

Walsall Metropolitan Borough District Council

Year ending 31 March 2016

8 February 2016

Ernst & Young LLP



Private and confidential
Members of the Audit Committee
Walsall Metropolitan Borough Council
Civic Centre
Walsall
WS1 1TP

8 February 2016

Dear Committee Members

Audit planning report

We are pleased to attach our audit planning report for the forthcoming meeting of the Audit Committee. The purpose of this report is provide the Audit Committee with a basis to review our proposed audit approach and scope for the 2015/16 audit, in accordance with the requirements the Local Audit and Accountability Act 2014, the National Audit Office Code of Audit Practice (the Code), standing guidance, auditing standards and other professional requirements, but also to ensure that our audit is aligned with the Committee's service expectations.

This report summarises our assessment of the key issues which drive the development of an effective audit for the Council, and outlines our planned audit strategy in response to those risks.

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

We welcome the opportunity to discuss this report with you on 22 February 2016 as well as understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Hassan Rohimum
Executive Director
For and behalf of Ernst & Young LLP

Enclosures

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In April 2015 Public Sector Audit Appointments Ltd (PSAA) issued “Statement of responsibilities of auditors and audited bodies 2015-16”. It is available from the Chief Executive of each audited body and via the [PSAA website](http://www.psaa.co.uk) (www.psaa.co.uk)

The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The ‘Terms of Appointment from 1 April 2015’ issued by PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Audit Plan is prepared in the context of the Statement of Responsibilities. It is addressed to the Audit Committee, and is prepared for the sole use of the audited body. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure – If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Steve Varley, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.

1. Overview

This Audit Plan covers the work that we plan to perform to provide you with:

- ▶ Our audit opinion on whether the financial statements of Walsall Metropolitan Borough Council (the Council) give a true and fair view of the financial position as at 31 March 2016 and of the income and expenditure for the year then ended;
- ▶ A statutory conclusion on the Council's arrangements to secure economy, efficiency and effectiveness (the Value for Money conclusion).

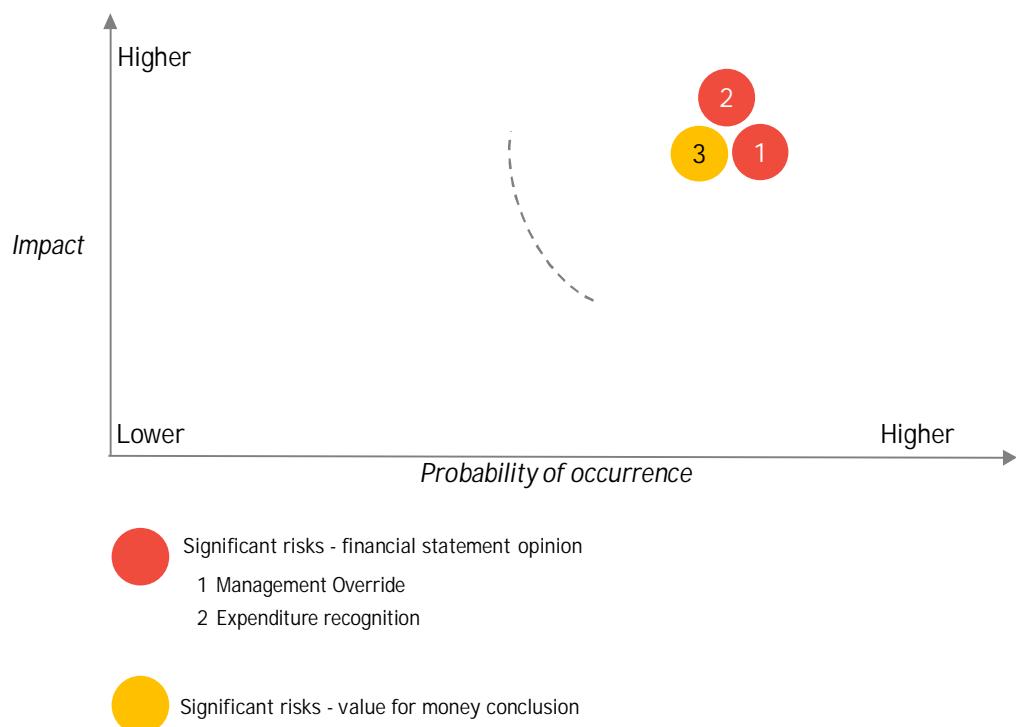
We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on the Council's Whole of Government Accounts return.

