

# West of England Combined Authority audit plan

Year ending 31 March 2023

June 2023



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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Combined Authority or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

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# **Key matters**



#### National context

For the general population, rising inflation rates, in particular for critical commodities such as energy, food and fuel, is pushing many households into poverty and financial hardship, including those in employment. At a national government level, recent political changes have seen an emphasis on controls on spending, which in turn is placing pressure on public services to manage within limited budgets.

Local Government funding continues to be stretched with increasing cost pressures due to the cost of living crisis, including higher energy costs, increasing pay demands, higher agency costs and increases in supplies and services. Local authority front-line services play a vital role in protecting residents from rising costs; preventing the most vulnerable from falling into destitution and helping to build households long-term financial resilience. At a local level, Combined Authorities are also essential in driving strong and inclusive local economies, through their economic development functions and measures like transportation strategy, increasing the supply of affordable housing, integrating skills and employment provision, and prioritising vulnerable households to benefit from energy saving initiatives. Access to these services remains a key priority across the country, but there are also pressures on the quality of services. These could include further unplanned reductions to services and the cancellation or delays to major construction projects such as new roads, amenities and infrastructure upgrades to schools, as well as pothole filling.

Our recent value for money work has highlighted a number of governance and financial stability issues at a national level, which is a further indication of the mounting pressure on audited bodies to keep delivering services, whilst also managing transformation and making savings at the same time. Locally, our work at the Combined Authority in recent years has focussed on governance and partnership working and key recommendations for improvement have been made, which the organisation is responding to, with support from SOLACE and the LGA.

In planning our audit, we will take account of this context in designing a local audit programme which is tailored to your risks and circumstances.

### **Audit Reporting Delays**

In a report published in January 2023 the NAO have highlighted that since 2017-18 there has been a significant decline in the number of local government body accounts including an audit opinion published by the deadlines set by government. The NAO outline a number of reasons for this and proposed actions. In our view, it is critical to early sign off that draft local authority accounts are prepared to a high standard and supported by strong working papers.

## **Key matters**



### Our Responses

- As a firm, we are absolutely committed to audit quality and financial reporting in the local government sector. Our proposed work and fee, as set out further in our Audit Plan, has been agreed with the Deputy s73 Officer.
- We will consider your arrangements for managing and reporting your financial resources as part of our audit in completing our Value for Money work.
- Our value for money work will also consider your arrangements relating to governance and improving economy, efficiency and effectiveness.
- We have considered progress against the prior year recommendations in our Action Plan on page 10.
- We will continue to provide you and your Audit Committee with sector updates providing our insight on issues from a range of sources and other sector commentators via our Audit Committee updates.
- We hold annual financial reporting workshops for our audited bodies to access the latest technical guidance and interpretation, discuss issues with our experts and create networking links with other audited bodies to support consistent and accurate financial reporting across the sector.
- We have identified an increased incentive and opportunity for organisations in the public sector to manipulate their financial statements due to increasing financial pressures. We have identified a significant risk with regard to management override of control- refer to page 7.

### Introduction and headlines

### **Purpose**

This document provides an overview of the planned scope and timing of the statutory audit of West of England Combined Authority ('the Combined Authority') for those charged with governance.

### Respective responsibilities

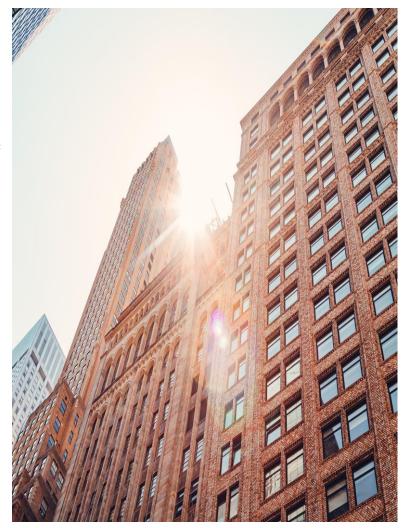
The National Audit Office ('the NAO') has issued a document entitled Code of Audit Practice ('the Code'). This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities are also set out in the Terms of Appointment and Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA), the body responsible for appointing us as auditor of the Combined Authority. We draw your attention to both of these documents.

