Audit Completion Report

Broxtowe Borough Council Year ending 31 March 2020





Mazars LLP Park View House 58 The Ropewalk Nottingham NG1 5DW

Governance, Audit and Standards Committee Members Broxtowe Borough Council, Town Hall, Foster Avenue Beeston Nottingham NG9 1AB

November 2020

Dear Members

Audit Completion Report – Year ended 31 March 2020

We are pleased to present our Audit Completion Report for the year ended 31 March 2020. The purpose of this document is to summarise our audit conclusions.

The scope of our work, including identified significant audit risks and other areas of management judgement, was outlined in our Audit Strategy Memorandum which we issued in March 2020 and received by the Governance, Audit and Standards (G,A&S) Committee on 18 May 2020. Since we issued our Audit Strategy Memorandum the UK has been subject to the challenges and restrictions of COVID-19. We have reviewed our Audit Strategy Memorandum and concluded that the original significant audit risks and other areas of management judgement remain appropriate.

One implication of COVID-19 for the Council was that the deadlines for submission of the draft and audited financial statements were pushed back to 31 August and 30 November respectively. Despite the revised deadlines we acknowledge the difficulties encountered by your team during accounts preparation, who worked to an internal deadline of 30 June 2020 to publish its draft financial statements. This was significantly ahead of the revised publication deadline. We would also like to express our thanks for the assistance of your team during our audit.

If you would like to discuss any matters in more detail then please do not hesitate to contact me on 07875 974 291.

Yours faithfully

Mark Surridge Mazars LLP

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We are registered to carry on audit work in the UK by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at www.auditregister.org.uk under reference number C001139861. VAT number: 839 8356 73.

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Our reports are prepared in the context of the 'Statement of Responsibilities of auditors and audited bodies' and the 'Appointing Person Terms of Appointment' issued by Public Sector Audit Appointments Limited. Reports and letters prepared by appointed auditors and addressed to the Council are prepared for the sole use of the Council and we take no responsibility to any member or officer in their individual capacity or to any third party. Mazars LLP is the UK firm of Mazars, an international advisory and accountancy group. Mazars LLP is registered by the Institute of Chartered Accountants in England and Wales.



1. EXECUTIVE SUMMARY

Purpose of this report and principal conclusions

The Audit Completion Report sets out the findings from our audit of Broxtowe Borough Council ('the Council') for the year ended 31 March 2020, and forms the basis for discussion at Governance, Audit and Standards Committee meeting on 30 November.

The detailed scope of our work as your appointed auditor for 2019/20 is set out in the National Audit Office's (NAO) Code of Audit Practice. Our responsibilities and powers are derived from the Local Audit and Accountability Act 2014 and, as outlined in our Audit Strategy Memorandum, our audit has been conducted in accordance with International Standards of Auditing (UK) and means we focus on audit risks that we have assessed as resulting in a higher risk of material misstatement.

Sections 2 and 5 of this report outline the detailed findings from our work on the financial statements and our conclusion on the Council's arrangements to achieve economy, efficiency and effectiveness in its use of resources. Section 2 also includes our conclusions on the audit risks and areas of management judgement in our Audit Strategy Memorandum, which include:

- Management override of control;
- · Valuation of property, plant and equipment and assets held for sale; and
- Valuation of net pensions liability.

Status of our work

As we outline on the following page, our work is substantially complete. Subject to the satisfactory completion of the outstanding work, at the time of issuing this report we have the following conclusions:



Status of our audit work

We have substantially completed our work on the financial statements and Value for Money conclusion for the year ended 31 March 2020. At the time of preparing this report the following matters remain outstanding:

Audit area	Status	Description of outstanding matters	
Property, plant and equipment	•	We are awaiting evidence from management to support the underlying assumptions for two residual assets selected for testing. We are also consulting on the form of the audit opinion wording that should be used against the backdrop of COVID-19. We currently expect that the disclosed 'material uncertainty' in property valuations caused by Covid19 will lead to an emphasis of matter paragraph in the audit opinion. We say more on this at page 7.	
Pensions	•	Part of our assurance over the net pensions liability is derived from specified procedures commissioned from the external auditors of the Nottinghamshire Pension Fund. We are yet to receive their final report over the procedures we are seeking assurance over for our consideration. We say more on this at page 8.	
Whole of Government Accounts (WGA)	٠	NAO Group Instructions for local authority 2019/20 audits are not yet available and WGA returns and audit certificates cannot be issued at the present time.	
Audit Quality Control and Completion Procedures		Our audit work is undergoing final stages of review by the Engagement Lead. In addition, there are residual procedures to complete, including agreeing the expected amendments to the final Statement of Accounts, updating post balance sheet event considerations to the point of issuing the opinion, reviewing managements going concern assertion and obtaining final management representations.	

Status

- Likely to result in material adjustment or significant change to disclosures within the financial statements
- Potential to result in material adjustment or significant change to disclosures within the financial statements
- Not considered likely to result in material adjustment or change to disclosures within the financial statements

We will provide the Governance, Audit and Standards (G,A&S) Committee with an update in relation to these outstanding matters in a follow-up letter, prior to signing the auditor's report.







Our audit approach

We provided details of our intended audit approach in our Audit Strategy Memorandum in March 2020. We have not made any changes to our audit approach since we presented our Audit Strategy Memorandum

Materiality

We set materiality at the planning stage of the audit at £1,213k using a benchmark of 2% of Gross Revenue Expenditure. Our final assessment of materiality, based on the final financial statements and qualitative factors is £1,306k using the same benchmark. We revised our trivial threshold (the level under which individual errors are not communicated to the Governance, Audit and Standards (G,A&S) Committee), at £39k based on 3% of overall materiality.

