### Three Rivers District Council Audit Results Report

Year ended 31 March 2017



Private and Confidential

26 September 2017

Dear Audit Committee Members

We have substantially completed our audit of Three Rivers District Council (the Authority) for the year ended 31 March 2017.

Subject to concluding the outstanding matters listed in our report, we confirm that we expect to issue an unqualified audit opinion on the financial statements in the form at Section 3, before the statutory deadline of 30 September 2017. We also have no matters to report on your arrangements to secure economy, efficiency and effectiveness in your use of resources

This report is intended solely for the use of the Audit Committee, other members of the Authority, and senior management. It should not be used for any other purpose or given to any other party without obtaining our written consent.

We would like to thank your staff for their help during the engagement.

We look forward to discussing with you any aspects of this report or any other issues arising from our work.

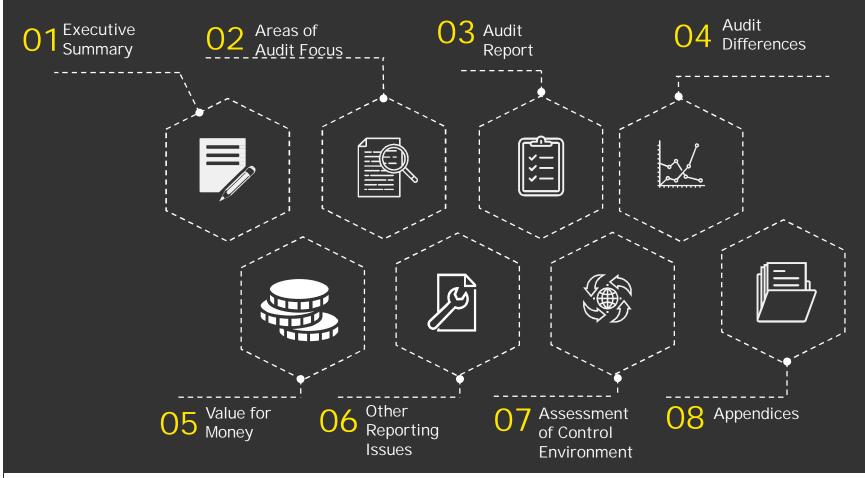
Yours faithfully

Andrew Brittain Executive Director

For and on behalf of Ernst & Young LLP

United Kingdom

## Contents

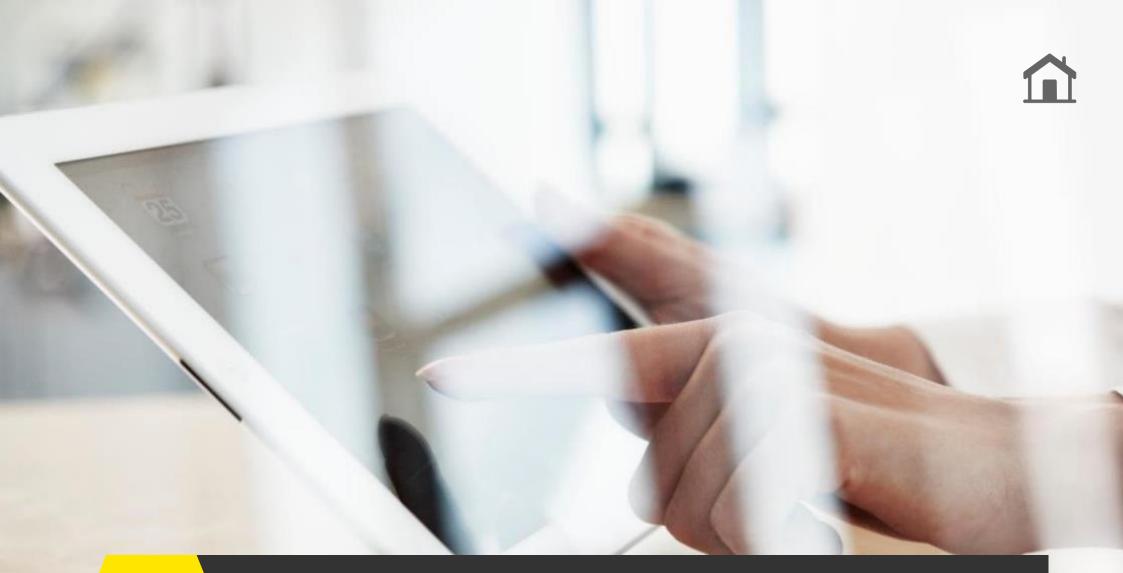


In April 2015 Public Sector Audit Appointments Ltd (PSAA) issued "Statement of responsibilities of auditors and audited bodies". It is available from the via the PSAA website (www.PSAA.co.uk).

