

# **AUDIT COMMITTEE SUPPLEMENTARY AGENDA**

**18 April 2023**

The following report is attached for consideration and is submitted with the agreement of the Chairman as an urgent matter pursuant to Section 100B (4) of the Local Government Act 1972

**7A LBH PROVISIONAL AUDIT RESULTS REPORT & HAVERING PENSION FUND  
PROVISIONAL AUDIT RESULTS REPORT (Pages 1 - 98)**

Report and appendices attached.

**Zena Smith  
Democratic and Election  
Services Manager**

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## AUDIT COMMITTEE 18 04 2023

**Subject Heading:**

London Borough of Havering  
Provisional Audit results report &  
Havering Pension Fund  
Provisional Audit results report

**SLT Lead:**

Dave McNamara, Interim Section151  
Officer

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**Policy context:**

To inform the Committee of progress on  
the audit of the 2020/21 Draft statement of  
Accounts.

**Financial summary:**

There are no financial implications or risks  
arising directly from this report which is for  
information only.

### The subject matter of this report deals with the following Council Objectives

Communities making Havering	[X]
Places making Havering	[X]
Opportunities making Havering	[X]
Connections making Havering	[X]

### SUMMARY

This report advises the Committee on the work undertaken by the external auditor,  
EY

### RECOMMENDATIONS

1. To note the contents of the report.
2. To raise any issues of concern and ask specific questions of officers where required.

<b>REPORT DETAIL</b>
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**1. Introduction**

- 1.1 The Council published its draft statement of Accounts for the financial year 2020/21 in July 2021.
- 1.2 EY presented their Audit Planning Report, at the 28 April 2021 meeting of the Audit Committee that provided an overview of our audit scope and approach for the audit of the financial statements.
- 1.3 The attached reports are the provisional Audit Results Report produced by the Council's external auditor, EY on the Council's accounts and the Council's Pension Fund accounts for 2020/21.
- 1.4 The reports are attached for Audit Committee's consideration and will be supported by a presentation from EY including an update on the progress of the audit to date and the remaining work required to complete it.
- 1.5 The following areas are set out in more detail in the attached reports

**2 Executive Summary**

- 2.1 The Executive Summary of the EY reports sets out the revisions of the scope of the audit due to national and local issues. The scope has been amended to:

Address issues relating to Infrastructure Assets Accounting;  
Review the Council's Minimum revenue provision calculation;  
Varied changes in Materiality calculations; and  
Validated accuracy of information produced

- 2.2 Whilst EY have substantially completed the audit of the Council's financial statements for the year ended 31 March 2021. The following items relating to the completion of the audit were outstanding at the date of this report:
  - Work on Group statements and notes and Joint Ventures which cannot be concluded until the work of the specialist engaged by the Council has been completed

- Completion of work on property, plant and equipment valuations in terms of consideration of the impact of a small number of errors on the remaining untested population
  - Review of updated grants disclosure once the Council has provided this;
  - Completion of our procedures to assess the material accuracy of the MRP calculation;
  - Clearing remaining queries on expenditure testing;
  - Resolution of £1.6 million difference on the cashflow statement,
  - Completion of review of bank reconciliations;
- 2.3 In addition to the audit work EY will employ internal quality assurance procedures and will need to finalise going concern and VFM assessments and agree all final amendments to the financial statements before producing the final report.
- 2.4 The attached report sets out the various areas of audit focus and preliminary inclusions, and outstanding area relating to the Council's Group Financial statements and MRP calculations.
- 2.5 An area of further work relates to EY's Going Concern assessment which will need to take account to the Council's current financial position and Medium Term Financial Strategy i.e. it is not limited to the position as at 31<sup>st</sup> March 2021.
- 2.6 EY's report also identify a number of areas that they wish to bring to the attention of the Audit committee, with regard to the control environment.
- 2.7 Following the conclusion of the 2020/21 audit, senior officers will work with EY to prepare a lessons learned exercise for deployment in preparation for the 2021/22 audit and the production of the 2022/23 draft Statement of Accounts.
- 3 Pension Fund
- 3.1 The audit work in respect of the Pension Fund 2020/21 audit is substantially complete.
- 3.2 However EY are unable to issue the audit opinion on the Pension Fund's financial statements until the audit of the administering authority's (London Borough of Havering) financial statements is complete, as the Pension Fund Accounts form part of the London Borough of Havering accounts and therefore the two opinions need to be issued concurrently.
- 3.3 There are no other matters of significance to bring to the attention of the Audit Committee.

**IMPLICATIONS AND RISKS**

**Financial implications and risks:**

There are none arising directly from this report which is for noting and/or providing an opportunity for questions to be raised.

**Climate Change implications and risks:**

None arising directly from this report. Risks around this are reflected in the Corporate Risk Register and incorporated into the scope of audits where relevant.

**Legal implications and risks:**

None arising directly from this report.

**Human Resources implications and risks:**

None arising directly from this report.

**Equalities implications and risks:**

None arising directly from this report.

# Havering Pension Fund Audit results report

Year ended 31 March 2021

11 April 2023

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The EY logo consists of the letters 'EY' in a bold, white, sans-serif font. A yellow triangle is positioned above the 'Y', pointing downwards towards the letters.

Building a better  
working world



Havering Pension Fund

11 April 2023



Dear Audit Committee/ Pension Committee Members,

We are pleased to attach our Audit Results Report for the forthcoming meeting of the Audit Committee. We will update the Committee at its meeting on 18 April 2023 on further progress to that date and outline the remaining steps for the issue of our final opinion.

The audit is designed to express an opinion on the 2020/21 financial statements and address current statutory and regulatory requirements. This report contains our findings related to the areas of audit focus, our views on Havering Pension Fund's accounting policies and judgements and material internal control findings. Our audit is substantially complete, but there remain some areas to be finalised and issues to be resolved until we can fully conclude, as outlined in this report. Each year sees further enhancements to the level of audit challenge and the quality of evidence required to achieve the robust professional scepticism that society expects. We thank the management team for supporting this process.

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

We welcome the opportunity to discuss the contents of this report with you at the Committee meeting on 18 April 2023.

Yours faithfully

Debbie Hanson

Partner

For and on behalf of Ernst & Young LLP

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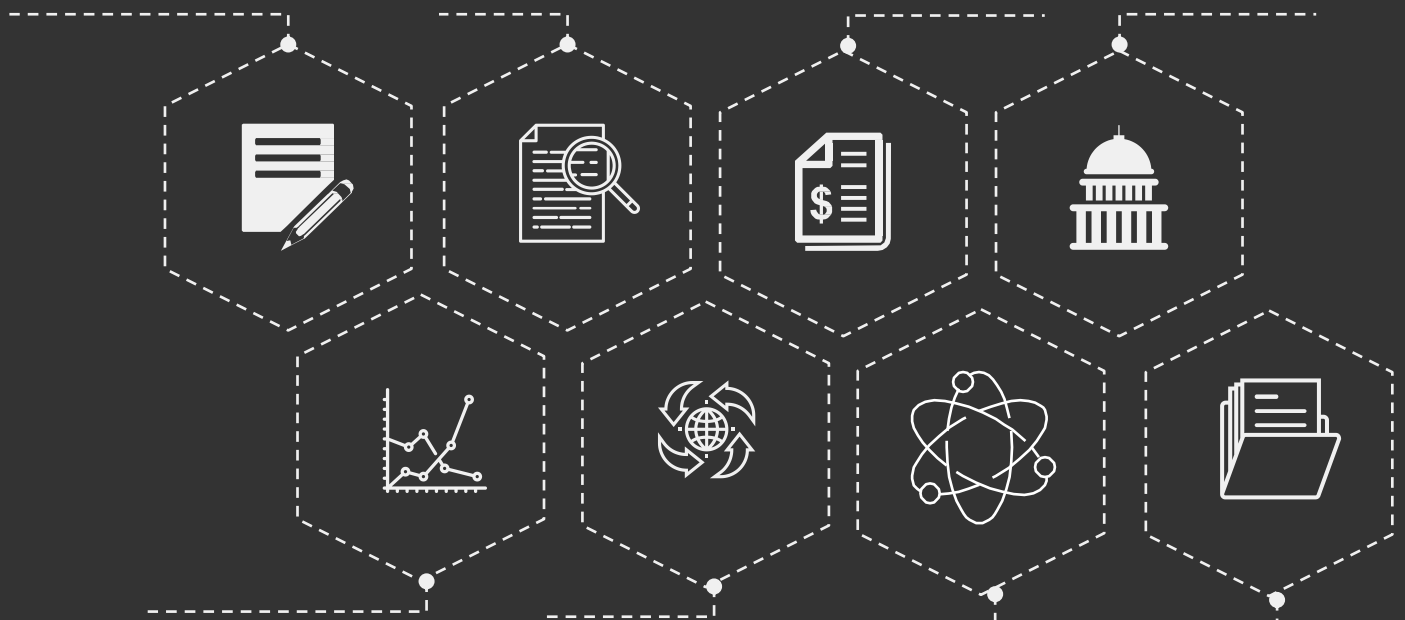
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Public Sector Audit Appointments Ltd (PSAA) issued the “Statement of responsibilities of auditors and audited bodies”. It is available from the PSAA website (<https://www.psa.co.uk/audit-quality/statement-of-responsibilities>). The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The “Terms of Appointment and further guidance (updated July 2021)” 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 Committee and management of Havering Pension Fund** in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the **Audit Committee and management of Havering Pension Fund** 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 Committee and management of Havering Pension Fund** for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.



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## Executive Summary

## Scope update

In our Audit Planning Report presented to the Audit Committee meeting on 28 April 2021, we provided you with an overview of our audit scope and approach for the audit of the Pension Fund's financial statements. We carried out our audit in accordance with this plan with the following updates.

### Update to materiality

Planning materiality, performance materiality and audit differences presented in our audit planning report were £7.28 million, £5.46 million and £0.36 million, respectively. We updated our planning materiality assessment using the draft financial statements as follows and have also reconsidered our risk assessment.

	Planning Materiality	Performance Materiality	Audit Differences
	Our planning materiality represents 1% of the Pension Fund's net assets, consistent year on year.	Performance materiality represents 75% of planning materiality and is the top of our range, consistent year on year.	We will report all uncorrected misstatements relating to the primary statements (net asset statement and fund account) greater than 5% of planning materiality.
Final	£8.74 million	£6.56 million	£0.44 million



## Executive Summary

### Status of the audit

Our audit work in respect of the Pension Fund 2020/21 audit is substantially complete. The following items relating to the completion of our audit procedures were outstanding at the date of this report:

- Completion of our going concern assessment procedures, to cover a period of at least 12 months from the date of authorisation of the financial statements;
- Review of the consistency check procedures on the Pension Fund's Annual Report with the Pension Fund's financial statements within London Borough of Havering's Statement of Accounts pack;
- Review of the other notes disclosures in the accounts;
- Clearance of queries arising from review by Partner and Manager;
- Completion of the general and conclusion procedures;
- Completion of subsequent event procedures up to the date of our audit report;
- Agreement of all final amendments to the financial statements;
- Final reviews by the Engagement manager, Partner and Quality Control Reviewer;
- Receipt of a signed accounts and a signed letter of management representation.

Note we are unable to issue the audit opinion on the Pension Fund's financial statements until the audit of the administering authority's (London Borough of Havering) financial statements is complete, as the Pension Fund Accounts form part of the London Borough of Havering accounts and therefore the two opinions need to be issued concurrently.

### Audit differences

At the time of drafting this report, we have identified audit differences between fund manager reports and direct confirmations with a net impact of £2.2 million, in relation to Level 1 and 3 investment valuations. Management have chosen not to make the amendment in the Pension Fund accounts due to the fact that the differences are not material. The Audit Committee should also confirm they are satisfied with Management's decision through approval of the Letter of Representation.

Our audit has also identified a small number of disclosure differences which management has agreed to adjust. Further differences may be identified as our remaining procedures are concluded.

We include further details in Section 4 of this report.



# Executive Summary

## Areas of audit focus

Our Audit Plan identified significant risks and areas of focus for our audit of the Pension Fund financial statements. We summarise below our latest findings. This report sets out our observations and status in relation to these areas, including our views on areas which might be conservative and areas where there is potential risk and exposure. Our consideration of these matters and others identified during the period is summarised in the "Areas of Audit Focus" section of this report.