When planning the audit we take into account several key inputs:

- ▶ The Council's objectives and strategies and the related business and financial risks relevant to the financial statements.
- ▶ Developments in financial reporting, auditing and corporate governance standards.
- ▶ The quality of systems and processes.
- ▶ Changes in the Council's operating and the wider regulatory environment.
- ▶ Matters that management or the Audit Committee consider significant in relation to the financial statements and that they have requested we pay particular attention to.

By considering these inputs, our audit is focused on the areas that matter and by focusing on the areas that matter, our feedback is more likely to be relevant to the business.

The following 'dashboard' summarises the significant matters that are relevant for planning our year-end audit



In parts two and three of this plan we provide more detail on the above areas and we outline our plans to address them. We will provide an update to the Audit Committee on the results of our work in these areas in our report to those charged with governance scheduled for delivery in September 2016.

2. Financial Statement Risks

We analyse the risks inherent in your external influences, operational activities and financial risks for the Council and our knowledge of other factors that may impact the Council's financial statements.

These outputs are compared with the risks identified through your own risk management process and mapped to the financial statements where applicable. This risk assessment process will help inform the focus our audit work for the year ending 31 March 2016.

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

2.1 Significant risks

Of the financial statement risks identified, we are required by Auditing Standards to consider whether any of the risks identified are 'significant' risks to our Council audit. Auditing standards define significant risks as those with a high likelihood of occurrence and, if they were to occur, could result in a material misstatement of the consolidated financial statements:

There are two presumed risks present in every audit:

- ▶ Management override risk*
- ▶ Risk of fraud in revenue recognition*

* As defined by auditing standards

Significant risks	Our audit approach
Management override risk <p>The risk of fraud exists in any organisation. However, frauds involving the manipulation of results to achieve performance targets would be particularly harmful to the Council's reputation. We have seen recent issues in the sector relating to theft and risk of cybercrime and we will consider these risks as part of our audit work.</p> <p>Management has the primary responsibility to prevent and detect fraud. It is important that management, with the oversight of those charged with governance, has put in place a culture of ethical behaviour and a strong control environment that both deters and prevents fraud.</p>	<p>Based on the requirements of auditing standards our approach will focus on:</p> <ul style="list-style-type: none"> ▶ Identifying fraud risks during the planning stages. ▶ Inquiry of management about risks of fraud and the controls put in place to address those risks. ▶ Understanding the oversight given by those charged with governance of management's processes over fraud. ▶ Consideration of the effectiveness of management's controls designed to address the risk of fraud. ▶ Determining an appropriate strategy to address those identified risks of fraud. ▶ Developing a testing approach to journal entries. ▶ Assessing accounting estimates, particularly provisions, for evidence of management bias. ▶ Develop a testing strategy to test whether the Council has inappropriately capitalised revenue expenditure. ▶ Evaluating the business rationale for significant unusual transactions. ▶ Performing mandatory procedures regardless of specifically identified fraud risks.
Revenue and expenditure recognition <p>Under ISA 240 there is a presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>Having considered the risk factors set out in ISA240 and the nature of the revenue streams at Walsall</p>	<p>Having considered the factors for expenditure recognition, we believe the risk lies within other operating expenditure and in particular the completeness of short term creditors (specifically accruals) and the completeness of 'other service</p>

Significant risks	Our audit approach
<p>Metropolitan Borough Council, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:</p> <ul style="list-style-type: none"> ▶ There is little incentive to manipulate revenue recognition. ▶ Opportunities to manipulate revenue recognition are very limited. <p>Revenue in this context has been modified by Practice Note 10 which states that auditors should also consider the risk that material misstatements due to fraudulent financial reporting may arise for the manipulation of expenditure recognition.</p>	<p>'expenditure' (as defined by the Council in its financial statements).</p> <p>We will:</p> <ul style="list-style-type: none"> ▶ Review and test expenditure recognition policies. ▶ Review and discuss with management any accounting estimates on expenditure recognition for evidence of bias. ▶ Develop a testing strategy to test material revenue and expenditure streams. ▶ Develop a testing strategy to test material creditors at the year end.