Overview of our group audit approach

Our Audit Strategy memorandum provided details of our intended group audit approach, including our initial assessment of group materiality. The table below confirms the approach we have taken to auditing the Council's consolidated financial statements.

Entity	Nature of entity audit	Auditor	Description of audit procedures undertaken on the component	Changes to audit approach
Broxtowe Borough Council (parent)	NAO Code audit	Mazars LLP	Full Audit	None
Liberty Leisure Ltd (subsidiary)	None – below audit threshold	N/A	Review of the consolidation and sample test of transactions.	None

Group materiality

We set group materiality at the planning stage of the audit at £1,332k using a benchmark of 2% of Gross Revenue Expenditure. Our final assessment of materiality, based on the final financial statements and qualitative factors is £1,448k using the same benchmark. We revised our trivial threshold (the level under which individual errors are not communicated to the Governance, Audit and Standards (G,A&S) Committee), at £43k based on 3% of overall materiality.

Misstatements and internal control recommendations

Section 3 sets out the internal control recommendations that we make

Section 4 outlines the misstatements noted as part of our audit as at the time of issuing this report. If any additional misstatements are noted on completion of the outstanding work, these will be reported to the Governance, Audit and Standards (G,A&S) Committee in a follow-up letter.







Set out below are the significant findings from our audit. These findings include:

- our audit conclusions regarding significant risks and key areas of management judgement outlined in the Audit Strategy Memorandum;
- our comments in respect of the accounting policies and disclosures that you have adopted in the financial statements. On
 page 10 we have concluded whether the financial statements have been prepared in accordance with the financial reporting
 framework and commented on any significant accounting policy changes that have been made during the year;
- any further significant matters discussed with management; and
- any significant difficulties we experienced during the audit.

Significant risks and key areas of management judgement

As part of our planning procedures we considered the risks of material misstatement in the Council's financial statements that required special audit consideration. Although we report identified significant risks at the planning stage of the audit in our Audit Strategy Memorandum, our risk assessment is a continuous process and we regularly consider whether new significant risks have arisen and how we intend to respond to these risks. No new risks have been identified since we issued our Audit Strategy Memorandum.

Significant risk Description of the risk

Management override of controls

In all entities, management at various levels within an organisation are in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. Due to the unpredictable way in which such override could occur, we consider there to be a risk of material misstatement due to fraud and thus a significant risk on all audits.

How we addressed this risk

We addressed this risk through performing audit work over:

- Accounting estimates impacting on amounts included in the financial statements;
- · Consideration of identified significant transactions outside the normal course of business; and
- Journals recorded in the general ledger and other adjustments made in preparation of the financial statements.

Audit Conclusion

Our audit procedures have not identified any material errors or uncertainties in the financial statements, or other matters that we wish to bring to Members' attention in relation to management override of controls.



Value for Mone conclusion



Significant risk Description of the risk

Valuation of land and buildings, investment properties (where applicable) and assets held for sale (where material) The financial statements contain material entries on the Balance Sheet as well as material disclosure notes in relation to the Council's Property, Plant and Equipment that is held at a valuation.

The Council uses an internal valuation expert to provide information on valuations because there is a high degree of estimation uncertainty caused by significant judgements and number of variables involved in providing valuations. We have therefore identified the valuation of material balances of land and buildings, investment properties (if applicable or material) and assets held for sale (if material) to be an area of significant audit risk.

At the outset of the Covid19 outbreak, guidance issued by the Royal Institute of Chartered Surveyors set out an expectation that valuers are likely to conclude that there is "material uncertainty" over the valuation of land and buildings at the balance sheet date.

How we addressed this risk

We have considered the Council's arrangements for ensuring that the valuation of land and buildings are reasonable and also considered whether valuation movements are in line with market expectations using available indices where these were available and appropriate to the Council's circumstances. We have assessed the competence, skills and experience of the valuer.

We test a sample of revaluations in year to valuation reports and supporting calculation sheets to ensure these are consistent with underlying source records (such as floor plans) in addition to challenging the methods and assumptions used by the valuer. Where necessary we also perform further audit procedures on individual assets to ensure that the basis and level of revaluation is appropriate.

In addition, we assess the approach that the Council adopts to ensure that assets not subject to revaluation in 2019/20 are materially correct, including considering the robustness of that approach in light of the valuation information reported by the Council's valuer.

Audit Conclusion

The procedures we have undertaken have not identified any material errors in the financial statements that we wish to bring to Members' attention.

The Council's valuer has included a statement of 'material uncertainty' over the valuation as at 31 March 2020 and we have considered this as part of our testing approach. The Council did not disclose this uncertainty in the draft financial statements, which has been corrected to inform any reader of the accounts.

We have considered the impact to our auditor's report and have included an 'emphasis of matters' paragraph to draw attention to the relevant disclosure note in the financial statements. This is not a modification to the audit opinion and this approach is consistent with our other local authority audits.





2. SIGNIFICANT FINDINGS (CONTINUED)

Significant risk Description of the risk

Valuation of net defined benefit liability

The financial statements contain material pension entries in respect of retirement benefits. The calculation of these pension figures, both assets and liabilities, can be subject to significant volatility and includes estimates based upon a complex interaction of actuarial assumptions. Moreover, the local government pension assets and liabilities are subject to triennial revaluation as at 31 March 2019, which set the contribution rates for 2020/21 onwards. This results in an increased risk of material misstatement.

