



Audit Committee

Date: Tuesday, 14 March 2023

Time: 10.00 am

Venue: Council Antechamber, Level 2, Town Hall Extension

Everyone is welcome to attend this committee meeting.

There will be a private meeting for Members only at 9.30am in Committee Room 6 (Room 2006), 2nd Floor of Town Hall Extension. A Town Hall pass is needed to reach this room.

Access to the Council Antechamber

Public access to the Council Antechamber is on Level 2 of the Town Hall Extension, using the lift or stairs in the lobby of the Mount Street entrance to the Extension

There is no public access from the Lloyd Street entrances of the Extension.

Filming and broadcast of the meeting

Meetings of the Audit Committee are 'webcast'. These meetings are filmed and broadcast live on the Internet. If you attend this meeting you should be aware that you might be filmed and included in that transmission.

Membership of the Audit Committee

Councillors -

Lanchbury (Chair), Curley, Good, Russell, Simcock, Stogia and Wheeler

Independent Co-opted Members – Dr S Downs and Dr D Barker

Agenda

1. **Urgent Business**
To consider any items which the Chair has agreed to have submitted as urgent.
2. **Appeals**
To consider any appeals from the public against refusal to allow inspection of background documents and/or the inclusion of items in the confidential part of the agenda.
3. **Interests**
To allow Members an opportunity to [a] declare any personal, prejudicial or disclosable pecuniary interests they might have in any items which appear on this agenda; and [b] record any items from which they are precluded from voting as a result of Council Tax/Council rent arrears; [c] the existence and nature of party whipping arrangements in respect of any item to be considered at this meeting. Members with a personal interest should declare that at the start of the item under consideration. If Members also have a prejudicial or disclosable pecuniary interest they must withdraw from the meeting during the consideration of the item.
4. **Minutes** 5 - 12
To approve as a correct record the minutes of the meeting held on 29 November 2022.
5. **Internal Audit Assurance**
The report of the Head of Audit and Risk Management **will follow**.
6. **Oral Update: Progress of 2020/21 and 2021/22 accounts (Mazars)**
7. **Audit and Risk Management Collaboration**
The report of the head of Audit and Risk **will follow**.
8. **Outstanding Audit Recommendations**
The report of the Head of Audit and Risk Management **will follow**.
9. **Accounting concepts, policies, critical accounting judgements and key sources of estimation uncertainty**
The report of the Deputy Chief Executive and City Treasurer **will follow**.
10. **Audit Strategy Memorandum 2021/22 and External Audit Plan** 13 - 54
The report of the External Auditors (Mazars) is attached.
11. **Work Programme and Decisions Monitor**

The report of the Governance and Scrutiny Support Unit **will follow.**

Information about the Committee

The Committee is responsible for approving the Council's statement of accounts; considering the Audit Commission's Annual Audit and Inspection Letter and monitoring the Council's response to individual issues of concern identified in it. The Committee also considers the Council's annual review of the effectiveness of its systems of internal control and assurance over the Council's corporate governance and risk management arrangements, and engages with the external auditor and external inspection agencies to ensure that there are effective relationships between external and internal audit.

The Council is concerned to ensure that its meetings are as open as possible and confidential business is kept to the strict minimum. When confidential items are involved these are considered at the end of the meeting at which point members of the public are asked to leave.

The Council welcomes the filming, recording, public broadcast and use of social media to report on the Committee's meetings by members of the public.

Agenda, reports and minutes of all Council Committees can be found on the Council's website www.manchester.gov.uk.

Smoking is not allowed in Council buildings.

Joanne Roney OBE
Chief Executive
Level 3, Town Hall Extension,
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Manchester, M60 2LA

Further Information

For help, advice and information about this meeting please contact the Committee Officer:

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Email: donna.barnes@manchester.gov.uk

This agenda was issued on **Monday, 6 March 2023** by the Governance and Scrutiny Support Unit, Manchester City Council, Level 2, Town Hall Extension (Library Walk Elevation), Manchester M60 2LA.

Audit Committee

Minutes of the meeting held on 29 November 2022

Present:

Councillor Lanchbury - In the Chair
Councillors Curley and Simcock
Independent Co-opted member: Dr S Downs
Independent Co-opted member: Dr D Barker

Apologies:

Councillor Russell

Also Present:

Councillor Akbar, Executive Member for Finance and Resources
Councillor Stanton, Deputy Executive Member for Finance and Resources.
Karen Murray, Mazars (External Auditor)
Suresh Patel, Mazars (External Auditor)

AC/22/45 Minutes

The minutes of the previous meeting were submitted for consideration as a correct record.

Karen Murray (Mazars, External Auditors) asked the Committee to agree the following amendments:

AC/22/39 – bullet point 3 be revised to refer to the 2021/22 budget instead of 2022/23.

AC/22/40 – the commencement of Mazars external audit work was again in relation to 2021/22 budget and not 2022/23. Clarification that the agreed timeline for completion had been for the end of January 2023 was also put forward.

Those amendments were accepted.

Decision

To approve the minutes of the meeting held on 18 October 2022 as a correct record, subject to the amendments above.

AC/22/46 External Audit update

The Committee received a report of the External Auditors (Mazars) which provided an update on progress on the completion of external audit work for the financial years 2020/21 and 2021/22. The Committee welcomed Karen Murray (Mazars) who introduced the report and Suresh Patel who members were informed would lead on completion of 2021/22 audit work.

The report provided the current position on:

- 2020/21 Financial Statements Work
- 2021/22 Financial Statements Work
- 2021/22 Value for Money Arrangements work; and
- An overview of national publications relevant to the Local Government audit function, one of which was with specific reference to Local Government Audit Committee function and remit.

With regard the list of national publications, a member referred to statistics on the number of Local Authorities that invest in corporate property outside of area. The Deputy Chief Executive and City Treasurer gave assurance that such investments did not align with the Council's Capital Strategy principles which require that corporate property investments must fall inside the Local Authority area (or in respect of energy investments, its economic area) or must not be made purely for yield.

In respect of recently published Chartered Institute of Public Finance and Accountability (CIPFA) guidance on Audit Committee function and remit (Audit Committee: Practical Guidance For Local Authorities And Police (2022 edition), the Head of Audit and Risk Management confirmed that a short update would be provided at the next meeting with regard to future implications on roles and responsibilities.

The Committee was invited to note that reference in the report to the external audit of 2020/2021 financial year related to Manchester Airport Group accounts and not the Council's 2020/21 accounts.

Decision

To note the report.

AC/22/47 Letters from those charged with Governance

The Committee received a report for information from the Deputy Chief Executive and City Treasurer which presented the main points of assurance issued to the External Auditor from the Audit Committee Chair and the Deputy Chief Executive and City Treasurer, in connection with the audit of the 2021/22 accounts.

A member noted that the responses did not make reference to the topic of potential fraud risk in schools. The Head of Audit and Risk Management explained that scope for potential fraud risk to an extent that it could impact on financial statements work was unlikely to be sufficient to warrant raising with external auditor colleagues as a significantly material concern.

Having duly considered the responses provided on financial accounting arrangements, the risks of fraud and compliance with laws and regulations, the Committee noted the report.

Decision

To note the report.

AC/22/48 Treasury Management Interim Update

The Committee considered a report of the Deputy Chief Executive and City Treasurer which set out treasury management activities of the Council during the first six months of 2022/23.

The report provided information on:

- The Council's portfolio position as at 30th September 2022
- A review of economic conditions 2022-23 to date
- An overview of Treasury borrowing in 2022-23 to date, with specific reference to Public Works Loan Board (PWLB), temporary borrowing and Salix borrowing
- Compliance with Prudential Indicators and Treasury Limits
- Investment Strategy for 2022-23 to date
- Temporary Borrowing and Investment for 2022-23 to date
- Implications of Rising Interest Rates; and
- Concluding comments

The Commercial Finance Lead responded to questions from members about the temporary borrowing portfolio, lender option borrower option (LOBO) loans, the implications of rising interest rates including international considerations, the nuances of local government cashflow and compliance with treasury limits.

The Executive Member for Finance and Resources thanked officers for the comprehensive report with particular reference to their important role in minimising borrowing costs and maximising the Council's investment returns in the context of financial volatility and uncertainty.

The Committee noted report.

Decision

To note the report.

AC/22/49 Risk Review: Governance and Management of Complaints

The Committee received a report of the Assistant Chief Executive and the City Solicitor which presented the complaints, enquiries and information request dashboard. The dashboard set out the Council's annual performance for 2021/22 in the management of corporate and social care complaints, Councillor and MP enquiries, as well as information requests.

