

Audit and Risk Committee

03 March 2020 Agenda item number 9

External audit

Report by Chief Financial Officer

Summary

This report appends:

- i. The Annual Audit Letter for 2018/19;
- ii. The Audit Plan for the 2019/20 audit; and
- iii. The Local Government Audit Committee Briefing by Ernst and Young.

Recommendation

- i. That the Annual Audit Letter for 2018/19 be noted.
- ii. That the Audit Plan for 2019/20 audit be noted.
- iii. That the briefing, including the key questions for Audit Committees as set out on page 13, be noted.

1. Introduction

- 1.1. The Annual Audit letter for 2018/19 summarises the key issues arising from the audit. These key findings are set out on page 9 of Appendix 1. The Audit results were considered at 19 November 2019 Audit and Risk committee. The final audit fee remained the same as detailed in the audit plan and was charged to the accounts for the year.
- 1.2. The Audit Plan for the 2019/20 audit by Ernst and Young is appended to this report (appendix 2). The plan sets out the work which the auditors propose to undertake for the audit of the financial statements and the value for money conclusion for 2019/20.
- 1.3. The Audit Manager, Vicky Chong, has been replaced by Jacob McHugh. The Audit Manager will be attending the meeting to introduce the Audit Plan and answer any questions.
- 1.4. In order to meet the July deadline, it is proposed to consider the audit results as part of the Broads Authority meeting on 24 July where they will also be approved.

2. Identification of Significant Risks

- 2.1. The Audit Plan takes a risk-based approach to audit planning and identifies significant risks in 2019/20, these relate to misstatements due to fraud or error. This includes the incorrect capitalisation of revenue expenditure. These risks are consistent to the risks presented for 2018/19.
- 2.2. Other risks identified are the valuation of land and buildings and the pension liability valuation. These are also consistent with last year's audit.
- 2.3. There is one new area of audit focus for 2019/20 which relates to the implementation of new accounting standard IFRS 16 Leases and Going Concern Compliance ISA 570. The audit will assess the Authority's implementation of these in the Statement of Accounts.
- 2.4. The audit approach to these risks, audit focus and value for money is set out in section two and three of the Audit Plan.

3. Financial Implications

3.1. Page 35 of Appendix 2 provides an overview of the scale fee chargeable (£10,736) which is consistent with the fee charged for 2018/19. This is what has been included in the 2019/20 budget. Members' attention is drawn to the factors which may result in additional work, therefore cost.

4. Briefing Key Issues

- 4.1. This briefing is presented to Members as a "for information" item.
- 4.2. The items of relevance to the Authority are:
 - Public Works Loan Board (PWLB) Interest Rate Increase (page 6);
 - Going Concern (page 8);
 - Public Sector Audit Consultations (page 9);
 - CIPFA Financial Management Code (page 9);
 - Green Revolution (page 10); and
 - EY audit quality and transparency reports (pages 10 to 12).

Author: Emma Krelle

Date of report: 12 February 2020

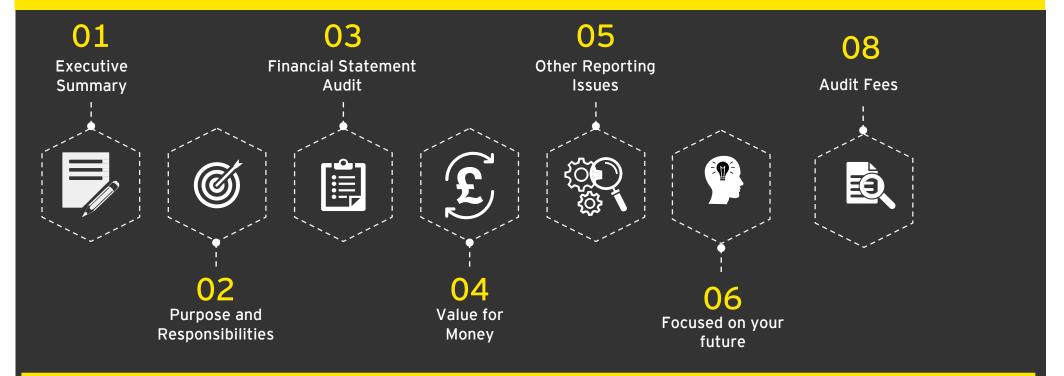
Appendix 1 – 2018-19 Broads Authority – Annual Audit Letter – 18 December 2019

Appendix 2 - External Audit Plan 2019-20

Appendix 3 – External Audit Committee Briefing Q4 2019



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This 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 (updated April 2018)' 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 Results Report is prepared in the context of the Statement of responsibilities. It is addressed to the Members of the audited body, and is prepared for their sole use. 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.



Executive Summary

We are required to issue an Annual Audit Letter to Broads Authority (the Authority) following completion of our audit procedures for the year ended 31 March 2019. Below are the results and conclusions on the significant areas of the audit process.

Area of Work	Conclusion
Opinion on the Authority's: ▶ Financial statements	Unqualified – the financial statements give a true and fair view of the financial position of the Authority as at 31 March 2019 and of its expenditure and income for the year then ended.
► Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts.
Concluding on the Authority's arrangements for securing economy, efficiency and effectiveness	We concluded that you have put in place proper arrangements to secure value for money in your use of resources.

Area of Work	Conclusion		
Reports by exception:			
► Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the Authority.		
► Public interest report	We had no matters to report in the public interest.		
Written recommendations to the Authority, which should be copied to the Secretary of State	We had no matters to report.		
► Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report.		

Area of Work	Conclusion
Reporting to the National Audit Office (NAO) on our review of the Authority's Whole of Government Accounts return (WGA).	The Authority is below the specified audit threshold of £500 million. Therefore, we did not perform any audit procedures on the consolidation pack.



Executive Summary (cont'd)

As a result of the above we have also:

Area of Work	Conclusion
Issued a report to those charged with governance of the Authority communicating significant findings resulting from our audit.	Our Audit Results Report was issued on 7 November 2019.
Issued a certificate that we have completed the audit in accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	Our certificate was issued on 25 November 2019.

We would like to take this opportunity to thank the Authority's staff for their assistance during the course of our work.

MARK HOBGSON

Mark Hodgson

Associate Partner

For and on behalf of Ernst & Young LLP



The Purpose of this Letter

The purpose of this Annual Audit Letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the Authority.

We have already reported the detailed findings from our audit work in our 2018/19 Audit Results Report to the 19 November Audit & Risk Committee, representing those charged with governance. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the Authority.

Responsibilities of the Appointed Auditor

Our 2018/19 audit work has been undertaken in accordance with the Audit Plan that we issued on 5 March 2019 and is conducted in accordance with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK and Ireland), and other guidance issued by the National Audit Office.

As auditors we are responsible for:

- ► Expressing an opinion:
 - ▶ On the 2018/19 financial statements; and
 - ▶ On the consistency of other information published with the financial statements.
- ► Forming a conclusion on the arrangements the Authority has to secure economy, efficiency and effectiveness in its use of resources.
- ► Reporting by exception:
 - ▶ If the annual governance statement is misleading or not consistent with our understanding of the Authority;
 - ▶ Any significant matters that are in the public interest;
 - ▶ Any written recommendations to the Authority, which should be copied to the Secretary of State; and
 - ▶ If we have discharged our duties and responsibilities as established by the Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the National Audit Office (NAO) on you Whole of Government Accounts return. The Authority is below the specified audit threshold of £500 million. Therefore, we did not perform any audit procedures on the return.

Responsibilities of the Authority

The Authority is responsible for preparing and publishing its statement of accounts accompanied by an Annual Governance Statement (AGS). In the AGS, the Authority reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The Authority is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.





Financial Statement Audit

The Authority's Statement of Accounts is an important tool for the Authority to show how it has used public money and how it can demonstrate its financial management and financial health.

We audited the Authority's Statement of Accounts in line with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK and Ireland), and other guidance issued by the National Audit Office and issued an unqualified audit report on 25 November 2019.

Our detailed findings were reported to the 19 November 2019 Audit & Risk Committee.

Risk of management override of control

What was the risk?

The financial statements as a whole are not free of material misstatements whether caused by fraud or error.

As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.

Linking to our risk of fraud we have considered the capitalisation of revenue expenditure on Property, Plant and Equipment (see next page).

What did we do and What judgements are we focused on?

We performed mandatory procedures, including:

- ► Tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements;
- Reviewed accounting estimates for evidence of management bias; and;
- Evaluated the business rationale for significant unusual transactions.

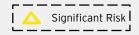
ISA 240 mandates we perform procedures on: accounting estimates, significant unusual transactions and journal entries to ensure they are appropriate and in line with expectations of the business.

What are our conclusions?

We have not identified any material weaknesses in controls or evidence of material management override.

We have not identified any instances of inappropriate judgements being applied.

We did not identify any other transactions during our audit which appeared unusual or outside the Authority's normal course of business.





Significant risk

Misstatement due to fraud or error - the incorrect capitalisation of revenue spend

What was the risk?

Linking to our risk of misstatements due to fraud and error above, we have identified the incorrect capitalisation of revenue spend as a separate risk which could result in a misstatement of cost of services reported in the Comprehensive Income and Expenditure Statement. As the Authority is more focused on its financial position over medium term, we have considered the risk of management override to be more prevalent in the inappropriate capitalisation of revenue expenditure on Property, Plant and Equipment (PPE) given the extent of the Authority's capital programme.



What did we do and What judgements are we focused on?

We have performed the following procedures:

- Reviewed the appropriateness of revenue and expenditure recognition accounting policies and tested that they have been applied correctly during our detailed testing;
- Performed sample testing on additions to PPE to ensure that they have been correctly classified as capital and included at the correct value to identify any revenue items that have been inappropriately capitalised;
- Tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements.

What are our conclusions?

We have not identified any instances of inappropriate capitalisation of revenue expenditure on Property, Plant and Equipment.



Other Areas of Audit Focus

Valuation of land and buildings - inherent risk

What was the risk?

The fair value of property, plant and equipment (PPE) represent significant balances in the Authority's accounts and are subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.

What did we do and What judgements are we focused on?

We have performed the following procedures:

- Considered the work performed by the Authority's valuers (Concertus), including the adequacy of the scope of the work performed, their professional capabilities and the results of their work;
- Undertook the sample testing key asset information used by the valuers in performing their valuation (e.g. floor plans to support valuations based on price per square metre);
- Considered the annual cycle of valuations to ensure that assets have been valued within a 5 year rolling programme as required by the Code for PPE. We also considered if there are any specific changes to assets that have occurred and that these have been communicated to the valuer;
- Reviewed assets not subject to valuation in 2018/19 and confirmed that the remaining asset base is not materially misstated;
- Considered changes to useful economic lives as a result of the most recent valuation; and
- Tested accounting entries have been correctly processed in the financial statements.

What are our conclusions?

Following full consideration of their work, we have placed reliance on the Authority's valuation expert. We have not identified any instances of inappropriate judgements being applied.

We did not identify any significant issues in the assumptions used by the Authority in estimating the value of property, plant and equipment.



Other Areas of Audit Focus

Pension Liability Valuation inherent risk

What was the risk?

The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Norfolk County Council.

The Authority's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Authority's balance sheet. At 31 March 2019 this totalled £10.480 million.

The information disclosed is based on the IAS 19 report issued to the Authority by the actuary to the County Council. Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

What did we do and What judgements are we focused on?