Fraud risks	Findings & conclusions
Misstatements due to fraud or error (Management Override)	<p>We carried out procedures to address this fraud risk as set out in our Audit Plan, including identifying risks, considering controls and their effectiveness, testing journal entries and testing estimates for evidence of management bias.</p> <p>We have completed our work in this area and have no matters to bring to your attention.</p>
Misstatement due to fraud or error (Incorrect posting of investment valuation journals)	<p>We carried out procedures to address this fraud risk as set out in our Audit Plan, including a reconciliation between the fund manager reports and the custodian reports to address the risk of manipulation of asset valuations.</p> <p>We have completed our work in this area and have identified differences between fund manager reports and our direct confirmations in relation to various Level 1 and 3 investments with a net impact of £2.2 million.</p>
Significant risk	Findings & conclusions
Valuation of complex investments (including pooled property funds, pooled infrastructure and pooled private debt)	<p>We undertook additional procedures, as described more fully in Section 2 of this report, to gain assurance over the material accuracy of the year-end valuation of the Pension Fund's Level 3 complex investments, which are inherently more difficult to value.</p> <p>We have completed our work in this area. We identified differences of £1.4 million between fund manager reports and our direct confirmation in relation to various Level 3 investments as described in Section 4 of this report. These differences form part of the net difference of £2.2 million noted above.</p>
Areas of audit focus/Higher inherent risk	Findings & conclusions
Going concern disclosures	Our procedures in this area will be completed close to the opinion date. We have reviewed the proposed disclosure on going concern and will revisit this at the point the pension fund statements are authorised for issue to ensure they remain appropriate.



### Control observations

We have not identified any significant deficiencies in the design or operation of an internal control that might result in a material misstatement in your financial statements and which is unknown to you.

### Other reporting issues

We are required to give a consistency opinion on the consistency of the Pension Fund financial statements within the Pension Fund Annual Report with the Pension Fund financial statements in the Statement of Accounts of London Borough of Havering. The audit of the full annual statement of accounts of London Borough of Havering for the year ended 31 March 2021 is not yet complete, so we are yet to complete our consistency checks.

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### Independence

Please refer to Section 7 for our update on Independence.



## 02 Areas of Audit Focus



## Significant risk

### Misstatements due to fraud and error

#### What is the risk?

There is a risk that 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.

We have considered where this risk specifically manifests itself and this is in the posting of investment journals (see following page).

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#### What judgements are we focused on?

The risk of management override at Havering Pension Fund is mainly through the possibility that management could override controls and manipulate in-year financial transactions which intend to adjust the entity's reported Fund Account.

This could be done through manipulation of estimates including investment valuation, or through journals amending the values in the production of the financial statements from those provided by the custodian or fund managers.

#### What did we do?

- We enquired of management about risks of fraud and the controls put in place to address those risks.
- We gained an understanding of the oversight given by those charged with governance of management's processes over fraud.
- We tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in preparing the financial statements.
- We reviewed accounting estimates for evidence of management bias.
- We evaluated the business rationale for any significant unusual transactions.
- We utilised our data analytics capabilities to assist with our work, including journal entry testing. We assessed journal entries for evidence of management bias and evaluated for business rationale.

#### What are our conclusions?

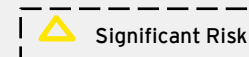
Our procedures to address this risk are complete, subject to final Partner review.

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 evidence of management bias in relation to accounting estimates.

Our journal testing did not identify any journal entries without a valid business purpose.

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







## Significant risk

### Misstatements due to fraud and error: Incorrect posting of investment valuation journals

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

The Pension Fund posts year-end manual journals in relation to the valuation of its investments as well as investment income. There is a risk that, due to fraud or error, investment journals posted into the general ledger are incorrect. This could result in a misstatement of year-end investment values and in year investment income.

#### What judgements did we focus on?

The posting of incorrect investment valuation journals and investment income journals at year-end to the Pension Funds' general ledger. The reporting of incorrect investment valuations and income would impact the performance and funding level of the Pension Fund.

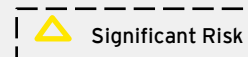
#### What did we do?

- Verified agreement of the Pension Fund's investment asset holdings as at 31 March 2021, including asset values, and investment income for 2020/21 to source reports from the Pension Fund's custodian and individual fund managers;
- Agreed the reconciliation of holdings included in the Net Assets Statement to the source reports from the Pension Fund's Custodian and Investment Fund Managers.

#### What are our conclusions?

We identified differences between investment asset valuations as reported in the Pension Fund's Net Asset Statement and direct confirmations received (independent third party valuation reports).

The differences amounts to £2.2 million which relates to Level 1 and Level 3 investments. Management have chosen not to amend the differences due to the fact they are not material. Refer to Section 4 for more details.





## Significant risk

Valuation of complex investments (Level 3 investments including pooled property funds, pooled infrastructure and pooled private debt)

### What is the risk?

The Fund's investments include complex investments, such as pooled property investments. The valuation of such investments are classified under IFRS 13 as Level 3 investments. As such the valuation of Level 3 investments are based on 'unobservable' inputs.

Judgements are taken by the Investment Managers to value those investments whose prices are not publicly available. The material nature of Investments means that any error in judgement could result in a material valuation error. Market volatility means such judgments can quickly become outdated, especially when there is a significant time period between the latest available audited information and the fund year end. Such variations could have a material impact on the financial statements.

### What judgements are we focused on?

Level 3 investment asset valuations, including the net asset values of each of the individual underlying investments funds. We also considered the potential changes in values where the date of valuation information where is not coterminous with the Pension Fund's year end date of 31 March 2021.

### What did we do and what judgements did we focus on?

For a sample of Level 3 investments:

- Reviewed the basis of valuation for property investments and other unquoted investments and assessed the appropriateness of valuation methods used;
- Compared the investment value included in the Pension Fund's financial statements to direct confirmations from the Fund Managers;
- Obtained copies of the ISAE3402 reports over internal control for any control exceptions raised in relation to the valuation of investments;
- Where available, reviewed the latest audited financial statements for the relevant fund managers and ensured there are no matters arising that highlight material differences in the reported funds valuation within the financial statements;
- Performed analytical procedures and checking the valuation output for reasonableness against our own expectations;
- Reviewed investment valuation disclosures to verify that significant judgements surrounding the valuation of Level 3 investments have been appropriately made in the Pension Fund's financial statements.

### What are our conclusions?

We identified audit differences in the valuation of Level 3 investment assets. In total, the differences understate the Pension Fund's overall investment asset value by £1.4 million. These differences were identified based on direct confirmations received for the Level 3 investments.

Management have chosen not to amend the differences due to the fact they are not material. Refer to Section 4 for more details.

We did not identify any weaknesses in fund manager controls related to investment asset valuation reporting of Level 3 assets.

The Pension Fund's financial statement disclosures of significant judgements surrounding the valuation of Level 3 investments were appropriate.





## Areas of Audit Focus

What is the risk/area of focus?	What did we do?
<p><u>Going concern disclosure</u></p> <p>There is a presumption that the Fund will continue as a going concern for the foreseeable future. However, the Fund is still required to carry out a going concern assessment that is proportionate to the risks it faces.</p> <p>The unpredictability of the current economic environment and also the volatility of the capital markets due to the ongoing impact of Covid as well as the Ukraine-Russia conflict give rise to a risk that the Pension Fund may not appropriately disclose the impact of these issues on their going concern assessment. The disclosure should be underpinned by management's assessment based on the Pension Fund's actual year end financial position and projected performance and cashflows for the going concern period of 12 months from the auditor's report date.</p>	<p>We will complete our planned procedures related to this area of focus once we are close to issuing our audit report.</p> <p>In terms of the work completed to date, we have:</p> <ul style="list-style-type: none"><li>• Obtained management's going concern assessment and reviewed for any evidence of bias and consistency with the accounts;</li><li>• Challenged management's identification of events or conditions impacting going concern;</li><li>• Reviewed the cashflow forecasts prepared by the Pension Fund;</li><li>• Assessed the adequacy of going concern disclosures in the Pension Fund's financial statements.</li></ul> <p>Our review of the proposed disclosure on going concern has not identified any issues. However, this disclosures will need to be revisited at the point the pension fund statements are authorised for issue to ensure that these remain appropriate to the Pension Fund's circumstances for the foreseeable future (the next twelve months).</p>



# 03 Audit Report



## Draft audit report

### Our draft opinion on the financial statements

#### INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF LONDON BOROUGH OF HAVERING ON THE PENSION FUND'S FINANCIAL STATEMENTS - DRAFT

##### Opinion

We have audited the pension fund financial statements for the year ended 31 March 2021 under the Local Audit and Accountability Act 2014. The pension fund financial statements comprise the Fund Account, the Net Assets Statement and the related notes 1 to 26. 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 2020/21.

In our opinion the pension fund financial statements:

- give a true and fair view of the financial transactions of the pension fund during the year ended 31 March 2021 and the amount and disposition of the fund's assets and liabilities as at 31 March 2021; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

##### 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 for the audit of the financial statements section of our report below. We are independent of the pension fund 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 the Comptroller and Auditor General's (C&AG) AGN01, 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.

##### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Chief Financial Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the authority's ability to continue as a going concern for a period of twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Chief Financial Officer with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the authority's ability to continue as a going concern.

##### Other information

The other information comprises the information included in the 2020/21 Pension Fund Accounts, other than the financial statements and our auditor's report thereon. The Chief Financial Officer is responsible for the other information contained within the Statement of Accounts 2020/21.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

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 course of 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 themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.



## Draft audit report

### Our opinion on the financial statements

#### Matters on which we report by exception

We 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 written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

#### Responsibility of the Chief Financial Officer

As explained more fully in the Statement of the Chief Financial Officer's Responsibilities set out on page xx, the Chief Financial Officer is responsible for the preparation of the Authority's Statement of Accounts, which includes the pension fund 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 2020/21, and for being satisfied that they give a true and fair view and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Chief Finance Officer is responsible for assessing the Pension Fund's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Pension Fund either intends to cease operations, or have no realistic alternative but to do so.

#### 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.

Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the entity and management.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Pension Fund and determined that the most significant are the Local Government Pension Scheme Regulations 2013 (as amended), and The Public Service Pensions Act 2013.

We understood how Havering Pension Fund is complying with those frameworks by understanding the incentive, opportunities and motives for non-compliance, including inquiring of management/head of internal audit/those charged with governance and obtaining and reading documentation relating to the procedures in place to identify, evaluate and comply with laws and regulations, and whether they are aware of instances of non-compliance. We corroborated this through our reading of the Pension Board minutes, through enquiry of employees to confirm Pension policies, and through the inspection of employee handbooks and other information. Based on this understanding we designed our audit procedures to identify non-compliance with such laws and regulations.



## Draft audit report

### Our opinion on the financial statements

Our procedures had a focus on compliance with the accounting framework through obtaining sufficient audit evidence in line with the level of risk identified and with relevant legislation.

We assessed the susceptibility of the Pension Fund's financial statements to material misstatement, including how fraud might occur by understanding the potential incentives and opportunities for management to manipulate the financial statements, and performed procedures to understand the areas in which this would most likely arise. Based on our risk assessment procedures we identified the manipulation of journal entries of the investment asset valuations and investment income to be our fraud risk.

To address our fraud risk we tested the consistency of the investment asset valuation from the independent sources of the custodian and the fund managers to the financial statements and investment income through to third party evidence.

In common with all audits under ISAs (UK), we are also required to perform specific procedures to respond to the risk of management override. In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments; assessed whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluated the business rationale of any identified significant transactions that were unusual or outside the normal course of business.

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

#### Use of our report

This report is made solely to the members of London Borough of Havering, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and for no other purpose, as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the London Borough of Havering and the London Borough of Havering members as a body, for our audit work, for this report, or for the opinions we have formed.



# 04 Audit Differences







## Audit Differences

In the normal course of any audit, we identify misstatements between amounts we believe should be recorded in the financial statements and the disclosures and amounts actually recorded. These differences are classified as “known” or “judgemental”. Known differences represent items that can be accurately quantified and relate to a definite set of facts or circumstances. Judgemental differences generally involve estimation and relate to facts or circumstances that are uncertain or open to interpretation.

### Summary of unadjusted and adjusted differences

At the time of this report, we have not identified any corrected differences to bring to your attention.

We highlight misstatements greater than £0.44 million which have been identified during the course of our audit.

#### Unadjusted Audit Differences

Valuation of Level 3 investments:

There are uncorrected audit differences arising from procedures performed on the valuation testing of Level 3 investments which in total would increase the value of the Pension Fund assets by £1.4 million. These differences were identified based on direct confirmations received for the level 3 investments.

Valuation of Level 1 investments:

There are also uncorrected audit differences arising from procedures performed on the valuation testing of Level 1 investments which in total would decrease the value of the Pension fund assets by £3.7 million. These differences were identified based on direct confirmations received for the Level 1 investments. We request that these uncorrected misstatements be corrected or a rationale as to why they are not corrected be considered and approved by the Audit Committee and provided within the Letter of Representation.

