the planned scope of the financial statements audit
- Provide timely observations arising from the audit that are significant and relevant to the Governance and Scrutiny Committee's responsibility to oversee the financial reporting process
- In addition, we seek to provide the Governance and Scrutiny Committee with additional information to help fulfil your broader responsibilities

We use this symbol throughout this document to highlight areas of our audit where the Committee need to focus their attentions.

**Ø** 

As a result of regulatory change in recent years, the role of the Governance and Scrutiny Committee has significantly expanded. We set out here a summary of the core areas of Governance and Scrutiny Committee responsibility to provide a reference in respect of these broader responsibilities and highlight throughout the document where there is key information which helps the Governance and Scrutiny Committee in fulfilling its remit.

- At the start of each annual audit cycle, ensure that the scope of the external audit is appropriate.
- Implement a policy on use of the external auditor for nonaudit services and approve these services if they arise.
- Review the internal control and risk management systems.
- Explain what actions have been, or are being taken to remedy any significant failings or weaknesses.
- Oversee the work of the Council's local counter fraud service.

Oversight of key external audit

Integrity of reporting

Internal controls and risks

Oversight of internal audit

Whistle-blowing and fraud

- Ensure that appropriate arrangements are in place for the proportionate and independent investigation of any concerns that are raised by staff in connection with improprieties.

- Make an impact assessment of key judgements and the level of management challenge.
- Review the external audit findings, key judgements and level of misstatements.
- Assess the quality and capacity of the internal team.
- Assess the completeness of disclosures, including consistency with disclosures on business model and strategy and, where requested by the Council, provide advice in respect of the fair, balanced and understandable statement.
- Assess and advise the Council on the appropriateness of the Annual Governance Statement.
- Consider annually whether the scope of the internal audit programme is adequate.
- Monitor and review the effectiveness of the internal audit activities.

#### Our audit explained

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

## **Identify changes in your Council and environment**

The Council continues to face significant financial pressures due to an increase in costs and demand for services as well as a risk of reduced available funding.

The integration of health and social care also continues to be a challenge, as discussed in page 11.

#### **Scoping**

Our scope is in line with the Code of Audit Practice issued by the Audit Scotland.

More detail is given on pages 13-14.

#### In our final report

In our final report to you we will conclude on the significant risks identified in this paper, report to you our other findings, and detail those items we will be including in our audit report.

Identify
Changes
in your
business and
environment

Determine materiality

**Scoping** 

Significant risk assessment Conclude on significant risk areas

Other findings

Our audit report

#### **Determine materiality**

We have determined a group materiality of £8,062k (2017/18: £7,281k) with a performance materiality of £6,046k (2017/18: £5,460k). This is based on prior year gross expenditure adjusted for net contributions made to the IJB.

For the audit of East Ayrshire Council (Council only) a materiality of £8,055k (2017/18: £7,150k) has been determined, with performance materiality of £6,041k (2017/18: £5,362k).

We will report to you any misstatements above £250k (2017/18: £250k). More detail given on page 12.

#### Significant risk assessment

We have identified significant audit risks in relation to the Council. More detail is given on pages 16-20. These significant risks are consistent with those identified in our prior year audit.

## Quality and Independence

We confirm all Deloitte network firms are independent of the Council. We take our independence and the quality of the audit work we perform very seriously. Audit quality is our number one priority.

# Continuous communication and reporting Planned timing of the audit

#### **Planning**

- Planning meetings to inform preliminary risk assessment and identify judgemental accounting issues.
- Update understanding of key business cycles and changes to financial reporting.
- Document design and implementation of key controls for significant risks.
- Review of key Council documents including Committee minutes.
- Planning work for wider scope responsibilities.

#### **Interim**

- Initiate substantive procedures addressing significant risk around management override of control.
- Update and complete detailed risk assessments based on most recent financial results and considering any developments since the planning phase.
- Complete wider scope procedures.
- Completion of NFI questionnaire.

#### Year end fieldwork

- Review of draft accounts.
- Substantive testing of all material areas.
- Detailed review of annual accounts and report, including Annual Governance Statement.
- Review of final internal audit reports and opinion.
- Completion of testing on significant audit risks.
- Submission of certified grant claims.

#### Reporting

- Final Governance and Scrutiny Committee meeting.
- Issue final Annual Report to the Council and the Controller of Audit.
- Issue audit report and submission of audited financial statements to Audit Scotland (including charitable trusts).
- Issue audited Whole of Government Accounts (WGA).
- Completion of Minimum Data Set.
- Audit feedback meeting.

#### **Audit Team**

Pat Kenny, Audit Director

Karlyn Watt, Senior Manager

Martin Clark, Manager

2018/19 Audit Plan

Final report to the Audit Committee

**November** 

9

February-June

July - August

**September** 

Ongoing communication and feedback

## An audit tailored to you

## Focusing on your business and strategy

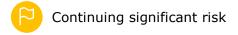
#### Impact on our audit

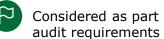
**Future** financial strategy and sustainability



The Council continues to face significant financial challenges in the medium to longer term. Whilst a breakeven position is projected for 2018/19 without the need to use reserves the council recognises that if it continues with current service levels and delivery models, there will be a funding gap over the next five years. Based on a number of assumptions, including grant funding, council tax, pay inflation, demand pressures and known policy positions, it has estimated that it is faced with a funding gap of between £23m and £53m by 2021/22 with the mid-line assessment at approximately £32m.

