

# The Audit Findings (ISA 260) Report for Barnsley Metropolitan Borough Council

**Year ended 31 March 2023**

**13 December 2023**



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This Audit Findings presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260. Its contents have been discussed with management and will be presented to the Audit and Governance Committee on 15 November.

## Gareth D Mills

Gareth Mills, Key Audit Partner and Engagement Lead for Barnsley Metropolitan Borough Council

For Grant Thornton UK LLP

Date: 13 December 2023

The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Council or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

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# 1. Headlines

This section summarises the key findings and other matters arising from the statutory audit of Barnsley Metropolitan Borough Council ('the Council') and the preparation of the group and Council's financial statements for the year ended 31 March 2023 for those charged with governance.

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## Financial Statements

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Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- the group and Council's financial statements give a true and fair view of the financial position of the group and Council and the group and Council's income and expenditure for the year
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

We are also required to report whether other information published together with the audited financial statements (including the Annual Governance Statement (AGS), and Narrative Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

We received the Council's draft 2022-23 accounts on 31 May 2023, in line with the statutory deadline for unaudited accounts. The Council was in a minority of c30% local authorities that managed to achieve the draft accounts deadline. This represented a good achievement by the Council, given all other competing pressures.

Our audit work was conducted as planned from July through to concluding in November. Our findings are summarised in Section Two of this report. We have not identified any audit adjustments impacting on the Council's outturn position and useable reserves.

Our work identified one material adjustment to primary financial statements in relation to valuation of Council's share of the defined benefit pension scheme (see pages 10 to 13 for further information) alongside other disclosure and presentational audit adjustments. These adjustments are detailed at Appendix D. Management has agreed and updated the financial statements to correct these misstatements.

We have raised two recommendations for management as a result of our work in the Action Plan at Appendix B. Our follow up of recommendations from the prior year are detailed at Appendix C.

Our work is now complete.

We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

We have issued a clean (unqualified) audit opinion on Council's financial statements for the year ended 31 March 2023.

We have concluded that the other information published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

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# 1. Headlines

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## Value for Money (VFM) arrangements

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Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are now required to report in more detail on the Council's overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit.

Auditors are required to report their commentary on the Council's arrangements under the following specified criteria:

- Improving economy, efficiency and effectiveness;
- Financial sustainability; and
- Governance

We have not yet completed all of our VFM work and so are not in a position to issue our Auditor's Annual Report. An audit letter explaining the reasons for the delay was sent to the Chair of the Audit and Governance Committee on 28 September and is also attached at Appendix I to this report for completeness.

We expect to issue our Auditor's Annual Report in time for the Audit and Governance Committee meeting on 24 January 2024. This is ahead of the National Audit Office's revised deadline, which requires the Auditor's Annual Report to be issued within three months after the date of the opinion on the financial statements.

As reported in our Audit Plan issued in May, we continue to assess the progress made by the Council on the key recommendation. This is in relation to the Ofsted and CQC Inspection (November 2021 report) on implementing Special Educational Needs and Disabilities (SEND) reforms in Barnsley. As you are aware, we identified this as a key recommendation issue in our 2020-21 and 2021-22 VFM work and reported this in our Auditor's Annual Report in both 2020-21 and 2021-22.

As part of our 2022-23 VFM review, which is not yet completed, we are following up Council's actions in relation to the Ofsted findings. We understand continued progress has been made in this area during 2021-22 and 2022-23. At the time of this report, we are assessing that progress made by the Council, before we conclude our 2022-23 VFM work. However, we are satisfied this issue does not impact on our 2022-23 accounts audit or opinion.

As with many other local authorities across the country, the Council is facing cost pressures resulting from increasing children services demands, inflation, interest rates, energy and pay expenditure. This is challenging on the Council's ability to deliver the agreed budgets and setting Medium Term Financial Plans. We will summarise our findings on these areas as part of our VFM work and report to you through our Auditor's Annual Report in January 2024.

Further information on our VFM work is reported at Section Three.

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## Statutory duties

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The Local Audit and Accountability Act 2014 ('the Act') also requires us to:

- report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and
- to certify the closure of the audit.

We have not exercised any of our additional statutory powers or duties.

We cannot issue our 2022-23 audit certificate at this time. Subject to the completion of our work on the Council's VFM arrangements, and our review of the Council's Whole of Government Accounts (WGA) submission, we will then be in a position to issue our audit certificate in the New Year.

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## Significant Matters

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We did not encounter any significant difficulties or identify any significant matters arising during our audit.

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## Acknowledgements

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We would like to take this opportunity to record our appreciation for the continued assistance and support provided by the finance team and other staff during our audit.

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# 2. Financial Statements

## Overview of the scope of our audit

This Audit Findings (ISA260) Report presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice (‘the Code’). Its contents have been discussed with management and will be presented to the Audit and Governance Committee on 15 November 2023.

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

## Audit approach

Our audit approach was based on a thorough understanding of the Council’s operations and is risk based, and in particular included:

- an evaluation of the Council's internal controls environment, including its IT systems and controls
- an evaluation of the components of the Group based on a measure of materiality considering each as a percentage of the Group’s gross revenue expenditure to assess the significance of each component and to determine the planned audit response. From this evaluation we determined that a targeted approach was required as part of our audit work on the following Group components; Berneslai Homes Limited (BHL) and Penistone Grammar Trust (PGT). This is consistent with our audit approach in previous years.
- Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks.

## Conclusion

Our work is now complete.

We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

We have issued a clean (unqualified) audit opinion on Council’s financial statements for the year ended 31 March 2023.

# 2. Financial Statements



## Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality levels remain the same as reported in our Audit Plan dated 23 May 2023.

We detail in the table our determination of materiality for the Council and Group.

| Materiality area  | Group Amount (£) | Council Amount (£) | Qualitative factors considered  |
|---|------------------|--------------------|---|
| Materiality for the financial statements                | 10,750k          | 10,692k            | <p>We have determined materiality at 1.5% of gross operating expenditure in net cost of services. We consider this as the most appropriate criteria given stakeholders interest in the Council delivering its budget.</p> <p>There are no changes to this benchmark that was set out in our Audit Plan dated 23 May 2023.</p> |
| Performance materiality                                 | 7,525k           | 7,484k             | Assessed to be 70% of financial statement materiality.  |
| Triviality amount                                       | 537k             | 534k               | This equates to 5% of materiality. This is our reporting threshold to the Audit and Governance Committee for any errors identified.   |
| Materiality for senior officer remuneration disclosures | -                | 15k                | <p>The senior officer remuneration disclosures in the Financial Statements have been identified as an area requiring specific materiality due to its sensitive nature.</p> <p>There are no changes to this threshold from our Audit Plan dated 23 May 2023.</p>   |



# 2. Financial Statements - Significant risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

## Risks identified in our Audit Plan

## Commentary

### Management override of controls

#### (Risk relating to the Council)

Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management over-ride of controls is present in all entities. The Authority faces external scrutiny of its spending and this could potentially place management under undue pressure in terms of how they report performance.

We therefore identified management override of control, in particular journals, management estimates and transactions outside the course of business as a significant risk, which was one of the most significant assessed risks of material misstatement.

We have:

- evaluated the design effectiveness of management controls over journals
- analysed the journals listing and determined the criteria for selecting high risk unusual journals
- tested unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration
- gained an understanding of the accounting estimates and critical judgements applied and made by management and considered their reasonableness with regard to corroborative evidence
- evaluated the rationale for any changes in accounting policies, estimates or significant unusual transactions.

Our audit work in this area did not identify any issues in respect of management override of controls.



# 2. Financial Statements - Significant risks

## Risks identified in our Audit Plan

## Commentary

### Risk of fraud in revenue recognition and expenditure

#### (Risk relating to the Council)

##### Revenue

Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.

Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Authority, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:

- there is little incentive to manipulate revenue recognition
- opportunities to manipulate revenue recognition are very limited
- the culture and ethical frameworks of local authorities, including at the Council, mean that all forms of fraud are seen as unacceptable.

##### Expenditure

Whilst not a presumed significant risk we have had regard to Practice Note 10 ( Audit of financial statements and regularity of public sector bodies in the United Kingdom). Having considered the nature of the expenditure streams at the Authority, we have determined that the risk of fraud arising from expenditure recognition can be rebutted, because:

- there is little incentive to manipulate expenditure for a Council where services are provided to the public through taxpayer's funds
- there is no significant immediate pressures on general fund reserves of the Council.

As part of our final accounts audit process, we have reconsidered our rebuttal of both revenue and expenditure recognition and consider the rebuttal is still remain appropriate. Notwithstanding that we have rebutted these risks, we have undertaken a significant level of work on the Council's revenue streams, as they are material to the financial statements audit.

As part of our audit work, we have:

##### Accounting policies and systems

- Evaluated the Council's accounting policies for recognition of income and expenditure for its material income and expenditure streams and compliance with the CIPFA Code
- Updated our understanding of the Council's business processes associated with accounting for income and expenditure.

##### Fees, Charges and other service income

- Agreed, on a sample basis, income and year end receivables from other income supporting evidence.

##### Taxation and non-specific grant income

- Income for national non-domestic rates and council tax is predictable and therefore we conducted substantive analytical procedures
- For other grants we sample tested items for supporting evidence and checked the appropriateness of the accounting treatment was in line with the CIPFA Code. Please see further reporting at pages 15 and 20.

##### Expenditure

- Agreed, on a sample basis, non pay expenditure and year end payables to supporting evidence
- Undertook detailed substantive analytical procedures on pay expenditure.

We also carried out sufficient and appropriate audit procedures to ascertain that recognition of income and expenditure was in the correct accounting period using cut off testing.

There are no issues arising that require reporting to the Audit Committee.

# 2. Financial Statements - Significant risks

## Risks identified in our Audit Plan

## Commentary

### Closing valuation of land and buildings, including Council dwellings

#### (Risk relating to the Council)

The Council re-values its land and buildings on a rolling five-yearly basis. This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved (some £1.1 billion) and the sensitivity of this estimate to changes in key assumptions.

Additionally, management will need to ensure the carrying value in the Council's financial statements is not materially different from the current value or the fair value at the financial statements date, where a rolling programme is used.

We therefore identified the closing valuation of land and buildings, including council dwellings as a significant risk, which was one of the most significant assessed risks of material misstatement.

As part of our work we have:

- evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work
- evaluated the competence, capabilities and objectivity of the valuation expert
- discussed with the valuer the basis on which the valuation was carried out
- challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding
- engaged our own auditor's expert valuer to assess the instructions issued to the Council's valuer, the Council's valuer's report and the assumptions that underpin the valuation
- tested revaluations made during the year to see if they had been input correctly into the Council's asset register
- evaluated the assumptions made by management for those assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value at year end
- considered, where the valuation date is not 31 March 2023 for assets valued in year, the arrangements management has used to ensure the valuation remains materially appropriate at 31 March 2023.

Further to issuing the draft accounts on 31 May 2023, management's valuation expert performed a further valuation of land and buildings. This valuation impacted assets valued using the Depreciated Replacement Cost (DRC) methodology. As a result of this increase in building costs the DRC asset values increased by £5.1m from £159.2m to £164.3m (c3.2% increase)

Our audit work has not identified any issues in respect of the valuation of land and buildings other than the following disclosure matter:

- Our work identified a table reconciling the gross book valuations for the last five years (in note 19) to the accounts did not agree to other land and buildings gross book value by £5m. Management agreed to correct this table to reconcile with correct gross book value. We have reported this as a disclosure adjustment at Appendix D.



# 2. Financial Statements - Significant risks

## Risks identified in our Audit Plan

### Valuation of the Authority's defined benefit pension scheme (Risk relating to the Council)

The Council's pension fund valuation represents a significant estimate in the financial statements. This is due to the size and annual fluctuations of the numbers involved (£91.1m pension asset in 2022-23 [albeit not recognised by the Authority in the draft financial statements] and a £327.4m liability in 2021-22), and the sensitivity of the estimate to changes in key assumptions.

The methods applied in the calculation of the IAS 19 estimates are routine and commonly applied by all actuarial firms in line with the requirements set out in the Code of practice for local government accounting (the applicable financial reporting framework).

However, for the first time since International Financial Reporting Standards have been adopted in the public sector, the Authority (in common with a number of local authorities in 2022-23) has had to consider the potential impact of IFRIC 14 on the Authority's IAS 19 accounting. IFRIC 14 is the accounting principle that limits the recognition of a defined benefit asset in the financial statements. As a result of this, we have assessed the recognition, valuation and disclosures of the Council's share of the pension asset as a significant risk.

The source data used by the actuaries to produce the IAS 19 estimates is provided by administering authorities and employers. We do not consider this to be a significant risk as this is verifiable.

The actuarial assumptions used are the responsibility of the Council but should be set on the advice given by the actuary. A small change in the key assumptions (discount rate, inflation rate, salary increase and life expectancy) can have a significant impact on the estimated IAS 19 liability. In particular, the discount and inflation rates, where the consulting actuary has indicated that a +0.1% - (0.1%) change in these two assumptions would have approximately 1.5% effect on the liability/asset.

We have therefore concluded that there is a significant risk of material misstatement in the IAS 19 / IFRIC 14 estimates due to the assumptions used in their calculation. With regard to these assumptions, we have therefore identified valuation of the Council's share of the South Yorkshire Pension Fund as a significant risk.

## Commentary

We have:

- updated our understanding of the processes and controls put in place by management to ensure that the Authority's share of the pension fund is not materially misstated and evaluate the design of the associated controls
- evaluated the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work
- assessed the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation
- assessed the accuracy and completeness of the information provided by the Authority to the actuary to estimate the balance
- tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary
- undertook procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report

### Auditor Commentary on Accounting for the Pension Fund Surplus/Asset in the Council's financial statements

See pages 11 -13 overleaf where this is reported. It is important to note that any potential issues or adjustments that may arise from the Council's accounting for its share of the pension fund would not result in any impact on the Council's useable reserves.

### Other work:

Our work other than the pension fund asset measurement and accounting (see page 11), has identified accounting and disclosure amendments which we have discussed with management and reported at Appendix D. The key points to note and amendments are as follows:

- Management did not initially account for the pension asset, however, some disclosures were made in the draft 2022-23 financial statements presented for audit. It is important to note that the Council's initial position was in common with a number of local authorities based on lack of technical guidance available on this new and national issue at the time of accounts preparation. We do not consider this as a deficiency in reporting estimates by Council's management in the draft financial statements given the highly unusual nature of a pension asset position and a lack of guidance on treatment on this issue when the Council was preparing its 2022-23 draft accounts.
- The draft accounts issued for audit were compiled using an earlier version of 31 March 2023 actuarial report issued in April 2023. The Council's actuaries further updated the April report and issued a latest report with appropriate assumptions in May 2023. The main changes were in respect of pension obligations, demographic and other experience pension increase assumptions. As a result of the May 2023 report, the pension obligations increased by £45.8m.
- Management has agreed to update the draft financial statements using the latest actuarial report issued in May 2023, alongside the associated disclosures. As a result, the net pension asset position was reduced by the £45.8m from £91.1m (draft accounts) to £45.3m as at 31 March 2023. See further details on page 12
- The accounting and disclosure of the overall pension asset position is reported at page 11 as this is associated with IFRIC14, which limits the recognition of a defined benefit asset in the financial statements.

