



PUBLIC SECTOR

# Bury Metropolitan Borough Council

Financial Statements Audit Plan 2010/11

January 2011

AUDIT

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This report is addressed to the Council and has been prepared for the sole use of the Council. We take no responsibility to any member of staff acting in their individual capacities, or to third parties. The Audit Commission has issued a document entitled Statement of Responsibilities of Auditors and Audited Bodies. This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. We draw your attention to this document. External auditors do not act as a substitute for the audited body's own responsibility for putting in place proper arrangements to ensure that public business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact Trevor Rees, who is the engagement partner to the Council, telephone: 0161 246 4063 email: trevor.rees@kpmg.co.uk who will try to resolve your complaint. After this, if you are still dissatisfied with how your complaint has been handled you can access the Audit Commission's complaints procedure. Put your complaint in writing to the Complaints Investigation Officer, Westward House, Lime Kiln Close, Stoke Gifford, Bristol, BS34 8SR or by e mail to: complaints@audit-commission.gov.uk. Their telephone number is 0844 798 3131, textphone (minicom) 020 7630 0421

# Summary

## Our audit is divided into:

- use of resources; and
- financial statements.

This document describes how we will deliver our audit work for Bury Metropolitan Borough Council.

Our statutory responsibilities and powers are set out in the Audit Commission Act 1998, the Local Government Act 1999 and the Audit Commission's *Code of Audit Practice (the Code)*.

The Audit Commission's Code summarises our responsibilities into two objectives, requiring us to review and report on your:

- *financial statements (including the Annual Governance Statement)*: providing an opinion on your accounts; and
- *use of resources*: concluding on the arrangements in place for securing economy, efficiency and effectiveness in your use of resources (the value for money conclusion).

The Audit Commission's Statement of Responsibilities of Auditors and Audited Bodies sets out the respective responsibilities of the auditor and the Council. The table below summarises the work we will do this year.

Our Responsibility	Risks, Proposed work and output
<p><b>Financial Statements and Annual Governance Statement</b></p>	<p>Key risks identified are as follows:</p> <ul style="list-style-type: none"> <li>● Implementation of International Financial Reporting Standards: All local authorities are required to implement IFRS in 2010/11, including restating prior period figures. This will result in some fundamental differences in accounting and has required significant planning to ensure your financial statements reflect the new standards (see page 6 for more details).</li> <li>● Equal Pay provision: The Council needs to ensure that the provision is appropriate and has been calculated based on up to date and accurate data.</li> <li>● Medium term financial plan: The Council needs to make significant cost savings over the next four years in light of the Comprehensive Spending Review.</li> </ul> <p>Our work will encompass:</p> <ul style="list-style-type: none"> <li>● Review of the controls over the completion of the accounts, relying on Internal Audit wherever possible to avoid duplication.</li> <li>● A detailed audit of the financial statements, associated disclosure notes and the Annual Governance Statement.</li> <li>● Review of the key risks identified, addressed through our detailed audit work and discussions with senior finance officers.</li> </ul> <p><b><i>The findings of this work support the audit opinion that we issue on your financial statements.</i></b></p>
<p><b>Use of Resources / Value for Money work</b></p>	<ul style="list-style-type: none"> <li>● In response to the changing financial environment, the Audit Commission has introduced a new approach to local value for money (VFM) work at those bodies previously subject to a use of resources (UoR) assessment. The new, more focused approach could reduce the work auditors do to meet their statutory VFM responsibilities.</li> </ul> <p>Our work will encompass:</p> <ul style="list-style-type: none"> <li>● A risk assessment to identify the amount and focus of local VFM work.</li> <li>● Where applicable, undertaking local VFM work to address the risks identified in the risk assessment.</li> </ul> <p><b><i>The findings of this work will inform our value for money conclusion.</i></b></p>

The audit planning process and risk assessment is an on-going process and the assessment and fees in this plan will be kept under review and updated if necessary. The remainder of this document provides details of our risk assessment, proposed work and fees for our work on the financial statements audit. It supplements the high level audit plan presented earlier in 2010. We will provide further details separately on our VFM audit work.

