

Horsham District Council Audit Results Report

Year ended 31 March 2022
July 2023

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

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*Horsham District Council
Chart Way
Horsham
RH12 1RL*

3 July 2023

Dear Audit Committee Members

We are pleased to attach our final Audit Results Report for the forthcoming meeting of the Audit Committee, summarising the status of our audit and findings to date. We will update the Audit Committee at its meeting scheduled for 12 July 2023 on further progress to that date and explain the remaining steps to the issue of our final opinion. This report updates the previous version of the report presented to the Audit Committee on 29 March 2023.

The audit is designed to express an opinion on the 21/22 financial statements and address current statutory and regulatory requirements. This report contains our findings related to the areas of audit emphasis, our views on Horsham District Council's accounting policies and judgements and material internal control findings. Each year sees further enhancements to the level of audit challenge and the quality of evidence required to achieve the robust professional scepticism that society expects. We thank the management team for supporting this process.

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

We welcome the opportunity to discuss the contents of this report with you at the Audit Committee meeting on 12 July 2023.

*Elizabeth Jackson
Partner*

For and on behalf of Ernst & Young LLP

Encl

Contents



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

The “Terms of Appointment and further guidance (updated July 2021)” issued by the PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and in legislation, and covers matters of practice and procedure which are of a recurring nature.

This report is made solely to the Audit Committee and management of Horsham District Council in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit Committee, and management of Horsham District Council those matters we are required to state to them in this report and for no other purpose. To the **fullest** extent permitted by law we do not accept or assume responsibility to anyone other than the Audit Committee and management of Horsham District Council for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.



01

Executive Summary



Executive Summary

Scope update

In our audit planning report presented at the 29 April 2022 Audit Committee meeting, we provided you with an overview of our audit scope and approach for the audit of the financial statements. Below we have highlighted the changes to that scope:

Changes in materiality

We updated our planning materiality assessment using the draft results and have also reconsidered our risk assessment. Based on our materiality measure of gross expenditure on provision of services, we have updated our overall materiality assessment to £1.45m (Audit Planning Report – £1.50m). This results in updated performance materiality, at 75% of overall materiality, of £1.07m, and an updated threshold for reporting uncorrected misstatements of £71,225.

We also identified areas where misstatement at a lower level than our overall materiality level might influence the reader and developed an audit strategy specific to these areas, including:

- ▶ *Remuneration disclosures including any severance payments, exit packages and termination benefits. We audit these fully given their inherent sensitive nature.*
- ▶ *Related party transactions. We consider any related parties in terms of the underlying relationship and potential influence, and not simply the overall values disclosed.*

Status of the audit

Our audit of Horsham District Council for the year ended 31 March 2022 is substantially complete at the time of writing this report. We will provide an update on the status of the audit at the 12 July meeting. Until work is complete, further amendments may arise:

- ▶ *Final memo from EYRE review concluding their work on sample of investment property valuations;*
- ▶ *Completion of the additional work arising from the updated IAS19 valuation report based on the new triennial valuation as at 31st March 2022 (see details set out in section 02);*
- ▶ *Final engagement partner review of the file;*
- ▶ *Completion of subsequent events review;*
- ▶ *Review of final version signed Statement of Accounts; and*
- ▶ *Receipt of the signed management representation letter.*

Audit differences

In the work completed to date, we have identified two adjusted differences relating to the pension fund asset and the National Non-Domestic Rate creditors. Full details are available in section 04. We have also identified a small number of disclosure amendments that have been made to the final version of the accounts.

Since our last reporting in March 2023, we have identified two uncorrected misstatements in the accounts that management has declined to amend. The details of the differences are set out in section 04.



Executive Summary

Auditor responsibilities under the new Code of Audit Practice 2020

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

The specified reporting criteria are:

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

Status of the audit – Value for Money

We have completed our value for money (VFM) risk assessment and not identified any risk of significant weakness against the three reporting criteria we are required to consider under the NAO's 2020 Code. We have revisited our assessment as part of our completion of the audit of the financial statements and remain satisfied that we have not identified a risk of significant weakness. This risk assessment will remain in progress until we are in a position to sign the audit report and will report any risks identified to you.

As a result of the work completed for our planned VFM procedures, we have no matters to report by exception in the auditor's report (see Section 03). We plan to issue the VFM commentary as part of issuing the Auditor's Annual Report within 3 months of issuing the audit report.