#### Adjusted Differences

Our audit also identified a limited number of minor disclosure misstatements mostly relating to the narratives of the Annual Report which our team have highlighted to management for amendment. These have been corrected during the course of the audit and relate to disclosure and presentational matters in the Statement of Accounts.

Our audit is not yet complete and further differences may be identified during the completion of the outstanding procedures.



# 05 Other reporting issues

## Other reporting issues

### Consistency of other information published with the financial statements

We must give an opinion on the consistency of the Pension Fund financial statements within the Pension Fund Annual Report with the Pension Fund financial statements in the Statement of Accounts of London Borough of Havering. The audit of the full annual statement of accounts of London Borough of Havering for the year ended 31 March 2021 is not yet complete, so we are yet to complete our consistency checks. We will update the Committee on our findings from completion of these procedures at the next Committee meeting.

### Other powers and duties

We have a duty under the Local Audit and Accountability Act 2014 to consider whether to report on any matter that comes to our attention in the course of the audit, either for the Authority to consider it or to bring it to the attention of the public (i.e. "a report in the public interest"). We did not identify any issues which required us to issue a report in the public interest.

We also have a duty to make written recommendations to the Authority, copied to the Secretary of State, and take action in accordance with our responsibilities under the Local Audit and Accountability Act 2014. We have had no reason to exercise these duties.

### Other matters

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Pension Fund's financial reporting process. We have no matters to report.



**06**

# Assessment of Control Environment



# Assessment of Control Environment

## Financial controls

### Our responsibilities

It is the responsibility of the Pension Fund to develop and implement systems of internal financial control and to put in place proper arrangements to monitor their adequacy and effectiveness in practice. Our responsibility as your auditor is to consider whether the Pension Fund has put adequate arrangements in place to satisfy itself that the systems of internal financial control are both adequate and effective in practice.

As part of our audit of the financial statements, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. As we have adopted a fully substantive approach, we have therefore not tested the operation of controls.

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.

### Findings

We have not identified any significant deficiencies in internal control.



07

Independence

## Relationships, services and related threats and safeguards

The FRC Ethical Standard requires that we provide details of all relationships between Ernst & Young (EY) and the Pension Fund, and its members and senior management and its affiliates, including all services provided by us and our network to the Pension Fund, its members and senior management and its affiliates, and other services provided to other known connected parties that we consider may reasonably be thought to bear on the our integrity or objectivity, including those that could compromise independence and the related safeguards that are in place and why they address the threats.

There are no relationships from 1 April 2021 to the date of this report, which we consider may reasonably be thought to bear on our independence and objectivity.

### Services provided by Ernst & Young

The next page includes a summary of the fees in relation to the year ended 31 March 2021 in line with the disclosures set out in FRC Ethical Standard and in statute. Full details of the services that we have provided are shown below.

At the date of this report, there are no future services which have been contracted and no written proposal to provide non-audit services has been submitted. We confirm that we have not undertaken non-audit work.

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## Other communications

### EY Transparency Report 2022

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 July 2022:

[EY UK 2022 Transparency Report | EY UK](#)

## Relationships, services and related threats and safeguard

### Services provided by Ernst & Young

As part of our reporting on our independence, we set out below a summary of the fees in relation to the year ended 31 March 2021.

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

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.

On completion of the audit we will finalise our fees and provide supporting details to the Chief Financial Officer. Any fee increases in relation to Code work also need to be approved by PSAA.

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	Proposed fee 2020/21	Final fee 2019/20
	£'s	£'s
Scale fee - Code work	16,170	16,170
Changes in work required to address professional and regulatory requirements and scope associated with risk	38,842 (b)	14,300 (a)
Total variation to the scale fee		
Additional fee in respect of work on admitted body - London Borough of Havering - non code work	5,000 (c)	4,000 (c)
Triennial membership data testing	N/A	8,000 (d)
Additional level 3 investment valuation procedures	3,000 - 5,000 (e)	N/A
Additional going concern procedures	2,000 - 3,000 (f)	N/A
Analytics charge	2,500 (g)	N/A
Other additional fees	TBC (h)	N/A
Total fee	TBC	42,470

*All fees exclude VAT*

See next slide for notes on the fees per the above table



## Relationships, services and related threats and safeguard

### Notes on fees

- (a) For 2019/20, PSAA approved a fee variation of £14,300 in addition to the scale fee of £16,170. The additional fees represents the cost incurred as a result of additional work required in response to increased FRC challenge and covid-19 impact on completion and investment valuations.
- (b) We do not believe that the current scale fee reflects the changes in the audit market and increases in regulation since the PSAA tender exercise for this audit. For 2020/21, as in the previous year, we have therefore proposed increases to the scale fee to take into account a number of risk factors including: Procedures to address the risk profile of the Pension Fund; Additional work to address increase in Regulatory Standards; Client readiness and IT support for Data Analytics. The proposed scale fee increase is subject to determination by PSAA.
- (c) Additional fee to take into account the work required to respond to IAS19 assurance requests from admitted body - London Borough of Havering. The Pension Fund can recharge this fee to the relevant admitted bodies. This is not subject to PSAA approval.
- (d) Fee relates to the triennial valuation 2019 - membership data testing
- (e) Additional audit procedures performed relating to the valuation of Investments, particularly the Level 3 investments where we have a significant risk.
- (f) Additional procedures relating to the going concern, which we identified as an area of focus for 2020/21.
- (g) Due to system change during the middle of the year, two sets of data analysers were required to perform the audit. This also includes the audit team review of the completeness of the data migration from old to new system.
- (h) Other fee variations may arise up to signing of the pension fund statements since audit is still ongoing at the time of writing this report.



# 08 Appendices

## Audit approach update

We summarise below our approach to the audit of the net assets statements and any changes to this approach from the prior year audit.




Our audit procedures are designed to be responsive to our assessed risk of material misstatement at the relevant assertion level. Assertions relevant to the net assets statement include:

- **Existence:** An asset, liability and equity interest exists at a given date
- **Rights and obligations:** An asset, liability and equity interest pertains to the entity at a given date
- **Completeness:** There are no unrecorded assets, liabilities, and equity interests, transactions or events, or undisclosed items
- **Valuation:** An asset, liability and equity interest is recorded at an appropriate amount and any resulting valuation or allocation adjustments are appropriately recorded
- **Presentation and disclosure:** Assets, liabilities and equity interests are appropriately aggregated or disaggregated, and classified, described and disclosed in accordance with the applicable financial reporting framework. Disclosures are relevant and understandable in the context of the applicable financial reporting framework

There are no changes to our audit approach to the Pension Fund's net assets statement when compared to the prior year audit.

# Required communications with the Audit Committee

There are certain communications that we must provide to the Audit Committees of UK clients. We have detailed these here together with a reference of when and where they were covered:

			 Our Reporting to you
Required communications	 What is reported?	 When and where	
Terms of engagement	Confirmation by the Audit Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the 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.	Audit planning report - April 2021	
Planning and audit approach	Communication of the planned scope and timing of the audit, any limitations and the significant risks identified.	Audit planning report - April 2021	
Significant findings from the audit	<ul style="list-style-type: none"> <li>• Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>• Significant difficulties, if any, encountered during the audit</li> <li>• Significant matters, if any, arising from the audit that were discussed with management</li> <li>• Written representations that we are seeking</li> <li>• Expected modifications to the audit report</li> <li>• Other matters if any, significant to the oversight of the financial reporting process</li> </ul>	This Audit results report	

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## Appendix B

		Our Reporting to you
Required communications	What is reported?	When and where
Going concern	<p>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</p> <ul style="list-style-type: none"> <li>• Whether the events or conditions constitute a material uncertainty</li> <li>• Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>• The adequacy of related disclosures in the financial statements</li> </ul>	This Audit Results Report
Misstatements	<ul style="list-style-type: none"> <li>• Uncorrected misstatements and their effect on our audit opinion</li> <li>• The effect of uncorrected misstatements related to prior periods</li> <li>• A request that any uncorrected misstatement be corrected</li> <li>• Material misstatements corrected by management</li> </ul>	This Audit Results Report
Subsequent events	<ul style="list-style-type: none"> <li>• Enquiry of the Audit Committee where appropriate regarding whether any subsequent events have occurred that might affect the financial statements.</li> </ul>	This Audit Results Report
Fraud	<ul style="list-style-type: none"> <li>• Enquiries of the Audit Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the Authority</li> <li>• Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</li> <li>• Unless all of those charged with governance are involved in managing the Authority, any identified or suspected fraud involving:               <ol style="list-style-type: none"> <li>a. Management;</li> <li>b. Employees who have significant roles in internal control; or</li> <li>c. Others where the fraud results in a material misstatement in the financial statements.</li> </ol> </li> <li>• The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</li> <li>• Any other matters related to fraud, relevant to Audit Committee responsibility.</li> </ul>	This Audit Results Report




## Appendix B

		Our Reporting to you
Required communications	What is reported?	When and where
Related parties	<p>Significant matters arising during the audit in connection with the Authority's related parties including, when applicable:</p> <ul style="list-style-type: none"> <li>• Non-disclosure by management</li> <li>• Inappropriate authorisation and approval of transactions</li> <li>• Disagreement over disclosures</li> <li>• Non-compliance with laws and regulations</li> <li>• Difficulty in identifying the party that ultimately controls the Authority</li> </ul>	This Audit Results Report
Independence	<p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence.</p> <p>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</p> <ul style="list-style-type: none"> <li>• The principal threats</li> <li>• Safeguards adopted and their effectiveness</li> <li>• An overall assessment of threats and safeguards</li> <li>• Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul> <p>Communications whenever significant judgments are made about threats to objectivity and independence and the appropriateness of safeguards put in place.</p> <p>For public interest entities and listed companies, communication of minimum requirements as detailed in the FRC Revised Ethical Standard 2019:</p> <ul style="list-style-type: none"> <li>• Relationships between EY, the company and senior management, its affiliates and its connected parties</li> <li>• Services provided by EY that may reasonably bear on the auditors' objectivity and independence</li> <li>• Related safeguards</li> <li>• Fees charged by EY analysed into appropriate categories such as statutory audit fees, tax advisory fees, other non-audit service fees</li> <li>• A statement of compliance with the Ethical Standard, including any non-EY firms or external experts used in the audit</li> </ul>	<p>Audit Planning Report - April 2021 and This Audit Results Report</p>

## Appendix B

		Our Reporting to you
Required communications	What is reported?	When and where
	<ul style="list-style-type: none"> <li>• Details of any inconsistencies between the Ethical Standard and Group's policy for the provision of non-audit services, and any apparent breach of that policy</li> <li>• Details of any contingent fee arrangements for non-audit services</li> <li>• Where EY has determined it is appropriate to apply more restrictive rules than permitted under the Ethical Standard</li> <li>• The audit committee should also be provided an opportunity to discuss matters affecting auditor independence</li> </ul>	
External confirmations	<ul style="list-style-type: none"> <li>• Management's refusal for us to request confirmations</li> <li>• Inability to obtain relevant and reliable audit evidence from other procedures.</li> </ul>	We have received all requested confirmations
Consideration of laws and regulations	<ul style="list-style-type: none"> <li>• Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</li> <li>• Enquiry of the audit committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the audit committee may be aware of</li> </ul>	We have asked management and those charged with governance. We have not identified any material instances or non-compliance with laws and regulations
Significant deficiencies in internal controls identified during the audit	<ul style="list-style-type: none"> <li>• Significant deficiencies in internal controls identified during the audit.</li> </ul>	This Audit Results Report

## Appendix B

		Our Reporting to you
Required communications	 What is reported?	  When and where
Written representations we are requesting from management and/or those charged with governance	<ul style="list-style-type: none"> <li>Written representations we are requesting from management and/or those charged with governance</li> </ul>	This Audit Results Report
Material inconsistencies or misstatements of fact identified in other information which management has refused to revise	<ul style="list-style-type: none"> <li>Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</li> </ul>	This Audit Results Report
Auditors report	<ul style="list-style-type: none"> <li>Any circumstances identified that affect the form and content of our auditor's report</li> </ul>	This Audit Results Report
Fee Reporting	<ul style="list-style-type: none"> <li>Breakdown of fee information when the audit planning report is agreed</li> <li>Breakdown of fee information at the completion of the audit</li> <li>Any non-audit work</li> </ul>	Audit Planning Report April 2021 and This Audit Results Report

2020  
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# Management representation letter - Draft

Havering Pension Fund anticipated draft, based on the current position of the audit. Further representations may be required

### Management Representation Letter

Date

Debbie Hanson  
Associate Partner  
Ernst & Young LLP  
400 Capability Green  
Luton  
LU1 3LU

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This letter of representations is provided in connection with your audit of the financial statements of Bedfordshire Pension Fund (“the Fund”) for the year ended 31 March 2021. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the financial statements give a true and fair view of the financial transactions of the Fund during the period from 1 April 2020 to 31 March 2021 and of the amount and disposition of the Fund’s assets and liabilities as at 31 March 2021, other than liabilities to pay pensions and benefits after the end of the period, have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

We understand that the purpose of your audit of the Fund’s financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing (UK), which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

#### A. Financial statements and financial records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
2. We confirm that the Fund is a Registered Pension Scheme. We are not aware of any reason why the tax status of the scheme should change.
3. We acknowledge, as members of management of the Fund, our responsibility for the fair presentation of the financial statements. We believe the financial statements referred to above give a true and fair view of the financial position and the financial performance of the Fund in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, and are free of material misstatements, including omissions. We have approved the financial statements.