How we addressed this risk

In relation to the valuation of the Council's defined benefit pension liability in addition to our standard programme of work in this area we:

- review the appropriateness of the Pension Asset and Liability valuation methodologies applied by the Pension Fund Actuary, and the key assumptions included within the valuation. This will include comparing them to expected ranges, utilising information provided by PwC, the consulting actuary engaged by the National Audit Office;
- agree the data in the IAS 19 valuation report provided by the Fund Actuary for accounting purposes to the pension accounting entries and disclosures in the Council's financial statements;
- critically assess the competency, objectivity and independence of the Nottinghamshire Pension Fund's Actuary, Barnett Waddingham; and
- liaise with the auditors of the Nottinghamshire Pension Fund to gain assurance that the controls in place at the Pension Fund are operating effectively. This will include the processes and controls in place to ensure data provided to the Actuary by the Pension Fund for the purposes of the IAS 19 valuation is complete and accurate.

Current position

The procedures we have undertaken to date have not identified any material errors or uncertainties in the financial statements.

Part of our assurance over the net pensions liability is derived from specified procedures commissioned from the external auditors of the Nottinghamshire Pension Fund. We are yet to receive their final report over the procedures we are seeking assurance over for our consideration. These assurances will also inform us of any concerns relating to the valuation of pension fund assets as a result of any uncertainty caused by Covid19. We will need to consider the impact of this on the Council's share of the pension fund assets as show in the balance sheet before issuing our opinion. This may give rise to additional disclosures in the Council's financial statements and also additional 'emphasis of matter' explanation in our Audit Report.

In July 2020, MHCLG consulted on the proposed remedy for the 'McCloud' and 'Sargeant' cases. This indicates that the approach adopted for 2018/19 and 2019/20 is likely to have led to an overstatement of the pension fund liability as at 31 March 2020. The Council obtained advice from the Actuary that the impact was insignificant.

In 2019/20, the impact of McCloud was to increase the liability by £1.1m, the remedy may lead to a reduction in the gross lability, and this ought to be reflected in the valuation at 31 March 2021. We are satisfied the impact is not material to the gross liability estimate.

We will update the Committee if any significant reporting issues emerge from these areas.

recommendation



Value for Mon co<u>nclusion</u>



Significant matters discussed with management

We have, and will continue to have, ongoing dialogue with management over key aspects of the audit. These have included:

- The impact of Covid19 on the entity's business, including potential impact on risks of material misstatement.
- Discussions in connection with the application of auditing standards and fees for audit.

Covid19

We have discussed the impact of Covid19 on the Council's business and concluded there were no additional financial statement significant audit risks arising.

One area of concern arising from Covid19, is the impact on the Council's financial resilience. The full financial impact of Covid19 is not yet certain, however the initial outbreak impacted on the Council's ability to enact its original 2020/21 plan, including income generation and expenditure reductions.

We recognise the Council is working through the implications and considerations through business planning and financial planning updates. The impact on the Council's finances will impact the level of useable reserves and it is important the Council develops clear plans to ensure the Council's financial resilience is assured over the medium term.

Financial Statement Matters: Going Concern

The Council's going concern status is confirmed through the 2019-20 local government accounting code, and must also follow International Accounting Standard (IAS) 1: Presentation of financial statements. We must comply with a revised ISA (UK) 570 Going Concern, effective for periods commencing on or after 15 December 2019. The above, combined with the impact of Covid-19, means an additional level of scrutiny is required over the going concern assertion in 2019/20. In particular, reviewing management's explicit considerations of whether the financial statement disclosure for going concern should more explicitly describe the impact of Covid-19.

We have provided a briefing note to management and have requested the Council perform a formal going concern assessment for 2019/20 prior to us forming our final audit opinion. This was presented to Governance, Audit and Standards Committee on 21 September 2020.

Financial Statement Matters: Financial Instruments

Whilst the Government has introduced a number of measures to ease financial hardship, the Council needed to consider the impact on expected credit losses and the impairment of financial assets.

Financial Statement Matters: Sources of estimation uncertainty, including pension fund assets and liabilities

The Council is required to provide disclosures regarding the key sources of estimation uncertainty that management has made in preparing the financial statements, specifically those with a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities within the ensuing financial year. We are awaiting confirmation from the Pension Fund Auditor as to whether there is a material uncertainty disclosure on the pension fund assets.

Audit fees

As explained in our Audit Strategy Memorandum, we continually strive to maintain high standards of audit quality. One mechanism for doing this is to consider the outcome of independent quality reviews, in particular by the Financial Reporting Council, of our audit work and that of other audit suppliers. In particular, we have increased the level of work we do on:

- · defined benefit pension schemes; and
- valuation of property, plant and equipment

We expect this to be a permanent uplift to the audit fee and have provided management with an estimate, to be confirmed on completion of our work, of £7,067









Significant matters discussed with management

Audit fees

In addition to the fees relating to scope changes to the valuation of land and buildings and in relation to the pension fund assets and liabilities, we have discussed with management the additional audit testing and audit work required relating to:

- · Valuation uncertainty on land and buildings and pension fund assets caused by Covid19;
- · Additional testing and evaluation of the going concern assertion and financial instruments; and
- · Potential changes to the financial statements as a result of the McCloud remedy.

We have provided management with an estimate of between £4,599 and £6,817 for these matters. The final amount will be agreed on completion of our work and be proportionate to the level of specific additional work required.