The new Transformation Strategy (2018-2022), which is aligned to the Community Plan and Single Outcome Agreement, will require the Council to make major changes to the way it provides services. Details of such transformative activity were approved by the Council in June 2018. Progress with the Transformation Strategy will be a key area of focus in our wider scope audit work.





## An audit tailored to you (continued)

## Focusing on your business and strategy (continued)

#### Impact on our audit

Health and social care integration



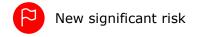
2017/18 was the third full financial year of the Health and Social Care Partnership between NHS Ayrshire and Arran and the East Ayrshire Council through the IJB. The final position for 2017/18 was an underspend against budget of £501k following additional non-recurring funding of £2.205m received from the Council.

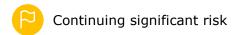
An indicative balanced 2018/19 budget was approved by the IJB on 26 April 2018, albeit the NHS did not confirm its delegated budget until June 2018. This comprised a Council managed budget of £87.5m and an NHS managed budget of £140.6m, giving an IJB total of £228.1m.

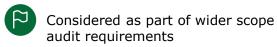
As reported in our IJB annual audit report for 2017/18, a key issue is the need to develop a fully integrated IJB budget, incorporating the set aside budget, rather than viewing it as two separate budgets from the Council and NHS.

Going forward, the partnership recognises that increasing demand, less money and the need to make savings mean that it needs to think and work differently. The IJB approved a medium-term financial plan (2017/18 – 2021/22) for the partnership in November 2017. The plan identified an indicative budget gap of around £38m to 2021/22, with around £21m of this gap needing to be delivered by radically transforming how the IJB provides services.

We will continue to review the work being done both at the Council and the IJB to address such funding gaps.







## Materiality

## Our approach to materiality

#### **Basis of our materiality benchmark**

- The audit director has determined materiality for the group as £8,062k (2017/18: £7,281k) and a performance materiality of £6,046k (2017/18: £5,460k), based on professional judgement and risk factors specific to East Ayrshire Council, the requirement of auditing standards and the financial measures most relevant to users of the financial statements.
- We have used 1.6% of prior year gross expenditure adjusted for net contributions to the IJB as the benchmark for determining materiality and applied 75% as performance materiality.
- For the audit of East Ayrshire Council (Council only) a materiality of £8,055k (2017/18:£7,150k) has been determined, and performance materiality of £6,041k (2017/18: £5,362k).

#### Reporting to those charged with governance

- We will report to you all misstatements found in excess of our clearly trivial threshold which is £250k (2017/18: £250k) for both the group and Council only.
- We will report to you misstatements below this threshold if we consider them to be material by nature.

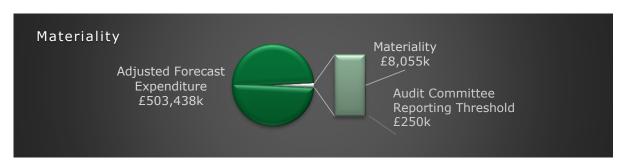
#### Our annual audit report

#### We will:

- report the group materiality, Council only materiality and the range we use for component materialities;
- provide comparative data and explain any changes in materiality, compared to prior year, if appropriate; and
- explain any normalised or adjusted benchmarks we use, if appropriate.

#### **Group scoping**

In addition to performing full audit procedures for East Ayrshire Council, we will also perform a full audit as auditors of the Integration Joint Board which is a material component to the Council. In addition, the Strathclyde Partnership for Transport is also a material component, therefore we will liaise with its auditors to gain assurance over the balances consolidated. All other components are immaterial and will be covered by desktop reviews at the group level.



Although materiality is the judgement of the Audit Director, the Governance and Scrutiny Committee must satisfy themselves that the level of materiality chosen is appropriate for the scope of the audit.

## Scope of work and approach

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

Core audit work	Planned output	Timeline
Perform an ISA (UK) compliant audit of the annual accounts	<ul><li>Annual audit plan</li><li>Interim report (if required)</li><li>Independent auditor's report</li></ul>	<ul><li>February 2019</li><li>May/June 2019</li><li>September 2019</li></ul>
Audit and report on the audit dimensions	<ul><li>Annual audit plan</li><li>Annual audit report</li></ul>	<ul><li>February 2019</li><li>September 2019</li></ul>
Contribute to performance audits (including performance audit reports, overview reports and impact reports)	<ul><li>Minimum datasets</li><li>Data returns</li></ul>	<ul><li>September 2019</li><li>As required</li></ul>
Share audit intelligence with Audit Scotland including highlighting potential statutory reports	Current issues returns	<ul> <li>January, March, August and October 2019</li> </ul>
Provide assurance on Whole of Government Accounts (WGA)	Assurance statement on WGA returns	September 2019
Carry out preliminary enquiries into referred correspondence	• None	• N/A
Provide information on cases of fraud	Fraud returns	<ul> <li>November 2018, February, May and August 2019</li> </ul>
Provide information on cases of money laundering	Audit Scotland to advise	As required
Contribute to National Fraud Initiative (NFI) report	<ul> <li>NFI audit questionnaire</li> <li>Reference, if necessary, in annual audit report</li> </ul>	• June 2019
Contribute to technical guidance notes	Consultation comments on draft technical guidance notes	As required
Contribute to technical databases	Database returns	• July 2019