2.2 **Respective responsibilities in relation to fraud and error**

We would like to take this opportunity to remind you that management has the primary responsibility to prevent and detect fraud. It is important that management, with the oversight of those charged with governance, has a culture of ethical behaviour and a strong control environment that both deters and prevents fraud.

Our responsibility is to plan and perform audits to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatements whether caused by error or fraud. As auditors, we approach each engagement with a questioning mind that accepts the possibility that a material misstatement due to fraud could occur, and design the appropriate procedures to consider such risk.

Based on the requirements of auditing standards our approach will focus on:

- ▶ Identifying fraud risks during the planning stages;
- ▶ Enquiry of management about risks of fraud and the controls to address those risks;
- ▶ Understanding the oversight given by those charged with governance of management's processes over fraud;
- ▶ Consideration of the effectiveness of management's controls designed to address the risk of fraud;
- ▶ Determining an appropriate strategy to address any identified risks of fraud; and
- ▶ Performing mandatory procedures regardless of specifically identified fraud risks.

We will consider the results of the National Fraud Initiative and may refer to it in our reporting to you.

3. Economy, efficiency and effectiveness

3.1 Introduction

We are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources.

For 2015/16 this is based on the overall evaluation criterion: "In all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people."

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

- ▶ Take informed decisions;
- ▶ Deploy resources in a sustainable manner; and
- ▶ Work with partners and other third parties.

In considering your proper arrangements, we will draw on the requirements of the local authority reporting guidance on governance statements responsibilities published by CIPFA to ensure that our assessment is made against a framework that you are already required to have in place and to report on through documents such as your annual governance statement.

3.2 Risk assessment

We are only required to determine whether there are any risks that we consider significant, which the Code of Audit Practice which defines as:

"A matter is significant if, in the auditor's professional view, it is reasonable to conclude that the matter would be of interest to the audited body or the wider public"

Our risk assessment supports the planning of sufficient work to enable us to deliver a safe conclusion on arrangements to secure value for money and enables us to determine the nature and extent of further work that may be required. If we do not identify any significant risks there is no requirement to carry out further work.

Our risk assessment has therefore considered both the potential financial impact of the issues we have identified, and also the likelihood that the issue will be of interest to local taxpayers, the Government and other stakeholders.

Having completed our risk assessment, we believe a significant risk exists in relation to the Council's medium term financial position.

The Local Government Spending Review set out the expected available revenue for local government spending through to 2019-20: a fall of 6.7% over the review period in real terms. Since 2011/12, the council has reduced its spending by £84.5 million, but has identified that it will need to save a further £84.8 million over the next four years to be able to balance the budget by 2019/20.

The first draft revenue budget proposals 2016/17 to 2019/20 were reported to Cabinet on 28 October 2015. These detailed revenue savings / funding changes of £25.5 million in 2016/17, along with policy papers for savings requiring an executive decision to implement and subsequently referred for public consultation. As the Council progressed to set the 2016/17 annual budget, there have been a number of changes to revenue proposals following extensive budget consultation and equality impact assessments.