# Audit overview

**We undertake our work on your financial statements and Annual Governance Statement (AGS) in four key stages.**

**Our work results in our audit opinion on your financial statements.**

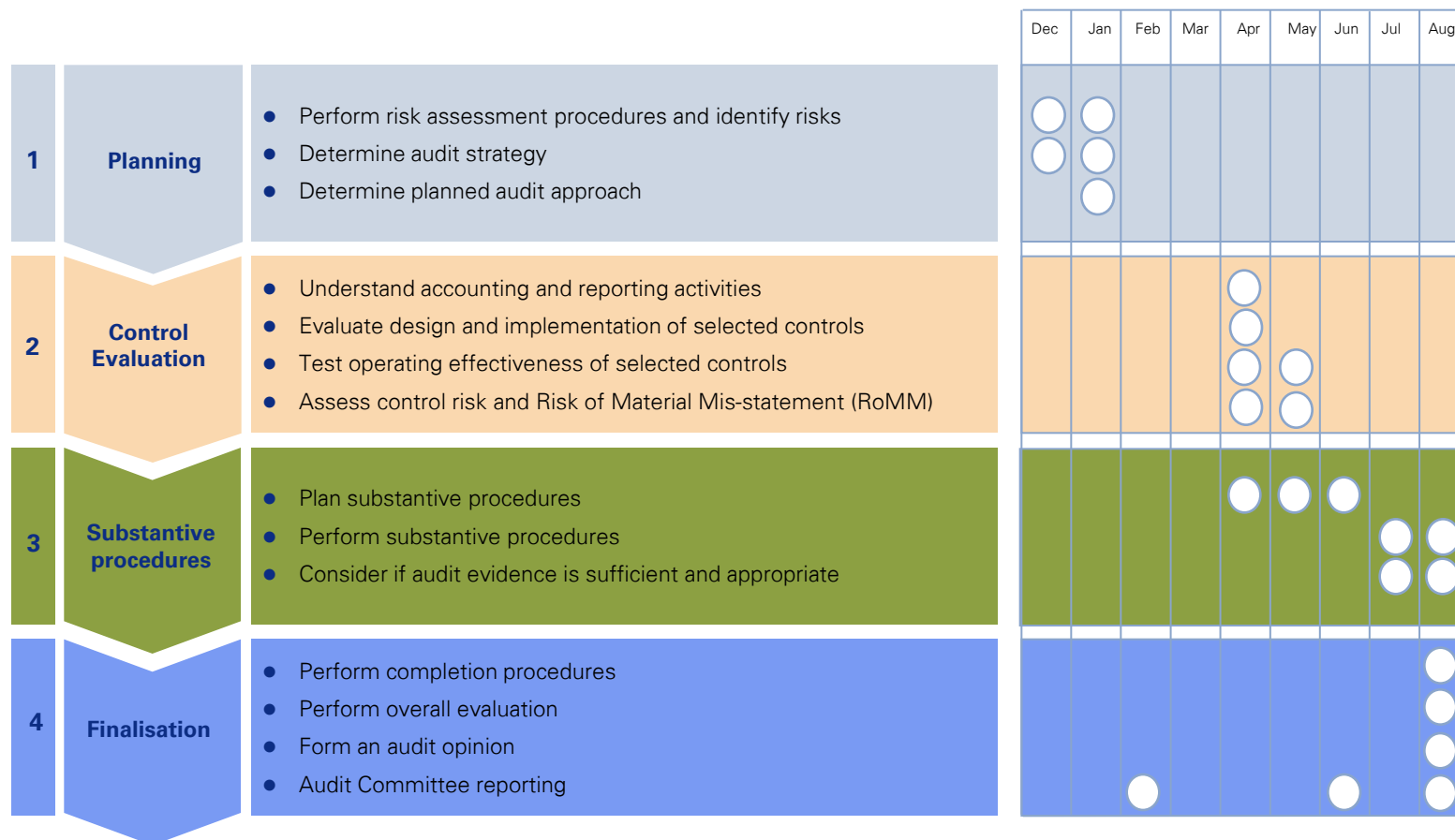
We are required to satisfy ourselves that your accounts comply with statutory requirements and that proper practices have been observed in compiling them. We are required to provide an audit opinion on the accounts.

We are also required to satisfy ourselves that your Annual Governance Statement is consistent with our understanding of your operations. Our review of the work of Internal Audit and consideration of your risk management and governance arrangements are key to this opinion.

In addition to the Council's financial statements which includes the consolidated group accounts, we are also required to audit and provide an opinion on the Whole of Government Accounts return submitted to central government.

## Our Audit Process

We have summarised the four key stages of our financial statements audit process for you below:



# Audit overview (continued)

**We work with your finance team and Internal Audit team to enhance the efficiency of the accounts audit.**

## **Our Audit Process (continued)**

As part of our audit process, we will work closely with the finance team to understand and continually improve the accounts production process. At the interim stage of our audit we will issue the Council with a 'prepared by client' list which will include a detailed schedule of information requests to support the financial statements.

Our audit procedures also include an assessment of your arrangements to deliver your responsibilities to prevent and detect fraud. The auditing standard for fraud, ISA240 (revised), responds to the increased sensitivity to fraud and the importance given to auditors' work on fraud. Additionally, the Fraud Act 2006 and the Government Review of Fraud 2006 may impact on your responsibilities to manage fraud.

## **Liaising with Internal Audit**

We have a strong working relationship with Internal Audit and we will continue to work closely with them to maximise the use of their work on core financial systems and governance at the Council.

## **International Financial Reporting Standards (IFRS)**

All Local Authorities are required to implement IFRS for 2010/11 financial statements. This replaces the current practice of reporting under UK GAAP (Generally Accepted Accounting Practice). We will continue to work closely with the finance team to ensure the smooth transition to IFRS. We will audit the restated 2009/10 balances prior to the final visit in order to provide early assurance on key aspects of your IFRS migration work and identify any issues on a timely basis. This will also ensure some accounting and audit effort is brought forward to alleviate the busy closedown and final accounts audit season.

## **Whole of government accounts (WGA)**

KPMG are required to review and report on your WGA consolidation pack in accordance with the approach agreed with HM Treasury and the National Audit Office. The 2010/11 WGA consolidated pack will need to be produced in accordance with the International Financial Reporting Standards (IFRS).

## **National Fraud Initiative**

The Council participates in the National Fraud Initiative, which is the Audit Commission's computerised data matching exercise designed to detect fraud perpetrated against public bodies. During our audit we will review the Council's progress and actions in following up the matches identified.

## **Elector Challenge**

The Audit Commission Act 1998 gives electors certain rights. These are:

- the right to inspect the accounts;
- the right to ask the auditor questions about the accounts; and
- the right to object to the accounts.

