



Peterborough City Council  
Resources  
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Bittern Way  
Fletton Quays  
Peterborough PE2 8TY

Mark Hodgson  
Partner  
Ernst & Young  
1 More London Place  
SE1 2AF  
London

22 November 2024

This letter of representations is provided in connection with your audit of the consolidated and Council financial statements of Peterborough City Council ("the Group and 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 consolidated and Council financial statements give a true and fair view of the Group and Council financial position of *Peterborough City Council* as of *31 March 2022* and of its financial performance (or operations) and its cash flows for the year then ended in accordance with, for the Group and Council CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

We understand that the purpose of your audit of our consolidated and Council financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing, 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, for the Group and Council the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as

amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).

2. We acknowledge, as members of management of the Group and Council, our responsibility for the fair presentation of the consolidated and Council financial statements. We believe the consolidated and Council 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 Group and Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022<sup>1</sup> and are free of material misstatements, including omissions. We have approved the consolidated and Council financial statements.
3. The significant accounting policies adopted in the preparation of the Group and Council financial statements are appropriately described in the Group and Council financial statements.
4. As members of management of the Group and Council, we believe that the Group and Council have 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 and (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022) for the Group and Council and that are free from material misstatement, whether due to fraud or error.
5. EY have confirmed that following “The Accounts and Audit (Amendment) Regulations 2024” (the SI) which imposed a backstop date of 13 December 2024 by which date they are required to issue an opinion on the financial statements. They have determined that they cannot meet the objectives of the ISAs (UK) imposed by the backstop date which means that they cannot complete all necessary procedures to obtain sufficient, appropriate audit evidence to support the opinion and fulfil all the objectives of all relevant ISAs (UK). EY anticipate issuing a disclaimed audit opinion for both 2021/22 and 2022/23 Financial years.
6. We have carried out the exercise of getting the opening balances corrected for the Statement of Accounts 2021/22. Additionally, we have also made sure that the Statement of Accounts presented for 2021/22 agree back to the Trial balance and the ledger.
7. We confirm the Group and Council does not have securities (debt or equity) listed on a recognized exchange.

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

1. We acknowledge that we are responsible for determining that the Group and Council’s activities are conducted in accordance with laws and regulations and that we are responsible for identifying and addressing 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 and that we believe we have appropriately fulfilled those responsibilities.
3. We have disclosed to you the results of our assessment of the risk that the consolidated and Council financial statements may be materially misstated as a result of fraud.
4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Group or Council (regardless of the source or form and including without limitation, any allegations by “whistleblowers”), including non-compliance matters:
  - involving financial improprieties;
  - related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the consolidated or Council’s financial statements;
  - related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Group or Council’s activities, its ability to continue to operate, or to avoid material penalties;
  - involving management, or employees who have significant roles in internal controls, or others; or
  - in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

### **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 consolidated and Council financial statements.
3. We have made available to you all minutes of the meetings of the Group, Council, Cabinet and Audit Committee held through the year to the most recent meeting on the following date: 09 September 2024

4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Group and 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 year ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the consolidated and Council 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 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
6. We have disclosed to you, and the Group and Council has complied with, all aspects of contractual agreements that could have a material effect on the consolidated and Council 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 unauthorised 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 on the Group and Council financial statements, in each case or in the aggregate, and ransomware attacks when we paid or are contemplating paying a ransom, regardless of the amount.

#### **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 consolidated and Council 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 to litigation and claims, both actual and contingent, and have disclosed in Note 41 to the consolidated and Council financial statements all guarantees that we have given to third parties.

#### **E. Going Concern**

1. Note 45 to the consolidated and Council financial statements discloses all the matters of which we are aware that are relevant to the Group and 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, subsequent to year end which require adjustment of or disclosure in the consolidated and Council financial statements or notes thereto.
2. In relation to the Fletton Quay Hilton Hotel, we confirm that the full value of the Council's loan is secured and that we are not aware of any material losses that the Council may incur.

## **G. Group audits**

1. There are no significant restrictions on our ability to distribute the retained profits of the Group because of statutory, contractual, exchange control or other restrictions other than those indicated in the Group financial statements.
2. Necessary adjustments have been made to eliminate all material intra-group unrealised profits on transactions amongst the Council, subsidiary undertakings and associated undertakings.

## **H. Other information**

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

## **Reserves**

1. We have properly recorded or disclosed in the consolidated and Council financial statements the useable and unusable reserves.

## **Use of the Work of a Specialist**

1. We agree with the findings of the specialists that we engaged to evaluate the property, plant and equipment and investment property valuations, the pension liability valuation and financial instrument valuations and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the consolidated and Council 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.

## **Estimates**

- **Minimum Revenue Provision**
- **Pensions Liability**
- **Private Finance Initiative**
- **Property, Plant and Equipment and Investment Properties – valuations, impairments and depreciation**

- **Provision for Impairment of Receivables**

- **Financial Instruments**

1. We confirm that the significant judgments made in making the estimates 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 above accounting estimates.
3. We confirm that the significant assumptions used in making the above estimates appropriately reflect our intent and ability to carry out our statutory services on behalf of the entity.
4. We confirm that the disclosures made in the consolidated and Council entity 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 (as amended by the Update to the Code and Specifications for Future Codes for Infrastructure Assets (November 2022)).
5. We confirm that appropriate specialized skills or expertise has been applied in making the above estimates.
6. We confirm that no adjustments are required to the accounting estimate(s) and disclosures in the consolidated and parent entity financial statements, including due to the COVID-19 pandemic.

**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.

*Yours faithfully,*

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(Chief Financial Officer)

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(Chair of the Audit Committee)

**Appendix 1 – Adjustments to 2021/22 Statement of Accounts from published to ones being approved.**

**1. £1,274k Revaluation Losses 62-68 Bridge Street- Correction**

- Debit Balance Sheet -Property plant and Equipment
- Credit Comprehensive Income and Expenditure statement (CIES)
- Debit Movement in Reserves Statement.
- Credit Unusable Reserves – Capital Adjustment Account

**2. £(984k) Debtor Correction comprising of.**

£(896k) reclassification between Debtors and Creditors

- Credit Debtors
- Debit Creditors

£1791k Adjustment to Payment in Advance correction

- Debit Debtors
- Credit Usable Reserves

£(1,878k) Reclassification of Business rates Prepayments between Debtors and Creditors

- Credit Debtors
- Debit Creditors

**3. £6,059 Creditor Correction comprising of.**

£67k Sand Martin House adjustment- Correction

- Debit Debtors
- Credit CIES

£896K reclassification between Debtors and Creditors

- Debit Creditors
- Credit Debtors

£3,178k Dedicated Schools Grant correction

- Debit Creditors
- Credit Usable Reserves

£120k Department for Transport A14 Improvement Scheme funding correction

- Debit Creditors
- Credit Usable Reserves

£1,878k Reclassification of Business rates Prepayments

- Debit Creditors
- Debit Debtors

£(13k) Reclassification of the finance lease liability from long term to short term

- Credit Creditors
- Debit Other Long-Term Liabilities

**4. £(1,979k) IAS19 FRS 17 Pension Reserve Adjustment**

- Credit Pension Liability
- Debit Pension Reserve

**5. We have corrected opening balances and made sure the accounts reconcile to the closing Trial balance for 2021/22.**

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