Key themes of the report were:

- An overview of the complaints and enquiries dashboard
- Corporate Complaints: 77% of Stage one complaints. responded to within ten working days, 16% of complaints escalated to Stage two., 60%of stage two

complaints responded to within ten working days, 28% of Stage one and two complaints upheld.

- Councillor and MP enquiries: 76% of enquiries responded to within ten working days
- Social Care Complaints: 59% of social care complaints handled within timescale, 27% of social care decisions upheld
- Local Government and Social Care Ombudsman (LGSCO) Enquiries: There had been an increase in the number of Local Government and Social Care Ombudsman enquiries, and performance had improved in that the average number of days taken to respond had fallen to 16 in comparison with the previous year's 21, 24% of Local Government and Social Care Ombudsman decisions were upheld
- Praise: there had been an increase in the number of instances of praise (409) in comparison with the previous year (383)
- Learning from complaints: including Critical Learning and Learning Action Plans
- Freedom of Information and GDPR requests: 84% of GDPR requests responded to within relevant statutory timescale, 79% of Freedom of Information Act requests responded to within relevant statutory timescale

The Committee welcomed the comprehensive report and noted the increase in instances of praises for Council Services. A discussion followed on the comparative increase in complaints with regard to the previous year's data. The impact of changed expectations about service delivery in the post-pandemic environment, including a greater reliance on remote-working and an associated trend towards uptake of digital channels for residents, businesses and service users were cited amongst possible influencing factors.

A member commented on the significant increase in complaints to Children's Services and Education which had arisen following the implementation of a new system being used for school place admissions. The Deputy Chief Executive and City Treasurer spoke about the value in learning from complaints and emphasised the significance of the tone of engagement taken with the city's residents and the shift to a listening culture.

Following a question about the number of logged Councillor enquiries referenced in the report and how that compared with the number of councillor-led requests for service / information, the Assistant Chief Executive agreed to undertake a piece of work with services to improve how Councillor enquiries are recorded and monitored, including the development of refreshed guidance.

The Deputy Executive Member for Finance and Resources spoke about plans to broaden digital access to Council services to ensure inclusivity of all of the city's residents, businesses and other users of Council services and the impact of an increased awareness about legislative rights under for example, the General Data Protection Regulation and Freedom of Information Acts.

In terms of closing comments, the Executive Member for Finance and Resources acknowledged the importance of a robust, positive and responsive complaints system which supports the organisation in identifying weaknesses in its systems or

policies in seeking to address them. He indicated that the overall increase was attributable to a shift towards increased remote-working practices which, in the context of a natural tendency to notice when things go wrong as opposed to when they work well and an ongoing commitment to widen digital access, should be encouraged and embraced as opportunities for continuous and ongoing improvement.

Decision

1. To note the update.
2. To note that the Assistant Chief Executive will undertake a piece of work with services to improve how Councillor enquiries are recorded and monitored, including the development of refreshed guidance.

AC/22/50 Code of Corporate Governance

The Committee considered a report of the Deputy Chief Executive and City Treasurer which presented the revised draft of the Council's Code of Corporate Governance (the Code). The Code had been updated to align with published guidance and was attached as an appendix with a proposal that the Code should instead be a stand-alone document, instead of an aspect of the Council's Constitution to create greater flexibility in terms of timings of updates

The Committee was invited to note that revised draft had been considered at a recent meeting of the Council's Standards Committee, which made no amendments.

The Committee was invited to consider the Code and to recommend to the Council that responsibility for approval of the Code of Corporate Governance is delegated to the Audit Committee, with Standards Committee members invited to comment. Next steps were described as an assessment of the Council's compliance with the Code to be completed within the Annual Governance Statement to be considered by both committees in the summer of 2023.

The Committee agreed the recommendations.

Decision

1. To note the report
2. To recommend to the Council that responsibility for approval of the Code of Corporate Governance is delegated to the Audit Committee and in doing so that Council:
 - Agrees changes to the delegations to the Audit Committee set out in the Council's Constitution so that approval of the Code of Corporate Governance is the responsibility of Audit Committee.
 - Agrees to delete the reference to the Code of Corporate Governance from the Council's Policy Framework at Article 4 of the Council's Constitution; and
 - Removes Section G of Part 6 ("Manchester City Council - Code of Corporate

Governance") from the Council's Constitution.

AC/22/51 Risk Management Strategy and Corporate Risk Register

The Committee considered a report of the Deputy Chief Executive and City Treasurer which discussed the Council's corporate governance and risk management arrangements, the control environment and associated anti-fraud and anti-corruption arrangements. It included a copy of the latest refresh of the Corporate Risk Register and an overview of the approach being taken to respond to inflationary finance risks, at the committee's earlier request.

The Committee was invited to consider the assurance provided in the report, which made specific reference to:

- The context of recent updates to the Corporate Risk Register, influenced by a fundamental rewrite of the risks and the description of response actions which itself had arisen due to a re-evaluation of the degree those risks interact.
- A summary of risks agreed at the Senior Management meeting held in September 2022 (the Corporate Risk Register (CRR) was appended to the report)
- A discussion about Inflationary risk

In response to a question about climate change targets, the Deputy Chief Executive and City Treasurer explained the reasons behind the risk being split and the Council's approach to deliver high return / low risk interventions as part of the agreed Action Plan. With regard to actions to meet cross city targets, she referred to the Climate Change Partnership Framework which sets out the scale of action required and those that sit within the agency of the Council or local partners. She added that the Council would continue to seek solutions use its influence in terms of lobbying and pressure regarding policy change requirements that sit within the agency of central government.

There was a discussion about risk management of a further global pandemic. The Head of Audit and Risk Management referred to the involvement of the Local Resilience Forum as well as a Greater Manchester and city-wide response to business continuity, with appropriate planning around response. However those risks would be cross-referenced.

A member noted the risk referred to in relation to scale and type of housing in the city and requested further information and assurance on how those risks are being managed. The Deputy Chief Executive and City Treasurer referred to pressures on the availability of temporary accommodation in the city some of which directly affected the Council's ability to develop services associated with homelessness. She however asked the Committee to note that aspects of provision did not sit wholly with the Council which added to a degree of complexity around the matter.

With regard to the Cost of Living Crisis, the Chair commented that implications associated with Risks 6 and 7 in the report are given appropriate focus assessed in preparation for the next review of the Register. The Deputy Chief Executive advised that the review would reflect the impact on service delivery implications as well as the

impacts residents (a number of whom were employees) and mitigations associated with the Anti Poverty Workforce Strategies that would be in place.

The Chair thanked officers for the helpful and informative report and requested that should risks in relation to the implications of the Cost of Living Crisis significantly increase, a further update to the Audit Committee should be brought for members' views.

Decision

To note the report and in doing so, request that should risks in relation to the implications of the Cost of Living Crisis significantly increase, a further update shall be brought to the Committee.

AC/22/52 Register of Significant Partnerships

The Committee considered a report of the Deputy Chief Executive and City Treasurer which provided a six-monthly update on the partnerships issued a 'reasonable' or 'limited' rating in terms of governance arrangements. A copy of the Register in full was appended to the report.

An overview of further steps that had been agreed to strengthen and enhance governance practices was also included. These incorporated amendments to the way relevant information was captured, the timeline for the production of the register as well as proposals to build a lessons learnt exercise into the annual process to aid continuous improvement.

The Committee was invited to note that a further six entities had been identified for inclusion on the Register. The next annual update to Committee is scheduled for June 2023.

In response to a comment about recent events under the remit of the Greater Manchester Mental Health Trust (GMMHT), the Head of Programme Management Office: Commercial Governance advised that the partnership's performance would be reviewed as part of the next cycle. The Deputy Chief Executive and City Treasurer gave assurance that the Council was working closely with GMMHT and that an update outlining that assurance would be reflected in the next update.

The Committee was also invited to note the Acting Chief Executive of One Education's term of office had been further extended whilst further arrangements were being implemented to improve governance and strategy were being developed and formalised.

In response to a question from the chair about board vacancies for Manchester Working Limited, the Head of Programme Management Office: Commercial Governance advised that those vacancies were a package of directorships under review given the impending departure of the Director of Commercial Operations from the Neighbourhoods Directorate.

Decision

To note the report.

AC/22/53 Work Programme and Recommendations Monitor

The Committee considered a report of the Governance and Scrutiny Support Unit which set out its future Work Programme for the forthcoming municipal year.

Members discussed proposals for the Annual Training Event and noted the information provided in Sections 2 in respect of recent comments in relation to the Christie Car Parking Scheme.

Decision

To agree the Committee's Work programme as set out in the report.

