# KPMG

# External Audit Plan 2016/2017

**Lincolnshire County Council and Lincolnshire Pension Fund** 

March 2017

### Headlines

#### **Financial Statement Audit**



There are no significant changes to the Code of Practice on Local Authority Accounting in 2016/17, which provides stability in terms of the accounting standards the Authority need to comply with.

#### Materiality

Materiality for planning purposes has set at £12 million for the Authority and £19 million for the Pension Fund.

We are obliged to report to 'those charged with governance' uncorrected omissions or misstatements other than those which are 'clearly trivial'. The 'trivial' threshold has been set at £0.6 million for the Authority and £0.9 million for the Pension Fund.

#### **∞**Significant risks

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

- Significant changes in the pension liability due to LGPS Triennial Valuation;
- The effective operation of Agresso; and
- Carrying out the year end processes and schools' consolidation effectively and on time.

#### Other areas of audit focus

Those risks with less likelihood of giving rise to a material error but which are nevertheless worthy of audit understanding have been identified as:

- The disclosure and reporting changes required by the 2016 CIPFA Code on Local Authority Accounting for the Authority and Pension Fund statements; and
- The Pension Fund administration provider's performance and changes to the fund manager arrangements.

#### See pages 3 to 6 for more details.





We have identified significant risks for our continuing audit work:

- Financial management and monitoring arrangements, and the Corporate Support Services Provider's performance, which are relevant to the 'informed decision making' and 'working with partners' sub-criteria of the VFM conclusion.
- Financial Standing and medium term financial planning, which is relevant to the 'sustainable resource deployment' sub-criteria of the VFM conclusion.

We will update our assessment throughout the year and report in our ISA260.

#### See pages 8 to 11 for more details

#### Logistics

Our team is:

- John Cornett Partner/Director
- Mike Norman –Manager
- John Pressley Assistant Manager

More details are on page 14.

Our work will be completed in four phases from December to September and our key deliverables are this Audit Plan and a Report to those charged with Governance as outlined on **page 13**.

The scale fees set by Public Sector Audit Appointments for the audits are £107,325 (£107,325 2015/2016) for the Authority and £24,350 (£24,350 2015/16) for the Pension Fund see page 12.



### Introduction

#### **Background and Statutory responsibilities**

This document supplements our Audit Fee Letter 2016/17 presented to you in April 2016, which also sets out details of our appointment by Public Sector Audit Appointments Ltd (PSAA).

Our statutory responsibilities and powers are set out in the Local Audit and Accountability Act 2014 and the National Audit Office's Code of Audit Practice.

Our audit has two key objectives, requiring us to audit/review and report on your:

- Financial statements (including the Annual Governance Statement): Providing an opinion on your accounts; and
- Use of resources: Concluding on the arrangements in place for securing economy, efficiency and effectiveness in your use of resources (the value for money conclusion).

he audit planning process and risk assessment is an on-going process and the sessment and fees in this plan will be kept under review and updated if necessary.

#### **6**oknowledgements

We would like to take this opportunity to thank officers and Members for their continuing help and co-operation throughout our audit work.

#### **Financial Statements Audit**

Our financial statements audit work follows a four stage audit process which is identified below. Appendix 1 provides more detail on the activities that this includes. This report concentrates on the Financial Statements Audit Planning stage of the Financial Statements Audit.

Financial
Statements Audit
Planning

Control
Evaluation

Substantive
Procedures

Completion

#### **Value for Money Arrangements Work**

Our Value for Money (VFM) Arrangements Work follows a five stage process which is identified below. Page 7 provides more detail on the activities that this includes. This report concentrates on explaining the VFM approach for the 2016/17 [and the findings of our VFM risk assessment].





### Financial statements audit planning



#### **Financial Statements Audit Planning**

Our planning work takes place during December 2016 to January 2017. This involves the following key aspects:

- Risk assessment;
- Determining our materiality level; and
- Issuing this audit plan to communicate our audit strategy.

