

# The Annual Audit Letter for Shropshire Council

Year ended 31 March 2020

22 February 2021



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# Your key Grant Thornton team members are:

#### **Richard Percival**

Director

T: 0121 232 5434 E: Richard.d.percival@uk.gt.com

#### Mary Wren

Manager

T: 0121 232 5254

E: mary.wren@uk.gt.com

#### Siobhan Barnard

In-charge

T: 0121 232 5121

E: Siobhan.barnard@uk.gt.com

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# **Executive Summary**

#### **Purpose**

Our Annual Audit Letter (Letter) summarises the key findings arising from the work that we have carried out at Shropshire Council (the Council) for the year ended 31 March 2020.

This Letter is intended to provide a commentary on the results of our work to the Council and external stakeholders, and to highlight issues that we wish to draw to the attention of the public. In preparing this Letter, we have followed the National Audit Office (NAO)'s Code of Audit Practice and Auditor Guidance Note (AGN) 07 – 'Auditor Reporting'. We reported the detailed findings from our audit work to the Council's Audit Committee as those charged with governance in our Audit Findings Report on 29th October 2020.

#### **Respective responsibilities**

We have carried out our audit in accordance with the NAO's Code of Audit Practice, which reflects the requirements of the Local Audit and Accountability Act 2014 (the Act). Our key responsibilities are to:

- give an opinion on the Council's financial statements (section two)
- assess the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources (the value for money conclusion) (section three).

In our audit of the Council's financial statements, we comply with International Standards on Auditing (UK) (ISAs) and other guidance issued by the NAO.

#### **Our work**

Materiality	We determined materiality for the audit of the Council's financial statements to be £8,600,000, 1.5% of the Council's gross ost of services. We determined materiality for the audit of the Council's financial statements as a whole to be £8.700 million (Group) and £8.600 million (single entity statements), which equates to approximately 1.5% of the Council's gross operating expenses.
Financial Statements opinion	We gave an unqualified opinion on the Council's financial statements on 19 November 2020.
	Our opinion included an emphasis of matter paragraph drawing attention to Note 4 of the financial statements, which describes the effects of the Covid-19 pandemic on the valuation of the Authority's and land and buildings and the Authority's share of the pension fund's property investments as at 31 March 2020. As disclosed in note 4 to the financial statements, the outbreak of Covid-19, has seen many sectors of real estate markets experiencing significantly lower levels of transactional activity and liquidity. As at the valuation date, there is a shortage of market evidence for comparison purposes, to inform opinions of value. A material valuation uncertainty was therefore disclosed in both the Authority's land and buildings and the pension fund's property valuation reports. This paragraph did not represent a modification of our audit opinion.
Whole of Government Accounts (WGA)	We have completed our work on the Council's consolidation return in line with guidance issued by the NAO.
Use of statutory powers	We did not identify any matters which required us to exercise our additional statutory powers.

# **Executive Summary**

Value for Money arrangements	We were satisfied that the Council put in place proper arrangements to ensure economy, efficiency and effectiveness in its use of resources. We reflected this in our audit report to the Council on 19 November 2020.
Certificate	We certified closure of the audit on 8th December 2020 following the completion of our work on Whole of Government Accounts.

#### **Working with the Council**

The outbreak of the Covid-19 coronavirus pandemic has had a significant impact on the normal operations of the Council including the administration of grants to businesses, closure of schools and car parks with additional challenges of reopening services under new government guidelines.

The finance team also had to manage remote working, access to systems and team capacity.

Authorities were still required to prepare financial statements in accordance with the relevant accounting standards and the CIPFA Code of Practice albeit to an extended deadline for the preparation of the financial statements up to 31 August 2020 and the date for audited financials statements to 30 November 2020.

We updated our audit risk assessment to consider the impact of the pandemic on our audit and issued an audit plan addendum on 31 July 2020. In that addendum we reported an additional financial statement risk in respect of Covid-19 and highlighted the impact on our VfM approach.

The Council published its draft financial statements on its website on 10<sup>th</sup> July 2020. A version of the financial statements were made available to the audit team at the same time. Restrictions for non-essential travel meant both Council and audit staff had to work remotely including, remote accessing financial systems, video calling, alternative procedures for the physical verification of assets and completeness and accuracy of information produced by the entity.