Figures released by the Government on 8 February 2016, show that Walsall Metropolitan Borough Council's Core Spending Power will fall by 3.1% in 2016/17:

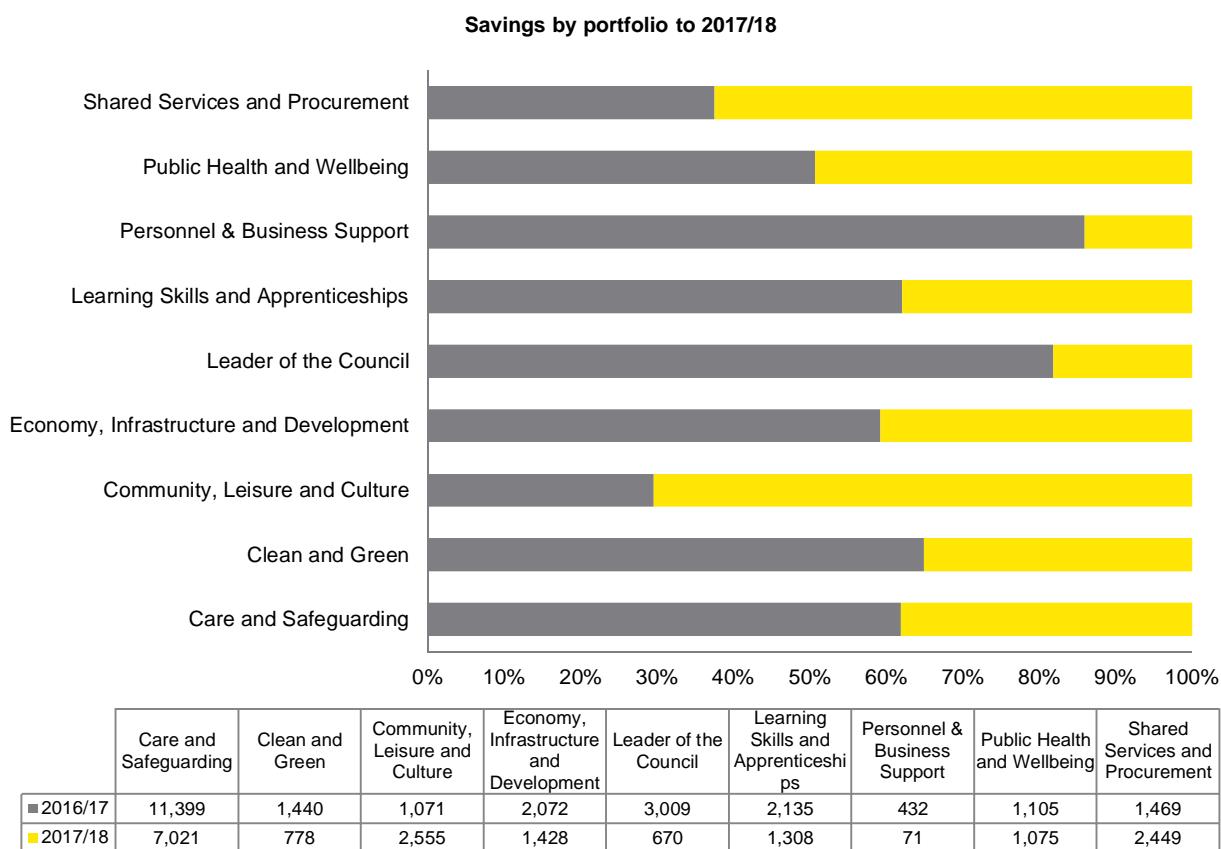
	Core Spending Power £m	Percentage change in Core Spending Power over previous year
2016/17	220.6	-3.1%
2017/18	218.5	-1.0%
2018/19	223.5	2.3%

Core Spending Power is based on:

- ▶ Confirmed finance settlements for 2016/17 to 2018/19.
- ▶ Estimated income from council tax, provided that both the Council Tax Base and annual charge continuing to rise.
- ▶ The Council applies the additional charges to council tax for adult social care.
- ▶ Additional funding through the Improved Better Care Fund.
- ▶ Continued receipt of New Homes Bonus, albeit at much lower levels.
- ▶ The receipt of a transitional grant that provides additional funding to ease the pace of central government funding reductions during the first two years of the settlement.