#### Risk assessment

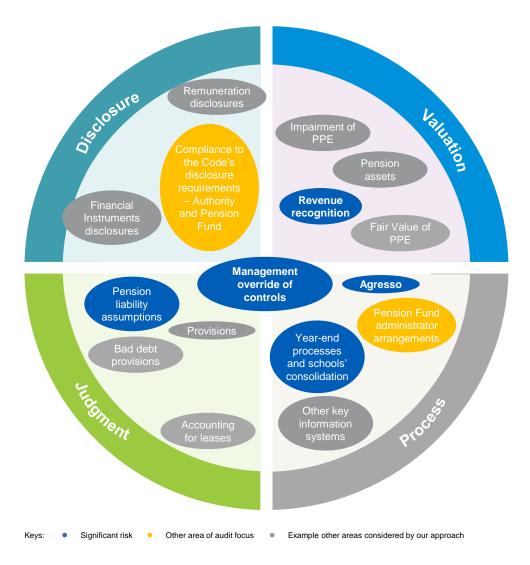
Professional standards require us to consider two standard risks for all organisations. We are not elaborating on these standard risks in this plan but consider them as a matter of equirse in our audit and will include any findings arising from our work in our A 260 Report.

Management override of controls – Management is typically in a powerful position to

Management override of controls – Management is typically in a powerful position to perpetrate fraud owing to its ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. Our audit methodology incorporates the risk of management override as a default significant risk. In line with our methodology, we carry out appropriate controls testing and substantive procedures, including over journal entries, accounting estimates and significant transactions that are outside the normal course of business, or are otherwise unusual.

 Fraudulent revenue recognition – We do not consider this to be a significant risk for local authorities as there are limited incentives and opportunities to manipulate the way income is recognised. We therefore rebut this risk and do not incorporate specific work into our audit plan in this area over and above our standard fraud procedures.

The diagram opposite identifies, significant risks and other areas of audit focus, which we expand on overleaf. The diagram also identifies a range of other areas considered by our audit approach.





### Financial statements audit planning (cont.)



#### Significant Audit Risks - the Authority and Pension Fund

Those risks requiring specific audit attention and procedures to address the likelihood of a material financial statement error.

#### Risk: Significant changes in the pension liability due to LGPS Triennial Valuation

During the year, the Pension Fund has undergone a triennial valuation with an effective date of 31 March 2016 in line with the Local Government Pension Scheme (Administration) Regulations 2013. The share of pensions assets and liabilities for each admitted body is determined in detail, and a large volume of data is provided to the actuary to support this triennial valuation.

The pension numbers to be included in the financial statements for 2016/17 will be based on the output of the triennial valuation rolled forward to 31 March 2017. For 2017/18 and 2018/19 the actuary will then roll forward the valuation for accounting purposes based on more limited data.

here is a risk that the data provided to the actuary for the valuation exercise is inaccurate and that these inaccuracies affect the actuarial figures in the accounts.

The Pension Fund only includes limited disclosures around pensions liabilities but we anticipate that this will be identified as a risk area by some of the admitted bodies, whose pension liabilities represent a significant element of their balance sheet. This includes the Authority itself.

**Our approach:** As part of our audit of the Pension Fund, we will undertake work on a test basis to agree the data provided to the actuary back to the systems and reports from which it was derived and to understand the controls in place to ensure the accuracy of this data. This work will be focused on the data relating to the Authority itself as largest member of the Pension Fund.

If we receive specific requests from the auditors of other admitted bodies, we are required to support their audits under the protocols put in place by the PSAA for this purpose. If the work they request is over and above that already planned, there will be additional costs arising from this. The Pension Fund can consider recharging these costs to the relevant admitted bodies

#### Significant Audit Risks - the Authority and Pension Fund

Those risks requiring specific audit attention and procedures to address the likelihood of a material financial statement error.

#### Risk: Agresso

The Authority experienced significant difficulties during 2015/16 with the operation of the newly introduced Agresso system and the performance of its support services provider. This included major problems in: accurately processing the monthly payrolls; making timely and accurate payments through the accounts payable procedures; and accounting for transactions, and monitoring and reporting its financial performance due to problems with the operation of the general ledger.

In our 2015/16 ISA260 report we assessed the Authority's control environment and concluded that whilst the Authority had exerted considerable efforts to address the difficulties arising from the implementation of its new financial and payroll systems not all the weaknesses in the system controls and financial reporting arrangements had been fully addressed. The Authority has continued to review and strengthen its arrangements during 2016/17 but in the meantime we regard the weaknesses in the system controls and financial reporting arrangements a significant audit risk for this year's Authority and Pension Fund financial statements.