Inevitably remote working impacted on delivery and additional time and resources were necessary on both sides to complete the work in accordance with the new extended reporting timetable.

In particular, Covid 19 increased the work undertaken in relation to Pensions Liabilities and Property Valuation due to the uncertainty of valuations. There was also an increase in the time taken to perform the audit as a direct result of remote working.

We would like to record our appreciation for the assistance and co-operation provided to us during our audit by the Council's staff.

Grant Thornton UK LLP February 2021

## **Our audit approach**

## **Materiality**

In our audit of the Council's financial statements, we use the concept of materiality to determine the nature, timing and extent of our work, and in evaluating the results of our work. We define materiality as the size of the misstatement in the financial statements that would lead a reasonably knowledgeable person to change or influence their economic decisions.

We determined materiality for the audit of the Council's financial statements to be £8,600,000 (£8,700,000 for the Group), 1.5% of the Council's gross cost of services. We used this benchmark as, in our view, users of Council's financial statements are most interested in where the Council has spent its revenue in the year.

We also set a lower level of specific materiality of £100,000 for senior officer remuneration due to the sensitive nature and public interest of this area of the financial statements.

We set a threshold of £430,000 (£435,00 for the Group), above which we reported errors to the Audit Committee in our Audit Findings Report.

## The scope of our audit

Our audit involves obtaining sufficient evidence about the amounts and disclosures in the financial statements to give reasonable assurance that they are free from material misstatement, whether caused by fraud or error. This includes assessing whether:

- the accounting policies are appropriate, have been consistently applied and adequately disclosed;
- the significant accounting estimates made by management are reasonable; and
- the overall presentation of the financial statements gives a true and fair view.

We also read the remainder of the Statement of Accounts to check it is consistent with our understanding of the Council and with the financial statements included in the Statement of Accounts on which we gave our opinion.

We carry out our audit in accordance with ISAs (UK) and the NAO Code of Audit Practice. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our audit approach was based on a thorough understanding of the Council's business and is risk based.

We identified key risks and set out overleaf the work we performed in response to these risks and the results of this work.

# **Significant Audit Risks**

These are the significant risks which had the greatest impact on our overall strategy and where we focused more of our work.

Risks identified in our audit plan	How we responded to the risk	Findings and conclusions
Covid-19  The global outbreak of the Covid-19 virus pandemic has led to unprecedented uncertainty for all organisations, requiring urgent business continuity arrangements to be implemented. We expected that this would have an impact on the production and audit of the financial statements for the year ended 31 March 2020, including and not limited to;  - Remote working arrangements and redeployment of staff to critical front line duties could impact on the quality and timing of the production of the financial statements, and the evidence we can obtain through physical observation  - Volatility of financial and property markets increased the uncertainty of assumptions applied by management to asset valuation and receivable recovery estimates, and the reliability of evidence we can obtain to corroborate management estimates  - Financial uncertainty required management to reconsider financial forecasts supporting their going concern assessment and whether material uncertainties for a period of at least 12 months from the anticipated date of approval of the audited financial statements have arisen; and  - Disclosures within the financial statements required significant revision to reflect the unprecedented situation and its impact on the preparation of the financial statements as at 31 March 2020 in accordance with IAS1, particularly in relation to material uncertainties.  We therefore identify the global outbreak of the Covid-19 virus as a significant risk.	<ul> <li>As part of our audit work we:</li> <li>worked with management to understand the implications the response to the Covid-19 pandemic had on the organisation's ability to prepare the financial statements</li> <li>liaised with other audit suppliers, regulators and government departments to co-ordinate practical cross-sector responses to issues as and when they arose</li> <li>evaluated the adequacy of the disclosures in the financial statements that arose in light of the Covid-19 pandemic</li> <li>evaluated whether sufficient audit evidence could be obtained through remote technology;</li> <li>evaluated whether sufficient audit evidence could be obtained to corroborate significant management estimates such as assets and the pension fund liability valuations</li> <li>evaluated management's assumptions that underpin the revised financial forecasts and the impact on management's going concern assessment</li> <li>engaged the use of auditor experts for asset valuations</li> </ul>	A material valuation uncertainty in respect of land and buildings and pension fund assets as at 31 March 2020 was reported in the financial statements. We drew attention to this uncertainty through inclusion of an emphasis of matter paragraph to be included in our audit report.  We did not identify any further material uncertainties in relation to Covid-19 that would result in a material misstatement in the financial statements.