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 February 2017)" 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, other members of the Authority and management of Three Rivers District Council in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit Committee, other members of the Authority and management of Three Rivers 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, other members of the Authority and management of Three Rivers District Council for this report or for the opinions we have formed. It should not be provided to any third-party without obtaining our written consent.



Overview of the audit

#### Scope and materiality

In our Audit Plan presented to the 28 March Audit Committee meeting, we gave you an overview of how we intended to carry out our responsibilities as your auditor. We carried out our audit in accordance with this plan.

We planned our procedures using a materiality of £1 million. We reassessed this using the actual year-end figures, which has not changed this amount. The threshold for reporting unadjusted audit differences has remained unchanged at £50,000. The basis of our assessment of materiality has remained consistent with prior years at 2% of gross revenue expenditure.

We also identified areas where misstatement at a lower level than materiality might influence the reader and developed a specific audit strategy for them. They include:

- Remuneration disclosures including any severance payments, exit packages and termination benefits. We applied a lower threshold for errors (£1,000) and any error that would affect the banding (where applicable to the note).
- Related party transactions, the accounting standard requires us to consider the disclosure from the point of materiality to either side of the transaction we therefore considered this on a case by case basis.
- Members' allowances, we applied a lower threshold for errors (£1,000).

#### Status of the audit

We have substantially completed our audit of Three Rivers District Council's financial statements for the year ended 31 March 2017 and have performed the procedures outlined in our Audit plan. Subject to satisfactory completion of the following outstanding items we expect to issue an unqualified opinion on the Authority's financial statements in the form which appears at Section 3, however until work is complete, further amendments may arise:

- Receipt and review of outstanding query responses
- · Review of the final version of the financial statements
- · Completion of subsequent events review
- · Receipt of the signed management representation letter
- Completion of procedures required by the National Audit Office (NAO) regarding the Whole of Government Accounts submission

We expect to issue the audit certificate at the same time as the audit opinion.



## Executive summary (continued)

Status of the audit (continued

We expect to issue the audit certificate at the same time as the audit opinion.

Audit differences

We have identified audit differences with an aggregated impact of £126,000 which have been adjusted by management. Details can be found in Section 4 Audit Differences. There were no unadjusted audit differences.



## Executive summary (continued)

#### Areas of audit focus

Our Audit Plan identified key areas of focus for our audit of Three Rivers District 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.

#### Value for money

We have considered your arrangements to take informed decisions; deploy resources in a sustainable manner; and work with partners and other third parties. In our Audit Plan we identified no significant risks.

We have no matters to report about your arrangements to secure economy efficiency and effectiveness in your use of resources.



## Executive summary (continued)

#### Other reporting issues

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

We have performed the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission. We had no issues to report.

We have no other matters to report.

#### 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.

We noted a deficiency in the preparation of the bank reconciliation, where a closed bank account was not correctly identified and removed until part-way through the next financial year. As this did not impact on the overall reconciliation, and as it has already been rectified, we do not consider it to be a significant deficiency.

#### Independence

Please refer to Appendix B for our update on Independence. We have no matters to report.

## O2 Areas of Audit Focus

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## Areas of Audit Focus

## Audit issues and approach: Revenue Recognition

#### **Revenue Recognition**

#### What is the risk?

Risk of fraud in revenue recognition

Under ISA240 there is a presumed risk that revenue may be misstated due to improper recognition of revenue. In this 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 manipulating expenditure recognition.

#### What are our conclusions?

Our testing has not identified any material misstatements from revenue and expenditure recognition.

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#### What did we do?