Executive Summary

Other reporting issues

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

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of the financial statements audit and provide an update to the Committee following completion of this work. We have received the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission for 2021/22 and the Council remains below the reporting threshold.

We have no other matters to report.

Areas of audit focus

Our Audit Planning Report identified key areas of focus for our audit of the Council's financial statements. This report sets out our observations and conclusions, including our views on areas which might be conservative, and where there is potential risk and exposure. We summarise our consideration of these matters, and any others identified, in the "Key Audit Issues" section of this report.

We ask you to review these and any other matters in this report to ensure:

- There are no other considerations or matters that could have an impact on these issues*
- You agree with the resolution of the issue*
- There are no other significant issues to be considered.*

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

Control observations

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

However, we have identified one deficiency in the Council's ability to obtain information in relation to some of its investment properties to support the valuation. See Section 07 for further details.

Independence

We have no issues to report.

Please refer to Section 08 for our update on Independence.



02

Areas of Audit Focus



Significant risk

Misstatements due to fraud or error *

What is the risk?

The financial statements as a whole are not free of material misstatements whether caused by fraud or error.

As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.

What judgements are we focused on?

As part of our work we focused the key judgemental areas of financial statements, such as accounting policies, the model applied to the minimum revenue provision and unusual transactions.

We reviewed accounting estimates for evidence of management bias, and specifically focused on the following:

- *IAS 19 disclosures;*
- *NDR appeals provision; and*
- *Valuation of land and buildings in Property, Plant and Equipment and Investment Properties.*

What did we do?

We have performed the procedures described in our original audit plan. Please see the following page for full details.

What are our conclusions?

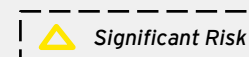
Our work in relation to this risk is ongoing at the time of writing this report as the membership data testing for the triennial valuation to support the revised IAS19 report is in progress at West Sussex Pension Fund. However, this is unlikely to lead to any reporting issues for this risk as the testing does not relate to management bias.

Our audit work found no evidence that management had attempted to override internal controls.

We have not identified any instances of inappropriate judgements being applied.

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

This conclusion is based on detailed testing of accounts entries susceptible to potential manipulation.





Significant risk



Further details on procedures/work performed

We identified the key fraud risks at the planning stage of the audit and considered the effectiveness of management's controls that are designed to address the risk of fraud. We updated our understanding of the risks of fraud and the controls put in place to address them and made enquiries of Internal Audit, management and those charged with governance to support our understanding.

We have:

- Inquired of management about risks of fraud and the controls put in place to address those risks.*
- Understood the oversight given by those charged with governance of management's processes over fraud.*
- Considered of the effectiveness of management's controls designed to address the risk of fraud.*

Performed mandatory procedures regardless of specifically identified fraud risks, including:

- Reviewed the appropriateness of journal entries recorded in the general ledger, and other adjustments made in the preparation of the financial statements.*
- Reviewed, discussed with management and challenged any accounting estimates on revenue or expenditure recognition for evidence of bias, specifically:*
 - IAS 19 disclosures;*
 - NDR appeals provision; and*
 - Valuation of land and buildings in Property, Plant and Equipment and Investment Properties.*

We found that the valuation method for each of the above has not changed from prior years.

- Reviewed the transactions in the financial statements for evidence of any significant unusual transactions.*

- In addition to our overall response, we considered where these risks may present themselves and identified a separate fraud risk related to the capitalisation of revenue expenditure as set out on the next slide.*



Significant risk

Risk of fraud in revenue recognition - inappropriate capitalisation of revenue expenditure *

What is the risk?

Under ISA 240 there is a presumed risk that revenue may be misstated due to improper revenue recognition. In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.

From our risk assessment, we have assessed that the risk manifests itself solely through the inappropriate capitalisation of revenue expenditure to improve the financial position of the general fund.

Capitalised revenue expenditure can be funded through borrowing with only minimal Minimum Revenue Provision charges recorded in the general fund, deferring the expenditure for 30+ years when the borrowing is repaid.

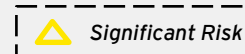
What did we do?