We have performed the following procedures:

- Liaised with the auditors of Norfolk Pension Fund, and obtain assurances over the information supplied to the actuary in relation to the Broads Authority;
- Assessed the work of the Pension Fund actuary (Hymans Robertson) including the assumptions they have used by relying on the work of PWC Consulting Actuaries
- commissioned by National Audit Office for all Local Government sector auditors, and considered any relevant reviews by the EY actuarial team;
- Reviewed and tested the accounting entries and disclosures made within the Authority's financial statements in relation to IAS19.

What are our conclusions?

We have reviewed the assessment of the pension fund actuary by PWC and EY pensions and have undertaken the work required.

The reporting from the Pension Fund auditors highlighted that the market value of the pension fund assets at 31 March 2019 was overstated by £20.5 million as a result of the Fund using incorrect spot rates for conversion of the Private Equity Investment. Management has obtained a revised IAS19 report from the actuary and has amended the accounts for the updated asset figures, increasing the post employment benefit charged to the Comprehensive Income and Expenditure Statement by £134,000.

The reporting from the Pension Fund auditors highlighted that the market value of the pension fund assets at 31 March 2019 was £3,825.2 million. When compared to the actuaries estimate of the fund assets at 31 March 2019 of £3,834.8 million this creates a difference of £9.6 million. The Authority's share of the assets equates to approximately 0.7% of the fund. The Authority's share of the difference is therefore approximately £67,000 which management chose not to adjust for.

A national issue resulted in a relatively late change to the pension fund accounts and IAS 19 fund liability disclosure. It relates to legal rulings regarding age discrimination arising from public sector pension scheme transitional arrangements, commonly described as the McCloud ruling. Revised actuarial reports provided by the actuaries show an increase in the liability of £198,000 to the Authority's Pension Liabilities as a result of the adjustments, with further associated disclosure added to recognise this as a source of estimation uncertainty and an adjusted Post Balance sheet event.



Other Areas of Audit Focus

New Accounting Standards - IFRS 9

What was the risk?

IFRS 9 financial instruments

This new accounting standard is applicable for local authority accounts from the 2018/19 financial year and will change how financial assets are classified and measured, how the impairment of financial assets are calculated; and the disclosure requirements for financial assets.

There are transitional arrangements within the standard; and the 2018/19 CIPFA Code of practice on local authority accounting provides guidance on the application of IFRS 9. However, until the Guidance Notes are issued and any statutory overrides are confirmed there remains some uncertainty on the accounting treatment.

What did we do and What judgements are we focused on?

We have performed the following procedures:

- Assessed the Authority's implementation arrangements that included an impact assessment paper setting out the application of the new standard, transitional adjustments and planned accounting for 2018/19;
- Considered the classification and valuation of financial instrument assets:
- Reviewed the new expected credit loss model impairment calculations for assets; and
- Checked additional disclosure requirements.

What are our conclusions?

We identified a disclosure error in relation to Financial Instruments in Note 35 where Financial Assets have been understated by £1.434 million due to 'Cash and Cash Equivalents' of £1.198 million and Short-Term Debtors of £0.236 million being incorrectly excluded from the balance. The error, and the prior year comparative were corrected by Management.



Areas of Audit Focus

Other Areas of Audit Focus

New Accounting Standards - IFRS 15

What is the risk?

IFRS 15 Revenue from contracts with customers

This new accounting standard is applicable for local authority accounts from the 2018/19 financial year.

The key requirements of the standard cover the identification of performance obligations under customer contracts and the linking of income to the meeting of those performance obligations.

The 2018/19 CIPFA Code of practice on local authority accounting provides guidance on the application of IFRS 15 and includes a useful flow diagram and commentary on the main sources of LG revenue and how they should be recognised.

The impact on local authority accounting is likely to be limited as large revenue streams like government grants and toll income will be outside the scope of IFRS 15. However where that standard is relevant, the recognition of revenue will change and new disclosure requirements introduced.

What did we do and What judgements are we focused on?

We have performed the following procedures:

- Assessed the Authority's implementation arrangements that included an impact assessment paper setting out the application of the new standard, transitional adjustments and planned accounting for 2018/19;
- Considered the application to the Authority's revenue streams, and where the standard is relevant test to ensure revenue is recognised when (or as) it satisfies a performance obligation; and
- Checked additional disclosure requirements.

What are our conclusions?

From the work undertaken we have not identified any issues with the implementation of the new standard.

Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	We determined planning materiality to be £171,900 (2018: £128,900), which is 2% of gross expenditure on provision of services reported in the accounts of £8.595 million adjusted for interest costs.
	We consider gross expenditure on provision of services to be one of the principal considerations for stakeholders in assessing the financial performance of the Authority.
Reporting threshold	We agreed with the Audit & Risk Committee that we would report to the Committee all audit differences in excess of £8,500 (2018: £7,800)

We also identified the following areas where misstatement at a level lower than our overall materiality level might influence the reader. For these areas we developed an audit strategy specific to these areas. The areas identified and audit strategy applied include:

- ► Remuneration disclosures including any severance payments, exit packages and termination benefits: reduced materiality level of £5,000 applied in line with bandings disclosed.
- ▶ Related party transactions and members allowances: reduced materiality level applied equal to the reporting threshold.

We evaluate any uncorrected misstatements against both the quantitative measures of materiality discussed above and in light of other relevant qualitative considerations.



£ Value for Money

We are required to consider whether the Authority has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. This is known as our value for money conclusion.

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.



We did not identify any significant risks in relation to these criteria.

We did not identify any significant weaknesses in the Authority's arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.

We therefore issued an unqualified value for money conclusion on 25 November 2019.





Whole of Government Accounts

The Authority is below the specified audit threshold of £500 million. Therefore, we did not perform any audit procedures on the consolidation pack.

Annual Governance Statement

We are required to consider the completeness of disclosures in the Authority's Annual Governance statement, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading.

We completed this work and did not identify any areas of concern.

Report in the Public Interest

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the Authority or brought to the attention of the public.

We did not identify any issues which required us to issue a report in the public interest.

Written Recommendations

We have a duty under the Local Audit and Accountability Act 2014 to designate any audit recommendation as one that requires the Authority to consider it at a public meeting and to decide what action to take in response.

We did not identify any issues which required us to issue a written recommendation.

Objections Received

We did not receive any objections to the 2018/19 financial statements from members of the public.

Other Powers and Duties

We identified no issues during our audit that required us to use our additional powers under the Local Audit and Accountability Act 2014.



Other Reporting Issues (cont'd)

ndependence

We communicated our assessment of independence in our Audit Results Report to Audit & Risk Committee on 19 November 2019. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.

Control Themes and Observations

As part of our work, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. Although our audit was not designed to express an opinion on the effectiveness of internal control, we are required to communicate to you significant deficiencies in internal control identified during our audit.

We have adopted a fully substantive approach and have therefore not tested the operation of controls.

We did not identify any significant deficiencies in internal control during our audit.





Focused on your future

The Code of Practice on Local Authority Accounting in the United Kingdom introduces the application of new accounting standards in future years. The impact on the Council is summarised in the table below.

Standard	Issue	Impact	
IFRS 16 Leases	It is currently proposed that IFRS 16 will be applicable for local authority accounts from the 2020/21 financial year.	Until the 2020/21 Accounting Code is issued and any statutory overrides are confirmed there remains some uncertainty in this area. However what is clear is that the Authority will need to undertake a detailed exercise to identify all of its leases and capture the relevan information for them. The Authority must therefore ensure that all	
	Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet.		
	There are transitional arrangements within the standard and although the 2020/21 Accounting Code of Practice for Local Authorities has yet to be issued, CIPFA have issued some limited provisional information which begins to clarify what the impact on local authority accounting will be. Whether any accounting statutory overrides will be introduced to mitigate any impact remains an outstanding issue.	lease arrangements are fully documented.	
IASB Conceptual Framework	The revised IASB Conceptual Framework for Financial Reporting (Conceptual Framework) will be applicable for local authority accounts from the 2019/20	It is not anticipated that this change to the Code will have a material impact on Local Authority financial statements.	
	financial year.	However, Authorities will need to undertake a review to determine whether current classifications and accounting remains valid under	
	This introduces;		
	 new definitions of assets, liabilities, income and expenses updates for the inclusion of the recognition process and criteria and new provisions on derecognition enhanced guidance on accounting measurement bases enhanced objectives for financial reporting and the qualitative aspects of financial information. 	the revised definitions.	
	The conceptual frameworks is not in itself an accounting standard and as such it cannot be used to override or disapply the requirements of any applicable accounting standards.		
	However, an understanding of concepts and principles can be helpful to preparers of local authority financial statements when considering the treatment of transactions or events where standards do not provide specific guidance, or where a choice of accounting policies is available.		



Audit Fees

Our final fee for 2018/19 is as expected, at the scale fee set by the PSAA and as we reported in our 19 November 2019 Annual Results Report.

	Final Fee 2018/19	Planned Fee 2018/19	Scale Fee 2018/19	Final Fee 2017/18
Description	£'s	£'s	£'s	£'s
Total Audit Fee - Code work	10,736	10,736	10,736	13,943

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About EY

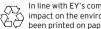
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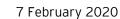


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The Members
Audit & Risk Committee
Broads Authority
Yare House
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Norwich NR1 1RY

Dear Committee Members

2019/20 Audit Plan

We are pleased to attach our Audit Plan which sets out how we intend to carry out our responsibilities as auditor. Its purpose is to provide the Audit & Risk Committee with a basis to review our proposed audit approach and scope for the 2019/20 audit in accordance with the requirements of the Local Audit and Accountability Act 2014, the National Audit Office's 2015 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements. It is also to ensure that our audit is aligned with the Committee's service expectations.

This Provisional Audit Plan summarises our initial assessment of the key risks driving the development of an effective audit for the Authority and outlines our planned audit strategy in response to those risks. Our planning procedures remain ongoing; we will inform the Audit & Risk Committee if there any significant changes or revisions once we have completed these procedures and will provide an update to the next meeting of the committee.

This report is intended solely for the information and use of the Audit & Risk Committee 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 3 March 2020 as well as understand whether there are other matters which you consider may influence our audit.

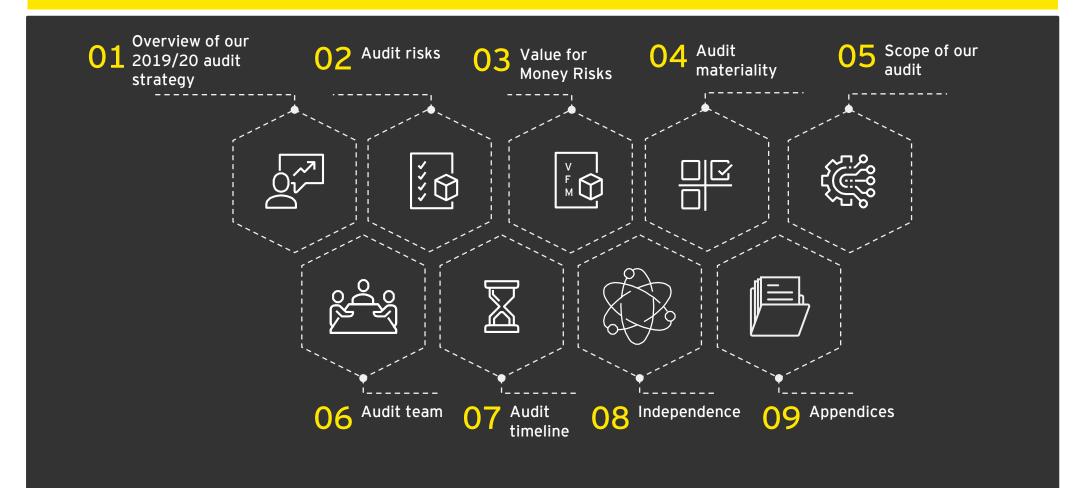
Yours faithfully

MARK HODGSON

Associate Partner For and on behalf of Ernst & Young LLP

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The "Terms of Appointment and further guidance (updated April 2018)" issued by the 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 in legislation, and covers matters of practice and procedure which are of a recurring nature.