Audit Strategy Memorandum

Manchester City Council

Year ending 31 March 2022

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08	Our commitment to independence
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Appendix – Key communication points

This document is to be regarded as confidential to Manchester City Council. It has been prepared for the sole use of the Audit Committee as the appropriate committee charged with governance. No responsibility is accepted to any other person in respect of the whole or part of its contents. Our written consent must first be obtained before this document, or any part of it, is disclosed to a third party.



Members of the Audit Committee
Manchester City Council
Manchester Town Hall
Manchester
M60 2LA

Mazars LLP
One St Peter's Square
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M2 3DE

8 November 2022

Dear Audit Committee Members

Audit Strategy Memorandum – Year ending 31 March 2022

We are pleased to present our Audit Strategy Memorandum for Manchester City Council for the year ending 31 March 2022. The purpose of this document is to summarise our audit approach, highlight significant audit risks and areas of key judgements and provide you with the details of our audit team. As it is a fundamental requirement that an auditor is, and is seen to be, independent of its clients, section 8 of this document also summarises our considerations and conclusions on our independence as auditors. We consider two-way communication with you to be key to a successful audit and important in:

- reaching a mutual understanding of the scope of the audit and the responsibilities of each of us;
- sharing information to assist each of us to fulfil our respective responsibilities;
- providing you with constructive observations arising from the audit process; and
- ensuring that we, as external auditors, gain an understanding of your attitude and views in respect of the internal and external operational, financial, compliance and other risks facing Manchester City Council which may affect the audit, including the likelihood of those risks materialising and how they are monitored and managed.

With that in mind, we see this document, which has been prepared following our initial planning discussions with management, as being the basis for a discussion around our audit approach, any questions, concerns or input you may have on our approach or role as auditor. This document also contains an appendix that outlines our key communications with you during the course of the audit.

For 2021/22 we have made a change to your engagement lead with Suresh Patel replacing Karen Murray.

Client service is extremely important to us and we strive to provide technical excellence with the highest level of service quality, together with continuous improvement to exceed your expectations so, if you have any concerns or comments about this document or audit approach, please contact me on 07977 261873.

Yours faithfully

Suresh Patel, Partner, Mazars LLP

01

Section 01:

Engagement and responsibilities summary

1. Engagement and responsibilities summary

Overview of engagement

We are appointed to perform the external audit of Manchester City Council (the Council) for the year to 31 March 2022. The scope of our engagement is set out in the Statement of Responsibilities of Auditors and Audited Bodies, issued by Public Sector Audit Appointments Ltd (PSAA) available from the PSAA website: <https://www.psaa.co.uk/managing-audit-quality/statement-of-responsibilities-of-auditors-and-audited-bodies/>. Our responsibilities are principally derived from the Local Audit and Accountability Act 2014 (the 2014 Act) and the Code of Audit Practice issued by the National Audit Office (NAO), as outlined below.

Audit opinion

We are responsible for forming and expressing an opinion on the financial statements. Our audit does not relieve management or the Audit Committee, as those charged with governance, of their responsibilities.

The Deputy Chief Executive and City Treasurer is responsible for the assessment of whether it is appropriate for the Council to prepare its accounts on a going concern basis. As auditors, we are required to obtain sufficient appropriate audit evidence regarding, and conclude on: a) whether a material uncertainty related to going concern exists; and b) consider the appropriateness of the Deputy Chief Executive and City Treasurer's use of the going concern basis of accounting in the preparation of the financial statements.

Value for money

We are also responsible for forming a commentary on the arrangements that the Council has in place to secure economy, efficiency and effectiveness in its use of resources. We discuss our approach to Value for Money work further in section 6 of this report.

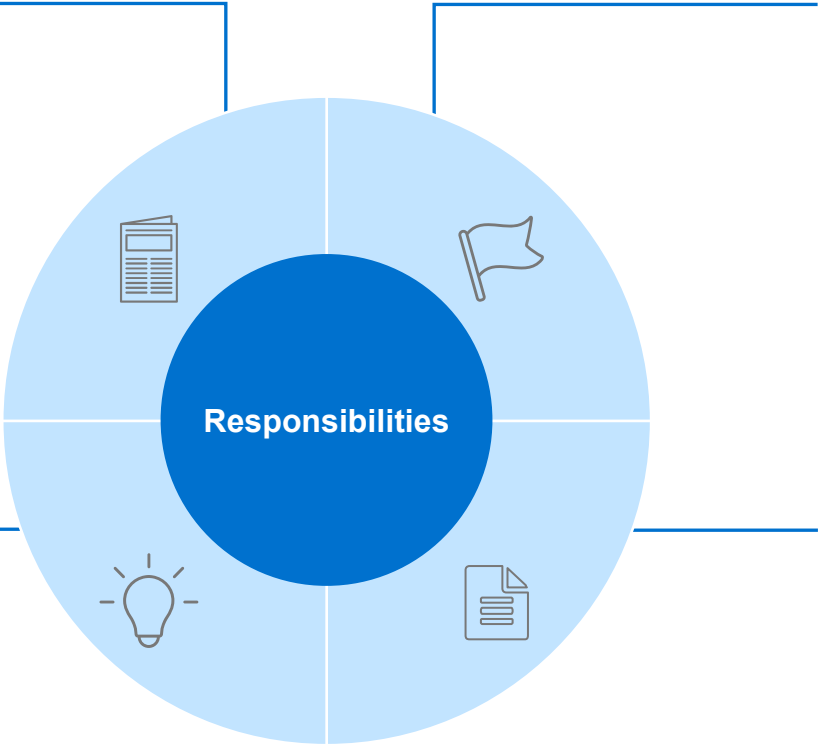
Fraud

The responsibility for safeguarding assets and for the prevention and detection of fraud, error and non-compliance with law or regulations rests with both those charged with governance and management. This includes establishing and maintaining internal controls over reliability of financial reporting.

As part of our audit procedures in relation to fraud we are required to enquire of those charged with governance, including key management as to their knowledge of instances of fraud, the risk of fraud and their views on internal controls that mitigate the fraud risks. In accordance with International Standards on Auditing (UK), we plan and perform our audit so as to obtain reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether caused by fraud or error. However our audit should not be relied upon to identify all such misstatements.

Wider reporting and electors' rights

We report to the NAO on the consistency of the Council's financial statements with its Whole of Government Accounts (WGA) submission. The 2014 Act requires us to give an elector, or any representative of the elector, the opportunity to question us about the accounting records of the Council and consider any objection made to the accounts. We also have a broad range of reporting responsibilities and powers that are unique to the audit of local authorities in the United Kingdom.



Engagement and responsibilities summary	Your audit engagement team	Audit scope, approach and timeline	Extended auditor's report	Significant risks and key judgement areas	Value for money	Fees for audit and other services	Our commitment to independence	Materiality and misstatements	Appendices
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02

Section 02:

Your audit engagement team

2. Your audit engagement team

Pages

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Suresh Patel

Engagement Partner

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Simon Livesey

Engagement Assistant Manager

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We have made a change to your Engagement Partner with Suresh Patel replacing Karen Murray. Suresh joined the firm in August 2021 and has 29 years of experience auditing large councils, following 18 years with the Audit Commission, 4 years with Mazars in 2012-2016 and 5 years as an Associate Partner with EY.

We provide continuity in the team with Alastair remaining as your Engagement Senior Manager along with Simon as the Assistant Manager.

In addition, the Council meets the criteria of a Major Local Audit under the Local Audit and Accountability Act 2014. As a result, as part of the firm's quality management arrangements we appoint an engagement quality control reviewer (EQCR) who works closely with Suresh and the team but has no direct engagement with the Council.

Engagement and responsibilities summary

Your audit engagement team

Audit scope, approach and timeline

Extended auditor's report

Significant risks and key judgement areas

Value for money

Fees for audit and other services

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mazars

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03

Section 03:

Audit scope, approach and timeline

3. Audit scope, approach and timeline

Audit scope

Our audit scope is designed to provide an audit that complies with all professional requirements.

Our audit of the financial statements will be conducted in accordance with International Standards on Auditing (UK), relevant ethical and professional standards, our own audit approach and in accordance with the terms of our engagement. Our work is focused on those aspects of your activities which we consider to have a higher risk of material misstatement, such as those impacted by management judgement and estimation, application of new accounting standards, changes of accounting policy, changes to operations or areas which have been found to contain material errors in the past.

Audit approach

Our audit approach is risk-based and primarily driven by the issues we consider lead to a higher risk of material misstatement of the accounts. Once we have completed our risk assessment, we develop our audit strategy and design audit procedures in response to this assessment.