### Scope of our audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the Combined Authority's financial statements that have been prepared by management with the oversight of those charged with governance (the Audit committee); and we consider whether there are sufficient arrangements in place at the Combined Authority for securing economy, efficiency and effectiveness in your use of resources. Value for money relates to ensuring that resources are used efficiently in order to maximise the outcomes that can be achieved.

The audit of the financial statements does not relieve management or the Audit Committee of your responsibilities. It is the responsibility of the Combined Authority to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Combined Authority is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of the Combined Authority's business and is risk based.



### Introduction and headlines

### Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- Valuation of the net pensions liability
- Management override of controls

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Audit Findings (ISA 260) Report.

### Materiality

We have determined planning materiality to be £2.682m (PY £2.575m) for the Combined Authority, which equates to 2% of your prior year gross operating costs for the year. We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance

Clearly trivial has been set at £0.143m (PY £0.128m).

### Value for Money arrangements

Our risk assessment regarding your arrangements to secure value for money in 2022-23 is yet to be completed as we have recently finalised our Auditor's Annual Report (AAR) for 2021-22 for the Authority's July 2023 Audit Committee.

This report commented on improvements from the previous assessment but, given the nature of the original improvement required, we still considered a number of the previously reported significant weaknesses in arrangements to be extant at this time.

Following publication of the 2021-22 AAR, we will complete our 2022-23 risk assessment and report it to the September Audit Committee.

### **New Auditing Standards**

There are two auditing standards which have been significantly updated this year. These are ISA 315 (Identifying and assessing the risks of material misstatement) and ISA 240 (the auditor's responsibilities relating to fraud in an audit of financial statements). We provide more detail on the work required later in this plan.

### **Audit logistics**

Our interim visit took place in March 2023 and our final visit will take place in July to September 2023. Our key deliverables are this Audit Plan, our Audit Findings Report and Auditor's Annual Report.

Our proposed fee for the audit will be £46,247 (PY: £46,884) for the Combined Authority, subject to the Combined Authority delivering a good set of financial statements and working papers.

We have complied with the Financial Reporting Council's Ethical Standard (revised 2019) and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

# Significant risks identified

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
ISA240 revenue recognition risk	Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to	Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Combined Authority, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:
	the improper recognition of revenue.	there is little incentive to manipulate revenue recognition;
		opportunities to manipulate revenue recognition are very limited; and
		• the culture and ethical frameworks of local authorities, including the Authority, mean that all forms of fraud are seen as unacceptable.
		We therefore do not consider this to be a significant risk for The West of England Combined Authority
Risk of fraud related to	In line with the Public Audit Forum Practice Note 10, in the public sector, auditors must also consider the risk that material misstatements due to fraudulent financial reporting may arise from the manipulation of expenditure recognition (for instance by deferring expenditure to a later period)	We have rebutted this presumed risk for the Combined Authority because:
expenditure recognition		expenditure is well controlled and the Authority has a strong control environment;
PAF Practice Note 10		there is very little incentive for management to mis-represent expenditure; and
		• the Authority has clear and transparent reporting of its financial plans and financial position to those charged with governance.
		We therefore do not consider this to be a significant risk for The West of England Combined Authority. However, our testing will cover the legitimacy of year end creditors and accruals.
Management over-ride of	Under ISA (UK) 240 there is a non-	We will:
controls	rebuttable presumed risk that the risk of management over-ride of controls is present in all entities.	• evaluate the design effectiveness of management controls over journals;
		• analyse the journals listing and determine the criteria for selecting high risk unusual journals;
		<ul> <li>test unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration;</li> </ul>
		<ul> <li>gain an understanding of the accounting estimates and critical judgments applied/made by management and consider their reasonableness with regard to corroborative evidence; and</li> </ul>
		<ul> <li>evaluate the rationale for any changes in accounting policies, estimates, or significant unusual transactions.</li> </ul>

# Significant risks identified

### Risk

### Reason for risk identification

### Key aspects of our proposed response to the risk

Valuation of the pension fund net liability

The Authority's net defined benefit liability, as reflected in its balance sheet, represents a significant estimate in the financial statements.

The pension fund liability is considered a significant estimate due to its size (£13.778m in the Authority's prior year balance sheet) and the sensitivity of the estimate to changes in key assumptions.

We have therefore identified the valuation of the Authority's pension fund liability as a significant risk.