## Scope of work and approach (continued)

Our key areas of responsibility under the Code of Audit Practice (continued)

Core audit work	Planned output	Timeline
Audit and report on Best Value	Annual audit report	September 2019
Consider and report on the Strategic Audit Priorities	<ul><li>Annual audit plan</li><li>Annual audit report</li></ul>	<ul><li>February 2019</li><li>September 2019</li></ul>
Lead the Shared Risk Assessment	<ul> <li>Any locally agreed output</li> </ul>	As required
Carry out Statutory Performance Information work	<ul><li>Annual audit plan</li><li>Annual audit report</li></ul>	<ul><li>February 2019</li><li>September 2019</li></ul>
Certify grant claims	<ul> <li>Certificate in support of grant claims</li> </ul>	As required
Liaise with housing benefit performance auditor	• None	• N/A

## Scope of work and approach (continued)

#### Our approach

#### Liaison with internal audit

The Auditing Standards Board's version of ISA (UK) 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.

We will review their reports and meet with them to discuss their work. We will discuss the work plan for internal audit, and where they have identified specific material deficiencies in the financial control environment we consider adjusting our testing so that the audit risk is covered by our work.

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

#### 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.

Obtain an understanding of the Council and its that address environment including the identification of relevant controls.

Identify risks Carry out and controls those risks.

"design and implementation" the operating work on relevant controls.

If considered necessary, test effectiveness of selected controls.

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

#### 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 accounts in the UK disclosure checklist to support the Council in preparing high quality drafts of the annual report and financial statements, which we would recommend the Council complete during drafting.

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

Audit Scotland has published good practice guides in relation to the Annual Accounts and the Annual Governance Statement to support the Council in preparing high quality drafts of the Annual Report and financial statements, which we would recommend the Council consider during drafting.

#### Significant risks

#### Our risk assessment process

We consider a number of factors when deciding on the significant audit risks. These factors include:

- the significant risks and uncertainties from our knowledge on working on previous audits;
- the IAS 1 critical accounting estimates previously reported in the annual report and financial statements;
- · our assessment of materiality;
- the changes that have occurred in the business and the environment it operates in since the last annual report and financial statements; and
- the Council's actual and planned performance on financial and other governance metrics compared to its peers.

#### Principal risk and uncertainties

- · Level of Grant Funding
- · Local Economic Climate
- EU Withdrawal
- Equal Pay, Equal Value and Holiday Pay claims
- Open Cast Coal Mines Liability
- · Cyber Attack Susceptibility

#### IAS 1 Critical accounting estimates

- Opencast mines potential liability
- Future levels of funding
- · Support costs, capital and pension costs

The next page summarises the significant risks that we will focus on during our audit. All the risks mentioned in the prior year Governance and Scrutiny Committee report are included as significant risks in this year's audit plan.



## Dashboard

Risk	Material?	Fraud risk identified?	Planned approach to controls testing	Level of management judgement	Page no.
Recognition of grant income	$\bigcirc$	$\bigcirc$	Design and implementation		18
Management override of controls	$\bigcirc$	$\bigcirc$	Design and implementation		19
Valuation of property assets	$\bigcirc$	$\otimes$	Design and implementation		20



Some degree of management judgement



Limited management judgement

## Risk 1 – Recognition of grant income

#### Risk identified

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.

Key components of income for the Council are summarised in the table below. The Revenue Support Grant and non-domestic rates income which are directed by the Scottish Government and not considered a significant risk as the process for receipt of this income are not complex and can be verified 100%. Council tax and housing rent income are set through the annual budget process with no management judgement and therefore have a low risk of fraud. Similarly, other service income includes fees and charges across all services, which are set through formal approval processes, with no history of fraud or error.

The significant risk is pinpointed to the recognition of grant income, comprising capital grants and contributions and service specific grants.

Grant income is a significant risk due to:

- management judgement in determining if there are any conditions attached to a grant and if so whether the conditions have been met; and
- complex accounting for grant income as the basis for revenue recognition in the accounts will depend on the scheme rules for each grant.

Type of income	2017/18 (£m)	Significant risk
<u>Taxation and Non-Specific Grant</u> <u>Income</u>		
Council tax income	46.0	
Non domestic rates	29.4	
Revenue Support Grant	191.0	
Capital grants and contributions	14.7	✓
Service Income		
Service specific grant income	28.0	✓
Housing rent income	45.2	
IJB commission income	97.2	
Other service income	44.1	
Housing benefit subsidy	40.7	

#### Our response

We will perform the following:

- assess management's controls around recognition of grant income; and
- test a sample of capital grants and contributions and grant income credited to service income and confirm these have been recognised in accordance with any conditions applicable.

## Risk 2 – Management override of controls

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

#### Risk identified

In accordance with ISA 240 (UK) management override is a significant risk. This risk area includes the potential for management to use their judgement to influence the financial statements as well as the potential to override the Council's controls for specific transactions.

The key judgments in the financial statements are those which we have selected to be the significant audit risks around recognition of grant income and valuation of property assets. This is inherently the areas in which management has the potential to use their judgment to influence the financial statements.

## Planned audit challenge

In considering the risk of management override, we plan to perform the following audit procedures that directly address this risk:

#### Journal testing

- · We will test the design and implementation of controls over journal entry processing.
- Using our Spotlight data analytics tool, we will risk assess journals and select items for detailed follow up testing.
   The journal entries will be selected using computer-assisted profiling based on areas which we consider to be of increased interest.
- We will test the appropriateness of journal entries recorded in the general ledger, and other adjustments made in the preparation of financial reporting.