# 2. Financial Statements - Significant risks

## Auditor Commentary on Accounting for the Pension Fund Surplus/Asset in the Council's financial statements

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Valuation of the Authority's defined benefit pension scheme (continued):

This section covers:

- (1) Background to the issue and relevant accounting principles
- (2) Our observations of the draft accounts and actuary reports presented for audit
- (3) Our challenges to management on the draft accounts disclosures / accounting treatment and subsequent management actions
- (4) Revised accounts – summary amendments and disclosures

### (1) Background to the issue and relevant accounting principles:

As indicated previously, for the first time since International Financial Reporting Standards (IFRS) were adopted in the public sector, the Council's net defined benefit pension fund is in a surplus or a net asset position in 2022-23, as opposed to the significant liability balance that has been reported in previous years.

According to the relevant accounting standard, IAS19 (Employee Benefits), an entity shall recognise the net defined benefit liability / asset in the statement of financial position. Therefore, whether it is a liability (which was the case in the past) or an asset, according to IAS19, it should be recognised in the balance sheet.

IAS19 states when an entity has a surplus in a defined benefit plan, it shall measure the net defined benefit asset at the lower of:

- (a) the surplus in the defined benefit plan
- (b) the asset ceiling, determined using the discount rate specified in IAS19.

The asset ceiling is defined as the present value of any economic benefits available in the form of refunds from the plan or reductions in future contributions to the plan.

IFRIC-14 (The Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction) provides guidance on amount that can be recognised in the financial statements, when there is a surplus /net asset position.

It is significantly unlikely that there will be refunds from the plan to the employer in a local government defined benefit scheme. There are no exit plans in the foreseeable future as these are public sector pension plans that would continue in perpetuity. There could be a possible situation whereby there could be potential reductions in future contributions to the plan.

The economic benefit available as a reduction in future contributions can be calculated as follows:

- present value of IAS 19 future service costs (calculated based on IAS 19 assumptions as at the balance sheet date), less
- present value of future service contributions if these are classed as a minimum funding requirement.

By doing this, the asset ceiling can be determined (point b above)

Management then needs to consider what should be recognised / disclosed in the financial statements based on accounting principles stated above.

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# 2. Financial Statements - Significant risks

## Auditor Commentary on Accounting for the Pension Fund Surplus/Asset in the Council's financial statements

### (2) Our observations of the draft accounts and actuary reports presented for audit

Our observations highlighted that:

- As indicated at page 10, the initial actuary report (issued in April 23) for 31 March 2023 was used to prepare the draft accounts. This indicated a net surplus/asset position of £91.1m. This was derived after netting off £28.8m of unfunded defined benefit obligations. Therefore, the actual funded net asset position/surplus was £119.9m (£91.1m + £28.2m). The corresponding net pension fund liability as at 31 March 2022 was £327.4m. Therefore, the total year on year fluctuation from liability to asset position was £418.5m in a 12 month period. The biggest fluctuation year-on-year was in the reduction in present value of funded defined obligations from c£1,569m to £1,154m (by c26%). The primary reason for this decrease is attributable to an increase in the discount rate from 2.7% [31.3.22] to 4.7% [31.3.23].
- Management did not account for this initial £91.1m net asset, however, some disclosures were made in the draft 2022-23 financial statements presented for audit. It is important to note that the Council's initial position was in common with a number of local authorities based on lack of technical guidance available on this new and national issue at the time of accounts preparation. We do not consider this as a deficiency in reporting estimates by Council's management in the draft financial statements.
- As indicated at page 10, the actuary updated the 31 March 2023 actuarial report with the latest assumptions and re-issued it in May 2023. Management did not have sufficient time available to incorporate these revised numbers (prior to the draft accounts submission date of 31 May 2023) and therefore used the April 2023 actuary report for the pension disclosures in the draft accounts presented for audit. According to the updated actuary report in May 2023, the revised net asset position was £45.3m. This was again derived after netting off £28.8m unfunded defined benefit obligations as in the initial report. Therefore, the actual asset position of Council's defined benefit scheme was £74.1m. (£45.3m + £28.8m). This was considered for the asset ceiling calculation, as per the accounting principles that are noted on page 11.
- As indicated above, there was an unfunded defined benefit obligation of £28.8m that has been netted off against the funded asset position in the draft account disclosures. Under IAS19, a funded asset position can only be netted off against an unfunded liability when, (a) the entity has a legally enforceable right to use a surplus in one plan to settle obligations under the other plan and (b) the entity intends to settle the obligations on a net basis or to release the surplus in one plan and settle its obligations under the other plan simultaneously. Our work indicated that none of these apply to the Council and such netting off cannot be performed. In previous years this unfunded balance had been included within the overall pension fund liability amount. With the move to a pension fund asset position this amount should have been accounted for separately as a liability on the Council's balance sheet.

### (3) Our challenges to management on the draft accounts disclosures / accounting treatment and subsequent management actions

- We challenged management on the latest Actuary report issued in May 2023. This included the updated information for the Council's 2022-23 accounts and it should be used in the revised version of accounts. Management has agreed to use the latest actuarial report in the updated financial statements.
- We challenged management on IAS19 / IFRIC14 principles as highlighted on page 11. That is, when there is a pension asset it has to be accounted for on the balance sheet and IFRIC14 has to be used to limit the recognition of that asset. Management has agreed to account for the pension surplus in the updated financial statements and limit the asset recognition using the asset ceiling principles as mentioned at page 11.
- We challenged management's actuary when the first asset ceiling calculation was made by capping the future working lifetime of the employer for a shorter period. According to IFRIC14 accounting principles, asset ceiling calculations should consider the expected life of the pension plan, in this case local government defined benefit scheme's expected lifetime. We considered the working lifetime (expected life of the plan) to be indefinite due to the nature of the pension scheme. Therefore, annuity in perpetuity should be used on determining the asset ceiling. Management agreed this and instructed the actuary to revise the asset ceiling calculation based on expected life of the pension scheme, in line with IFRIC14 principles. The revised asset ceiling calculation was obtained by management for our audit purposes. The asset ceiling is larger than the Council's share of the pension fund asset and management has agreed to recognise the lower figure of £74.1m in the revised accounts, in line with accounting principles highlighted at page 11.
- Finally, we also challenged management on netting off the unfunded defined benefit obligations of £28.8m (a liability) against the funded defined benefit asset, which reduced the actual asset surplus by £28.8m. Management agreed to disclose this at gross and account for these separately as an asset of £74.1m and a liability of £28.8m.

# 2. Financial Statements - Significant risks

## Auditor Commentary on Accounting for the Pension Fund Surplus/Asset in the Council's financial statements

### (4) Revised accounts – summary amendments and disclosures

We have summarised below the amendments made from the draft to final financial statements in relation to defined benefit asset as at 31 March 2023

- The asset ceiling is now larger than the Council's share of the pension fund asset position. Therefore, management has agreed to recognise an asset of £74.1m on the balance sheet as a long-term asset
- The unfunded defined benefit obligations of £28.8m are recognised separately as a long-term liability on the revised balance sheet
- Additional disclosures are to be made to accounting policies note to reflect IFRIC14 accounting principles
- Additional disclosures are to be made to note 37 of the financial statements, Defined Benefit Pension Scheme, using the latest actuarial report issued in May 2023.
- To confirm, there is no impact on the Council's useable reserves arising from these amendments.

Overall, this issue is an unusual national issue for 2022-23 impacting a number of local authorities for the first time, in terms of financial reporting, accounts preparation and audit. The table below provides a summary of the key points discussed on this issue.

| Accounts   | Asset recognised?  | Liability Recognised?   | Disclosures made:  |
|--|--|---|--|
| Council's 2022-23 Draft Accounts (using April 2023 Actuarial Report) | No asset recognised  | No liability recognised   | <ul style="list-style-type: none"> <li>• Yes, some disclosures were included using April 2023 actuarial report at note 37 (Defined Benefit Pension Scheme)</li> </ul>  |
| Council's 2022-23 Revised Accounts (using May 2023 Actuarial Report) | <p>Yes:</p> <ul style="list-style-type: none"> <li>• £74.1m – Long Term Asset recognised</li> <li>• Adjustment is material but does not impact on the Council's useable reserves</li> <li>• See further details reported at Appendix D.</li> </ul> | <p>Yes:</p> <ul style="list-style-type: none"> <li>• £28.8m – Long Term Liability recognised in respect of unfunded defined benefit obligations</li> <li>• Adjustment is material but does not impact on the Council's useable reserves</li> <li>• See further details reported at Appendix D.</li> </ul> | <p>Yes:</p> <ul style="list-style-type: none"> <li>• Updated note 37 disclosures based on May 2023 actuarial report</li> <li>• Updated Council's Accounting Policies note on IFRIC14</li> <li>• Disclosure amendments are significant and are reported at Appendix D.</li> </ul> |

# 2. Financial Statements: Key findings arising from the Group audit

| Component                            | Work performed  | Group audit impact and findings  |
|--------------------------------------|---|--|
| <b>Berneslai Homes Limited (BHL)</b> | <p>We adopted a targeted approach of the material balances and transactions of BHL within the Group financial statements for the year ended 31 March 2023.</p> <ul style="list-style-type: none"> <li>Our audit approach included obtaining sufficient assurances based on group materiality over material balances and transactions of BHL outside the group boundary, based on group materiality. This included the BHL pension fund asset and operating expenditure.</li> </ul>  | <p>From our work completed there are no issues to report from the consolidation of BHL into the Council's group accounts, other than some disclosure issues mainly:</p> <p>We also ensured, the challenges made at page 12 in relation to IAS19/IFRIC14 accounting principles were consistently applied in relation to pension fund valuation of BHL and reporting of group financial statements.</p> <ul style="list-style-type: none"> <li>Net asset position (c£18.9m) of the defined benefit pension scheme incorrectly reported as a long-term liability rather than a long-term asset</li> <li>BHL defined benefit pension scheme reserves in the group balance sheet shown as unusable reserves whereas a limited company this should be reported as capital and reserves.</li> </ul> <p>Management updated the accounts to correct these issues. They are also reported at Appendix D.</p> |
| <b>Penistone Grammar Trust (PGT)</b> | <p>We adopted a targeted approach of the material balances and transactions of PGT within the Group financial statements for the year ended 31 March 2023.</p> <ul style="list-style-type: none"> <li>Our audit approach included obtaining sufficient assurances based on group materiality, over material balances and transactions of PGT, outside the Group boundary. This included the PGT land and buildings and endowment funds balances and any other relevant material balances and transactions outside the Group.</li> </ul> | <p>From our work completed there are no issues to report from the consolidation of PGT into the Council's group accounts other than the following disclosure issue.</p> <ul style="list-style-type: none"> <li>PGT restricted funds are restricted to be used, therefore the reserves are useable reserves for specific purposes. This was initially incorrectly reported as unusable reserves in the group balance sheet.</li> </ul> <p>Management has updated the accounts to correct these issues. They are also reported at Appendix D.</p>  |



# 2. Financial Statements – new issues and risks

This section provides commentary on new issues and risks which were identified during the course of the audit that were not previously communicated in the Audit Plan and a summary of any significant deficiencies identified during the year.

| Issue   | Auditor commentary and view  |
|---|--|
| <p><b>IFRS 16 implementation</b></p> <p>FRAB agreed with the deferral of IFRS 16 to 2024-25. Following consultation and agreement by FRAB, the Code will provide for authorities to opt to apply IFRS 16 in advance of the revised implementation date of 1 April 2024. If management elect to implement IFRS 16 from April 2023 (early adoption) then in the 2022-23 accounts as a minimum, we expect audited bodies to disclose the title of the standard, the date of initial application and the nature of the changes in accounting policy for leases, along with the estimated impact of IFRS 16 on the accounts</p>  | <p>The Council has decided not to adopt the standard early in its financial statements. The Council has included a high level reference to IFRS16 in its accounts, Technical Annex D Accounting Standards that have been issued but have not yet been adopted.</p> <p>Management and the audit team will liaise during the 2023-24 audit to ensure the requirements of the new standard are being followed and plans are developed for IFRS 16 implementation to be adequately reported in the 2023-24 accounts and fully adopted in the 2024-25 accounts.</p>   |
| <p><b>Recognition and Presentation of Grant Income</b></p> <p>The Council receives a number of grants and contributions and is required to follow the requirements set out in sections 2.3 and 2.6 of the Code. The main considerations are to determine whether the Council is acting as principal / agent, and if there are any conditions outstanding (as distinct from restrictions) that would determine whether the grant be recognised as a receipt in advance or income.</p> <p>The Council also needs to assess whether grants are specific, and hence credited to service revenue accounts, or of a general or capital nature in which case they are credited to taxation and non-specific grant income.</p>  | <p>Note 15 to the accounts includes a detailed analysis of grant income covering grant income recognised through the Comprehensive Income and Expenditure Statement (CIES). Note 33 to the accounts includes grants and contributions received in advance. The notes provide the accounting principles supporting grant income.</p> <p>Our audit testing of grant income relating to 2022-23 has not identified any non-compliance with the requirements for grant accounting as specified in the Code. Our work involved, reviewing the Council's treatment of grants as either agent (where the Council passes on the grant without having control over its award) or principal (where the Council determines the grant award to be provided). Grant awards where the Council is acting as principal are recorded within the Council's CIES whereas grants where the Council has acted as agent are not.</p> <p>Our work also reviewed the appropriateness of the disclosures made and we undertook sample testing of a number of grants.</p> <p>No issues have been identified in recognition and presentation of Grant Income.</p> |
| <p><b>Disclosure Prior Period Adjustment (PPA) – Note 24 , Capital Financing Requirement (CFR)</b></p> <p>Our audit work highlighted that there was a brought forward difference of £23,327k in note 24, Capital Financing Requirement disclosures. It also indicated that this was a disclosure error which goes back prior to 1 April 2021. As a result, the CFR closing and opening balances did not agree to guidance issued by the Prudential Code for capital finance in local authorities (Prudential Code). The Council should follow the Prudential Code to construct and report this disclosure note.</p> <p>The presentational adjustment, which has occurred prior to 2021-22 was material. As a result, a PPA was required to correct this matter (Note 24) in line with relevant accounting principles.</p> | <p>Our further audit work in this area indicated that:</p> <ul style="list-style-type: none"><li>• This is a disclosure adjustment is within the scope of the relevant Accounting Standard for a PPA (IAS 8)</li><li>• It has no impact on brought forward reserves as at 1 April 2021 and 1 April 2022 as these are disclosure amendments only</li><li>• Required disclosures were correctly made to Note 24 (CFR) in relation to this PPA in line with IAS 8 accounting principles.</li><li>• There were no other issues in other capital financing accounting entries such as Capital Adjustment Account and Minimum Revenue Provision.</li><li>• There is no impact to the Council's brought forward reserves (usable or unusable) as at 1 April 2021 and 1 April 2022 as this was a disclosure adjustment only.</li></ul> <p>As reported at Appendix D, management has agreed to process these disclosures amendments and they will be included in the revised version of the 2022-23 accounts.</p>   |