**Our approach:** We will liaise with Internal Audit and the finance team to assess the progress the Authority has made in strengthening the Agresso system controls. We will confirm our audit testing strategy to determine the appropriate balance of controls and substantive testing. We will substantively test the main payroll, payments and cash reconciliations.



### Financial statements audit planning (cont.)



#### Significant Audit Risks - the Authority

Those risks requiring specific audit attention and procedures to address the likelihood of a material financial statement error.

#### Risk: Year end processes and schools consolidation

The difficulties encountered with Agresso in 2015/16 impacted on the completeness and timing of some of the important year-end accounts closure processes:

- the year-end schools consolidation was delayed and the draft accounts were published before it was completed. Changes were required to the published final statements to reflect the outcome of the process.
- alongside that, there were a larger than normal number of non-material uncleared or unprocessed items. The year-end bank reconciliations included a number of non-unaterial reconciling items which need to be cleared during 2016/17.

It Pimportant that the 2016/17 closure programme and timetable addresses these dimulties and the prior year unprocessed items are cleared.

**Our approach:** We will liaise with the finance team regarding the closedown plans and arrangements for addressing the difficulties encountered in 2015/16. We will confirm the key dates and information requirements. We will review the steps taken to clear the 2015/16 non-material uncleared and unreconcilied balances and confirm with the finance team the effective and timely operation of reconciliation controls in the current year.

#### Other areas of audit focus

Those risks with less likelihood of giving rise to a material error but which are nevertheless worthy of audit understanding.

### Risk : 2016 CIPFA Code on Local Authority Accounting – Authority disclosure and reporting changes

The new Code includes a number of important changes on the previous year's reporting requirements. The changes include new formats and reporting requirements for the Comprehensive Income and Expenditure Statement and the Movement in Reserves Statement, and the introduction of a new Expenditure and Funding Analysis as a result of CIPFA's 'Telling the Story' review of the presentation of local authority financial statements.

**Our approach:** We will liaise with the Authority's finance team regarding the new requirements and agree the new disclosures, including the restatement of the prior year comparators.

#### Risk: 2016 CIPFA Code on Local Authority Accounting - Pension Fund disclosures

CIPFA's Example Accounts and Disclosure Checklist includes a small number changes to the expected fair value disclosures required under the Code. Other changes include an analysis of investment management expenses in line with CIPFA's Accounting for Local Government Pension Scheme Management Expenses (2016), new investment classifications and an additional disclosure note covering remuneration of key management personnel.

**Our approach:** We will discuss the new requirements with the Pension Fund team and agree the new disclosures, including any restatement of the prior year comparators.

#### Risk : Pension Fund administrator arrangements

The changes to the arrangements introduced in 2015/16 have become more established during 2016/17 although the provider is not yet consistently meeting all the required performance standards.

**Our approach:** We will discuss the Provider's performance with the Pension Fund team and confirm the information required for the audit.



### Other areas of audit focus



Those risks with less likelihood of giving rise to a material error but which are nevertheless worthy of audit understanding.

Financial statements audit planning (cont.)

#### **Risk: Changes to the Pension Fund Manager arrangements**

During 2016/17 there have been several changes to the fund managers in operation. These changes have included an external fund manager taking over responsibility for managing the internally managed portfolio (c.£350m).

**Our approach:** We will review the steps taken to effectively manage these changes and confirm the arrangements for obtaining appropriate year-end valuations and relevant Service Auditor Reports on the fund managers' controls.

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### Financial statements audit planning (cont.)



#### **Materiality**

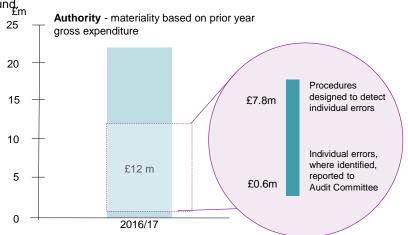
We are required to plan our audit to determine with reasonable confidence whether or not the financial statements are free from material misstatement. An omission or misstatement is regarded as material if it would reasonably influence the user of financial statements. This therefore involves an assessment of the qualitative and quantitative nature of omissions and misstatements.