#### **Accounting estimates**

- We will test the design and implementation of controls over key accounting estimates and judgements.
- We will review accounting estimates for biases that could result in material misstatements due to fraud. This will
  include both a retrospective review of 31 March 2018 estimates and a review of the corresponding estimates as
  at 31 March 2019.

#### Significant and unusual transactions

• We will obtain an understanding of the business rationale of significant transactions that we become aware of that are outside of the normal course of business for the entity, or that otherwise appear to be unusual, given our understanding of the entity and its environment.

## Risk 3 – Valuation of property assets

We will engage Deloitte Real Estate specialists to assist our testing of the revaluation of the £797m property asset portfolio.

#### Risk identified

The Council held £796,784k of property assets at 31 March 2018. The financial year to 31 March 2019 will represent year one of a five year rolling programme in which 20% of the portfolio will be revalued.

The Council is required to hold property assets within Property, Plant and Equipment at a modern equivalent use valuation. The valuations are by nature significant estimates which are based on specialist and management assumptions and which can be subject to material changes in value.

Given the level of judgement required for such a high-value asset class and from our experience of testing the PPE balance, we deem there to be a significant risk attached to the valuation of PPE.

## Planned audit challenge

We will test the design and implementation of key controls in place around the property valuation.

We will engage early with the Council, using our valuation specialists to challenge the assumptions applied by management in the valuations.

We will use our valuation specialists, Deloitte Real Estate, to review and challenge the appropriateness of the assumptions used in the year-end valuation of the Council's Land and Buildings, including considering movements compared to those of other Council's performing valuations for 2018/19.

For valuations performed prior to the year end, where the valuer confirms to the Council that there are no significant differences between the valuation date and 31 March 2019, we will challenge whether any potential impact of a "Brexit shock" (depending on the final deal outcome) has been included in the estimates and judgements, owing to the timing of the Brexit date and year end date.

## Wider scope requirements

#### Audit dimensions

The Code of Audit Practice sets out four audit dimensions which set a common framework for all public sector audits in Scotland. We will consider how the Council in addressing these areas, including any risks to their achievement, as part of our audit work as follows:

Audit dimension	Areas to be considered	Impact on the 2018/19 Audit
Financial sustainability 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> <li>Workforce planning.</li> </ul>	From our work in 2017/18, we found that the council has a clear process in place for its long-term and medium-term financial planning. As discussed on Page 4, the council has achieved significant savings over the last 5 years through its Transformation Strategy and looks to continue to transform service delivery through its new Transformation Strategy programme, reported to Council in June 2018.  We will assess the progress made in implementation of the new Transformation Strategy as part of our 2018/19 audit.  Audit Risk: There is a risk that the objectives of Transformation Strategy are not met and financial balance is not achieved.  In view of the Scottish Government's Medium Term Financial Strategy (MTFS) (discussed further on page 25) we will consider the extent to which the Council has reviewed the potential implications of the MTFS for its own financial planning and whether it is taking these into account in its arrangement for financial management and financial sustainability.  Audit Risk: The Council's long-term financial planning is inconsistent with the Scottish Governments five-year plan.

## Audit dimensions (continued)

Audit dimension	Areas to be considered	Impact on the 2018/19 Audit
Financial management is concerned with financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively	<ul> <li>Systems of internal control.</li> <li>Budgetary control system.</li> <li>Financial capacity and skills, including plans for replacing the recently departed Head of Finance.</li> <li>Arrangements for the prevention and detection of fraud.</li> </ul>	Through the understanding we have gained of the Council financial management processes from prior year audits, we are satisfied that the council has strong budget setting and financial monitoring arrangements in place.  In view of the Scottish Government's new budget process (discussed further on page 25) we will confirm that underlying financial performance including any in-year changes to funding agreed with the Scottish Government, is transparently presented.  Audit Risk: The underlying financial performance of the Council is not transparently reported.  Our fraud responsibilities and representations are detailed on pages 36 and 37.

## Audit dimensions (continued)

Audit dimension	Areas to be considered	Impact on the 2018/19 Audit
Governance and transparency is concerned with the effectiveness of scrutiny and governance arrangements, leadership and decision making, and transparent reporting of financial and performance information.	<ul> <li>Governance arrangements.</li> <li>Scrutiny, challenge and transparency on decision making and financial and performance reports.</li> <li>Quality and timeliness of financial and performance reporting.</li> </ul>	We will review the financial and performance reporting to the Council during the year as well as minutes of all Council and key Committee meetings to assess the effectiveness of the governance arrangements both in the Council and the IJB. Our attendance at Governance and Scrutiny Committees will also inform our work in this area.  In view of the increased focus on how public money is used and what is achieved (as discussed further on page 25), we will consider how the Council has reviewed its approach to openness and transparency.  Audit Risk: The Council's approach is not keeping pace with public expectation and good practice.
Value for money is concerned with using resources effectively and continually improving services.	<ul> <li>Value for money in the use of resources.</li> <li>Link between money spent and outputs and the outcomes delivered.</li> <li>Improvement of outcomes.</li> <li>Focus on and pace of improvement.</li> </ul>	From our 2017/18 audit work we concluded that the Council had a well established performance management framework in place, with performance regularly considered by management and the Council. In 2017/18, the council reported improvement in more than two-thirds of the indicators they use to monitor performance against their priorities.  In view of the Scottish Government's new budget process (discussed further on page 25) we will consider the extent to which the Council performance report provides an accessible account of the Council's overall performance and impact of its public spending.  Audit Risk: The Council does not clearly report on its contribution towards the national outcomes.