Source: <https://www.gov.uk/government/publications/key-information-for-local-authorities-final-local-government-finance-settlement-2016-to-2017>

Reduced levels of central government mixed with challenging local socio-economics and demographics means the Council needs to identify a significant amount of efficiency and cost savings between 2016/17 and 2019/20. The Council's Corporate Budget Plan, as presented to the 3 February Cabinet meeting, included proposals for £41.4 million over 2016/17 and 2017/18:



Should all the savings be realised, the Council will still be faced with identifying and securing a further £43.4 million between 2018/19 and 2019/20. The Council recognises

further work will be required to develop the actions, opportunities and policies needed to bridge the gap.

Our approach to this risk will be to:

- ▶ Document the Council's approach to the identification, development and implementation of efficiencies and savings.
- ▶ Assess the Council's overall arrangements, plans and risk strategy.
- ▶ Review key financial reports, including the 2015/16 outturn position to evaluate the Council's record of financial management.
- ▶ Assess the Council's key financial performance indicators.
- ▶ Evaluate the Council's internal risk assessment of savings identified across 2016/17 to 2018/19.

We will remain alert to the possibility of new or emerging significant risks as our audit progresses. In particular, we will keep under review:

- ▶ The work and reports of regulators, such as the Care Quality Commission and OFSTED.
- ▶ The local health economy, including adult social care, and in particular the outcome measures of the Better Care Fund and the extent to which the Council's arrangements are impacted through the challenges faced by Walsall Healthcare NHS Trust.
- ▶ The Council's approach to devolution and the governance applied to the Combined Authority.
- ▶ The outcome of other aspects of assurance work, such as the audited financial position and the Head of Internal Audit's opinion.

4. Our audit process and strategy

4.1 Objective and scope of our audit

Under the National Audit Office's Code of Audit Practice (the 'Code') our principal objectives are to review and report on, the Council's:

- ▶ Financial statements.
- ▶ Arrangements for securing economy, efficiency and effectiveness in its use of resources to the extent required by the relevant legislation and the requirements of the Code.

We issue a two-part audit report covering both of these objectives.

- i Financial statement audit and regularity audit

Our objective is to form an opinion on the financial statements under International Standards on Auditing (UK and Ireland). We also form an opinion on the regularity of expenditure and income.

We will also review and report to the NAO on the Whole of Government Accounts return to the extent and in the form they require.

- ii Arrangements for securing economy, efficiency and effectiveness

We are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources.

4.2 Audit process overview

Processes

A key consideration in our audit planning process is the effectiveness of entity level controls; including the extent to which the Council assesses risk, implements controls in order to minimise risk and performs ongoing testing and monitoring of the effectiveness of the controls implemented.

Analytics

We will aim to use our computer-based data analytics tools to:

- ▶ Focus our testing on specific exceptions and anomalies such as duplicate payments, round sum amounts, items outside of our range of expectations, for example:
 - high volume of payments to individuals or suppliers; and
 - repeated items just below authorisation and approval levels.
- ▶ Perform data integrity checks; for example between static supplier master data and the transactional amounts.
- ▶ Give greater likelihood of identifying errors than random sampling techniques.

In using our data analytics tool we will be able to gain assurance over populations of transactions and assess if appropriate internal controls are in place to avoid fraud/ error.

We will report the findings from our process and analytics work, including any significant weaknesses or inefficiencies identified and make recommendations for improvement, to management and the Audit Committee.

Internal audit

We will review Internal Audit plans and the results of its work. We will reflect the findings from these reports, together with reports from any other work completed in the year, in our detailed audit plan, where we raise issues that could have an impact on the year-end financial statements

Use of experts

When auditing key judgements, we are often required to rely on the input and advice provided by specialists who have qualifications and expertise not possessed by the core audit team. The areas where either EY or third party specialists provide input for the current year audit are:

Area	Specialists
Pensions	EY pensions team
PFI	EY financial modelling and PFI team
IT Controls	EY IT Risk Assessment Specialists
Property, Plant and Equipment	Walsall Metropolitan Borough Council's appointed valuer

In accordance with Auditing Standards, we will evaluate each specialist's professional competence and objectivity, considering their qualifications, experience and available resources, together with the independence of the individuals performing the work.