Our approach focused on:

- ▶ *For significant additions we examined invoices, capital expenditure authorisations, leases and other data that support the additions. We reviewed the sample selected against the definition of capital expenditure in IAS 16*
- ▶ *We extended our testing of items capitalised in the year by lowering our testing threshold. We will also review a larger random sample of capital additions below our testing threshold*
- ▶ *Journal testing - we used our testing of Journals to identify high risk transactions, such as items originally recorded as revenue expenditure and subsequently capitalised.*

What are our conclusions?

We are satisfied that capital additions made in the year met the requirements of IAS 16, and had been correctly capitalised.





Significant risk

Valuation of Property, including investment property

What is the risk?

The Council holds a significant investment in retail property. The valuation of property is complex and subject to several assumptions and judgements. A small movement in these assumptions can have a material impact on the financial statements.

Difficulties in the retails sector have led to many retailers, including well-known names, closing stores, going into administration, or otherwise looking to reduce their rental costs by renegotiating existing leases.

These difficulties have had a direct impact on the value of the retail units (high street shops, out of town retail parks and shopping centres) leased to retailers.

What did we do?

We have:

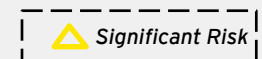
- *Considered the work performed by the Council's valuer, this included a review of the adequacy of the scope of the work performed, their professional capabilities and the results of their work;*
- *Sample tested key asset information used by the valuer in performing their valuation (e.g. floor plans to support valuations based on price per square metre);*
- *instructed our own Property valuation team (EY Real Estates) to review a sample of property valuations performed by the Councils Valuer*
- *Consider the annual cycle of valuations to ensure that assets have been valued within a 5 year rolling programme as required by the Code for PPE.*
- *Reviewed assets not subject to valuation in 2021/22 to confirm that the remaining asset base is not materially misstated;*
- *Considered changes to useful economic lives as a result of the most recent valuation; and*
- *Tested accounting entries have been correctly processed in the financial statements;*

What are our conclusions?

The work of our specialist (EY Real Estates) has been completed although we are waiting for the final version of their memo. We have had a number of meetings with the Council's valuer and officers to discuss the valuation of two investment properties selected for testing. We had not been able to obtain sufficient information initially about the valuation inputs of these assets.

For one of the assets, Swan Walk, the valuation was not updated for 2021/22 due to the timing of information provided by the management agent. This valuation has been reassessed by the Council's valuer and an amendment is needed to the Accounts before the audit report can be issued.

We are satisfied that the valuation of the assets are materially fairly stated.





Other risk

Pension asset valuation

What is the risk?

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

The Council's pension fund asset is a material estimated balance and the Code requires that this asset be disclosed on the Council's balance sheet. At 31 March 2022 this totalled £31,006k.

The information disclosed is based on the IAS 19 report issued to the Council by the actuary to the County Council. Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

What did we do?

We have:

- Liaised with the auditors of West Sussex Pension Fund to obtain assurances over the information supplied to the actuary in relation to West Sussex County Council.*
- Assess the work of the Pension Fund actuary (Hymans Robertson) including the assumptions they have used by relying on the work of PWC - Consulting Actuaries commissioned by Public Sector Auditor Appointments for all Local Government sector auditors, and considering any relevant reviews by the EY actuarial team.*
- Review and test the accounting entries and disclosures made within the Council's financial statements in relation to IAS19; and*
- Reviewed the Council's calculation of the impact of the 'McCloud' and 'Goodwin' judgement noting that the post balance sheet events did not have a material impact on the pension liability and therefore are not required to be disclosed as post balance sheet event.*

What are our conclusions?

We identified that the pension asset value at 31 March 2022 used by the actuary in their report was overstated by £280k in the draft accounts. Management agreed to amend the accounts for this misstatement.

However, due to the audit being unsigned at the end of March 2023, the Council obtained an updated IAS19 valuation report based on the triennial valuation at 31 March 2022. This reported an understatement of £830k of the pension asset value.

As a result of the two misstatements, the net adjustment to pension asset in the final version accounts was an increase of £549k. Management has corrected this misstatement.

As at July 2023, our membership data testing at the West Sussex Pension Fund (WSPF) is still in progress. The revised IAS19 valuation report includes a material increase in the 'Other Experiences' figure provided by the actuary which forms part of the overall Pension Asset valuation figure included in the accounts. The reason for the increase is difficult to quantify and audit so we are placing reliance on the work at WSPF to obtain assurance for issuing the audit report.



Other risk

Accounting for Covid business grants

What is the risk?