## Specific risks

As part of the 2018/19 planning guidance, Audit Scotland have identified the following areas as significant risks faced by the public sector. Any specific risks in relation to these areas for East Ayrshire Council have been included in our audit risk under the audit dimensions, discussed on the previous pages. We will continue to monitor these areas as part of our audit work.

#### Risk

#### EU withdrawal

There are uncertainties surrounding the terms of the UK's withdrawal from the European Union in March 2019. Some arrangements have been provisionally agreed, such as a transition period to the end of 2020, although they are dependent on a final deal being reached between the UK Government and the remaining EU countries. The outcome of negotiations should become clearer in the weeks up to March 2019.

Whatever the outcome, EU withdrawal will inevitably have implications for devolved government in Scotland and for audited bodies. Audit Scotland has identified three areas where EU withdrawal may have the most significant impact as summarised below:

- **Workforce** Many public services are dependent on workers from EU countries, including health, social care and education. A decline in migration from the EU could potentially result in vacancies and skills gaps in some areas of the public sector. There is a risk that this could impact on some public bodies' ability to deliver 'business as usual' particularly given existing workforce and service pressures.
- **Funding** Funding from the EU makes an important contribution to the Scottish public sector. The main sources of funding provide support to farmers and rural businesses, projects to encourage economic growth and support for research and education. The UK Government has made guarantees to meet some funding commitments to the end of existing programmes, but there are uncertainties about what any replacement funding may look like.
- **Regulation** The EU Withdrawal Bill will transpose existing EU law into UK law immediately after the UK leaves the EU. Legislation in many devolved areas will transfer to the Scottish Parliament. The UK government has identified 24 devolved policy areas where it seeks to retain temporary control until UK-wide common legislative frameworks are developed. This is currently an area of contention between the Scottish and UK Governments and is under consideration by the Supreme Court.

In addition, some public bodies may be affected directly by changes to trade and customs rules, which could impact on supply chains and the procurement of goods or services from EU countries. This could influence the availability and cost of supplies and services (e.g. specialist medical equipment or drugs) with potential implications for public bodies' finances and their ability to deliver specific services.

While there are considerable uncertainties about the detailed implications of EU withdrawal, at a minimum by the end of 2018/19, we would expect public bodies to have assessed the potential impact of EU withdrawal on their operations and identified any specific risks and how they will respond to them. We will assess how the Council has prepared for EU withdrawal and how it continues to respond to any emerging risk after March 2019. Some suggested key questions for the Audit Committee are included in our separate Sector Update paper.

In addition, in accordance with the FRC guidance, the Council should consider the <u>disclosure within its annual report</u>, distinguish the specific and direct challenges that it faces from the broader economic uncertainties. In some circumstances this may mean <u>recognising or re-measuring</u> certain items in the Balance Sheet. A comprehensive <u>post balance sheet events</u> review must be reflected in accounts and disclosures.

## Specific risks (continued)

#### Risk

# Changing landscape for public financial management

Scottish public finances are fundamentally changing, with significant tax-raising powers, new powers over borrowing and reserves, and responsibility for 11 social security benefits worth over £3 billion a year. This provides the Scottish Parliament with more policy choices but also means that the Scottish budget is subject to greater volatility, uncertainty and complexity.

Parliamentary scrutiny of the public finances is increasingly important in this changing landscape. A new Scottish budget process has been introduced, which is based on a year-round continuous cycle of budget setting, scrutiny and evaluation. This involves parliamentary committees looking back to explore what public spending has achieved, looking forward to longer-term objectives and challenges, and considering what this should mean for future budgets.

As part of the new budget process, the Scottish Government published an initial five-year Medium-Term Financial Strategy (MTFS) in May 2018. This five-year outlook for the Scottish budget provides useful context for audited bodies' financial planning. As part of our wider scope audit work on financial management and financial sustainability (discussed further on page 21-22), we will consider how East Ayrshire Council has reviewed the potential implications of the MTFS for its own finances, including longer-term financial planning.

The new budget process places greater emphasis on assessing outcomes and the impact of spending. There is an expectation that the Scottish Government and public bodies will report on their contributions towards the national outcomes in their published plans and performance reports, including their annual reports. Increased complexity and volatility is also likely to mean that the Scottish Government will be increasingly active in managing its overall budget position in-year, engaging with public bodies closely on their anticipated funding requirements. As part of our wider scope audit work on financial sustainability and value for money (discussed further on page 23) we will consider the extent to which East Ayrshire Council's performance report provides an accessible account of the body's overall performance and impact of its public spending. We will also confirm that underlying financial performance, including any in-year changes to funding agreed with the Scottish Government, is transparently presented.

## Specific risks (continued)

#### Risk

# Care income, financial assessments and financial guardianship

From our experience of Local Government audits, there may be wider issues with the systems and processes for collecting care income, undertaking financial assessments on individuals receiving care and financial guardianship.

