## **Crawley Borough Council**

Year ending 31 March 2016

### **Outline Audit Plan**

9 March 2016

Ernst & Young LLP







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Audit Committee Crawley Borough Council Town Hall The Boulevard Crawley West Sussex RH10 1UZ

9 March 2016

**Dear Committee Members** 

### **Outline Audit Plan**

We are pleased to attach our Outline Audit Plan which sets out how, at this initial stage of our audit planning, we intend to carry out our responsibilities as auditor. Its purpose is to provide the Audit Committee with a basis to review our proposed audit approach and scope for the 2015/16 audit in accordance with the requirements of the Local Audit and Accountability Act 2014, the National Audit Office's 2015 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements. It is also to ensure that our audit is aligned with the Committee's service expectations.

Should the information in this plan change as a result of our work, we will provide you with an update of our audit plan when our interim audit has been completed.

We welcome the opportunity to discuss this outline plan with you 30 March 2016 and to understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Paul King Executive Director

For and behalf of Ernst & Young LLP Enc

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

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

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

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

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

### 1. Overview

#### Context for the audit

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

- Our audit opinion on whether the financial statements of Crawley Borough Council give a true and fair view of the financial position as at 31 March 2016 and of the income and expenditure for the year then ended;
- Our conclusion on the Council's arrangements to secure economy, efficiency and effectiveness; and
- We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on the Council's Whole of Government Accounts return.

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

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

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

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

We will provide an update to the Audit Committee on the results of our work in these areas in our report to those charged with governance scheduled for delivery in July 2016.

### 2. Financial statement risks

We outline below our current assessment of the financial statement risks facing the Council, identified through our knowledge of the Council's operations and discussion with those charged with governance and officers.

At our meeting, we will seek to validate these with you.

Significant risk

#### Our response

#### Risk of management override

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.

Our approach will focus on:

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

Other financial statement risks

#### Our response

#### **Non Domestic Rates Appeals Provision**

Due to significant uncertainty surrounding the outcome of the Non Domestic Rates NDR) appeals in progress, there is a risk that the provision recognised in the accounts might be measured at an incorrect amount. While the risk of appeal is inherent to all business rate collectors, it is particularly so where the business rate base contains individually large businesses, which for the Council includes Gatwick Airport.

The council is confident that its provision for 2015/16 covers all anticipated appeals, but the inherent risk remains.

Our approach will focus on:

- Gaining an understanding and assessing the reasonableness of the council's methodology in estimating ant planned provision in respect of rateable value appeals outstanding at the balance sheet date;
- Considering both the completeness and accuracy of the data on the number of appeals outstanding and the basis for the assumption made by the Council on the likelihood of success; and
- Reviewing and relying on the work of any experts appointed by management to assist in this process.

#### Respective responsibilities in relation to fraud and error

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

Our responsibility is to plan and perform audits to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatements whether caused by error or fraud. As auditors, we approach each engagement with a questioning

mind that accepts the possibility that a material misstatement due to fraud could occur, and design the appropriate procedures to consider such risk.

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

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

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### Economy, efficiency and effectiveness

We are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. For 2015/16 this is based on the overall evaluation criterion:

"In all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people"

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

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

In considering your proper arrangements, we will draw on the requirements of the CIPFA/SOLACE framework for local government to ensure that our assessment is made against a framework that you are already required to have in place and to report on through documents such as your annual governance statement.

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

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

We are still in the process of completing our risk assessment and will continue to update this during the course of our planning and interim work. Based on the work we have completed to date, we have not identified any significant risks which we view as relevant to our value for money conclusion.

We will keep our risk assessment under review throughout our audit and communicate to the Audit Committee any revisions to the specific risks identified here and any additional local risk-based work we may need to undertake as a result.

### 4. Our audit process and strategy

### 4.1 Objective and scope of our audit

Under the Code of Audit Practice our principal objectives are to review and report on the Council's:

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

We issue an audit report that covers:

### i Financial statement audit and regularity audit

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

We report to you by exception in respect of your governance statement, and other accompanying material as required, in accordance with relevant guidance prepared by the NAO on behalf of the Comptroller and Auditor General.

Alongside our audit report, we also:

Review and report to the NAO on the Whole of Government Accounts return to the extent and in the form they require.