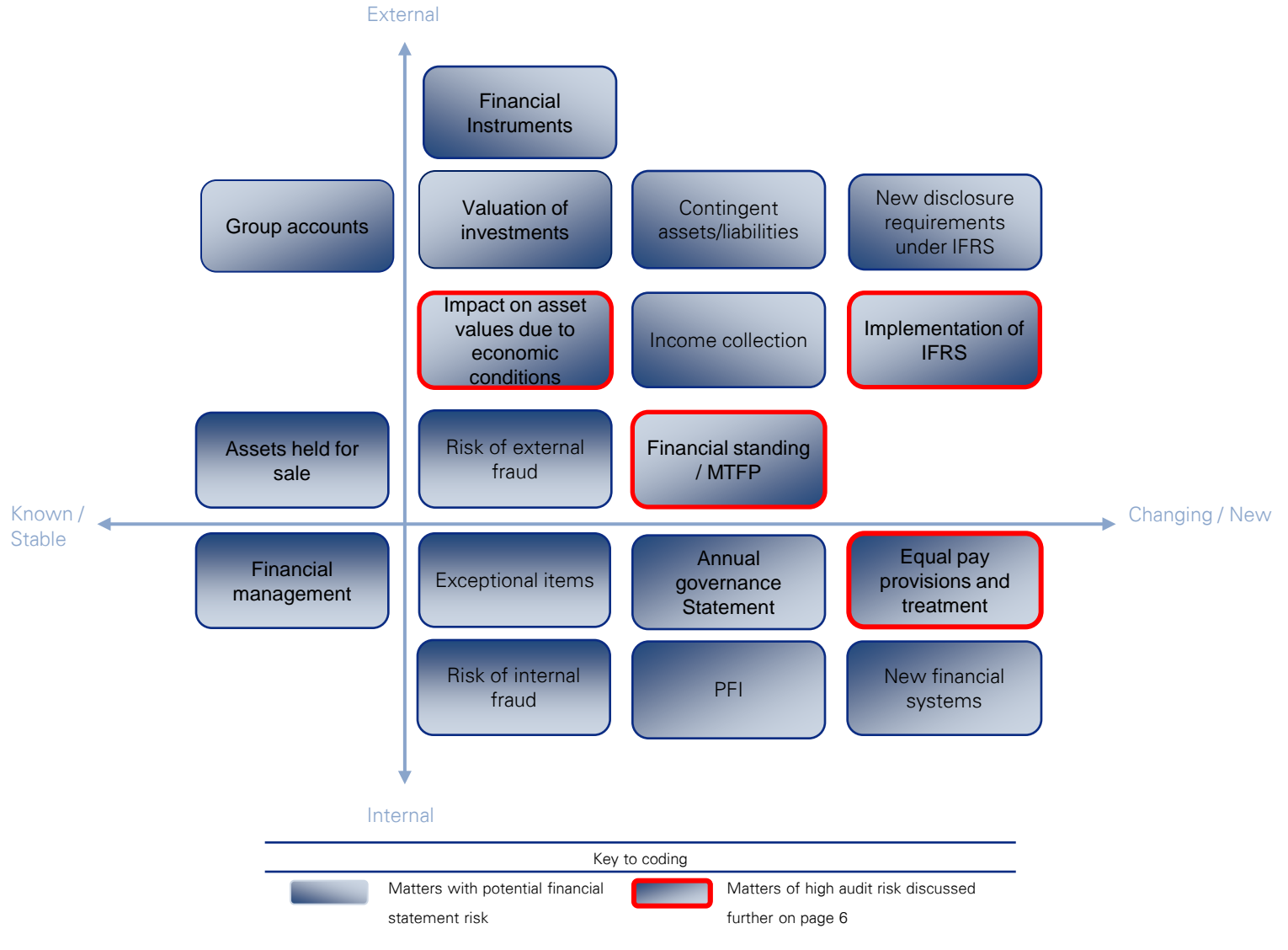
As a result of these rights, in particular the right to object to the accounts, we may need to undertake additional work to form our decision on any elector's objection. The additional work could range from a small piece of work where we interview an officer and review evidence to form our decision, to a more detailed piece of work, where we have to interview a range of officers, review significant amounts of evidence and seek legal representations on the issues raised. The costs incurred in responding to questions or objections raised by electors are not covered by our audit fee. This work will be charged in accordance with the Audit Commission's fee scales.

# Key financial statement audit risks

These are the key financial statement risks identified for 2010/11 and some examples of other risks that we will consider during the audit. We seek to tailor our audit approach to reflect this risk assessment.

We have identified high audit risks in the following areas:

- Implementation of IFRS;
- Financial Standing / MTFP following the CSR;
- Asset Values; and
- Equal Pay provision and treatment.



# Key financial statement audit risk - IFRS

For each key risk audit area we have outlined the impact on our audit plan.

We will provide updates to the Audit Committee on these risk issues throughout our audit.

Transitions to IFRS represents the largest change in accounting for a number of years. We have detailed within the next slides the major implications of the new standards and how our audit work will be adapted to address these key risks.

## Key audit risks



### Audit areas affected

- Restated opening balances and comparatives
- Various balances and disclosures within 2010/11 financial statements



### Audit areas affected

- Lease classification
- Disclosures

## Issue and Impact on audit plan

### IFRS conversion process

For the year ended 31 March 2011 Local Authorities are required to implement IFRS.

### Impact of conversion process

- The Council will require a lot of planning and resources to ensure a smooth and successful transition to IFRS.

### Our audit work

- We will audit the re-stated 2009/10 financial statement figures in February. During this time we will assess the processes being undertaken by the Council and provide advice on how this can be improved to ensure the final years figures are compliant with the standards.
- We will keep in regular contact with the finance team during this period, discussing emerging issues and current guidelines.
- During the final accounts audit we will audit all figures in line with IFRS.

### Leases

### Expected Impact of IAS 17

- There is likely to be an increased number of finance leases as IAS 17 gives a broader definition of finance leases than SSAP 21 resulting in more assets coming on to the balance sheet.

### Our audit work

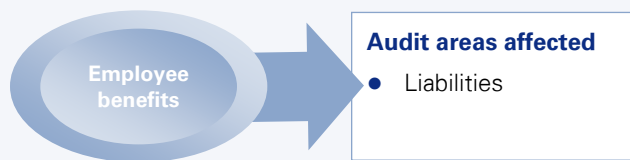
- During the restatement audit we will assess the Council's process for ensuring that there is a complete record of all leases and these are reviewed against the requirements of IAS 17.
- During the final phase we will review all material leases and contracts to determine whether they have been correctly treated as an operating lease or finance lease under IAS 17.

# Key financial statement audit risk – IFRS (continued)

For each key risk audit area we have outlined the impact on our audit plan.

We will provide updates to the Audit Committee on these risk issues throughout our audit.