In some cases, responsibility for financial assessment on those receiving care has transferred from social care to finance and this has revealed issues with backlogs of financial assessment and under-recovery of care charges over long periods. Each individual case may have different circumstances contributing to a delay and some of these delays are not within the councils' control, but there are examples where inadequate focus on this area has led to delays that are attributable to the council. After taking legal advice, Audit Scotland does not believe these statutory debts are subject to prescription periods, so are generally collectable even where delays are considerable. In some cases, the Council will take charge over property, where income is insufficient to meet care costs.

We will undertake a review of the arrangements for financial assessment of those requiring care and assess whether these are subject to a significant backlog and the reporting of this.

Audit Scotland has also identified that officers within the Council may be operating as financial guardians for individuals with a lack of capacity to act in their own interest. This financial guardianship role is distinct from a welfare guardian (usually the chief social work officer) and is subject to approval by a Sherriff. Financial guardianship by a council officer is the solution of last resort when no other member of a family, friend, neighbour or local solicitor is willing to act in this role. This may give risk to a potential conflict of interest when finance officers are in a senior position and the council is issuing invoices to a person for their care and the officer is also acting as financial guardian for the individual.

We will be requested to complete a questionnaire to provide intelligence on the extent to which officers undertake financial guardianship roles and the reasons for this.

## Specific risks (continued)

Risk	
Dependency on key suppliers	It has become clear that the collapse of Carillion has had a significant impact across the public sector. This has brought into focus the risk of key supplier failure and the risk of underperformance in suppliers that are experiencing difficult trading conditions. The risk exists on two levels:
	<ul> <li>Individual public sector bodies are dependent on key suppliers; and</li> <li>The Scottish public sector as a whole is subject to significant systematic risk.</li> </ul>
	We will determine as part of our detailed risk assessment the extent to which East Ayrshire Council is dependent on key supplier relationships. Where dependency is significant, we will consider this as part of our audit work and report back to the Governance and Scrutiny Committee.
	We will also be requested to complete a short questionnaire to establish the extent, value and nature of key supplier dependencies that can inform the national position.
Openness and transparency	There is an increasing focus on how public money is used and what is achieved. In that regard, openness and transparency supports understanding and scrutiny. We will consider this as part of our wider scope work on governance (discussed further on page 23).
	We would expect to see public bodies reviewing their approach to openness and transparency to ensure they are keeping pace with public expectations and good practice. Evidence of progress might include:
	<ul> <li>increased public availability of board papers;</li> <li>more insight into why some business is conducted in private; and</li> <li>development of the form and content of annual reports.</li> </ul>

## Other responsibilities

#### **Best Value**

In June 2016 the Accounts Commission formally agreed the overall framework for a new approach to auditing Best Value (BV). This framework introduced a five year approach to auditing BV. 2018/19 represents year three of the BV audit plan. Under this approach, the Controller of Audit will provide a Best Value Assurance Report (BVAR) to the Commission for each Council at least once in a five year period. The national five year BVAR programme is updated each year reflecting changes to risk assessments identified from the SRA process or annual audits. East Ayrshire Council received its BVAR report in 2017/18 with points of note being that the Council has maintained a strong performance since the last report in 2010 but that there is a substantial budget gap which is to be addressed through the Council's new Transformation Strategy.

Our BV audit work in 2018/19 will be integrated into our audit approach, including our work on the audit dimensions discussed on pages 21 to 23, and will be reported in our annual audit report. In particular, we will follow-up on the findings and recommendations made in the Accounts Commission report on East Ayrshire Council which was published in May 2018.

#### Strategic audit priorities

In its Strategy, which is updated annually, the Accounts Commission sets out an overall aim of holding councils to account for their pace, depth and continuity of improvement facilitated by effective governance. Within this, the Commission also sets out five Strategic Audit Priorities that will be built into audit expectations, which are set out below.

- Having clear priorities with a focus on outcomes, supported by effective long-term planning
- Demonstrating the effective appraisal of options for changing how services are delivered in line with their priorities
- Ensuring that members and officers have the right knowledge, skills and support to design, develop and deliver effective services in the future
- Empowering local communities and involving them in the design and delivery of local services and planning for their local area
- Reporting the council's performance in a way that enhances accountability to citizens and communities, helping them contribute better to the delivery of improved outcomes.

We will consider each of these areas as part of our audit dimensions work and report within our annual audit report.

## Other responsibilities (continued)

#### **Shared Risk Assessment and Joint Scrutiny Planning**

The Accounts Commission, supported by Audit Scotland, chairs the Strategic Scrutiny Group (SSG). The SSG is made up of scrutiny bodies from across the public sector to make their work on local government more co-ordinated, better targeted and more proportionate to identified risks.

The arrangements for coordinating scrutiny at a local level include a Local Area Network (LAN) for each Council. LAN's are led by each Council's appointed auditor. LANs bring together relevant scrutiny bodies, typically Audit Scotland, Care Inspectorate, Education Scotland and the Scottish Housing Regulator, to share information and intelligence on an ongoing basis and to carry out a Shared Risk Assessment (SRA). The purpose of the SRA is to inform discussions between the LAN and its Council and to inform the National Scrutiny Plan (NSP) for local government.

A number of changes have been made to the process for 2018/19, the most notable being there is no requirement for LANs to produce local scrutiny plans. LANs can produce local outputs if they determine, in consultation with the Council, that this would be useful. The new approach looks to embed a discussion about risks and responses between scrutiny bodies across the year, rather than a specific one-off approach.