Central Government have provided a number of new and different Covid-19 related grants to local authorities during the year. There are also funds that have been provided for the Council to disseminate to other bodies. Whilst there is no change in the CIPFA Code or accounting standard (IFRS 15) in respect of accounting for grant funding, the emergency nature of some of the grants received and in some cases the lack of clarity on any associated restrictions and conditions, means that the Council will need to apply a greater degree of assessment and judgement to determine the appropriate accounting treatment in the 2021/22 statements. The Council needs to assess whether it is acting as a principal or agent, with the accounting to follow that decision. For those where the decision is a principal, it also needs to assess whether there are any initial conditions that may also affect the recognition of the grants as revenue during 2021/22.

What did we do?

We have:

- Reviewed the Council's decision for new grant or funding arrangements whether it is acting as principal or agent;
- Reviewed whether any initial conditions are attached to grants impacting their recognition;
- Assessed whether the accounting appropriately follows those judgements; and
- Checked the Council has adequately disclosed grant income received in the year, under both principal and agent arrangements.

What are our conclusions?

We are satisfied that officers have appropriately accounted for and disclosed Covid Business grants received in year.



03 Audit Report



Audit Report

Draft audit report – example only

Note this is an illustrative draft of the audit report

Our opinion on the financial statements

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF HORSHAM DISTRICT COUNCIL

Opinion

We have audited the financial statements of Horsham District Council for the year ended 31 March 2022 under the Local Audit and Accountability Act 2014. The financial statements comprise the:

- Movement in Reserves Statement,
- Comprehensive Income and Expenditure Statement,
- Balance Sheet,
- Cash Flow Statement,
- and the related notes 1 to 32.
- Collection Fund and the related notes 1 to 3

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 2021/22.

In our opinion the financial statements:

- give a true and fair view of the financial position of Horsham District Council as at 31 March 2022 and of its expenditure and income for the year then ended; and
- have been prepared properly in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report below. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard and the Comptroller and Auditor General's (C&AG) AGN01, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that Director of Corporate Resource's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the authority's ability to continue as a going concern for a period 12 months from when the financial statements are authorised for issue.

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

Other information

The other information comprises the information included in the Statement of Accounts for the Financial Year 2021/22, other than the financial statements and our auditor's report thereon. The Director of Corporate Resources 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 this report, we do not express any form of assurance conclusion thereon.

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

We have nothing to report in this regard.



Draft audit report - example only

Our opinion on the financial statements

Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Council;
- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014;
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014.
- we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2022

We have nothing to report in these respects.

Responsibility of the Director of Corporate Resources

As explained more fully in the Statement of the Director of Corporate Resources Responsibilities set out on page 9, the Director of Corporate Resources 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 2021/22, and for being satisfied that they give a true and fair view and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error

In preparing the financial statements, the Director of Corporate Resources is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the

going concern basis of accounting unless the Authority either intends to cease operations, or have no realistic alternative but to do so.

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

Auditor's responsibilities for the audit of the financial statements

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

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

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the entity and management.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the council and determined that the most significant are:

- Local Government Act 1972,
- Local Government Finance Act 1988 (as amended by the Local Government Finance Act 1992),
- Local Government Act 2003,



Draft audit report - example only

Our opinion on the financial statements

- *The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 as amended in 2018 and 2020,*
- *Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (SI 2010/948)*
- *The Local Audit and Accountability Act 2014, and*
- *The Accounts and Audit Regulations 2015.*

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

We understood how Horsham District Council is complying with those frameworks by understanding the incentive, opportunities and motives for non-compliance, including inquiring of management, head of internal audit and those charged with governance and obtaining and reading documentation relating to the procedures in place to identify, evaluate and comply with laws and regulations, and whether they are aware of instances of non-compliance. We corroborated this through our reading of the Council's committee minutes, through enquiry of employees to confirm Council policies, and through the inspection of employee handbooks and other information.

Based on this understanding we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures had a focus on compliance with the accounting framework through obtaining sufficient audit evidence in line with the level of risk identified and with relevant legislation.

We assessed the susceptibility of the Council's financial statements to material misstatement, including how fraud might occur by understanding the potential incentives and pressures for management to manipulate the financial statements, and performed procedures to understand the areas in which this would most likely arise.

Based on our risk assessment procedures, we identified inappropriate capitalisation of revenue expenditure, Risk of fraud in revenue recognition - sales, fees and charges income grant and management override of controls to be our fraud risks.