Generally, we would not consider differences in opinion in respect of areas of judgement to represent 'misstatements' unless the application of that judgement results in a financial amount falling outside of a range which we consider to be acceptable.

For the Authority, materiality for planning purposes has been set at £12m (£12m 2015/16) which equates to a little over 1% of estimated gross expenditure.

For the Pension Fund, materiality for planning purposes has been set at £19m (£16m 2015/16) when equates to 1% of forecast gross assets. The increase reflects the expected growth in the market value of investments and the embedding of the controls introduced in the previous year.

We design our procedures to detect errors in specific accounts at a lower level of precision. For planning purposes this lower threshold has been set at £7.8m for the Authority and £12.3m for the Pension Fund.



#### **Reporting to the Audit Committee**

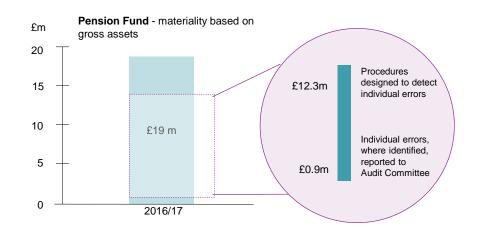
Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Audit Committee any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work.

Under ISA 260(UK&I) 'Communication with those charged with governance', we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. ISA 260 (UK&I) defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.

In the context of the Authority, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £0.6 million.

In the context of the Pension Fund, we propose that an individual difference could normally be considered to be clearly trivial it is less than £0.9 million.

If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Audit Committee to assist it in fulfilling its governance responsibilities.





# Value for money arrangements work



#### Background to approach to VFM work

The Local Audit and Accountability Act 2014 requires auditors of local government bodies to be satisfied that the authority 'has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources'.

This is supported by the Code of Audit Practice, published by the NAO in April 2015, which requires auditors to 'take into account their knowledge of the relevant local sector as a whole, and the audited body specifically, to identify any risks that, in the auditor's judgement, have the potential to cause the auditor to reach an inappropriate conclusion on the audited body's arrangements.'

The VFM approach is fundamentally unchanged from that adopted in 2015/2016 and the process is shown in the diagram below. The diagram overleaf shows the details of the criteria for our VFM work.





# Value for money arrangements work (cont.)



#### **Overall 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.

Informed decision making

#### **Proper arrangements:**

- Acting in the public interest, through demonstrating and applying the principles and values of sound governance.
- Understanding and using appropriate and reliable financial and performance information to support informed decision making and performance management.
- Reliable and timely financial reporting that supports the delivery of strategic priorities.
- Managing risks effectively and maintaining a sound system of internal control.

Sustainable resource deployment

#### **Proper arrangements:**

- Planning finances effectively to support the sustainable delivery of strategic priorities and maintain statutory functions.
- Managing and utilising assets to support the delivery of strategic priorities.
- Planning, organising and developing the workforce effectively to deliver strategic priorities.

Working with partners and third parties

#### **Proper arrangements:**

- Working with third parties effectively to deliver strategic priorities.
- Commissioning services effectively to support the delivery of strategic priorities.
- Procuring supplies and services effectively to support the delivery of strategic priorities.



# Value for money arrangements work (cont.)



VFM audit stage	Audit approach		
VFM audit risk assessment	We consider the relevance and significance of the potential business risks faced by all local authorities, and other risks that apply specifically to the Authority. These are the significant operational and financial risks in achieving statutory functions and objectives, which are relevant to auditors' responsibilities under the <i>Code of Audit Practice</i> .		
	In doing so we consider:		
	The Authority's own assessment of the risks it faces, and its arrangements to manage and address its risks;		
	<ul> <li>Information from the Public Sector Auditor Appointments Limited VFM profile tool;</li> </ul>		
	Evidence gained from previous audit work, including the response to that work; and		
	■ The work of other inspectorates and review agencies.		
Inkages with financial catatements and other pudit work	There is a degree of overlap between the work we do as part of the VFM audit and our financial statements audit. For example, our financial statements audit includes an assessment and testing of the Authority's organisational control environment, including the Authority's financial management and governance arrangements, many aspects of which are relevant to our VFM audit responsibilities.		
95	We have always sought to avoid duplication of audit effort by integrating our financial statements and VFM work, and this will continue. We will therefore draw upon relevant aspects of our financial statements audit work to inform the VFM audit.		
Identification of significant risks	The Code identifies a matter as 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. Significance has both qualitative and quantitative aspects.'		
	If we identify significant VFM risks, then we will highlight the risk to the Authority and consider the most appropriate audit response in each case, including:		
	<ul> <li>Considering the results of work by the Authority, inspectorates and other review agencies; and</li> </ul>		
	<ul> <li>Carrying out local risk-based work to form a view on the adequacy of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources.</li> </ul>		