We undertook the following:

- We identified the material income streams of the Council and concluded that based on their nature, the ability of the Council to manipulate recognition of revenue in any meaningful way, or to adopt aggressive recognition policies, is low.
- We reviewed the capital programme and noted that due to its materiality, there was the opportunity for the Council to inappropriately recognise revenue expenditure as capital expenditure. We tested a sample of capital additions to ensure appropriate capitalisation and noted no issues.

We have found no evidence inappropriate revenue recognition, or inappropriate capitalisation of revenue expenditure.

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## Areas of Audit Focus

## Audit issues and approach: Management Override

#### Management Override

#### What is the risk?

#### Risk of management override

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

#### What are our conclusions?

We have not identified any evidence of material management override. 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

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#### What did we do?

We undertook the following:

- We tested a sample of accruals, prepayments and provisions to check whether they had been recorded at an appropriate value;
- We undertook cut off testing for income and expenditure to ensure that material amounts had not been omitted from the financial statements that related to 2016/17;
- We tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in preparing the financial statements;
- We evaluated the business rationale for any significant unusual transactions; and
- We reviewed the following accounting estimates for evidence of management bias: pension valuations, business rates appeal provision and asset valuations.

We found no evidence of manipulation of the financial position.



### Areas of Audit Focus

## Audit issues and approach: Business Rates Provision for Appeals

Business Rates Provision for Appeals

#### What is the risk?

Business Rates Provision for Appeals Councils include provisions in their accounts for the future cost of making repayments of business rates to payers who successfully appeal against the rateable value of their property as determined by the local Valuation Office.

#### What are our conclusions?

We are satisfied that the provision is a reasonable assessment of the cost associated with successful business rates appeals relating to 2016/17.

In 2015/16 Three Rivers District Council made a provision of  $\pounds 4.848$  million in its Collection Fund, the Councils share of this was  $\pounds 1.939m$  (40% of the total).

In 2016/17 the Authority made a total provision of £2.2 million, the Council's share of this was £870,000.

This provision is a material estimate based on estimates of the likelihood of success of appeals.

Significant Risk

#### What did we do?

We have considered the provision in line with IAS 37. We are satisfied that it represents a present obligation, since it relates to charges levied by the Council. We are satisfied that there is a probable outflow based on case history in similar instances over previous years. We are satisfied that the estimate is reliable since it relies on expert analysis of active and historic cases.

We have understood the basis of the total provision, which is made up three elements:

- 1. Known appeals
- 2. Appeals not yet lodged
- 3. Contingency

Known appeals are based on information obtained from the Valuation Office Agency (VOA) and interpreted by management's expert.

We checked the underlying information used to calculate the provision by agreeing a sample to the VOA website.

The level of contingency applied is immaterial and therefore has not formed part of our consideration.

We have placed reliance on management's expert as part of our assurance procedures.

## O3 Audit Report

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## Draft audit report

Our opinion on the financial statements

#### INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF THREE RIVERS DISTRICT COUNCIL

Opinion on the Authority's financial statements

We have audited the financial statements of Three Rivers District Council for the year ended 31 March 2017 under the Local Audit and Accountability Act 2014. The financial statements comprise the:

- · Authority Movement in Reserves Statement,
- Authority Comprehensive Income and Expenditure Statement,
- Authority Balance Sheet,
- · Authority Cash Flow Statement,
- the Collection Fund and the related notes CF1 to CF6,
- and the related notes 1 to 36 to the Authority accounts.

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 2016/17.

This report is made solely to the members of Three Rivers 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.

Respective responsibilities of the Chief Financial Officer and auditor

As explained more fully in the Statement of the Chief Financial Officer's Responsibilities set out on page 2, the Chief Financial Officer is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17, and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.



## Audit Report

## Draft audit report (continued)

#### Our opinion on the financial statements

#### Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of: whether the accounting policies are appropriate to the Authority's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Chief Financial Officer; and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the Statement of Accounts 2016/17 to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by us in the course of performing the audit. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

#### Opinion on financial statements

In our opinion the financial statements:

- give a true and fair view of the financial position of Three Rivers District Council as at 31 March 2017 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 2016/17.

Opinion on other matters

In our opinion, the information given in the Statement of Accounts 2016/17 for the financial year for which the financial statements are prepared is consistent with 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; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.