## Key audit risks



## Issue and Impact on audit plan

### Employee benefits

#### Expected Impact of IAS 19

- A new liability will be recognised on the balance sheet where there is a requirement to pay wages and salaries, bonuses and holiday pay.

#### Our audit work

- We have performed an initial review of the Council's process and calculation of the holiday pay accrual.
- During the final process we will audit the balance using the data collated by the Council to ensure it is line with the requirements of the standard.

### Property, plant and equipment

#### Expected impact of IAS 16

- Local authorities are required to component account for any additions or valuations on or after 1 April 2010. This means when an item of property, plant and equipment comprises individual components for which significantly different depreciation methods or rates are appropriate each component is accounted for separately. For example, a house will be split between structure, roof, windows and any other significant components.

#### Our audit work

- During the interim visit we will assess the controls in place to ensure that additions/valuations are being addressed as components and appropriately recorded in the fixed asset register.
- During the final phase of our audit we will substantively test additions and valuations to ensure that these are correctly accounted for in line with the component requirements of IAS 16.

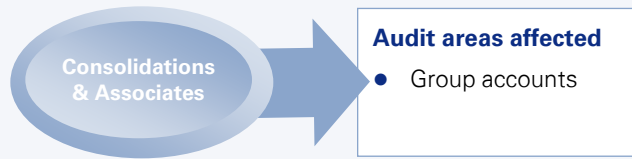


# Key financial statement audit risk – IFRS (continued)

For each key risk audit area we have outlined the impact on our audit plan.

We will provide updates to the Audit Committee on these risk issues throughout our audit.

## Key audit risks



## Impact on audit plan

### Consolidations and Associates

#### Expected impact of IAS 27 & 28

- UK GAAP emphasises the **substance** of control, e.g. rather than legal voting rights, whereas IFRS considers the **power** to control. As a result there may be a different interpretation of those entities consolidated into group financial statements.

#### Our audit work

- During the restatement audit we will consider the Council's evaluation of its relationships with external parties to assess whether they should now be consolidated under the new standards.
- We will audit the consolidated statements during the final phase in line with IAS 27 & 28.

# Key financial statement audit risks (continued)

For each key risk audit area we have outlined the impact on our audit plan.

We will provide updates to the Audit Committee on these risk issues throughout our audit.

Impairment continues to be a key risk that the Council will need to monitor and reflect in their financial statements accordingly.

The Equal Pay Provision again creates an audit as there is still a level of uncertainty associated with this provision.

We have detailed the audit work we will perform to address these issues.

## Key audit risks



## Issue and Impact on audit plan

### Impact on asset values of economic conditions

Due to challenging market conditions there continues to be a risk of impairment associated with Council assets and the recent capital developments. The Council needs to ensure they remain aware of any indicators of impairment to specific assets and that they adequately carry out impairment reviews.

### Our audit work

- We will review third party valuations obtained by the Council to ensure that asset values have been correctly recorded in asset registers and the financial statements.
- We will assess valuation assumptions for appropriateness.
- We will review the Council's processes for identifying assets which may require impairment and consider whether these impairments have been accounted for correctly within the financial statements.

### Equal Pay Provision

Following the outcome of the equal pay legal case in 2010 and the latest appeal in 2011 it is likely that the Council will still hold a significant provision on the balance sheet at year end. The Council needs to reflect the latest position in relation to the case in the financial statements.

### Our audit work

- We will review the provision included in the accounts to ensure that this is sufficient and is based on the latest information available at 31<sup>st</sup> March 2011.
- We will discuss the matter with management during the course of the year and will take into consideration any changes arising when completing our substantive audit work.

# Key financial statement audit risks (continued)

For each key risk audit area we have outlined the impact on our audit plan.

We will provide updates to the Audit Committee on these risk issues throughout our audit.

The implications of the CSR mean that financial standing and MTFP are of increasing importance to the Council. We have detailed how our audit work will cover the associated risks.

## Key audit risks



## Issue and Impact on audit plan

### Financial Standing / MTFP

The Council will face challenging financial conditions over the coming years. The findings of the Comprehensive Spending Review (CSR) are of particular importance as the Council will be required to find significant cost savings over the next four years.

The Council is making steady progress towards developing its savings plans. It is recognised that this is a challenging time for all councils and that financial planning and monitoring will be critical to achieving a balanced and sustainable budget over the coming years.

### Our audit work

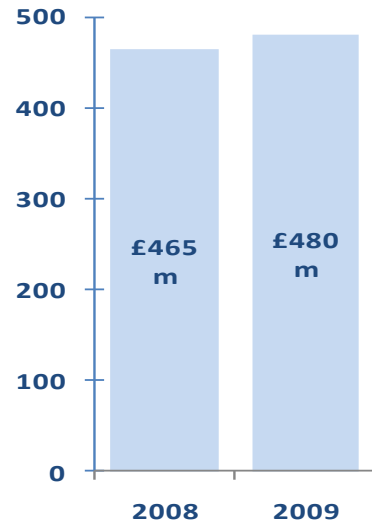
- Linking with our value for audit work, we will consider the Council's general financial standing and in particular its approach to medium term financial planning.
- We will consider the potential impact of the outcome from this work on our financial statements audit.

# Materiality

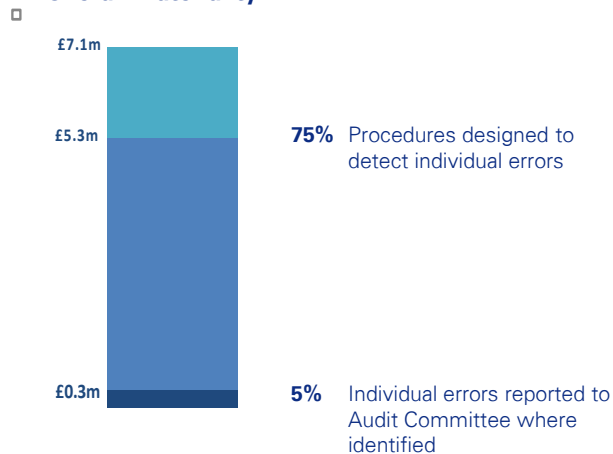
Our audit work is planned to detect errors that are material to the accounts as a whole.