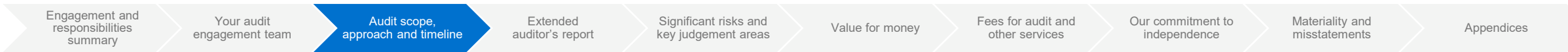
If we conclude that appropriately-designed controls are in place then we may plan to test and rely upon these controls. If we decide controls are not appropriately designed, or we decide it would be more efficient to do so, we may take a wholly substantive approach to our audit testing. Substantive procedures are audit procedures designed to detect material misstatements at the assertion level and comprise: tests of details (of classes of transactions, account balances, and disclosures); and substantive analytical procedures. Irrespective of the assessed risks of material misstatement, which take into account our evaluation of the operating effectiveness of controls, we are required to design and perform substantive procedures for each material class of transactions, account balance, and disclosure.

Our audit will be planned and performed so as to provide reasonable assurance that the financial statements are free from material misstatement and give a true and fair view. The concept of materiality and how we define a misstatement is explained in more detail in section 9.

Our 2021/22 audit has been planned with the knowledge and experience from the 2020/21 audit. Our draft Audit Completion Report for 2020/21 reported adjustments and control weaknesses which reflected the challenges the Council faced in closing down the 2020/21 accounts. We have not identified any specific risks relating to the closedown processes for 2021/22 because the Council has reportedly put in place stronger quality assurance processes around the key difficulty areas from the prior year. We will assess the effectiveness of these stronger processes through our 2021/22 audit.

The 2020/21 audit is not yet complete and the planning for this 2021/22 audit has been completed in that context. The main area outstanding in the 2020/21 audit relates to the accounting for the Council's infrastructure assets. This is a national issue, for which CIPFA and the responsible government department are engaged in providing a practical resolution. This issue will also impact on the 2021/22 financial statements. We have not identified this infrastructure assets issue as an audit risk, because the impact on the Council and the audit is not yet clear. Once the proposed solution to the issue has been agreed nationally, and the Council has, if necessary, revised its accounting for its infrastructure assets, our audit approach will incorporate testing the accounting treatment. Our timetable for completing the 2021/22 audit is dependent on resolving this issue, and as a result our timetable on the following page is provisional.

The diagram on the next page outlines the procedures we perform at the different stages of the audit.



3. Audit scope, approach and timeline

Under the Accounts and Audit Regulations the Council is required to publish its draft statement of accounts for 2021/22 by the end of July and publish audited statements by the end of September. However, the Department of Levelling Up, Housing and Communities have proposed that the target date for publishing audited statements be moved to the end of November 2022. Given the fact that the 2020/21 audit is yet to be completed, we have agreed with the Council a timetable for the 2021/22 audit that is realistic and achievable. The timetable is subject to a number of assumptions and we will update the Committee on any significant changes that we agree with the Council.

Planning (October 2022)

- Planning visit and developing our understanding of the Council
- Initial opinion and value for money risk assessments
- Considering proposed accounting treatments and accounting policies
- Developing the audit strategy and planning the audit work to be performed
- Agreeing timetable and deadlines
- Preliminary analytical review

Completion (TBC - early 2023)

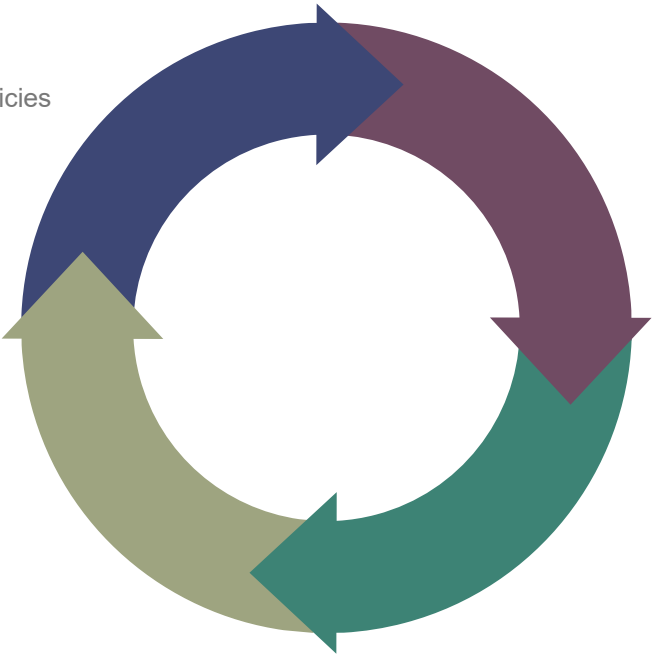
- Final review and disclosure checklist of financial statements
- Final internal coaching reviews and Partner and EQCR review
- Agreeing content of letter of representation
- Internal review and clearance of the Audit Report
- Reporting to the Audit Committee
- Reviewing subsequent events
- Signing the auditor's report

Interim (October 2022)

- Documenting systems and controls
- Performing walkthroughs
- Early substantive testing of transactions
- Reassessment of audit plan and revision if necessary

Fieldwork (October 2022 – January 2023)

- Receiving and reviewing draft financial statements
- Reassessing the audit plan and revising if necessary
- Executing the strategy starting with significant risks and high risk areas
- Communicating progress and issues
- Clearance meeting



3. Audit scope, approach and timeline

Management's and our experts

Management makes use of experts in specific areas when preparing the Council's financial statements. We also use experts to assist us to obtain sufficient appropriate audit evidence on specific items of account.

Item of account	Management's expert	Our expert
Defined benefit pension assets and liabilities	Hyman Robertson	PwC – NAO's consulting actuary
Non-Council Dwelling Property, Plant and Equipment and Investment Property valuation	Jacobs	Mazars in house valuation team
Council dwellings valuation	Capita	N/A – local audit team
Surplus Assets valuation	Council valuation experts	Mazars in house valuation team
Valuation of MAHL and DML land & buildings for Group consolidation purposes	Avison Young	Mazars in house valuation team
Valuation of Financial Instruments	Link Asset Services	We will review Link's methodology for providing the fair value disclosures

Service organisations

There are no service organisations used by the Council which impact upon our planned audit approach.

Reliance on internal audit

Although we do not plan to place any reliance on the work of internal audit, where possible we will seek to understand their work to ensure the nature, extent and timing of our audit procedures is appropriate. We will meet with internal audit to discuss the progress and findings of their work prior to the commencement of our controls evaluation procedures.

3. Audit scope, approach and timeline

Group audit approach

The Council's group structure for 2021/22 will consolidate the Council's share of two other organisations: Manchester Airport Holdings Limited (MAHL) and Destination Manchester Limited (DML). In auditing the accounts of the Council's Group financial statements we need to obtain assurance over the transactions in the Group relating to the Council's share of these two entities. The Council owns 50% of the voting shares in MAHL and classes its investment as a joint venture, accounting for its share of the equity in MAHL. The Council wholly owns DML and consolidates its share of the company on a line-by-line basis.

Our group audit approach reflects the size and complexity of the transactions from the two companies that are consolidated into the Council's Group financial statements. Based on our planning discussions and review of previous year's accounts, we consider that MAHL is a financially significant component and that our significant risk relating to the Pension Liability, as set out in section 5, is a risk that applies to MAHL as well as the Council. Based on our knowledge and discussions we consider that there is a significant risk within DML relating to the revaluation of DML's land & buildings required for consolidation.

Our planned approach, based on our initial understanding of 2021/22 and the values reported in the draft financial statements, is to obtain assurance on the audit of MAHL from their external auditor, KPMG LLP ("the component auditor"). We issue group audit instructions to the component auditor and liaise closely with them through their external audit. After the conclusion of their audit of MAHL we review their audit files to obtain assurance on the accounting entries of which the Council consolidates its share. For the revaluation of the land and buildings in both MAHL and DML we will engage our in-house valuation team to review the methodology and assumptions adopted by the Council's valuers (Avison Young). For all other entries within DML we intend to carry out group level analytical procedures. The table below summarises our planned group audit approach.

If there are any changes to our assessment of the significance of the Council's group components, either through the size and complexity or the significant risks at the components, we will communicate these changes to the Audit Committee.

Entity	Significant by size	Significant risk	Planned audit scope	Auditor
Manchester City Council	Yes	Yes	Full audit carried out by group engagement team	Mazars - group engagement team
Manchester Airport Holdings Ltd	Yes	Yes	Full audit carried out by component auditor	KPMG LLP
Destination Manchester Ltd	No	Yes	Specified audit procedures on the revaluation of the component's land & buildings Group level analytical procedures	Mazars - group engagement team



04

Section 04: **Extended auditor's report**

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4. Extended auditor’s report

Layout of extended auditor’s report and implications for the audit

The extended auditor’s report for the Council is expected to follow the format and structure below for the year ending 31 March 2022 assuming that no emphasis of matter or qualification is required.