We will:

- update our understanding of the processes and controls put in place by management to ensure that the Authority's net defined benefit liability is not materially misstated and evaluate the design of the associated controls;
- evaluate the instructions issued by management to their management expert (the actuary) for this estimate and the scope and the actuary's work;
- assess the competence, capabilities and objectivity of the actuary who caried out the Authority's pension fund valuation;
- assess the accuracy and completeness of the information provided by the Authority to the actuary to estimate the liability;
- test the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary;
- undertake procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report; and
- obtain assurances from the auditor of Avon Pension Fund as to the controls surrounding the validity and accuracy of membership data, contributions data, and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements.

'Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, due to either size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty.' (ISA (UK) 315)

Management should expect engagement teams to challenge management in areas that are complex, significant or highly judgmental which may be the case for accounting estimates and similar areas. Management should also expect to provide to engagement teams with sufficient evidence to support their judgments and the approach they have adopted for key accounting policies referenced to accounting standards or changes thereto.

Where estimates are used in the preparation of the financial statements management should expect teams to challenge management's assumptions and request evidence to support those assumptions.

### **Other matters**

### Other work

In addition to our responsibilities under the Code of Practice, we have a number of other audit responsibilities, as follows:

- We read your Narrative Report and Annual Governance Statement to check that they are consistent with the financial statements on which we give an opinion and our knowledge of the Combined Authority.
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with requirements set by CIPFA.
- We carry out work on your consolidation schedules for the Whole of Government Accounts process in accordance with NAO group audit instructions.
- We consider our other duties under legislation and the Code, as and when required, including:
  - giving electors the opportunity to raise questions about your 2022/23 financial statements, consider and decide upon any objections received in relation to the 2022/23 financial statements;
  - issuing a report in the public interest or written recommendations to the Combined Authority under section 24 of the Local Audit and Accountability Act 2014 (the Act).
  - application to the court for a declaration that an item of account is contrary to law under section 28 or a judicial review under section 31 of the Act
  - issuing an advisory notice under section 29 of the Act
- We certify completion of our audit.

#### Other material balances and transactions

Under International Standards on Auditing, 'irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure'. All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified in this report.

# Progress against prior year audit recommendations

We identified the following issues in our 2021/22 audit of the Combined Authority's financial statements, which resulted in 3 recommendations being reported in our 2021/22 Audit Findings Report. We will follow up the implementation of these at our final audit visit.

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue
Complete	There were a number of issues identified regarding the accuracy of the Combined Authority's creditors in 2020/21 and 2021/22.	For suppliers, the relevant project manager/ budget holder was consulted for any costs that there were expecting before the end of the financial year but had not been invoiced. They got confirmation from third parties on the amounts of the accruals via email. For grant payments, internal record where checked for the approved grants for the financial year. Each of the third parties was then contacted, in March, directly by the finance team asking for confirmation on total spend to date and the spend anticipated to the end of the year. For both supplier accruals and grant payments written confirmation was obtained from an external source before accruals were added to the system.
Complete	The Combined Authority strengthened its internal controls during the year and journals are now required to be approved within the ledger. Previously there was an inefficient manual process in place.  However, the Authority was unable to provide a report listing the journals processed in the year, the poster and approver and the	This is now in place.
	Financial Accountant needed to produce this manually.	
Complete		This has now been removed from staff members and streamlined. A new control has also been put in place where we check who is a system administrator each month.

## Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

### Matter Description

#### l Determination

We have determined financial statement materiality based on a proportion of the gross expenditure of the Combined Authority for the financial year. Materiality at the planning stage of our audit is £2.862m, which equates to 2% of your draft gross expenditure for the period.

### Planned audit procedures

We determine planning materiality in order to:

- establish what level of misstatement could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements
- assist in establishing the scope of our audit engagement and audit tests
- determine sample sizes and
- assist in evaluating the effect of known and likely misstatements in the financial statements

### 2 Reassessment of materiality

Our assessment of materiality is kept under review throughout the audit process.

We reconsider planning materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality.

### Other communications relating to materiality we will report to the Audit Committee

Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. Under ISA 260 (UK) 'Communication with those charged with governance', we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. ISA 260 (UK) defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.

We report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work.

In the context of the Combined Authority, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £0.143m (PY £0.128m). If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Audit Committee to assist it in fulfilling its governance responsibilities.