# **Significant Audit Risks - continued**

These are the significant risks which had the greatest impact on our overall strategy and where we focused more of our work.

Risks identified in our audit plan	How we responded to the risk	Findings and conclusions
Valuation of land and buildings  The Council revalues its land and buildings on a five-yearly basis. To ensure the carrying value in the Council and group financial statements is not materially different from the current value at the financial statements date, the Council requests a desktop valuation from its valuation expert. This valuation represents a significant estimate by management in the financial statements due to the value involved (£1,069 million in the Council's balance sheet as at 31 March 2019) and the sensitivity of this estimate to changes in key assumptions.  We therefore identified the valuation of land and buildings as a significant risk, which was one of the most significant assessed risks of material misstatement, and a key audit matter	<ul> <li>As part of our audit we:</li> <li>evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work</li> <li>evaluated the competence, capabilities and objectivity of the valuation expert</li> <li>wrote to the valuer to confirm the basis on which the valuation was carried out to ensure that the requirements of the Code are met</li> <li>challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding</li> <li>Tested revaluations made during the year to see if they had been input correctly into the Authority's asset register</li> </ul>	Due to the outbreak of Covid-19 market activity has been impacted in many sectors. The Council's valuers considered that less weight can be attached to previous market evidence to inform their opinions of value as at 31 March 2020. They therefore reported to the Council on the basis of 'material valuation uncertainty'  The Council expanded the relevant wording within the Financial Statements in relation to material uncertainty to give the reader a better understanding of the RICS guidance. We included this within our Emphasis of Matter to draw this to the attention of the reader.

# **Significant Audit Risks - continued**

These are the significant risks which had the greatest impact on our overall strategy and where we focused more of our work.

Risks identified in our audit plan	How we responded to the risk	Findings and conclusions
Valuation of net pension liability The Council's pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant estimate in the financial statements.  The pension fund net liability is considered a significant estimate due to the size of the numbers involved (£40.891million in the Council's balance sheet) and the sensitivity of the estimate to changes in key assumptions.  We therefore identified valuation of the Council's pension fund net liability as a significant risk, which was one of the most significant assessed risks of material misstatement.	<ul> <li>updated our understanding of the processes and controls put in place by management to ensure that the Council's pension fund net liability is not materially misstated and evaluate the design of the associated controls;</li> <li>evaluated the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work;</li> <li>assessed the competence, capabilities and objectivity of the actuary who carried out the Council's pension fund valuation;</li> <li>assessed the accuracy and completeness of the information provided by the Council to the actuary to estimate the liability;</li> <li>tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary;</li> <li>carried out procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report;</li> </ul>	We noted that the valuation of pension fund investments properties are reported on the basis of material valuation uncertainty due to the impact of the pandemic. The financial statements were amended to report this and we referred to this in the emphasis of matter paragraph in our audit opinion.

# **Significant Audit Risks - continued**

These are the risks which had the greatest impact on our overall strategy and where we focused more of our work.

Risks identified in our audit plan	How we responded to the risk	Findings and conclusions
Management override of internal controls  Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management over-ride of controls is present in all entities. The Council faces external scrutiny of its spending and this could potentially place management under undue pressure in terms of how they report performance.  We therefore identified management override of control, in particular journals, management estimates and transactions outside the course of business as a significant risk, this was one of the most significant assessed risks of material misstatement.	<ul> <li>we:</li> <li>evaluated the design effectiveness of management controls over journals</li> <li>analysed the journals listing and determined the criteria for selecting high risk unusual journals</li> <li>tested unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration</li> <li>gained an understanding of the accounting estimates and critical judgements applied made by management and considered their reasonableness with regard to corroborative evidence</li> <li>evaluated the rationale for any changes in accounting policies, estimates or significant unusual transactions</li> </ul>	Our work did not identify any issues in respect of management override of controls

# **Significant Audit Risks - continued**

These are the risks which had the greatest impact on our overall strategy and where we focused more of our work.