Paragraph heading in order	Summary of key content
Opinion on the financial statements	What we have audited and our opinion thereon.
Basis for opinion	Confirms that the audit is undertaken under the ISAs (UK). Specific confirmation of our independence including with the FRC’s Ethical Standard. Specific confirmation re sufficiency and appropriateness of audit evidence obtained to provide a basis for our opinion.
Conclusions relating to going concern	Reporting by exception on the Council’s: <ul style="list-style-type: none">• use of the going concern basis of accounting• disclosure of any material uncertainties
Key audit matters	Includes definition of key audit matters. Clarifies that these matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and that we do not provide a separate opinion on these matters. For each key audit matter identified: <ul style="list-style-type: none">• A description of the most significant assessed risk(s) of material misstatement;• A summary of our response to those risks including significant judgements applied; and• Where relevant, key observations arising with respect to those risks including clear reference to relevant disclosures in the financial statements.



4. Extended auditor’s report

Paragraph heading in order	Summary of key content
Our application of materiality and an overview of the scope of our audit	Explanation of how we applied the concept of materiality in planning and performing the Group and Council audit. The overall materiality threshold for the Group and Council financial statements as a whole, performance materiality and triviality. Overview of the scope of the Group and Council audit, including an explanation of how the scope addressed each key audit matter and was influenced by our application of materiality.
Other information	Responsibilities of the Deputy Chief Executive and City Treasurer and of the auditor for Other information included in the financial statements.
Responsibilities of the Deputy Chief Executive and City Treasurer	Cross reference to the full Statement of the Deputy Chief Executive and City Treasurer’s Responsibilities.
Auditor’s responsibilities for the audit of the financial statements	Explanation of the ‘reasonable assurance’ objective of the audit. Cross-reference to our responsibilities for the audit on the FRC’s web-site. Explain to what extent the audit was considered capable of detecting irregularities, including fraud.
Value for money arrangements	Report on the Council’s arrangements for securing economy, efficiency and effectiveness in its use of resources.
Matters on which we are required to report by exception	Report in the public interest under section 24 of the Local Audit and Accountability Act 2014. Recommendation under section 24 of the Local Audit and Accountability Act 2014. Exercise of any other special powers of the auditor under the Local Audit and Accountability Act 2014.

4. Extended auditor's report

Paragraph heading in order	Summary of key content
Other matters which we are required to address	Confirms that we have not carried out any prohibited non-audit services and that we remain independent on the Council and its Group. Confirms that our audit opinion is consistent with the Audit Completion Report.
Use of the audit report	Who we are reporting to and what the report may be used for.
Audit certificate	Sets out that we have completed the audit of the Council in accordance with the Local Audit and Accountability Act 2014.

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05

Section 05:

**Significant risks, key audit matters
and other key judgement areas**

5. Significant risks, key audit matters and other key judgement areas

Following the risk assessment approach discussed in section 3 of this document, we have identified risks relevant to the audit of financial statements. The risks that we identify are categorised as significant, enhanced or standard. The definitions of the level of risk rating are given below:

Significant risk

A significant risk is an identified and assessed risk of material misstatement that, in the auditor's judgment, requires special audit consideration. For any significant risk, the auditor shall obtain an understanding of the entity's controls, including control activities relevant to that risk.

Enhanced risk

An enhanced risk is an area of higher assessed risk of material misstatement at audit assertion level other than a significant risk. Enhanced risks require additional consideration but does not rise to the level of a significant risk, these include but may not be limited to:

- key areas of management judgement, including accounting estimates which are material but are not considered to give rise to a significant risk of material misstatement; and
- other audit assertion risks arising from significant events or transactions that occurred during the period.

Standard risk

This is related to relatively routine, non-complex transactions that tend to be subject to systematic processing and require little management judgement. Although it is considered that there is a risk of material misstatement (RMM), there are no elevated or special factors related to the nature, the likely magnitude of the potential misstatements or the likelihood of the risk occurring.

Key audit matters

Key audit matters are defined as those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period and include the most significant assessed risks of material misstatement (whether or not due to fraud) we identified, including those which had the greatest effect on: the overall audit strategy, the allocation of resources in the audit; and directing the efforts of the engagement team.

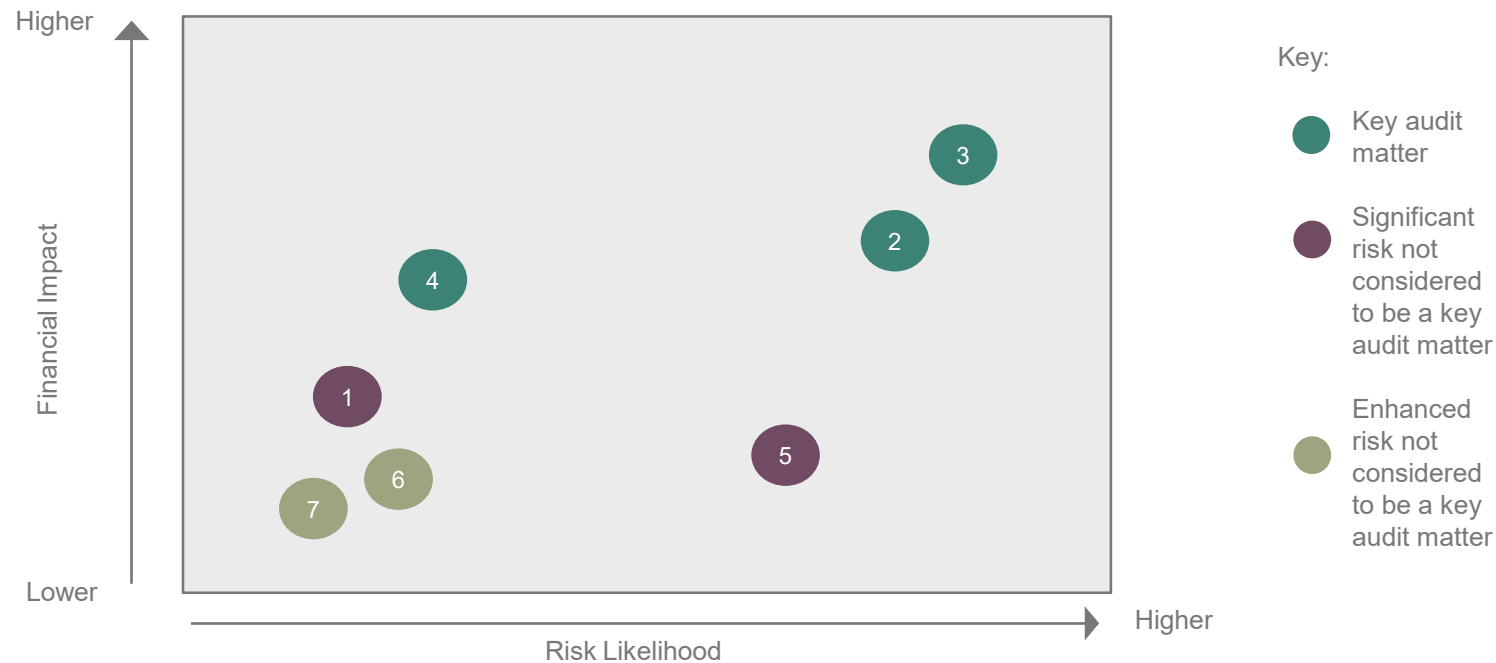
It is important that you understand and have the opportunity to discuss with us why something is being communicated as a key audit matter and the way this is described. This section highlights which of the significant risks and other key judgement areas are considered by us at the planning stage to be key audit matters. It should be noted, however, that other key audit areas may be identified during the course of the audit.



5. Significant risks, key audit matters and other key judgement areas

Summary risk assessment

The summary risk assessment, illustrated in the table below, highlights those risks which we deem to be significant and other enhanced risks in respect of the Council. We have summarised our audit response to these risks on the next page.



1. Management override of controls

2. Valuation of the Council and Group property, plant and equipment

3. Valuation of the Council Investment Property
4. Valuation of the Council net defined benefit pension liability

5. Consolidation of Group Financial Statements

6. Accounting for Northwards Housing
7. Accounting for cash and cash equivalents

5. Significant risks, key audit matters and other key judgement areas

Specific identified audit risks and planned testing strategy

We have presented below in more detail the reasons for the risk assessment highlighted above, and also our testing approach with respect to significant risks. An audit is a dynamic process, should we change our view of risk or approach to address the identified risks during the course of our audit, we will report this to the Audit Committee.