To address our fraud risk of inappropriate capitalisation of revenue expenditure we tested the Council's capitalised expenditure to ensure the capitalisation criteria were properly met and the expenditure was genuine.

To address our fraud risk of fraud in revenue recognition - sales, fees and charges income grant we assessed whether the grant return appropriately followed the guidance, and whether the values included in the return were supported by relevant and appropriate evidence .

To address our fraud risk of management override of controls, we tested specific journal entries identified by applying risk criteria to the entire population of journals. For each journal selected, we tested specific transactions back to source documentation to confirm that the journals were authorised and accounted for appropriately.

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

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

We have undertaken our review in accordance with the Code of Audit Practice 2020, having regard to the guidance on the specified reporting criteria issued by the Comptroller and Auditor General in December 2021, as to whether Horsham District Council had proper arrangements for financial sustainability, governance and improving economy, efficiency and effectiveness. The Comptroller and Auditor General determined these criteria as those necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether Horsham District Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2022.

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

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



Audit Report

Draft audit report - example only

Our opinion on the financial statements

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

Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate until we have completed the work necessary to issue our assurance statement in respect of the Authority's Whole of Government Accounts consolidation pack. We are satisfied that this work does not have a material effect on the financial statements or on our value for money conclusion.

Use of our report

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

Elizabeth Jackson (Key Audit Partner)

Ernst & Young LLP (Local Auditor)

Luton

Date



04

Audit Differences



Audit Differences

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

Summary of adjusted differences

We report to you any misstatements greater than our nominal value of £73,000.

We identified two adjustments that have been made to the accounts:

- The pension asset value at 31 March 2022 used by the actuary in their report was overstated. The effect of this was to decrease the pension asset by £280k. Following the initial work the Council needed to obtain a revised IAS19 report which identified an understatement of £830k based on the triennial valuation as at 31 March 2022. As a result, the net adjustment to the pension asset is a £549k increase; and*
- The National Non-Domestic Rates creditor did not reconcile to the Collection Fund. The effect was to understate creditors and overstate the NDR income by £105k.*

We have no other corrected misstatements to report to you at the date of this report. We have identified a small number of disclosure amendments that have been made to the final version accounts. These include amendments to the following notes: Pensions; Financial Instruments; and Leases. None of the amendments required need to be individually reported to you.

Summary of unadjusted differences

We have identified two uncorrected misstatements in the accounts that management has declined to amend.

1) Our PPE valuation work identified that there was a difference between the WHE valuations and our recalculations due to the location factor changing from 1.08 in December 2021 to 1.11 in March 2022. The Council has determined that this doesn't lead to a material misstatement in the accounts. The location factor error impacts on the Council's assets valued using Depreciated Replacement Cost. We have assessed the potential judgemental error in the accounts and the maximum misstatement would be £1.055m. This is an estimation technique so we have concluded this as reasonable.

2) An updated property valuation was obtained from WHE for Swan Walk and supplied to our EY Real Estate team, but no adjustment was made for the new valuation in the financial statements. The difference between the old and new valuations is £98k.



05

Value for Money Risks





Value for money

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

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

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

Risk assessment

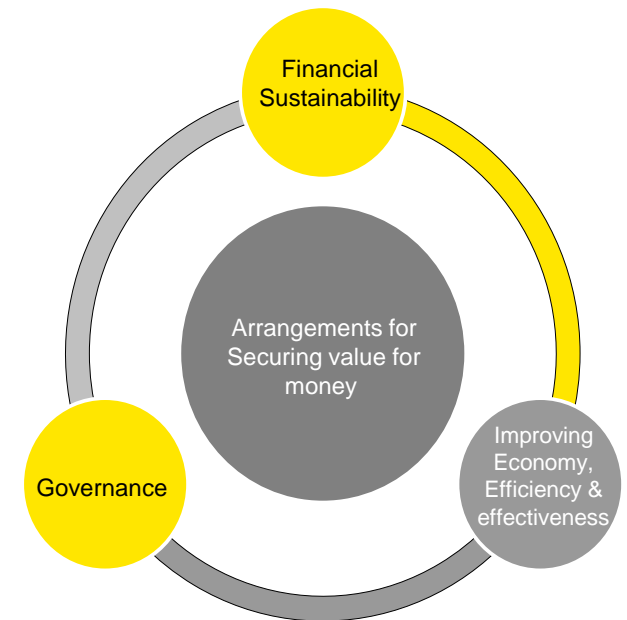
We have previously reported to the Committee the outcome of our assessment of the risk of significant weaknesses in the Council's VFM arrangements - that we had not identified any risks. We have revisited our risk assessment and have not identified any new risks for 2021/22.