## Value for money arrangements work (cont.)



#### VFM audit stage Audit approach Depending on the nature of the significant VFM risk identified, we may be able to draw on the work of other inspectorates, review agencies and other Assessment of work by other relevant bodies to provide us with the necessary evidence to reach our conclusion on the risk. If such evidence is not available, we will instead need to consider what additional work we will be required to undertake to satisfy ourselves that we have reasonable evidence to support the conclusion that we will draw. Such work may include: Delivery of local risk based Meeting with senior managers across the Authority; work Review of minutes and internal reports: Examination of financial models for reasonableness, using our own experience and benchmarking data from within and without the sector. **Concluding on VFM** At the conclusion of the VFM audit we will consider the results of the work undertaken and assess the assurance obtained against each of the VFM rangements themes regarding the adequacy of the Authority's arrangements for securing economy, efficiency and effectiveness in the use of resources. If any issues are identified that may be significant to this assessment, and in particular if there are issues that indicate we may need to consider qualifying our VFM conclusion, we will discuss these with management as soon as possible. Such issues will also be considered more widely as part of KPMG's quality control processes, to help ensure the consistency of auditors' decisions. Reporting We have completed our initial VFM risk assessment and identified the following significant VFM risks. Financial management and monitoring arrangements, and the Corporate Support Services Provider's performance – The problems with Agresso and the operation of the Corporate Support Services contract in 2015/16 meant that the Authority did not have effective financial management and monitoring arrangements, and recovery measures have continued to operate well into 2016/17. We qualified 2015/16 VFM conclusion, on the basis that the difficulties encountered in the year represented significant weaknesses in the Authority's arrangements for informed decision making and working with third parties. These issues have continued to represent risks in relation to the relevant sub-criteria of the VFM conclusion and we will assess the actions taken by the Authority to address these weaknesses in its arrangements. Financial standing and medium term financial planning - The Authority continues to face similar financial pressures and uncertainties to those experienced by others in the local government sector. The Authority has continued to only publish a one year budget, with 2017/18 being the latest. The Authority needs to have effective arrangements in place for managing its annual budget, generating income and identifying and implementing any savings required to balance its medium term financial plan. This is relevant to the sustainable resource deployment sub-criteria of the VFM conclusion. We will update our assessment throughout the year should any new issues present themselves and report against these in our ISA260. We will report on the results of the VFM audit through our ISA 260 Report. This will summarise any specific matters arising, and the basis for our overall conclusion. The key output from the work will be the VFM conclusion (i.e. our opinion on the Authority's arrangements for securing VFM), which forms part of our audit report.

### Other matters

#### Whole of government accounts (WGA)

We are required to review your WGA consolidation and undertake the work specified under the approach that is agreed with HM Treasury and the National Audit Office. Deadlines for production of the pack and the specified approach for 2016/17 have not yet been confirmed.

#### **Elector challenge**

The Local Audit and Accountability Act 2014 gives electors certain rights. These are:

- The right to inspect the accounts;
- The right to ask the auditor questions about the accounts; and
- The right to object to the accounts.

As a result of these rights, in particular the right to object to the accounts, we may need to undertake additional work to form our decision on the elector's objection. The additional work could range from a small piece of work where we interview an officer and review evidence to form our decision, to a more detailed piece of work, where we have to terview a range of officers, review significant amounts of evidence and seek legal presentations on the issues raised.

The costs incurred in responding to specific questions or objections raised by electors is not part of the fee. This work will be charged in accordance with the PSAA's fee scales.