Qualitative aspects of the Council's accounting practices

We have reviewed the Council's accounting policies and disclosures and concluded they comply with the requirements of the Code of Practice on Local Authority Accounting (the Code), appropriately tailored to the Council's circumstances.

Draft accounts were received from the Council and were of a good quality.

Management co-operation

During the ongoing coronavirus situation, Mazars has implemented clear and decisive measures to ensure the welfare of our people and clients while ensuring that we continue to deliver for those who rely on us. Remote working has meant the audit is not as efficient as we would like or expect, including an extended period of query resolution. This is consistent across all our clients and a reflection of the impact of Covid19.

Management have been under substantial pressure to deliver against many competing priorities since March 2020 and we want to extend our thanks to the finance team for their positive support and co-operation during the course of the audit.

Wider responsibilities

Our powers and responsibilities under the 2014 Act are broad and include the ability to:

- issue a report in the public interest;
- make statutory recommendations that must be considered and responded to publicly;
- apply to the court for a declaration that an item of account is contrary to law; and
- issue an advisory notice under schedule 8 of the 2014 Act.

We have not exercised any of these powers as part of our 2019/20 audit.

The 2014 Act also gives rights to local electors and other parties, such as the right to ask questions of the auditor and the right to make an objection to an item of account. We received no such correspondence.

Possible delay in Audit certificate

The issue of the Audit Certificate confirms that we have discharged all of our audit responsibilities and that the audit is formally 'closed'. The Audit Certificate would normally be published in our Auditor's Report on the Statement of Accounts alongside the accounts opinion and value for money conclusion. The NAO has not yet issued its Group Instructions for local authority audits. If it looks that these Instructions are to be significantly delayed then we may agree with management to issue the Auditor's Report, but without the Audit Certificate, shortly after the audited Statement of Accounts has been approved by the Governance, Audit and Standards (G,A&S) Committee . We would then issue the Audit Certificate separately as soon as we are able to do so. We will update the Governance, Audit and Standards (G,A&S) Committee when more information is known but at this stage the draft Auditor's Report at Appendix B assumes that we will not be able to issue the Audit Certificate alongside the accounts audit opinion and value for money conclusion.

Executive summary

Significant findings

Internal control recommendations



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3. INTERNAL CONTROL RECOMMENDATIONS

The purpose of our audit is to express an opinion on the financial statements. As part of our audit we have considered the internal controls in place relevant to the preparation of the financial statements. We do this in order to design audit procedures to allow us to express an opinion on the financial statement and not for the purpose of expressing an opinion on the effectiveness of internal control, nor to identify any significant deficiencies in their design or operation.

The matters reported are limited to those deficiencies and other control recommendations that we have identified during our normal audit procedures and that we consider to be of sufficient importance to merit being reported. If we had performed more extensive procedures on internal control we might have identified more deficiencies to be reported or concluded that some of the reported deficiencies need not in fact have been reported. Our comments should not be regarded as a comprehensive record of all deficiencies that may exist or improvements that could be made.

Our findings and recommendations are set out below. We have assigned priority rankings to each of them to reflect the importance that we consider each poses to your organisation and, hence, our recommendation in terms of the urgency of required action. In summary, the matters arising fall into the following categories:

Priority ranking	Description	Number of issues
1 (high)	In our view, there is potential for financial loss, damage to reputation or loss of information. This may have implications for the achievement of business strategic objectives. The recommendation should be taken into consideration by management immediately.	NIL
2 (medium)	In our view, there is a need to strengthen internal control or enhance business efficiency. The recommendations should be actioned in the near future.	2
3 (low)	In our view, internal control should be strengthened in these additional areas when practicable.	1





3. INTERNAL CONTROL RECOMMENDATIONS (CONTINUED)

Other deficiencies in internal control – Level 2

Description of deficiency

Related Party Transactions: Declarations of Interest

Whilst we recognise there are procedures for members to declare an interest in any matters during committee meetings, in our testing of related party disclosures, we identified 2 Members did not return a signed declaration of interests form for 2019/20.

Potential effects

Incomplete disclosures and governance transparency

Recommendation

The Council must ensure annual signed declarations are received, even for nil responses.

Management response

Agreed. Following the issuing of a number of reminders to submit their signed related party disclosure declarations, responses were finally received from 43 of the 44 members. For 2020/21 and subsequent years, as well as issuing reminders when declarations have not been received the matter will be raised with the respective Group Leaders to encourage a response.





Other deficiencies in internal control – Level 2

Description of deficiency

Asset valuations

The Council's valuer rightly applies professional judgement to determine the carrying value of assets subject to valuation. Our responsibilities as your auditor, which have significantly increased through regulator expectations, is to apply professional scepticism and professionally challenge those judgements. Compared to other local authorities, the underlying records and the documentation trail to support the Council's valuations needs improvement. For example:

- Some adjustments applied to the valuation were not what were documented on the valuation calculation eg the valuation for a
 property was said to be adjusted from a 2 bed house to a 3 bed house, but in reality the adjustment was made for the condition
 of the property.
- There was little evidence, other than the valuer's own judgement, as to why HRA Beacon Values were adjusted by +/- 10%, whereas we would expect a qualitative or quantitative justification based on historic trends or comparable evidence.

This level of testing and our need to receive satisfactory evidence has meant our work has taken longer this year.

Potential effects

Incomplete disclosures and governance transparency

Recommendation

The Council must review the documentation supporting valuations to ensure there is a clear audit trail and supporting explanations.

