

# Peterborough City Council

Annual Audit Letter for the year  
ended 31 March 2018

30 August 2018



Building a better  
working world

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Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website ([www.psa.co.uk](http://www.psa.co.uk))

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

The 'Terms of Appointment (updated 23 February 2017)' issued by PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Annual Audit Letter is prepared in the context of the Statement of responsibilities. It is addressed to the Members of the Peterborough City Council, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

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



# 01 Executive Summary

## Executive Summary

We are required to issue an annual audit letter to Peterborough City Council following completion of our audit procedures for the year ended 31 March 2018. Below are the results and conclusions on the significant areas of the audit process.

Area of Work	Conclusion
<b>Opinion on the Council's :</b> ▶ Financial statements	Unqualified - the financial statements give a true and fair view of the financial position of the Council as at 31 March 2018 and of its expenditure and income for the year then ended
▶ Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts.
<b>Concluding on the Council's arrangements for securing economy, efficiency and effectiveness</b>	We concluded that you have put in place proper arrangements to secure value for money in your use of resources

Area of Work	Conclusion
<b>Reports by exception:</b>	
▶ Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the Council
▶ Public interest report	We had no matters to report in the public interest.
▶ Written recommendations to the Council, which should be copied to the Secretary of State	We had no matters to report.
▶ Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report.

Area of Work	Conclusion
<b>Reporting to the National Audit Office (NAO) on our review of the Council's Whole of Government Accounts return (WGA).</b>	We had no matters to report.

## Executive Summary (cont'd)

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As a result of the above we have also:

Area of Work	Conclusion
Issued a report to those charged with governance of the Council communicating significant findings resulting from our audit.	Our Audit Results Report was issued on 4 July 2018
Issued a certificate that we have completed the audit in accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	Our certificate was issued on 30 August 2018

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### Fees

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Throughout the year we have engaged early and effectively with the finance team on matters relating to the Council's accounts. The finance team have been very receptive to our engagement and we have valued their openness. The finance team prepared the accounts in line with the earlier deadlines and generally working papers were of a good quality. However we were required to input additional and unplanned time to complete our procedures as a result of the late valuation of PPE issue and some weaknesses in supporting working papers for grants and payroll. As a result we have agreed an additional fee with the Section 151 Officer which we outline in Section 7.

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In December 2018 we will also issue a report to those charged with governance of the Council summarising the certification work we have undertaken. We would like to take this opportunity to thank the Council's staff for their assistance during the course of our work.

Suresh Patel

Associate Partner

For and on behalf of Ernst & Young LLP





## 02 Purpose and Responsibilities



# Purpose and Responsibilities

## The Purpose of this Letter

The purpose of this annual audit letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the Council.

We have already reported the detailed findings from our audit work in our 2017/18 Audit Results Report to the 16 July 2018 Audit Committee, representing those charged with governance. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the Council.

## Responsibilities of the Appointed Auditor

Our 2017/18 audit work has been undertaken in accordance with the Audit Plan that we issued on 12 February 2018 and is conducted in accordance with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK and Ireland), and other guidance issued by the National Audit Office.

As auditors we are responsible for:

- ▶ Expressing an opinion:
  - ▶ On the 2017/18 financial statements; and on the consistency of other information published with the financial statements.
- ▶ Forming a conclusion on the arrangements the Council has to secure economy, efficiency and effectiveness in its use of resources.
- ▶ Reporting by exception:
  - ▶ If the annual governance statement is misleading or not consistent with our understanding of the Council;
  - ▶ Any significant matters that are in the public interest;
  - ▶ Any written recommendations to the Council, which should be copied to the Secretary of State; and
  - ▶ If we have discharged our duties and responsibilities as established by thy Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the National Audit Office (NAO) on your Whole of Government Accounts return. We completed our procedures in August and found that the return was consistent with the audited accounts.

## Responsibilities of the Council

The Council is responsible for preparing and publishing its statement of accounts accompanied by an Annual Governance Statement (AGS). In the AGS, the Council reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The Council is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.



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# Financial Statement Audit



# Financial Statement Audit

## Key Issues

The Council's Statement of Accounts is an important tool for the Council to show how it has used public money and how it can demonstrate its financial management and financial health.

We audited the Council's Statement of Accounts in line with the NAO's 2015 Code of Audit Practice, International Standards on Auditing (UK and Ireland), and other guidance issued by the NAO and issued an unqualified audit report on 31 July 2018.

Our detailed findings were reported to the 16 July 2018 Audit Committee.