We also consider the work performed by the specialist in light of our knowledge of the Council's environment and processes and our assessment of audit risk in the particular area. For example, we would typically perform the following procedures:

- ▶ Analyse source data and make inquiries as to the procedures used by the expert to establish whether the source date is relevant and reliable;
- ▶ Assess the reasonableness of the assumptions and methods used;
- ▶ Consider the appropriateness of the timing of when the specialist carried out the work; and
- ▶ Assess whether the substance of the specialist's findings are properly reflected in the financial statements.

Mandatory procedures required by auditing standards

As well as the financial statement risks outlined in section three, we must perform other procedures as required by auditing, ethical and independence standards, the Code and other regulations. We outline below the procedures we will undertake during the course of our audit.

Procedures required by standards

- ▶ Addressing the risk of fraud and error;
- ▶ Significant disclosures included in the financial statements;
- ▶ Entity-wide controls;
- ▶ Reading other information contained in the financial statements and reporting whether it is inconsistent with our understanding and the financial statements; and
- ▶ Auditor independence.

Procedures required by the Code

- ▶ Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Governance Statement and the Remuneration Report.
- ▶ Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO.

Reviewing and examining, where appropriate, evidence relevant to the Council's corporate performance management and financial management arrangements, and its reporting on these arrangements.

4.3 Materiality

For the purposes of determining whether the accounts are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in the aggregate, in light of the surrounding circumstances, could reasonably be expected to influence the economic decisions of the users of the financial statements. Our evaluation of it requires professional judgement and necessarily takes into account qualitative as well as quantitative considerations implicit in the definition. We would be happy to discuss with you your expectations regarding our detection of misstatements in the financial statements.

Materiality determines:

- ▶ The locations at which we conduct audit procedures to support the opinion given on the financial statements; and
- ▶ The level of work performed on individual account balances and financial statement disclosures.

At this early stage of our audit, we have determined that materiality for the 2015/16 financial statements is £12.5 million based on 2% of the Council's estimated gross revenue expenditure for 2015/16. We will communicate uncorrected misstatements greater than £625,000 to you.

The amount we consider material at the end of the audit may differ from our initial determination. At this stage, however, it is not feasible to anticipate all of the circumstances that may ultimately influence our judgement about materiality. At the end of the audit we will form our final opinion by reference to all matters that could be significant to users of the accounts, including the total effect of the audit misstatements we identify, and our evaluation of materiality at that date.

4.4 Fees

The duty to prescribe scales of fees is a statutory function delegated to PSAA by the Secretary of State for Communities and Local Government. In law, audit fees are not a fee for audit services, but a charge to fund operating costs, out of which the costs of audits are met (<http://www.psaa.co.uk/audit-and-certification-fees/201516-work-programme-and-scales-of-fees/>).

PSAA has published a scale fee for all authorities. The indicative scale fee for the audit of Walsall Metropolitan Borough Council is £142,853 and the assumptions underpinning the fee are set out in Appendix A. If any of the assumptions prove to be unfounded, we will seek a variation to the agreed fee and this will be discussed with the Council in advance.

4.5 Your audit team

The engagement team is led by Hassan Rohimum, who has significant experience of local authority audits. Hassan is supported by Mark Surridge, a Senior Manager who will be responsible for the day-to-day direction of our audit and the key point of contact for the Chief Finance Officer and the Director of Resources.

Our audit team also includes a number of specialists to assist us with our procedures, including specialists in pensions, taxation and IT. Where appropriate we will also leverage wider expertise from within the firm. For example: we have a firm wide local authority audit network to share best practice, identify common issues and to develop a consistent audit approach.

4.6 Timetable of communication and deliverables

We have set out below a timetable showing the key stages of the audit, including the VFM work and the Whole of Government Accounts. The timetable includes the deliverables we have agreed to provide to the Council through the Audit Committee's cycle in 2015/16.

From time to time matters may arise that require immediate communication with the Audit Committee and we will discuss them with the Committee Chair as appropriate.