The risk assessment will remain in progress until we are in a position to sign the audit report and will report any new risks identified to you.

Status of our VFM work

We have completed our planned VFM procedures at the date of drafting this report and have no matters to report by exception in the auditor's report (see Section 03).

We plan to issue the VFM commentary as part of issuing the Auditor's Annual Report within three months of issuing the audit report.





06 Other reporting issues



Other reporting issues

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

We must give an opinion on the consistency of the financial and non-financial information in the Statement of Accounts 2021/22 with the audited financial statements.

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

Financial information in the Narrative Statement in the Statement of Accounts 2021/22 and published with the financial statements was consistent with the audited financial statements.

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

Whole of Government Accounts

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

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of the financial statements audit and provide an update to the Committee following completion of this work. We have received the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission for 2021/22 and the Council remains below the reporting threshold.

Other powers and duties

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

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

Other matters

We have no other matters to report.



07

Assessment of Control Environment



Assessment of Control Environment

Financial controls

Under ISA (UK&I) 265 it is mandatory to communicate significant deficiencies in internal control in writing to any audit client.

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

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

Although our audit was not designed to express an opinion on the effectiveness of internal control we are required to communicate to you significant deficiencies in internal control.

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

However, we would like to bring an internal control deficiency to your attention:

- Access to information held by management agents of the Council's investment properties - the Council needs to ensure that it has access to all information in a timely manner from the management agents of its investment properties. The difficulty in obtaining information has led to a likely misstatement in the valuation of one of the investment properties as at 31 March 2022. Due to the complexities of valuing this type of asset, the Council should review its access to information and strengthen arrangements with the management agents to ensure the draft accounts are based on the most up to date information. The valuation of these assets requires the valuation inputs to be verified to source data and we are not currently able to do this as we have been unable to obtain tenancy agreements and lettings information. We do however note the Council is a minority stakeholder in this arrangement, holding 15.5% of the investment, which increases the difficulty of holding the management company accountable for supplying the required information.*



08

Independence

Confirmation and analysis of Audit fees

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

There are no relationships from 01 April 2021 to the date of this report, which we consider may reasonably be thought to bear on our independence and objectivity.

As at the date of this report, there are no future services which have been contracted and no written proposal to provide non-audit services has been submitted.

We confirm that we have not undertaken non-audit work.

As part of our reporting on our independence, we set out below a summary of the fees you have paid us in the year ended 31 March 2022.

	Planned fee 2021/22	Scale fee 2021/22	Final Fee 2020/21
	£	£	£
Total Fee - Code work	38,572	38,572	38,572
Additional fee determined by PSAA (1)	TBC	-	24,460
Total audit fee	TBC	38,572	63,032

Note:

- As detailed in our 2020/21 Auditor's Annual Report we submitted a proposed rebasing of the scale fee. PSAA have now determined this fee for 2020/21. We will be submitting scale fee rebasing for 2021/22 following the conclusion of the audit. We requested an additional fee of £38,200 and PSAA determined that £24,460 could be invoiced in relation to this.

We will determine an additional fee for the 2021/22 audit once the audit work is complete and discuss this with management before submitting to PSAA for approval.

All fees exclude VAT.

Other communications

EY Transparency Report 2022

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

Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the year end 30 June 2022:

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







09





Appendices

Required communications with the Audit Committee



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

 Our Reporting to you		
Required communications	 What is reported?	  When and where
Terms of engagement	Confirmation by the Audit Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies.
Our responsibilities	Reminder of our responsibilities as set out in the engagement letter.	Audit planning report - April 2022
Planning and audit approach	Communication of the planned scope and timing of the audit, any limitations and the significant risks identified.	Audit planning report - April 2022
Significant findings from the audit	<ul style="list-style-type: none"> • Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures • Significant difficulties, if any, encountered during the audit • Significant matters, if any, arising from the audit that were discussed with management • Written representations that we are seeking • Expected modifications to the audit report • Other matters if any, significant to the oversight of the financial reporting process 	Audit planning report - April 2022