The key issues identified as part of our audit were as follows:

Significant Risk	Conclusion
<p data-bbox="40 730 69 770">33</p> <p data-bbox="91 663 815 695"><b>Risk of fraud in revenue and expenditure recognition</b></p> <p data-bbox="91 708 1205 772">Misstatements that occur in relation to the risk of fraud in revenue and expenditure recognition could affect the income and expenditure account.</p> <p data-bbox="91 815 1211 986">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.</p> <p data-bbox="91 1034 383 1066">Our actions included:</p> <ul data-bbox="91 1086 1211 1324" style="list-style-type: none"><li data-bbox="91 1086 1211 1150">• Testing a sample of additions to property, plant and equipment (PPE) and reviewing for any inappropriate capitalisation of revenue expenditure;</li><li data-bbox="91 1171 1211 1235">• Reviewing a sample of revenue expenditure funded from capital (REFCUS) to ensure it was appropriately treated as such; and</li><li data-bbox="91 1256 1211 1324">• Testing a sample of capital grants to ensure appropriate recognition of multi-year funding.</li></ul>	<p data-bbox="1211 703 2107 767">We did not identify any material misstatements from revenue and expenditure recognition.</p> <p data-bbox="1211 810 2107 906">Overall our audit work has not identified any material issues or unusual transactions to indicate any misreporting of the Council's financial position.</p>

## Financial Statement Audit (cont'd)

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The key issues identified as part of our audit were as follows: (cont'd)

Significant Risk	Conclusion
<p><b>Misstatements due to fraud or error</b></p> <p>The financial statements as a whole are not free of material misstatements whether caused by fraud or error.</p> <p>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.</p> <p>Our actions included:</p> <ul style="list-style-type: none"><li>• Reviewing the change to the Council's minimum review provision (MRP) approach and testing its application as part of our testing on use of capital receipts and on s106 contributions;</li><li>• Reviewing changes to accounting policies;</li><li>• Reviewing material accounting estimates for evidence of management bias; and</li><li>• Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in preparing the financial statements.</li></ul>	<p>We have not identified any material weaknesses in controls or evidence of material management override.</p> <p>We have not identified any inappropriate judgements being applied in the Council's change to its MRP approach nor in any changes to accounting policies.</p> <p>We have not identified any inappropriate judgements being applied in the Council's calculation of material estimates.</p> <p>We did not identify any other transactions during our audit which appeared unusual or outside the Authority's normal course of business.</p>

## Financial Statement Audit (cont'd)

The key issues identified as part of our audit were as follows: (cont'd)

Other Key Findings	Conclusion
<p><b>Valuation of Property, Plant and Equipment (PPE)</b></p> <p>Property, Plant and Equipment represent a material balance in the Council's accounts. Valuation changes, the impact of impairment reviews and depreciation charges can also be material values.</p>	<p>Our work included:</p> <ul style="list-style-type: none"> <li>• Reviewing a sample of valuations for individual assets</li> <li>• Checking that assets are being revalued over a 5 year cycle</li> <li>• Reviewing assets not revalued in year for potential material changes</li> <li>• Testing the accounting entries made for revaluation.</li> </ul> <p>Our programme of work did identify some issues with the valuation of some PPE and as a result the Council made adjustments to the accounts increasing PPE in the balance sheet from £592m to £604m.</p>
<p><b>35 Pension Liability Valuation</b></p> <p>The Local Authority Accounting Code of Practice (the Code) and IAS19 require the Council to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Cambridgeshire County Council.</p> <p>The Council's pension fund deficit is a material and sensitive item and the Code requires that this liability be disclosed on the Council's balance sheet. At 31 March 2018 this totalled £277m.</p>	<p>We reviewed the assessment of the actuary employed by Cambridgeshire Pension Fund to value the scheme liabilities. The National Audit Office commission PWC to undertake this work and their report is in turn reviewed by EY pension specialists. The audit team followed up on the issues arising from the reports.</p> <p>There was a change in the total value of the pension fund net assets from the estimated year end balance used for IAS 19 reporting purposes and the actual. The impact of this was an overstatement of the Council's share of the pension fund assets by almost £6m. As a result the Council revised the disclosure of the pension liability from £277m to £271m.</p> <p>We did not identify any other issues with the accounting entries and disclosures made within the financial statements.</p>

## Financial Statement Audit (cont'd)

### Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	We determined planning materiality to be £10.9m (2016/17 : £10.5m), which is 2% of gross expenditure reported in the accounts.  We consider gross expenditure to be one of the principal considerations for stakeholders in assessing the financial performance of the Council.
Reporting threshold	We agreed with the Audit Committee that we would report to the Committee all audit differences in excess of £550,000 (2016/17 : £520,000)

We also identified the following areas where misstatement at a level lower than our overall materiality level might influence the reader. For these areas we developed an audit strategy specific to these areas. The areas identified and audit strategy applied include:

- ▶ Audit fees;
- ▶ Members allowances;
- ▶ Remuneration disclosures including any severance payments, exit packages and termination benefits; and
- ▶ Related party transactions.