## 2. Financial Statements – new issues and risks

This section provides commentary on new issues and risks which were identified during the course of the audit that were not previously communicated in the Audit Plan and a summary of any significant deficiencies identified during the year.

| Issue   | Auditor commentary and view   |
|---|---|
| <p><b>Measurement of Infrastructure Assets:</b></p> <ul style="list-style-type: none"><li>The Code requires infrastructure to be reported in the Balance Sheet at depreciated historical cost, that is historic cost less accumulated depreciation and impairment. Depreciation depends upon the use of appropriate useful economic lives.</li><li>The update to the Code (November 2022) provides a temporary relief from the requirement to report the gross book value and accumulated depreciation for infrastructure assets, because historical reporting practices and resulting information deficits mean that this information is unlikely to faithfully represent the asset position to the users of financial statements.</li><li>An amendment to the Local Authority Capital and Finance regulations (SI 2022 No 1232) permits Local Authorities when derecognising components of infrastructure assets, replaced by expenditure on existing assets, to determine the relevant amount to be nil.</li><li>The Council has material infrastructure assets, at net value basis, there is therefore a potential risk of material misstatement related to the infrastructure balance.</li></ul> | <p>Our audit work has not identified any issues in respect of measurement of infrastructure assets.</p>   |
| <p><b>Equal pay claims and the potential liabilities:</b></p> <ul style="list-style-type: none"><li>There have been recent publicity in local government sector where certain councils have accumulated equal pay claims. In some cases, these claims have resulted in recognising significant liabilities on the balance sheet. This has created significant financial and cashflow challenges during an economic crisis where public services have already been impacted due to increasing service demands and cost pressures.</li><li>As part of our 2022-23 audit, we inquired on such existing equal pay claims at the Council, directing our inquiries to the s151 Officer.</li><li>Our objective was to identify any unrecorded liabilities in relation to equal pay claims at the Council.</li></ul>  | <p>Our work indicated:</p> <ul style="list-style-type: none"><li>The Council settled all such claims in 2015 and there are no such existing claims from the work done by the Council</li><li>After 2015, the Council has not received notification of any potential equal pay claims through the Advisory, Conciliation, and Arbitration Service (ACAS), Early Conciliation process, through its Employment Relations Forum or through its internal grievance process</li><li>The Council has undertaken work such as job evaluation schemes to identify any such potential liabilities and none has been found.</li></ul> <p>Additionally, we have also obtained management representation on this matter – see page 22 and Appendix G for draft letter of representation.</p> |
| <p><b>IT General Controls (ITGC) work:</b></p> <p>As part of our audit procedures on the financial statements, we conducted our ITGC work. This was targeted on general IT controls and was performed by our IT specialists. The objective was to identify any significant deficiencies in IT general controls that could lead to any material errors in the financial statements.</p>  | <p>There were some recommendations arising from our IT work which have been included under Appendix C. The recommendations are primarily concerned with issues at system access level, where there are compensating controls in place to detect and reduce material errors in the financial statements.</p> <p>The audit team has considered the issues identified and do not consider them significant enough to have an impact on our audit approach (as we performed a fully substantive audit approach with no reliance on operating effectiveness of controls whether they are IT or manual). The recommendations identified by our IT audit specialists would further strengthen the Council's IT control environment when implemented.</p>                               |

# 2. Financial Statements – key judgements and estimates

This section provides commentary on key estimates and judgements inline with the enhanced requirements for auditors.

| Significant judgement or estimate  | Summary of management’s approach  | Audit Comments   | Assessment  |
|------------------------------------|---|--|---|
| Council Dwellings valuation: £850m | <p>The Council is required to revalue its Council housing in accordance with Department of Levelling up Housing and Communities (DLUHC) Stock Valuation for Resource Accounting guidance. The guidance requires the use of beacon methodology, in which a detailed valuation of representative property types is then applied to similar properties.</p> <p>The Council has engaged its valuer to complete the valuation of these properties. The Council Dwelling valuation as at 31 March 2023 was £850m, a net increase of £134.1m from 2021-22 (£715.9m).</p> | <ul style="list-style-type: none"> <li>The Council’s RICS qualified valuer has valued the entire housing stock using the beacon methodology, in which a detailed valuation of representative property types was then applied to similar properties.</li> <li>Our work indicated that this methodology was applied correctly to the 2022-23 valuation.</li> <li>We have assessed the Council’s valuer to be competent, capable and objective in carrying out the valuations</li> <li>We have carried out completeness and accuracy testing of the underlying information provided to the valuer used to determine the estimate and have no issues to report</li> <li>We have agreed the HRA valuation report to the accounts</li> <li>We have compared the valuation movements with the Gerald Eve (property valuation specialists) national report and held discussions with our own valuation specialist. We have also challenged management and the Council’s valuation expert on valuation differences identified through our sensitivity analysis work using other relevant indices.</li> </ul> <p>There are no issues arising from our work that we wish to bring to the attention of management or the Audit and Governance Committee.</p> | <p>We consider management’s process is appropriate and key assumptions are neither optimistic or cautious</p> <p><b>(Green)</b></p> |

## Assessment

- **[Red]** We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- **[Amber]** We consider the estimate is unlikely to be materially misstated however management’s estimation process contains assumptions we consider optimistic or cautious
- **[Green]** We consider management’s process is appropriate and key assumptions are neither optimistic or cautious

# 2. Financial Statements – key judgements and estimates

This section provides commentary on key estimates and judgements inline with the enhanced requirements for auditors.

| Significant judgement or estimate                      | Summary of management's approach  | Audit Comments  | Assessment   |
|--|---|---|--|
| <p>Other Land and Buildings valuation:<br/>£309.8m</p> | <p>Other land and buildings comprises £182m of specialised assets such as schools and libraries, which are required to be valued at depreciated replacement cost (DRC) at year end, reflecting the cost of a modern equivalent asset necessary to deliver the same service provision.</p> <p>The remainder of other land and buildings £127.8m are not specialised in nature (such as car parks) and are required to be valued at existing use in value (EUV) at year end.</p> <p>The Council has engaged its in-house RICS qualified valuer to complete the valuation of assets on a five yearly cyclical basis as permitted by Code of Practice on Local Authority Accounting. Approximately 90% of total other land and buildings assets (by gross value) were revalued during 2022-23.</p> <p>Management has also considered the year end value of non-revalued properties of 100 larger value land and buildings (similar approach as in previous years) and has included these in 2022-23 valuation process to gain a higher coverage of valuations.</p> <p>The total year end valuation of other land and buildings was £309.8m.</p> | <ul style="list-style-type: none"> <li>We have assessed the Council's in-house RICS qualified valuer, to be competent, capable and objective</li> <li>We have carried out completeness and accuracy testing of the underlying information provided to the valuer used to determine the estimate, including floor areas and have no issues to report</li> <li>Further to our previous year recommendations, management has changed the valuation date of revalued assets to 30 September which is closer to the year-end date than the previous date of 1 April. As reported at page 9 all DRC assets were valued up to 31 March 2023 based on Q4 indices. This is a more appropriate valuation approach</li> <li>The valuation methods remain consistent with the prior year and in line with Code guidance</li> <li>In relation to assets not revalued in the year, we have compared the Gerald Eve (valuation specialists) property valuation report and held discussions with our own, auditor's valuation specialist. We have also challenged management and the Council's valuation specialist on valuation differences identified through our sensitivity analysis work using other indices.</li> </ul> | <p>We consider management's process is appropriate and key assumptions are neither optimistic or cautious<br/><b>(Green)</b></p> |

# 2. Financial Statements - key judgements & estimates

| Significant judgement or estimate  | Summary of management's approach   | Audit Comments  | Assessment |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
|--|--|---|------------|---------------|-------------|------------|---------------|-------|-------------------|------------|-----------------------|-------|-------------------|------------|----------------------|-------|-------------------|------------|--|-----------|-------------------|------------|--|-----------|-------------------|------------|--|
| <p><b>This Year:</b><br/>Net pension Asset after adjustment (Council)<br/>£74.1m – see page 13</p> <p><b>Prior Year:</b><br/>Net pension liability £327.4m (Council)</p> | <p>Per the amended accounts (see page 13), the Council's net pension asset as at 31 March 2023 is £74.1m (PY deficit /liability £327.4) with a fluctuation of c£400m from a liability to an asset position. See further details reported at pages 10-13.</p> <p>The Council continues to engage Hymans Robertson LLP to provide actuarial valuations of the Council's assets and liabilities derived from this scheme. A full actuarial valuation is required every three years. The latest full actuarial valuation was completed as at 31 March 2022, utilising key assumptions such as life expectancy, discount rates, salary growth and pension increase rate.</p> <p>A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return.</p> <p>Given the significant value of the net pension fund asset/liability, small changes in assumptions can result in significant valuation movements. As indicated above and our reporting at pages 10-13, there has been a c£400m net actuarial gain during 2022-23. This improved position is largely a result of an increase in the discount rate in excess of the increase in the CPI inflation assumption.</p> | <p>We have:</p> <ul style="list-style-type: none"> <li>Assessed the competence, capability and objectivity of management's expert, Hymans Robertson LLP</li> <li>Assessed the actuary's approach taken and deemed it reasonable</li> <li>Used PwC as an auditor's expert to assess the management actuary and assumptions made by the actuary (see table below)</li> <li>Confirmed the completeness and accuracy of the underlying information used to determine the estimate</li> <li>Confirmed the reasonableness of the Council's share of pension assets</li> <li>Confirmed the reasonableness of the decrease in the liability estimate</li> <li>Confirmed the adequacy of the disclosure of the estimate in the financial statements.</li> </ul> <table border="1"> <thead> <tr> <th>Assumption</th> <th>Actuary Value</th> <th>* PwC range</th> <th>Assessment</th> </tr> </thead> <tbody> <tr> <td>Discount rate</td> <td>4.75%</td> <td>See comment below</td> <td>●<br/>Green</td> </tr> <tr> <td>Pension increase rate</td> <td>2.95%</td> <td>See comment below</td> <td>●<br/>Green</td> </tr> <tr> <td>Salary increase rate</td> <td>3.55%</td> <td>See comment below</td> <td>●<br/>Green</td> </tr> <tr> <td>Life expectancy – Males currently aged 45 / 65</td> <td>21.5/20.5</td> <td>See comment below</td> <td>●<br/>Green</td> </tr> <tr> <td>Life expectancy – Females currently aged 45 / 65</td> <td>25.2/23.7</td> <td>See comment below</td> <td>●<br/>Green</td> </tr> </tbody> </table> <p>*PwC has commented on the Hymans Robertson LLP (management actuary) assumptions as follows: "We are comfortable that the methodologies used by Hymans Robertson to establish assumptions will produce reasonable assumptions as at 31 March 2023 for all employers".</p> <p>Our work has not identified any evidence to conclude that management's processes and key assumptions are not appropriate. Please note this assessment is based on our discussions since the draft accounts were presented for audit (pages 11 and 12) and the adjustments made to the draft accounts as stated at page 13.</p> | Assumption | Actuary Value | * PwC range | Assessment | Discount rate | 4.75% | See comment below | ●<br>Green | Pension increase rate | 2.95% | See comment below | ●<br>Green | Salary increase rate | 3.55% | See comment below | ●<br>Green | Life expectancy – Males currently aged 45 / 65 | 21.5/20.5 | See comment below | ●<br>Green | Life expectancy – Females currently aged 45 / 65 | 25.2/23.7 | See comment below | ●<br>Green | <p>We consider management's process is appropriate (after adjustments made to the draft accounts as stated at page 13) and key assumptions are neither optimistic or cautious<br/><b>(Green)</b></p> |
| Assumption   | Actuary Value  | * PwC range   | Assessment |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
| Discount rate  | 4.75%  | See comment below   | ●<br>Green |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
| Pension increase rate  | 2.95%  | See comment below   | ●<br>Green |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
| Salary increase rate   | 3.55%  | See comment below   | ●<br>Green |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
| Life expectancy – Males currently aged 45 / 65   | 21.5/20.5  | See comment below   | ●<br>Green |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |
| Life expectancy – Females currently aged 45 / 65   | 25.2/23.7  | See comment below   | ●<br>Green |               |             |            |               |       |                   |            |                       |       |                   |            |                      |       |                   |            |  |           |                   |            |  |           |                   |            |  |



# 2. Financial Statements - key judgements and estimates

## Significant judgement or estimate

### Summary of management's approach

### Audit Comments

### Assessment

#### Grants Income:

£401m

#### Grants & Contributions received in Advance:

£31.8m

Management has taken into account three main considerations in accounting for grants:

- whether the Council is acting as the principal or agent and particularly whether it controls the goods or services before they transfer to the service recipient. Management's assessment needs to consider all relevant factors such as who bears credit risk and responsibility for any overpayments, who determines the amount, who sets the criteria for entitlement, who designs the scheme and whether there are discretionary elements.
- whether there are conditions outstanding (as distinct from restrictions) that would require the grant to be recognised as receipt in advance, otherwise grant should be recognised as income
- whether the grant is a specific or non-specific grant. General un-ringfenced grants are disclosed on the face of the CIES, whereas ringfenced grants are required to be credited to service revenue accounts.

There may be judgements over the accounting treatment. Different conclusions may be reached by the Councils depending on how they have applied any discretion in administering the schemes and application of Code guidance.

The Council receives a number of grants and contributions and is required to follow the requirements set out in the Code. The main considerations are to determine whether the Council is acting as principal or agent, and if there are any conditions outstanding (as distinct from restrictions) that would determine whether the grant be recognised as a receipt in advance or income. The Council also needs to assess whether grants are specific, and hence credited to service revenue accounts, or of a general or capital nature in which case they are credited to taxation and non-specific grant income.

As part of our audit work, we have:













- substantively tested a sample of grants across categories and reviewed management's assessment as to whether the Council is acting as the principal or agent
- for the samples selected, reviewed the completeness and accuracy of the underlying information used to determine whether there are conditions outstanding (as distinct from restrictions) that would determine whether the grant be recognised as a receipt in advance or income
- assessed for the sample of grants received, whether the grant is specific or non-specific grant (or whether it is a capital grant) – which impacts on where the grant is presented in the CIES or not
- assessed the adequacy of disclosure of grants received and judgement used by management as part of our detailed testing.

Our work has not identified any matters to report.