# Management representation letter

4. The significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.
5. As members of management of the Fund, we believe that the Fund has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/2021 that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls.
6. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in aggregate, to the financial statements as a whole. We have not corrected these differences identified and brought to the our attention by the auditor because (reason to be added by management).

## B. Non-compliance with laws and regulations including fraud

- Page 40
1. We acknowledge that we are responsible for determining that the Fund's activities are conducted in accordance with laws and regulations and that we are responsible for identifying and addressing any non-compliance with applicable laws and regulations, including fraud.
  2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
  3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
  4. We have not made any reports to The Pensions Regulator, nor are we aware of any such reports having been made by any of our advisors.
  5. There have been no other communications with The Pensions Regulator or other regulatory bodies during the Fund year or subsequently concerning matters of noncompliance with any legal duty.
  6. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Fund (regardless of the source or form and including without limitation, any allegations by "whistleblowers"), including non-compliance matters:
    - ▶ Involving financial improprieties
    - ▶ Related to laws or regulations that have a direct effect on the determination of material amounts and disclosures in the Fund's financial statements
    - ▶ Related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Fund, its ability to continue, or to avoid material penalties
    - ▶ Involving management, or employees who have significant roles in internal control, or others
    - ▶ In relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

## C. Information provided and completeness of information and transactions

1. We have provided you with:

Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters.

- ▶ Additional information that you have requested from us for the purpose of the audit.
- ▶ Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.



# Management representation letter

2. You have been informed of all changes to the Fund rules.

3. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the financial statements, including those related to the COVID-19 pandemic and including those related to the conflict and related sanctions in Ukraine, Russia and/or Belarus

4. We have made available to you all minutes of the meetings of Audit Committee and Pension Fund Advisory Committee (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the period to the most recent meeting on the following [date].

5. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Fund's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the period end. These transactions have been appropriately accounted for and disclosed in the financial statements.

6. We have disclosed to you, and the Fund has complied with, all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.

7. No transactions have been made which are not in the interests of the Fund members or the Fund during the fund year or subsequently.

8. We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/2021.

9. We have disclosed to you any unauthorized access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants), to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material impact to the financial statements, in each case or in the aggregate.

## D. Liabilities and contingencies

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the financial statements.

2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.

## E. Going concern

1. Note 2 to the financial statements discloses all the matters of which we are aware that are relevant to the Fund's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

## F. Subsequent events

1. Other than the events described in Note 6 to the financial statements, there have been no events, including events related to the COVID-19 pandemic, subsequent to period end which require adjustment of or disclosure in the financial statements or notes thereto and including events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus, subsequent to period end which require adjustment of or disclosure in the consolidated and Council financial statements or notes thereto.

## Management representation letter

### G. Other information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the Narrative Report and Annual Governance Statement within the Statement of Accounts, and the Pension Fund Annual Report.
2. We confirm that the content contained within the other information is consistent with the financial statements.

### H. Independence

1. We confirm that, under section 27 of the Pensions Act 1995, no members of the management of the Fund of the Scheme is connected with, or is an associate of, Ernst & Young LLP which would render Ernst & Young LLP ineligible to act as auditor to the Scheme.

### I. Derivative Financial Instruments

1. We confirm that the Fund has made no direct investment in derivative financial instruments.

### J. Pooling investments, including the use of collective investment vehicles and shared services

1. We confirm that all investments in pooling arrangements, including the use of collective investment vehicles and shared services, meet the criteria set out in the November 2015 investment reform and criteria guidance and that the requirements of the LGPS Management and Investment of Funds Regulations 2016 in respect of these investments has been followed.

### K. Actuarial valuation

1. The latest report of the actuary Hymans Robertson as at 31 March 2019 has been provided to you. To the best of our knowledge and belief we confirm that the information supplied by us to the actuary was true and that no significant information was omitted which may have a bearing on their report.

### L. Use of the work of a specialist

1. We agree with the findings of the specialists that we have engaged to value the fund's assets and liabilities and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.

## Management representation letter

### M. Estimates

1. We confirm that the significant judgments made in valuation of the Fund's Level 3 investment asset values and the actuarial present value of future pension payment estimates ("the accounting estimates") have taken into account all relevant information and the effects of the COVID-19 pandemic and events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus of which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the accounting estimates.
3. We confirm that the significant assumptions used in making the accounting estimates appropriately reflect our intent and ability to carry out the specific courses of action on behalf of the entity.
4. We confirm that the disclosures made in the financial statements with respect to the accounting estimate(s), including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
5. We confirm that appropriate specialized skills or expertise has been applied in making the accounting estimates.
6. We confirm that no adjustments are required to the accounting estimates and disclosures in the financial statements, including due to the COVID-19 pandemic and events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus.

### N. Actuarial Present Value of Promised Retirement Benefits Estimate

1. We confirm that the significant judgements made in making the actuarial present value of promised retirement benefit estimate have taken into account all relevant information and the effects of the COVID-19 pandemic of which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the actuarial present value of promised retirement benefit estimate.
3. We confirm that the significant assumptions used in making the actuarial present value of promised retirement benefit estimate appropriately reflect our intent and ability to carry out the specific courses of action on behalf of the entity.
4. We confirm that the disclosures made in the financial statements with respect to the accounting estimate, including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
5. We confirm that appropriate specialized skills or expertise has been applied in making the actuarial present value of promised retirement benefit estimate.
6. We confirm that no adjustments are required to the accounting estimate(s) and disclosures in the financial statements, including due to the COVID-19 pandemic and events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus.

Yours faithfully,

\_\_\_\_\_  
Chief Financial Officer

\_\_\_\_\_  
(Chairman of Audit Committee)

## Management representation letter

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Uncorrected misstatements 31 March 2021 (Currency'000)	Effect on the current period:		Net assets (Decrease)/Increase			
	OCI Debit/(Credit)	Comprehensiv e Income and Expenditure Statement Debit/(Credit)	Assets current Debit/ (Credit)	Assets non current Debit/ (Credit)	Liabilities current Debit/ (Credit)	Liabilities non- current Debit/ (Credit)
Errors (Factual misstatements)						
Level 3 Investment valuations understatement						
▶ Investments (Net asset statement)				1,424,000		
▶ Change in value of investments (Fund account)		(1,424,000)				
Level 1 Investment valuations overstatement						
▶ Investments (Net asset statement)				(3,706,000)		
▶ Change in value of investments (Fund account)		3,706,000				

About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

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ED None

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# London Borough of Havering Audit results report

Year ended 31 March 2021

11 April 2023

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The EY logo consists of the letters 'EY' in a bold, white, sans-serif font. A yellow triangle is positioned above the 'Y', pointing downwards towards the letters.

Building a better  
working world

11 April 2023



Members of the Audit Committee  
London Borough of Havering  
Town Hall  
Main Road  
Romford RM1 3BB

Dear Audit Committee Members

We are pleased to attach our Provisional Audit Results Report for the forthcoming meeting of the Audit Committee. This report summarises our current audit conclusions in relation to the audit of the London Borough of Havering (the Council) for 2020/21. We will update the Audit Committee at its meeting scheduled for 18 April 2023 on any further progress to that date and outline the remaining steps to the issue of our final opinion.

The audit is designed to express an opinion on the 2020/21 financial statements and address current statutory and regulatory requirements. This report contains our findings related to the areas of audit emphasis, our views on the Council's accounting policies and judgements and material internal control findings. Each year sees further enhancements to the level of audit challenge and the quality of evidence required to achieve the robust professional scepticism that society expects. We thank the management team for supporting this process. We have also included an update on our work on value for money arrangements in this report.

Delays in the provision of responses to audit queries in a number of areas, and the consequential impact this has had on our resourcing of the audit means that the audit is ongoing. In addition, the national issue on accounting for infrastructure assets identified in March 2022 also resulted in significant delays in the completion of the audit. More information is included within the detail of this report. Our intention is to issue a final Audit Results Report once all outstanding procedures have been concluded.

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

We welcome the opportunity to discuss the contents of this report with you at the Audit Committee meeting on 18 April 2023.

Yours faithfully

Debbie Hanson

Partner

For and on behalf of Ernst & Young LLP

Encl

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Public Sector Audit Appointments Ltd (PSAA) issued the “Statement of responsibilities of auditors and audited bodies”. It is available from the PSAA website (<https://www.psa.co.uk/audit-quality/statement-of-responsibilities/>). The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The “Terms of Appointment and further guidance (updated July 2021)” 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 Committee and management of London Borough of Havering in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit Committee, and management of London Borough of Havering 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 Committee and management of London Borough of Havering for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.



01

## Executive Summary



## Executive Summary

### Scope update

In our Audit Planning Report, presented at the 28 April 2021 meeting of the Audit Committee, we provided you with an overview of our audit scope and approach for the audit of the financial statements. We carried out our audit in accordance with this plan, with the following exceptions:

#### *Changes to risk:*

##### Infrastructure assets accounting:

In March 2022, an issue was raised with the National Audit Office's Local Government technical network in relation to accounting for infrastructure assets. Under the CIPFA Code, these assets are held at depreciated historic cost. It has been identified that, whilst local authorities add expenditure incurred on replacing or enhancing such assets, most do not appear to be reviewing the Code requirement to establish whether this spend is a replacement of an asset, or a recognised component, and therefore, are not derecognising the old component. As a consequence, gross cost and gross accumulated depreciation are continually increasing, and the balance sheet may be misstated where the expenditure is a replacement for an asset/component not fully depreciated.

CIPFA issued an adaptation to the Code of Practice on Local Authority Accounting to allow reporting on a net basis for infrastructure assets and in December 2022 DLUHC issued a Statutory Instrument (The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2022) which allows for the infrastructure assets opening balance to be brought forward without amendment and determines the carrying amount to be derecognised in respect of replaced components to be nil.

The Council will take the option to apply the Code adaptation and statutory instrument to their 2020/21 financial statements. They will amend the presentation of infrastructure assets, included the required disclosure note and updated the accounting policy as required by the statutory instrument.

Our work to review this restatement and confirm the material accuracy of the in year depreciation has been completed and we have not identified any issues.

##### Minimum revenue provision calculation:

Under statute the Council is required to calculate and set aside a minimum revenue provision (MRP) for the repayment of debt. The Council's MRP is not material, however in light of the significant levels of borrowing associated with the Council's regeneration programme we have identified a risk that the provision may not be appropriately calculated, resulting in a risk of material understatement. Our work on this is currently ongoing.

##### Changes in materiality

We updated our planning materiality assessment using the draft financial statements and have also reconsidered our risk assessment. Based on our materiality measure of 1.8% of gross expenditure, we have updated our overall materiality misstatement to £10.4 million (Audit Planning Report – £10.3 million). This results in updated performance materiality, at 75% of overall materiality, of £7.8 million, and an updated threshold for reporting misstatements of £0.52 million.

##### Information Produced by the Entity (IPE):

We identified an increased risk around the completeness, accuracy, and appropriateness of information produced by the entity due to the inability of the audit team to verify original documents or re-run reports on-site from the Council's systems. We undertook the following to address this risk:

- Used the screen sharing function of Microsoft Teams to evidence re-running of reports used to generate the IPE we audited; and
- Agree IPE to scanned documents or other system screenshots.