We evaluate any uncorrected misstatements against both the quantitative measures of materiality discussed above and in light of other relevant qualitative considerations.





# 04 Value for Money

# £ Value for Money

We are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. This is known as our value for money conclusion.

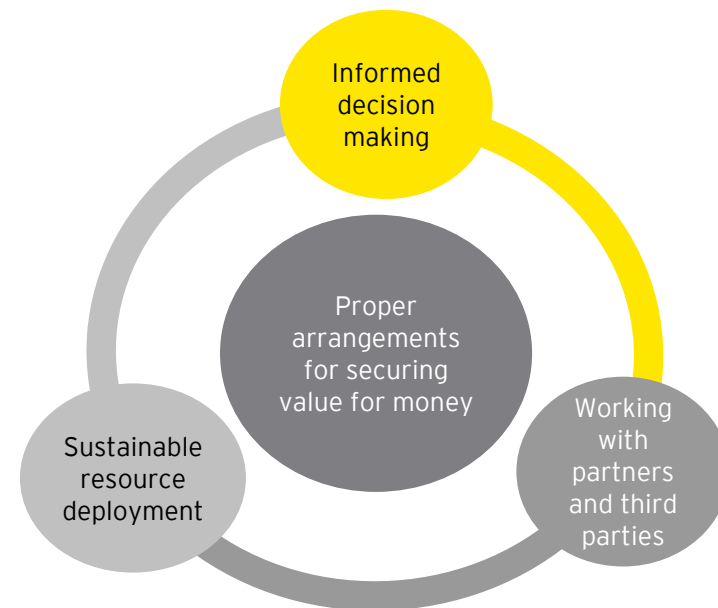
Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

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

We identified one significant risk around these arrangements. The table below presents our findings in response to the risk in our Audit Planning Report.

We performed the procedures outlined in our audit plan and did not identify any significant weaknesses in the Council's arrangements.

We therefore issued an unqualified value for money conclusion on 31 July 2018.



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Significant Risk	Conclusion
The Council had identified significant budget gaps over the 3 years from 2018/19.	<p>The Council has closed the 2018/19 budget gap through budget reductions and a planned use of the Grant Equalisation reserve. Whilst the Council's track record points to it being likely to achieve its finance plans significant gaps remain for 2019/20 and 2020/21. It is now in its next phase of its financial strategy to create a sustainable budget with less reliance on one-off measures and by identifying repeatable savings. This approach includes implementing a rolling budget process which will bring forward decision making and implementation, with the aim of improving accountability.</p> <p>Despite these plans and arrangements the Council, like many other councils across the country, faces several challenges that are driven by national policy and decisions outside of its control. As such there remain risks around its long term financial resilience.</p>



## 05 Other Reporting Issues





## Other Reporting Issues

### Whole of Government Accounts (WGA)

We performed the procedures required by the National Audit Office (NAO) on the accuracy of the consolidation pack prepared by the Council for WGA purposes. We had no issues to report.

### Annual Governance Statement

We are required to consider the completeness of disclosures in the Council's annual governance statement, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading. We had no matters to report.

### Report in the Public Interest

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the Council or brought to the attention of the public.

We did not identify any issues which required us to issue a report in the public interest.

### Written Recommendations

We have a duty under the Local Audit and Accountability Act 2014 to designate any audit recommendation as one that requires the Council to consider it at a public meeting and to decide what action to take in response.

We did not identify any issues which required us to issue a written recommendation.

### Other powers and duties

We did not receive any objections to the 2017/18 financial statements from members of the public and had no issues that required us to use our additional powers under the Local Audit and Accountability Act 2014.

### Independence

We communicated our assessment of independence in our Audit Results Report to the Audit Committee on 16 July 2018. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.





## Other Reporting Issues (cont'd)

### Control Themes and Observations

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 did not identify 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.