We consider management's process is appropriate and key assumptions are neither optimistic or cautious  
**(Green)**

## 2. Financial Statements: Information Technology

This section provides an overview of results from our assessment of Information Technology (IT) environment and controls which included identifying risks from the use of IT related to business process controls relevant to the financial audit. This includes an overall IT General Control (ITGC) rating per IT system and details of the ratings assigned to individual control areas.

| IT application                            | Level of assessment performed   | Overall ITGC rating  | ITGC control area rating   |  |  | Additional procedures carried out to address risks arising from our findings |
|---|---|--|--|--|--|--|
|   |   |  | Security management  | Technology acquisition, development and maintenance  | Technology infrastructure  |  |
| SAP reporting system                      | ITGC assessment (design and Implementation) and application controls assessment |  Green  |  Green  |  Green  |  Green  | N/A - None   |
| Northgate<br>(Revenue and benefit System) | ITGC assessment (design and Implementation) and application controls assessment |  Green  |  Green  |  Green  |  Green  | N/A None   |
| Open Housing<br>(Housing Rents System)    | ITGC assessment (design and Implementation) and application controls assessment |  Green |  Green |  Green |  Green | N/A- None  |

### Assessment

-  Significant deficiencies identified in IT controls relevant to the audit of financial statements (red)
-  Non-significant deficiencies identified in IT controls relevant to the audit of financial statements/significant deficiencies identified but with sufficient mitigation of relevant risk (amber)
-  IT controls relevant to the audit of financial statements judged to be effective at the level of testing in scope (green)
-  Not in scope for testing

## 2. Financial Statements - other communication requirements

We set out alongside details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

| Issue   | Commentary  |
|---|---|
| <b>Matters in relation to fraud</b>                               | <p>We have previously discussed the risk of fraud with the Council's Audit and Governance Committee and the Director of Finance, Chief Financial Officer.</p> <p>We have not been made aware of any significant incidents in the year and no issues have been identified during the course of our audit.</p>  |
| <b>Matters in relation to related parties</b>                     | <p>We are not aware of any related parties or related party transactions which have not been disclosed.</p>   |
| <b>Matters in relation to laws and regulations</b>                | <p>You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.</p>   |
| <b>Written representations</b>                                    | <p>The proposed letter of management representation is included at Appendix H. As highlighted at Appendix H, additional representations were obtained in relation to:</p> <ul style="list-style-type: none"> <li>(a) Life Cycle Account and the balances held in this bank account of £3.58m as at 31 March 2023 is not controlled or owned by the Council and therefore not included in the financial statements as at 31 March 2023</li> <li>(b) Equal Pay liabilities, based on the assessment and work carried out by the Council, there is no requirement to recognise any Equal Pay liabilities on the balance sheet, as at 31 March 2023.</li> </ul> |
| <b>Confirmation requests from third parties</b>                   | <p>We requested from management permission to send a confirmation request to the Council's bankers, and entities who were involved with the Council's investments and borrowings. This permission was granted and the requests were sent and responded to with positive confirmations.</p>  |
| <b>Accounting practices</b>                                       | <p>We have evaluated the appropriateness of the Council's accounting policies, accounting estimates and financial statement disclosures.</p> <p>Our review found no material omissions in the financial statements to date. Our work did identify a small number of presentational disclosure amendments (including in respect of IFRIC 14, see page 13) which have been processed by management and these are set out at Appendix E.</p>   |
| <b>Audit evidence and explanations / significant difficulties</b> | <p>As in the previous four years, we have continued to experience good co-operation and engagement from the Council throughout our 2022-23 audit.</p> <p>There are no significant difficulties to report in terms of receipt of audit evidence for all information and explanations requested.</p>  |

# 2. Financial Statements: other communication requirements



## Our responsibility

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern” (ISA (UK) 570).

| Issue         | Commentary  |
|---------------|---|
| Going concern | <p>In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.</p> <p>Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:</p> <ul style="list-style-type: none"><li>• the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the entity's services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and standardised approach for the consideration of going concern will often be appropriate for public sector entities</li><li>• for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. Our consideration of the Council's financial sustainability is addressed by our value for money work, which is covered elsewhere in this report.</li></ul> <p>Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the Council meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:</p> <ul style="list-style-type: none"><li>• the nature of the Council and the environment in which it operates</li><li>• the Council's financial reporting framework</li><li>• the Council's system of internal control for identifying events or conditions relevant to going concern</li><li>• management's going concern assessment.</li></ul> <p>On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:</p> <ul style="list-style-type: none"><li>• a material uncertainty related to going concern has not been identified</li><li>• management's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.</li></ul> |

# 2. Financial Statements - other responsibilities under the Code

| Issue  | Commentary  |
|--|---|
| <b>Other information</b>                                     | <p>We are required to give an opinion on whether the other information published together with the audited financial statements including the Annual Governance Statement and Narrative Report, is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.</p> <p>Our work noted some disclosure omissions from the Annual Governance Statement and other minor presentational matters. Our review of the Narrative report identified some minor presentational matters. These have been adequately rectified by management. These are reported at Appendix D. We plan to issue an unmodified opinion in this respect as reported at Appendix H</p> <p>Overall, no material inconsistencies have been identified.</p> |
| <b>Matters on which we report by exception</b>               | <p>We are required to report on a number of matters by exception in a number of areas:</p> <ul style="list-style-type: none"> <li>• if the Annual Governance Statement does not comply with disclosure requirements set out in CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit</li> <li>• if we have applied any of our statutory powers or duties</li> <li>• where we are not satisfied in respect of arrangements to secure value for money and have reported a significant weakness(es).</li> </ul> <p>We have nothing to report on these matters. Our Value for Money work is underway and is expected to be completed for the Audit and Governance Committee meeting on 24 January 2024.</p>  |
| <b>Specified procedures for Whole of Government Accounts</b> | <p>We are required to carry out certain procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions.</p> <p>The NAO requires the work to be completed once the audit opinion is provided on the financial statements.</p> <p>In 2022, the NAO increased the audit threshold to £2bn expenditure for authorities that required detailed WGA audit work. The NAO's 2022-23 guidance has now been issued and this threshold remains in place for 2022-23 WGA work, therefore in common with recent years, the Council WGA submission should only require limited audit input.</p> <p>We anticipate to issue this return to the NAO after issuing the audit opinion and we have targeted this for December 2023.</p>                      |
| <b>Certification of the closure of the audit</b>             | <p>As in previous years, we intend to delay the certification of the closure of the 2022-23 audit of the Council in the audit report, as detailed at Appendix I, until we have completed any required work on the WGA consolidation exercise mentioned above and completed our Value for Money responsibilities with the issue of the Auditor's Annual Report.</p>  |





# 3. Value for Money arrangements

## Approach to Value for Money work for 2022-23

The National Audit Office issued its updated guidance for auditors in January 2023. The Code requires auditors to consider whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

When reporting on these arrangements, the Code requires auditors to structure their commentary on arrangements under the three specified reporting criteria.



### Improving economy, efficiency and effectiveness

Arrangements for improving the way the body delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



### Financial Sustainability

Arrangements for ensuring the body can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3-5 years)



### Governance

Arrangements for ensuring that the body makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the body makes decisions based on appropriate information

## Potential types of recommendations

A range of different recommendations could be made following the completion of work on the body's arrangements to secure economy, efficiency and effectiveness in its use of resources, which are as follows:



### Statutory recommendation

Written recommendations to the body under Section 24 (Schedule 7) of the Local Audit and Accountability Act 2014. A recommendation under schedule 7 requires the body to discuss and respond publicly to the report.



### Key recommendation

The Code of Audit Practice requires that where auditors identify significant weaknesses in arrangements to secure value for money they should make recommendations setting out the actions that should be taken by the body. We have defined these recommendations as 'key recommendations'.



### Improvement recommendation

These recommendations, if implemented should improve the arrangements in place at the body, but are not made as a result of identifying significant weaknesses in the body's arrangements

# 3. VFM - our procedures and conclusions

We have not yet completed all of our VFM work and so are not in a position to issue our Auditor's Annual Report (AAR). An audit letter explaining the reasons for the delay was sent to Chair of the Audit and Governance Committee on 28 September and is also attached at Appendix I to this report for completeness. We expect to present our AAR on 24 January 2024 to the Audit and Governance Committee's January meeting. This would be ahead of the National Audit Office's revised deadline, which requires the AAR to be issued no more than three months after the date of the opinion on the financial statements.

As reported in our 2022-23 Audit Plan issued in May, we continue to assess the progress made by the Council on the key recommendation we raised in prior years. This is in relation to the Ofsted and CQC Inspection (November 2021 report) on implementing Special Educational Needs and Disabilities (SEND) reforms in Barnsley. We identified this as a key recommendation issue in both our 2020-21 and 2021-22 VFM work and reported this in our Auditor's Annual Reports in 2020-21 and 2021-22.

As part of our 2022-23 VFM review, which is not yet complete, we are following up the Council's actions in relation to the Ofsted/CQC findings. We understand continued progress has been made in this area during 2022-23. Our ongoing review work will assist us in concluding whether or not this matter is still a continuing significant weakness for 2022-23 before we conclude our 2022-23 VFM work.

## Implementing Special Educational Needs and Disabilities (SEND) reforms in Barnsley

### Background to this issue:

In September 2021, Ofsted and the Care Quality Commission (CQC) conducted a joint inspection of the local area of Barnsley. This was to assess the effectiveness of the borough in implementing the special educational needs and/or disabilities (SEND) reforms as set out in the Children and Families Act 2014. The inspection was led by Ofsted, supported by a team of inspectors from the CQC. The report was issued in November 2021. As a result of the findings and in accordance with the Children Act 2004 (Joint Area Reviews) Regulations 2015, Her Majesty's Chief Inspector (HMCI) determined that a Written Statement of Action (WSOA) was required because of significant areas of weakness in the borough's practices and arrangements.

HMCI also determined that the Council and the then Barnsley Clinical Commissioning Group (now within NHS South Yorkshire Integrated Care Board) were jointly responsible for submitting the written statement to Ofsted. In reaching their judgements, inspectors took account of the impact of the Covid-19 pandemic on the SEND arrangements in the borough. More detailed findings of this inspection and the full report can be obtained from Ofsted website.

As indicated earlier, we made a key recommendation on this issue in our 2020-21 and 2022-23 Auditor's Annual Report (AAR) on the Council's VFM arrangements.

Our key recommendation in 2020-21 and 2022-23 was :

- have a clear "Written Statement of Action (WSOA) in response to Ofsted and CQC report on joint area SEND inspection, which identified significant areas of weaknesses in implementing SEND reforms as set out in the Children and Families Act 2014
- a clear action plan to implement this WSOA, working with all stakeholders including parents, carers, the CCG officers, Ofsted and the CQC
- The action plan should be subject to formal monitoring and challenge by the Cabinet. Action should be taken against any elements of the action plan not implemented within the agreed timescales.

Our ongoing work to date but not yet complete, has highlighted:

- The Council produced a detailed WSOA and submitted to Ofsted and CQC in March 2022 to address the identified areas of weakness in the inspection report
- Progress on the WSoA has been reported to the Senior Management Team and the Cabinet on a regular basis and has been subject to monitoring discussion with the DfE SEND advisors who monitors the progress of SEND reforms
- Regular meetings to monitor the progress are being held with relevant stakeholders. For example, these meetings are attended by senior Directors from the Council including the Director of Children's Services, Chief Operating Officer of South Yorkshire Integrated Care Board at Place level for Barnsley, Senior Officers from NHS England SEND advisors, Department for Education (DfE) case leads for SEND, Barnsley School Alliance, and CQC and Ofsted representatives as necessary.
- We also understand the progress made in these SEND arrangements during 2021-22 and 2022-23 was also a factor for the Council successfully being granted Dedicated School Grant Funding in March 2023 by the DfE. This additional funding of £22.9m will be paid over five-year period commencing from 2022-23 to eliminate the long standing DSG deficit position at the Council, which we have reported in our previous AARs to the Audit and Governance Committee.

We will further report to you on this matter in our 22-23 AAR which we expect to issue by 24 January 2024 for the Audit and Governance Committee.

### Impact on 2022-23 Financial Statement Audit

It is important to note that our VFM risk assessment will continue until we issue our 2022-23 Auditor's Annual Report in January 2024.

Our view is there are no VFM issues that would have a material impact on our ISA(UK) audit work and therefore would not restrict us on completing the audit of the financial statements and issuing our 2022-23 audit opinion on the Council's accounts.

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# 4. Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Council's Ethical Standard and confirm that we, as a firm, and each covered person, are independent and are able to express an objective opinion on the financial statements

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged are detailed at Appendix E.

## Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details please see the Grant Thornton website.



# Independence and ethics (continued)

## Audit and non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Group. The following non-audit services were identified as well as the threats to our independence and associated safeguards that have been applied to mitigate these threats.

| Service   | Fees £  | Threats identified  | Safeguards   |
|---|---|---|--|
| <b>Audit related:</b>   |   |   |  |
| <b>Certification of Pooling Housing Capital Receipts return</b> | 7,500<br><br>(21-22 fee of 7,500 was paid during 22-23 financial year)  | Self-Interest (because this is a recurring fee)<br><br>Self review (because GT provides audit services)<br><br>Management (because the claim is agreed with management) | The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is £7,500 in comparison to the total fee for the audit of £189,968 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.<br><br>To mitigate against the self- review , self-interest and management threats, the timing of certification work is done after the audit has completed, materiality of the amounts involved to our opinion and unlikelihood of material errors arising and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.<br><br>This audit work is also no longer completed by the audit team set out on page 2, but by our separate specialist grants audit team. |
| <b>Certification of Teachers Pension Return</b>                 | 10,000<br><br>(21-22 fee of 7,500 was paid during 22-23 financial year) | Self-Interest (because this is a recurring fee)<br><br>Self review (because GT provides audit services)<br><br>Management (because the claim is agreed with management) | The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is £10,000 in comparison to the total fee for the audit of £189,968 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.<br><br>To mitigate against the self-review, self- interest and management threats, the materiality of the amounts involved are not significant to our accounts opinion, there is an unlikelihood of material errors arising, and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.<br><br>This audit work is also no longer completed by the audit team set out on page 2, but by our separate specialist grants audit team.                              |

# Independence and ethics (continued)

## Audit and non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Group. The following non-audit services were identified as well as the threats to our independence and associated safeguards that have been applied to mitigate these threats.

| Service                                       | Fees £   | Threats identified  | Safeguards   |
|---|--|---|--|
| <b>Audit related continued:</b>               |  |   |  |
| <b>Certification of Housing Benefit Claim</b> | *39,675<br><br>(21-22 fee of £44,900 was paid during 22-23 financial year) | Self-Interest (because this is a recurring fee)<br><br>Self review (because GT provides audit services)<br><br>Management (because the claim is agreed with management) | The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is *£39,675 in comparison to the total fee for the audit of £189,968 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.<br><br>To mitigate against the self-review, self-interest and management threats, the timing of certification work is done after the audit has completed, materiality of the amounts involved to our opinion and unlikelihood of material errors arising and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.<br><br>This audit work is also no longer completed by the audit team set out on page 2, but by our separate specialist grants audit team. |
| <b>Non-audit related:</b>                     |  |   |  |
| None  | -  | -   | -  |

### \* NOTE on Housing Benefit work and fees:

The £39,675 is the base fee for the 2022-23 Housing Benefit Subsidy certification

*In addition, as per prior years, for each 40+ HB testing undertaken, there will be additional fees to be raised. The value will be dependent on whether the detailed testing is performed by the Council and reperformed by us, or directly performed by Grant Thornton.*

These services are consistent with the Council's policy on the allotment of non-audit work to your auditors. All services have been approved by the Audit and Governance Committee. None of the services provided are subject to contingent fees.