Our materiality for this year is £7.1m

Our 'benchmark' for materiality - Total revenues



Overall Materiality



Note: Materiality may be updated on receipt on the draft financial statements  
 Source: 2009/10 Audited Financial Statements

## What do we mean by materiality?

Materiality is the margin of error we will accept before we qualify our opinion on the accounts. Information is considered to be material if its omission or misstatement could influence the economic decisions of users taken on the basis of the financial statements.

## Why do we have a level of materiality?

To make our sample testing most effective, our work is driven by an assessment of risk and a level of materiality. This means we sample test the transactions that are more likely to be prone to significant fraud or error.

Audit opinions refer to accounts presenting a 'true and fair' view of a council's financial affairs. This means that errors may exist in the financial statements, but they are not significant enough to affect the fair representation of the financial affairs of the organisation.

## Determining materiality

- We consider quantitative and qualitative factors in setting materiality and in designing our audit procedures.
- Materiality has been set at an indicative level of £7.1 million which is 2% of total revenues in 2009/10.
- We design our procedures to detect errors at a lower level of precision, i.e. £5.3 million.
- We have some flexibility to adjust this level downwards. We do this when our risk assessment indicates balances that may have a greater risk of error.

## Reporting to Audit Committee

- We will report any errors greater than £0.3 million to the Audit Committee.
- To comply with auditing standards, the following three types of audit differences will be presented to the Audit Committee:
  - summary of adjusted audit differences
  - summary of unadjusted audit differences
  - summary of disclosure differences (adjusted and unadjusted).
- We will not report audit and disclosure differences that are considered to be trivial.

# Audit team

Our audit team were all part of the Bury Metropolitan Borough Council audit last year. Contact details are shown on page 1.

The audit team will be assisted by other specialist KPMG staff as necessary.



Trevor Rees  
**Engagement Lead**

My role is to lead our team and ensure the delivery of a high quality external audit opinion. I will be the main point of contact for the Audit Committee and the Chief Executive.



Heather Garrett  
**Audit Manager**

I will direct and help coordinate the audit and will work closely with Trevor Rees to ensure we add value. I will be the main contact for the Director of Finance and E-Government and other executive directors.



Gemma Douse  
**Audit Assistant Manager**

I will be your day to day contact and will work closely with Heather Garrett to deliver a coordinated and efficient audit.

# Independence confirmation

**Our independence and objectivity responsibilities under the Code are summarised in Appendix 3.**

**We confirm our audit team's independence and objectivity is not impaired.**

## **Independence and objectivity confirmation**

Professional standards require auditors to communicate to those charged with governance, at least annually, all relationships that may bear on the firm's independence and the objectivity of the audit engagement partner and audit staff. The standards also place requirements on auditors in relation to integrity, objectivity and independence.

The ISA defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case this is the Audit Committee.

KPMG LLP is committed to being and being seen to be independent. APB Ethical Standard 1 *Integrity, Objectivity and Independence* requires us to communicate to you in writing all significant facts and matters, including those related to the provision of non-audit services and the safeguards put in place, in our professional judgement, may reasonably be thought to bear on KPMG LLP's independence and the objectivity of the Engagement Lead and the audit team.

## **Confirmation statement**

We confirm that as of January 2011, in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the Appointed Auditor and audit team is not impaired.

# Audit fees

**The audit fee has not changed from that agreed in the high level audit strategy in April 2010.**

We agreed our fee for the audit with the Council earlier this year. The fee is calculated with reference to a number of factors including your turnover and our assessment of audit risk and control environment. This year's fee is consistent with that of the prior year (2009/10 = £285,500). However, this includes additional audit costs associated with the implementation of IFRS, that the Council has been reimbursed directly by the Audit Commission for these one-off costs.

Element of the audit	Fee 2010/11
Audit of Financial Statements	£285,500
Reimbursement of audit fee from Audit Commission in respect of IFRS work	(£17,028)
<b>TOTAL AUDIT FEE</b>	<b>£268,472</b>
Certification of claims and returns (estimate)	£36,000

To enable you to benchmark our fee proposal we provide below some comparative information.

Source of fee comparative / benchmark	£
Audit Commission suggested fee range	£198,000 - £367,000
Audit Commission suggested scale fee	£283,000
2010/11 audit fee	£285,500

# Audit fees (continued)

**Our audit fee is indicative and based on you meeting our expectations of your support.**

**Meeting these expectations will help to the delivery of our audit within the proposed audit fee.**

## **Audit fee assumptions**

The audit fee is indicative and is based on you meeting our agreed expectations as outlined in Appendix 2. In setting the fee, we have assumed:

- the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2009/10;
- you will inform us of any significant developments impacting on our audit;
- you will identify and implement any changes required under the CIPFA Code of Practice on Local Council Accounting within your 2010/11 financial statements (note 2010/11 is the first year based on IFRS);
- your financial statements are made available for audit in line with the agreed timescales;
- you will make available the re-stated 2009/10 figures in line with the agreed timescales and ensure they are in line with IFRS requirements;
- good quality working papers and records will be provided at the start of the final accounts audit;
- requested information will be provided within the agreed timescales;
- prompt responses will be provided to queries and draft reports;
- Internal Audit meets appropriate professional standards;
- Internal Audit completes appropriate work on all systems that provide material figures for the financial statements and we can place reliance on them for our audit; and
- additional work will not be required to address questions or objections raised by local government electors.

Meeting these expectations will help ensure the delivery of our audit within the agreed audit fee.

## **Changes to the audit plan**

Changes to this plan and the audit fee may be necessary if:

- new significant audit risks emerge;
- additional work is required of us by the Audit Commission or other regulators; and
- additional work is required as a result of changes in legislation, professional standards or financial reporting requirements.