This report is made solely to the Audit & Risk Committee Committee and management of the Broads Authority in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit & Risk Committee Committee, and management of the Broads Authority those matters we are required to state to them in this report and for no other purpose. To the fullest extent permitted by law we do not accept or assume responsibility to anyone other than the Audit & Risk Committee, and management of the Broads Authority for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.





The following 'dashboard' summarises the significant accounting and auditing matters outlined in this report. It seeks to provide the Finance, Resources, Audit and Governance Committee with an overview of our initial risk identification for the upcoming audit and any changes in risks identified in the current year.

Audit risks and areas of focus

Risk / area of focus	Risk identified	Change from PY	Details
Misstatements due to fraud or error	Fraud risk	No change in risk or focus	As identified in ISA 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that would otherwise appear to be operating effectively.
Incorrect capitalisation of revenue expenditure	Fraud risk	No change in risk or focus, but shown separately for clarity	Linking to the risk above we have considered the capitalisation of revenue expenditure on Property, Plant and Equipment (PPE) as a specific fraud risk, as this is one area where the management override risk could manifest itself, given the extent of the Authority's capital programme.
Valuation of Land and Buildings	Inherent risk	No change in risk or focus	The fair value of Property, Plant and Equipment (PPE) represent significant balances in the Authority's accounts and are estimates which are subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet. We note that Management have changed their external valuers for 2019/20 and will address this risk in our procedures.
Pension Liability Valuation	Inherent risk	No change in risk or focus	The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Norfolk County Authority. The Authority's pension fund liability (£10.812 million as at 31 March 2019) is a material estimate and the Code requires that the liability be disclosed on the Authority's balance sheet.



The following 'dashboard' summarises the significant accounting and auditing matters outlined in this report. It seeks to provide the Audit Committee with an overview of our initial risk identification for the upcoming audit and any changes in risks identified in the current year.

In addition to the risks outlined above we have identified an area of audit focus.

Area of focus	Change from PY	Details
		IFRS 16 Leases: Implementation of IFRS 16 will be included in the Code of Practice on Local Authority Accounting in the United Kingdom (the Code) for 2020/21. This Code has yet to published, but in July 2019 CIPFA/LASAAC issued 'IFRS 16 leases and early guide for practitioners'. It is likely there will be some disclosure requirements for the 2019/20 statement of accounts.
Implementation of new auditing and accounting standards	New area of focus	Going Concern Compliance with ISA 570: This auditing standard has been revised in response to enforcement cases and well-publicised corporate failures where the auditor's report failed to highlight concerns about the prospects of entities which collapsed shortly after. The revised standard is effective for audits of financial statements for periods commencing on or after 15 December 2019, which for the Authority will be the audit of the 2020/21 financial statements.



Materiality

Planning materiality

£176,000

Materiality for the single entity has been set at £0.176 million, which represents 2% of the prior years gross expenditure on provision of services.

Performance materiality

£132,000

Performance materiality has been set at £0.132 million, which represents 75% of materiality. We have assessed a lower likelihood of misstatement this year based on the prior year audit.

Audit differences

£8,792

We will report all uncorrected misstatements relating to the primary statements (comprehensive income and expenditure statement, balance sheet, movement in reserves statement, cash flow statement) greater than £8,792. Other misstatements identified will be communicated to the extent that they merit the attention of the Audit & Risk Committee Committee.

Audit scope

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

- Our audit opinion on whether the financial statements of the Broads Authority give a true and fair view of the financial position as at 31 March 2020 and of the income and expenditure for the year then ended; and
- Our conclusion on the Authority's arrangements to secure economy, efficiency and effectiveness (Value for Money).

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

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

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

- Strategic, operational and financial risks relevant to the financial statements;
- Developments in financial reporting and auditing standards;
- The quality of systems and processes;
- Changes in the business and regulatory environment; and,
- Management's views on all of the above.

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

Taking the above into account, and as articulated in this audit plan, our professional responsibilities require us to independently assess the risks associated with providing an audit opinion and undertake appropriate procedures in response to that. Our Terms of Appointment with PSAA allow them to vary the fee dependent on "the auditors assessment of risk and the work needed to meet their professional responsibilities". PSAA are aware that the setting of scale fees has not kept pace with the changing requirements of external audit with increased focus on, for example, the valuations of land and buildings, the auditing of groups, the valuation of pension obligations, the introduction of new accounting standards such as IFRS 9 and 15 in recent years as well as the expansion of factors impacting the value for money conclusion. Therefore to the extent any of these or any other risks are relevant in the context of the Broads Authority's audit, we will discuss these with management as to the impact on the scale fee.



Our response to significant risks

Misstatements due to fraud or error *

What is the risk?

The financial statements as a whole are not free of material misstatements whether caused by fraud or error.

As identified in ISA (UK) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.

We identify and respond to this fraud risk on every audit engagement.

Linking to our risk of fraud we have considered the capitalisation of revenue expenditure on Property, Plant and Equipment as a specific area where management override could manifest itself (see below).

What will we do?

In order to address this risk we will carry out a range of procedures including:

- 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.
- Performing mandatory procedures regardless of specifically identified fraud risks, including testing of journal entries and other adjustments in the preparation of the financial statements.

We have set out the significant risks (including fraud risks denoted by*) identified for the current year audit along with the rationale and expected audit approach. The risks identified below may change to reflect any significant findings or subsequent issues we identify during the audit.

Our response to significant risks (continued)

Misstatements due to fraud or error - the incorrect capitalisation of revenue expenditure *

Financial statement impact

We have identified a risk of expenditure misstatements due to fraud or error that could affect the income and expenditure accounts.

We consider the risk applies to capitalisation of revenue expenditure and could result in a misstatement of cost of services reported in the Comprehensive Income and Expenditure statement.

What is the risk?

As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively (see above).

As the Authority is more focused on its financial position over medium term, we have considered the risk of management override to be more prevalent in the inappropriate capitalisation of revenue expenditure on Property, Plant and Equipment (PPE) given the material extent of the Authority's capital programme.

What will we do?

In order to address this risk we will carry out a range of procedures including:

- Reviewing the appropriateness of revenue and expenditure recognition accounting policies and testing that they have been applied correctly during our detailed testing;
- Performing sample testing on additions to PPE to ensure that they have been correctly classified as capital and included at the correct value to identify any revenue items that have been inappropriately capitalised;
- Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements.

We have set out the significant risks (including fraud risks denoted by*) identified for the current year audit along with the rationale and expected audit approach. The risks identified below may change to reflect any significant findings or subsequent issues we identify during the audit.

Other areas of audit focus

We have identified other areas of the audit, that have not been classified as significant risks, but are still important when considering the risks of material misstatement to the financial statements and disclosures and therefore may be key audit matters we will include in our audit report.

What is the risk/area of focus?

Valuation of Land and Buildings

The fair value of Property, Plant and Equipment (PPE) represent significant balances in the Authority's accounts and are subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.

The Authority will engage an external expert valuer who will apply a number of complex assumptions to these assets. Annually assets are assessed to identify whether there is any indication of impairment. We note that the Authority has employed a new valuation firm for 2019/20.

As the Authority's asset base is significant, and the outputs from the valuer are subject to estimation, there is a risk fixed assets may be under/overstated.

ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of experts and assumptions underlying fair value estimates.

What will we do?

In order to address this risk we will carry out a range of procedures including:

- Consider the work performed by the Authority's valuer, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work:
- ► Sample testing key asset information used by the valuer in performing their valuation (e.g. floor plans to support valuations based on price per square metre);
- Consider the annual cycle of valuations to ensure that assets have been valued within a 5 year rolling programme as required by the Code for PPE. We have also considered if there are any specific changes to assets that have occurred and that these have been communicated to the valuer;
- Review assets not subject to valuation in 2019/20 to confirm that the remaining asset base is not materially misstated;
- Consider circumstances that require the use of EY valuation specialists to review any material specialist assets and the underlying assumptions used;
- Consider changes to useful economic lives as a result of the most recent valuation; and
- ► Test accounting entries have been correctly processed in the financial statements.

Other areas of audit focus

We have identified other areas of the audit, that have not been classified as significant risks, but are still important when considering the risks of material misstatement to the financial statements and disclosures and therefore may be key audit matters we will include in our audit report.

What is the risk/area of focus?

Pension Liability Valuation

The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Norfolk County Council.

The Authority's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Authority's balance sheet. At 31 March 2019 this totalled £10.812 million.

The information disclosed is based on the IAS 19 report issued to the Authority by the actuary to the County Council.

Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf.

ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

What will we do?

In order to address this risk we will carry out a range of procedures including:

- Liaise with the auditors of Norfolk Pension Fund, to obtain assurances over the information supplied to the actuary in relation to the Broads Authority;
- Assess the work of the Pension Fund actuary (Hymans) including the assumptions they have used by relying on the work of PwC Consulting Actuaries commissioned by Public Sector Auditor Appointments for all Local Government sector auditors, and considering any relevant reviews by the EY actuarial team; and
- Review and test the accounting entries and disclosures made within the Authority's financial statements in relation to IAS19.

Other areas of audit focus (continued)

What is the risk/area of focus?

What will we do?

IFRS16 - leases

IFRS 16 Leases was issued by the IASB in 2016. Its main impact is to remove (for lessees) the traditional distinction between finance leases and operating leases. Finance leases have effectively been accounted for as acquisitions (with the asset on the balance sheet, together with a liability to pay for the asset acquired). In contrast, operating leases have been treated as "pay as you go" arrangements, with rentals expensed in the year they are paid. IFRS 16 requires all substantial leases to be accounted for using the acquisition approach, recognising the rights acquired to use an asset.

Implementation of IFRS 16 will be included in the Code of Practice on Local Authority Accounting in the United Kingdom (the Code) for 2020/21. This Code has yet to published, but in July 2019 CIPFA/LASAAC issued 'IFRS 16 leases and early guide for practitioners'.

This early guidance provides comprehensive coverage of the requirements of the forthcoming provisions, including:

- "the identification of leases
- "the recognition of right-of-use assets and liabilities and their subsequent measurement
- "treatment of gains and losses
- "derecognition and presentation and disclosure in the financial statements,
- "the management of leases within the Prudential Framework.

The guidance also covers the transitional arrangements for moving to these new requirements, such as:

- "the recognition of right-of-use assets and liabilities for leases previously accounted for as operating leases by lessees
- ▶ "the mechanics of making the transition in the 2020/21 financial statements (including the application of transitional provisions and the preparation of relevant disclosure notes).