## Executive Summary

### Status of the audit

We have substantially completed our audit of the Council's financial statements for the year ended 31 March 2021. The following items relating to the completion of our audit procedures were outstanding at the date of this report:

- Work on Group statements and notes and Joint Ventures which cannot be concluded until the work of the specialist engaged by the Council has been completed);
- Completion of work on property, plant and equipment valuations in terms of consideration of the impact of a small number of errors on the remaining untested population;
- Review of updated grants disclosure once the Council has provided this;
- Completion of our procedures to assess the material accuracy of the MRP calculation;
- Clearing remaining queries on expenditure testing;
- Resolution of £1.6 million difference on the cashflow statement,
- Completion of review of bank reconciliations;
- Completion of our going concern assessment procedures which will be completed closer to the opinion date;
- Completion of final Partner and Manager review of a number of areas;
- Completion of the general and conclusion procedures;
- Completion of subsequent event procedures up to the date of the audit report;
- Agreement of all final amendments to the financial statements;
- Final reviews by the Engagement manager, Partner and Quality Control Reviewer;
- Receipt of a signed accounts and a signed letter of management representation; and
- Completion of procedures required for whole of government accounts.

Given that the audit process is still ongoing, we will continue to challenge the remaining evidence provided and the final disclosures in the Narrative Report and Accounts which could influence our final audit opinion which is included in Section 4 of this report.



### Auditor responsibilities under the Code of Audit Practice 2020

Under the Code of Audit Practice 2020, we are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. The 2020 Code requires the auditor to design their work to provide them with sufficient assurance to enable them to report to the Council a commentary against specified reporting criteria (see below) on the arrangements the Council has in place to secure value for money through economic, efficient and effective use of its resources for the relevant period.

The specified reporting criteria are:

- **Financial sustainability**  
How the Council plans and manages its resources to ensure it can continue to deliver its services;
- **Governance**  
How the Council ensures that it makes informed decisions and properly manages its risks; and
- **Improving economy, efficiency and effectiveness:**  
How the Council uses information about its costs and performance to improve the way it manages and delivers its services.



## Executive Summary

### Status of the audit – Value for Money

In the Audit Plan, we reported that we had yet to commence our value for money (VFM) risk assessment.

We have now completed our planning, taking into consideration the findings from the 2019/20 value for money work, our discussion with management and our knowledge of sector-wide issues that may affect the Council. We had identified one risk of significant weakness in respect of the Council's governance arrangements for delivering housing regeneration schemes through three joint venture ('JV') partners.

We have completed our work to address this risk and have concluded that there is no significant weakness in arrangements. We will report on our findings in this area in more detail in our VFM commentary in our Auditor's Annual Report which will be issued after, or alongside, the issue of the audit report.

### Audit differences

At the time of writing, we have identified two projected misstatements relating to expenditure (£3.8 million) and creditors (£0.65 million) and one reclassification adjustment between sundry debtors and creditors (net £0.65 million). Overall, the adjustments are not material to the financial statements and remains uncorrected. Further details are provided in Section 4.

Management have chosen not to make the amendment in the accounts due to the fact that the differences are not material. The Audit Committee should also confirm they are satisfied with Management's decision through approval of the Letter of Representation.

Further differences may be identified as our remaining procedures are concluded. An update will be provided to the Audit Committee on any new differences identified subsequent to the release of this report.

We include further details in Section 4 of this report.

### Other reporting issues

We have reviewed the information presented in the Annual Governance Statement for consistency with our knowledge of the Council. We have no matters to report as a result of this work.

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of the financial statements audit.

We have no other matters to report.



## Executive Summary

### Areas of audit focus

We identified a number of key areas of focus for our audit of the financial report of London Borough of Havering. This report sets out our observations and status in relation to these areas, including our views on areas which might be conservative and areas where there is potential risk and exposure. Our consideration of these matters and others identified during the period is summarised within the "Areas of Audit Focus" section 02 of this report.

Below we have summarised the conclusions of our work on the areas of audit focus.

Fraud/Significant Risks	Findings & Conclusions
Misstatements due to fraud or error (management override)	We have not identified any material weaknesses in controls or evidence of material management override and not identified any instances of inappropriate judgements being applied from the work completed.
Incorrect capitalisation of revenue spend	We completed our work on the testing of REFCUS and capital additions during the year and have not identified any evidence of manipulation through inappropriate capitalisation.
Valuation of investment properties	We have completed our audit work in respect of to the valuation of investment properties and have no issues to report.
Area of audit focus	Findings & Conclusions
Infrastructure assets	We have completed our audit work on infrastructure assets and have no matters to report. The Council has applied the statutory override and Code adaptation and reported these assets on a net book value basis and made appropriate disclosures in the accounts related to this. Our work on depreciation has concluded this is materially accurate.
Pension liability valuation	We have completed the work on this area and not identified any issues.
Group financial statements	At the time of writing the report, the work on this area is on-going. We are waiting for the report from an external firm commissioned by the Council relating to the review of their group arrangements and accounting for these, including the joint ventures.
Going concern disclosures	We will complete our review of the going concern disclosure and the Council's assessment close to the date of our audit report. This will include review of supporting working papers and challenge of the assumptions underpinning management's assessment. We note that the disclosures will need to be revisited at the point the financial statements are authorised for issue to ensure that these remain appropriate to the Council's circumstances for the foreseeable future (e.g. the next twelve months).
Valuation of land and buildings	We have substantially completed the work on this area. Our work has identified some non material differences and are undertaking further work to consider the impact on the untested population.
Minimum revenue provision calculation	Our work in this area is ongoing as it was a late addition to our planned work.



## Executive Summary

### Areas of audit focus

We request that you review these and other matters set out in this report to ensure:

We request that you review these and other matters set out in this report to ensure:

- There are no residual further considerations or matters that could impact these issues
- You concur with the resolution of the issue
- There are no further significant issues you are aware of to be considered before the financial report is finalised

There are no other matters, other than those reported by management or disclosed in this report, which we believe should be brought to the attention of the Audit Committee or Management.

### Control observations

We have identified weaknesses in the Council's processes for the assessment of the group accounting and disclosure requirements in relation to the various Joint Venture arrangements the Council is a party to, as well as in relation to processes to support the audit of the accounts in a number of areas. Further details are included in section 7.

### Independence

Please refer to Section 09 for our update on Independence.



# 02

## Areas of Audit Focus



# Significant risk

### Misstatements due to fraud or error (management override)

#### 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 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.

We have not identified a heightened risk of management override overall, but we have identified a specific area where management override might occur: incorrect capitalisation of revenue spending. Our specific response to this risk is set out in the next slide.

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#### What judgements are we focused on?

We focussed on testing key areas that are susceptible to management bias including journal entries, material accounting estimates, and unusual transactions.

#### What did we do?

- Identified fraud risks during the planning stages, which reflect the significant fraud risk recognised in this report (the risk of inappropriate capitalisation of expenditure).
- Inquired of management about risks of fraud and the controls put in place to address those risks;
- Understood the oversight given by those charged with governance of management's processes over fraud;
- Considered the effectiveness of management's controls designed to address the risk of fraud;
- Determined an appropriate strategy to address those identified risks of fraud; and
- Performed mandatory procedures regardless of specifically identified fraud risks, including:
  - Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements
  - Assessing accounting estimates for evidence of management bias, and
  - Evaluating the business rationale for significant unusual transactions.

#### 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. Please also see pages 14 to 17 for our conclusion on valuation of investment properties, valuation of land and buildings and pension liability valuation.

Our testing of journals is completed with no material issues identified and is currently in review with the Manager and Partner.

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



## Significant risk

### Incorrect capitalisation of revenue expenditure

#### What is the risk?

In considering how the risk of management override may present itself, we concluded that this is primarily through management taking action to override controls and manipulate in year financial transactions that impact the medium to longer term projected financial position.

A key way of improving the revenue position is through the inappropriate capitalisation of revenue expenditure. The Council has a significant fixed asset base and capital expenditure and therefore has the potential to materially impact the revenue position through inappropriate capitalization of revenue spend.

#### What judgements are we focused on?

How management decides on appropriate capitalisation of revenue expenditure. Confirming additions to property, plant and equipment and investment property has been correctly classified and meet the relevant criteria.

#### What did we do?

In response to this risk, we:

- For significant capital additions, we examined invoices, capital expenditure authorisations, leases and other data that support these additions. We reviewed the sample selected against the definition of capital expenditure in IAS 16.
- We extended our testing of items capitalised in the year by lowering our testing threshold. We also reviewed a larger random sample of capital additions below our testing threshold.
- Reviewed and tested Revenue Expenditure Funded from Capital Under Statute (REFCUS), and verified that revenue costs have not been inappropriately funded from capital.
- Tested year end journals which moves expenditure from revenue to capital.

#### What are our conclusions?

We have completed our work on capital additions and REFCUS and have not identified any additions that were incorrectly capitalised or REFCUS items which did not meet the statutory definition.

Our testing of year end journals did not identify any movements from expenditure to capital outside of the normal course of business.



## Significant risk

### Valuation of investment properties

#### What is the risk?

The Council's investment properties represent a significant balance in the Council's accounts and are subject to valuation changes and impairment review.

Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.

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.

The ongoing impact of Covid-19 means there is potential for significant impact on the estimations and assumptions applied to asset valuations. This impacts, in particular, on investment properties valued at fair value due to the uncertainty over the future of rental income and predicted yields. There is therefore a risk that investment property may be misstated in the accounts.

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#### What did we do?

Considered the work performed by the Council's valuer over the Council's assets, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work;

- Assessed the classification of the assets and whether the appropriate valuation basis has been applied;
- Considered the annual cycle of valuations to ensure that investment property have been valued annually as required by the Code and considered if there are any specific changes to assets that have occurred and that these have been communicated to the valuer;
- Sample tested key asset information used by the valuer in performing their valuation, and agreed this to what had been recorded in the fixed asset register and general ledger.
- Tested accounting entries had been correctly processed in the financial statements; and
- Ensured that appropriate disclosure had been made in the financial statements concerning the material uncertainty relating to year end valuations.

#### What are our conclusions?

We concluded that we could rely on the work of the Council's valuer over the Council's investment property assets, and that the scope of the work performed and their professional capabilities were adequate.

We concluded that assets were correctly classified as investment properties and had been valued on an appropriate basis annually.

Sample testing of the individual valuations of 16 investment properties was undertaken. This work did not identify any differences.

We were satisfied that related accounting entries had been correctly processed in the financial statements.

We noted that the accounts did not include reference to the material uncertainty reported by the valuer in relation to retail and specific trading related assets/sectors such as car parks. We have asked management to consider whether they hold any such assets and if they do to include a disclosure regarding this in their accounts

## Other areas of audit focus

### What is the risk/area of focus?

#### Accounting for infrastructure assets

In March 2022, an issue was raised with the National Audit Office's Local Government technical network in relation to the accounting for infrastructure assets. Under the CIPFA Code, these assets are held at depreciated historic cost. It has been identified that, whilst local authorities add expenditure incurred on replacing or enhancing such assets, most do not appear to be reviewing the Code requirement to establish whether this spend is a replacement of an asset, or a recognised component, and therefore, are not derecognising the old component. As a consequence gross cost/gross accumulated depreciation are therefore continually increasing, and the balance sheet may be misstated where the expenditure is a replacement for an asset/component not fully depreciated.

The Council has a material infrastructure assets amounting to £117.6 million held on its balance sheet at 31 March 2021.

DLUHC issued a Statutory Instrument which came into effect on the 25 December 2022 which allowed for a temporary change in accounting rules in this area giving Authorities the option to account for Infrastructure Assets on a net rather than gross basis. CIPFA also released an update to the Local Authority Accounting Code and a Local Authority Accounting Panel (LAAP) bulletin was issued which provided practitioners guidance on how they should account for Infrastructure Assets should an Authority wish to adopt the Statutory Instrument

### What did we do?

#### We initially:

- Reviewed the draft financial statements to identify prima facie whether the Council is recording disposals of infrastructure assets, or components.
- Made enquiries to understand management's current processes, including bringing forward our knowledge from previous year's audits.

Once the Council confirmed that it chose to adopt the statutory instrument and Code adaptation we confirmed that:

- Confirmed the value of these assets is reported correctly on a net book value basis only.
- Performed a reasonableness check to determine whether the economic useful lives used by management to calculate depreciation were appropriate and obtained an understanding of how these had been determined.
- Compared the depreciation charge included in the financial statements to the potential depreciation charge using the CIPFA example useful economic lives.
- Reviewed updated accounting disclosure to ensure they are in line with the requirement of amended CIPFA code of practice and accurately reflected the Council's practices.

We are satisfied with the changes made to disclosures and that depreciation is materially accurate and have not identified any issues



# Other areas of audit focus

### What is the risk/area of focus?

#### Valuation of land and buildings

The value of land and buildings, which is the main element of property, plant and equipment, represents a significant balance in the Council's financial statements and is 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 and are likely to have a significant impact on the valuation of these assets.