Risks identified in our audit plan	How we responded to the risk	Findings and conclusions
Improper revenue recognition  Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue.  This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition. Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Authority, we determined that the risk of fraud arising from revenue recognition can be rebutted, because:  • there is little incentive to manipulate revenue recognition  • opportunities to manipulate revenue recognition are very limited  • the culture and ethical frameworks of local authorities, including Shropshire Council, mean that all forms of fraud are seen as unacceptable.	Whilst not a significant risk, as part of our audit work we did undertake work on material revenue items.	Our work did not identify any matters that would indicate our rebuttal was incorrect.

# **Significant Findings – Other Issues**

This section provides commentary on issues and risks which were identified during the course of the audit.

Issue	Commentary
International Financial Reporting Standard (IFRS) 16 Leases – (issued but not adopted)	We reviewed the draft financial statements to assess whether the Council had included appropriate disclosures relating to the impact of the implementation of IFRS 16.
We reported in our audit plan that the implementation of IFRS 16 from 1 April 2020 would be recognised as a risk for 2019/20.	
Implementation of IFRS 16 was subsequently delayed to 1 April 2021 as a result of the Covid19 pandemic. However, audited bodies were still required to include disclosures in their 2019/20 statements. As a minimum, we expected audited bodies to disclose the title of the standard, the date of initial application and the nature of the changes in accounting policy for leases.	
Dedicated Schools Grant  The Council had a cumulative overspend of £2.247m as 31 March 2020 due to insufficient government funding. We have reviewed the statement from CIPFA which confirms the guidance in LAAP bulletin 99 Local Authority Reserves and Balances remains extant i.e it "neither anticipates nor allows for a voluntary earmarked balance to be presented in a deficit position."	We reviewed the draft financial statements note 38 (Dedicated schools Grant) Narrative changes were discussed and agreed with the Council.
Group accounts  The financial statements include group accounts which report the consolidated position for the Council's subsidiaries and entities where it has significant control or influence. This includes Shropshire Town and Rural Housing Limited (STaR), the West Mercia Energy Joint Committee, the Jersey Property Unit Trust (including SSC No 1 Limited) and the new housing development company Cornovii Developments Limited. The group accounts also include financial transactions that will enable IP&E Limited to be dissolved during 2020/21.	We reviewed the group consolidation process and disclosure within the financial statements. No issues were identified as part of this review.

## **Significant Findings – Other Issues**

This section provides commentary on issues and risks which were identified during the course of the audit.

## Commentary Issue The Council is closely monitoring the financial impacts of Covid19 using the best Going concern available data. Transformation and mitigating actions are being implemented to combat Clearly the pandemic has been a factor in both the Council's thinking further overspends. The strong reserves position and ability to liquidate cash and cash going forward as well as the audit team's work from a going concern and equivalents provide a stabilising effect for the Councils plans. VfM perspective. The Council's income streams (local taxation, fees and charges) have been affected and are susceptible to change as a We are therefore of the view that the going concern assertion is appropriate for the result of the pandemic. These impacts are being monitored regularly by Council and did not include a material uncertainty in this area within our audit report the Council using a reasonable and reasonable worse case scenario. We are also aware that funding from central government is being made available to mitigate the additional risks facing the Council, however there does remain uncertainty over the actual levels and if this will cover the extra costs generated by providing services during the pandemic. The Council has reviewed its Medium Term Financial Plan (MTFP) in light of Covid 19— we are aware that this is a situation which is changing as funding announcements are being made however we are satisfied that the Council has updated its MTFP with known developments and communicated the effects of this to Those Charged With Governance (TCWG).

## **Audit opinion**

We gave an unqualified opinion on the Council's financial statements on 19<sup>th</sup> November 2020.

#### **Preparation of the financial statements**

The Council published its draft financial statements on its website on 10<sup>th</sup> July 2020. A version of the financial statements were made available to the audit team at the same time. The finance team responded promptly and efficiently to our queries during the course of the audit.