Management response

Agreed. The context of individual beacon property valuations always has to be considered. For example, there may not be comparable properties in the local area with which to make meaningful comparisons (eg. recent sales data) and therefore particular assumptions may have to be made in these circumstances. The valuations will always seek to use the available evidence and additional information will be sought where possible. The basis for the subsequent valuations will be fully documented for review.

The valuer's judgement is used when comparable evidence is unavailable for similar property types in similar locations. Comparable evidence was used on every occasion for the March 2020 valuations when it was available and was documented and provided to the external auditor when requested. In terms of historical trends, a valuer will only use evidence from the previous 12 months. Historical trends prior to this will not be used.

If any HRA beacon values (or other asset values) are amended by +/-10% (or some other material factor) then the justification for this will be documented by the valuer when making his valuation so that this can then be reviewed by officers or other inspectors.

It must also be recognised that the beacon method of valuation is designed to allow a large number of houses to be valued quickly and accurately in the 6-8 weeks between the valuation date of 31 January and the requirements of the Finance Services team to check and then enter these details into the various financial systems. With over 90 individual beacon sheets each requiring a valuation, the degree of written analysis and justification able to be provided to the external auditors will be dictated by these timescales. Throughout the audit of the 2019/20 accounts, all of the many questions asked by the external auditors on valuation methodology adopted for each valuation were answered.

Going forward, any specific requirements for the valuer that are set out in the external auditor's final accounts protocol will be addressed, where possible, in the information provided for examination at the interim audit stage.

Executive summa





Value for Money conclusion





Other deficiencies in internal control – Level 1

Description of deficiency

Rolling Programme of Valuations

The Council ensures that all assets are revalued at least once every five years as part of a rolling programme. In our testing of completeness, we reconciled the fixed asset register to the rolling programme, which identified a number of reconciling items where asset names and identifiers were different between the two.

Potential effects

Risk of omission and / or incomplete records.

Recommendation

The Council should reconcile and update the fixed asset register and rolling programme of revaluations prior to 31 March 2021.

Management response

Agreed. The fixed asset register will be reviewed to ensure that it aligns correctly with the rolling programme for asset valuations. For example, properties sold in recent years will be removed and identifiers updated as necessary. This will be done prior to the 31 March 2021 valuations.





4. SUMMARY OF MISSTATEMENTS

We set out below the misstatements identified for adjustment during the course of the audit, above the level of trivial threshold of £36k.

The first table outlines the misstatements that were identified during the course of our audit which management has assessed as not being material, either individually or in aggregate, to the financial statements and does not currently plan to adjust.

Unadjusted misstatements 2019/20

		Comprehensiv Expenditure		Balance	e Sheet
		Dr (£'000)	Cr (£'000)	Dr (£'000)	Cr (£'000)
1	Dr: Short-Term Creditors Cr: Long-Term Creditors			71	71
	Reclassification to split the value of a creditor between assets.	its short-term and long-	term elements. N	o impact on the C	Council's net
2	Dr: Pension Reserve Cr: Pension Liability			45	45
	Variance in the actuarial report relating to the 'return or Council's net asset position.	n plan assets' for consol	lidation of Liberty	Leisure. No impa	ct on the
3	Dr: Deferred income Cr: Grant Income		51	51	
	Correct recognition of Covid19 first trance of income in	to 2019/20 and not 2020	0/21		
4	Dr: HRA - Depreciation Cr: HRA – Council dwellings	275			275
	Component depreciation was understated by £275k du	e to incorrect compone	nt values used.		
	Total unadjusted misstatements	275	51	167	391

In addition to the above:

· The external audit fee of £4k for Liberty Leisure has not been included within the audit fee note

Management's view is that these items are immaterial in the context of the financial statements. The Governance, Audit and Standards (G,A&S) Committee must formally approve management's decision not to adjust the financial statements for these items. These unadjusted misstatements must also be appended to the management representation letter.





4. SUMMARY OF MISSTATEMENTS (CONTINUED)

Audit Adjustments 2019/20

During the course of our work, we discussed and agreed a small number of adjustments to the financial statement disclosures, including but not limited to:

- 1. Amendments identified by management prior to audit were:
 - A journal was missed in respect of the revaluation of General Fund and HRA properties where revaluations were charged to the capital adjustment account (£8,298k)
 - An adjustment of £25k was made between expenditure on Property, Plant & Equipment and Intangible Assets in Note 38. This
 ensured that this note tied up exactly with other notes in the accounts.
- 2. Adjustments through the audit process were:
 - Group Accounts The Council incorrectly added contra figures (£1,315K) to income and expenditure instead of being deducted, changing expenditure from £62,395k to £59,765k and the income from £48,820k to £46,190k. The expenditure is further reduced by £8,298K to £51,467K as set out in point 1 above.
 - Additional narrative disclosure to the "Significant judgements and sources of estimation uncertainty" note: to disclose the impact of 'material valuation uncertainty' as declared by the Council's valuer on property assets.
 - Please note, pending receipt of the Pension Fund Assurance letter, further disclosures may be required on the extent of material valuation uncertainty relating to the Council's share of Pension Fund Assets.
 - Minor narrative changes to the Annual Governance Statement to incorporate the Head of Internal Audit opinion.



Our approach to Value for Money

We are required to form a conclusion as to whether the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The NAO issues guidance to auditors that underpins the work we are required to carry out in order to form our conclusion, and sets out the criterion and sub-criteria that we are required to consider.