# IT audit strategy

In accordance with ISA (UK) 315 Revised, we are required to obtain an understanding of the relevant IT and technical infrastructure and details of the processes that operate within the IT environment. We are also required to consider the information captured to identify any audit relevant risks and design appropriate audit procedures in response. As part of this we obtain an understanding of the controls operating over relevant Information Technology (IT) systems i.e., IT general controls (ITGCs). Our audit will include completing an assessment of the design and implementation of relevant ITGCs. We say more about ISA 315 Revised on slide 21.

The following IT systems have been judged to be in scope for our audit and based on the planned financial statement audit approach we will perform the indicated level of assessment:

IT system	Audit area	Spend/Income	Planned level IT audit assessment
Unit 4 Agresso	Financial reporting	£146.229m	Detailed ITGC assessment (design effectiveness only)
iTrent	Payroll	£12.25m	Detailed ITGC assessment (design effectiveness only)

# Value for Money arrangements

### Approach to Value for Money work for the period ended 31 March 2023

The National Audit Office-issued its latest Value for Money guidance-to auditors in January 2023. The Code expects auditors to consider whether a body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are expected to report any significant weaknesses in the body's arrangements, should they come to their attention. In undertaking their work, auditors are expected to have regard to three specified reporting criteria. These are as set out below:



### Improving economy, efficiency and effectiveness

How the body uses information about its costs and performance to improve the way it manages and delivers its services.



### Financial Sustainability

How the body plans and manages its resources to ensure it can continue to deliver its services.



#### Governance

How the body ensures that it makes informed decisions and properly manages its risks.

Our risk assessment regarding your arrangements to secure value for money in 2022-23 is yet to be completed as we have recently finalised our Auditor's Annual Report (AAR) for 2021-22 for the Authority's July Audit Committee.

This report commented on improvements from the previous assessment but, given the nature of the original improvement required, we still considered a number of the previously reported significant weaknesses in arrangements to be extant at this time. Following publication of the 2021-22 AAR, we will complete our 2022-23 risk assessment and report it to the September Audit Committee.

## **Audit logistics and team**





Key audit contact responsible for the day-to-day management and delivery of the audit work



Liam Royle, Audit Manager Plans and manages the delivery of the audit including regular contact with senior officers.



Jon Roberts, Key Audit Partner

Provides oversight of the delivery of the audit including regular engagement with Governance Committees and senior officers

### **Audited Entity responsibilities**

Where audited bodies do not deliver to the timetable agreed, we need to ensure that this does not impact on audit quality or absorb a disproportionate amount of time, thereby disadvantaging other audited bodies. Where the elapsed time to complete an audit exceeds that agreed due to an entity not meeting its obligations we will not be able to maintain a team on site. Similarly, where additional resources are needed to complete the audit due to an entity not meeting their obligations we are not able to guarantee the delivery of the audit to the agreed timescales. In addition, delayed audits will incur additional audit fees.

### Our requirements

To minimise the risk of a delayed audit, you need to:

- ensure that you produce draft financial statements of good quality by the deadline you have agreed with us, including all notes, the Annual Report and the Annual Governance Statement
- ensure that good quality working papers are available at the start of the audit, in accordance with the working paper requirements schedule that we have shared with you
- ensure that the agreed data reports are available to us at the start of the audit and are reconciled to the values in the accounts, in order to facilitate our selection of samples for testing
- ensure that all appropriate staff are available on site throughout (or as otherwise agreed) the planned period of the audit
- respond promptly and adequately to audit gueries.

# Audit fees and updated Auditing Standards including ISA 315 Revised

In 2017, PSAA awarded a contract of audit for The West of England Combined Authority to begin with effect from 2018/19. The fee agreed in the contract was £18,634. Since that time, there have been a number of developments, particularly in relation to significant increases in the size and complexity of the Authority and the revised Code and ISA's which are relevant for the 2022/23 audit. For details of the changes which impacted on years up to 2021/22 please see our prior year Audit Plans.