If changes to this plan and the audit fee are required, we will discuss and agree these initially with the Director of Finance and E-Government.



# Audit timeline & deliverables

Our key deliverables will be delivered to a high standard and on time.

We will discuss and agreed each report with the Council's officers prior to publication.

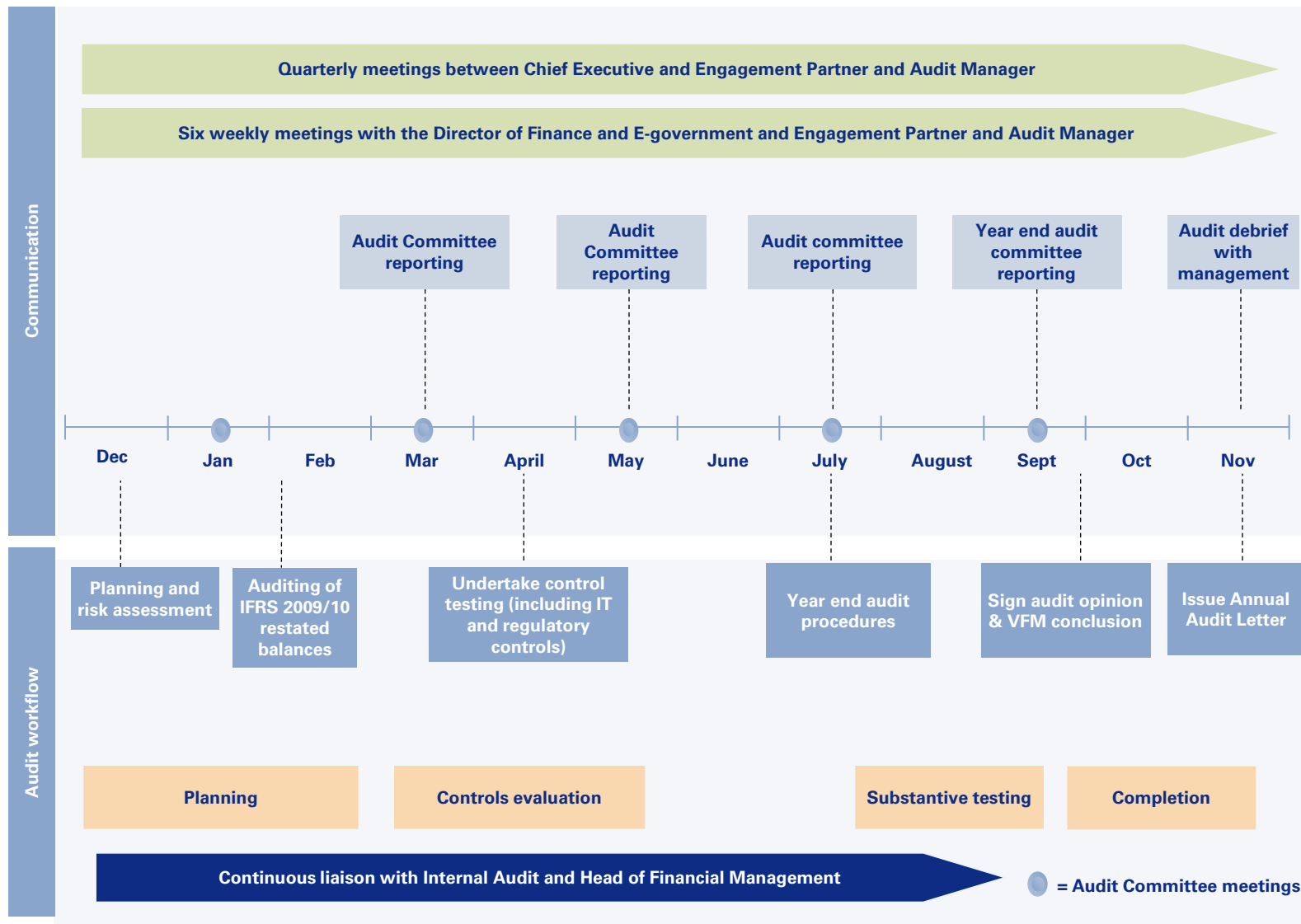
Deliverable	Purpose	Timing
<b>Planning</b>		
<b>Audit plan</b>	<ul style="list-style-type: none"> <li>Outline audit approach</li> <li>Identify areas of audit focus and planned procedures</li> <li>Confirm plan with Audit Committee</li> </ul>	<b>February 2011</b>
<b>Interim</b>		
<b>Interim report</b>	<ul style="list-style-type: none"> <li>Details and resolution of control and process issues</li> </ul>	<b>June 2011</b>
<b>Report on restated 2009/10 figures</b>	<ul style="list-style-type: none"> <li>Feedback on audit work undertaken on 2009/10 restated balances in line with IFRS</li> <li>Identify areas of improvement to ensure 2010/11 financial statements are fully compliant with IFRS</li> </ul>	<b>June 2011</b>
<b>Year end audit</b>		
<b>Report to those charged with governance (ISA 260)</b>	<ul style="list-style-type: none"> <li>Commentary on Bury Metropolitan Borough Council financial statements</li> <li>Commentary on Bury Metropolitan Borough Council's value for money arrangements</li> <li>Details the resolution of key audit issues</li> <li>Communication of adjusted and unadjusted audit differences</li> <li>Performance improvement recommendations identified during our audit</li> </ul>	<b>By September 2011</b>
<b>Opinion on financial statements</b>	<ul style="list-style-type: none"> <li>Independent auditors' report to the Members of Bury Metropolitan Borough Council</li> </ul>	<b>By September 2011</b>
<b>Annual audit letter</b>	<ul style="list-style-type: none"> <li>Summarises the audit we have performed with key audit issues and outputs</li> </ul>	<b>November 2011</b>

# Audit timeline & deliverables (continued)

Key formal interactions with the Audit Committee are:

- June: Interim issues
- September: Year end conclusions.