#### **Councils' Statutory Performance Indicators**

The Accounts Commission has a statutory responsibility to define the performance information that Councils must publish to allow citizens to gauge their performance comparatively. This responsibility links with the Commission's BV audit responsibilities. In turn, Councils have their own responsibilities, under their BV duty, to report performance to the public. The 2015 Statutory Performance Information Direction published by the Commission requires Councils to report a range of information in accordance with, but not confined to, the requirements of the LGBF. The Commission has committed to reviewing its 2015 Direction after three years, this will be updating its Direction at the end of 2018.

We will assess the suitability of the arrangements for preparing and publishing the information, closely linked to our work on the Strategic Audit Priority "Reporting the council's performance in a way that enhances accountability to citizens and communities, helping them contribute better to the delivery of improved outcomes" discussed on page 28.

## Other responsibilities (continued)

#### **Performance Audits**

In accordance with Audit Scotland planning guidance, we will be requested to provide information to support performance audits that Audit Scotland intends to publish during 2018/19 and 2019/20, as summarised below:

## Title and planned publication date

Innovative Financing: City Deals
– Autumn 2019

#### **Local auditor input**

Evidence gathered through the routine local audit work in relation to City Deal arrangements as applicable to the audited body. The Ayrshire Growth deal which aims to drive growth across the region, boosting jobs and opportunity across Ayrshire, is progressing, with funding of £100 million for both the UK and Scottish Governments recently announced.

Digital progress in local government – Spring 2020

Education outcomes – Winter 2019

Value for money of non-profit distributing models of capital financing – Summer 2019

Waste management

We will be asked to inform the performance audit team of any significant ICT and digital developments within their audited body.

Scoping work for the audit will take place in early 2019 and will inform any specific input required from auditors. This is likely to be providing an update on governance arrangements and operation of the Regional Improvement Collaboratives.

Scoping work for this audit is underway and it is not anticipated that a formal data return will be required from auditors. The performance audit team will consider national data and liaise with local auditors around potential case studies as appropriate.

Guidance will be provided to auditors, but would typically seek information in relation to local, regional and national waste management arrangements, including cost, investment, volume and Landfill Tax data.

#### **Impact reports**

We will also be requested to provide information to support assessing the impact of previously published performance audit reports as follows:

- Supporting Scotland's economic growth (Winter 2018)
- Equal pay in Scottish Councils (Spring 2019)
- Self-directed support: 2017 progress report (Spring 2019)
- Early learning and child care (Summer 2019)
- Transport Scotland's ferry services (Summer 2019)

#### Other requirements (continued)

#### **Anti-money laundering**

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 came into force on 26 June 2017 and replace the Money Laundering Regulations 2007. The regulations impose an obligation of the Auditor General to inform the National Crime Agency if she knows or suspects that any person has engaged in money laundering or terrorist financing. As part of our audit work, we will ensure we are informed of any instances of money laundering at the Council so that we can advise the Auditor General.

#### **National Fraud Initiative (NFI)**

All Council's are participating in the NFI 2018/19. All data was required to be submitted in October 2018 and Councils will receive matches for investigation in January 2019. Audit Scotland expects bodies to investigate all recommended matches based on findings and the risk of error or fraud. Match investigation work should be largely completed by 30 September 2019 and the results recorded on the NFI system.

We will monitor the Council's participation and progress during 2018/19 and into 2019/20 and, where appropriate, include references to the NFI in our annual audit reports for both years. We will also complete an NFI audit questionnaire and submit to Audit Scotland by 30 June 2019.

## **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 material issues and significant judgements identified, by using our expertise in the local government sector and elsewhere to provide robust challenge to management.
- We have obtained a deep understanding of your business, its environment and of your processes in income and expenditure recognition, payroll expenditure and capital expenditure enabling us to develop a riskfocused approach tailored to the Council.
- Our engagement team is selected to ensure that we have the right subject matter expertise and industry knowledge. We will involve specialists to support the audit team in our work.
- We will utilise the expertise of our internal valuation team to assess the processes in place at the Council in relation to the asset valuation process in place as part of the 5-year rolling valuation programme.

In order to deliver a quality audit to you, each member of the core audit team will receive tailored learning to develop their expertise in audit skills, delivered by Pat Kenny and other sector experts. This includes sector specific matters, and audit methodology updates.



#### **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.

#### 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 Council.

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.

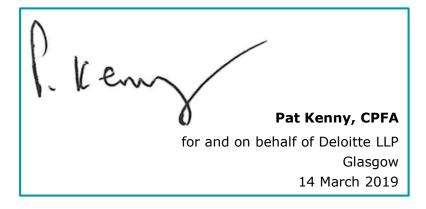
Finally, the views on internal controls and business risk assessment in our final report should not be taken as comprehensive or as an opinion on effectiveness since they will be based solely on the audit procedures performed in the audit of the financial statements and the other procedures performed in fulfilling our audit plan.

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

## Other relevant communications

We will update you if there are any significant changes to the audit plan.

This report has been prepared for the Governance and Scrutiny Committee, 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. Except where required by law or regulation, it should not be made available to any other parties without our prior written consent.





## Prior year audit adjustments

#### Uncorrected and disclosure misstatements

#### **Uncorrected and disclosure misstatements**

There were no uncorrected misstatements above our clearly trivial threshold and no uncorrected material disclosure deficiencies. We identified a small number of immaterial adjustments which management corrected.