Restrictions for non-essential travel meant both Council and audit staff had to work remotely including, remote accessing financial systems, video calling, alternative procedures for the physical verification of assets and completeness and accuracy of information produced by the entity.

Inevitably remote working impacted on delivery and additional time and resources were necessary on both sides to complete the work in accordance with the new extended reporting timetable.

In particular, Covid-19 increased the work undertaken in relation to Pensions Liabilities and Property Valuation due to the uncertainty of valuations. There was also been an increase in the time taken to perform the audit as a direct result of remote working.

## Issues arising from the audit of the financial statements

We reported the key issues from our audit to the Council's Audit Committee on 29th October 2020.

#### **Annual Governance Statement and Narrative Report**

We are also required to review the Council's Annual Governance Statement and Narrative Report. It published them on its website as part of the draft Statement of Accounts in June 2020.

Both documents were prepared in line with the CIPFA Code and relevant supporting guidance. We confirmed that both documents were consistent with the financial statements prepared by the Council and with our knowledge of the Council.

## Whole of Government Accounts (WGA)

We have completed our work on the Council's consolidation return in line with guidance issued by the NAO.

## Other statutory powers

We also have additional powers and duties under the Act, including powers to issue a public interest report, make written recommendations, apply to the Court for a declaration that an item of account is contrary to law, and to give electors the opportunity to raise questions about the Council's accounts and to raise objections received in relation to the accounts.

We did not identify any matters which required us to exercise our additional statutory powers.

#### Certificate of closure of the audit

We certified closure of the audit on 8<sup>th</sup> December 2020 following the completion of our work on Whole of Government Accounts.

# Value for Money conclusion

#### **Background**

We carried out our review in accordance with the NAO Code of Audit Practice, following the guidance issued by the NAO in April 2020 which specified the criterion for auditors to evaluate:

In all significant respects, the audited body takes properly informed decisions and deploys resources to achieve planned and sustainable outcomes for taxpayers and local people.

## **Key findings**

Our first step in carrying out our work was to perform a risk assessment and identify the risks where we concentrated our work.

The risks we identified and the work we performed are set out overleaf.

As part of our Audit Findings report agreed with the Council in 29<sup>th</sup> October 2020, we agreed recommendations to address our findings.

## **Overall Value for Money conclusion**

We are satisfied that in all significant respects the Council put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ending 31 March 2020.

# Value for Money conclusion

## **Value for Money Risks**

Risks identified in our audit	plai
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#### Financial sustainability

We identified the following risk in our audit plan:

In common with the Local Government sector as a whole, the Authority is under increasing funding pressure and, as a result, is facing a challenging savings target. This is further complicated by the issues arising as a result of the Covid-19 pandemic.

We will continue to meet with senior management to consider how the financial pressures are being managed on an ongoing basis. We will also discuss working arrangements during the Covid-19 pandemic, with a particular focus on the following;

- the reprofiling of planned expenditure to meet changing demands;
- oversight of additional funding provided both to the Authority and on an agency basis;
- and governance and data security arrangements during a period of widespread remote working.

# How we responded to the risk

We have met with senior management to consider how the financial pressures are being managed on an ongoing basis. We also discussed working arrangements during the Covid-19 pandemic, with a particular focus on the following:

- the reprofiling of planned expenditure to meet changing demands:
- oversight of additional funding provided both to the Authority and on an agency basis;
- and governance and data security arrangements during a period of widespread remote working.

## Findings and conclusions

#### **Outturn position 2019/20**

Historically, the Council has delivered against its financial objectives, this continued to be the case for 2019/20 with a £1.682m controllable overspend on the General Fund (GF) budget and a £4.106m underspend on the Housing Revenue Account Budget.

Within the £1.692m General fund overspend were significant pressures relating to Children's Services (£6.668m overspend) and Place (£6.256m overspend). These overspends were offset largely by the Corporate budget underspend of £11.352m which was mainly non recurrent savings totalling £7.456m including the release of a contingency built up from MRP savings, unused s31 grant and early payment of pension contributions.

