www.pwc.co.uk

# North Warwickshire Borough Council

External Audit Plan 2013/14 - DRAFT

Government and Public Sector

February 2014



## **Contents**

Code of Audit Practice and Statement of Responsibilities of Auditors and of Audited Bodies

*In April 2010 the Audit Commission* issued a revised version of the 'Statement of responsibilities of auditors and of audited bodies'. It is available from the Chief Executive of each audited body. The purpose of the statement is to assist auditors and audited bodies by explaining where the responsibilities of auditors begin and end and what is to be expected of the audited body in certain areas. Our reports and letters are prepared in the context of this Statement. Reports and letters prepared by appointed auditors and addressed to members or officers are prepared for the sole use of the audited body and no responsibility is taken by auditors to any member or officer in their individual capacity or to any third party.

| Executive summary                               | 2  |
|---|----|
| Audit approach                                  | 3  |
| Risk of fraud                                   | 10 |
| Your PwC team                                   | 12 |
| Your audit fees                                 | 13 |
| Appendices                                      | 14 |
| Appendix A: Independence threats and safeguards | 15 |
| Appendix B: Communications Plan                 | 17 |
| Appendix C: Recent developments                 | 18 |
| Appendix D: Audit quality                       | 19 |
| Appendix E: Other engagement information        | 23 |
|   |    |

## **Executive summary**

#### Background

We have prepared this Audit Plan to provide the Executive Board of North Warwickshire Borough Council (the 'Authority') with information about our responsibilities as external auditors and how we plan to discharge them for the audit of the financial year ended 31 March 2014.

#### Framework for our audit

We are appointed as your auditors by the Audit Commission as part of a national framework contract and consequently we are required to incorporate the requirements of the Audit Commission Act 1998 and the Code of Audit Practice 2010 for local government bodies (the 'Audit Code') as well as the requirements of International Standards on Auditing (UK & Ireland) ('ISAs').

The remainder of this document sets out how we will discharge these responsibilities and we welcome any feedback or comments that you may have on our approach.

We look forward to discussing our Audit Plan with you at the Executive Board meeting on Tuesday 11<sup>th</sup> February. Attending the meeting from PwC will be Alison Breadon and Mark Jones.

#### Our responsibilities

Our responsibilities are as follows:

Perform an audit of the accounts in accordance with the Auditing Practice Board's International Standards on Auditing (ISAs (UK&I)).

Report to the National Audit Office on the accuracy of the consolidation pack the Authority is required to prepare for the Whole of Government Accounts.

Form a conclusion on the arrangements the Authority has made for securing economy, efficiency and effectiveness in its use of resources.

Consider the completeness of disclosures in the Authority's Annual Governance Statement, identify any inconsistencies with the other information of which we are aware from our work and consider whether it complies with CIPFA/ SOLACE guidance.

Consider whether, in the public interest, we should make a report on any matter coming to our notice in the course of the audit.

Determine whether any other action should be taken in relation to our other responsibilities under the Audit Commission Act.

Issue a certificate that we have completed the audit in accordance with the requirements of the Audit Commission Act 1998 and the Code of Practice issued by the Audit Commission.

# Audit approach

Our audit engagement begins with an evaluation of the

areas of audit risk.

Our audit is risk based which means that we focus on the areas that matter. We have carried out a risk assessment for 2013/14 prior to considering the impact of controls, as required by auditing standards, which also draws on our understanding of your business.

#### Understanding the Authority's business issues

You are facing significant pressures on central government funding. Welfare reform (such as the benefits cap and universal credit) and changes to the way that local authorities administer income from business rates have tested your resilience to change.

During the 2013/14 year to date you have underspent against budget on pay costs (£266,000), recovered a greater amount in benefits overpayments than forecast (£107,000) and have seen an increase in planning applications and occupancy of your industrial units (£290,000). Overall, you are forecasting a surplus against your original budget (estimate at January 2014 is for a £593,000 underspend).

You have identified the required savings to ensure you achieve plan for 2014/15. You have recognised the need to identify further savings for 2015/16 and beyond and you have implemented actions to identify and review potential cost savings across the Authority's portfolio of services.

There remains uncertainty and risk around your revenues and expenditure over the next 12 months and beyond. We will continue to meet with management to discuss the Authority's response to these risks and future plans.