We will be in continuous dialogue with you throughout the audit.



# Appendix 1: Meeting your expectations

## How we will conduct ourselves

### *Communications*

- We will be proactive in developing relationships with your staff where our audit work requires their input.
- We will ensure that all letters and emails are answered within five working days of receipt. All telephone messages received will receive a prompt response, either by the individual concerned or by Gemma Douse.
- We will ensure that all recommendations, and in particular those relating to our performance management work, are included within our Annual Audit Letter only after having been agreed with relevant Directors.
- Trevor Rees or Heather Garrett will attend Audit Committee meetings and ensure that other relevant KPMG staff are invited as appropriate.
- We have been working with you throughout 2009/10 providing guidance on key issues in the transition to IFRS. We will continue working with the finance team to provide advice and review progress during 2010/11.

### *Working together*

- We will ensure that the Director of Finance, Chief Accountant and other key members of staff are kept informed of the progress of our audit work throughout the year.
- We will liaise with staff at all levels of the Council to ensure that our work is appropriately planned and completed and where recommendations are made these are agreed with the likely responsible officer.

### *Cooperating with the Council*

- We will continue to coordinate our work with that of Internal Audit and ensure that we provide appropriate proactive commentary to the finance function on issues that affect the Council's accounts.
- We will respond promptly to requests for comment on aspects of the Council's operations, where appropriate.

## Our expectations of your support

### *Audit Plan*

- Brief our staff on key issues affecting the Council.
- Review and agree the draft plan.

### *Interim Audit*

- Facilitate the completion of Internal Audit's work (particularly on core financial systems) to timetable.
- Ensure that key officers are available for the duration of our audit.
- Respond to and agree our draft reports in good time.

### *Accounts Audit*

- Ensure that a full draft of the accounts is available at least one week prior to the agreed start date of our audit, and that only agreed adjustments are put into the accounts following receipt of this draft.
- Produce the documents listed within our prepared by client request by the agreed start date of our audit.
- Ensure that the mandatory content of the Annual Report is available at the agreed time of our final account audit.

### *Annual Audit Letter*

- Discuss and agree our draft Annual Audit Letter in good time for the Audit Committee.
- Ensure that all action plans are agreed and followed up in due course.

### *IFRS*

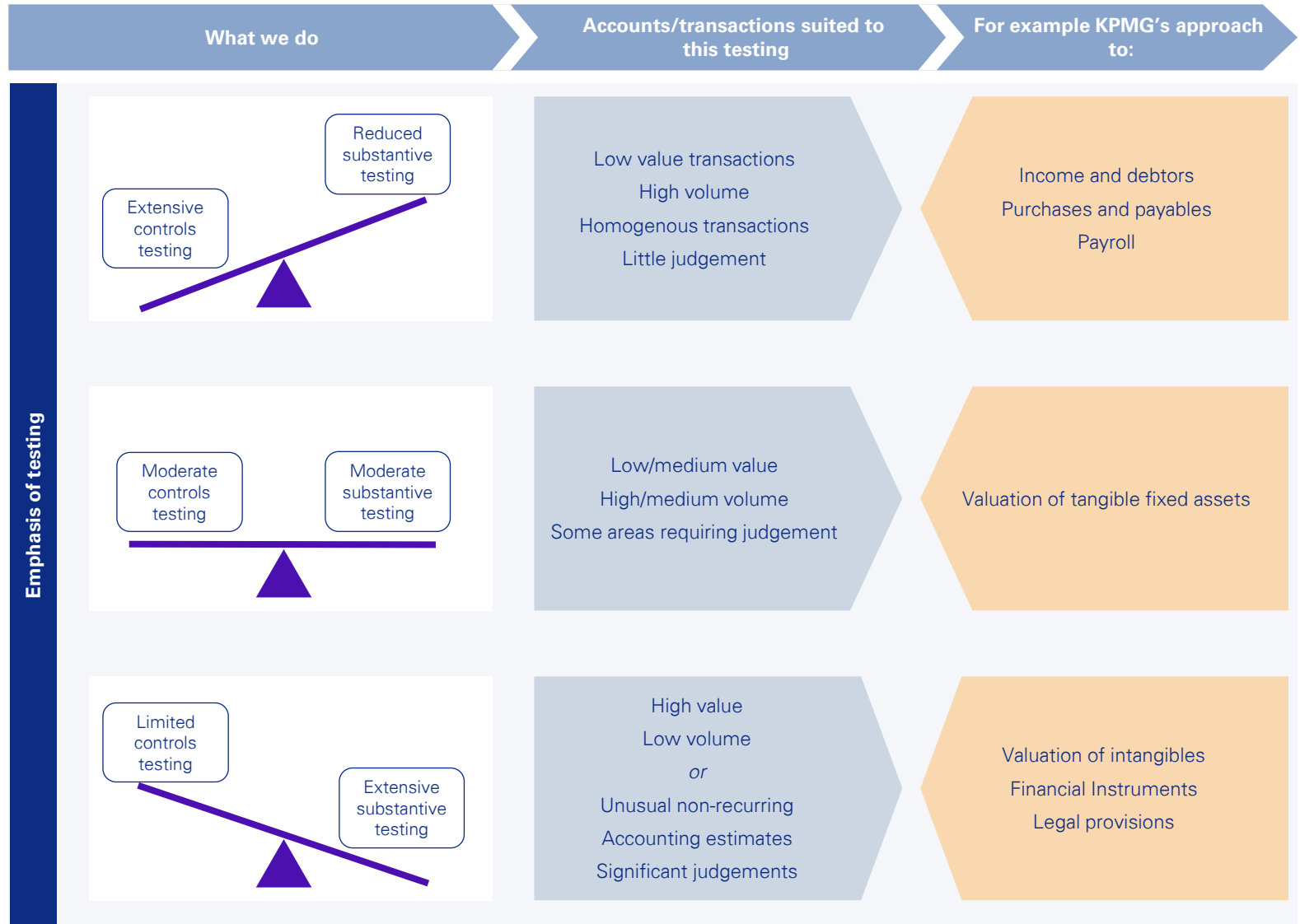
- Ensure a full set of 2009/10 restated figures compliant with IFRS are available to audit in good time prior to the final visit.