The availability of non recurrent measures to balance annual budgets is now very limited and the continued reliance on one-off funding is unsustainable. The Council will need to deliver identified savings and develop further schemes to support the financial position going forward.

## Capital programme

The Council has seen slippage in its capital programme of £127.209m. This is largely due to delays in delivering agreed programmed works and projects commencing late. The budget to be carried forward to 2020/21 for these specific planned works total £24.716m on the Housing Investment Programme.

#### Updated financial strategy - Covid 19

The local authority funding uncertainties and continuing Covid financial pressures mean that the Council faces a significant financial challenge over the next two years. Although it has a good track record on managing its financial position, it is likely that difficult decisions will need to be made as part of the 2022/23 budget setting process to ensure financial sustainability is maintained.

It is clear that the Council has responded positively to the challenge presented by Covid-19 and are adequately monitoring and assessing the current and future impacts on the Council's finances.

Based on our review of the significant risk identified we have concluded that Shropshire Council has proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

# A. Reports issued and fees

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

#### **Reports issued**

Report	Date issued
Audit Plan	25 <sup>th</sup> February 2020
Audit plan Addendum	31st July 2020
Audit Findings Report	29th October 2020
Annual Audit Letter	4th March 2021

#### Fees

	Planned	Actual fees 2018/19 fees	
	£	£	£
Statutory audit	126,561	148,830	115,061
Non-audit fees for other services	21,100	21,100	21,245
CFO insights Licence	10,000	10,000	10,000
Total fees	157,661	179,930	146,306

Area	Reason	Fee proposed £
Impact of Covid- 19 on audit arrangements	Fee variation due to impact of Covid-19 on audit input	18,984
Member question	Responding to Member question regarding the governance of the Authority's Highways contract	3,285
Total		£22,269

Fee variation subject to PSAA approval.

#### **Audit fee variation**

As outlined in our audit plan, the 2019-20 scale fee published by PSAA of £103,061 assumed that the scope of the audit did not significantly change. We included a fee variation of £23,500 in our plan due to the enhanced auditing requirements since the scale fee was set. During the course of our audit further additional work was required. We have discussed our proposed fee variation with the Director of Finance, Governance and Assurance.

#### Non-audit fees for other services

- Other services include Certification of Housing Benefit Grant Claim (£13,300), Teachers Pension Return (£4,800) and Certification of Housing capital receipts grant (£3,000)
- For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council. We have considered whether non-audit services might be perceived as a threat to our independence as the Council's auditor and have ensured that appropriate safeguards are put in place.

The above non-audit services are consistent with the Council's policy on the allotment of non-audit work to your auditor.

# B. Reports issued and fees - Pension Fund

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

#### **Reports issued**

Report	Date issued
Audit Plan	31st July 2020
Audit plan Addendum	31st July 2020
Audit Findings Report	18th September 2020

Area	Reason	Fee proposed £
Impact of Covid- 19 on audit arrangements	Fee variation due to impact of Covid-19 on audit input	3,343
Total		£3,343

#### Fees

	Planned Actual fees 2018/19 fees		
	£	£	£
Statutory audit	22,289	25,632	18,039
Non-audit fees for other services - IAS 19 letters	3,000	3,000	2,000
Total fees	25,289	28,632	20,039

Fee variation subject to PSAA approval.

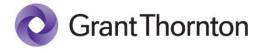
#### **Audit fee variation**

As outlined in our audit plan, the 2019-20 scale fee published by PSAA of £18,039 assumed that the scope of the audit did not significantly change. We included a fee variation of £4,250 in our plan due to the enhanced auditing requirements since the scale fee was set. During the cours e of our audit further additional work was required. We have discussed our proposed fee variation with the Director of Finance, Governance and Assurance

#### Non-audit fees for other services

- We are required to respond to requests from the auditors of admitted bodies for assurance in respect of information held by the Fund and provided to the actuary to support IAS 19 calculations.
- For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council. We have considered
  whether non-audit services might be perceived as a threat to our independence as the Council's auditor and have ensured that appropriate
  safeguards are put in place.

The above non-audit services are consistent with the Council's policy on the allotment of non-audit work to your auditor.



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