#### Our opinion on the financial statements

Conclusion on Three Rivers District Council's arrangements for securing economy, efficiency and effectiveness in the use of resources

Authority's responsibilities

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

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. The Code of Audit Practice issued by the National Audit Office (NAO) requires us to report to you our conclusion relating to proper arrangements.

We report if significant matters have come to our attention which prevent us from concluding that the Authority has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources in its use of resources are operating effectively.

#### 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, having regard to the guidance on the specified criterion issued by the Comptroller and Auditor General (C&AG) in November 2016, as to whether Three Rivers District Council had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. The Comptroller and Auditor General determined this criterion as that necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether Three Rivers District Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2017.

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, Three Rivers District Council had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

#### Conclusion

On the basis of our work, having regard to the guidance issued by the C&AG in November 2016, we are satisfied that, in all significant respects, Three Rivers District Council put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2017.



#### Our opinion on the financial statements

#### Certificate

We certify that we have completed the audit of the accounts of Three Rivers District Council in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.

Andrew Brittain (senior statutory auditor) for and on behalf of Ernst & Young LLP, Appointed Auditor Reading September 2017

The maintenance and integrity of the Three Rivers District Council web site is the responsibility of the directors; the work carried out by the auditors does not involve consideration of these matters and, accordingly, the auditors accept no responsibility for any changes that may have occurred to the financial statements since they were initially presented on the web site.

Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

# 04 Audit Differences



## Audit differences

In any audit, we may identify misstatements between amounts we believe <u>should</u> be recorded in the financial statements and disclosures and amounts <u>actually</u> 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 highlight the following misstatement in the financial statements identified during the audit. These have been corrected by management:

• £964,000 overstatement of collection fund bad debt provision – this increases the surplus on the provision of services by £126,000 (Three Rivers District Council's share of the provision reduction).

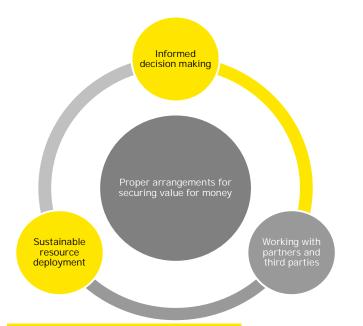
There were no uncorrected misstatements.

## 05 Value for Money

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## Value for Money



#### Economy, efficiency and effectiveness

We must consider whether you have 'proper arrangements' to secure economy, efficiency and effectiveness in your 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.

In considering your proper arrangements, we use the CIPFA/SOLACE framework for local government to ensure that our assessment is made against an already existing mandatory framework which you use in documents such as your Annual Governance Statement.

#### **Overall conclusion**

We did not identify any significant risks around these criteria.

We therefore expect having no matters to report about your arrangements to secure economy, efficiency and effectiveness in your use of resources.





## 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 2016/17 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 Statement of Accounts 2016/17 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 have no issues to report.



## Other reporting issues

#### 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 Authority 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 Authority, 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

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Authority's financial reporting process. They include the following:

- Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- Any significant difficulties encountered during the audit;
- Any significant matters arising from the audit that were discussed with management;
- · Written representations we have requested;
- Expected modifications to the audit report;
- · Any other matters significant to overseeing the financial reporting process;
- · Related parties;
- External confirmations;
- Going concern; and
- Consideration of laws and regulations.

There are no issues to report.

## 07 Assessment of Control Environment



## Assessment of control environment

#### Financial controls

It is the responsibility of the Authority 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 Authority 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.

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.

We have discussed with management whether or not their method for determining the level of bad debt provision associated with the collection fund is appropriate, given the level of the error identified this year. We have suggested an alternative approach to them, which would not result in an error in subsequent years. We appreciate that this area is highly judgemental.



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## Required communications with the Audit Committee

There are certain communications that we must provide to the Audit Committees of UK clients. We have done this by:

		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.
Planning and audit approach	Communication of the planned scope and timing of the audit, including any limitations.	8 February 2017 Audit Plan
Significant findings from the audit	<ul> <li>Our view of the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>Any significant difficulties encountered during the audit</li> <li>Any significant matters arising from the audit that were discussed with management</li> <li>Written representations we have requested</li> <li>Expected modifications to the audit report</li> <li>Any other matters significant to overseeing the financial reporting process</li> </ul>	26 September 2017 Audit Results Report
Going concern	<ul> <li>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</li> <li>Whether the events or conditions constitute a material uncertainty</li> <li>Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>The adequacy of related disclosures in the financial statements</li> </ul>	No conditions or events were identified, either individually or together to raise any doubt about Three Rivers District Council's ability to continue for the 12 months from the date of our report.
Misstatements	<ul> <li>Uncorrected misstatements and their effect on our audit opinion</li> <li>The effect of uncorrected misstatements related to prior periods</li> <li>A request that any uncorrected misstatement be corrected</li> <li>Significant corrected misstatements, in writing</li> </ul>	26 September 2017 Audit Results Report



		Our Reporting to you
Required communications	What is reported?	🛗 💡 When and where
Fraud	<ul> <li>Asking the Audit Committee whether they have knowledge of any actual, suspected or alleged fraud affecting the Authority</li> <li>Unless all those charged with governance are involved in managing the entity, any fraud identified or information obtained indicating that a fraud may exist involving: <ul> <li>(a) management;</li> <li>(b) employees with significant roles in internal control; or</li> <li>(c) others where the fraud results in a material misstatement in the financial statements.</li> </ul> </li> <li>A discussion of any other matters related to fraud, relevant to Audit Committee responsibility.</li> </ul>	We have asked management and those charged with governance about arrangements to prevent or detect fraud. We have not become aware of any fraud or illegal acts during our audit.
Related parties	<ul> <li>Significant matters arising during the audit in connection with the Authority's related parties including, where applicable:</li> <li>Non-disclosure by management</li> <li>Inappropriate authorisation and approval of transactions</li> <li>Disagreement over disclosures</li> <li>Non-compliance with laws and/or regulations</li> <li>Difficulty in identifying the party that ultimately controls the entity</li> </ul>	We have no matters to report.
Subsequent events	<ul> <li>Where appropriate, asking the Audit Committee whether any subsequent events have occurred that might affect the financial statements.</li> </ul>	We have asked management and those charged with governance. We have no matters to report.
Other information	<ul> <li>Where material inconsistencies are identified in other information included in the document containing the financial statements, but management refuses to make the revision.</li> </ul>	We have no matters to report.
External confirmations	<ul> <li>Management's refusal for us to request confirmations</li> <li>We were unable to obtain relevant and reliable audit evidence from other procedures.</li> </ul>	We have received all requested confirmations.
Consideration of laws and/or regulations	<ul> <li>Audit findings of non-compliance where it is material and believed to be intentional. This communication is subject to compliance with legislation on "tipping off"</li> <li>Asking the audit committee about possible instances of non-compliance with laws and/or regulations that may have a material effect on the financial statements, and known to the audit committee.</li> </ul>	We have asked management and those charged with governance. We have not identified any material instances or non- compliance with laws and regulations.



		Our Reporting to you
Required communications	What is reported?	📅 💡 When and where
Significant deficiencies in internal controls identified during the audit	<ul> <li>Significant deficiencies in internal controls identified during the audit.</li> </ul>	26 September 2017 Audit Results Report
Independence	<ul> <li>Communication of all significant facts and matters that have a bearing on EY's objectivity and independence.</li> <li>Communicating key elements of the audit engagement partner's consideration of independence and objectivity such as:</li> <li>The principal threats</li> <li>Safeguards adopted and their effectiveness</li> <li>An overall assessment of threats and safeguards</li> <li>Information on the firm's general policies and processes for maintaining objectivity and independence</li> <li>Communications whenever significant judgments are made about threats to objectivity or independence and the appropriateness of safeguards,</li> </ul>	8 February 2017 Audit Plan 26 September 2017 Audit Results Report
Fee Reporting	Breakdown of fee information when the audit plan is agreed Breakdown of fee information at the completion of the audit Any non-audit work	8 February 2017 Audit Plan 26 September 2017 Audit Results Report
Certification work	Summary of certification work	Certification Report

## Independence

We confirm that there are no changes in our assessment of independence since our confirmation in our audit planning board report dated 8 February 2017.

We complied with the APB Ethical Standards and the requirements of the PSAA's Terms of Appointment. 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 of regulatory and professional requirements.