# Independence and ethics (continued)

As part of our assessment of our independence we note the following matters:

| <b>Matter</b>  | <b>Conclusion</b>  |
|--|--|
| <b>Relationships with Grant Thornton</b>                 | We are not aware of any relationships between Grant Thornton and the Council that may reasonably be thought to bear on our integrity, independence and objectivity.  |
| <b>Relationships and Investments held by individuals</b> | We have not identified any potential issues in respect of personal relationships with the Council or Group.  |
| <b>Employment of Grant Thornton staff</b>                | We are not aware of any former Grant Thornton partners or staff being employed, or holding discussions in respect of employment, by the Group or Council as a director or in a senior management role covering financial, accounting or control related areas. |
| <b>Business relationships</b>                            | We have not identified any business relationships between Grant Thornton and the Council / Group.  |
| <b>Contingent fees in relation to non-audit services</b> | No contingent fee arrangements are in place for non-audit services provided.   |
| <b>Gifts and hospitality</b>                             | We have not identified any gifts or hospitality provided to, or received from, a member of the Council or Group, senior management or staff that would exceed the threshold set in the Ethical Standard.   |

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. The firm and each covered person [and network firms] have complied with the Financial Reporting Council's Ethical Standard and confirm that we are independent and are able to express an objective opinion on the financial statements.



# Appendices

- A. [Communication of audit matters to those charged with governance](#)
- B. [Action plan – Audit of Financial Statements](#)
- C. [Follow up of prior year recommendations](#)
- D. [Audit Adjustments](#)
- E. [Audit Fees and non-audit services](#)
- F. [Auditing developments](#)
- G. [Management Letter of Representation \(draft\)](#)
- H. [Audit opinion \(proposed\)](#)
- I. [Audit letter in respect of delayed VFM work](#)

# A. Communication of audit matters to those charged with governance

| Our communication plan  | Audit Plan | Audit Findings |
|---|------------|----------------|
| Respective responsibilities of auditor and management / those charged with governance   | •          |                |
| Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks  | •          |                |
| Confirmation of independence and objectivity  | •          | •              |
| A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence | •          | •              |
| Significant findings from the audit   |            | •              |
| Significant matters and issue arising during the audit and written representations that have been sought  |            | •              |
| Significant difficulties encountered during the audit   |            | •              |
| Significant deficiencies in internal control identified during the audit  |            | •              |
| Significant matters arising in connection with related parties  |            | •              |
| Identification or suspicion of fraud involving management and / or which results in material misstatement of the financial statements   |            | •              |
| Non-compliance with laws and regulations  |            | •              |
| Unadjusted misstatements and material disclosure omissions  |            | •              |
| Expected modifications to the auditor's report, or emphasis of matter   |            | •              |

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Findings (ISA260) Report, outlines those key issues, findings and other matters arising from the audit, which we consider should be communicated in writing rather than orally, together with an explanation as to how these have been resolved.

## Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

## Distribution of this Audit Findings (ISA260) Report

Whilst we seek to ensure our audit findings are distributed to those individuals charged with governance, we are also required to distribute our findings to those members of senior management with significant operational and strategic responsibilities. We are grateful for your specific consideration and onward distribution of our report to all those charged with governance.

# B. Action Plan – Audit of Financial Statements

We have identified the following recommendations for the Council as a result of issues identified during the course of our financial statement audit. We have agreed our recommendations with management and we will report on progress on this recommendation during the course of the 2023-24 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

| Assessment | Issue and risk  | Recommendations   |
|------------|---|---|
| Medium     | <p><b>1. Frequency of Heritage Assets valuations and ensuring the valuations remain appropriate:</b></p> <p>The Council holds Heritage Assets, currently reported at just over £11m as at 31 March 2023. According to the Local Government Code guidance, valuations of heritage assets can be made by any method (e.g. insurance , qualified valuer etc..) that is appropriate and relevant. There is no requirement for valuations to be carried out or verified by external valuers, nor is there any prescribed minimum period between valuations.</p> <p>However, where heritage assets are measured at valuation, the code prescribes that carrying amount shall be reviewed with sufficient frequency to ensure the valuations remain current.</p> <p>The Council’s last valuation of Heritage Assets was carried out in 2009, which was 14 years ago. Whilst we recognise there is no prescribed minimum period between valuations , we also recognise the Code guidance that valuations should be undertaken with sufficient frequency to ensure it remains reasonably current and not out of date. The risk is, reporting certain Heritage Assets at valuation method and not valuing for a significant period of time, their current value could be misstated.</p> <p>We recognise striking a reasonable balance in reviewing the valuations with sufficient frequency would be appropriate.</p> | <p><b>Recommendation</b></p> <p>We recommend the Council should consider carrying out Heritage Assets valuations with sufficient frequency, to ensure the valuations remain current – given that the previous valuation was performed in 2009.</p> <p><b>Management response – November 2023</b></p> <p><i>Agreed. Moving forwards more regular valuations will be undertaken on all heritage assets the Council owns, in line with the accounting policy for property plant and equipment. This will commence from 2023/24 where larger, higher value assets will be revalued first.</i></p> |

# B. Action Plan – Audit of Financial Statements

| Assessment    | Issue and risk  | Recommendations  |
|---------------|---|--|
| <b>Medium</b> | <p><b>Note 17 to the accounts, Related Party Transactions disclosure note:</b></p> <p>As required by International Accounting Standard 24 (IAS 24), the Council should disclose related party relationships, transactions and outstanding balances with such parties. The standard provides definitions of what constitute related parties and how those can be determined with examples.</p> <p>Once a related party to the Council is identified according to these definitions, then the above disclosures should be made on related party relationship, transactions and outstanding balances in the financial statements.</p> <p>Our audit of related party transaction disclosed at Note 17, has indicated that there are over disclosures above and beyond what is required under ISA 24. Whilst this is not impacting on our audit opinion to be given as these are over disclosures, we consider it is a best practice to minimise on such over disclosures.</p> <p>The benefit of this is reduced time on management when preparing this note, more efficient for the audit and helps to ‘declutter’ the accounts. This would still result in full compliance with the accounting standard.</p> | <p><b>Recommendation</b></p> <p>We recommend the Council revisits the related party disclosure note in the financial statements when preparing 2023-24 draft accounts and eliminate the over disclosures in this note and report in line with IAS 24 accounting principles and associated definitions.</p> <p><b>Management response – November 2023</b></p> <p><i>Agreed. The additional over disclosure information provided in the related party note was provided to aid the reader of the accounts.</i></p> <p><i>However, we acknowledge the auditors' comments and as such will discuss a more appropriate disclosure for the 2023/24 accounts.</i></p> |

# C . Follow up of prior year audit recommendations

We raised one recommendation in our 2021-22 audit of the Council's financial statements. We have followed up the progress against that recommendation below. Our previous recommendations on IT general controls as a result of work undertaken by our specialist IT audit team are followed up from pages 36 to 41.

| Assessment  | Issue and risk previously communicated  | Update on actions taken to address the issue   |
|---|---|--|
| <p><b>Now closed:</b><br/>See auditor comments in November 2023</p> | <p><b>Long Term Sustainability of the current version of the SAP reporting System:</b></p> <p>The Council has been using the SAP Reporting System as the main general ledger system for over 15 years. It is understood that the current version of the SAP reporting system has been used for a number of years by the Council.</p> <p>Our Observations:</p> <ul style="list-style-type: none"> <li>• During our work performed relating to journal testing we observed an inability to run transaction reports for all ledger codes for the purpose of our journal testing - this has not prevented us from performing our testing as we have been able to gain sufficient assurances of the ledger balance as a whole from alternative procedures. However, such procedures are excessively time consuming for both the auditor and Council staff.</li> <li>• Since the SAP system was installed over 15 years ago, the number of transactions and data which are posted to the general ledger has significantly increased. This gives rise to increased data management and security challenges to consider when obtaining the key outputs from the system.</li> <li>• The Council's current version of the SAP system does not have cloud-based functionality. This could potentially lead to loss of financial data. The current version of the system, the data is backed up onto physical hardware which may not be a sustainable option in the longer term. This leaves the Council open to potential data loss through physical damage to hardware along with increased funding requirements to maintain required hardware, to keep up with increasing demand in data storage.</li> </ul> <p>Whilst we acknowledge the current system is doing what is required, we believe, there are challenges around long- term sustainability of the current version of the SAP system that may impact the Council's financial reporting if no action is taken in the medium term.</p> | <p><b>Recommendation</b></p> <p>We recommend the Council to consider other options available on financial ledgers including consideration on a more up to date version of the SAP reporting system than the current version of SAP. This could increase efficiencies that can be gained from a general ledger system, would also assist to keep up with the increasing demand on data management and protection.</p> <p><b>Management response (November 2022):</b></p> <p><i>The Council is fully aware of the long-term sustainability of the SAP system, specifically the current version used by the Council will no longer be supported by SAP beyond 2025. With this in mind SOCITIM Advisory group have been engaged to review the options available to the Council with regards to the SAP system. A strategic drivers board has been organised and a series of operational workshops are now taking place to review the use and future requirements for the Council. Regular updates will be provided on progress to Cabinet and the Audit and Governance Committee</i></p> <p><b>Management response (May 2023):</b></p> <p><i>Work is ongoing with the SOCITIM advisory group regarding the long-term replacement of the SAP system as part of the wider digitisation and transformation programme. However, it has recently been confirmed that support to the existing version of SAP used by the Council will now be supported through to 2030.</i></p> <p><b>Auditor Comment (May 2023):</b></p> <p>Management comments (May 2023) have been noted. We will further observe this during 2022-23 accounts audit and will make our final assessment and report to you via our Audit Findings Report (ISA260), due in November 2023.</p> <p><b>Update by management (Nov 2023) :</b> <i>The Council has extended the support contract for SAP as well as entering into an external contract for adhoc support on the system. Furthermore, the Council continues to refresh the SAP system with periodic system update releases from SAP UK Ltd.</i></p> <p><i>The Council will continue to explore options for a potential replacement of SAP during the period up to 2030.</i></p> <p><b>Update by Auditor ( November 2023) :</b></p> <p>Our work to date has not identified any issues during the 2022-23 audit. However, given the significance of the SAP ledger system, we will continue to discuss developments on this matter during our regular liaison with senior management at the Council.</p> |

# C . Follow up of prior year audit recommendations -IT

Our IT specialists raised the following 11 recommendations as part of our IT audit work in 2021-22. We have followed up the progress against these recommendation at pages 36 to 41. We note that six of these recommendations have now been fully implemented and continued progress has been made on other 5 recommendations. As indicated at page 16 , these continuing recommendations are primarily concerned with weaknesses at system access level, where there are compensating controls in place to detect and reduce material errors in the financial statements.

The audit team has considered the issues identified and do not consider them significant enough to have an impact on our audit approach - as we performed a fully substantive audit approach with no reliance on operating effectiveness of controls, whether they are automated or manual. The recommendations identified by our IT audit specialists would further strengthen the Council's IT control environment when implemented.

| Implemented?                   | Issue and risk previously communicated  | Update on actions taken to address the issue   |
|--------------------------------|---|--|
| <b>X</b><br><b>(partially)</b> | <p><b>(1) Users with inappropriate debug access in the production environment (high risk)</b></p> <p>Our IT audit procedures identified user accounts that were assigned debug access in the production environment. We identified 21 user accounts with Debug access.</p> <p><b>Risk</b></p> <p>Debug access is a well-known authorization object that is deemed as sensitive. Users with this access can bypass authorizations with the debug authorization in production</p> <p>Unauthorised access to the debugger (“/h”) in SAP, could provide the users the capability of circumventing authorisation checks and allowing access to data or modification of data.</p>   | <p><b>Management response</b></p> <p>All user accounts and roles will be reviewed as a result of the findings. Work will be undertaken to identify and remove the role(s) containing the debug authorisation rights.</p> <p>The 21 user accounts identified are Internal SAP support team users, and external SAP Support team users. Changes to be implemented by January 2023.</p> <p><b>Auditor Update October 2023:</b> This issue is partially remediated as in our previous findings 21 such users found with Debug access which reduced to 10 such users in the 2022-23 finding.</p> <p><b>Management Response November 2023:</b></p> <p>The users with DEBUG access will be reviewed to ensure these are only granted to system accounts. Changes will be implemented by end of Dec 2023</p> <p>Other financial controls are also in place so that this issue has no impact on the council statutory financial accounts</p>        |
| <b>X</b>                       | <p><b>(2) Users with inappropriate access to maintain all SAP Standard or Customised tables in production (medium risk)</b></p> <p>Our IT audit procedures identified 25 Dialog user accounts that were assigned access to maintain all SAP standard or customised tables via SM30 or SM31.</p> <p>We performed further procedures to determine whether there had been changes to those tables during the audit period and observed that these users had maintained critical tables during the audit period.</p> <p><b>Risks</b></p> <p>Access to maintain all standard or customised SAP tables creates a risk that unauthorised table maintenance functions can be performed and result in data integrity issues.</p> | <p><b>Management response</b></p> <p>User accounts and roles with SM30 and SM31 access will be reviewed as a result of the findings. Roles will be amended to either remove the authorisation or amend table authorisation group restrictions.</p> <p>Changes to be implemented by March 2023.</p> <p><b>Auditor Update October 2023:</b> This issue has not been remediated and in our previous findings 25 such users that were assigned access to maintain all SAP standard or customised tables via SM30 or SM31 which has now increased to 28 such users in the 2022-23 finding.</p> <p><b>Management Response November 2023:</b></p> <p>Further role development and changes will be made to accounts with roles with SM30 and SM31 access.</p> <p>Changes will be implemented by end of Dec 2023</p> <p>Other financial controls are also in place so that this issue has no impact on the council statutory financial accounts</p> |



# C . Follow up of prior year audit recommendations -IT

## SAP general controls assessment findings

| Implemented<br>? | Issue and risk previously communicated  | Update on actions taken to address the issue   |
|------------------|---|--|
| ✓                | <p data-bbox="241 379 1346 432"><b>(3) Inappropriate segregation of duties as users have ability to configure and delete audit logs in production (medium risk)</b></p> <p data-bbox="241 448 1346 571">From our review, we identified 10 users with access to configure security audit logs via SM19. We performed a comparison of all users with the ability to configure audit logs within production via SM19 with those with the ability to re-organise or delete them in production using SM18 and we identified 7 users with both access rights.</p> <p data-bbox="241 624 309 651"><b>Risks</b></p> <p data-bbox="241 667 1346 719">Users with access to SM19 and SM18 have the ability to configure and delete audit logs on SAP. Hence, inappropriate and anomalous activity may not be detected and resolved in a timely manner.</p> | <p data-bbox="1395 347 1664 375"><b>Management response:</b></p> <p data-bbox="1395 391 2190 448">User accounts and roles with SM18 and SM19 access will be reviewed and removed as a result of the audit findings.</p> <p data-bbox="1395 480 1865 507">Changes to be implemented by March 2023.</p> <p data-bbox="1395 576 2190 687"><b>Auditor Update October 2023:</b> This issue is considered closed as we performed full privilege access testing and noted that there were no user accounts that had access to configure and reorganize / delete logs during the audit period.</p>   |
| ✓                | <p data-bbox="241 874 1346 901"><b>(4) Users with inappropriate access to directly modify SAP roles in production (medium risk)</b></p> <p data-bbox="241 917 1346 970">Our audit procedures identified 13 user accounts with access to directly modify roles in production using the PFCG transaction.</p> <p data-bbox="241 1023 309 1050"><b>Risks</b></p> <p data-bbox="241 1066 1346 1145">Access to create and modify roles directly into production creates a risk that inappropriate access within the application or underlying data may be granted without following formal user management procedures.</p>   | <p data-bbox="1395 842 1664 869"><b>Management response:</b></p> <p data-bbox="1395 885 2201 1002">Processes are followed for creating \ maintaining roles in Dev and transporting them through to the production system. However, to reduce risk we will review and remove change authorisation for PFCG in production held roles.</p> <p data-bbox="1395 1034 1865 1061">Changes to be implemented by March 2023.</p> <p data-bbox="1395 1093 2201 1203"><b>Auditor Update October 2023:</b> This issue is considered closed as we performed full privilege access testing and noted that there were no Dialog (A) and Service (S) users with access to PFCG Create or Modify transaction in production client which has logged in our Audit period.</p> |