### What did we do?

We:

- Checked the correct classification of the Council's land and buildings and that the appropriate valuation basis has therefore been adopted;
- Assessed the expertise and independence of management's valuation specialist by confirming their qualifications, experience in the sector and the terms of their engagement with the Council.
- Sample tested key asset information used by the valuers in performing their valuation (e.g. floor plans to support valuations based on price per square metre).
- Checked the annual cycle of valuations to ensure that assets have been valued within a 5 year rolling programme as required by the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom for property, plant and equipment.
- Identified assets not subject to valuation in 2020/21 and applied indices to confirm that the value of these assets had not changed materially since the last valuation date in order to confirm that the remaining asset base is not materially misstated.
- Reviewed the fixed asset register and confirmed there had been no significant changes to useful economic lives as a result of the most recent valuation.
- Tested that accounting entries have been correctly processed in the financial statements.

We have completed the procedures set out above and our findings are set out on the following slide.





# Other areas of audit focus (continued)

### Conclusion

#### Valuation of land and buildings

- We are satisfied that assets have been correctly classified and valued on an appropriate basis.
- We are satisfied that the scope of the work performed by the Council's valuer is appropriate and within their professional capabilities.
- Our sample testing of key asset information used by the valuers in performing their valuation (e.g. floor plans to support valuations based on price per square metre) has not identified any significant issues.
- We are satisfied that the annual cycle of valuations ensures that assets have been valued within a 5 year rolling programme as required by the Code for Property, plant and equipment.
- Our work in respect of reviewing assets not subject to valuation in 2020/21 to confirm that the remaining asset base is not materially misstated has not identified any material differences.

We did not identify any changes to useful economic lives as a result of the most recent valuation.

We confirmed that accounting entries have been correctly processed in the financial statements.

Based on the procedures completed, we have not identified any material errors in the valuation of the Council's land and buildings included in the property plant and equipment balance in the financial statements.

We have however noted a small number of non material differences in our sample testing and are undertaking further work to consider the impact on the untested population.

We will provide an update to the Committee once this additional work has been completed.

## Other areas of audit focus (continued)

### What is the risk/area of focus?

#### Pension liability valuation

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

The Council's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Council's balance sheet. At 31 March 2021, this totalled £546 million.

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

We:

- Liaised with the auditor of the Havering Pension Fund to obtain assurances over the information supplied to the actuary in relation to the London Borough of Havering.
- Assessed the work of the Pension Fund actuary including the assumptions they have used by relying on the work of PWC, being the Consulting Actuaries commissioned by the National Audit Office for all Local Government sector auditors, and considering any relevant reviews by the EY Pensions actuarial team.
- Reviewed and tested the accounting entries and disclosures made within the Council's financial statements in relation to IAS19.
- The revised ISA 540 standard requires auditors to test the method of measurement of accounting estimates to determine whether the model is appropriately designed, consistently applied and mathematically accurate, and that the integrity of the assumptions and the data has been maintained in applying the model. Neither we, nor PWC as consulting actuaries commissioned by the NAO for all local government sector audits, are able to access the detailed models of the actuaries in order to evidence these requirements. Therefore, we undertook alternate procedures to create an auditor's estimate, to provide a different method of gaining assurance. We employed the services of an EY Pensions specialist to review the Council's IAS19 reports, run a parallel actuarial model and compare to that produced by Hymans Robertson.

Our conclusion:

We have considered the information provided by the EY Pensions actuarial team and are satisfied that the information supplied to the actuary is accurate and the assumptions applied by the actuary are reasonable.

We have considered the assurance report received from the Havering Pension Fund Auditor and assessed that the impact of the difference identified in the valuation of investments asset values is not material to the Council.

We have also agreed the Council's IAS 19 disclosures to the actuaries' report and ensured these are fairly stated in the accounts.

Our procedures to determine our own estimate for the Council's pension liability found that the liability calculated by the actuary fell within our reasonable range.

## Other areas of audit focus (continued)

### What is the risk/area of focus?

#### Group financial statements

The Council has entered into three Joint Venture arrangements for the redevelopment and regeneration of the Rainham and Beam Park Housing Zone, Bridge Close, and 12 housing estates within the Borough.

The Council consolidated the transactions or balances relating to these joint venture arrangements within its group financial statements for the first time in 2019/20. Although 2020/21 will be the second year of consolidation for the joint ventures there remains a risk that they may not be consolidated accurately and that all required disclosures may not be included in the accounts, particularly as the level of activity in and size of the joint ventures increases.

#### Minimum revenue provision calculation

Under statute the Council is required to calculate and set aside a minimum revenue provision (MRP) for the repayment of debt. The Council's MRP is not material, however in light of the significant levels of borrowing associated with the Council's regeneration programme we have identified a risk that the provision may not be appropriately calculated, resulting in a risk of material understatement.

### What did we do?

We:

- Reviewed the amounts consolidated by the Council and determined its accuracy
- Assessed the completeness of disclosures made within the Council's financial statements in relation to the Group.

Our work on this area has been particularly challenging and a number of meetings have been held with management to try to gain a clear understanding of the relationship between the Council and the three JVs and subsidiary company and the appropriate accounting requirements and disclosures.

The Council subsequently engaged an external firm to review the arrangements and provide advice on the appropriate accounting requirements. This work is still in progress.

We are not able to progress our work in this area until management has received and considered this report.

We engaged and EY MRP specialist to review the Council's policy and calculations to ensure they are in line with the statutory requirements and provide assurance that the resulting provision is materially accurate.

Our work on this area is ongoing.

# Other areas of audit focus (continued)

### What is the risk/area of focus?

#### Going concern disclosures

Covid-19 has created a number of financial pressures throughout Local Government. It has created financial stress leading to increased expenditure in specific services, and reductions in income sources.

In addition, the auditing standard, International Auditing Standard 570 Going Concern, 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, so for the Corporation the 2020/21 financial statements are the first to be impacted. CIPFA's Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 states that an authority's financial statements shall be prepared on a going concern basis; the accounts should be prepared on the assumption that the functions of the authority will continue in operational existence for the foreseeable future and can only be discontinued under statutory prescription.

However, ISA 570, as applied by Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom, still requires auditors to undertake sufficient and appropriate audit procedures to consider whether there is a material uncertainty on going concern that requires reporting by management within the financial statements, and within the auditor's report.

To do this, the auditor must review management's assessment of the going concern basis applying IAS1 Presentation of Financial Statements.

### What did we do?

We have initially:

- Reviewed management's going concern assessment in the draft financial statements.
- Read the Narrative Report and financial statement disclosures in relation to the financial statements being prepared on a going concern basis to ensure that they were consistent with our knowledge of the Council's financial position.
- Reviewed, tested and challenged the supporting evidences provided by management in relation to going concern
- Assessed the reasonableness of the assumptions included in the Council's cash flow forecasts.
- Stress tested the Council's medium term financial strategy

At the time of writing, this work is subject to Manager and Partner review

We will request an updated cashflow forecast and assessment from management that cover the going concern period, which is at least twelve months from the audit report date.

We note that the disclosures will need to be revisited at the point the financial statements are authorised for issue to ensure that these remain appropriate to the Council's circumstances for the foreseeable future (e.g. the next twelve months).



# 03 Audit Report



## Draft audit report

### Our DRAFT opinion on the financial statements

#### INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF LONDON BOROUGH OF HAVERING - DRAFT

##### Opinion

We have audited the financial statements of London Borough of Havering for the year ended 31 March 2021 under the Local Audit and Accountability Act 2014. The financial statements comprise the:

- Authority and Group Movement in Reserves Statement,
- Authority and Group Comprehensive Income and Expenditure Statement, Authority and Group Balance Sheet, Authority and Group Cash Flow Statement the related notes 1 to 45
- Housing Revenue Account Income and Expenditure Statement, the Movement on the Housing Revenue Account Statement and the related notes 1 to 5
- Collection Fund and the related notes 1 to 2

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 2020/21.

In our opinion the financial statements:

- give a true and fair view of the financial position of London Borough of Havering and Group as at 31 March 2021 and of its expenditure and income for the year then ended; and
- have been prepared properly in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

##### 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 for the audit of the financial statements section of our report below. We are independent of the [authority/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 the Comptroller and Auditor General's (C&AG) AGN01, 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.

##### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Chief Operating (Section 151) Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the authority's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Chief Operating (Section 151) Officer with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the authority's ability to continue as a going concern.

##### Other information

The other information comprises the information included in the Statement of Accounts 2020/21, other than the financial statements and our auditor's report thereon. The Chief Operating (Section 151) Officer is responsible for the other information contained within the annual report.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

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 course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to



# Audit Report

## Our opinion on the financial statements

determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

## Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Council;
- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014;
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014;
- we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2021.

We have nothing to report in these respects.

## Responsibility of the Chief Operating (Section 151) Officer

As explained more fully in the Statement of the Chief Operating (Section 151) Officer's Responsibilities set out on page 19, the Chief Operating (Section 151) Officer 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 2020/21, and for being satisfied that they give a true and fair view and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Chief Operating (Section 151) Officer is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Authority either intends to cease operations, or have no realistic alternative but to do so.

The Authority 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 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.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the



## Our opinion on the financial statements

primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the entity and management.

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Council and determined that the most significant are:
  - Local Government Act 1972,
  - School Standards and Framework Act 1998,
  - Local Government and Housing Act 1989 (England and Wales),
  - Local Government Finance Act 1988 (as amended by the Local Government Finance Act 1992),
  - Education Act 2002 and school Standards and Framework Act 1998 (England),
  - Local Government Act 2003,
  - The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (as amended in 2018 and 2020),
  - Business Rate Supplements Act 2009,
  - The Local Government Finance Act 2012,
  - The Local Audit and Accountability Act 2014, and
  - The Accounts and Audit Regulations 2015.

In addition, the Council has to comply with laws and regulations in the areas of anti-bribery and corruption, data protection, employment Legislation, tax Legislation, general power of competence, procurement and health & safety.

- We understood how London Borough of Havering is complying with those frameworks by understanding the incentive, opportunities and motives for non-compliance, including inquiring of management/head of internal audit/those charged with governance/monitoring officer and obtaining and reading documentation relating to the procedures in place to identify, evaluate and comply with laws and regulations, and whether they are aware of instances of non-compliance. We corroborated this through our reading of the Council's committee

minutes, through enquiry of employees to confirm Council policies, and through the inspection of other information. Based on this understanding we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures had a focus on compliance with the accounting framework through obtaining sufficient audit evidence in line with the level of risk identified and with relevant legislation.

- We assessed the susceptibility of the council's financial statements to material misstatement, including how fraud might occur by understanding the potential incentives and pressures for management to manipulate the financial statements, and performed procedures to understand the areas in which this would most likely arise. Based on our risk assessment procedures, we identified inappropriate capitalisation of revenue expenditure and management override of controls to be our fraud risks.
- To address our fraud risk around the manipulation of reported financial performance through improper recognition of revenue, we obtained the Council's manual year end income accruals, challenging assumptions and corroborating the income to appropriate evidence.
- To address our fraud risk of inappropriate capitalisation of revenue expenditure we tested the Council's capitalised expenditure to ensure the capitalisation criteria were properly met and the expenditure was genuine.
- To address our fraud risk of management override of controls, we tested specific journal entries identified by applying risk criteria to the entire population of journals. For each journal selected, we tested specific transactions back to source documentation to confirm that the journals were authorised and accounted for appropriately.

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





## Our opinion on the financial statements

### Scope of the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We have undertaken our review in accordance with the Code of Audit Practice, having regard to the guidance on the specified reporting criteria issued by the Comptroller and Auditor General (C&AG) in April 2021, as to whether the London Borough of Havering had proper arrangements for financial sustainability, governance and improving economy, efficiency and effectiveness. The Comptroller and Auditor General determined these criteria as those necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether the London Borough of Havering put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2021.

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 London Borough of Havering had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

### 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 Authority's Whole of Government Accounts consolidation pack. We are satisfied that this work does not have a material effect on the financial statements or our work on value for money arrangements.

In addition, we cannot formally conclude the audit and issue an audit certificate until we have issued our Auditor's Annual Report for the year ended 31 March 2021. We have completed our work on the value for money arrangements and will report the outcome of our work in our commentary on those arrangements within the Auditor's Annual Report.

Until we have completed these procedures, we are unable to certify that we have completed the audit of the accounts in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.