#### Relevant risks

We determine if risks are significant, elevated or normal and whether we are concerned with fraud, error or judgement as this helps to drive the design of our testing procedures:

| • | Significant | Those risks with the highest potential for material misstatement due to a combination of their size, nature and likelihood and which, in our judgement, require specific audit consideration. |
|---|-------------|---|
| • | Elevated    | Although not considered significant, the nature of the balance/area requires specific consideration.  |

The table below highlights all risks which we consider to be either significant or elevated in relation to our audit for the year ended 31 March 2014.

| Risk  | Categorisation | Audit approach  |
|---|----------------|---|
| Management override of controls<br>ISA (UK&I) 240 requires that we plan our audit<br>work to consider the risk of fraud, which is<br>presumed to be a significant risk in any audit. In | Significant ●  | As part of our assessment of your control<br>environment we will consider those areas where<br>management could use discretion outside of the<br>financial controls in place to misstate the<br>financial statements. |
| every organisation, management may be in a  |                | We will perform procedures to:  |
| position to override the routine day to day<br>financial controls. Accordingly, for all of our<br>audits, we consider this risk and adapt our audit<br>procedures accordingly.          |                | <ul> <li>review the appropriateness of accounting<br/>policies and estimation bases, focusing on any<br/>changes not driven by amendments to reporting<br/>standards;</li> </ul>                                      |
|   |                | <ul> <li>test the appropriateness of journal entries and<br/>other year-end adjustments, targeting higher<br/>risk items such as those that affect the reported<br/>year-end position;</li> </ul>                     |
|   |                | - review accounting estimates for bias and<br>evaluate whether judgment and estimates used<br>are reasonable (for example pension scheme<br>assumptions, valuation and impairment<br>assumptions);                    |
|   |                | - evaluate the business rationale underlying significant transactions outside the normal course of business; and  |
|   |                | - perform unpredictable procedures targeted on fraud risks.   |
|   |                | We may perform other audit procedures if necessary.   |

| Risk  | Categorisation                  | Audit approach   |
|---|---------------------------------|--|
| Risk<br>Risk of fraud in revenue and<br>expenditure recognition<br>Under ISA (UK&I) 240 there is a presumption<br>that there are risks of fraud in revenue<br>recognition.<br>We extend this presumption to the recognition<br>of expenditure in local government because the<br>opportunities to perpetrate fraud, which the ISA<br>considers are usually present in relation to<br>revenue, are more likely to present themselves<br>through manipulation of expenditure in the<br>public sector. | Categorisation<br>Significant • | Audit approach         We will seek to understand and evaluate relevant revenue and expenditure controls and test controls to confirm they are operating effectively.         We will:         - continue our regular dialogue with the statutory officers of the Authority;         - seek to place reliance on internal audit work on key income and expenditure controls;         - evaluate the accounting policies for income and expenditure recognition to ensure that they are consistent with the requirements of the Code of Practice on Local Authority Accounting;         - test the appropriateness of journal entries and other adjustments;         - review accounting estimates for income and |
|   |                                 | <ul> <li>expenditure, for example, provisions;</li> <li>perform cut-off tests at year-end and after date cash testing to ensure items have been recorded in the appropriate period; and</li> <li>perform unrecorded liabilities testing.</li> </ul>  |

| Risk  | Categorisation | Audit approach  |
|---|----------------|---|
| <b>Meeting the financial challenge</b><br>All local government organisations are faced with   | Elevated •     | We will continue to review the savings plans,<br>their robustness and performance against thes<br>plans in year.  |
| <ul> <li>increased challenges in their medium term<br/>financial outlook. There continues to be a number<br/>of risks to the delivery of the plan, particularly in<br/>respect of national changes, such as;</li> <li>the Council Tax Freeze Grant;</li> <li>Welfare Reform Act (the effects of the<br/>benefits cap and the universal credit); and</li> <li>business rates retention.</li> <li>As a result, the following risks are increased:</li> <li>slippage- the Authority may not be able to<br/>achieve the savings planned either from<br/>service reductions or through efficiencies;</li> <li>timing- the timing of planned savings, service<br/>reductions and funding announcements may<br/>impact delivery against the Comprehensive<br/>Spending Review targets; and</li> <li>assumptions- significant policy changes</li> </ul> |                | <ul> <li>plans in year.</li> <li>We will specifically consider : <ul> <li>the impact of new arrangements in relation to the Authority;</li> <li>retention of business rates on the Authority's financial position;</li> <li>the Authority's intentions to take advantag of the Council Tax Freeze Grant;</li> <li>the governance structure in place to deliver the targets;</li> <li>the level and extent of accountability;</li> <li>project management arrangements;</li> <li>monitoring and reporting;</li> <li>progress on delivering the plan; and</li> <li>how the assumptions applied in the Authority's plan compare with other organisations and best practice.</li> </ul> </li> </ul> |
| <ul> <li>assumptions- significant policy changes<br/>might impact on the Authority's ability to<br/>deliver a balanced budget over the period of<br/>the plan.</li> <li>There is also a risk of deteriorating operational<br/>performance and quality due to reduced<br/>resources and management capacity where cost<br/>savings are made without careful consideration.</li> </ul>  |                | assumptions and whether they are realistic and reasonable.  |

## Overall Materiality: £993,400

## Clearly trivial: to be agreed

#### Intelligent scoping Materiality

# £Overall materiality993,400Clearly trivial reporting de minimisto be agreed

We set overall materiality to assist our planning of the overall audit strategy and to assess the impact of any adjustments identified.