The overall criterion is that, 'in all significant respects, the Council had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.' To assist auditors in reaching a conclusion on this overall criterion, the following sub-criteria are set out by the NAO:

- Informed decision making
- Sustainable resource deployment
- Working with partners and other third parties.

Significant Value for Money risks

The NAO's guidance requires us to carry out work to identify whether or not a risk to the Value for Money conclusion exists. Risk, in the context of our Value for Money work, is the risk that we come to an incorrect conclusion rather than the risk of the arrangements in place at the Council being inadequate. In our Audit Strategy Memorandum, we reported that we had identified the following significant risk to our VFM work:

Risk:	Financial resilience		
Description	The continual pressures on Local Government finances are well documented and led to another challenging budget setting process for 2019/20. In order to set a balanced budget a funding gap of £0.615m was met from General Fund reserves and this was approved by the Council in February 2019.		
	The latest forecast shows that the Council is now anticipating withdrawing £1.269m from balances in 2019/20 as opposed to the initial £0.615m as shown above. This is due to the effect of budget carry forwards from 2018/19 of £0.327m plus othe changes approved by the Policy and Performance and Finance and Resources Committees. Moving forward there will be continuing pressure on the Council's General Fund reserve to plug each years' budget deficit. The Council's 2020/21 budge papers show that the General Fund reserve is expected to fall from £6.048m at 1 April 2019 to 3.876 at 31 March 2021.		
	The Medium Term Financial Strategy (MTFS) which projects the Council's position up to 2023/24 based upon a series of assumptions shows that the General Fund reserve will continue to be utilised each year and fall below the minimum balance required of £1.5m in 2022/23 before becoming negative in 2023/24. This pressure upon the General Fund places the Council at increased risk should any adverse unknown or unexpected events occur.		
	There will be significant changes in local government finances over the next few years, which will culminate in a major change in the way local government is financed from 2021/22 onwards. These include the anticipated Comprehensive Spending Review 2020, the Fair Funding Review and the introduction of 75% local retention of business rates (up from 50%). As the funding from 2021/22 onwards is unclear at this stage, the need for savings (or income generation) will continue to have a significant impact on the Council's financial resilience and reduce the burden on the need to utilise reserves to balance any deficits in the budget		
Planned response	We will consider whether the Council has arrangements in place to secure its financial resilience, specifically:		
	 That the MTFP has been updated to reflect known changes in funding, spending plans and the impact on Useable Reserves. 		
	That the MTFP includes sensitivity analysis given the degree of variability and uncertainty in funding.		
	 How and whether the Council has delivered planned savings in 2019/20. 		
	 Whether sufficient progress has been made to identify savings for 2020 onwards. 		

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3. VALUE FOR MONEY CONCLUSION

Risk:	Financial resilience
Observations	During the 2019/20 financial year the achieved an underspend against the revised General Fund budget of £0.362m. This resulted in the Council's net deficit and the expected utilisation of reserves reducing from £1.3m to £0.625m, being £0.450m less General Fund reserves being utilised (after other reserve movements) than planned. The Housing Revenue Account delivered a £0.623m surplus, being a £0.899m underspend compared to revised budget.
	Although a positive outturn position was achieved against the revised budgets, Covid19 heightens the financial challenges to Broxtowe Borough Council over the medium-term:
	 Although £1.187m has been received in funding there will be a shortfall in the 2020/21 budget.
	Savings and income generation included in the original 2020/21 budget are unlikely to be realised.
	• Between April and July 2020, the Council lost £2.4m of income, the longer-term impact is also to be determined.
	 Covid19 also increased the inherent risk to the Beeston square development, with the sale of land being deferred and a future risks aligned to economic recovery from Covid19 to retail and high streets.
	 Liberty Leisure has also been affected with the closure of Leisure centres and the resultant drop in income against the management fee that is payable.
	The Council will need to update forecasts for 2020 and is preparing a revised Medium-Term Financial Plan and business strategy in October 2020. Good progress has been made in identifying options and the Council will need to carefully consider the impact on the general fund over the period 2020/21 to 2022/23 to ensure reserves remain adequate. The Council had anticipated that General Fund reserves may drop below the internally set target of £1.5m in 2022/23, but this is now likely to occur in 2021/22 and so managing the medium-term finances of the Council will be crucial.
	An updated Medium Term Financial Strategy 2020/21 to 2024/25 was presented to the Finance and Resources Committee on 8 October 2020 and an updated Business Strategy 2021/22 to 2022/23 approved at the same meeting. These will be considered as part of our 2020/21 value for money conclusion.
Conclusion	Based on the work performed, the Council's arrangements for the financial year ending 31 March 2020 are adequate.

Our overall Value for Money conclusion

Our draft auditor's report included in Appendix B states that we intend to issue an unqualified Value for Money conclusion for the 2019/20 financial year.





APPENDIX A DRAFT MANAGEMENT REPRESENTATION LETTER

Mark Surridge Mazars LLP 45 Church Street Birmingham B3 2RT

DATE

Dear Mark

Broxtowe Borough Council - audit for year ended 31 March 2020

This representation letter is provided in connection with your audit of the financial statements of Broxtowe Borough Council (the 'Council) and the consolidated financial statements of the Council and its subsidiaries (the 'Group') for the year ended 31 March 2020 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 (the Code).

I confirm that the following representations are made on the basis of enquiries of management and staff with relevant knowledge and experience and, where appropriate, inspection of supporting documentation, sufficient to satisfy myself that I can properly make each of the following representations to you.