#### Our audit team

Our audit team will be led by John Cornett and is unchanged from 2015/16. Appendix 2 provides more details on specific roles and contact details of the team.

#### **Reporting and communication**

Reporting is a key part of the audit process, not only in communicating the audit findings for the year, but also in ensuring the audit team are accountable to you in addressing the issues identified as part of the audit strategy. Throughout the year we will communicate with you through meetings with the finance team and the Audit Committee. Our communication outputs are included in Appendix 1.

#### Independence and Objectivity

Auditors are also required to be independent and objective. Appendix 3 provides more details of our confirmation of independence and objectivity.

#### **Audit fee**

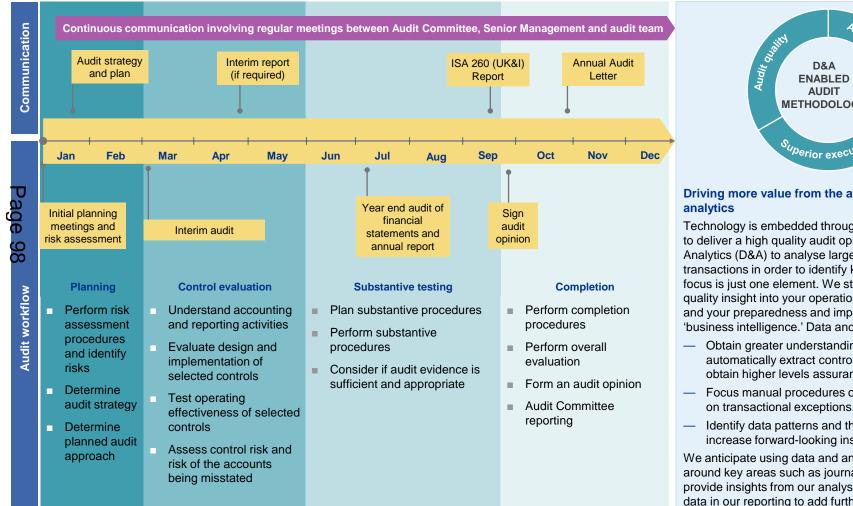
Our Audit Fee Letter 2016/2017 presented to you in April 2016 first set out the scale fee set by PSAA for the 2016/2017 audit. This letter also set out our assumptions. The scale audit fee for 2016/17 for the Authority is £107,325 (£107,325 in 2015/2016) and for the Pension Fund is £24,350 (£24,350 2015/16). In addition to the scale fees we needed to charge further fees of £14,052 and £2,097 for the 2015/16 audits of the Authority and Pension Fund respectively. These were to meet the additional costs of addressing the significant audit and VFM risks identified in the audit plan and the issues which emerged during the audits. We have identified significant risks and areas of audit focus in this plan which will require us to carry out additional work in support of our audit opinion and VFM conclusion. We will update the Authority as the audits progress on the fees needed to accommodate the additional audit work required.

Our audit fees includes our work on the VFM conclusion and our audit of the Authority's financial statements.



# Appendix 1: Key elements of our financial statements audit approach







### Driving more value from the audit through data and

Technology is embedded throughout our audit approach to deliver a high quality audit opinion. Use of Data and Analytics (D&A) to analyse large populations of transactions in order to identify key areas for our audit focus is just one element. We strive to deliver new quality insight into your operations that enhances our and your preparedness and improves your collective 'business intelligence,' Data and Analytics allows us to:

- Obtain greater understanding of your processes, to automatically extract control configurations and to obtain higher levels assurance.
- Focus manual procedures on key areas of risk and on transactional exceptions.
- Identify data patterns and the root cause of issues to increase forward-looking insight.

We anticipate using data and analytics in our work around key areas such as journals. We also expect to provide insights from our analysis of these tranches of data in our reporting to add further value from our audit.



### Appendix 2: Audit team

Name **Position** 



Your audit team has been drawn from our specialist public sector assurance department. Our audit team were all part of the Authority and Pension Fund audits last year.