IFRS 16 - leases introduces a number of significant changes which go beyond accounting technicalities. For example, the changes have the potential to impact on procurement processes as more information becomes available on the real cost of leases.

The key accounting impact is that assets and liabilities in relation to significant lease arrangements previously accounted for as operating leases will need to be recognised on the balance sheet.

Although the new standard will not be included in the CIPFA Code of Practice until 2020/21, work will be necessary to secure information required to enable authorities to fully assess their leasing position and ensure compliance with the standard from 1 April 2020 and some narrative disclosures are likely to be required for 2019/20.

In particular, full compliance with the revised standard for 2020/21 is likely to require a detailed review of existing lease and other contract documentation prior to 1 April 2020 in order to identify:

- all leases which need to be accounted for
- the costs and lease term which apply to the lease
- the value of the asset and liability to be recognised as at 1 April 2020 where a lease has previously been accounted for as an operating lease.

We will discuss progress made in preparing for the implementation of IFRS 16 - leases with the finance team over the course of our 2019/20 audit.

Other areas of audit focus (continued)

What is the risk/area of focus?

Going Concern Compliance with ISA 570

This auditing standard has been revised in response to enforcement cases and well-publicised corporate failures where the auditor's report failed to highlight concerns about the prospects of entities which collapsed shortly after.

The revised standard is effective for audits of financial statements for periods commencing on or after 15 December 2019, which for the Authority will be the audit of the 2020/21 financial statements. The revised standard increases the work we are required to perform when assessing whether the Authority is a going concern. It means UK auditors will follow significantly stronger requirements than those required by current international standards; and we have therefore judged it appropriate to bring this to the attention of the Audit Committee.

The CIPFA Guidance Notes for Practitioners 2019/20 accounts states 'The concept of a going concern assumes that an authority's functions and services will continue in operational existence for the foreseeable future. The provisions in the Code in respect of going concern reporting requirements reflect the economic and statutory environment in which local authorities operate. These provisions confirm that, as authorities cannot be created or dissolved without statutory prescription, they must prepare their financial statements on a going concern basis of accounting.'

'If an authority were in financial difficulty, the prospects are thus that alternative arrangements might be made by central government either for the continuation of the services it provides or for assistance with the recovery of a deficit over more than one financial year. As a result of this, it would not therefore be appropriate for local authority financial statements to be provided on anything other than a going concern basis.'

What will we do?

The revised standard requires:

- auditor's challenge of management's identification of events or conditions impacting going concern, more specific requirements to test management's resulting assessment of going concern, an evaluation of the supporting evidence obtained which includes consideration of the risk of management bias;
- greater work for us to challenge management's assessment of going concern, thoroughly test the adequacy of the supporting evidence we obtained and evaluate the risk of management bias. Our challenge will be made based on our knowledge of the Authority obtained through our audit, which will include additional specific risk assessment considerations which go beyond the current requirements;
- ▶ improved transparency with a new reporting requirement for public interest entities, listed and large private companies to provide a clear, positive conclusion on whether management's assessment is appropriate, and to set out the work we have done in this respect. While the Authority are not one of the three entity types listed, we will ensure compliance with any updated reporting requirements;
- ► a stand back requirement to consider all of the evidence obtained, whether corroborative or contradictory, when we draw our conclusions on going concern; and
- necessary consideration regarding the appropriateness of financial statement disclosures around going concern.

The revised standard extends requirements to report to regulators where we have concerns about going concern.

We will discuss the detailed implications of the new standard with finance staff during 2019/20 ahead of its application for 2020/21.





∀alue for Money

Background

We are required to consider whether the Authority has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. This is known as our value for money conclusion.

For 2019/20 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 CIPFA/SOLACE framework for local government 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.

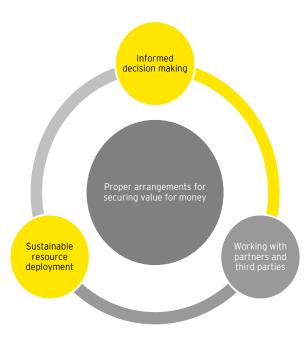
We are only required to determine whether there are any risks that we consider significant, which the Code of Audit Practice defines as:

"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. We consider business and operational risks insofar as they relate to proper arrangements at both sector and organisation-specific level.

We have not yet fully completed our value for money planning risk assessment for 2019/20. We will consider the steps taken by the Authority to consider the impact of Brexit on its future service provision, medium-term financing and investment values. Although the precise impact cannot yet be modelled, we would expect that Authorities will be carrying out scenario planning and that Brexit and its impact will feature on operational risk registers. Our risk assessment will consider both the potential financial impact of the issues we identify, and also the likelihood that the issue will be of interest to local taxpavers. the Government and other stakeholders.

We are aware that the Authority is also awaiting notification of its grant allocation for 2020/21. We will assess the impact of this on the Authority's Medium Term Financial Plan and what impact this has on sustainable resource deployment.





₽ Audit materiality

Materiality

Materiality

For planning purposes, materiality for 2019/20 has been set at £176,000. This represents 2% of the Authority's prior year gross expenditure on net cost of services plus financing and investment expenditure. It will be reassessed throughout the audit process. We have provided supplemental information about audit materiality in Appendix C.



We request that the Audit & Risk Committee confirm its understanding of, and agreement to, these materiality and reporting levels.

Key definitions

Planning materiality - the amount over which we anticipate misstatements would influence the economic decisions of a user of the financial statements.

Performance materiality – the amount we use to determine the extent of our audit procedures. We have set performance materiality at £132,000 which represents 75% of planning materiality. We have considered a number of factors such as the number of errors in the prior year and any significant changes when determining the percentage of performance materiality.

Audit difference threshold - we propose that misstatements identified below this threshold are deemed clearly trivial. We will report to you all uncorrected misstatements over this amount relating to the comprehensive income and expenditure statement and balance sheet that have an effect on income or that relate to other comprehensive income.

Other uncorrected misstatements, such as reclassifications and misstatements in the cashflow statement and movement in reserves statement or disclosures, and corrected misstatements will be communicated to the extent that they merit the attention of the Audit & Risk Committee, or are important from a qualitative perspective.

Specific materiality - We have set a lower materiality for Senior Officer's Remuneration, Members' Allowances and Exit Packages disclosures which reflects our understanding that an amount less than our materiality would influence the economic decisions of users of the financial statements in relation to this.



Our Audit Process and Strategy

Objective and Scope of our Audit scoping

Under the Code of Audit Practice our principal objectives are to review and report on the Authority's financial statements and 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 an audit report that covers:

1. Financial statement audit

Our objective is to form an opinion on the financial statements under International Standards on Auditing (UK and Ireland).

We also 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 Annual Governance; and
- Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO

2. Arrangements for securing economy, efficiency and effectiveness (value for money)

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

Our Audit Process and Strategy (continued)

Audit Process Overview

Our audit involves:

- ► Identifying and understanding the key processes and internal controls; and
- Substantive tests of detail of transactions and amounts.

Our intention is to carry out a fully substantive audit in 2019/20 as we believe this to be the most efficient audit approach. Although we are therefore not intending to rely on individual system controls in 2019/20, the overarching control arrangements form part of our assessment of your overall control environment and will form part of the evidence for your Annual Governance Statement.

Analytics:

We will use our computer-based analytics tools to enable us to capture whole populations of your financial data, in particular journal entries. These tools:

- ▶ Help identify specific exceptions and anomalies which can then be subject to more traditional substantive audit tests; and
- Give greater likelihood of identifying errors than random sampling techniques.

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

Internal audit:

As in prior years we will review internal audit plans and the results of the works. 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 they raise issues that could have an impact on the financial statements.



Our Audit Process and Strategy (continued)

Earlier deadline for production of the financial statements

The Accounts and Audit Regulations 2015 introduced a significant change in statutory deadlines from the 2017/18 financial year. From that year the timetable for the preparation and approval of accounts will be brought forward with draft accounts needing to be prepared by 31 May and the publication of the accounts by 31 July.

These changes provide risks for both the preparers and the auditors of the financial statements:

- The Authority now has less time to prepare the financial statements and supporting working papers. Risks to the Authority include slippage in delivering data for analytics work in format and to time required, late working papers, internal guality assurance arrangements, changes to finance team etc.
- As your auditor, we have a more significant peak in our audit work and a shorter period to complete the audit. Risks for auditors relate to delivery of all audits within same compressed timetable. Slippage at one client could potentially put delivery of others at risk.

To mitigate this risk we will require:

- good quality draft financial statements and supporting working papers by the agreed deadline;
- appropriate Authority staff to be available throughout the agreed audit period; and
- complete and prompt responses to audit questions using the EY Canvas Portal.

If you are unable to meet key dates within our agreed timetable, we will notify you of the impact on the timing of your audit, which may be that we postpone your audit until later in the year and redeploy the team to other work to meet deadlines elsewhere.

Where additional work is required to complete your audit, due to additional risks being identified, additional work being required as a result of scope changes, or poor audit evidence, we will notify you of the impact on the fee and the timing of the audit. Such circumstances may result in a delay to your audit while we complete other work elsewhere.

To support the Authority we will:

- Work with the Authority and officers to engage early to facilitate early substantive testing where appropriate.
- Provide an early review on the Authority's streamlining of the Statement of Accounts where non-material disclosure notes are removed.
- Facilitate a closedown workshop with Statutory Finance Officers to agree an approach to enable us all to achieve a successful closure of accounts for the 2019/20 financial year.
- Work with the Authority to implement/ embed/ improve the use of EY Client Portal, this will:
 - ► Streamline our audit requests through a reduction of emails and improved means of communication;
 - ▶ Provide on -demand visibility into the status of audit requests and the overall audit status;
 - ► Reduce risk of duplicate requests; and
 - ► Provide better security of sensitive data.
- Agree the team and timing of each element of our work with you.
- Agree the supporting working papers that we require to complete our audit.





Overview of our 2019/20 audit strategy

Audit team changes

Key changes to our team.

Mark Hodgson Lead Audit Partner Jacob McHugh Audit Manager Charles Camano Lead Senior

Working together with the Authority

We are working together with officers to identify continuing improvements in communication and processes for the 2019/20 audit.

We will continue to keep our audit approach under review to streamline it where possible.

Audit team

Mark Hodgson, Associate Partner

- Mark has significant public sector audit experience, with a portfolio of Local Authorities and Local Government Pension Funds and is a member of the Chartered Institute of Public Finance and Accountancy (CIPFA).
- Mark is supported by Jacob McHugh, Audit Manager, who is responsible for the day-to-day direction of audit work and is the key point of contact for the finance team.



Use of specialists

Our approach to the involvement of specialists, and the use of their work.

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
Valuation of Land and Buildings	The Broads Authority's property valuers (NPS). We will also consider any valuation aspects that may require EY valuation specialists to review any material specialist assets and the underlying assumptions used.
Pensions disclosure	EY Actuaries, PwC (Consulting Actuary to PSAA) and Hymans Robertson (the Authority's actuary)
Fair Value Investment Measurement	The Authority's Treasury Advisor if relevant.