My responsibility for the statement of accounts and accounting information

I believe that I have fulfilled my responsibilities for the true and fair presentation and preparation of the statement of accounts in accordance with the Code and applicable law.

My responsibility to provide and disclose relevant information

I have provided you with:

- access to all information of which I am aware that is relevant to the preparation of the financial statements such as records, documentation and other material;
- · additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to individuals within the Council you determined it was necessary to contact in order to obtain audit evidence.

I confirm as s151 Officer that I have taken all the necessary steps to make me aware of any relevant audit information and to establish that you, as auditors, are aware of this information.

As far as I am aware there is no relevant audit information of which you, as auditors, are unaware.

Accounting records

I confirm that all transactions undertaken by the Council (and the Group) have been properly recorded in the accounting records and are reflected in the financial statements. All other records and related information, including minutes of all Council and Committee meetings, have been made available to you.

Accounting policies

I confirm that I have reviewed the accounting policies applied during the year in accordance with the Code and International Accounting Standard 8 and consider these policies to faithfully represent the effects of transactions, other events or conditions on the Council and Group's financial position, financial performance and cash flows.

Accounting estimates, including those measured at fair value

I confirm that any significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable.

I confirm that I am satisfied that the actuarial assumptions underlying the valuation of pension scheme liabilities for IAS19 disclosures are consistent with my knowledge. I confirm that all settlements and curtailments have been identified and properly accounted for. I confirm that all significant retirement benefits have been identified and properly accounted for (including any arrangements that are statutory, contractual or implicit in the employer's actions, that arise in the UK or overseas, that are funded or unfunded).

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APPENDIX A DRAFT MANAGEMENT REPRESENTATION LETTER

Material Valuation Uncertainty

The outbreak of COVID-19, has impacted global financial markets and as such identified that less weight can be attached to the previous market evidence for comparison purposes and to inform opinions of value. The current response to COVID-19 has resulted in an unprecedented set of circumstances on which to base judgement, resulting in the valuations recognised within the Statement of Accounts being reported on the basis of 'material valuation uncertainty' as per VPS 3 and VPGA 10 of the RICS Red Book Global. Given the unknown future impact that COVID-19 might have on the real estate market. I am satisfied that sufficient and appropriate disclosures have been made in the Statement of Accounts to reflect the impact of 'material valuation uncertainty' on the Council's assets.

Contingencies

There are no material contingent losses including pending or potential litigation that should be accrued where:

- information presently available indicates that it is probable that an asset has been impaired or a liability had been incurred at the balance sheet date; and
- the amount of the loss can be reasonably estimated.

There are no material contingent losses that should be disclosed where, although either or both the conditions specified above are not met, there is a reasonable possibility that a loss, or a loss greater than that accrued, may have been incurred at the balance sheet date.

There are no contingent gains not already disclosed.

All material matters, including unasserted claims, that may result in litigation against the Council (and the Group) have been brought to your attention. All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to you and accounted for and disclosed in accordance with the Code and applicable law.

Laws and regulations

I confirm that I have disclosed to you all those events of which I am aware which involve known or suspected non-compliance with laws and regulations, together with the actual or contingent consequences which may arise therefrom. We have complied with all aspects of contractual agreements that would have a material effect on the accounts in the event of non-compliance.

Fraud and error

I acknowledge my responsibility as s151 Officer, for the design, implementation and maintenance of internal control to prevent and detect fraud and error.

I have disclosed to you:

- all the results of my assessment of the risk that the financial statements of the Council (and the Group) may be materially misstated as a result of fraud;
- all knowledge of fraud or suspected fraud affecting the entity involving:
 - management and those charged with governance;
 - employees who have significant roles in internal control; and
 - others where fraud could have a material effect on the financial statements.

I have disclosed to you all information in relation to any allegations of fraud, or suspected fraud, affecting the Council's (or the Group's) financial statements communicated by employees, former employees, analysts, regulators or others.

Related party transactions

I confirm that all related party relationships, transactions and balances, have been appropriately accounted for and disclosed in accordance with the requirements of the Code and applicable law.

I have disclosed to you the identity of the Council's related parties and all related party relationships and transactions of which I am aware.

Impairment review

To the best of my knowledge, there is nothing to indicate that there is a permanent reduction in the recoverable amount of the property, plant and equipment and intangible assets below their carrying value at the statement of financial position date. An impairment review is therefore not considered necessary.







APPENDIX A DRAFT MANAGEMENT REPRESENTATION LETTER

Charges on assets

All the Council's assets are free from any charges exercisable by third parties except as disclosed within the financial statements.

Future commitments

I am not aware of any plans, intentions or commitments that may materially affect the carrying value or classification of assets and liabilities or give rise to additional liabilities.

Subsequent events

I confirm all events subsequent to the date of the financial statements and for which the Code require adjustment or disclosure have been adjusted or disclosed.

Should further material events occur after the date of this letter which may necessitate revision of the figures included in the financial statements or inclusion of a note thereto, I will advise you accordingly.

Going concern

To the best of my knowledge there is nothing to indicate that the Council will not continue as a going concern in the foreseeable future. The period to which I have paid particular attention in assessing the appropriateness of the going concern basis is not less than twelve months from the date of approval of the accounts.