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hn Cornett والم irector

**1**116 256 6064 hn.cornett@kpmg.co.uk



Mike Norman
Manager
0115 935 3544
michael.norman@kpmg.co.uk

Name

**Position** 

Mike Norman

'I will continue to be responsible for the

of the Authority and Pension Fund.

the Audit and Risk Manager.1

management, review and delivery of the audit

I will liaise with the County Finance Officer and

Manager



Name	John Pressley
Position	Assistant Manager
	'I will be responsible for the on-site delivery of our work on the Authority's financial statements and the Pension Fund this year. I will liaise with the Finance Team. I will also supervise the work of our audit assistants.'

'My role is to lead our team and ensure the delivery

of a high quality, valued added external audit

I will be the main point of contact for the Audit

Committee, Chief Executive and Strategic

John Cornett

Director

opinion.

Directors.'

John Pressley **Assistant Manager** 07919697377 John.Pressley@kpmg.co.uk



### Appendix 3: Independence and objectivity requirements

#### Independence and objectivity

Professional standards require auditors to communicate to those charged with governance, at least annually, all relationships that may bear on the firm's independence and the objectivity of the audit engagement partner and audit staff. The standards also place requirements on auditors in relation to integrity, objectivity and independence.

The standards define 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case this is the Audit Committee.

KPMG LLP is committed to being and being seen to be independent. APB Ethical Standards require us to communicate to you in writing all significant facts and matters, including those related to the provision of non-audit services and the safeguards put in prace, in our professional judgement, may reasonably be thought to bear on KPMG LLP's independence and the objectivity of the Engagement Lead and the audit team.

courther to this auditors are required by the National Audit Office's Code of Audit Practice to:

- Carry out their work with integrity, independence and objectivity;
- Be transparent and report publicly as required;
- Be professional and proportional in conducting work;
- Be mindful of the activities of inspectorates to prevent duplication;
- Take a constructive and positive approach to their work;
- Comply with data statutory and other relevant requirements relating to the security, transfer, holding, disclosure and disposal of information.

PSAA's Terms of Appointment includes several references to arrangements designed to support and reinforce the requirements relating to independence, which auditors must comply with. These are as follows:

 Auditors and senior members of their staff who are directly involved in the management, supervision or delivery of PSAA audit work should not take part in political activity.

- No member or employee of the firm should accept or hold an appointment as a member of an audited body whose auditor is, or is proposed to be, from the same firm. In addition, no member or employee of the firm should accept or hold such appointments at related bodies, such as those linked to the audited body through a strategic partnership.
- Audit staff are expected not to accept appointments as Governors at certain types of schools within the local authority.
- Auditors and their staff should not be employed in any capacity (whether paid or unpaid) by an audited body or other organisation providing services to an audited body whilst being employed by the firm.
- Auditors appointed by the PSAA should not accept engagements which involve commenting on the performance of other PSAA auditors on PSAA work without first consulting PSAA.
- Auditors are expected to comply with the Terms of Appointment policy for the Engagement Lead to be changed on a periodic basis.
- Audit suppliers are required to obtain the PSAA's written approval prior to changing any Engagement Lead in respect of each audited body.
- Certain other staff changes or appointments require positive action to be taken by Firms as set out in the Terms of Appointment.

#### **Confirmation statement**

We confirm that at the date of this plan in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the Engagement Lead and audit team is not impaired.







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This report is addressed to the Authority and has been prepared for the sole use of the Authority. We take no responsibility to any member of staff acting in their individual capacities, or to third parties. We draw your attention to the Statement of Responsibilities of auditors and audited bodies, which is available on Public Sector Audit Appointment's website (www.psaa.co.uk).

External auditors do not act as a substitute for the audited body's own responsibility for putting in place proper arrangements to ensure that public business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

We are committed to providing you with a high quality service. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact John Cornett the engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with your response please contact the national lead partner for all of KPMG's work under our contract with Public Sector Audit Appointments Limited, Andrew Sayers, by email to <a href="mailto:Andrew.Sayers@kpmg.co.uk">Andrew.Sayers@kpmg.co.uk</a> .After this, if you are still dissatisfied with how your complaint has been handled you can access PSAA's complaints procedure by emailing <a href="mailto:generalenquiries@psaa.co.uk">generalenquiries@psaa.co.uk</a> by telephoning 020 7072 7445 or by writing to Public Sector Audit Appointments Limited, 3rd Floor, Local Government House, Smith Square, London, SW1P 3HZ.

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