Appendix A

		 Our Reporting to you
Required communications	 What is reported?	  When and where
<i>Going concern</i>	<p><i>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</i></p> <ul style="list-style-type: none"> • <i>Whether the events or conditions constitute a material uncertainty</i> • <i>Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</i> • <i>The adequacy of related disclosures in the financial statements</i> 	<i>No conditions or events were identified, either individually or together to raise any doubt about Horsham District Council's ability to continue for the 12 months from the date of our report</i>
<i>Misstatements</i>	<ul style="list-style-type: none"> • <i>Uncorrected misstatements and their effect on our audit opinion</i> • <i>The effect of uncorrected misstatements related to prior periods</i> • <i>A request that any uncorrected misstatement be corrected</i> • <i>Material misstatements corrected by management</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Subsequent events</i>	<ul style="list-style-type: none"> • <i>Enquiry of the audit committee where appropriate regarding whether any subsequent events have occurred that might affect the financial statements.</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Fraud</i>	<ul style="list-style-type: none"> • <i>Enquiries of the Audit Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the Council</i> • <i>Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</i> • <i>Unless all of those charged with governance are involved in managing the Council, any identified or suspected fraud involving:</i> <ul style="list-style-type: none"> • <i>Management;</i> • <i>Employees who have significant roles in internal control; or</i> • <i>Others where the fraud results in a material misstatement in the financial statements.</i> • <i>The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</i> • <i>Any other matters related to fraud, relevant to Audit Committee responsibility.</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>




Appendix A

		 Our Reporting to you
Required communications	What is reported?	 When and where
<i>Related parties</i>	<p><i>Significant matters arising during the audit in connection with the Council's related parties including, when applicable:</i></p> <ul style="list-style-type: none"> • <i>Non-disclosure by management</i> • <i>Inappropriate authorisation and approval of transactions</i> • <i>Disagreement over disclosures</i> • <i>Non-compliance with laws and regulations</i> • <i>Difficulty in identifying the party that ultimately controls the Council</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Independence</i>	<p><i>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence.</i></p> <p><i>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</i></p> <ul style="list-style-type: none"> • <i>The principal threats</i> • <i>Safeguards adopted and their effectiveness</i> • <i>An overall assessment of threats and safeguards</i> • <i>Information about the general policies and process within the firm to maintain objectivity and independence</i> <p><i>Communications whenever significant judgments are made about threats to objectivity and independence and the appropriateness of safeguards put in place.</i></p>	<i>Audit planning report - April 2022 and Audit results report - December 2022, March 2023 and July 2023</i>
<i>External confirmations</i>	<ul style="list-style-type: none"> • <i>Management's refusal for us to request confirmations</i> • <i>Inability to obtain relevant and reliable audit evidence from other procedures.</i> 	<i>We have received all requested confirmations</i>
<i>Consideration of laws and regulations</i>	<ul style="list-style-type: none"> • <i>Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</i> • <i>Enquiry of the audit committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the audit committee may be aware of</i> 	<i>We have asked management and those charged with governance. We have not identified any material instances or non-compliance with laws and regulations</i>

Appendix A

		 Our Reporting to you
Required communications	 What is reported?	  When and where
<i>Significant deficiencies in internal controls identified during the audit</i>	<ul style="list-style-type: none"> • <i>Significant deficiencies in internal controls identified during the audit.</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Consideration of laws and regulations</i>	<ul style="list-style-type: none"> • <i>Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</i> • <i>Enquiry of the audit committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the audit committee may be aware of</i> 	<i>We have asked management and those charged with governance. We have not identified any material instances or non-compliance with laws and regulations</i>
<i>Significant deficiencies in internal controls identified during the audit</i>	<ul style="list-style-type: none"> • <i>Significant deficiencies in internal controls identified during the audit.</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Written representations we are requesting from management and/or those charged with governance</i>	<ul style="list-style-type: none"> • <i>Written representations we are requesting from management and/or those charged with governance</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</i>	<ul style="list-style-type: none"> • <i>Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>