Overall materiality is based on your 2012/13 audited accounts and is set at 2% of expenditure. We will update this assessment as necessary in light of the Authority's actual results for 2013/14.

ISA (UK&I) 450 (revised) requires that we record all misstatements identified except those which are "clearly trivial" i.e. those which we do expect not to have a material effect on the financial statements even if accumulated. We would like to seek the Executive Board's views on the possibility of increasing the de minimis reporting threshold from the historic level of £1,000.

## Robust testing

#### Where we do our work

As previously mentioned our audit is risk based which means we focus our work on those areas which, in our judgement, are most likely to lead to a material misstatement. In summary, we will:

- consider the key risks arising from internal developments and external factors such as policy, regulatory or accounting changes;
- consider the robustness of the control environment, including the governance structure, the operating environment, the information systems and processes and the financial reporting procedures in operation;
- understand the control activities operating over key financial cycles which affect the production of the year-end financial statements;
- validate key controls relevant to the audit approach; and
- perform substantive testing on transactions and balances as required.

#### When we do our work

Our audit is designed to quickly consider and evaluate the impact of issues arising to ensure that we deliver a 'no surprises' audit at year-end. This involves early testing at an interim stage and open and timely communication with management to ensure that we meet all statutory reporting deadlines. We engage early, enabling us to debate issues with you. We have summarised our formal communications plan in Appendix B.

## Value for Money work

Our value for money code responsibility requires us to carry out sufficient and relevant work in order to conclude on whether the Authority has put in place proper arrangements to secure economy, efficiency and effectiveness in the use of resources.

North Warwickshire Borough Council

The Audit Commission guidance includes two criteria:

- the organisation has proper arrangements in place for securing financial resilience; and
   the organisation has proper arrangements for
  - the organisation has proper arrangements for challenging how it secures economy, efficiency and effectiveness.

We determine a local programme of audit work based on our audit risk assessment, informed by these criteria and our statutory responsibilities.

## Annual Governance Statement

Local Authorities are required to produce an Annual Governance Statement (AGS), which is consistent with guidance issued by CIPFA/SOLACE: "Delivering Good Governance in Local Government". The AGS is required to be presented by the Authority with the Statement of Accounts.

We will review the AGS to consider whether it complies with the CIPFA/SOLACE "Delivering Good Governance in Local Government" framework and whether it is misleading or inconsistent with other information known to us from our audit work.

### Whole of Government Accounts

We are required to examine the Whole of Government Accounts schedules submitted to the Department for Communities and Local Government and issue an opinion stating in our view if they are consistent or inconsistent with the Statement of Accounts.

#### Meaningful conclusions

We believe fundamentally in the value of the audit and that audits need to be designed to be valuable to our clients to properly fulfil our role as auditors.

In designing the Authority's audit, our primary objective is to form an independent audit opinion on the financial statements; however, we also aim to provide insight.

Audit value comes from the same source as audit quality so the work that we do in support of our audit opinion also means that we should be giving you value through our observations, recommendations and insights. We have set out some recent developments in Appendix C and we will provide other insights and observations to you in our audit reports throughout the year.

We have also developed a Local Government Centre of Excellence which supports your audit team in all aspects of the audit, including sharing insight and observations gained from audit teams across the country.

# Risk of fraud

International Standards on Auditing (UK&I) state that we, as auditors, are responsible for obtaining reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether caused by fraud or error. The respective responsibilities of auditors, management and those charged with governance are summarised below:

| Auditors' responsibility  | Management's responsibility   | Responsibility of the Executive<br>Board  |
|---|---|---|
| <ul> <li>Our responsibilities are:</li> <li>to identify and assess the risks of material misstatement of the financial statements due to fraud;</li> <li>to obtain sufficient appropriate audit evidence regarding the assessed risks of material misstatement due to fraud, through designing and implementing appropriate responses; and</li> <li>to respond appropriately to fraud or suspected fraud identified during</li> </ul> | <ul> <li>Management's responsibilities in relation to fraud are:</li> <li>to design and implement programmes and controls to prevent, deter and detect fraud;</li> <li>to ensure that the entity's culture and environment promote ethical behaviour; and</li> <li>to perform a risk assessment that specifically includes the risk of fraud addressing incentives and pressures, opportunities, and attitudes</li> </ul> | <ul> <li>Your responsibility as part of your governance role is:</li> <li>to evaluate management's identification of fraud risk, implementation of anti-fraud measures and creation of appropriate 'tone at the top'; and</li> <li>to ensure any alleged or suspected instances of fraud brought to your attention are investigated appropriately.</li> </ul> |
| the audit.  | and rationalisation.  |   |