Following the conclusion of our audit we will prepare an Annual Audit Letter to communicate the key issues arising from our work to the Council and external stakeholders, including members of the public

Audit phase	Timetable	Audit committee timetable	Deliverables
High level planning	January 2016	February 2016	
Risk assessment and interim testing of routine processes and controls	February 2016	February 2016	Audit Plan
Year-end audit	July 2016		
Completion of audit	August 2016	September 2016	Report to those charged with governance via the Audit Results Report Audit report (including our opinion on the financial statements; our opinion on the regularity of your expenditure and income; and overall value for money conclusion). Audit completion certificate Reporting to the NAO on the Whole of Government Accounts return.
Conclusion of reporting	October 2016	October 2016	Annual Audit Letter
Benefit claim	May – November		Certified claim
Reporting on certification work	December	December 2016	Annual certification work report

In addition to the above formal reporting and deliverables we will seek to provide practical business insights and updates on regulatory matters.

5. Certification work for housing benefits

Certification work involves executing prescribed tests which are designed to give reasonable assurance that the Council's housing benefits subsidy claim is fairly stated and in accordance with specified terms and conditions. Certification work is not an audit.

The work necessary is determined by the Department of Works and Pensions.

Where possible we integrate our benefits certification work with our opinion and other work. We also aim to rely on the work of internal audit and benefits staff where possible.

We will report to the Accounts, Audit Committee the results of our benefits certification work.

Public Sector Audit Appointments set an indicative fee for benefits certification work for each body. The indicative fee is based on the expectation that audited bodies are able to provide the auditor with complete and materially accurate claims, with supporting working papers, within agreed timeframes.

The indicative fee for Walsall Metropolitan Borough Council is £14,087.

Appendix A Fees

A breakdown of our agreed fee is shown below.

	Planned Fee 2015/16
	£
Opinion Audit and VFM Conclusion	142,853
Total Audit Fee – Code work	142,853
Certification of housing benefits subsidy claim	14,087
Non-audit work	Nil

All fees exclude VAT.

The agreed fee presented above is based on the following assumptions:

- ▶ All working papers are provided in accordance with an agreed timetable.
- ▶ Good quality early drafts of the Council's Annual Governance Statement and Financial Statements are available for us to review.
- ▶ Appropriate quality supporting documentation is provided by the Council.
- ▶ The Council has an effective control environment.
- ▶ Where relevant we are able to place reliance on the work of Internal Audit as planned.
- ▶ Our accounts opinion and value for money conclusion being unqualified.

If any of the above assumptions prove to be unfounded, we will seek a variation to the agreed fee. This will be discussed with the Council in advance.

Appendix B Independence

Introduction

The APB Ethical Standards and ISA (UK and Ireland) 260 'Communication of audit matters with those charged with governance', requires us to communicate with you on a timely basis on all significant facts and matters that bear on our independence and objectivity. The Ethical Standards, as revised in December 2010, require that we do this formally both at the planning stage and at the conclusion of the audit, as well as during the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

Required communications	
Planning stage	Final stage
<ul style="list-style-type: none"> ▶ The principal threats, if any, to objectivity and independence identified by EY including consideration of all relationships between you, your affiliates and directors and us; ▶ The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality Review; ▶ The overall assessment of threats and safeguards; ▶ Information about the general policies and process within EY to maintain objectivity and independence. 	<ul style="list-style-type: none"> ▶ A written disclosure of relationships (including the provision of non-audit services) that bear on our objectivity and independence, the threats to our independence that these create, any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed; ▶ Details of non-audit services provided and the fees charged in relation thereto; ▶ Written confirmation that we are independent; ▶ Details of any inconsistencies between APB Ethical Standards, the PSAA's Terms of Appointment and your policy for the supply of non-audit services by EY and any apparent breach of that policy; and ▶ An opportunity to discuss auditor independence issues.

During the course of the audit we must also communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of our safeguards, for example when accepting an engagement to provide non-audit services.

We also provide information on any contingent fee arrangements, the amounts of any future contracted services, and details of any written proposal to provide non-audit services.