### ii Arrangements for securing economy, efficiency and effectiveness

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

### 4.2 Audit process overview

#### **Analytics**

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

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

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

#### Internal audit

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

### Use of experts

We will use specialist EY resource as necessary to help us to form a view on judgments made in the financial statements. Our plan currently includes involving specialists in pension balances.

### Mandatory procedures required by auditing standards

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

#### Procedures required by standards

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

### Procedures required by the Code

- ► Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Governance Statement;
- ► Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO; and
- Satisfying ourselves that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Finally, we are also required to discharge our statutory duties and responsibilities as established by the Local Audit and Accountability Act 2014.

### 4.3 Materiality

For the purposes of determining whether the financial statements are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in aggregate, could reasonably be expected to influence the users of the financial statements. Our evaluation requires professional judgement and so takes into account qualitative as well as quantitative considerations implied in the definition.

We have determined the proposed overall materiality for the financial statement of the Council is £2,582,460 based on 2% of 2014/15 audited gross expenditure. We will communicate uncorrected audit misstatements greater than £129,123 to you. We will revisit this figure when the draft 2015/16 financial statements are available.

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

### 4.4 Fees

The duty to prescribe fees is a statutory function delegated to Public Sector Audit Appointments Ltd (PSAA) by the Secretary of State for Communities and Local Government. PSAA has published a scale fee for all relevant bodies. 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 NAO Code. The indicative scale fee for the audit of Crawley Borough Council is £65,313 with an additional estimated indicative fee of £11,386 for the certification of the housing benefit subsidy claim.

### 4.5 Your audit team

The engagement team is led by Paul King, who has significant experience in auditing local government clients. He is supported by Malcolm Haines as manager who is responsible for the day-to-day direction of audit work and is the key point for the Council's finance team.

### 4.6 Timetable of communication, deliverables and insights

We have set out below a timetable showing the key stages of the audit, including the VFM work and the Whole of Government Accounts. The timetable includes the deliverables we have agreed to provide to the Council through the Audit Committee's cycle in 2015/16. These dates are determined to ensure our alignment with PSAA's rolling calendar of deadlines.

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

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

Audit phase	Timetable	Audit Committee timetable	Deliverables
High level planning	December	March 2016	Audit Fee letter (reported March 2015)
planning	2015		Progress Report
Risk assessment and setting of scopes	December 2015	March 2016	Audit Plan
Testing routine processes and controls	March 2016	March 2016	Progress Report
Year-end audit	May/June 2016		As below
Completion of audit	July 2016	July 2016	Report to those charged with governance via the Audit Results Report
			Audit report (including our opinion on the financial statements; and, [by exception] overall value for money conclusion).
			Audit completion certificate
			Reporting to the NAO on the Whole of Government Accounts return.
Conclusion of reporting	By 31 October 2016	December 2016	Annual Audit Letter

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

### 5. Independence

### 5.1 Introduction

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

### Required communications

#### Planning stage

### The principal threats, if any, to objectivity and independence identified by EY including consideration of all relationships between you, your affiliates and directors and us;

- The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality Review:
- The overall assessment of threats and safeguards;
- Information about the general policies and process within EY to maintain objectivity and independence.

### Final stage

- A written disclosure of relationships (including the provision of non-audit services) that bear on our objectivity and independence, the threats to our independence that these create, any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed;
- Details of non-audit services provided and the fees charged in relation thereto;
- Written confirmation that we are independent;
- Details of any inconsistencies between APB Ethical Standards, the Audit Commission's Standing Guidance and your policy for the supply of non-audit services by EY and any apparent breach of that policy; and
- An opportunity to discuss auditor independence issues.

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

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

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

### 5.2 Relationships, services and related threats and safeguards

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

#### Self-interest threats

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

At the time of writing, there are no long outstanding fees.

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

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

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

#### Self-review threats

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

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

### Management threats

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

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

#### Other threats

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

There are no other threats at the date of this report

### **Overall Assessment**

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

### 5.3 Other required communications

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

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

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

### Appendix A Fees

A breakdown of our agreed fee is shown below.