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 Authority's business and processes and our assessment of audit risk in the particular area. For example, we would typically perform the following procedures:

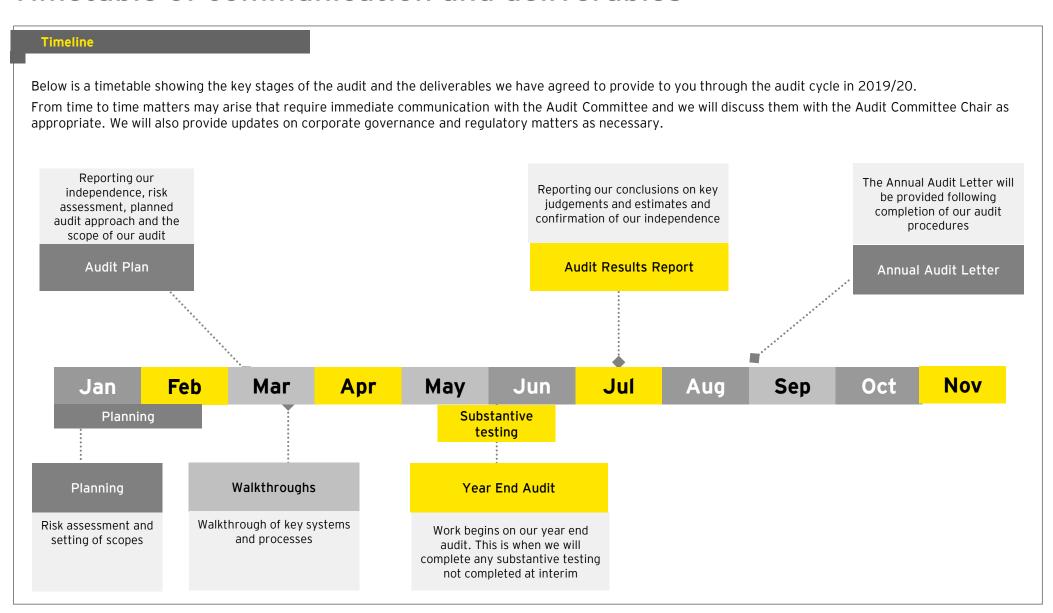
- Analyse source data and make inquiries as to the procedures used by the specialist to establish whether the source data is relevant and reliable;
- Assess the reasonableness of the assumptions and methods used;
- ► Consider the appropriateness of the timing of when the specialist carried out the work;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





Audit timeline

Timetable of communication and deliverables







Introduction

The FRC Ethical Standard and ISA (UK) 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 upon our integrity, objectivity and independence. The Ethical Standard, as revised in June 2016, requires that we communicate formally both at the planning stage and at the conclusion of the audit, as well as during the course of 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

- ► The principal threats, if any, to objectivity and independence identified by Ernst & Young (EY) including consideration of all relationships between the 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.
- Where EY has determined it is appropriate to apply more restrictive independence rules than permitted under the Ethical Standard.

Final stage

- ▶ In order for you to assess the integrity, objectivity and independence of the firm and each covered person, we are required to provide a written disclosure of relationships (including the provision of non-audit services) that may bear on our integrity, objectivity and independence. This is required to have regard to relationships with the entity, its directors and senior management, its affiliates, and its connected parties and the threats to integrity or objectivity, including those that could compromise independence that these create. We are also required to disclose 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 the firm and each covered person is independent and, if applicable, that any non-EY firms used in the group audit or external experts used have confirmed their independence to us;
- ▶ Written confirmation that all covered persons are independent;
- Details of any inconsistencies between FRC Ethical Standard and your policy for the supply of non-audit services by EY and any apparent breach of that policy;
- ▶ Details of any contingent fee arrangements for non-audit services provided by us or our network firms; and
- ► An opportunity to discuss auditor independence issues.

In addition, during the course of the audit, we are required to communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place, 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 services that have been contracted, and details of any written proposal to provide non-audit services that has been submitted;

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, analysed in appropriate categories, are disclosed.



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 the principal threats, if any. We have adopted the safeguards noted below to mitigate these threats along with the reasons why they are considered to be effective. However we will only perform non -audit services if the service has been pre-approved in accordance with your policy.

Overall Assessment

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

Self interest threats

A self interest threat arises when EY has financial or other interests in the Authority. Examples include 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 you. At the time of writing, there are no long outstanding fees.

We believe that it is appropriate for us to undertake permissible non-audit services and we will comply with the policies that you have approved.

None of the services are prohibited under the FRC's ES or the National Audit Office's Auditor Guidance Note 01 and the services have been approved in accordance with your policy on pre-approval. The ratio of non audit fees to audits fees is not permitted to exceed 70%.

At the time of writing, the current ratio of non-audit fees to audit fees is approximately 0%.

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 you. We confirm that no member of our audit engagement team, including those from other service lines, has objectives or is rewarded in relation to sales to you, in compliance with Ethical Standard part 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 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 the Authority. Management threats may also arise during the provision of a non-audit service in relation to which management is required to make judgements or decision 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.

Independence

New UK Independence Standards

The Financial Reporting Authority (FRC) published the Revised Ethical Standard 2019 in December and it will apply to accounting periods starting on or after 15 March 2020. A key change in the new Ethical Standard will be a general prohibition on the provision of non-audit services by the auditor (and its network) which will apply to UK Public Interest Entities (PIEs). A narrow list of permitted services will continue to be allowed.

Summary of key changes

- Extraterritorial application of the FRC Ethical Standard to UK PIE and its worldwide affiliates
- A general prohibition on the provision of non-audit services by the auditor (or its network) to a UK PIE, its UK parent and worldwide subsidiaries
- A narrow list of permitted services where closely related to the audit and/or required by law or regulation
- Absolute prohibition on the following relationships applicable to UK PIE and its affiliates including material significant investees/investors:
 - Tax advocacy services
 - Remuneration advisory services
 - Internal audit services
 - Secondment/loan staff arrangements
- An absolute prohibition on contingent fees.
- Requirement to meet the higher standard for business relationships i.e. business relationships between the audit firm and the audit client will only be permitted if it is inconsequential.
- Permitted services required by law or regulation will not be subject to the 70% fee cap.
- Grandfathering will apply for otherwise prohibited non-audit services that are open at 15 March 2020 such that the engagement may continue until completed in accordance with the original engagement terms.
- A requirement for the auditor to notify the Audit Committee where the audit fee might compromise perceived independence and the appropriate safeguards.
- A requirement to report to the audit committee details of any breaches of the Ethical Standard and any actions taken by the firm to address any threats to independence. A requirement for non-network component firm whose work is used in the group audit engagement to comply with the same independence standard as the group auditor. Our current understanding is that the requirement to follow UK independence rules is limited to the component firm issuing the audit report and not to its network. This is subject to clarification with the FRC.

Next Steps

We do not provide any non-audit services which would be prohibited under the new standard.



Other communications

EY Transparency Report 2019

Ernst & Young (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 in place 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 end 30 June 2019:

https://www.ey.com/Publication/vwLUAssets/ey-uk-2019-transparency-report/\$FILE/ey-uk-2019-transparency-report.pdf





Appendix A

Fees

The duty to prescribe fees is a statutory function delegated to Public Sector Audit Appointments Ltd (PSAA) by the Secretary of State for Housing, Communities and Local Government.

This is defined as the fee required by auditors to meet statutory responsibilities under the Local Audit and Accountability Act 2014 in accordance with the requirements of the Code of Audit Practice and supporting guidance published by the National Audit Office, the financial reporting requirements set out in the Code of Practice on Local Authority Accounting published by CIPFA/LASAAC, and the professional standards applicable to auditors' work.

	Scale fee 2019/20	Final Fee 2018/19
	£	£
Total Fee - Code work	10,736	10,736
Total audit	10,736	10,736
Total other non-audit services	0	0
Total fees	10,736	10,736

All fees exclude VAT

For 2019/20, the scale fee will be impacted by a range of factors (see page 8) which will result in additional work. We will continue to discuss the impact of these factors with management and the impact on the final fee.

The base scale fee presented is based on the following assumptions:

- Officers meeting the agreed timetable of deliverables;
- > Our accounts opinion and value for money conclusion being unqualified;
- > Appropriate quality of documentation is provided by the Authority; and
- > The Authority has an effective control environment.

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 Authority in advance.

Fees for the auditor's consideration of correspondence from the public and formal objections will be charged in addition to the scale fee.



Required communications with the Audit Committee

Our Reporting to you Required communications What is reported? When and where Terms of engagement Confirmation by the Audit & Risk Committee Committee of acceptance of terms of The statement of responsibilities serves as the engagement as written in the engagement letter signed by both parties. formal terms of engagement between the PSAA's appointed auditors and audited bodies. Our responsibilities Reminder of our responsibilities as set out in the engagement letter The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies. Planning and audit Communication of the planned scope and timing of the audit, any limitations and the significant risks identified. Audit Plan - 3 March 2020 approach When communicating key audit matters this includes the most significant risks of material misstatement (whether or not due to fraud) including those that have the greatest effect on the overall audit strategy, the allocation of resources in the audit and directing the efforts of

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

the engagement team

We have detailed the communications that we must provide to the Audit & Risk Committee Committee .

Other matters if any, significant to the oversight of the financial reporting process

Audit Results Report - July 2020



Required communications with the Audit Committee (continued)

		Our Reporting to you
Required communications	What is reported?	When and where
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 - July 2020
Misstatements	 Uncorrected misstatements and their effect on our audit opinion, unless prohibited by law or regulation The effect of uncorrected misstatements related to prior periods A request that any uncorrected misstatement be corrected Corrected misstatements that are significant Material misstatements corrected by management 	Audit Results Report - July 2020
Fraud	 Enquiries of the Audit & Risk Committee 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 - July 2020
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 - July 2020



Required communications with the Audit Committee (continued)

		Our Reporting to you
Required communications	What is reported?	When and where
Independence	Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence	Audit Results Report - July 2020
	Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as: The principal threats Safeguards adopted and their effectiveness An overall assessment of threats and safeguards	Audit Plan - 3 March 2020
	► Information about the general policies and process within the firm to maintain objectivity and independence	
External confirmations	 Management's refusal for us to request confirmations Inability to obtain relevant and reliable audit evidence from other procedures 	Audit Results Report - July 2020
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 & Risk Committee Committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the Committee may be aware of 	Audit Results Report - July 2020
Internal controls	► Significant deficiencies in internal controls identified during the audit	Audit Results Report - July 2020



Required communications with the Audit Committee (continued)

		Our Reporting to you
Required communications	What is reported?	When and where
Group audits	 An overview of the type of work to be performed on the financial information of the components An overview of the nature of the group audit team's planned involvement in the work to be performed by the component auditors on the financial information of significant components Instances where the group audit team's evaluation of the work of a component auditor gave rise to a concern about the quality of that auditor's work Any limitations on the group audit, for example, where the group engagement team's access to information may have been restricted Fraud or suspected fraud involving group management, component management, 	Audit Results Report - July 2020 Audit Plan - 3 March 2020
	employees who have significant roles in group-wide controls or others where the fraud resulted in a material misstatement of the group financial statements	
Representations	Written representations we are requesting from management and/or those charged with governance	Audit Results Report - July 2020
Material inconsistencies and misstatements	Material inconsistencies or misstatements of fact identified in other information which management has refused to revise	Audit Results Report - July 2020
Auditors report	 Key audit matters that we will include in our auditor's report Any circumstances identified that affect the form and content of our auditor's report 	Audit Results Report - July 2020
Fee Reporting	 Breakdown of fee information when the audit plan is agreed Breakdown of fee information at the completion of the audit Any non-audit work 	Audit Results Report - July 2020 Audit Plan - 3 March 2020



Additional audit information

Other required procedures during the course of the audit

In addition to the key areas of audit focus outlined in section 2, we have to perform other procedures as required by auditing, ethical and independence standards and other regulations. We outline the procedures below that we will undertake during the course of our audit.