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

Relationships, services and related threats and safeguards

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including any principal threats. However we have adopted the safeguards below to mitigate these threats along with the reasons why they are considered to be effective.

Self-interest threats

A self-interest threat arises when EY has financial or other interests in your entity. Examples include where we have an investment in your entity; where we receive significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with the Council.

At the time of writing, there are no self-interests threats.

We believe that it is appropriate for us to undertake permissible non-audit services, and we will comply with the policies that the Council has approved and that are in compliance with Public Sector Audit Appointment's Terms of Appointment.

At the time of writing, there are no non-audit fees.

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

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

Self-review threats

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

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

Management threats

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

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

Other threats

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

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

Overall Assessment

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

Other required communications

EY has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained.

Details of the key policies and processes within EY for maintaining objectivity and independence can be found in our annual Transparency Report, which the firm is required to publish by law. The most recent version of this report is for the year ended June 2015 and can be found here:

<http://www.ey.com/UK/en/About-us/EY-UK-Transparency-Report-2015>

Appendix C Required communications with those charged with governance

There are certain communications that we must provide to the Audit Committee. These are detailed here:

Required communication	Reference
Planning and audit approach Communication of the planned scope and timing of the audit including any limitations.	► Audit Plan
Significant findings from the audit ► Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures ► Significant difficulties, if any, encountered during the audit ► Significant matters, if any, arising from the audit that were discussed with management ► Written representations that we are seeking ► Expected modifications to the audit report ► Other matters if any, significant to the oversight of the financial reporting process	► Audit Results Report (Report to those charged with governance)
Misstatements ► Uncorrected misstatements and their effect on our audit opinion ► The effect of uncorrected misstatements related to prior periods ► A request that any uncorrected misstatement be corrected ► In writing, corrected misstatements that are significant	► Audit Results Report (Report to those charged with governance)
Fraud ► Enquiries of the Audit Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity ► Any fraud that we have identified or information we have obtained that indicates that a fraud may exist ► A discussion of any other matters related to fraud	► Audit Results Report (Report to those charged with governance)
Related parties Significant matters arising during the audit in connection with the entity's related parties including, when applicable: ► Non-disclosure by management ► Inappropriate authorisation and approval of transactions ► Disagreement over disclosures ► Non-compliance with laws and regulations ► Difficulty in identifying the party that ultimately controls the entity	► Audit Results Report (Report to those charged with governance)
External confirmations ► Management's refusal for us to request confirmations ► Inability to obtain relevant and reliable audit evidence from other procedures	► Audit Results Report (Report to those charged with governance)
Consideration of laws and regulations ► Audit findings regarding non-compliance where the non-compliance is material and believed to be intentional. This communication is subject to compliance with legislation on tipping off ► Enquiry of the Audit Committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the Audit Committee may be aware of	► Audit Results Report (Report to those charged with governance)

Required communication	Reference
Independence Communication of all significant facts and matters that bear on EY's objectivity and independence Communication of key elements of the audit engagement director's consideration of independence and objectivity such as: ▶ The principal threats ▶ Safeguards adopted and their effectiveness ▶ An overall assessment of threats and safeguards ▶ Information about the general policies and process within the firm to maintain objectivity and independence	▶ Audit Plan ▶ Audit Results Report (Report to those charged with governance)
Going concern Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including: ▶ Whether the events or conditions constitute a material uncertainty ▶ Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements ▶ The adequacy of related disclosures in the financial statements	▶ Audit Results Report (Report to those charged with governance)
Significant deficiencies in internal controls identified during the audit	▶ Audit Results Report (Report to those charged with governance)
Fee Information ▶ Breakdown of fee information at the agreement of the initial audit plan ▶ Breakdown of fee information at the completion of the audit	▶ Audit Plan ▶ Audit Results Report (Report to those charged with governance) ▶ Annual Audit Letter if considered necessary
Opening Balances (initial audits) ▶ Findings and issues regarding the opening balance of initial audits	▶ Audit Results Report (Report to those charged with governance)

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