#### Conditions under which fraud may occur



#### Your views on fraud

We enquire of those charged with Governance:

- Whether you have knowledge of fraud, either actual, suspected or alleged, including those involving management?
- What fraud detection or prevention measures (e.g. whistleblower lines) are in place in the entity?
- What role you have in relation to fraud?
- What protocols / procedures have been established between those charged with governance and management to keep you informed of instances of fraud, either actual, suspected or alleged?

## Your PwC team

The individuals in your PwC team have been selected to bring you extensive audit experience from working with local authorities and the wider public sector. We also recognise that continuity in the audit team is important to you and the senior members of our team are committed to developing longer term relationships with you. That having been said we are proposing a change in Engagement Leader for the 2013/14 audit. Alison Breadon was reaching the end of the period for an Engagement Leader before rotation under the Audit Commission's rules, and has decided that now is a good time for a change and a fresh pair of eyes. The proposed change has been discussed and agreed with the Chief Executive and Deputy Chief Executive.

The core members of your audit team for 2013/14 will be:

| Audit Team                           | Responsibilities         |
|--------------------------------------|--------------------------|
| Engagement Leader                    | Engagement Leader        |
| Mark Jones                           | responsible for          |
| 07768 773 490                        | independently            |
|                                      | delivering the audit in  |
| mark.anthony.jones@uk.pwc.com        | line with the Audit Code |
| Mark has worked with the             | (including agreeing the  |
| Authority before. Mark was the       | Audit Plan, ISA 260      |
| Engagement Leader on the audit       | Report to Those          |
| until he had to rotate off the audit | Charged with             |
| under the Audit Commission's         | Governance and the       |
| rules several years ago.             | Annual Audit Letter),    |
|                                      | quality of outputs and   |
|                                      | signing of opinions and  |
|                                      | conclusions.             |

#### Engagement Manager

Team Leader

Liam Gough

07572 384 037

Liam.gough@uk.pwc.com

Tom Gibbs 07850 516 463 Thomas.j.gibbs@uk.pwc.com Manager on the assignment responsible for overall control of the audit engagement, ensuring delivery to timetable, delivery and management of targeted work and overall review of audit outputs. Completion of the Audit Plan, ISA 260 Report and Annual Audit Letter.

Responsible for leading the field team, including the audit of the statement of accounts, and governance aspects of our work. Regular liaison with the finance team. Our audit fees are consistent with those set for the previous year.

## Your audit fees

The Audit Commission has provided indicative scale fees for local authorities for the year ended 31 March 2014. No changes to the work programme have been proposed therefore scale fees for the audit have been set at the same level as the fees applicable for 2012/13.

Our indicative audit fee, as agreed in our audit fee letter, and compared to the actual fee for 2012/13 is as follows:

| Audit fee   | Actual<br>fee<br>2012/13<br>£ | Indicative<br>fee<br>2013/14<br>£ |
|---|-------------------------------|-----------------------------------|
| Audit work performed under the Code of Audit Practice | 55,581                        | 55,581                            |

- Statement of Accounts

- Conclusion on the ability of the organisation to secure proper arrangements for the economy, efficiency and effectiveness in its use of resources

- Whole of Government Accounts

| Certification of Claims and<br>Returns    | 16,350* | 18,500** |
|---|---------|----------|
| Total Audit Code work                     | 71,931  | 74,081   |
| Planned non-audit work                    | -       | -        |
| Total fees (audit and non-<br>audit work) | 71,931  | 74,081   |

We have based the fee level on the following assumptions:

| ٠ | officers meeting the timetable of deliverables, which we |
|---|--|
|   | will agree in writing;                                   |
| • | we are able to use, as planned, the work of internal     |
|   | audit;   |
| • | we do not review more than 3 iterations of the           |
|   | Statement of Accounts;                                   |
| • | we are able to obtain assurance from your management     |
|   | controls;  |
| • | no significant changes being made by the Audit           |
|   | Commission to the local value for money work             |
|   | requirements; and  |
| • | our value for money conclusion and accounts opinion      |
|   | being unqualified.                                       |

If these prove to be unfounded, we will seek a variation order to the agreed fee, to be discussed and agreed in advance with you and the Audit Commission.