We consider that our independence in this context is a matter which you should review, as well as us. It is important that the Audit Committee consider the facts known to you and come to a view. If you would like to discuss any matters concerning our independence, we will be pleased to do this at the meeting of the Audit Committee on 26 September 2017.

We confirm we have undertaken non-audit work outside the PSAA Code requirements in relation to our work on.

As part of our reporting on our independence, we set out below a summary of the fees paid for the year ended 31 March 2017.

We confirm that we have not undertaken non-audit work outside the PSAA Code. We have adopted the necessary safeguards in completing this work and complied with Auditor Guidance Note 1 issued by the NAO in December 2016.

Description	Final Fee 2016/17	Planned Fee 2016/17	Scale Fee 2016/17	Final Fee 2015/16
Total Audit Fee - code work	45,563	45,563	45,563	50,523
Grant certification fee	ТВС			£13,244



## Accounting and regulatory update

#### Accounting update

Since the date of our last report to the Audit Committee, new accounting standards and interpretations have been issued. The following table provides a high level summary of those that have the potential to have the most significant impact on you:

Name	Summary of key measures	Impact on Three Rivers District Council
IFRS 15 Revenue from Contracts with Customers	<ul> <li>Applicable for local authority accounts from the 2018/19 financial year. This new standard deals with accounting for all contracts with customers except: <ul> <li>Leases;</li> <li>Financial instruments;</li> <li>Insurance contracts; and</li> <li>for local authorities; Council Tax and NDR income.</li> </ul> </li> <li>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.</li> <li>There are transitional arrangements within the standard; however as the 2018/19 Accounting Code of Practice for Local Authorities has yet to be issued it is unclear what the impact on local authority accounting will be.</li> </ul>	<ul> <li>Some initial thoughts on the approach to adopting IFRS 15 have been issued by CIPFA. However, until the Code is issued there remains some uncertainty. However, what is clear is that for all material income sources from customers the Council will have to: <ul> <li>Disaggregate revenue into appropriate categories</li> <li>Identify relevant performance obligations and allocate income to each</li> <li>Summarise significant judgements</li> </ul> </li> <li>The Council is awaiting clarification of the exact requirements before investing time in the above work.</li> </ul>

## Appendix C

IFRS 16 Leases	IFRS 16 will be applicable for local authority accounts from the 2019/20 financial year.	Until the 2019/20 Accounting Code is issued and any statutory overrides are confirmed there
	Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease in a large number of assets the new standard will have a	remains some uncertainty in this area.
	significant impact, with nearly all current leases being included on the balance sheet.	However, what is clear is that the Council will need to undertake a detailed exercise to classify all of its
	There are transitional arrangements within the standard, although as the 2019/20 Accounting Code of Practice for Local Authorities has yet to be issued it is unclear what the impact on local authority accounting will be or whether any statutory overrides will be introduced.	leases and therefore must ensure that all lease arrangements are fully documented.
		The Council is has yet to commence work in this area due to the timing of implementation.

Appendix C

## Accounting and regulatory update (continued)

Progress report on implementation of new standards and regulations

	hese changes provide challenges for both the preparers and the uditors of the financial statements.
from 2017/18       and approval of accounts will be brought forward with draft accounts needing to be prepared by 31 May and the publication of the audited accounts by 31 July.       To out out out accounts by 31 July.	<ul> <li>o prepare for this change the Council has taken a number of steps as utlined below:</li> <li>Critically reviewed and amended the closedown process</li> <li>Streamlined the Statement of Accounts removing all non-material disclosure notes</li> <li>Brought forward the commissioning and production of key externally provided information such as IAS 19 pension information, asset valuations</li> <li>auditors, nationally we have: <ul> <li>Issued a thought piece on early closedown</li> <li>As part of the strategic Alliance with CIPFA jointly presented accounts closedown workshops across England, Scotland and Wales (NB highlight that sector specific events for Police)</li> <li>Presented at CIPFA early closedown events and on the subject at the Local Government Accounting Conferences in July 2017</li> </ul> </li> <li>ocally we have: <ul> <li>Had regular discussions through the year on the Council's proposals to bring forward the closedown timetable</li> <li>Together with the Council agreed areas for early work which have included testing of major income and expenditure streams at month 9.</li> </ul> </li> </ul>



## Management representation letter

#### Management Rep Letter

Ernst & Young Apex Plaza, Forbury Road, Reading, Berkshire, RG1 1YE, United Kingdom

Three Rivers District Council Management Letter of Representation

This letter of representations is provided in connection with your audit of the council financial statements of Three Rivers District Council ("the Council") for the year ended 31 March 2017. 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 council financial statements give a true and fair view of the Council financial position of Three Rivers District Council as of 31 March 2017 and of its financial performance (or operations) and its cash flows for the year then ended in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 for the Council.