### *Other work*

- Agree a key Council contact as a focal point for the study or work.
- Discuss and review our findings so that action plans can be fully completed and implemented.

# Appendix 2: Balance of internal controls and substantive testing

This appendix illustrates how we determine the most effective balance of internal controls and substantive audit testing



Note: Assuming controls are found to operate as designed

# Appendix 3: Independence and objectivity requirements

This appendix summarises auditors' responsibilities regarding independence and objectivity.

## Independence and objectivity

Auditors are required by the Code to:

- carry out their work with independence and objectivity;
- exercise their professional judgement and act independently of both the Commission and the audited body;
- maintain an objective attitude at all times and not act in any way that might give rise to, or be perceived to give rise to, a conflict of interest; and
- resist any improper attempt to influence their judgement in the conduct of the audit.

In addition, the Code specifies that auditors should not carry out work for an audited body that does not relate directly to the discharge of the auditors' functions under the Code. If the Council invites us to carry out risk-based work in a particular area, which cannot otherwise be justified to support our audit conclusions, it will be clearly differentiated as work carried out under section 35 of the Audit Commission Act 1998.

The Code also states that the Commission issues guidance under its powers to appoint auditors and to determine their terms of appointment. The Standing Guidance for Auditors includes several references to arrangements designed to support and reinforce the requirements relating to independence, which auditors must comply with. These are as follows:

- Any staff involved on Commission work who wish to engage in political activity should obtain prior approval from the Partner.
- Audit staff are expected not to accept appointments as lay school inspectors.
- Firms are expected not to risk damaging working relationships by bidding for work within an audited body's area in direct competition with the body's own staff without having discussed and agreed a local protocol with the body concerned.
- Auditors are expected to comply with the Commission's statements on firms not providing personal financial or tax advice to certain senior individuals at their audited bodies, auditors' conflicts of interest in relation to PFI procurement at audited bodies, and disposal of consultancy practices and auditors' independence.
- Auditors appointed by the Commission should not accept engagements which involve commenting on the performance of other Commission auditors on Commission work without first consulting the Commission.
- Auditors are expected to comply with the Commission's policy for the Engagement Lead to be changed on each audit at least once every five years (subject to agreed transitional arrangements). Audit suppliers are required to obtain the Commission's written approval prior to changing any Engagement Lead in respect of each audited body.
- Audit suppliers are required to obtain the Commission's written approval prior to changing any Engagement Lead in respect of each audited body.
- The Commission must be notified of any change of second in command within one month of making the change. Where a new Engagement Lead or second in command has not previously undertaken audits under the Audit Commission Act 1998 or has not previously worked for the audit supplier, the audit supplier is required to provide brief details of the individual's relevant qualifications, skills and experience.

## Appendix 4: Quality assurance and technical capacity

We continually focus on delivering a high quality audit. This means building robust quality control procedures into the core audit process rather than bolting them on at the end, and embedding the right attitude and approaches into management and staff. Quality must build on the foundations of well trained staff and a robust methodology. The diagram summarises our approach and each level is expanded upon below.

We recruit the best staff through our rigorous selection and assessment criteria. In addition, we expect that future talent to develop with our application of most effective in-house and external training support.

Our audit methodology determines that we use a standardised audit approach and pro forma work papers. We also have standards of audit evidence and working papers including requirements for working paper retention.

At critical periods of the audit we conduct both manager and engagement leader review of the work completed. Upon final completion, managers and directors complete a checklist to indicate the satisfactory conclusion of the audit under the audit methodology.

Partners who meet certain skills and experience criteria, conduct quality control reviews of individual audits depending on the level of audit risk. Their role is to perform an objective evaluation of the significant accounting, auditing and financial reporting matters with a high degree of detachment from the audit team. This provides an objective internal assessment on the quality of our audit. Peer review is undertaken across the firm, with an annual sample of our work being undertaken from a different national office. This encourages a constant focus on quality and ensures there is continuous improvement and that best practice is shared.

### Our quality review results

We are able to evidence the quality of our audits through the results of National Audit Office and Audit Commission reviews. The results of the Audit Commission's annual quality review process is made publicly available each year ([www.audit-commission.gov.uk/reports/](http://www.audit-commission.gov.uk/reports/)). The latest report dated October 2010 showed that we performed highly against all the Commission's criteria.

### Resolving Accounting and Financial Report Issues and Emerging Issues with the Independent Regulator

We have a well developed technical infrastructure across the firm that puts us in a strong position to deal with any emerging issues. This includes:

- A national public sector technical director (based in our London office) who has responsibility for co-ordinating our response to emerging accounting issues, influencing accounting bodies (such as CIPFA and the Audit Commission) as well as acting as a sounding board for our auditors.
- A national technical network of public sector audit professionals (that meets on a quarterly basis) and is chaired by our national technical director.
- All of our staff have a searchable data base, Accounting Research Online, that includes all published accounting standards, the KPMG Audit Manual Guidance as well as other relevant sector specific publications, such as the Audit Commission's Code of Audit Practice.
- A dedicated Department of Professional Practice comprised of over 100 staff that provide support to our audit teams and deliver our web-based bi-monthly technical training.

When dealing with the Audit Commission, as you would expect we both attend and cascade across the firm the papers considered by their various technical groups for auditors. In addition, as the Audit Commission has developed we have established a series of formal and informal relationships. These benefit both the Audit Commission and our Local Council clients. As a result of all of these factors, and combined with our overall audit approach, we seek to offer early warnings of issues arising with the independent regulator and provide pragmatic solutions.