\*The actual fees for the 2012/13 certification of claims and returns are in the process of being agreed with the Audit Commission. The figure shown for 2012/13 in the table opposite is the indicative scale fee.

\*\*The indicative composite scale fee for certification of claims and returns in 2013/14 is £18,500. However, as in prior years the certification of claims and returns work will be charged at Audit Commission published hourly rates. We will discuss fees for the certification of claims and returns with you when we have greater certainty on the likely costs for the Authority.

# Appendices

We can provide assurance to the Executive Board that we are independent External Auditors.

# Appendix A: Independence threats and safeguards

At the beginning of our audit process we are required to assess our independence as your external auditor. We have made enquiries of all PwC teams providing services to you and of those responsible in the UK Firm for compliance matters. We have set out below the relationships that, in our professional judgement, may be perceived to impact upon our independence and the objectivity of our audit team, together with the related safeguards.

#### **Other services**

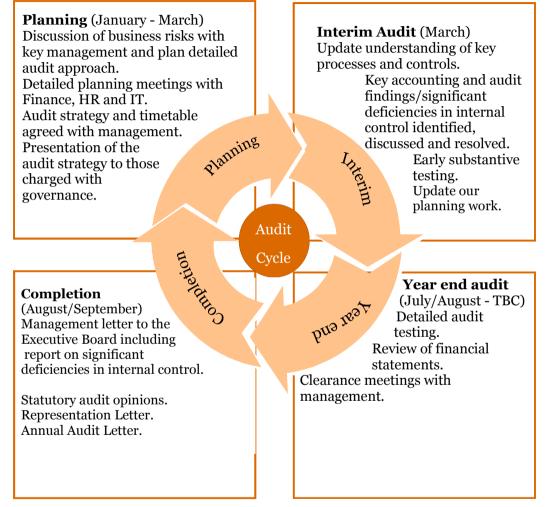
| Support provided by<br>PwC          | Value | Threats to independence and safeguards in place  |
|-------------------------------------|-------|--|
| Certification of claims and returns |       | <b>Self-review threat:</b> The audit team will conduct the grant certification and this has arisen due to our appointment as external auditors.  |
|                                     |       | There is no self-review threat as we are certifying management completed grant returns and claims.   |
|                                     |       | <b>Self-interest threat:</b> As a firm, we have no financial or other interest in the results of the Authority.  |
|                                     |       | We have concluded that this work does not pose a self -interest threat.  |
|                                     |       | <b>Management threat:</b> PwC is not required to take any decisions on behalf of management as part of this work.  |
|                                     |       | <b>Advocacy threat:</b> We will not be acting for, or alongside,<br>management and we have therefore concluded that this work does<br>not pose an advocacy threat.                                 |
|                                     |       | <b>Familiarity threat:</b> Work complements our external audit appointment and does not present a familiarity threat.  |
|                                     |       | <b>Intimidation threat:</b> We have concluded that this work does not pose an intimidation threat as all officers and members have conducted themselves with utmost integrity and professionalism. |

#### Relationships and Investments

Senior officers should not seek or receive personal financial or tax advice from PwC. Non-executives who receive such advice from us (perhaps in connection with employment by a client of the firm) or who also act as director for another audit or advisory client of the firm should notify us, so that we can put appropriate conflict management arrangements in place.

Therefore at the date of this plan we confirm that in our professional judgement, we are independent accountants with respect to the Authority, within the meaning of UK regulatory and professional requirements and that the objectivity of the audit team is not impaired.

# **Appendix B: Communications Plan**



#### **Continuous communication**

- Continuous proactive discussion of issues as and when they arise; 'no surprises';
- continuous evaluation and improvement of the audit; and
- bringing you experience of sector and best practice.

# **Appendix C: Recent developments**

#### The Future of Government



#### **Delivering on the Citizen Promise**

In the face of recurrent budget cuts to reduce fiscal deficits in many countries, affordable government has become the watchword. This means doing more for less – meeting rising citizens' expectations by doing things differently to deliver services more effectively and efficiently.

#### Where Next for public services?

Public sector organisations need to re-evaluate their purpose and role and decide if current visions and missions, and ways of operating to achieve them, are relevant enough to ride the waves of these shifts, or be overwhelmed by them. Government and public sector organisations will also need to respond to these shifts proactively and pre-emptively, to avoid falling one or more steps behind.