# 06 Focused on your future



## Focused on your future

The Code of Practice on Local Authority Accounting in the United Kingdom introduces the application of new accounting standards in future years. These are set out below however the impact on the Council is not considered to be significant.

Standard	Issue	Impact
<b>IFRS 9 Financial Instruments</b>	<p>Applicable for local authority accounts from the 2018/19 financial year and will change:</p> <ul style="list-style-type: none"> <li>▶ How financial assets are classified and measured;</li> <li>▶ How the impairment of financial assets are calculated; and</li> <li>▶ The disclosure requirements for financial assets.</li> </ul> <p>There are transitional arrangements within the standard and the 2018/19 Accounting Code of Practice for Local Authorities has now been issued, providing guidance on the application of IFRS 9. In advance of the Guidance Notes being issued, CIPFA have issued some provisional information providing detail on the impact on local authority accounting of IFRS 9, however the key outstanding issue is whether any accounting statutory overrides will be introduced to mitigate any impact.</p>	<p>Although the Code has now been issued, providing guidance on the application of the standard, along with other provisional information issued by CIPFA on the approach to adopting IFRS 9, until the Guidance Notes are issued and any statutory overrides are confirmed there remains some uncertainty.</p>
<b>IFRS 15 Revenue from Contracts with Customers</b>	<p>Applicable for local authority accounts from the 2018/19 financial year. This new standard deals with accounting for all contracts with customers except:</p> <ul style="list-style-type: none"> <li>▶ Leases;</li> <li>▶ Financial instruments;</li> <li>▶ Insurance contracts; and</li> <li>▶ For local authorities; Council Tax and NDR income.</li> </ul> <p>The key requirements of the standard cover the identification of performance obligations under customer contracts and the linking of income to the meeting of those performance obligations.</p> <p>Now that the 2018/19 Accounting Code of Practice for Local Authorities has been issued it is becoming clear what the impact on local authority accounting will be. As the vast majority of revenue streams of Local Authorities fall outside the scope of IFRS 15, the impact of this standard is likely to be limited.</p>	<p>As with IFRS 9, some provisional information on the approach to adopting IFRS 15 has been issued by CIPFA in advance of the Guidance Notes. Now that the Code has been issued, initial views have been confirmed; that due to the revenue streams of Local Authorities the impact of this standard is likely to be limited.</p> <p>The standard likely to impact on Local Authority Trading Companies who will have material revenue streams arising from contracts with customers.</p>



## Focused on your future (cont'd)

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Standard	Issue	Impact
<b>IFRS 16 Leases</b>	<p>It is currently proposed that IFRS 16 will be applicable for local authority accounts from the 2019/20 financial year.</p> <p>Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet.</p> <p>There are transitional arrangements within the standard and although the 2019/20 Accounting Code of Practice for Local Authorities has yet to be issued, CIPFA have issued some limited provisional information which begins to clarify what the impact on local authority accounting will be. Whether any accounting statutory overrides will be introduced to mitigate any impact remains an outstanding issue.</p>	<p>Until the 2019/20 Accounting Code is issued and any statutory overrides are confirmed there remains some uncertainty in this area.</p> <p>The standard will affect authorities with significant leases.</p>

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A close-up photograph of a person's hand reaching into a filing cabinet to touch a folder. The cabinet is filled with numerous folders of various colors (yellow, blue, white) and sizes, each containing stacks of papers. The background is a textured, light-colored wall.

## 07 Audit Fees

## Audit Fees

As part of our reporting on our independence, we set out below a summary of the fees for the year ended 31 March 2018.

For 2017/18 we undertake the housing benefits certification work under the PSAA arrangements and we confirm that we have not undertaken any other non-audit work.

The additional fees for 2017/18 have been agreed with the Section 151 Officer and are now subject to PSAA approval.

	Final fee 2017/18	Planned fee 2017/18	Scale fee 2017/18	Final Fee 2016/17
	£	£	£	£
Standard fee	108,533	108,533	108,533	108,533
Additional audit work:				
- Issues with supporting working papers	1,755	-	-	2,500
- Late issue with PPE valuations	4,995	-	-	-
<b>Total audit fee - code work</b>	<b>115,283</b>	<b>108,533</b>	<b>108,533</b>	<b>111,033</b>
Other non-audit services not covered above (Housing Benefits)	Tbc	13,619	13,619	24,075
<b>Total fees</b>	<b>Tbc</b>	<b>122,152</b>	<b>122,152</b>	<b>135,108</b>

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