Our responsibilities required by auditing standards

- ▶ Identifying and assessing the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.
- Dobtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control.
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Concluding on the appropriateness of management's use of the going concern basis of accounting.
- Evaluating the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtaining sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Authority to express an opinion on the consolidated financial statements. Reading other information contained in the financial statements, including the board's statement that the annual report is fair, balanced and understandable, the Audit & Risk Committee Committee reporting appropriately addresses matters communicated by us to the Committee and reporting whether it is materially inconsistent with our understanding and the financial statements; and
- Maintaining auditor independence.



Additional audit information (continued)

Purpose and evaluation of 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 Authority financial statements; and
- ► The level of work performed on individual account balances and financial statement disclosures.

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.



Contents at a glance



This sector briefing is one of the ways that we support you and your organisation in an environment that is constantly changing and evolving.

It covers issues which may have an impact on your organisation and the Local Government sector as a whole.

The briefings are produced by our national Government and Public Sector (GPS) team, using our public sector knowledge, and EY's wider expertise across UK and international business.

The briefings bring together not only technical issues relevant to the Local Government sector but also wider matters of potential interest to you and your organisation.

Links to where you can find out more on any of the articles featured can be found at the end of the briefing.

We hope that you find the briefing informative and should this raise any issues that you would like to discuss further please contact your local audit team.

1



EY Club item

Economic forecast - EY Club item

The latest EY ITEM Club forecast highlights that continued uncertainties – including those surrounding Brexit – and the weak economic global environment continue to weigh on the UK economy post the General Election. Fiscal policy will be more supportive than previously planned, with the 2020/21 spending review indicating that public spending will rise by 4.1% in real terms. This briefing considers the prospects for social care funding and the housing crisis.

The EY ITEM Club anticipates that continued Brexit uncertainty will restrict UK economic growth in 2020

The EY ITEM Club's autumn forecast predicts relatively weak UK GDP growth of just 1.0% in 2020. This reflects an assumption that the UK will leave the EU at the end of January with Boris Johnson's withdrawal agreement, in addition to the fact that uncertainty

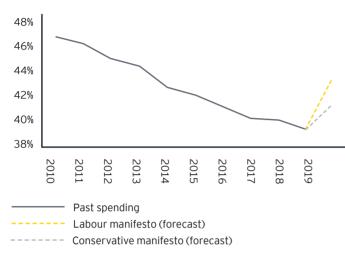
around the UK's future relationship with the EU remains. This is likely to limit any recovery in business investment in the immediate future. Geopolitical and trade pressures weighing on the global economy are also likely to cause a drag on the UK economy.

UK GDP growth for 2019 remains on track to be 1.3% in 2019, in line with past EY ITEM Club forecasts and representing a slight decline on the 1.4% figure for 2018. By comparison, 1.0% in 2020 would be a significant decline, and this is likely to have important consequences for local government.

Local authorities will likely need to continue to be innovative to deliver high quality social care

Chancellor Sajid Javid has pledged public spending increases of 4.1% in real terms in the 2020/21 spending review – the fastest increase in 15 years – whilst it is anticipated that the Budget for 2020/21 will contain further fiscal loosening measures. Austerity to the extent of the past decade appears to be at an end.

Figure 1: UK public sector spending (% of GDP)



Sources: Office for Budget Responsibility; BBC

Despite this, the Conservative manifesto pledges maintaining the £1bn of grant funding announced in the last spending review for the duration of the next parliament as well as £500mn of funding for potholes (in contrast with an extra £13bn proposed by the Labour manifesto).

The Conservative manifesto is light on detail on social care reform that has been anticipated in the continuously delayed green paper. On top of the maintenance of the £1bn of grant funding, they refer to the need for more staff, better infrastructure and a new entitlement to an extra week of leave for people undertaking care on an unpaid basis. But this falls short of a long-term solution, which the Conservatives have stated needs to come from crossparty consensus. It also does not indicate how the manifesto commitment that 'no one needing care has to sell their home to pay for it' will be achieved. $^{\rm 1}$

Until more clarity emerges in this regard, local authorities may continue to be financially and operationally squeezed in their delivery of social care. This is compounded by the fact that there were 136,000 job vacancies in the health and social work sector (17% of all UK vacancies),² whilst labour markets remain tight, with unemployment of 3.9% just one percentage point above

the joint-lowest level since 1974. Despite this, continued funding constraints will mean that badly needed wage growth in the sector is unlikely to materialise to a great extent in the next year, even given recent strong economy-wide wage growth. Furthermore, UK wide productivity remains low, with Q2 2019 being the fourth consecutive quarter without growth.

The housing crisis remains a major pressure on local government

The latest RICS survey indicated that average housing stock levels on estate agents' books in September were close to the lowest level in the survey's history. Housing market activity is also forecast to remain below the 2016 peak until at least 2023. The Government's initiatives to boost house building will take time to have a significant effect, so are unlikely to markedly influence housing availability in the short term at least. In addition, the proportion of new houses that will be affordable must also be seen as a significant measure as to the effectiveness of central government policy dealing with the housing crisis.

Local authorities therefore continue to take up the mantle in combating the crisis, with 78% of councils having a housing or property company as of March 2019. Councils are finding different ways of delivering, developing their own land in some cases and making acquisitions in others, working with different types of partners and providers, and applying focus to affordable housing and various specific-need groups (such as the elderly).³

Certainty elusive as Brexit continues to dominate the political agenda

The Conservatives' primary election campaign promise to 'Get Brexit Done' only represents the beginning of a long process of trade deal negotiations, both with the EU and other third partners. The Government has stated its intention to negotiate a deal with the EU next year, not extending the implementation period beyond 2020. That said, the delays to the withdrawal agreement process suggest that it is difficult to guarantee this. Furthermore, the Government plans to agree new free trade agreements to cover 80% of UK trade over the next three years.¹ Economic and political uncertainty are therefore likely to remain prominent during this period, if not beyond.

¹The Telegraph, 'Conservative Party manifesto 2019', 10 December 2019, [online]. Available at: https://www.telegraph.co.uk/politics/2019/12/10/conservative-manifesto-2019-nhs-election/

²Office for National Statistics, 'Vacancies and jobs in the UK', 12 November 2019, [online]. Available at: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/jobsandyacanciesintheuk/november 2019

³ Inside Housing, 'Councils are finding their building confidence', 15 March 2019, [online]. Available at: https://www.insidehousing.co.uk/sponsored/sponsored/councils-are-finding-their-building-confidence?

Central government is therefore likely to remain focused on international trade and relations over the next few years. It will become increasingly important for local government to continue to play a leading role in society, delivering vital services for local residents. There is little in the EY ITEM Club's forecasts to suggest that the economy will provide much support in meeting these challenges.

The need for innovation to improve the social care system's capacity

The lead up to the UK election saw all major political parties making proposed commitments to expand social care. The newly elected Conservative government has stated that the social care system needs to 'give every person the dignity and security they deserve'. Aside from a commitment to maintain the extra £1bn of grant funding, there has been little further detail about what social care reform may happen in the term of the Parliament.

This financial commitment contributes, albeit probably not sufficiently, to the proposed funding gap. However, funding in the social care system is not the only shortfall; recent research by the Nuffield Trust has suggested there are 165,000 over 65s with unmet care needs and providing these with just two hours of care a day would require 90,000 new home care workers. This doesn't consider any other forms of social care, such as adults with special or complex needs. Therefore, the shortfall of 90,000 care workers is likely to be a prudent figure.

Successful expansion of the social care system will be heavily influenced by macroeconomic conditions.

Any expansion of the social care system in the UK will need careful consideration of the existing conditions in the labour market. The current unemployment rate of 3.9% stands at near record low levels. However, despite nominal wage growth standing at its highest rate since 2008, real wage growth remains near zero. These conditions will make it challenging to expand the workforce of the social care system without significantly increasing spending or looking for alternative means of delivery.

It is possible to establish an economically sustainable social care system.

There are examples of successful social care system transformations from across the globe that provide insightful lessons for potential reform in the UK's social care system.

In 2013, the Australian Government introduced a universal social care system referred to as the National Disability Insurance Scheme (NDIS). The NDIS entitles people with a 'permanent and significant' disability (under the age of 65), to full funding for 'any reasonable and necessary' support needs relating to their disability (subject to certain restrictions). Funding is allocated to the individual, and the individual or their guardian chooses which providers supply the funded goods and services (subject to other restrictions). The scheme is entirely publicly funded.

Research commissioned by the Australian Government in 2011, found that by approximately 2025 the cost of maintaining the status quo in relation to the care of people with a disability would be greater than the cost of an NDIS. The status quo heavily relied on a fragmented funding system of grants that offered little long-term security for those with disabilities. A broken system was deemed to be constraining those with special needs' ability and the ability of their carers to participate in Australian society. Other downstream costs of the status quo included those seen in the criminal justice system, health system, homelessness and costs relating to social isolation.

Expanding social care requires innovation and careful consideration of labour supply and community needs.

There was a clear need to overhaul the social care system in Australia, however it meant the disability sector in Australia would need to double its workforce to meet the needs of the NDIS. Consultations on the NDIS to date have highlighted several key issues that would be of important consideration in the proposed expansion of social care in the UK:

Vulnerable clients: the communities that some providers serve may have complex and more pressing needs, including isolation, complex disability support and challenges in selfdetermining their needs. These clients require more highly qualified staff to service their needs.

- Higher operating costs: low client numbers (or difficulty in finding connection with clients that are in a region), and/or highly dispersed clients result in high per-client costs under existing staff utilisation.
- Workforce: challenges in recruiting and retaining qualified workers as well as providing learning and development opportunities.
- Temporary supply gaps during transition: temporary supply gaps during transition to full implementation of the scheme, where some supports (such as certain specialist supports and Allied Health services) take time to reach levels required to meet demand.
- Geographic isolation: physical distance and travel time results in high costs for service delivery for isolated or highly dispersed communities.

Many of these challenges would likely impact any proposed expansion of the social care workforce in the UK too. Focus should therefore be applied to mitigating these during the formation of any associated policy. However, what else should be considered in the need to expand social care?

The need to improve capacity

The call to expand the social care system pertains to the current and growing challenge of lack of capacity in the system. Whilst expanding the workforce is one means to try and tackle this, so is improving productivity. Where significant workforce challenges exist, then focusing on technologically enabled productivity gains is likely to be crucial.

There are a range of opportunities through which technology has the potential to improve the productivity of the social care system:

- Managing front-door demand: predictive analytics can now be used to identify risk and vulnerable groups to proactively target interventions before demand materialises.
- Making existing service delivery for staff more efficient: Robotic Process Automation (RPA) and Artificial Intelligence (AI) applications provide improved productive capacity and flexibility for staff through streamlined processes and automated administration tasks, allowing staff to focus on supporting user needs.
- Technology-enabled care: assistive technology provides a vehicle to personalise and tailor support, reducing intrusion whilst providing a platform for connectivity and care, such as virtual reality empathy training, real time care monitoring and work flowed predictive analytics.
- Procurement and commissioning: data driven decision making through predictive analytics, digital care planning and eBrokerage now provides an effective platform for evidencebased outcome-focused commissioning.