#### What guides and shapes the future public body?

As such, tomorrow's public bodies need to navigate themselves by first formulating a strong and clear vision and mission. Together, these will capture the organisation's strategic ambition and purpose and serve to influence decisions and behaviour within the organisation.

#### The Local State We're In



Over the past few years, local government has demonstrated its ability to deliver ambitious and far reaching savings programmes. While council Chief Executives are still holding on to their confidence in meeting savings targets for 2013/14, our third annual local government survey shows that confidence in being able to protect services as well has fallen by 40% over the past year. Beyond 2013/14, confidence in meeting savings targets falls further.

Tough choices are ahead as the cracks begin to show and decisions get closer to the frontline. Councils need to act urgently to transform themselves into agile organisations and shape a role for themselves through a future of continued austerity.

# Appendix D: Audit quality

Quality is built into every aspect of the way that we deliver the Authority's audit. We take great pride in being your auditors and in the value of assurance that the audit opinion provides. A timely, independent and rigorous audit is fundamental. This in turn necessitates getting the basics right – clarity on audit risks, scope, resource, timetables, deliverables and areas of judgement – which is supported by our team that has extensive experience and relevant training.

The table below sets out some of the key ways in which we ensure we deliver a high quality audit.

| Procedure                          | Description  |
|------------------------------------|--|
| People                             | Quality begins with our people. To ensure that every engagement team provides quality, we use carefully designed protocols for recruiting, training, promoting, assigning responsibility and managing and overseeing the work of our people. We invest significant amounts of time and money for the training and development of our audit professionals. Every new team member is carefully selected to ensure they have the right blend of technical expertise and industry experience to support the Authority's audit. |
| Client acceptance<br>and retention | Our client acceptance and retention standards and procedures are designed to identify risks of a client or prospective client to determine whether the risks are manageable.   |
| Audit<br>methodology               | The same audit methodology is used for all local authority audit engagements, thereby ensuring uniformity and consistency in approach. Compliance with this methodology is regularly reviewed and evaluated. Comprehensive policies and procedures governing our accounting and auditing practice – covering professional and regulatory standards as well as implementation issues – are constantly updated for new professional developments and emerging issues, needs and concerns of the practice.                    |
| Technical<br>consultation          | Consultations by engagement teams, typically with senior technical partners unaffiliated with the audit<br>engagement, are required in particular circumstances involving auditing, accounting or reporting<br>matters including matters such as going concern. In addition, we regularly consult with our industry<br>specialists in the Local Government Centre of Excellence and our accounting technical experts that sit on<br>the Audit Commission's Auditors' Group.  |

| Procedure                 | Description   |
|---------------------------|---|
| Technical updates         | PwC prepares numerous publications to keep both PwC staff and our clients abreast of the latest technical guidance.   |
|                           | <ul> <li>These include:</li> <li>a weekly publication covering the week's accounting and business developments;</li> <li>a periodic publication providing in-depth analysis of significant accounting developments; and</li> <li>a publication issued shortly after meetings of standard setters, including the International Financial Reporting Interpretation Committee (IFRIC) and the Emerging Issues Task Force (EITF), to provide timely feedback on issues discussed at the meeting.</li> </ul> |
|                           | We also provide local government specific technical updates through regular publications issued by our Local Government Centre of Excellence and weekly conference calls for all local authority engagement teams during the final audit period. We will share our technical updates with you throughout the year.  |
| Independence<br>standards | PwC has policies and systems designed to comply with relevant independence and client retention standards. Before a piece of non-audit work can begin for the Authority, it must first be authorised by the engagement leader who evaluates the project against our own internal policies and safeguards and against your policy on non-audit services. Above a certain fee threshold, we then seek approval from the Audit Commission before proceeding with any work.                                 |
| Ethics                    | Our Ethics and Business Conduct Programme includes confidential communication channels to voice questions and concerns 24 hours a day, seven days a week. Confidentiality helps us to ensure that we receive the candid information and that we respond with the appropriate technical and risk management resources.   |
| Independent<br>review     | Our audits are subject to ongoing review and evaluation by review teams within PwC and also by the Audit Quality Review Team (AQRT, formerly the Audit Inspection Unit). The most recent report on PwC was issued in May 2013 and although there were some areas for development identified the general theme was that audit quality has continued to improve. The firm has developed action plans for all areas for development identified by the AQRT.  |
|                           | As auditors appointed by the Audit Commission we are also required to comply with its annual Regulatory Compliance and Quality Review programme. The results for our 2012/13 audits are expected in early 2014 and will be publicly available on the Audit Commission's website should you wish to take a look.   |

#### Smart People

We deploy quality people on your audit, supported by a substantial investment in training and in our industry programme. The members of staff deployed on your audit have been taken from our dedicated Government and Public Sector team. These staff members have a wide and deep knowledge of the local government sector.