### Use of our report

This report is made solely to the members of London Borough of Havering, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and for no other purpose, as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Debbie Hanson (Key Audit Partner)  
Ernst & Young LLP (Local Auditor)  
City  
Date



# 04 Audit Differences





## Audit Differences

In the normal course of any audit, we identify misstatements between amounts we believe should be recorded in the financial statements and the disclosures and amounts actually recorded. These differences are classified as “known” or “judgemental”. Known differences represent items that can be accurately quantified and relate to a definite set of facts or circumstances. Judgemental differences generally involve estimation and relate to facts or circumstances that are uncertain or open to interpretation.

As the audit is not yet fully complete, further differences may be identified in relation to the outstanding areas noted in the Executive Summary. An update will be provided to the Committee for the new differences identified, if any subsequent to the release of this report.

### Summary of unadjusted and adjusted differences

At the time of this report, we have not identified any corrected differences to bring to your attention. However as our work is ongoing differences may be identified, particularly in relation to the group accounting and disclosures.

We highlight misstatements greater than £0.52 million which have been identified during the course of our audit.

#### Unadjusted Audit Differences

We have identified two projected misstatements in relation to expenditure and creditors as follows:

- Overstatement of creditors as a result of two sampled items which were not supported with evidence and one item where a purchase order was raised but should have been cancelled. The projected misstatement amounts to £0.65 million.
- Overstatement of expenditure as a result of unsupported expenditure. The projected misstatement amounts to £1.93 million.

We also identified reclassification adjustments as a result of misclassification of codes between sundry debtors and sundry creditors amounting to £0.68 million.

Significant changes were also required to the grant disclosures. These adjustments are in the process of being agreed with management.

There are also small number of minor disclosure misstatements which are currently being agreed with management and which we expect to be adjusted.

As noted above, our audit is not yet complete and further differences may be identified during the completion of the outstanding procedures.



# 05 Value for Money



# Value for money

## The Council's responsibilities for value for money (VFM)

The Council is required to maintain an effective system of internal control that supports the achievement of its policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at its disposal.

As part of the material published with its financial statements, the Council is required to bring together commentary on its governance framework and how this has operated during the period in a governance statement. In preparing its governance statement, the Council tailors the content to reflect its own individual circumstances, consistent with the requirements set out in the CIPFA code of practice on local authority accounting. This includes a requirement to provide commentary on its arrangements for securing value for money from their use of resources.

## Risk assessment

In the performance of our risk assessment procedures, we identified one risk of a significant weaknesses in the Council's VFM arrangements relating to Governance reporting criteria:

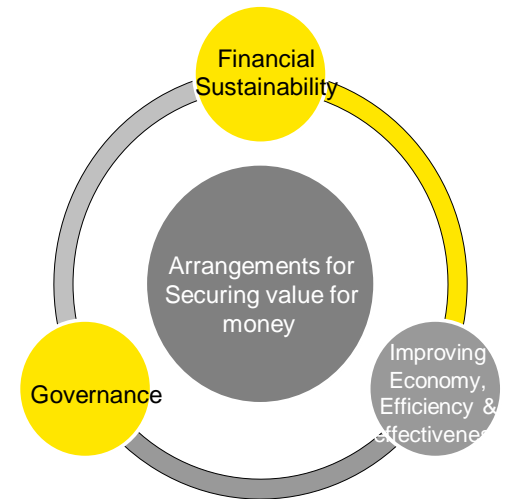
- Council's governance of the regeneration schemes being delivered through the joint venture partners.

With respect to the Havering and Wates and Rainham and Beam Park Regeneration joint ventures, we have:

- Reviewed whether the Council makes properly informed decisions through access to appropriate and reliable financial and performance information relating to the regeneration scheme
- Reviewed how the Council is working with the JVs to deliver its intended strategic priorities from the housing regeneration schemes (i.e., affordable housing and income)
- Reviewed how the Council reflects significant changes to the funding / benefits of the regeneration scheme in its annual budget setting process

With respect to the Bridge Close Regeneration LLP, we have reviewed the arrangements and concluded on whether:

- The termination of the JV agreement with private sector partner and the ownership transfer of the JV assets adhered to Council processes
- Risks arising from the relationship termination were assessed and mitigated accordingly
- New governance processes were implemented to reflect the Council's sole ownership of the venture



## Status of our VFM work

Our VFM work has been completed and no significant weakness in arrangements were identified.

We will report the outcome of our work on the Council's arrangements in our VFM commentary within the Auditor's Annual Report.



# 06 Other reporting issues

## Other reporting issues

### Consistency of other information published with the financial statements, including the Annual Governance Statement

We must give an opinion on the consistency of the financial and non-financial information in the Statement of Accounts for the year 2020/21 with the audited financial statements.

We must also review the Annual Governance Statement for completeness of disclosures, consistency with other information from our work, and whether it complies with relevant guidance.

At the time of writing, we have not concluded our work to determine whether the financial information in the final version of the Statement of Accounts 2020/21 and published with the financial statements was consistent with the audited financial statements. We will complete this procedure once we receive the final version of accounts including audit amendments.

We have reviewed the Annual Governance Statement and can confirm it is consistent with other information from our audit of the financial statements and we have no other matters to report.

### Whole of Government Accounts

Alongside our work on the financial statements, we also review and report to the National Audit Office on your Whole of Government Accounts return. The extent of our review, and the nature of our report, is specified by the National Audit Office.

We will perform those procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of our audit.

The audit certificate will be issued once this work is complete and we have reported our VfM commentary in the Auditors Annual Report.

### Other powers and duties

We have a duty under the Local Audit and Accountability Act 2014 to consider whether to report on any matter that comes to our attention in the course of the audit, either for the Council to consider it or to bring it to the attention of the public (i.e. "a report in the public interest"). We did not identify any issues which required us to issue a report in the public interest.

We also have a duty to make written recommendations to the Council, copied to the Secretary of State, and take action in accordance with our responsibilities under the Local Audit and Accountability Act 2014. We have not identified any relevant issues.

## Other reporting issues

### Other matters

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Authority's financial reporting process. They include the following:

- Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- Any significant difficulties encountered during the audit;
- Any significant matters arising from the audit that were discussed with management;
- Written representations we have requested;
- Expected modifications to the audit report;
- Any other matters significant to overseeing the financial reporting process;
- Findings and issues around the opening balance on initial audits (if applicable);
- Related parties;
- External confirmations;
- Going concern;
- Consideration of laws and regulations; and
- Group audits.

We have no significant matters to report in relation to the above.





07

# Assessment of Control Environment



# Assessment of Control Environment

## Financial controls

It is the responsibility of the Council to develop and implement systems of internal financial control and to put in place proper arrangements to monitor their adequacy and effectiveness in practice. Our responsibility as your auditor is to consider whether the Council has put adequate arrangements in place to satisfy itself that the systems of internal financial control are both adequate and effective in practice.

As part of our audit of the financial statements, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. As we have adopted a fully substantive approach, we have therefore not tested the operation of controls.

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.

We have identified control issue which we wish to bring to your attention related to the following areas:

Poor processes for the assessment of the group accounting and disclosure requirements in relation to the various Joint Venture arrangements the Council is a party to. There was also a lack of understanding of the arrangements and their impact on the financial statements.

Processes to support the audit of the accounts in a number of areas. Main areas identified were:

- Provision of year end transaction level listings to support debtor and creditor balances in the accounts to enable audit testing
- Poor timeliness and quality of working papers and responses to audit queries. For example, 'source' evidence provided was often simply a journal rather than the originating document for the transaction such as an invoice or purchase order
- Quality of the grants disclosures were of a poor quality and not Code compliant. This resulted in significant additional audit time and a fundamental re-working of the notes

We recommend that the Council reviews its processes in the areas noted above and ensures that it has a clear understanding of Code requirements in these areas and has processes in place to ensure it is able to comply with these requirements

We also recommend that the Council undertakes a review of the processes and working papers to support the audit of the financial statements to ensure working papers are fit for purpose and that officers understand what is meant by audit evidence and source documentation. We would be happy to assist in facilitating any training in this area.



# 08 Data Analytics



# Data analytics

## Journal Entry Testing

### What is the risk?

In line with ISA 240 we are required to test the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements.

### What judgements are we focused on?

Using our analysers we are able to take a risk based approach to identify journals with a higher risk of management override, as outlined in our audit planning report.

### What did we do?

We obtained general ledger journal data for the period and have used our analysers to identify characteristics typically associated with inappropriate journal entries or adjustments, and journals entries that are subject to a higher risk of management override.

We then performed tests on the journals identified to determine if they were appropriate and reasonable.

### What are our conclusions?

Our testing of journals is completed with no material issues identified and is currently in review with Manager and Partner.

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# Independence

## Relationships, services and related threats and safeguards

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The FRC Ethical Standard requires that we provide details of all relationships between Ernst & Young (EY) and the Council, and its members and senior management and its affiliates, including all services provided by us and our network to the Council, its members and senior management and its affiliates, and other services provided to other known connected parties that we consider may reasonably be thought to bear on the our integrity or objectivity, including those that could compromise independence and the related safeguards that are in place and why they address the threats.

There are no relationships from 1<sup>st</sup> April 2020 to the date of this report, which we consider may reasonably be thought to bear on our independence and objectivity.

### Services provided by Ernst & Young

The next page includes a summary of the fee due for the year ended 31 March 2021 in line with the disclosures set out in FRC Ethical Standard and in statute. Full details of the services that we have provided are shown below.

At the time of writing, we have undertaken non-audit work in relation to the housing benefits assurance process (HBAP). Non audit work is work not carried out under the Code. We have adopted the necessary safeguards in our completion of this work and complied with Auditor Guidance Note 1 issued by the NAO in December 2017. There are no other non-audit services being provided to the Council.

### Transparency Report 2022

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 2022:

[EY UK 2022 Transparency Report | EY UK](#)

## Relationships, services and related threats and safeguards

### Services provided by Ernst & Young

Description	Planned Fee - 2020/21 (£)	Scale Fee - 2020/21 (£)	Final Fee - 2019/20 (£)
PSAA Scale fee	116,920	116,920	116,920 (a)
<b>Recurring variation to the scale fee</b>	91,147 (b)	91,147 (b)	N/A
Total variation to the scale fee	N/A	N/A	92,798 (a)
Group/JVs issues	TBC (c)	N/A	N/A
Infrastructure assets	500 (d)	N/A	N/A
Analytics charge	2,500 (e)	N/A	N/A
Revised financial statements review	TBC (f)	N/A	N/A
MRP review	TBC (g)	N/A	N/A
Delays during the audit	8,000 (h)	N/A	N/A
Others	TBC (i)	N/A	N/A
PSAA expected additional core fees:		N/A	N/A
VFM	10,000 (j)	N/A	N/A
ISA 540 accounting estimates	4,400 (j)	N/A	N/A
<b>Total Proposed Fees</b>	<b>TBC</b>	<b>208,067</b>	<b>209,718</b>

All fees exclude VAT

## Relationships, services and related threats and safeguards

### Services provided by Ernst & Young

- (a) For 2019/20, PSAA approved a total of £92,978 fee variation in addition to the scale fee of £116,920. The additional fees represents the cost incurred in assessing the risks the Council faced in relation to Covid-19, increased FRC challenge, Group accounts, technical accounting issues, VFM, PPE and Pension valuations, and others (e.g. quality preparation issues).
- (b) For 2020/21, we presented the details of proposed resetting of the scale fee to the previous Audit Committee during 2021.
- (c) This fee variation relates to the on-going work carried out on the arrangements the Council has in relation to its subsidiary and joint ventures.
- (d) This fee variation relates to the additional significant risk for 20/21 relating to accounting of Infrastructure assets
- (e) Due to system change during the middle of the year, two data analysers were required to perform the audit. This also includes the audit team review of the completeness of the data migration from old to new system.
- (f) The fee variation relates to the review to be carried out on the revised financial statements once all audit adjustments have been amended.
- (g) The fee variation relates to the review carried out on the Council's Minimum revenue provision (MRP) which is currently on-going.
- (h) The fee variation relates to the accumulated delays in provision of evidences in relation to debtors, creditors, income, expenditure, etc
- (i) Other fee variations may arise up to signing of the financial statements since audit is still on-going at the time of writing the report.
- (j) In August 2021, PSAA published 'Additional information for 2020/21 audit fees'. PSAA commissioned external independent technical research for setting standardised fee variations to assess the expected impact on audit work programmes of a range of new and updated audit requirements. In the absence of alternate information, we have included the same minimum fees in 2021/22.

Items b) to j) are subject to final discussion with management and the approval of PSAA.





# 10 Appendices

## Audit approach update

We summarise below our approach to the audit of the balance sheet and any changes to this approach from the prior year audit.