It is vital that any proposed expansion of the social care system doesn't purely focus on increasing the number of social care workers. The system needs fundamental transformations in its digital infrastructure and it is through the productivity gains that can be yielded from those, that the system can best overcome its capacity challenges.

The EY ITEM Club forecast for the UK economy, autumn 2019								
% changes on previous year								
	GDP	Domestic demand	Consumer spending	Fixed investment	Exports	Imports		
2017	1.9	1.2	2.2	1.6	6.1	3.5		
2018	1.4	1.4	1.6	-0.1	-0.9	0.7		
2019 (forecast)	1.3	2.3	1.2	-0.3	-0.1	4.3		
2020 (forecast)	1	0.8	1.4	-0.4	1.1	0.3		
2021 (forecast)	1.5	1.8	1.8	2.7	2.5	3.1		
2022 (forecast)	1.7	2	1.9	2.3	3.2	3.8		
2023 (forecast)	1.8	2	2	2.6	3.5	3.7		

Future Funding for Vital Services

Research conducted by the Institute for Fiscal Studies (IFS) has predicted that council tax revenues will significantly fall short of the funding required to provide key services, including social care. If council tax revenues increase at their current rate in line with inflation at 2% then this would result in a shortfall of £4bn by 2024/25, rising to £18bn by the mid-2030s. An increase in council tax by 4% per year would still result in a shortfall of £1.6bn by 2024/25 and £8.7bn by 2034/35. There have been calls within the local authority sector to significantly reform and address the issue of long-term sustainable funding for social care.

The research has also concluded that councils have cut other services by up to 40% since 2010 in order to protect social care spending. Local authority budgets are under significant pressure due to a decade of funding cuts from central government and increased cost pressures from increased demand for services. The IFS has found that budgets of local authorities are increasingly focused on fulfilling statutory duties and focusing spending on those that need it the most, as opposed to providing equitable services to all. This has resulted in significant cuts to a range of services previously provided by local authorities that are not required under statute. For example, per-person spending on culture and recreation is 50% lower in 2019/20 compared to 2009/10.

Similar analysis conducted by the Trade Union Congress has found that funding for key local services related to social care, waste management and transport have fallen by, on average, 16% since 2010. There were significant regional variations with the North East and North West regions showing a fall of 20% compared to 2010 levels, whilst some metropolitan boroughs in London had a 30% decrease.

Local authorities have become increasingly more reliant on council tax and business rates income. Excluding educational spend, half of all spending is funded from council tax whilst 30% of spend is funded from business rates. With reform of business rate retention and Fair Funding reviews on the horizon, it is likely that councils will become even more reliant on council tax and business rate income. Consequently, authorities with a smaller tax base may find that their sources of revenue fall behind neighbouring authorities with a larger tax base.

Public Works Loan Board (PWLB) Interest Rate Increase

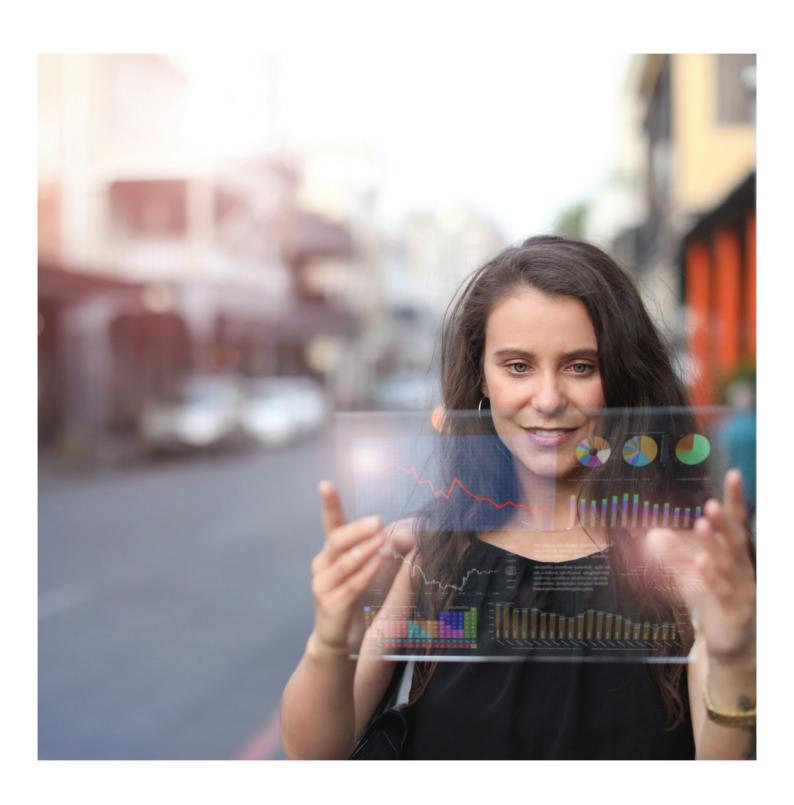
On 9 October 2019 HM Treasury announced a 1% interest rate increase for all new PWLB loans with immediate effect. The Secretary of State for Housing, Communities and Local Government noted that this was a necessary step to control the increase and dependency on PWLB borrowing. Total PWLB borrowing increased by 72% from 2017/18 to 2018/19 to £9.1bn new loans across all local authorities before this interest rate hike.

A spokesman from the Local Government Association (LGA) has commented that this PWLB rate increase could cost councils an extra £70mn a year. This may put at risk many vital capital schemes, including the construction of much needed council houses, which may now be delayed or cancelled due to unaffordability. The London Councils umbrella group have also indicated that the interest rate increase is likely to have a 'severe impact' on housing and regeneration schemes.

The credit rating agency Moody's has commented that the PWLB interest rate increase is overall 'credit negative' for the sector as the cost of capital for local authorities on new borrowing will increase in the short term. However, in the long term, the increase in interest rates should reduce the overall level of debt accumulated in the sector.

Moody's have also predicted that the rate hike will deter some councils from borrowing to invest in commercial property schemes with marginal returns. This comes as the chief executive of the Chartered Institute of Public Finance and Accountancy (CIPFA), Rob Whiteman, has commented that central government has concerns on the types of commercial property investments entered into by local authorities. Some of which are controversial due to the scale of borrowing and the increase in exposure to economic volatility for local authorities. He warned that 'the PWLB [interest rate] hike was a very blunt instrument' and does not help the sector as whole. However, if controversial commercial investments continue within the sector then it is likely that central government will impose greater regulation upon local authorities, or even sanctions if CIPFA's Prudential Code is not adhered to.

The initial impact of the interest rate increase on PWLB loan borrowing has suggested that the value of new loans drawn down in October 2019 has decreased by 71% compared to September 2019. In response to interest rate hike councillors and mayors from multiple London Boroughs have written to the Chancellor of the Exchequer calling on him to reverse the increase.





Going Concern

In response to recent well-publicised corporate failures, the Financial Reporting Council (FRC), the regulator of external auditors, has issued a revised standard on going concern, International Standard on Auditing ('ISA') (UK) 570. The revised standard is effective for audits of financial statements for periods commencing on or after 15 December 2019 (e.g., the 2020/21 accounts), with early adoption possible.

The uncertain economic environment, risks arising from Brexit and weakness in the retail sector due to falling consumer spending mean increasing risks around going concern in the corporate sector. These risks are also prevalent, to a lesser extent, in local government. Public interest expectations around the work of auditors on going concern, and the FRC's expectations on how we robustly challenge management, have also never been higher.

The revised standard increases the work auditors are required to perform when assessing whether an entity is a going concern. As a starting point, the expectation of the regulator is that there are going concern uncertainties in every business which must be identified by the auditor, before a robust consideration of management's assessment is carried out. This requires auditors to perform:

 An enhanced risk assessment to inform the auditor's challenge of management's identification of events or conditions impacting going concern, more specific requirements to test management's resulting assessment of going concern, an evaluation of the supporting evidence obtained which includes consideration of the risk of management bias:

- If we identify events or conditions that management did not, further procedures are required including consideration of control weaknesses and risk of fraud.
- The testing of management's method of assessment, assumptions, the relevance and reliability of data, management's future actions and events since management's assessment are more explicitly described in the new standard, although many of the required steps will reflect current best practice.
- The evaluation of evidence when we draw our conclusions on going concern includes a stand back requirement to consider all the evidence obtained (whether corroborative or contradictory) and consideration of management bias even if all judgements and assumptions are individually reasonable.
- Financial statement disclosures around going concern now need to be considered for 'appropriateness' not 'adequacy'.
- Extended requirements to report to regulators where we have concerns about going concern.

Your local audit team will provide further details later in 2020 on what these changes might mean for the work management must perform on going concern and the expectations of the audit team.

Public Sector Audit Consultations

There are two recent consultations which may change the shape of public sector financial reporting and auditing. These are:

- Independent review into the arrangements in place to support the transparency and quality of local authority financial reporting and external audit in England (Call for Views) led by Sir Tony Redmond; and
- Local audit in England Code of Audit Practice Draft Code Consultation led by the National Audit Office (NAO Code).

We believe reforms should be guided by the following principles:

- Reforms should enhance, or at least should not create risks to, the quality of financial reporting and external audit
- The importance of the multidisciplinary audit firm model, to enable local auditors to respond efficiently and effectively to the increased reporting complexity and risks facing public sector bodies
- There should not be a two-tier system of generally accepted accounting and auditing standards between the public and corporate sectors; and
- To be effective and sustainable, reforms need to focus on the public sector financial reporting and external audit ecosystem as a whole (e.g., public bodies governance, controls, reporting and auditing). This should include changes to how local auditors conduct and report on local public bodies' Value for Money arrangements.

We also believe that increased transparency of reporting to local taxpayers and other users of accounts is needed to improve the effectiveness of local public bodies' corporate governance, financial position, risk appetite and rationale for significant decisions.

The Call for Views and changes to the NAO Code comes at a time of significant scrutiny of the UK audit market and profession. We believe it is crucial that the outcomes from the Call for Views, and the finalisation of the NAO Code, is closely aligned with the outcome of these various reviews.

We have responded to both consultations and are committed to work with Sir Tony Redmond, the UK government and the NAO in support of improving the transparency and sustainability of public sector financial reporting and external audit. In our next briefing, we will share the key messages in our responses to both consultations. We encourage Audit Committees to be aware of and contribute its views to these important consultations and developments and your Engagement Lead will be happy to discuss these matters with you.

CIPFA Publications: Financial Management and Commercial Investments

On 11 October 2019 CIPFA launched its first financial management code in 15 years. The financial management Code (FM Code) is designed to help officers navigate the increasing complex issues of public sector finance, including financial sustainability. The FM Code requires all local authorities, including police, fire and other authorities, to demonstrate that the processes they have in place satisfy the principles of good financial management. The FM Code identifies risks to financial sustainability, introduces a framework of assurance and sets explicit standards of financial management. Complying with the standards set out in the FM Code is the collective responsibility of elected members, the chief finance officer and the leadership team. Ultimately the FM code aims at improving financial decision making.

The FM Code is built on elements of other CIPFA codes and applicability will be familiar to users of publications such as The Prudential Code for Capital Finance, Treasury Management in the Public Sector Code of Practice and Code of Practice on Local Authority Accounting in the United Kingdom.