# C . Follow up of prior year audit recommendations -IT

## SAP general controls assessment findings

| Implemented<br>? | Issue and risk previously communicated   | Update on actions taken to address the issue  |
|------------------|--|---|
| ✓                | <p><b>(5) Inadequate production client configuration settings (medium risk)</b></p> <p>Our IT audit identified that the Global System Change Option (SE06) settings are set to ‘Modifiable’ within production client. This setting allows direct changes to objects associated with ABAP software components in production.</p> <p><b>Risks</b></p> <p>If client settings are not configured to restrict direct changes to repository objects or cross client customizing objects associated with ABAP software components in production, there is a risk that there could be unauthorised changes to financially critical production data.</p>  | <p><b>Management response:</b> As a result of the audit findings, Global System Change Option (SE06) will be set to Non-Modifiable for production systems.</p> <p>Changed to be implemented by March 2023.</p> <p><b>Auditor Update October 2023:</b> This issue is considered closed as we performed full privilege access testing and found appropriate settings which were set to ‘Non-Modifiable’.</p>  |
| ✓                | <p><b>(6) Segregation of duty conflicts between change developer and implementer roles (low risk)</b></p> <p>We performed a comparison of all users with the ability to develop changes in development with those with the ability to create / import transports in production via Standard Transport Management System (STMS). We identified that there are users with both access rights. During the audit, we identified a segregation of duties conflict for 2 users who had SAP Dev SOD access.</p> <p>We performed further audit procedures to determine whether there had been transports during the audit period and noted that the above users had not created and imported transports into production.</p> <p><b>Risks</b></p> <p>The combination of access to develop and implement those changes in the production environment creates a risk that inappropriate or unauthorised changes are made to data and / or programmes.</p> | <p><b>Management response:</b></p> <p>One of the accounts is of the senior SAP Basis administrator. It was agreed to leave this role with this account due to the small size of the SAP support team. If revoked this would remove this function from anyone in the internal SAP team, and therefore the ability to either create transports or to apply them for others.</p> <p>The second account is only used by SAP’s technical support team. Therefore, as above this role will not be revoked from this account.</p> <p><b>Auditor Update October 2023:</b> This issue is considered closed as we performed full privilege access testing and noted that no users has created or imported transports into production.</p> |

# C . Follow up of prior year audit recommendations -IT

## SAP general controls assessment findings

| Implemented<br>? | Issue and risk previously communicated   | Update on actions taken to address the issue  |
|------------------|--|---|
| X                | <p data-bbox="241 379 887 408"><b>(7) Inappropriate access to transactions SM36 and SM37</b></p> <p data-bbox="241 424 1357 507">During our audit, we observed a number of user accounts with access to manage batch and background jobs for all users (via SAP t-codes SM36 / SM37 and the S_BTCH_ADM SAP authorisation object). Specifically, the following was noted:</p> <ul data-bbox="241 544 931 616" style="list-style-type: none"><li data-bbox="241 544 815 572">▪ view batch jobs: 62 users (was 38 in prior year)</li><li data-bbox="241 588 931 616">▪ create / amend batch jobs: 62 users (was 38 in prior year)</li></ul> <p data-bbox="241 635 1357 718">The users' access is restricted (via the S_BTCH_JOB SAP authorisation object) to a subset of administrator actions that cannot release or modify other users' jobs. However, the accounts can delete jobs for other SAP users including system accounts.</p> <p data-bbox="241 754 1357 863">Of the 48 users, 38 were classed as “Standard” users which means they work within the general business community, (not IT, Technical, etc). We were unable to fully identify the roles of the 38 “Standard” users with access to SM36 and SM37. We understand that some of the users work in Financial services, creating a Segregation of Duties issue.</p> <p data-bbox="241 900 1312 954">This finding was previously reported in our 2018-19 and 2019-20 review. The numbers of users with this access has decreased from 3150 to 38.</p> <p data-bbox="241 1007 300 1035"><b>Risk</b></p> <p data-bbox="241 1035 1357 1144">Access to this functionality with SAP gives users the ability to delete batch jobs owned and configured by other users. Where this ability is not appropriately restricted a risk is created that batches may not consistently run per design and that functions, including updating and processing data, may therefore not operate leading to a risk to underlying data integrity.</p> | <p data-bbox="1395 347 2186 456"><b>Management response</b> - This is still an outstanding action, and a full review of the remaining users requires further collaboration work with IT &amp; Finance to understand the roles and needs. Once established further controls can be placed to reduce the numbers where possible.</p> <p data-bbox="1395 515 2186 624"><b>Auditor Update October 2023:</b> This issue has not been remediated. We have found 62 user accounts in our 2022-23 work, with access to manage batch and background jobs for all users (via SAP t-codes SM36 / SM37 and the S_BTCH_ADM SAP authorisation object).</p> <p data-bbox="1395 683 1839 711"><b>Management Response November 2023:</b></p> <p data-bbox="1395 722 2186 777">Further role development and changes will be made to accounts with roles with SM36 and SM37 access.</p> <p data-bbox="1395 829 1924 858">Changes will be implemented by end of Dec 2023.</p> <p data-bbox="1395 911 2186 965">Other financial controls are also in place so that this issue has no impact on the council statutory financial accounts.</p> |

# C . Follow up of prior year audit recommendations -IT

## Capita Application general controls assessment findings

| Implemented<br>? | Issue and risk previously communicated  | Update on actions taken to address the issue  |
|------------------|---|---|
| ✓                | <b>(8) Inadequate control over generic privilege database accounts within Capita Academy (medium risk)</b><br><br>During our review , we noted that for the following database admin accounts , the password is not changed after each use. Further, user activity is logged, and the user can be monitored using the event log but not to the individual level who logged in: <ul style="list-style-type: none"><li>- Academy</li><li>- Aisdba</li></ul><br><b>Risks</b><br>The use of generic or shared accounts with high-level privileges increases the risk of unauthorised or inappropriate changes to the application or database. Where unauthorised activities are performed, they will not be traceable to an individual. | <b>Management response</b> - Since the audit a recent Capita Academy upgrade (October 2022) has increased login auditing. Generic account logon now also captures the specific user's domain account information. As a result, individual users can now be traced.<br><br><b>Auditor Update October 2023:</b> This issue is considered as closed, as we performed generic user testing and found user activity logged for all users at individual level as well.  |
| ✓                | <b>(9) Lack of review of audit logs in Capita Academy (low risk)</b><br><br>During our review, we noted that audit logs are maintained for Capita Academy, however, no monitoring is performed for activities performed for privileged users / failed logins.<br><br><b>Risks</b><br>Without formal and routine reviews of security event logs, inappropriate and anomalous activity (e.g., repeated invalid login attempts, unauthorised transactions) may not be detected in a timely manner. Additionally, unauthorised system configuration and data changes made using privileged accounts will go undetected by management.   | <b>Management response:</b> Capita Academy logs are collated, but only reviewed in the case of a security breach. Consideration shall be discussed with Internal Finance and IT teams to review the monitoring of these logs for unauthorised transactions.<br><br>As Capita Academy logins use Active Directory Single Sign On, Active Directory logs are of more importance for repeated invalid login attempts. See number 10 (Lack of review of audit logs in Active Directory) for further information.<br><br><b>Auditor Update October 2023:</b> This issue is considered closed as we performed full privilege access testing and no issue arising. |

# C . Follow up of prior year audit recommendations -IT

## Active Directory general controls assessment findings

Implemented

?

Issue and risk previously communicated

Update on actions taken to address the issue

X

### (10) Weak password configuration settings on Active Directory (low risk)

During our review , that the following parameters were not set in line with the password policy / requirements defined by the Council for their systems (including Active Directory):

- Account lockout threshold
- Maximum password age

Further, the following parameters were not defined/documentated in the Active Directory password policy:

- Minimum password age
- Minimum password length audit
- Store passwords using reversible encryption
- Account lockout duration
- Reset account lockout counters after

#### Risks

A lack of robust password settings may allow financial information to be compromised by unauthorised users. In particular:

- Short passwords can easily be guessed.
- If password complexity is not configured, users will tend to choose simple, guessable words as their passwords.

#### Management response:

Active Directory Password requirements are robust, but do not align to the current policy document. The password policy documentation will be updated to reflect recent minor AD policy changes.

In addition an Active Directory Password review is being undertaken, this is the result of an audit for the Council's PSN accreditation, the work will see password length's increased alongside the introduction of biometrics to unlock devices utilising Windows Hello. These changes are planned to be completed by the end of Q2 2023.

**Auditor Update October 2023:** This issue is still open with improvement opportunity and configuration remains same as we have obtained last year, there was no change in Active Directory Configurations.

**Management Response November 2023:** We are still working through deployment of Windows Hello and aim to be complete by February 2024 on all devices at which time the increase to 15-character password length and 1 year expiry will be implemented. In addition, Information Governance and Security policies will be reviewed and updated to go live on 1<sup>st</sup> April 2024

Other financial controls are also in place so that this issue has no impact on the council statutory financial accounts

X

### (11) Lack of review of audit logs in Active Directory (low risk)

During our review, we noted that there is no monitoring of activities performed for privileged users / failed logins during the audit period. Logs are only reviewed once an incident has been highlighted.

#### Risks

Without formal and routine reviews of security event logs, inappropriate and anomalous activity (e.g., repeated invalid login attempts, unauthorised transactions) may not be detected in a timely manner. Additionally, unauthorised system configuration and data changes made using privileged accounts will go undetected by management.

#### Management response

The Council is working towards the implementation of a SIEM solution that will monitor Active Directory, server logs, and monitors for correlations of misuse. The solution is based on a NCSC tool named LME, planned to be implemented by Q1 2023.

**Auditor Update October 2023:** This issue is considered with improvement opportunity and configuration remains same as we have obtained last year, there was no change in Active Directory Configurations.

**Management Response November 2023:** The previous mentioned NCSC tool named LME has not been supported so we are in the process of implementing a new tool called Wazuh as recommended by DLUHC, this will be in place by the end of 2023. The Council is currently migrating our on-premise data centre to Azure which will offer more opportunities for monitoring Active Directory moving forward.

Other financial controls are also in place so that this issue has no impact on the council statutory financial accounts.

# D. Audit Adjustments

We are required to report all non-trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

## Impact of adjusted misstatements

All adjusted misstatements are set out in detail below along with the impact on the key statements and the reported net expenditure for the year ending 31 March 2023 and the Council's useable reserves.

| Detail  | Comprehensive Income and Expenditure Statement (£)   | Statement of Financial Position (£)   | Impact on useable reserves (£)  |
|---|--|---|---|
| (1) Dr Long Term Defined Benefit Asset (Funded)   |  | 74.1m   | None  |
| Cr Long Term Defined Benefit Liability (Unfunded)   |  | 28.8m   |   |
| Cr Other Comprehensive Income & Expenditure – Actuarial gains on pension asset valuations   | 45.3m  |   | None  |
| Defined Benefit Pension Asset (Funded) and Defined Benefit Pension Liability (unfunded) amendments in line with IAS19/IFRIC14 as reported at pages 10-13  |  |   |   |
| (2) Disclosure Prior Period Adjustment (PPA) – Note 24, Capital Financing Requirement (CFR)   | N/A- disclosure misstatement only  | N/A- disclosure misstatement only   | None  |
| Our audit work highlighted that there was a brought forward difference of £23,327k in note 24, CFR disclosure note. It also indicated that this was an issue which goes back prior to 1 April 2021. As a result, the CFR closing and opening balances did not agree to guidance issued by the Prudential Code for capital finance in local authorities (Prudential Code). The Council should comply with the Prudential Code to construct this disclosure note. The issue, which has occurred prior to 2021-22 was material. As a result, a PPA was required to correct this error (Note 24) in line with relevant accounting principles. (see page 15) |  |   |   |
| <b>Overall impact</b>   | No impact to Surplus /Deficit of provision of services.<br>Impact only on <i>Other Comprehensive Income &amp; Expenditure (bottom part of the CIES) - increase by £45.3m</i> | Increase Long Term Assets by 74.1m<br>Increase Long Term Liabilities by 28.8m<br>Increase net assets by 45.3m | None – these adjustments have no impact to the useable reserves of the Council. |



# D. Audit Adjustments

We are required to report all non-trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

## Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

| No. | Adjustment Type | Description and value  | Account Balance                             | Updated in the revised accounts? |
|-----|-----------------|--|---|----------------------------------|
| 1.  | Disclosure      | <p>Expenditure and Funding Analysis (EFA):</p> <ul style="list-style-type: none"> <li>Note 1 states that the Cabinet approved a revised management structure in May 2022 but provides no details of the impact of this for this note. A brief note was added to explain the impact.</li> <li>Note 1 (2021-22 disclosures): The service descriptors used in the CIES and the EFA differ from 2021-22 due to changes in the management structure from May 2022 but there has been no amendments to the values reported for 2021-22. A note was added to explain why 2021-22 numbers were not changed mainly highlighting impracticable nature and lack of comparability to the readers of the accounts. The additional disclosures comply with the Code.</li> <li>The incorrect disclosure around prior period adjustment was removed from (section A in note 1) the note as there was no such prior period adjustment</li> <li>Reconciliation between management accounts and expenditure and funding analysis incorrectly started the reconciliation with the 2022-23 budget. This was revised to correctly start this reconciliation with 2022-23 outturn position as reported in the Narrative Report. This is a c£10m disclosure misstatement which was corrected.</li> </ul> | Note 1 - EFA                                | ✓                                |
| 2.  | Disclosure      | Annex A, the Council's Accounting Policies were updated with IFRIC14 accounting policies as reported at page 13.   | Annex A – the Council's accounting policies | ✓                                |
| 3.  | Disclosure      | Further to material amendments reported at pages 13 and 42, additional disclosures were made to note 37, Defined Benefit Pension Scheme, including IFRIC14 principles that result in the recognition of a long term asset in a funded defined benefit scheme and a long-term liability of an unfunded defined benefit scheme.  | Note 37, Defined Benefit Pension Scheme     | ✓                                |
| 4.  | Disclosure      | <p>Group Accounts:</p> <ul style="list-style-type: none"> <li>group balance sheet, Berneslai Homes Limited's (fully owned subsidiary of the Council) pension reserve (credit balance) was reported as an unusable reserve. This was corrected to be reported as a useable reserve for the for this subsidiary as a limited company</li> <li>Penistone Grammer Trust's (the other fully owned subsidiary) restricted funds was reported as unusable reserves. Considering this is still a usable reserve, the group accounts were amended to show this as a useable reserve for this Trust</li> <li>Berneslai Homes Limited's pension asset (£18.925m) was incorrectly reported as a long-term liability – this was corrected to be shown as a long-term asset rather than a negative liability</li> <li>Note G at page 121 incorrectly stated the comparators were "restated". This was corrected as there were no restatements under applicable accounting standards.</li> </ul>  | Group accounts                              | ✓                                |