Significant risks

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
1	<p>Management override of controls This is a mandatory significant risk on all audits due to the unpredictable way in which such override could occur.</p> <p>Management at various levels within an organisation are in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. Due to the unpredictable way in which such override could occur there is a risk of material misstatement due to fraud on all audits.</p>	●	○	○	○	We plan to address the management override of controls risk through performing audit work over accounting estimates, journal entries and significant transactions outside the normal course of business or otherwise unusual.

5. Significant risks, key audit matters and other key judgement areas

Significant risks (continued)

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
2	<p>Valuation of Property, Plant & Equipment (Council & Group)</p> <p>The CIPFA Code requires that where assets are subject to revaluation, their year-end carrying value should reflect the current value at that date. The Council has adopted a rolling revaluation model which sees all such property, plant & equipment revalued in a five-year cycle.</p> <p>The valuation of property, plant & equipment involves the use of a management expert (the valuer) and incorporates assumptions and estimates which impact materially on the reported value. There are risks relating to the valuation process.</p> <p>The Council employs a valuation expert to provide valuations, however there remains a high degree of estimation uncertainty associated with the valuations of property, plant and equipment due to the significant judgements and number of variables involved.</p> <p>As a result of the rolling programme of revaluations, there is a risk that individual assets which have not been revalued for up to four years are not valued at the current value at the balance sheet date. In addition, as the valuations are undertaken through the year there is a risk that the current value of the assets could be materially different at the year end.</p> <p>Council Dwelling valuations are based on Existing Use Value, discounted by a factor to reflect that the assets are used for Social Housing (EUV-SH). The Social Housing adjustment factor is prescribed in government guidance, but this guidance indicates that where a valuer has evidence that this factor is different in the Council's area they can use their more accurate local factor. There is a risk that the Council's application of the valuer's assumptions is not in line with the statutory requirements and that the valuation is not supported by detailed evidence. (continued overleaf)</p>					<p>Our audit procedures will include:</p> <ul style="list-style-type: none">• Obtaining an understanding of the skills, experience and qualifications of the valuers, and considering the appropriateness of the Council's instructions to the valuer.• Obtaining an understanding of the basis of valuation applied by the valuers in the year.• Obtaining assurance on the appropriateness of the methodology and assumptions adopted by the Council's valuers.• Obtaining an understanding of the Council's approach to ensure that assets not subject to revaluation in 2021/22 are materially fairly stated.• Obtaining an understanding of the Council's approach to ensure that assets revalued through 2021/22 are materially fairly stated at the year end.• Sample testing the completeness and accuracy of underlying data provided by the Council and used by the valuers as part of their valuations.• Comparing the valuations to our in-house valuation expert's estimate of the valuation.• Using relevant market and cost data to assess the reasonableness of the valuation as at 31 March 2022.

5. Significant risks, key audit matters and other key judgement areas

Significant risks (continued)

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
2 (cont)	Valuation of Property, Plant & Equipment (Council & Group) (continued) The Council's two consolidated entities, MAHL and DML, account for their land & buildings at cost as permitted by their financial reporting framework. In consolidating their share of the two entities the Council must align the companies' accounting policies with their own. Consequently for the group consolidation exercise the Council engages an external valuer to value the land & buildings consistent with the Council's accounting policies.	○	●	●	●	

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5. Significant risks, key audit matters and other key judgement areas

Significant risks (continued)

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
3	<p>Valuation of Investment Property (Council)</p> <p>The CIPFA Code requires that where Investment Property assets are subject to revaluation, their year-end carrying value should reflect the fair value at that date.</p> <p>The valuation of Investment Property involves the use of a management expert (the valuer) and incorporates assumptions and estimates which impact materially on the reported value. There are risks relating to the valuation process.</p> <p>The Council employs valuation experts to provide valuations, however there remains a high degree of estimation uncertainty associated with the valuations of property, plant and equipment due to the significant judgements and number of variables involved.</p>	○	●	●	●	<p>Our audit procedures will include:</p> <ul style="list-style-type: none">• Obtaining an understanding of the skills, experience and qualifications of the valuer, and considering the appropriateness of the Council's instructions to the valuer.• Obtaining an understanding of the basis of valuation applied by the valuer in the year.• Obtaining assurance on the appropriateness of the methodology and assumptions adopted by the Council's valuer.• Comparing the valuation to our in-house valuation expert's estimate of the valuation.• Sample testing the completeness and accuracy of underlying data provided by the Council and used by the valuer as part of their valuations.

5. Significant risks, key audit matters and other key judgement areas

Significant risks (continued)

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
4	<p>Valuation of Council defined benefit pension liability (Council)</p> <p>The net pension liability represents a material element of the Council balance sheet. The Council is a scheduled employer body within the Greater Manchester Pension Fund, which had its last triennial valuation completed as at 31 March 2019. The valuation of the Local Government Pension Scheme relies on a number of assumptions, most notably around the actuarial assumptions, and actuarial methodology which results in the Council's overall valuation. There are financial assumptions and demographic assumptions used in the calculation of the liability, such as the discount rate, inflation rates and mortality rates. The assumptions should also reflect the profile of the Council's employees, and should be based on appropriate data. The basis of the assumptions is derived on a consistent basis year to year, or updated to reflect any changes.</p> <p>There is a risk that the assumptions and methodology used in valuing the pension obligations are not reasonable or appropriate to the Council's circumstances. This could have a material impact to the Council net pension liability in 2021/22.</p>	○	●	●	●	<p>Our audit procedures will include:</p> <ul style="list-style-type: none">• Obtaining an understanding of the skills, experience and qualifications of the actuary, and considering the appropriateness of the instructions to the actuary.• Obtaining confirmation from the auditor of the Greater Manchester Pension Fund that the Pension Fund has designed and implemented controls to prevent and detect material misstatement. This includes the controls in place to ensure data provided to the Actuary by the Pension Fund for the purposes of the IAS19 valuation of the gross asset and liability is complete and accurate.• Evaluating and challenging the work performed by the Pension Fund auditor on the Pension Fund investment assets, and considering whether the outcomes would materially impact our consideration of the Council's share of Pension Fund assets.• Reviewing the actuarial allocation of Pension Fund assets to the Council by the actuary, including comparing the Council's share of the assets to other corroborative information.• Reviewing the appropriateness of the Pension Asset and Liability valuation methodology applied by the Pension Fund Actuary, and the key assumptions included within the valuation. This includes comparing them to expected ranges, utilising information provided by PwC, consulting actuary engaged by the National Audit Office.• Agreeing the data in the IAS 19 valuation report provided by the Pension Fund Actuary for accounting purposes to the pension accounting entries and disclosures in the Council's financial statements.

5. Significant risks, key audit matters and other key judgement areas

Significant risks (continued)

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
5	<p>Consolidation of group financial statements</p> <p>The Council has made judgements around which of its group entities it consolidates into its Group Financial Statements, and how it consolidates the transactions and balances into the Group. The consolidation process is a complex process and involves material amounts of transactions and balances.</p> <p>The audit of the 2020/21 identified audit adjustments to be made to the group consolidation process.</p>	○	●	●	○	<p>Our approach to auditing the Group Financial Statements has been detailed in section 3.</p> <p>Our procedures on the consolidation process will include:</p> <ul style="list-style-type: none">• Reviewing the Council’s Group consolidation process.• Reviewing the Council’s judgements relating to the entities that are not consolidated into the Group Financial Statements.• Reviewing the method of consolidation of the consolidated group entities into the Group Financial Statements.• Agreeing the consolidated financial information to supporting evidence from the component financial statements.

5. Significant risks, key audit matters and other key judgement areas

Other key areas of management judgement and enhanced risks

	Description	Fraud	Error	Judgement	Expected KAM	Planned response
6	Accounting for Northwards Housing The Council brought its Arms Length Management Organisation, Northwards Housing, back in-house from 1 April 2021. The accounting treatment of such arrangements is determined by the CIPFA Code and International Financial Reporting Standards. The entries relating to Northwards Housing, particularly its net defined pension liability are material.	○	●	●	○	Our approach to auditing the accounting treatment of bringing Northwards Housing in-house will include: <ul style="list-style-type: none">• Critically evaluating the accounting treatment considering the Code and IFRS requirements.• Reviewing the actuary’s report to gain assurance that the pensions liabilities of Northwards are correctly recognised in the Council’s financial statements.• Reviewing the accuracy and completeness of any disclosures.
7	Accounting for Cash and Cash Equivalents The 2020/21 audit identified two issues with the accounting for cash and cash equivalents. The closedown processes omitted transactions received and paid on 31 March 2021 from the adjustments to the two main bank accounts, and cash to reimburse an imprest account was transferred to the wrong account.	○	●	●	○	Our approach to auditing the cash and cash equivalents will incorporate: <ul style="list-style-type: none">• Confirming that the correct adjustments have been made to the 31 March 2022 bank balance for those transactions received and paid on 31 March 2022.• Reviewing imprest accounts to confirm that balances are in line with our expectations.