Our audit procedures are designed to be responsive to our assessed risk of material misstatement at the relevant assertion level. Assertions relevant to the balance sheet include:





- **Existence:** An asset, liability and equity interest exists at a given date
- **Rights and Obligations:** An asset, liability and equity interest pertains to the entity at a given date
- **Completeness:** There are no unrecorded assets, liabilities, and equity interests, transactions or events, or undisclosed items
- **Valuation:** An asset, liability and equity interest is recorded at an appropriate amount and any resulting valuation or allocation adjustments are appropriately recorded

**P** Presentation and Disclosure: Assets, liabilities and equity interests are appropriately aggregated or disaggregated, and classified, described and disclosed in accordance with the applicable financial reporting framework. Disclosures are relevant and understandable in the context of the applicable financial reporting framework

**T** There were no significant changes to our audit approach from the prior year apart from adding the accounting for Infrastructure assets as significant risk for 2020/21.

# Required communications with the Audit Committee

There are certain communications that we must provide to the those charged with governance of UK entities. We have detailed these here together with a reference of when and where they were covered:

			 Our Reporting to you
Required communications	 What is reported?	  When and where	
Terms of engagement	Confirmation by the Audit Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the 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.	Audit Plan - April 2021	
Planning and audit approach	Communication of the planned scope and timing of the audit, any limitations and the significant risks identified.	Audit Plan - April 2021	
Significant findings from the audit	<ul style="list-style-type: none"> <li>• Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>• Significant difficulties, if any, encountered during the audit</li> <li>• Significant matters, if any, arising from the audit that were discussed with management</li> <li>• Written representations that we are seeking</li> <li>• Expected modifications to the audit report</li> <li>• Other matters if any, significant to the oversight of the financial reporting process</li> </ul>	This Audit Results Report  Annual Auditor's Report - TBC	




## Appendix B

		Our Reporting to you
Required communications	What is reported?	When and where
Going concern	<p>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</p> <ul style="list-style-type: none"> <li>• Whether the events or conditions constitute a material uncertainty related to going concern</li> <li>• Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>• The appropriateness of related disclosures in the financial statements</li> </ul>	This Audit Results Report
Misstatements	<ul style="list-style-type: none"> <li>• Uncorrected misstatements and their effect on our audit opinion, unless prohibited by law or regulation</li> <li>• The effect of uncorrected misstatements related to prior periods</li> <li>• A request that any uncorrected misstatement be corrected</li> <li>• Material misstatements corrected by management</li> </ul>	This Audit Results Report
Subsequent events	<ul style="list-style-type: none"> <li>• Enquiry of the audit committee where appropriate regarding whether any subsequent events have occurred that might affect the financial statements.</li> </ul>	This Audit Results Report
Fraud	<ul style="list-style-type: none"> <li>• Enquiries of the audit committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity</li> <li>• Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</li> <li>• Unless all of those charged with governance are involved in managing the entity, any identified or suspected fraud involving:               <ol style="list-style-type: none"> <li>a. Management;</li> <li>b. Employees who have significant roles in internal control; or</li> <li>c. Others where the fraud results in a material misstatement in the financial statements.</li> </ol> </li> <li>• The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</li> <li>• Any other matters related to fraud, relevant to Audit, Standards and Statutory Accounts Committee responsibility.</li> </ul>	This Audit Results Report

## Appendix B

		Our Reporting to you
Required communications	What is reported?	When and where
Related parties	<p>Significant matters arising during the audit in connection with the entity's related parties including, when applicable:</p> <ul style="list-style-type: none"> <li>• Non-disclosure by management</li> <li>• Inappropriate authorisation and approval of transactions</li> <li>• Disagreement over disclosures</li> <li>• Non-compliance with laws and regulations</li> <li>• Difficulty in identifying the party that ultimately controls the entity</li> </ul>	ProThis Audit Results Report
Independence	<p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence.</p> <p>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</p> <ul style="list-style-type: none"> <li>• The principal threats</li> <li>• Safeguards adopted and their effectiveness</li> <li>• An overall assessment of threats and safeguards</li> <li>• Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul> <p>Communications whenever significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place.</p>	<p>Provisional Audit Plan - April 2021</p> <p>This Audit Results Report</p> <p>Annual Auditor's Report - TBC</p>
External confirmations	<ul style="list-style-type: none"> <li>• Management's refusal for us to request confirmations</li> <li>• Inability to obtain relevant and reliable audit evidence from other procedures.</li> </ul>	This Audit Results Report
Consideration of laws and regulations	<ul style="list-style-type: none"> <li>• Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</li> <li>• Enquiry of the audit committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the audit committee may be aware of</li> </ul>	This Audit Results Report

## Appendix B

		Our Reporting to you
Required communications	 What is reported?	  When and where
Significant deficiencies in internal controls identified during the audit	<ul style="list-style-type: none"> <li>Significant deficiencies in internal controls identified during the audit.</li> </ul>	This Audit Results Report Annual Auditor's Report - TBC
Group Audits	<ul style="list-style-type: none"> <li>An overview of the type of work to be performed on the financial information of the components</li> <li>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</li> <li>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</li> <li>Any limitations on the group audit, for example, where the group engagement team's access to information may have been restricted</li> <li>Fraud or suspected fraud involving group management, component management, employees who have significant roles in group-wide controls or others where the fraud resulted in a material misstatement of the group financial statements.</li> </ul>	Provisional Audit Plan - April 2021 This Audit Results Report
Written representations we are requesting from management and/or those charged with governance	<ul style="list-style-type: none"> <li>Written representations we are requesting from management and/or those charged with governance</li> </ul>	This Audit Results Report
Material inconsistencies or misstatements of fact identified in other information which management has refused to revise	<ul style="list-style-type: none"> <li>Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</li> </ul>	This Audit Results Report
Auditors report	<ul style="list-style-type: none"> <li>Key audit matters that we will include in our auditor's report</li> <li>Any circumstances identified that affect the form and content of our auditor's report</li> </ul>	This Audit Results Report

# Management representation letter - Draft

This is our draft letter of management representation. This could be subject to change following the completion of the final audit procedures

## Management Rep Letter

[To be prepared on the entity's letterhead]

*[Date]*

Debbie Hanson

Ernst & Young  
400 Capability Green  
Luton, LU1 3LU

This letter of representations is provided in connection with your audit of the consolidated and Council financial statements of London Borough of Havering ("the Group and Council") for the year ended 31 March 2021. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the consolidated and Council financial statements give a true and fair view of the Group and Council financial position of London Borough of Havering as of 31 March 2021 and of its financial performance and its cash flows for the year then ended in accordance with, for the Group and Council, CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

We understand that the purpose of your audit of our consolidated and Council financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing, which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

### A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with, for the Group and Council, the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
2. We acknowledge, as members of management of the Group and Council, our responsibility for the fair presentation of the consolidated and Council financial statements. We believe the consolidated and Council financial statements referred to above give a true and fair view of the financial position, financial performance and cash flows of the Group and Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)) and are free of material misstatements, including omissions. We have approved the consolidated and Council financial statements.
3. The significant accounting policies adopted in the preparation of the Group and Council financial statements are appropriately described in the Group and Council financial statements.

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1. As members of management of the Group and Council, we believe that the Group and Council have a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21(as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022) for the Group and Council that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic and the effects of the conflicts and related sanctions in Ukraine, Russia and/or Belarus on our system of internal controls.
2. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the consolidated and Council financial statements taken as a whole. We have not corrected these differences identified and brought to our attention by the auditor because [specify reasons for not correcting misstatement].
3. We confirm the Group and Council does not have securities (debt or equity) listed on a recognized exchange.

### B. Non-compliance with law and regulations, including fraud

1. We acknowledge that we are responsible for determining that the Group and Council's activities are conducted in accordance with laws and regulations and that we are responsible for identifying and addressing any non-compliance with applicable laws and regulations, including fraud.
2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud

3. We have disclosed to you the results of our assessment of the risk that the consolidated and Council financial statements may be materially misstated as a result of fraud.
4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Group or Council (regardless of the source or form and including without limitation, any allegations by "whistleblowers"), including non-compliance matters:
  - involving financial statements;
  - related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the consolidated or Council's financial statements;
  - related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Group or Council's activities, its ability to continue to operate, or to avoid material penalties;
  - involving management, or employees who have significant roles in internal controls, or others; or
  - in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

### C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:





# Management representation letter

## Management Rep Letter

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- Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
  - Additional information that you have requested from us for the purpose of the audit; and
  - Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
1. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the consolidated and Council financial statements, including those related to the COVID-19 pandemic and including those related to the conflict can related sanction in Ukraine, Russia and/or Belarus.
  2. We have made available to you all minutes of the meetings of the Group and Council, and Audit, Cabinet, Governance, and Full Council committees held through the year to the most recent meeting on the following date: *[list date]*.
  3. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Group and Council's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the year ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the consolidated and Council financial statements.
  4. We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are
    1. appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with applicable financial reporting framework.
    2. We have disclosed to you, and the Group and Council has complied with, all aspects of contractual agreements that could have a material effect on the consolidated and Council financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
    3. From the date of our last management representation letter through the date of this letter we have disclosed to you any unauthorized access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants) , to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material impact on the Group and Council financial statements, in each case or in the aggregate, and (2) ransomware attacks when we paid or are contemplating paying a ransom, regardless of the amount.
- D. Liabilities and Contingencies
1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the consolidated and Council financial statements.
  2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.

# Management representation letter

## Management Rep Letter

3. We have recorded and/or disclosed, as appropriate, all liabilities related to litigation and claims, both actual and contingent, and have disclosed in Note 26 to the consolidated and Council financial statements all guarantees that we have given to third parties.

### E. Going Concern

1. Note 1 to the consolidated and Council financial statements discloses all the matters of which we are aware that are relevant to the Group and Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

### F. Subsequent Events

1. Other than disclosure described in Note 6 to the consolidated and Council financial statements, there have been no events, including events related to the COVID-19 pandemic, and including events related to the conflict and related sanctions in Ukraine, Russia and/or Belarus, subsequent to year end which require adjustment of or disclosure in the consolidated and Council financial statements or notes thereto.

### G. Group audits

1. Necessary adjustments have been made to eliminate all material intra-group unrealised profits on transactions amongst the Council, subsidiary undertakings and associated undertakings.

### H. Other information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises Narrative Report and Annual Governance Statement.

2. We confirm that the content contained within the other information is consistent with the financial statements.

### I. Climate-related matters

1. We confirm that to the best of our knowledge all information that is relevant to the recognition, measurement, presentation and disclosure of climate-related matters has been considered.
2. The key assumptions used in preparing the consolidated and Council financial statements are, to the extent allowable under the requirements of applicable financial reporting framework, aligned with the statements we have made in the other information or other public communications made by us.

### J. Ownership of Assets

1. Except for assets recognised as right-of-use assets in accordance with IFRS 16 *Leases*, the Group and Council has satisfactory title to all assets appearing in the balance sheet, and there are no liens or encumbrances on the Group and Council's assets, nor has any asset been pledged as collateral. All assets to which the Group and Council has satisfactory title appear in the balance sheet.
2. All agreements and options to buy back assets previously sold have been properly recorded and adequately disclosed in the consolidated and Council financial statements.

# Management representation letter

## Management Rep Letter

### K. Reserves

1. We have properly recorded or disclosed in the consolidated and Council financial statements the useable and unusable reserves.

### L. Use of the Work of a Specialist

1. We agree with the findings of the specialists that we engaged to evaluate the valuation of investment property, land and buildings and pension liabilities and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the consolidated and Council financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.

### M. Estimates

#### Property and Pension liability valuation Estimates

1. We confirm that the significant judgments made in making the property and pension liability valuation estimates have taken into account all relevant information and the effects of the COVID-19 pandemic of which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the property and pension liability valuation estimates.

3. We confirm that the significant assumptions used in making the property and pension liability valuation estimates appropriately reflect our intent and ability to carry out [describe the specific courses of action] on behalf of the entity.

4. We confirm that the disclosures made in the consolidated and Council financial statements with respect to the accounting estimates, including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

5. We confirm that appropriate specialized skills or expertise has been applied in making the property and pension liability valuation estimates.

6. We confirm that no adjustments are required to the accounting estimates and disclosures in the consolidated and Council financial statements, including due to the COVID-19 pandemic.

### N. Retirement benefits

1. On the basis of the process established by us and having made appropriate enquiries, we are satisfied that the actuarial assumptions underlying the scheme liabilities are consistent with our knowledge of the business. All significant retirement benefits and all settlements and curtailments have been identified and properly accounted for.

*Yours faithfully,*

\_\_\_\_\_  
Chief Operating (Section 151) Officer

\_\_\_\_\_  
Chairman of the Audit Committee

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