# D. Audit Adjustments

## Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

| No. | Adjustment Type | Description and value   | Account Balance  | Updated in the revised accounts? |
|-----|-----------------|---|--|----------------------------------|
| 5.  | Disclosure      | As indicated at Appendix B (recommendation 2), our audit work on related party transactions at note 17 has indicated that there are over disclosures (such as disclosing profit and loss of the companies) above and beyond what is required under ISA 24. Whilst this is not impacting on our audit opinion to be given as these are over disclosures, we consider it is a best practice to minimise on such over disclosures.<br>Further to our discussions with management, some disclosures on note 17 were updated, mainly in respect of joint operations and joint ventures.<br>However, this note cleansing was not fully completed we made an action for the management for the 2023-24 financial statements as reported at Appendix B. This is to report that some (not all) were updated in the final accounts.   | Note 17 – Related Party Transactions   | ✓                                |
| 6.  | Disclosure      | Under IAS1, the Council's accounts should disclose information about the assumptions it makes about the future, and other major sources of estimation uncertainty at the end of the reporting period, that have a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities within the next financial year. In respect of those assets and liabilities, this note shall include details of:<br>(a) their nature, and (b) their carrying amount as at the end of the reporting period.<br>The draft accounts included two disclosures that were not material. Those were provisions and provisions for bad debt. These two estimates would not result in a material adjustment to the carrying amounts of assets and liabilities within the next financial year, as required by IAS1. We recommended management should consider removing these two disclosures from this note to comply with IAS1. In the revised accounts, both provisions and provisions for bad debts were removed from this note. | Key Assumptions made about the future and other major sources of estimation uncertainty, Technical Annex B | ✓                                |
| 7.  | Disclosure      | Our review of the draft Annual Governance Statement (AGS) and Narrative Report highlighted some disclosure misstatements and compliance with the relevant guidance.<br><br>These have now been updated in the final versions of the AGS and the Narrative Report, including update in respect of IAS19 adjustments as reported at page 42.  | AGS (separate document) and Narrative Report (included with the SoA)                                       | ✓                                |
| 8.  | Disclosure      | Note 8 (and accounting policy at Annex A. 6) states that exceptional items have a <i>material net effect</i> . CIES reports Household Support Grant (HSG) as an exceptional item but this has a net effect of only 257k so does not appear to meet the Council's definition for such disclosures. Further to that, Note 8 then states that no exceptional items. These conflicting statements have been removed and the disclosures have been updated to make it consistent.  | Note 8 and accounting policy at Annex A. 6   | ✓                                |
| 9.  | Disclosure      | Management removed £1.6m of balances which are not Financial Instruments (FIs) from note 27 – these were non FIs in line with Code definition.<br>Also, other minor disclosure amendments were made to ensure this note captures the FIs in line with code guidance.  | Financial Instruments, note 27   | ✓                                |

# D. Audit Adjustments

## Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

| No. | Adjustment Type | Description and value  | Account Balance   | Updated in the revised accounts? |
|-----|-----------------|--|---|----------------------------------|
| 10. | Disclosure      | Remuneration Disclosures: <ul style="list-style-type: none"> <li>We identified there were some transposition errors between Council's workings and the draft accounts in regard to the number of individuals in remuneration bands within the 'Salary only' column of the table. This was corrected.</li> <li>Added additional disclosures when individuals have left the Council with regard to Senior Executive officers.</li> </ul> | Note 13, Office's remuneration and exit packages                          | ✓                                |
| 11. | Disclosure      | The Infrastructure Asset note was expanded to fully agree with CIPFA Bulletin 12 – accounting for infrastructure assets (issued in January 2023) including a separate heading under note 19.   | Note 19, Property Plant and Equipment                                     | ✓                                |
| 12. | Disclosure      | The notes A and B (only other land and buildings disclosure ) were revised to capture increase in valuation (of c£5m) as reported at page 9.   | Housing Revenue Account , Section 6                                       | ✓                                |
| 13. | Disclosures     | Incorrect disclosures in respect of operating lease assets which are investment properties were removed as the Council has no investment properties leased out.  | Note 25 , Leases Operating Leases disclosures                             | ✓                                |
| 14. | Disclosures     | <ul style="list-style-type: none"> <li>Our work identified, a table reconciling the gross book valuations for the last five years in note 19 to the accounts did not agree to other land and buildings gross book value by £5m. Management agreed to correct this table to reconcile with correct gross book value.</li> <li>Comparative figures for 2021-22 were added to Capital Commitments note</li> </ul>                         | Note 19, Property Plant and Equipment, Land and Buildings valuation table | ✓                                |
| 15. | Disclosure      | A disclosure Prior Period Adjustment (PPA) was made as reported at page 42. Included here for completeness as this is a disclosure amendment and material.   | Note 24, Capital Financing Requirement (CFR)                              | ✓                                |
| 16. | Disclosure      | Other minor presentational adjustments were made throughout the financial statements on various pages to further improve disclosures.  | Various   | ✓                                |

# C. Audit Adjustments

## Impact of unadjusted misstatements 2022-23

The table below provides detail of one adjustment identified during the 2022-23 audit which was not made to the final set of financial statements due to its immaterial nature. This was also not corrected in South Yorkshire Pension Fund audited accounts.

| Detail  | Comprehensive Income and Expenditure Statement<br>£000 | Statement of Financial Position<br>£000 | Impact on useable reserves<br>£000 | Reason for not adjusting 2022-23 |
|---|--|---|------------------------------------|----------------------------------|
| <p>Dr Net Pension Fund Asset (Long Term Asset) £5.3m (increase the pension asset by £5.3m)</p> <p>Cr Unusable Pension Fund Reserves £5.3m (increase pension fund reserve credit balance)</p> <p>The Pension Fund auditor, as part of their audit work, did not adjust for an error in the pension asset valuation regarding stale pricing amounting to £46.4m for the fund as a whole. Applying the Council's share of fund assets of 11.6% to this indicates a misstatement of £5.3m. This is below materiality for the audit.</p> <p>If corrected, the net pension fund asset would have increased by £5.3m at the year end from £74.1m to £79.4m. Unusable Pension Fund Reserve would have increased by £5.3mm from £45.3m to £50.6m</p> <p>This unadjusted misstatement has no impact on Council's useable reserves given the pension reserve is an unusable reserve.</p> | N/A  | See detail column                       | No impact                          | Immaterial nature.               |
| <b>Overall impact</b>   | See detail column                                      | See detail column                       | <b>No impact</b>                   | <b>Immaterial nature</b>         |

# D. Audit Adjustments

## Impact of prior year unadjusted misstatements from 2021-22

The table below provides detail of one adjustment identified during the 2021-22 audit which was not made to the final set of financial statements due to its immaterial nature.

| <b>Detail</b>  | <b>Comprehensive Income and Expenditure Statement<br/>£000</b> | <b>Statement of Financial Position<br/>£000</b> | <b>Impact on useable reserves<br/>£000</b> | <b>Reason for not adjusting 2021-22</b> | <b>Update in 22-23</b>  |
|--|--|---|--|---|---|
| <p>Dr Net Pension Fund Liability (Long Term Liabilities) £3.2m (reduce the pension liability by £3.2m)</p> <p>Cr Unusable Pension Reserves £3.2m (reduce pension fund reserve debit balance)</p> <p>The Pension Fund auditor, as part of their audit work, did not adjust for an error in the pension asset valuation regarding stale pricing amounting to £27.3m for the fund as a whole. Applying the Council's share of fund assets of 11.65% to this indicates an error value of £3.2m. This is well below materiality for the audit. If corrected, the net pension fund net liability would have reduced by £3.2m at the year end. This unadjusted misstatement has no impact on Council's useable reserves given the pension reserve is an unusable reserve.</p> | N/A  | See last column                                 | No impact                                  | Immaterial nature.                      | This is incorporated in overall 2022-23 valuations of defined benefit asset and no impact to 2022-23 audit. |
| <b>Overall impact</b>  | See detail column  | See detail column                               | <b>No impact</b>                           | <b>Immaterial nature</b>                | <b>None</b>   |

# E. Audit fees and non-audit fees

We confirm below our final fees charged for the audit and provision of non-audit services.

| <b>Audit fees</b>                               | <b>Proposed fee per<br/>Audit Plan May 2023</b> | <b>Proposed<br/>Final fee</b> |
|---|---|-------------------------------|
| Council Audit (see detail breakdown at page 45) | £179,968  | £189,968                      |
| <b>Total audit fees (excluding VAT)</b>         | <b>£179,968</b>                                 | <b>**£189,968</b>             |

\*\* Given the significance of the national issue of accounting for pension fund asset valuations and IFRIC14, additional IT audit work including follow ups of last year recommendations and discussions with management, we have proposed an additional £10k from our original planned audit fee. Our work remains ongoing at the time of this report, as does work in respect of the valuation of land and buildings and pensions. We will update management and the Audit and Governance Committee, at the point we conclude our audit with our final proposed audit fee.

**Note: All variations to the scale fee (see page 45) will need to be approved by PSAA.**

Please also note that DLUHC has continued to set aside £15m of funding to deal with the expected increase in 2022-23 audit fees, a direct response to one of the key findings of the Redmond Review into local authority external audit.

| <b>Non-audit 'audit related' fees for other services:</b> | <b>Proposed fee</b> | <b>Final fee</b> |
|---|---------------------|------------------|
| Certification of Pooling Housing Capital Receipts return  | £7,500              | £7,500           |
| Certification of Teachers Pension Return                  | £10,000             | £10,000          |
| Certification of Housing Benefit Claim                    | £39,675             | *see note below  |
| <b>Total non-audit fees (excluding VAT)</b>               | <b>£57,175</b>      | <b>£57,175*</b>  |

The fees reconcile to the financial statements Note 14 - External Audit Costs.

The fees invoiced as of 16 November 2023 for the financial year 2022-23 audit, reconcile to the scale fee.

As indicated at pages 28 and 29, during 2022-23 financial year, the following amounts were paid to Grant Thornton UK LLP, in relation to 2021-22 grant certification work.

- 2021-22 Certification of Housing Benefit Claim £44,900
- 2021-22 Certification of Pooling of Housing Capital Receipts £7,500
- 2021-22 Certification of Teachers Pension Return £7,500.

**\* NOTE on Housing Benefit work and fees:**

The £39,675 is the base fee for the 2022-23 Housing Benefit Subsidy certification

In addition, as per prior years, for each 40+ HB testing undertaken, there will be additional fees to be raised. The value will be dependent on whether the detailed testing is performed by the Council and reperformed by us, or directly performed by Grant Thornton.



# E. Audit fees – detailed analysis:

|   |                 |
|---|-----------------|
| <b>PSAA Scale fee for 2022-23</b>   | <b>£120,968</b> |
| Increased challenge and depth of audit work and testing in order to meet the audit quality challenge of the regulator   | £3,750          |
| Enhanced audit procedures for Property, Plant and Equipment, including the use of an Auditor's Expert   | £5,000          |
| The revised Value for Money (VfM) approach, introduced under the new NAO Code in 2020-21 (after the 2017 PSAA tender)   | £20,000         |
| Increased audit requirements relating to ISA 540 Revised - Auditing Accounting Estimates and Related Disclosures  | £6,000          |
| Enhanced audit procedures for journals and grants testing, given the risk of management override of controls  | £5,000          |
| Enhanced audit procedures for Payroll – Change of circumstances   | £500            |
| Enhanced audit procedures for Collection Fund – reliefs testing   | £750            |
| Increased audit requirements of ISA 315 Revised - identifying and assessing the Risks of Material Misstatement  | £6,000          |
| Technical 'hot review' of the draft 2022-23 accounts given the audit sits within the FRC population of a 'major' audit  | £1,500          |
| Enhanced audit procedures for Infrastructure assets   | £2,500          |
| Additional testing within the Housing Revenue Account   | £500            |
| Additional work on 'local risks' for the audit, including the material DSG deficit on financial statements, VFM work and accounting on Safety Valve Funding. Also group accounts audit work and the IT General Controls work on SAP | £7,500          |
| Additional audit work in respect of the Group and Council's share of the Pension Fund asset position and the implications of IFRIC14, including reviews of the two actuarial reports dated April and May 2023                       | £7,500          |
| Additional follow up work across the prior year recommendations raised by our IT specialists  | £2,500          |
| <b>Total proposed audit fees 2022-23 (excluding VAT)</b>  | <b>£189,968</b> |

# F. Auditing developments

## Revised ISAs

There are changes to the following ISA (UK):

ISA (UK) 315 (Revised July 2020) 'Identifying and Assessing the Risks of Material Misstatement'

This impacts audits of financial statement for periods commencing on or after 15 December 2021.

ISA (UK) 220 (Revised July 2021) 'Quality Management for an Audit of Financial Statements'

ISA (UK) 240 (Revised May 2021) 'The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements'

A summary of the impact of the key changes on various aspects of the audit is included below:

These changes will impact audit for audits of financial statement for periods commencing on or after 15 December 2022.

| Area of change                                      | Impact of changes   |
|---|---|
| Risk assessment                                     | <p>The nature, timing and extent of audit procedures performed in support of the audit opinion may change due to clarification of:</p> <ul style="list-style-type: none"> <li>the risk assessment process, which provides the basis for the assessment of the risks of material misstatement and the design of audit procedures</li> <li>the identification and extent of work effort needed for indirect and direct controls in the system of internal control</li> <li>the controls for which design and implementation needs to be assess and how that impacts sampling</li> <li>the considerations for using automated tools and techniques.</li> </ul> |
| Direction, supervision and review of the engagement | <p>Greater responsibilities, audit procedures and actions are assigned directly to the engagement partner, resulting in increased involvement in the performance and review of audit procedures.</p>  |
| Professional scepticism                             | <p>The design, nature, timing and extent of audit procedures performed in support of the audit opinion may change due to:</p> <ul style="list-style-type: none"> <li>increased emphasis on the exercise of professional judgement and professional scepticism</li> <li>an equal focus on both corroborative and contradictory information obtained and used in generating audit evidence</li> <li>increased guidance on management and auditor bias</li> <li>additional focus on the authenticity of information used as audit evidence</li> <li>a focus on response to inquiries that appear implausible.</li> </ul>                                       |
| Definition of engagement team                       | <p>The definition of engagement team when applied in a group audit, will include both the group auditors and the component auditors. The implications of this will become clearer when the auditing standard governing special considerations for group audits is finalised. In the interim, the expectation is that this will extend a number of requirements in the standard directed at the 'engagement team' to component auditors in addition to the group auditor.</p> <ul style="list-style-type: none"> <li>Consideration is also being given to the potential impacts on confidentiality and independence.</li> </ul>                              |
| Fraud   | <p>The design, nature timing and extent of audit procedures performed in support of the audit opinion may change due to:</p> <ul style="list-style-type: none"> <li>clarification of the requirements relating to understanding fraud risk factors</li> <li>additional communications with management or those charged with governance.</li> </ul>  |
| Documentation                                       | <p>The amendments to these auditing standards will also result in additional documentation requirements to demonstrate how these requirements have been addressed.</p>  |

# G. Management Letter of Representation (draft)

**LETTER TO BE WRITTEN ON CLIENT HEADED PAPER]**

Grant Thornton UK LLP  
No 1 Whitehall Riverside  
Leeds LS1 4BN

**[Date] – {TO BE DATED SAME DATE AS DATE OF AUDIT OPINION}**

Dear Grant Thornton UK LLP

**Barnsley Metropolitan Borough Council  
Financial Statements for the year ended 31 March 2023**

This representation letter is provided in connection with the audit of the financial statements of Barnsley Metropolitan Borough Council and its subsidiary undertakings, Berneslai Homes Limited and Penistone Grammar Trust for the year ended 31 March 2023 for the purpose of expressing an opinion as to whether the group and Council financial statements are presented fairly, in all material respects in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 and applicable law

We confirm that to the best of our knowledge and belief having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

## **Financial Statements**

We have fulfilled our responsibilities for the preparation of the group and Council's financial statements in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 ("the Code"); in particular the financial statements are fairly presented in accordance therewith.