We understand that the purpose of your audit of our 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.

#### 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 2016/17 for the Council.



- 2. 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 2016/17 for the Council.
- 3. We acknowledge, as members of management of the Council, our responsibility for the fair presentation of the council financial statements. We believe the 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 in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 for the Council and are free of material misstatements, including omissions. We have approved the council financial statements.
- 4. The significant accounting policies adopted in the preparation of the Council financial statements are appropriately described in the Council financial statements.
- 5. As members of management of the Council, we believe that the 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 2016/17 for the Council that are free from material misstatement, whether due to fraud or error.
- 6. There are no unadjusted audit differences identified during the current audit and pertaining to the latest period presented.

B. Fraud

- 1. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
- 2. We have disclosed to you the results of our assessment of the risk that the council financial statements may be materially misstated as a result of fraud.
- 3. We have no knowledge of any fraud or suspected fraud involving management or other employees who have a significant role in the Council's internal controls over financial reporting. In addition, we have no knowledge of any fraud or suspected fraud involving other employees in which the fraud could have a material effect on the council financial statements. We have no knowledge of any allegations of financial improprieties, including fraud or suspected fraud, (regardless of the source or form and including without limitation, any allegations by "whistleblowers") which could result in a misstatement of the council financial statements or otherwise affect the financial reporting of the Council.
- C. Compliance with Laws and Regulations

1. We have disclosed to you all identified or suspected non-compliance with laws and regulations whose effects should be considered when preparing the consolidated and council financial statements.



D. 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 are reflected in the council financial statements.
- 3. We have made available to you all minutes of the meetings of the Council, and committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year to the most recent meeting on the following date: 14<sup>th</sup> September 2017.
- 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 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 council financial statements.
- 5. We believe that the significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.
- 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 council financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
- E. 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 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 litigation and claims, both actual and contingent, and have disclosed in Note 33 to the council financial statements all guarantees that we have given to third parties.



- F. Subsequent Events
- 1. As described in Note 5 to the council financial statements, there have been no events subsequent to year end which require adjustment of or disclosure in the council 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 statement of accounts.
- 2. We confirm that the content contained within the other information is consistent with the financial statements.
- H. Expenditure Funding Analysis
- 1. We have reviewed the new requirements (as set out in the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17), in relation to the preparation of the Expenditure Funding Analysis to replace the previous segmental reporting analysis, and confirm that all required amendments to the Comprehensive Income and Expenditure Statement and Movement in Reserves Statement, as well as the requirements to prepare the Expenditure Funding Analysis and related notes have been correctly reflected in the financial statements, including retrospectively reflecting this in the financial statements.
- 2. We confirm that the financial statements reflect the operating segments reported internally to the Council.
- I. Ownership of Assets
- 1. There are no assets capitalised under finance leases. The Council has satisfactory title to all assets appearing in the balance sheets, and there are no liens or encumbrances on the Council's assets, nor has any asset been pledged as collateral. All assets to which the Council has satisfactory title appear in the balance sheets.
- 2. All agreements and options to buy back assets previously sold have been properly recorded and adequately disclosed in the council financial statements.
- J. Use of the Work of a Specialist
- 1. We agree with the findings of the specialists that we engaged to evaluate the valuation of assets and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the 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.



- K. Business Rates Appeals Provisions Estimate
- 1. We believe that the measurement processes, including related assumptions and models, used to determine the accounting estimate have been consistently applied and are appropriate in the context of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.
- 2. We confirm that the disclosures made in the council financial statements with respect to the accounting estimate are complete and made in accordance with CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.
- 3. We confirm that no adjustments are required to the accounting estimate and disclosures in the council financial statements due to subsequent events.
- L. 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,

**Director of Finance** 

Chair of the Audit Committee

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#### ED None

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