The major change impacting on our audit for 2022/23 is the introduction of ISA (UK) 315 (Revised) - Identifying and assessing the risks of material misstatement ('ISA 315'). There are a number of significant changes that will impact the nature and extent of our risk assessment procedures and the work we perform to respond to these identified risks. Key changes include:

- Enhanced requirements around understanding the Combined Authority's IT Infrastructure, IT environment. From this we will then identify any risks arising from the use of IT. We are then required to identify the IT General Controls ('ITGCs') that address those risks and test the design and implementation of ITGCs that address the risks arising from the use of IT.
- Additional documentation of our understanding of the Combined Authority's business model, which may result in us needing to perform additional
  inquiries to understand the Combined Authority's end-to-end processes over more classes of transactions, balances and disclosures.
- We are required to identify controls within a business process and identify which of those controls are controls relevant to the audit. These include, but are not limited to, controls over significant risks and journal entries. We will need to identify the risks arising from the use of IT and the general IT controls (ITGCs) as part of obtaining an understanding of relevant controls.
- Where we do not test the operating effectiveness of controls, the assessment of risk will be the inherent risk, this means that our sample sizes may be larger than in previous years.

These are significant changes which will require us to increase the scope, nature and extent of our audit documentation, particularly in respect of your business processes, and your IT controls. We will be unable to determine the full fee impact until we have undertaken further work in respect of the above areas. However, for an authority of your size, we estimate an initial increase of £1,000. We will let you know if our work in respect of business processes and IT controls identifies any issues requiring further audit testing. There is likely to be an ongoing requirement for a fee increase in future years, although we are unable yet to quantify that.

The other major change to Auditing Standards in 2022/23 is in respect of ISA 240 which deals with the auditor's responsibilities relating to fraud in an audit of financial statements. This Standard gives more prominence to the risk of fraud in the audit planning process. We will let you know during the course of the audit should we be required to undertake any additional work in this area which will impact on your fee.

• Taking into account the above, our proposed work and fee for 2022/23, as set out below, is detailed overleaf and has been agreed with the Deputy s73 Officer.

### **Audit fees**

	Actual Fee 2020/21	Actual (or estimated) Fee 2021/22	Proposed fee 2022/23
West of England Combined Authority Audit	£105,884	£46,884	£46,247

### **Assumptions**

In setting the above fees, we have assumed that the Combined Authority will:

- prepare a good quality set of accounts, supported by comprehensive and well-presented working papers which are ready at the start of the audit
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.

### Relevant professional standards

In preparing our fee estimate, we have had regard to all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's <u>Ethical Standard (revised 2019)</u> which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

# Audit fees - detailed analysis

New Scale Fee published by PSAA for 2022-23	£23,947
Increase in the size and complexity of the Combined Authority 2022 and subsequently (still under consideration by PSAA)	£7,500
Additional work on Value for Money (VfM) under new NAO Code	£5,000
Increased audit requirements of revised ISA 540	£1,200
Increased audit requirements of revised ISA 240 journals testing	£2,100
Increased audit requirements of revised ISA 315	£1,000
Payroll change of circumstances testing	£500
Local risk factors*	£5,000
Total audit fees 2022-23 (excluding VAT)	£46,247
*in respect of governance and related follow up matters	

## Independence and non-audit services

#### **Auditor independence**

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons. relating to our independence. We encourage you to contact us to discuss these or any other independence issues with us. We will also discuss with you if we make additional significant judgements surrounding independence matters.

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Combined Authority's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements. Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

We confirm that we have implemented policies and procedures to meet the requirements of the Ethical Standard. For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Combined Authority.

#### Other services

No other services provided by Grant Thornton were identified.

# Communication of audit matters with those charged with governance

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks and Key Audit Matters	•	
Confirmation of independence and objectivity of the firm, the engagement team members and all other indirectly covered persons	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant matters in relation to going concern	•	•
Significant findings from the audit		•
Significant matters and issue arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud(deliberate manipulation) involving management and/or which results in material misstatement of the financial statements (not typically Combined Authority tax fraud)		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•
Expected modifications to the auditor's report, or emphasis of matter		•

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Plan,

outlines our audit strategy and plan
to deliver the audit, while the Audit
Findings will be issued prior to
approval of the financial statements
and will present key issues, findings
and other matters arising from the
audit, together with an explanation
as to how these have been resolved.

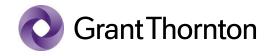
We will communicate any adverse or

unexpected findings affecting the
audit on a timely basis, either
informally or via an audit progress
memorandum.

#### Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.



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