Appendix A

		 Our Reporting to you
Required communications	 What is reported?	 When and where
<i>Auditors report</i>	<ul style="list-style-type: none"> • <i>Any circumstances identified that affect the form and content of our auditor's report</i> 	<i>Audit results report - December 2022, March 2023 and July 2023</i>
<i>Fee Reporting</i>	<ul style="list-style-type: none"> • <i>Breakdown of fee information when the audit planning report is agreed</i> • <i>Breakdown of fee information at the completion of the audit</i> • <i>Any non-audit work</i> 	<i>Audit planning report - April 2022 and Audit results report - December 2022, March 2023 and July 2023</i>
<i>Certification work</i>	<ul style="list-style-type: none"> • <i>Summary of certification work</i> 	<i>Certification Report (if required)</i>

Management representation letter

Management Rep Letter

Elizabeth Jackson
Ernst & Young LLP
400 Capability Green
Luton
LU1 3LU

This letter of representations is provided in connection with your audit of the financial statements of Horsham District Council (“the Council”) for the year ended 31 March 2022. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the financial statements give a true and fair view of the Council financial position of Horsham District Council as of 31 March 2022 and of its income and expenditure for the year then ended in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22

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

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

A. Financial Statements and Financial Records

- 1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.*

- 2. We acknowledge, as members of management of the Council, our responsibility for the fair presentation of the financial statements. We believe the financial statements referred to above give a true and fair view of the financial position, financial performance (or results of operations) and cash flows of the Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22, and are free of material misstatements, including omissions. We have approved the financial statements.*
- 3. The significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.*
- 4. As members of management of the Council, we believe that the Council has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22, that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls.*
- 5. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. We have not corrected these differences identified by and brought to the attention from the auditor because [\[reasons to be specified in signed letter\]](#).*

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

- 1. We acknowledge that we are responsible to determine that the Council's activities are conducted in accordance with laws and regulations and that we are responsible to identify and address any non-compliance with applicable laws and regulations, including fraud.*
- 2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.*
- 3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.*

Management representation letter

Management Rep Letter

4. *We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Council (regardless of the source or form and including without limitation, any allegations by “whistleblowers”), including non-compliance matters:*

C. Information Provided and Completeness of Information and Transactions

1. *We have provided you with:*

- *Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;*
- *Additional information that you have requested from us for the purpose of the audit; and*
- *Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.*

2. *All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the financial statements, including those related to the COVID-19 pandemic.*

3. *We have made available to you all minutes of the meetings of the Council, Cabinet and Audit Committee held through the year to the most recent meeting on the following date: 7 December 2022.*

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

5. *We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22.*

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

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

D. Liabilities and Contingencies

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

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

3. *We have recorded and/or disclosed, as appropriate, all liabilities related litigation and claims, both actual and contingent, and have disclosed in Note 31 to the financial statements all guarantees that we have given to third parties*

Management representation letter

Management Rep Letter

E. Going Concern

1. *Note 32 to the financial statements discloses all the matters of which we are aware that are relevant to the Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans*

F. Subsequent Events

1. *There have been no events, including events related to the COVID-19 pandemic, subsequent to period end which require adjustment of or disclosure in the financial statements or notes thereto.*

G. Other information

1. *We acknowledge our responsibility for the preparation of the other information. The other information comprises the Narrative Report.*
2. *We confirm that the content contained within the other information is consistent with the financial statements.*

H. other information

1. *We acknowledge our responsibility for the preparation of the other information. The other information comprises of the Narrative Statement*
2. *We confirm that the content contained within the other information is consistent with the financial statements.*

I. Use of the Work of a Specialist

1. *We agree with the findings of the specialists that we engaged to evaluate the valuation of land and buildings and investment property, in the calculation of the NDR appeals provision, in generating the IAS19 pension and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.*

J. Estimates

1. *We confirm that the significant judgments made in making the valuation of land and buildings and investment property, in the calculation of the NDR appeals provision, and in generating the IAS19 pension ("the accounting estimates") have taken into account all relevant information and the effects of the COVID-19 pandemic of which we are aware.*
2. *We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied or used in making the accounting estimates.*
3. *We confirm that the significant assumptions used in making the accounting estimate appropriately reflect our intent and ability to carry out the specific courses of action on behalf of the entity.*
4. *We confirm that the disclosures made in the financial statements with respect to the accounting estimate(s), including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22*
5. *We confirm that appropriate specialized skills or expertise has been applied in making the accounting estimates.*
6. *We confirm that no adjustments are required to the accounting estimates and disclosures in the financial statements, including due to the COVID-19 pandemic.*

K. Retirement benefits

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

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ED None

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