I have updated our going concern assessment in light of the Covid-19 pandemic. I continue to believe that the Council's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern on the grounds that current and future sources of funding or support will be more than adequate for the Council's needs. We believe that no further disclosures relating to the Council's ability to continue as a going concern need to be made in the financial statements

Annual Governance Statement

I am satisfied that the Annual Governance Statement (AGS) fairly reflects the Council's risk assurance and governance framework and I confirm that I am not aware of any significant risks that are not disclosed within the AGS

Narrative report

The disclosures within the Narrative Report fairly reflect my understanding of the Council's financial and operating performance over the period covered by the financial statements

Unadjusted misstatements

I confirm that the effects of the uncorrected misstatements are immaterial, both individually and in aggregate, to the financial statements as a whole. A list of the uncorrected misstatements is attached to this letter as an Appendix.

Ultimate parent company

I confirm that the ultimate parent company for Broxtowe Borough Council is the Ministry of Housing, Communities and Local Government.

Yours faithfully

Zulf Darr

Deputy Chief Executive and s151 Officer







APPENDIX B DRAFT AUDITOR'S REPORT

Report is subject to internal consultation and finalisation

Independent auditor's report to the members of Broxtowe Borough Council

Report on the financial statements

Opinion

We have audited the financial statements of Broxtowe Borough Council ('the Council') and its subsidiary ('the Group') for the year ended 31 March 2020, which comprise the Council and Group Comprehensive Income and Expenditure Statement(s), the Council and Group Movement in Reserves Statement(s), the Council and Group Balance Sheet(s), the Council and Group Cash Flow Statement(s), and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

In our opinion, the financial statements:

- give a true and fair view of the financial position of Broxtowe Borough Council and the Group as at 31st March 2020 and of the Council's and the Group's expenditure and income for the year then ended; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities section of our report. We are independent of the Council and Group in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter - Effect of the Covid-19 pandemic on the valuation of land and buildings

We draw attention to Note 4 of the financial statements, which describes the effects of the Covid-19 pandemic on the valuation of the Council's land and buildings and the valuation of the Council's share of Nottinghamshire Pension Fund's property assets. As disclosed in Note 4 of the financial statements, the Council's and Pension Fund's valuers included a 'material valuation uncertainty' declaration within their report as a result of the Covid-19 pandemic creating a shortage of relevant market evidence upon which to base their judgements. Our opinion is not modified in respect of this matter.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Deputy Chief Executive's use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the Deputy Chief Executive's has not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the Council's or the Group's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

Other information

The Deputy Chief Executive is responsible for the other information. The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

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APPENDIX B DRAFT AUDITOR'S REPORT

Responsibilities of the Deputy Chief Executive for the financial statements

As explained more fully in the Statement of the Deputy Chief Executive's Responsibilities, the Deputy Chief Executive is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20, and for being satisfied that they give a true and fair view. The Deputy Chief Executive is also responsible for such internal control as the Deputy Chief Executive's determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Deputy Chief Executive is required to comply with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 and prepare the financial statements on a going concern basis, unless the Council is informed of the intention for dissolution without transfer of services or function to another entity. The Deputy Chief Executive is responsible for assessing each year whether or not it is appropriate for the Council and Group to prepare its accounts on the going concern basis and disclosing, as applicable, matters related to going concern.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at <u>www.frc.org.uk/auditorsresponsibilities</u>. This description forms part of our auditor's report.

Matters on which we are required to report by exception under the Code of Audit Practice

We are required by the Code of Audit Practice to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make a recommendation under section 24 of the Local Audit and Accountability Act 2014; or
- we exercise any other special powers of the auditor under sections 28, 29 or 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

Conclusion on Broxtowe Borough Council's arrangements for securing economy, efficiency and effectiveness in the use of resources

Conclusion

On the basis of our work, having regard to the guidance on the specified criterion issued by the Comptroller and Auditor General in April 2020, we are satisfied that, in all significant respects, Broxtowe Borough Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020.

Basis for conclusion

We have undertaken our review in accordance with the Code of Audit Practice issued by the Comptroller and Auditor General, having regard to the guidance on the specified criterion issued in April 2020, as to whether the Council had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. The Comptroller and Auditor General determined this criterion as that necessary for us to consider in satisfying ourselves whether the Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020.

We planned our work in accordance with the Code of Audit Practice. Based on our risk assessment, we undertook such work as we considered necessary to form a view on whether, in all significant respects, the Council had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.



Value for Mone conclusion



APPENDIX B DRAFT AUDITOR'S REPORT

Responsibilities of the Council

The Council is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

Auditor's responsibilities for the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We are required under section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The Code of Audit Practice requires us to report to you our conclusion relating to proper arrangements. We are not required to consider, nor have we considered, whether all aspects of the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

Use of the audit report

This report is made solely to the members of Broxtowe Borough Council, as a body, in accordance with part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the members of the Council those matters we are required to state to them in an auditor's 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 members of the Council, as a body, for our audit work, for this report, or for the opinions we have formed.

Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate until we have completed the work necessary to issue our assurance statement in respect of the Council's Whole of Government Accounts consolidation pack. We are satisfied that these matters do not have a material effect on the financial statements or on our conclusion on the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources.

Mark Surridge For and on behalf of Mazars LLP 45 Church Street, Birmingham, UK, B3 2RT

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APPENDIX C INDEPENDENCE

As part of our ongoing risk assessment we monitor our relationships with you to identify any new actual or perceived threats to our independence within the regulatory or professional requirements governing us as your auditors.

We can confirm that no new threats to independence have been identified since issuing the Audit Strategy Memorandum and therefore we remain independent.





CONTACT

Mark Surridge Engagement Lead

Mobile: 07875 974 291 Email: <u>mark.surridge@mazars.co.uk</u>

Anita Pipes Manager

Email: anita.pipes@mazars.co.uk