06

Section 06:

Value for money arrangements work

6. Value for Money arrangements work

The framework for Value for Money arrangements work

We are required to form a view as to whether the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The NAO issues guidance to auditors that underpins the work we are required to carry out in order to form our view, and sets out the overall criterion and sub-criteria that we are required to consider.

The new Code of Audit Practice (the Code) changed the way in which we report our findings in relation to Value for Money (VFM) arrangements from 2020/21. Whilst we are still required to be satisfied that the Council has proper arrangements in place, we will now report by exception in our auditor's report where we have identified significant weakness in those arrangements.

In line with the new Code, the key output of our work on VFM arrangements will be a commentary on those arrangements which will form part of the Auditor's Annual Report.

Specified reporting criteria

The Code requires us to structure our commentary to report under three specified criteria:

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- 2
- 3
1. **Financial sustainability** – how the Council plans and manages its resources to ensure it can continue to deliver its services
2. **Governance** – how the Council ensures that it makes informed decisions and properly manages risks
3. **Improving economy, efficiency and effectiveness** – how the Council uses information about its costs and performance to improve the way it manages and delivers its services

Our approach

Our work falls into three primary phases as outlined opposite. We need to gather sufficient evidence to support our commentary on the Council's arrangements and to identify and report on any significant weaknesses in arrangements. Where significant weaknesses are identified we are required to report these to the Council and make recommendations for improvement. Such recommendations can be made at any point during the audit cycle and we are not expected to wait until issuing our overall commentary to do so.



Planning and risk assessment	Obtaining an understanding of the Council's arrangements for each specified reporting criteria. Relevant information sources will include: <ul style="list-style-type: none">• NAO guidance and supporting information• Information from internal and external sources including regulators• Knowledge from previous audits and other audit work undertaken in the year• Interviews and discussions with staff and members
Additional risk based procedures and evaluation	Where our planning work identifies risks of significant weaknesses, we will undertake additional procedures to determine whether there is a significant weakness.
Reporting	We will provide a summary of the work we have undertaken and our judgements against each of the specified reporting criteria as part of our commentary on arrangements. This will form part of the Auditor's Annual Report. Our commentary will also highlight: <ul style="list-style-type: none">• Significant weaknesses identified and our recommendations for improvement• Emerging issues or other matters that do not represent significant weaknesses but still require attention from the Council.

Identified significant weakness in VFM arrangements

The NAO's guidance requires us to carry out work at the planning stage to understand the Council's arrangements and to identify risks that significant weaknesses in arrangements may exist. Although we have not fully completed our planning and risk assessment work, based on the work carried out we have not identified any risks of significant weaknesses to date. This is consistent with our reporting from 2020/21 in which we did not identify any significant weaknesses in arrangements. We will report any subsequently identified risks to the Audit Committee on completion of our planning and risk identification work.

07

Section 07:

Fees for audit and other services

7. Fees for audit and other services

Fees for work as the Council’s appointed auditor

At this stage of the audit we have set our proposed fees in the table below. We will report any expected changes to the Audit Committee through the year, and at the completion of our audit work.

Area of work	2021/22 Proposed Fee	2020/21 Proposed Fee
Delivery of audit work under the NAO Code of Audit Practice ¹	159,519	159,519
Additional fees ²		
- Recurrent scope changes	TBC	TBC
- In-year scope changes	TBC	TBC
- Additional requirements for Manchester CC	TBC	TBC
Total fees	159,519	159,519

¹ The scale fee was initially set by PSAA in 2018.

² We have not yet completed and reported the outcome of the 2020/21 as reported previously to the Audit Committee. Consequently, we have not yet agreed the additional fees for that year. We expect that there will be additional fees to reflect the additional testing of valuations of land & buildings and investment property, additional pension liability procedures, and additional work to support the 2020/21 value for money report. We would expect to request similar additional fees in 2021/22 to those we agree in 2020/21.

Fees for non-audit work

We have not been engaged by the Council to carry out any additional work separate from our delivery of the NAO Code of Practice audit work. Before agreeing to undertake any additional work we will consider whether there are any actual, potential or perceived threats to our independence. Further information about our responsibilities in relation to independence is provided in section 8.

Services provided to other entities within the Council’s group

We have not been engaged by the Council’s consolidated group entities to carry out any work. If requested to carry out any additional work, and before agreeing to undertake any additional work, we consider whether there are any actual, potential or perceived threats to our independence. Further information about our responsibilities in relation to independence is provided in section 8.

08

Section 08:

Our commitment to independence

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8. Our commitment to independence

We are committed to independence and are required by the Financial Reporting Council to confirm to you at least annually in writing that we comply with the FRC’s Ethical Standard. In addition, we communicate any matters or relationship which we believe may have a bearing on our independence or the objectivity of the audit team.

We have not made arrangements for any of our activities as auditor to be conducted by another firm that is not a Mazars’ member firm. In section 3 we have outlined the experts that we intend to use as part of our audit. We will write to these experts seeking confirmation of their independence and will report this within our Audit Completion Report for the Audit Committee.

Based on the information provided by you and our own internal procedures to safeguard our independence as auditors, we confirm that in our professional judgement there are no relationships between us and any of our related or subsidiary entities, and you and your related entities creating any unacceptable threats to our independence within the regulatory or professional requirements governing us as your auditors.

We have policies and procedures in place which are designed to ensure that we carry out our work with integrity, objectivity and independence. These policies include:

- all partners and staff are required to complete an annual independence declaration;
- all new partners and staff are required to complete an independence confirmation and also complete computer based ethical training;
- rotation policies covering audit engagement partners and other key members of the audit team; and
- use by managers and partners of our client and engagement acceptance system which requires all non-audit services to be approved in advance by the audit engagement partner.

We confirm, as at the date of this document, that the engagement team and others in the firm as appropriate, Mazars LLP are independent and comply with relevant ethical requirements. However, if at any time you have concerns or questions about our integrity, objectivity or independence please discuss these with Suresh Patel in the first instance.

Prior to the provision of any non-audit services Suresh Patel will undertake appropriate procedures to consider and fully assess the impact that providing the service may have on our auditor independence.

No threats to our independence have been identified.

Any emerging independence threats and associated identified safeguards will be communicated in our Audit Completion Report.

09

Section 09: **Materiality and misstatements**

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9. Materiality and misstatements

Summary of initial materiality thresholds

Threshold	Group	Council
Overall materiality	£34,100,000	£29,500,000
Performance materiality	£22,165,000	£19,175,000
Specific materiality: Officer Remuneration bandings	N/A	£5,000 (reflecting one banding)
Trivial threshold for errors to be reported to Audit Committee	£1,023,000	£885,000

Materiality

Materiality is an expression of the relative significance or importance of a particular matter in the context of financial statements as a whole.

Misstatements in financial statements are considered to be material if they, individually or in aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Judgements on materiality are made in light of surrounding circumstances and are affected by the size and nature of a misstatement, or a combination of both. Judgements about materiality are based on consideration of the common financial information needs of users as a group and not on specific individual users.

The assessment of what is material is a matter of professional judgement and is affected by our perception of the financial information needs of the users of the financial statements. In making our assessment we assume that users:

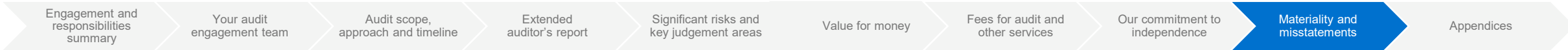
- have a reasonable knowledge of business, economic activities and accounts;
- have a willingness to study the information in the financial statements with reasonable diligence;
- understand that financial statements are prepared, presented and audited to levels of materiality;
- recognise the uncertainties inherent in the measurement of amounts based on the use of estimates, judgement and the consideration of future events; and
- will make reasonable economic decisions on the basis of the information in the financial statements.

We consider materiality whilst planning and performing our audit based on quantitative and qualitative factors. Whilst planning, we make judgements about the size of misstatements which we consider to be material and which provides a basis for determining the nature, timing and extent of risk assessment procedures, identifying and assessing the risk of material misstatement and determining the nature, timing and extent of further audit procedures.

The materiality determined at the planning stage does not necessarily establish an amount below which uncorrected misstatements, either individually or in aggregate, will be considered as immaterial. We revise materiality for the financial statements as our audit progresses should we become aware of information that would have caused us to determine a different amount had we been aware of that information at the planning stage.