We have complied with the requirements of all statutory directions affecting the group and Council and these matters have been appropriately reflected and disclosed in the financial statements.

The Council has complied with all aspects of contractual agreements that could have a material effect on the group and Council financial statements in the event of non-compliance. There has been no non-compliance with requirements of any regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.

We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.

Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable. We are satisfied that the material judgements used in the preparation of the financial statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements. We understand our responsibilities includes identifying and considering alternative, methods, assumptions or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the estimate used. We are satisfied that the methods, the data and the significant assumptions used by us in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in accordance with the Code and adequately disclosed in the financial statements.

# G. Management Letter of Representation (draft)

We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for IAS19 Employee Benefits disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant post-employment benefits have been identified and properly accounted for.

Except as disclosed in the group and Council financial statements:

- a. there are no unrecorded liabilities, actual or contingent
- b. none of the assets of the [group and ]Council has been assigned, pledged or mortgaged
- c. there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.

Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.

All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.

We have considered the adjusted misstatements, and misclassification and disclosures changes schedules included in your Audit Findings Report. The group and Council financial statements have been amended for these misstatements, misclassifications and disclosure changes and are free of material misstatements, including omissions.

We have considered the unadjusted misstatements schedule included in your Audit Findings Report . We have not adjusted the financial statements for these misstatements brought to our attention as they are immaterial to the results of the Council and its financial position at the year-end. The financial statements are free of material misstatements, including omissions.

Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.

We have considered whether the Council is required to reflect a liability in respect of equal pay claims within its financial statements. We confirm that we are satisfied that no liability needs to be recognised on the grounds that:

- The Council settled all such claims in 2015 and there are no such existing claims from the work done by the Council
- After 2015, the Council has not received notification of any potential equal pay claims through the Advisory, Conciliation Arbitration Service (ACAS), Early Conciliation process, through it's Employment Relations Forum or through it's internal governance process
- The Council has undertaken work such as job evaluation schemes to identify any such potential liabilities and non has been found.

We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.

We have updated our going concern assessment. We continue to believe that the group and Council's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern on the grounds that :

(a) the nature of the group and Council means that, notwithstanding any intention to cease the group and Council operations in their current form, it will continue to be appropriate to adopt the going concern basis of accounting because, in such an event, services it performs can be expected to continue to be delivered by related public authorities and preparing the financial statements on a going concern basis will still provide a faithful representation of the items in the financial statements

- b. the financial reporting framework permits the entry to prepare its financial statements on the basis of the presumption set out under a) above; and
- c. the group and Council's system of internal control has not identified any events or conditions relevant to going concern

We believe that no further disclosures relating to the group and Council's ability to continue as a going concern need to be made in the financial statements

We have considered whether accounting transactions have complied with the requirements of the Local Government Housing Act 1989 in respect of the Housing Revenue Account ring-fence.

The group and Council has complied with all aspects of ring-fenced grants that could have a material effect on the group and Council's financial statements in the event of non-compliance.

We confirm that the Life Cycle Account and the balances held in this bank account as at 31 March 2023 (£3,582,344.16) is not controlled or owned by the Council and therefore not included in the financial statements as at 31 March 2023.

### **Information Provided**

We have provided you with:

- a. access to all information of which we are aware that is relevant to the preparation of the group and Council's financial statements such as records, documentation and other matters;
- b. additional information that you have requested from us for the purpose of your audit; and
- c. access to persons within the Council via remote arrangements, from whom you determined it necessary to obtain audit evidence.

We have communicated to you all deficiencies in internal control of which management is aware.

All transactions have been recorded in the accounting records and are reflected in the financial statements.

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.

We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the group and Council, and involves:

- a. management;
- b. employees who have significant roles in internal control; or
- c. others where the fraud could have a material effect on the financial statements.

We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, analysts, regulators or others.

We have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

We have disclosed to you the identity of the group and Council's related parties and all the related party relationships and transactions of which we are aware.

# G. Management Letter of Representation (draft)

We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

## Annual Governance Statement

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

## Narrative Report

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

## Approval

The approval of this letter of representation was minuted by the Council's Audit and Governance Committee at its meeting on 15 November 2023 and fully approved and signed off by the relevant members at the full Council meeting on 23 November 2023.

Yours faithfully

Name.....

Name .....

Position.....

Position .....

Date.....

Date .....

**Signed on behalf of the Council**

# H. Audit opinion (proposed and draft)

Our audit opinion is included below.

We anticipate we will provide the group and Council with an unmodified 'clean' audit report

## Independent auditor's report to the members of Barnsley Metropolitan Borough Council

### Report on the audit of the financial statements

#### Opinion on financial statements

We have audited the financial statements of Barnsley Metropolitan Borough Council (the 'Authority') and its subsidiaries (the 'group') for the year ended 31 March 2023 which comprise, the Movement in Reserves Statement, the Comprehensive Income and Expenditure Statement, the Balance Sheet, the Cash Flow Statement, Housing Revenue Account Comprehensive Income and Expenditure Statement, the Movement on the Housing Revenue Account Balance, the Collection Fund, the Group Movement in Reserves Statement, the Group Comprehensive Income and Expenditure Statement, the Group Balance Sheet and the Group Cash Flow Statement and notes to the financial statements, including a summary of significant accounting policies. The notes to the financial statements include, Notes to the core financial statements, Notes to the Housing Revenue Account, Notes to the Collection Fund, Notes to the Group Accounts Notes to the Group Accounts, Technical Annex A, comprising the Council's Accounting Policies, Technical Annex B, comprising Critical Judgements and Assumptions, Estimations made within the accounts and Technical Annex D, Accounting Standards that have been issued but have not yet been adopted. 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 2022/23.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the group and of the Authority as at 31 March 2023 and of the group's expenditure and income and the Authority's expenditure and income for the year then ended;
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

#### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the group and the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the Financial Reporting Council's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



# H. Audit opinion (proposed and draft)

## Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Director of Finance, Chief Financial Officer's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the group and the Authority's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Authority or the group to cease to continue as a going concern.

In our evaluation of the Director of Finance, Chief Financial Officer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 that the Authority's and group's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services provided by the group and the Authority. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2022) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the group and Authority and the group and Authority's disclosures over the going concern period.

In auditing the financial statements, we have concluded that the Director of Finance, 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 and the group'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 Director of Finance, Chief Financial Officer with respect to going concern are described in the relevant sections of this report.

## Other information

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

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

We have nothing to report in this regard.

## Other information we are required to report on by exception under the Code of Audit Practice

Under the Code of Audit Practice published by the National Audit Office in April 2020 on behalf of the Comptroller and Auditor General (the Code of Audit Practice) we are required to consider whether the Annual Governance Statement does not comply with 'Delivering Good Governance in Local Government Framework 2016 Edition' published by CIPFA and SOLACE, or is misleading or inconsistent with the information of which we are aware from our audit. We are not required to consider whether the Annual Governance Statement addresses all risks and controls or that risks are satisfactorily addressed by internal controls.

We have nothing to report in this regard.

# H. Audit opinion (proposed and draft)

## Opinion on other matters required by the Code of Audit Practice

In our opinion, based on the work undertaken in the course of the audit of the financial statements, the other information published together with the financial statements in the Statement of Accounts for the financial year for which the financial statements are prepared is consistent with the financial statements.

## Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- 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 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

## Responsibilities of the Authority and the Director of Finance, Chief Financial Officer

As explained more fully in the Statement of Responsibilities, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Director of Finance, Chief Financial Officer. The Director of Finance, Chief Financial 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 2022/23, for being satisfied that they give a true and fair view, and for such internal control as the Director of Finance, Chief Financial Officer determines 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 Director of Finance, Chief Financial Officer is responsible for assessing the Authority's and the group'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 they have been informed by the relevant national body of the intention to dissolve the Authority and the group without the transfer of its services to another public sector entity.

## 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. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the group and Authority and determined that the most significant which are directly relevant to specific assertions in the financial statements are those related to the reporting frameworks (the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23, the Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015 and the Local Government Act 2003, the Local Government and Housing Act 1989, the Local Government Finance Act 1988 (as amended by the Local Government Finance Act 1992) and the Local Government Finance Act 2012.

# H. Audit opinion (proposed and draft)

We enquired of management and the Audit and Governance Committee, concerning the group and Authority's policies and procedures relating to:

- the identification, evaluation and compliance with laws and regulations;
- the detection and response to the risks of fraud; and
- the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.

We enquired of management, internal audit and the Audit and Governance Committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.

We assessed the susceptibility of the Authority and group's financial statements to material misstatement, including how fraud might occur, by evaluating management's incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to:

- material closing journals posted during the preparation of the financial statements including periods 12 and 13
- material and unusual journals which fall outside the auditor's expectations which are considered as high risk journals such as journals posted by senior management, journals posted by staff not in the journals posting approval list, journals with no descriptions, journals with unusual descriptions which are outside our expectations and non-routine

Our audit procedures involved:

- evaluation of the design effectiveness of controls that management has in place to prevent and detect fraud,
- journal entry testing, with a focus on above high-risk journals
- challenging assumptions and judgements made by management in its significant accounting estimates in respect of land and buildings valuation and pension asset and liability valuation; and
- assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.

These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.

We remained alert to any indications of non-compliance with laws and regulations, including fraud, throughout the audit.

Our assessment of the appropriateness of the collective competence and capabilities of the group and Authority's engagement team included consideration of the engagement team's:

- understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation
- knowledge of the local government sector in which the group and Authority operates
- understanding of the legal and regulatory requirements specific to the Authority and group including:
  - the provisions of the applicable legislation
  - guidance issued by CIPFA/LASAAC and SOLACE
  - the applicable statutory provisions.

In assessing the potential risks of material misstatement, we obtained an understanding of:

# H. Audit opinion (proposed and draft)

- the Authority and group's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
- the Authority and group's control environment, including the policies and procedures implemented by the Authority and group to ensure compliance with the requirements of the financial reporting framework.

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

## **Report on other legal and regulatory requirements – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources**

### **Matter on which we are required to report by exception – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources**

Under the Code of Audit Practice, we are required to report to you if, in our opinion, we have not been able to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2023.

On 7 March 2022, we identified a significant weakness in the Authority's arrangements for improving economy, efficiency and effectiveness.

This was in relation to a September 2021 Ofsted and Care Quality Commission (CQC) joint inspection of the effectiveness of the Authority's implementation of the special educational needs and disabilities (SEND) reforms set out in the Children and Families Act 2014. The inspection identified significant areas of weakness in the Authority's arrangements for implementing SEND reforms. We recommended that the Authority:

- have a clear Written Statement of Action (WSOA) in response to the inspection's findings
- develop an action plan to implement their WSOA
- ensure that the action plan is subject to formal monitoring and challenge by the Authority's Cabinet.

Our work on the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources is not yet complete so we are unable to conclude whether the significant weakness identified on 7 March 2022 has been addressed. The outcome of our work will be reported in our commentary on the Authority's arrangements in our Auditor's Annual Report. If we identify any significant weaknesses in these arrangements, they will be reported by exception in a further auditor's report. We are satisfied that this work does not have a material effect on our opinion on the financial statements for the year ended 31 March 2023.

### **Responsibilities of the Authority**

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

## **Auditor's responsibilities for the review of the Authority's arrangements for securing 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 be satisfied 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.

We undertake our review in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in January 2023. This guidance sets out the arrangements that fall within the scope of 'proper arrangements'. When reporting on these arrangements, the Code of Audit Practice requires auditors to structure their commentary on arrangements under three specified reporting criteria:

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

We document our understanding of the arrangements the Authority has in place for each of these three specified reporting criteria, gathering sufficient evidence to support our risk assessment and commentary in our Auditor's Annual Report. In undertaking our work, we consider whether there is evidence to suggest that there are significant weaknesses in arrangements.

## **Report on other legal and regulatory requirements – Delay in certification of completion of the audit**

We cannot formally conclude the audit and issue an audit certificate for Barnsley Metropolitan Borough Council for the year ended 31 March 2023 in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice until we have completed:

- our work on the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources
- the work necessary to issue our Whole of Government Accounts (WGA) Component Assurance statement for the Authority for the year ended 31 March 2023.

We are satisfied that this work does not have a material effect on the financial statements for the year ended 31 March 2023.

### **Use of our report**

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 [and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited]. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

**Signature: To be signed**

**Gareth Mills, Key Audit Partner**

for and on behalf of Grant Thornton UK LLP, Local Auditor

**Leeds**

**Date: TBC**

# I. Audit letter in respect of delayed VFM work

[This letter was issued on 28 September 2023 to the Chair of the Audit and Governance Committee and copied below for reference]

Councillor Phillip Lofts  
Chair of Audit and Governance Committee  
Barnsley Metropolitan Borough Council  
PO Box 634  
Barnsley  
S70 9GG

**28 September 2023**

Dear Cllr Lofts,

The original expectation under the approach to VFM arrangements work set out in the 2020 Code of Audit Practice was that auditors would follow an annual cycle of work, with more timely reporting on VFM arrangements, including issuing their commentary on VFM arrangements for local government by 30 September each year at the latest. Unfortunately, as in the prior year, due to the on-going challenges impacting on the local audit market, including the need to meet regulatory and other professional requirements, we have been unable to complete our work as quickly as would normally be expected.

The National Audit Office has updated its guidance to auditors to allow us to postpone completion of our work on arrangements to secure value for money and focus our resources firstly on the delivery of our opinions on the financial statements. This is intended to help ensure as many opinions on the financial statements as possible could be issued in line with national timetables and legislation.

As a result, we have therefore not yet issued our Auditor's Annual Report, including our commentary on arrangements to secure value for money. We now expect to publish our report no later than end of January 2024 to coincide with the January meeting of the Audit and Governance Committee. This would be well within the NAO's timeframe of completing our VFM audit work within three months of issuing our opinion on the Council's accounts.

For the purposes of compliance with the 2020 Code, this letter constitutes the required audit letter explaining the reasons for delay.

Yours faithfully

**Gareth**

Gareth Mills  
Key Audit Partner and Engagement Lead for Barnsley Metropolitan Borough Council