	Planned Fee 2015/16 £	Scale fee 2015/16 £	Outturn fee 2014/15 £	Explanation
Opinion Audit and VFM Conclusion	£65,313	£65,313	£87,084	The year-on-year variance is explained by further scale fee reductions applied after the closure of the Audit Commission on 31 March 2015.
Total Audit Fee – Code work	£65,313	£65,313	£87,084	
Certification of claims and returns <sup>1</sup>	£11,386	£11,386	£12,630	
Non-audit work	0	0	0	

All fees exclude VAT.

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

- Officers meeting the agreed timetable of deliverables;
- ► The operating effectiveness of the internal controls for the key processes outlined in section 4.2 above;
- ▶ We can rely on the work of internal audit, where planned;
- ► The NAO making no significant changes to the value for money guidance on which our conclusion will be based;
- ▶ Our accounts opinion and value for money conclusion being unqualified;
- Appropriate quality of documentation is provided by the Council; and
- ► The Council has an effective control environment.

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

<sup>&</sup>lt;sup>1</sup> Our fee for the certification of grant claims is based on the indicative scale fee set by the Audit Commission.

# Appendix B UK required communications with those charged with governance

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

Required communication		Re	Reference		
Planning and audit approach		•	Audit Plan		
Со	mmunication of the planned scope and timing of the audit including any limitations.				
Sig	gnificant findings from the audit	<b>•</b>	Report to those charged		
•	Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures		with governance		
•	Significant difficulties, if any, encountered during the audit				
<b>&gt;</b>	Significant matters, if any, arising from the audit that were discussed with management				
•	Written representations that we are seeking				
•	Expected modifications to the audit report				
•	Other matters if any, significant to the oversight of the financial reporting process				
Misstatements		<b>•</b>	Report to those charged		
•	Uncorrected misstatements and their effect on our audit opinion		with governance		
•	The effect of uncorrected misstatements related to prior periods				
•	A request that any uncorrected misstatement be corrected				
•	In writing, corrected misstatements that are significant				
Fraud		•	Report to those charged		
•	Enquiries of the Audit Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity		with governance		
•	Any fraud that we have identified or information we have obtained that indicates that a fraud may exist				
•	A discussion of any other matters related to fraud				
Re	lated parties	<b>•</b>	Report to those charged		
	nificant matters arising during the audit in connection with the entity's related rties including, when applicable:		with governance		
•	Non-disclosure by management				
•	Inappropriate authorisation and approval of transactions				
•	Disagreement over disclosures				
•	Non-compliance with laws and regulations				
•	Difficulty in identifying the party that ultimately controls the entity				
External confirmations		•	Report to those charged		
•	Management's refusal for us to request confirmations	with governance			
•	Inability to obtain relevant and reliable audit evidence from other procedures				
Сс	nsideration of laws and regulations	•	Report to those charged		
<b>&gt;</b>	Audit findings regarding non-compliance where the non-compliance is material and believed to be intentional. This communication is subject to compliance with legislation on tipping off		with governance		
•	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				
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Required communication		Reference		
Independence	<b>•</b>	Audit Plan		
Communication of all significant facts and matters that bear on EY's objectivity and independence	•	Report to those charged with governance		
Communication of key elements of the audit engagement director's consideration of independence and objectivity such as:				
► The principal threats				
<ul> <li>Safeguards adopted and their effectiveness</li> </ul>				
<ul> <li>An overall assessment of threats and safeguards</li> </ul>				
<ul> <li>Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul>				
Going concern  Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:		Report to those charged		
		with governance		
<ul> <li>Whether the events or conditions constitute a material uncertainty</li> </ul>				
Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements				
<ul> <li>The adequacy of related disclosures in the financial statements</li> </ul>				
Significant deficiencies in internal controls identified during the audit	•	Report to those charged with governance		
Fee Information	•	Audit Plan		
Breakdown of fee information at the agreement of the initial audit plan Breakdown of fee information at the completion of the audit	•	Report to those charged with governance		
, , , , , , , , , , , , , , , , , , , ,	•	Annual Audit Letter if considered necessary		
Opening Balances		Report to those charged with governance		
► Findings and issues regarding the opening balance of initial audits				
Certification work  ▶ Summary of certification work undertaken		Annual Report to those charged with governance summarising grant certification.		

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