Our materiality is set based on a benchmark of gross expenditure at the surplus/deficit on provision of services. We will identify a figure for materiality but identify separate levels for procedures design to detect individual errors, and a level above which all identified errors will be reported to the Audit Committee.

We consider that the gross expenditure at the surplus/deficit on provision of services remains the key focus of users of the financial statements and, as such, we base our materiality levels around this benchmark.



9. Materiality and misstatements

Materiality (continued)

Our materiality has been set at 1.5% of gross expenditure at the surplus/deficit on provision of services based on the draft 2021/22 financial statements. In setting materiality there were no additional qualitative factors which were considered.

We have identified one disclosure in the financial statements where we have set a separate specific lower materiality level:

- Disclosure of Senior Officer Remuneration: £5,000 reflecting the movement between bandings.

After setting initial materiality, we continue to monitor materiality throughout the audit to ensure that it is set at an appropriate level.

Performance Materiality

Performance materiality is the amount or amounts set by the auditor at less than materiality for the financial statements as a whole to reduce, to an appropriately low level, the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statements as a whole. Our initial assessment of performance materiality is based on our assessment of a medium inherent risk, meaning that we have applied 65% of overall materiality as our level of performance materiality.

Misstatements

We accumulate misstatements identified during the audit that are other than clearly trivial. We set a level of triviality for individual errors identified (a reporting threshold) for reporting to the Audit Committee that is consistent with the level of triviality that we consider would not need to be accumulated because we expect that the accumulation of such amounts would not have a material effect on the financial statements. Based on our preliminary assessment of overall materiality, our proposed triviality threshold is £1,023k for the Group and £885k for the Council based on 3% of overall materiality. If you have any queries about this please do not hesitate to raise these with Suresh Patel.

Reporting to the Audit Committee

The following three types of audit differences above the trivial threshold will be presented to the Audit Committee:

- A summary of adjusted audit differences;
- A summary of unadjusted audit differences; and
- A summary of disclosure differences (adjusted and unadjusted).



Appendix: Key communication points

Appendix: Key communication points

We value communication with Those Charged With Governance as a two way feedback process at the heart of our client service commitment. ISA 260 (UK) 'Communication with Those Charged with Governance' and ISA 265 (UK) 'Communicating Deficiencies In Internal Control To Those Charged With Governance And Management' specifically require us to communicate a number of points with you.

Relevant points that need to be communicated with you at each stage of the audit are outlined below.

Form, timing and content of our communications

We will present the following reports:

- Audit Strategy Memorandum;
- Audit Completion Report; and
- Auditor's Annual Report

These documents will be discussed with management prior to being presented to yourselves and their comments will be incorporated as appropriate.

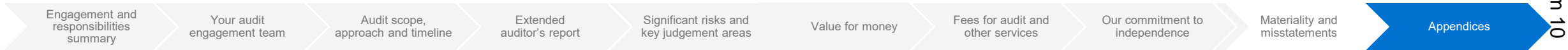
Key communication points at the planning stage as included in this Audit Strategy Memorandum

- Our responsibilities in relation to the audit of the financial statements;
- The planned scope and timing of the audit;
- Significant audit risks and areas of management judgement;

- Our commitment to independence;
- Responsibilities for preventing and detecting errors;
- Materiality and misstatements; and
- Fees for audit and other services.

Key communication points at the completion stage to be included in our Audit Completion Report

- Significant deficiencies in internal control;
- Significant findings from the audit;
- Significant matters discussed with management;
- Our conclusions on the significant audit risks and areas of management judgement;
- Summary of misstatements;
- Management representation letter;
- Our proposed draft audit report; and
- Independence.



Appendix: Key communication points

ISA (UK) 260 ‘Communication with Those Charged with Governance’, ISA (UK) 265 ‘Communicating Deficiencies In Internal Control To Those Charged With Governance And Management’ and other ISAs (UK) specifically require us to communicate the following:

Required communication	Where addressed
Our responsibilities in relation to the financial statement audit and those of management and those charged with governance.	Audit Strategy Memorandum
The planned scope and timing of the audit including any limitations, specifically including with respect to significant risks/ key audit matters.	Audit Strategy Memorandum
<div>Page 50</div> With respect to misstatements: <ul style="list-style-type: none"> uncorrected misstatements and their effect on our audit opinion; the effect of uncorrected misstatements related to prior periods; a request that any uncorrected misstatement is corrected; and in writing, corrected misstatements that are significant. 	Audit Completion Report
With respect to fraud communications: <ul style="list-style-type: none"> enquiries of the Audit Committee to determine whether they have a knowledge of any actual, suspected or alleged fraud affecting the entity; any fraud that we have identified or information we have obtained that indicates that fraud may exist; and a discussion of any other matters related to fraud. 	Audit Completion Report and discussion at Audit Committee Audit planning and clearance meetings

Appendix: Key communication points

Required communication	Where addressed
Significant matters arising during the audit in connection with the entity's related parties including, when applicable: <ul style="list-style-type: none">• non-disclosure by management;• inappropriate authorisation and approval of transactions;• disagreement over disclosures;• non-compliance with laws and regulations; and• difficulty in identifying the party that ultimately controls the entity.	Audit Completion Report
Significant findings from the audit including: our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures; significant difficulties, if any, encountered during the audit; significant matters, if any, arising from the audit that were discussed with management or were the subject of correspondence with management; <ul style="list-style-type: none">• written representations that we are seeking;• expected modifications to the audit report; and• other matters, if any, significant to the oversight of the financial reporting process or otherwise identified in the course of the audit that we believe will be relevant to the Audit Committee in the context of fulfilling their responsibilities.	Audit Completion Report
Significant deficiencies in internal controls identified during the audit.	Audit Completion Report
Where relevant, any issues identified with respect to authority to obtain external confirmations or inability to obtain relevant and reliable audit evidence from other procedures.	Audit Completion Report

Appendix: Key communication points

Required communication	Where addressed
Audit findings regarding non-compliance with laws and regulations where the non-compliance is material and believed to be intentional (subject to compliance with legislation on tipping off) and enquiry of the Audit Committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the Audit Committee may be aware of.	Audit Completion Report and Audit Committee meetings
With respect to going concern, events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including: <ul style="list-style-type: none"> whether the events or conditions constitute a material uncertainty; whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements; and the adequacy of related disclosures in the financial statements. 	Audit Completion Report
Reporting on the valuation methods applied to the various items in the consolidated financial statements including any impact of changes of such methods	Audit Completion Report
Explanation of the scope of consolidation and the exclusion criteria applied by the entity to the non-consolidated entities, if any, and whether those criteria applied are in accordance with the relevant financial reporting framework.	Audit Strategy Memorandum and/or Audit Completion Report as appropriate
Where applicable, identification of any audit work performed by component auditors in relation to the audit of the consolidated financial statements other than by Mazars' member firms	Audit Strategy Memorandum and/or Audit Completion Report as appropriate
Indication of whether all requested explanations and documents were provided by the entity	Audit Completion Report

Appendix: Key communication points

Required communication	Where addressed
Identification of each key audit partner involved in the audit	Audit Strategy Memorandum
Description of nature, frequency and extent of communication with the Audit Committee and other relevant bodies including dates of meetings	Audit Strategy Memorandum
Description of methodology used, including which categories of the balance sheet have been directly verified and which categories have been verified based on system and compliance testing, including an explanation of any substantial variations compared to the previous year	Audit Strategy Memorandum and/or Audit Completion Report as appropriate
Disclosure of quantitative level of materiality applied to the audit, any specific materiality levels applied to particular classes of transactions, account balances or disclosures, and qualitative factors considered when setting materiality	Audit Strategy Memorandum and/or Audit Completion Report as appropriate
Explanation of judgements about events or conditions identified during the course of the audit that may cast significant doubt on the entity's ability to continue as a going concern and whether they constitute a material uncertainty, and provide a summary of all guarantees, comfort letters, undertakings of public intervention and other support measures that have been taken into account when making a going concern assessment	Audit Strategy Memorandum and/or Audit Completion Report as appropriate
Reporting on significant deficiencies including whether or not the deficiency in question has been resolved by management	Audit Completion Report

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Mazars is an internationally integrated partnership, specialising in audit, accountancy, advisory, tax and legal services*. Operating in over 90 countries and territories around the world, we draw on the expertise of 40,400 professionals – 24,400 in Mazars’ integrated partnership and 16,000 via the Mazars North America Alliance – to assist clients of all sizes at every stage in their development.

*where permitted under applicable country laws.