The engagement manager has been involved in the audit of the Authority for a number of years. This ensures continuity which is beneficial both for our people and your audit through ensuring that accumulated knowledge remains within the audit team, improving the quality of the audit we deliver.

We use dedicated IT specialists on the audit and share their insight and experience of best practices with you.

#### Smart Approach

#### Centre of Excellence

We have a Centre of Excellence in the UK for Local Government which is a dedicated team of specialists which advises, assists and shares best practice with our audit teams in more complex areas of the audit.

Our team has been working side by side with the Centre of Excellence to ensure we are executing the best possible audit approach.

#### Delivery centres

We use dedicated delivery centres to deliver parts of our audit work that are routine and can be done by teams dedicated to specific tasks; for example these include confirmation procedures, preliminary independence checks and consistency and casting checks of the financial statements.

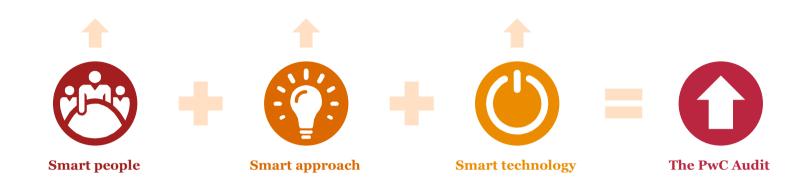
The use of our delivery centres frees up your audit team to focus on other areas of the audit.

We have agreed a process with the Audit Commission, under which data can be off-shored to PwC Service delivery Centres in India and Poland for the facilitation of basic audit tasks, as highlighted earlier. We have also agreed with the Audit Commission how this will be regulated, together with their independent review of our internal processes to ensure compliance, with the Audit Commission requirements for off-shoring. Further information is included in Appendix E.

#### Smart Technology

We have designed processes that automate and simplify audit activity wherever possible. Central to this is PwC's Aura software, which has set the standard for audit technology. It is a powerful tool, enabling us to direct and oversee audit activities.

Aura's risk-based approach and workflow technology results in a higher quality, more effective audit and the tailored testing libraries allow us to build standard work programmes for key Authority audit cycles.



Our 'smart' approach underpins your audit

# Appendix E: Other engagement information

The Audit Commission appointed us as auditors to North Warwickshire Borough Council and the terms of our appointment are governed by:

- the Code of Audit Practice; and
- the Standing Guidance for Auditors.

There are six further matters which are not currently included within the guidance, but which our firm's practice requires that we raise with you.

#### Electronic communication

During the engagement we may from time to time communicate electronically with each other. However, the electronic transmission of information cannot be guaranteed to be secure, virus or error free and such information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete or otherwise be adversely affected or unsafe to use.

PwC partners and staff may also need to access PwC electronic information and resources during the engagement. You agree that there are benefits to each of us in their being able to access the PwC network via your internet connection and that they may do this by connecting their PwC laptop computers to your network. We each understand that there are risks to each of us associated with such access, including in relation to security and the transmission of viruses.

We each recognise that systems and procedures cannot be a guarantee that transmissions, our respective networks and the devices connected to these networks will be unaffected by risks such as those identified in the previous two paragraphs. We each agree to accept the risks of and authorise (a) electronic communications between us and (b) the use of your network and internet connection as set out above. We each agree to use commercially reasonable procedures (i) to check for the then most commonly known viruses before either of us sends information electronically or we connect to your network and (ii) to prevent unauthorised access to each other's systems.

We shall each be responsible for protecting our own systems and interests and you and PwC (in each case including our respective directors, members, partners, employees, agents or servants) shall have no liability to each other on any basis, whether in contract, tort (including negligence) or otherwise, in respect of any error, damage, loss or omission arising from or

in connection with the electronic communication of information between us and our reliance on such information or our use of your network and internet connection.

The exclusion of liability in the previous paragraph shall not apply to the extent that such liability cannot by law be excluded.

#### Appointed auditor

Mark Jones, a director in the firm, will discharge the responsibilities of the appointed auditor and in doing so will bind the firm although Mark is not a partner.

#### Access to audit working papers

We may be required to give access to our audit working papers to the Audit Commission or the National Audit Office for quality assurance purposes.