#### 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 the recognition of grant income and management override of controls as a key audit risk for your organisation.

#### Fraud characteristics:



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- 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 Council:

- 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 that affects the Council 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

## Inquiries

We will make the following inquiries regarding fraud:



#### Management

- 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.
- Management's process for identifying and responding to the risks of fraud in the entity.
- Management's communication, if any, to those charged with governance regarding its processes for identifying and responding to the risks of fraud in the entity.
- Management's communication, if any, to employees regarding its views on business practices and ethical behaviour.
- Whether management has knowledge of any actual, suspected or alleged fraud affecting the entity.





• Whether internal audit and the Council's local counter fraud specialist has knowledge of any actual, suspected or alleged fraud affecting the entity, and to obtain their views about the risks of fraud.

#### Those charged with governance



- How those charged with governance exercise oversight of management's processes for identifying and responding to the risks of fraud in the entity and the internal control that management has established to mitigate these risks.
- Whether those charged with governance have knowledge of any actual, suspected or alleged fraud affecting the entity.
- The views of those charged with governance on the most significant fraud risk factors affecting the entity.

## Independence and fees

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

Independence confirmation	We confirm the audit engagement team, and others in the firm as appropriate, Deloitte LLP and, where applicable, all Deloitte network firms are independent of the Council and will reconfirm our independence and objectivity to the Governance and Scrutiny Committee for the year ending 31 March 2019 in our final report to the Governance and Scrutiny Committee.	
Fees	The audit fee for 2018/19, in line with the fee range provided by Audit Scotland, is £279,360 as analysed below:	
	£	
	Auditor remuneration 170,830  Audit Scotland fixed charges: Pooled costs 16,570 Performance Audit and Best Value 81,240 Audit support costs 10,720  Total proposed fee 279,360  In addition, the audit fee for the charitable trusts audit is £1,800.  There are no non-audit services fees proposed for the period.	
Non-audit services	In our opinion there are no inconsistencies between the FRC's Ethical Standard and the Council'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.	
Relationships	We have no other relationships with the Council, its directors, senior managers and affiliates, and have not supplied any services to other known connected parties.	

## Our approach to quality



## AQR team report and findings

We maintain a relentless focus on quality and our quality control procedures and continue to invest in and enhance our overall firm Audit Quality Monitoring and Measuring programme.

In June 2018 the Financial Reporting Council ("FRC") issued individual reports on each of the eight largest firms, including Deloitte, on Audit Quality Inspections which provides a summary of the findings of its Audit Quality Review ("AQR") team for the 2017/18 cycle of reviews.

We take the findings of the AQR seriously and we listen carefully to the views of the AQR and other external audit inspectors. We remediate every finding regardless of its significance and seek to take immediate and effective actions, not just on the individual audits selected but across our entire audit portfolio. We are committed to continuously improving all aspects of audit quality in order to provide consistently high quality audits that underpin the stability of our capital markets.

We have improved the speed by which we communicate potential audit findings, arising from the AQR inspections and our own internal reviews to a wider population, however, we need to do more to ensure these actions are embedded. In order to achieve this we have launched a more detailed risk identification process and our InFlight review programme. This programme is aimed at having a greater impact on the quality of the audit before the audit report is signed. Consistent achievement of quality improvements is our aim as we move towards the AQR's 90% benchmark.

All the AQR public reports are available on its website. <a href="https://www.frc.org.uk/auditors/audit-quality-review/audit-firm-specific-reports">https://www.frc.org.uk/auditors/audit-quality-review/audit-firm-specific-reports</a>

#### The AQR's 2017/18 Audit Quality Inspection Report on Deloitte LLP

"The overall results of our reviews of the firm's audits show that 76% were assessed as requiring no more than limited improvements, compared with 78% in 2016/17. Of the FTSE 350 audits we reviewed this year, we assessed 79% as achieving this standard compared with 82% in 2016/17. We are concerned at the lack of improvement in inspection results. The FRC's target is that at least 90% of these audits should meet this standard by 2018/19."

"Where we identified concerns in our inspections, they related principally to aspects of group audit work, audit work on estimates and financial models, and audit work on provisions and contingencies. During the year, the firm has continued to develop the use of "centres of excellence", increasing the involvement of the firm's specialists in key areas of the audit. We have no significant issues to report this year in most of the areas we reported on last year."

"The firm has revised its policies and procedures in response to the revised Ethical and Auditing Standards. We have identified some examples of good practice, as well as certain areas for improvement."

#### The firm has enhanced its policies and procedures in the following areas:

- Increased use of centres of excellence ("CoE") involving the firm's specialists, including new CoEs focusing on goodwill impairment (established in response to previous inspection findings) and corporate reporting, to address increasing complexity of financial reporting.
- Further methodology updates and additional guidance issued to the audit practice including the audit approach to pension balances, internal controls, data analytics, group audits and taxation.
- A new staff performance and development system was implemented with additional focus on regular timely feedback on performance, including audit quality.
- Further improvements to the depth and timeliness of root cause analysis on internal and external inspection findings.

#### Our key findings in the current year requiring action by the firm:

- Improve the group audit team's oversight and challenge of component auditors.
- Improve the extent of challenge of management's forecasts and the testing of the integrity of financial models supporting key valuations and estimates.
- Strengthen the firm's audit of provisions and contingencies.

#### Review of firm-wide procedures. The firm should:

• Enhance certain aspects of its independence systems and procedures.

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