CIPFA chief executive, Rob Whiteman, said that "CIPFA's ambition was to embed good financial management as an organisational responsibility ... and move towards a sense of collective responsibility when it comes to finance." The National Audit Office Auditor General, Gareth Davies, welcomed the new financial management code as it will help local authorities to improve their standards of financial management and cope with the financial challenges they are facing.

CIPFA has also issued new guidance for local authorities on what is expected from them when commercial property investments are made. The institute has warned that authorities must not borrow more than, or in advance of, their needs purely in the interest of profit. The cornerstone of this new guidance, published on 15 November 2019, is that under the prudential framework local authorities should not put public money and services at risk to the extent that an investment bank or commercial investor may legitimately do with their shareholders' funds.



Green Revolution

Although 230 English councils have declared climate emergencies over the past year, there has been a slow rollout of industrial strategies and policies to implement clean growth development opportunities. Climate action groups are calling on a proportion of the UK Share Prosperity Fund to be ringfenced for climate projects that enable clean growth. This would assist the Government to achieve its net zero carbon target by 2050 through implementation of local schemes. The Green Alliance's head of policy has called on local policy makers to put clean growth at the heart of local industry strategies to attract industries of the future and to enable local resilience in a world affected by climate change.

The Friends of the Earth group have analysed and ranked each local authority based on their green credentials. The group is calling on all local authorities to do more to combat climate change, including improving the energy efficiency standards of new build homes. A poll by Unison and ComRes suggests that if councils were to receive increased funding, 39% of the public would like additional money to be spent on prioritising refuse and recycling.

The LGA's environmental spokesperson has suggested that a joint national task force led by councils should be set up to drive

initiatives to make councils more climate friendly. The LGA has also indicated that national climate change targets are unlikely to be achieved unless councils are given long term funding and devolved powers to combat climate change. The chair of the County Council Network has called on the government to engage with local authorities to provide genuine devolution and sustainable funding framework.

EY audit quality and transparency reports

This year, for the first time, EY is publishing a UK Audit Quality Report alongside our UK Transparency Report and both reports are now available on ey.com.

As our profession continues to face scrutiny, we believe it is vital that we are as open and transparent as possible. Together these reports aim to achieve this by setting out how we're addressing our public interest responsibilities and delivering high quality audits.

Our Audit Quality Report sets out the actions we've taken over the last five years to improve audit quality and, importantly, those that we will focus on in the future. We hope that by sharing the details of our long-term and future investment plans with you, this will instil confidence in our commitment to quality.

Audit Quality

We understand our role in society is to serve the public interest. Delivering consistently high quality audits is how we play our part in restoring and sustaining confidence. A commitment to audit quality starts at the top of the organisation. EY leaders set a clear tone from the top by promoting, maintaining and demonstrating a culture based on a commitment to quality, integrity, and collaboration.

It is also critical that we create an environment where our teams are supported to deliver high-quality audits. We have established the Audit Quality Board ('AQB') to take a lead in setting this tone and we hold regular events and issue communications to reinforce a priority on audit quality.

The importance of setting the right expectations for all our audit teams is why 'tone at the top' is the first pillar of our Sustainable Audit Quality ('SAQ') programme.

We have already made significant investments to improve audit quality over the last five years through our SAQ programme. We began this programme in 2014 when we set up the UK AQB and our Audit Quality Support Team and launched annual Audit Quality Summits for our partners and senior staff. Since then, our approach to partner and staff remuneration has been focused on ensuring audit quality is reinforced as a critical factor in determining pay awards.

Our investment in audit quality is now £25mn a year higher than in 2014; however, we recognise that there remains more to do. We will continue to invest to meet the expectations of all our stakeholders and society as a whole.

Exceptional Talent

The competition for talented people with the right mindset to deliver high-quality audits has never been higher. As a result, the profession continues to face challenges with recruiting and retaining the right number of people with the right skills. This has been exacerbated by the increased demands and pressures that the profession is facing in the current environment. We are committed to attracting, developing, inspiring and retaining outstanding audit professionals and promoting an inclusive culture for them to be able to deliver to the best of their abilities. We have been recruiting, and continue to recruit, across our business and aim to deliver an exceptional experience for our people throughout the recruitment process their career.

Accountability

Society as a whole and our regulators rightly expect us to be accountable for the work we perform. Without this accountability being recognised and responded to at all levels in the audit process, we will not achieve the improvements we need to make in delivering consistently high quality audits. We believe that, as auditors, we are accountable not just to ourselves, but to our teams, our organisation, our stakeholders and the public interest. We have embedded a culture of accountability at all levels of the audit process, whilst also providing the support necessary for our people to take responsibility for their work. We are further reinforcing the importance of accountability through the SAQ programme, our quality ratings and our partners' performance evaluations. Monitoring our audit performance and the effectiveness of our actions to improve audit quality is a key part of our system of quality control and the activities of the AQB, ensuring that we hold ourselves fully accountable for the quality of work we do.

Audit Technology and Digital

The extent to which the entities we audit create and use data has increased significantly. This generates a unique opportunity to drive greater assurance and hence improve audit quality through the appropriate analysis of this data. During the past five years, we have been undergoing an unprecedented transformation in our capability to leverage and interrogate the data created by the entities we audit and in improving our own technology supporting the audit process. This allows us to increase audit quality not only through improved data analysis, but also through using technology to improve project management, timely review and resolution of issues identified in our audits.

To take advantage of the opportunities offered by innovative technologies in every EY audit, we have transformed EY's Global Audit Methodology (GAM) to put data at the heart of the audit. Known as EY Digital GAM, this new approach has been piloted in 2019 and will be phased in globally from 2020. Digital GAM is powered by our digital audit technology, using this to embed data analysis and automated techniques in all phases of the audit. It also simplifies certain tasks and improves linkage from one audit procedure to another.

This updated methodology will further enhance audit quality through:

- The standardising or automating of routine audit tasks, enabling teams to focus on identified anomalies or higher risk judgemental aspects of the audit; and
- Providing greater clarity on the risks inherent in an organisation, driving a more focused audit approach.

Simplification and innovation

A natural response to regulatory inspection findings and the pressures we face to deliver the highest quality audits is to do more and more work; however, if this is not targeted in the right areas or effectively performed, it can actually be counterproductive. The quality of our audits is improved where we can also deliver simplification and innovation in the way we perform and document our work. In a world of ever-increasing complexity and data availability, we have innovated our audit technologies and approach – not only to stay ahead of these changes, but also to use them to our advantage and improve audit quality. Where possible, we have also used this opportunity to simplify our work, giving our audit teams greater clarity on key risks and increased time to focus on these.

Enablement and Quality Support

The complexity of the organisations we audit continues to increase, making risk assessment and key audit judgements ever more difficult. At the same time, the expectations of all our stakeholders for us to perform high-quality audits and provide trust and confidence also increases. We have to ensure that we have the right support for our audit teams to help them address complexity, challenge management appropriately and document our judgements clearly. We have always provided, and continue to provide, technical accounting and risk management support

to our audit teams as required. Since 2014 we have significantly increased the level of support provided to individual audit teams, particularly those on our most challenging and complex audits. This includes coaching programmes and coaching kits, as well as other processes designed to improve audit quality. Importantly, we also routinely monitor audit quality indicators and have in place processes to learn quickly from both positive and negative quality outcomes.

There is no doubt we are in challenging times and there is uncertainty ahead. Our main focus will continue to be on delivering high-quality audits and we have every confidence that the steps we have taken, and those we plan to make, to deliver audit quality are the right ones. We will continue to support our audit teams through the investment in technology, processes and, most of all, in our people. Our purpose must be to deliver audits of the highest quality and provide confidence to the capital markets and other stakeholders.

Our Transparency Report, meanwhile, sets out what we do as a firm, how we're structured and governed, how we manage risk and comply with regulation, and how we performed in FY19. During the year we established our Audit Risk Committee, to expand our risk-scanning processes on audits. The goal is to ensure that we appropriately identify high risk clients and sectors and tailor our approach to them. Looking ahead to 2020, we have a number of priority areas which include additional investment in people, increasing the scope of our Audit Quality Support Team, championing new ideas and innovation and enhancing our focus on promoting the desired culture and behaviours for audit quality.

We hope these reports offer a useful means to assess our policies and processes for maintaining independence and complying with relevant standards and regulations.

Key Questions for the Audit Committee

Future Funding for Vital Services

What is the largest cost pressure or funding gap for your authority? What actions are your authority taking to address future budget gaps in the medium to long term?

To what extent is your authority reliant on its tax based to fund services?

Public Works Loan Board (PWLB) Interest Rate Increase

What impact has the PWLB interest rate increase had on your authority? Has your authority reviewed the continuing financial viability of its commercial investments?

How does your authority intent to achieve its capital strategy objectives considering the PWLB interest rate increase?

Going Concern

Have you discussed with your auditors what impact the revised standard on going concern will have on your consideration of going concern and the changes to your audit?

Public Sector Audit Consultations

Did your authority participate in the public sector audit consultations?

What reforms do you believe are key to the future sustainability of public sector financial reporting and auditing?

CIPFA Publications: Financial Management and Commercial Investments

How has your authority adopted and implemented CIPFA's new Financial Management code?

What impact does CIPFA's guidance on commercial property investments have for your authority? Do the authority's commercial activities place the public's money at risk?

Green Revolution

How does your authority's local industrial strategy enable clean growth?

What action is your authority taking to combat climate change? How does your authority plan to achieve the net zero carbon target by 2050?

EY audit quality and transparency reports

Have you discussed with your auditors the benefits of a digital audit?

Find out more

Future Funding for Vital Services

https://www.publicfinance.co.uk/news/2019/11/major-gap-between-council-revenue-and-funding-needed-says-ifs

https://www.publicfinance.co.uk/2019/11/ifs-councils-sacrificing-other-services-protect-social-care

Public Works Loan Board (PWLB) Interest Rate Increase

https://www.publicfinance.co.uk/news/2019/10/increased-pwlb-interest-rate-rise-puts-capital-projects-jeopardy

https://www.publicfinance.co.uk/news/2019/11/whiteman-councils-risky-commercial-deals-could-prompt-increased-regulation

Going Concern

https://www.iaasb.org/publications-resources/international-standard-auditing-isa-570-revised-going-concern

Public Sector Audit Consultations

https://www.nao.org.uk/code-audit-practice/code-of-audit-practice-consultation/

https://www.gov.uk/government/news/call-for-views-for-independent-review-into-local-authority-audit

CIPFA Publications: Financial Management and Commercial Investments

https://www.cipfa.org/policy-and-guidance/publications/f/financial-management-code

https://www.publicfinance.co.uk/news/2019/10/cipfa-unveils-financial-management-code

https://www.cipfa.org/policy-and-guidance/publications/p/prudential-property-investment

Green Revolution

https://www.publicfinance.co.uk/news/2019/10/councils-need-funding-and-powers-create-greener-local-strategies

https://www.publicfinance.co.uk/news/2019/10/local-authorities-need-be-more-environmentally-friendly

EY Reports on audit quality and transparency

https://assets.ey.com/content/dam/ey-sites/ey-com/en_uk/about-us/transparency-report-2019/ey-uk-2019-audit-quality-report.pdf

https://www.ey.com/Publication/vwLUAssets/ey-uk-2019-transparency-report/\$FILE/ey-uk-2019-transparency-report.pdf

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