#### Overseas processing of information

Recently, as with other firms, we have agreed a process with the Audit Commission, under which data can be off-shored to PwC Service Delivery Centres in India and Poland for the facilitation of basic audit tasks. Please refer to the letter at the end of this Appendix for further information on the types of tasks we may off-shore. We confirm that:

- When work is off-shored the firm delivering the audit remains entirely responsible for the conduct of the audit. As such the data will be subject to similar data quality control procedures as if the work had not been off-shored, maintaining the security of your data.
- All firms within the PricewaterhouseCoopers network, including the PwC Service Delivery Centres, have signed an intra-group data protection agreement which includes data protection obligations equivalent to those set out in the EU model contract for the transfer of personal data to data processors outside of the European Economic Area.
- We shall comply at all times with the seventh principle in Part 1 of Schedule 1 to the Data Protection Act 1998.
- Your audit team members will remain your key audit contacts, you will not need to communicate with our overseas delivery teams.
- The audit team members are responsible for reviewing all of the work performed by the overseas delivery teams.
- We already successfully use a UK based delivery centre for financial statements quality checks and that this service will remain in the UK.

If you have any questions regarding this process or if you require further information then please contact Tom Gibbs.

#### Quality arrangements

We want to provide you at all times with a high quality service to meet your needs. If at any time you would like to discuss with us how our service could be improved or if you are dissatisfied with any aspect of our services, please raise the matter immediately with the engagement leader responsible for that aspect of our services to you. If, for any reason, you would prefer to discuss these matters with someone other than that engagement leader, please contact Richard Bacon, our Government & Public Sector Assurance Lead Partner at our office at Cornwall Court, Birmingham, B3 2DT, or James Chalmers, UK Head of Assurance, at our office at 1 Embankment Place, London, WC2N 6NN. In this way we can ensure that your concerns are dealt with carefully and promptly. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. This will not affect your right to complain to the Institute of Chartered Accountants in England and Wales or to the Audit Commission.

#### Events arising between signature of accounts and their publication

ISA (UK&I) 560 places a number of requirements on us in the event of material events arising between the signing of the accounts and their publication. You need to inform us of any such matters that arise so we can fulfil our responsibilities.

If you have any queries on the above, please let us know before approving the Audit Plan or, if arising subsequently, at any point during the year.

North Warwickshire Borough Council, Council Offices, South Street, Atherstone, Warwickshire. CV9 1DE

February 2014

Dear Sue Garner

#### Working more efficiently

As you know the Audit Commission recently tendered the audit work previously delivered by the District Audit service. This realised significant savings which have been passed on to your organisation in a reduction to your scale fee of around 40%.

As a result of this tender, suppliers have sought for opportunities to increase efficiency, whilst maintaining the level of quality. One principle which has recently been established is that certain basic parts of the audit can be off-shored. This is common practice in the private sector. When work is off-shored the firm delivering the audit and thus your audit team, remains entirely responsible for the conduct of the audit. As such the data would be subject to similar data quality control procedures as if the work had not been off-shored, maintaining the security of your data.

Examples of the work that can be off-shored are:

- request for confirmations (Receivables, Bank or Payables);
- verification/vouching of information to source documentation (e.g. agreeing a payable balance to invoice);
- financial statements review;
- mathematical accuracy checks of data;
- research; and
- preparation of lead schedules.

Recently, as with other firms, we have agreed a process with the Audit Commission, under which data can be off-shored to PwC Service delivery Centres in India and Poland for the facilitation of basic audit tasks, as highlighted above. We have agreed with the Audit Commission how this will be regulated, together with their independent review of our internal processes to ensure compliance, with the Audit Commission requirements for off-shoring.

If you have any questions regarding the above, please do not hesitate to get in touch.

Yours sincerely

Mark Jones

Engagement Leader

In the event that, pursuant to a request which North Warwickshire Borough Council has received under the Freedom of Information Act 2000, it is required to disclose any information contained in this report, it will notify PwC promptly and consult with PwC prior to disclosing such report. North Warwickshire Borough Council agrees to pay due regard to any representations which PwC may make in connection with such disclosure and North Warwickshire Borough Council shall apply any relevant exemptions which may exist under the Act to such report. If, following consultation with PwC, North Warwickshire Borough Council discloses this report or any part thereof, it shall ensure that any disclaimer which PwC has included or may subsequently wish to include in the information is reproduced in full in any copies disclosed.

This document has been prepared only for North Warwickshire Borough Council and solely for the purpose and on the terms agreed through our contract with the Audit Commission. We accept no liability (including for negligence) to anyone else in connection with this document, and it may not be provided to anyone else.

© 2014 PricewaterhouseCoopers LLP. All rights reserved. In this document, "PwC" refers to the UK member firm, and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see www.pwc.com/structure for further details.

130610-142627-JA-UK