

Notice of Meeting



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Governance Committee

Tuesday 1 October 2024 at 6.30 pm

in the Council Chamber, Council Offices,
Market Street, Newbury

Note: This meeting can be streamed live here: <https://www.youtube.com/@westberkshire/streams>

Date of despatch of Agenda: Friday 20 September 2024

For further information about this Agenda, or to inspect any background documents referred to in Part I reports, please contact Darius Zarazel on 01635519778
e-mail: Darius.Zarazel1@westberks.gov.uk

Further information and Minutes are also available on the Council's website at www.westberks.gov.uk



WestBerkshire
C O U N C I L

Agenda - Governance Committee to be held on Tuesday 1 October 2024 (continued)

To: Councillors Erik Pattenden (Chairman), Howard Woollaston (Vice-Chairman), Dominic Boeck, Jeremy Cottam, Laura Coyle, Billy Drummond, Owen Jeffery, David Marsh, Christopher Read, Simon Carey and David Southgate

Substitutes: Councillors Anne Budd, Dennis Benneyworth, Carolyne Culver, Paul Dick, Janine Lewis and Stephanie Steevenson

Agenda

	Page No.
1 Apologies To receive apologies for inability to attend the meeting (if any).	
2 Minutes To approve as a correct record the Minutes of the meeting of this Committee held on 16 July 2024.	1 - 4
3 Declarations of Interest To remind Members of the need to record the existence and nature of any personal, disclosable pecuniary or other registrable interests in items on the agenda, in accordance with the Members' Code of Conduct .	
4 Forward Plan Purpose: To consider the Forward Plan for the next 12 months.	5 - 6
5 KPMG Draft Audit Plan: 2023-24 Purpose: For the Governance Committee to consider the draft audit plan for 2023-24 from the Council's new external auditors, KPMG.	7 - 38



Sarah Clarke
Service Director: Strategy and Governance



Agenda - Governance Committee to be held on Tuesday 1 October 2024 *(continued)*

West Berkshire Council is committed to equality of opportunity. We will treat everyone with respect, regardless of race, disability, gender, age, religion or sexual orientation.

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Note: These Minutes will remain DRAFT until approved at the next meeting of the Committee

**GOVERNANCE COMMITTEE
MINUTES OF THE MEETING HELD ON
TUESDAY, 16 JULY 2024**

Councillors Present: Erik Pattenden (Chairman), Howard Woollaston (Vice-Chairman), Jeremy Cottam, Laura Coyle, David Marsh, Christopher Read and Stephanie Steevenson (Substitute)

Also Present: Simon Carey (Independent Audit Person), Julie Gillhespey (Audit Manager) and Joseph Holmes (Executive Director - Resources), Benjamin Ryan (Democratic Services Officer) David Southgate (Parish Council Representative) and Nicola Thomas (Service Lead - Legal & Democratic)

Apologies for inability to attend the meeting: Councillors Dominic Boeck, Billy Drummond and Owen Jeffery

PART I

19 Minutes

The Minutes of the meeting held on 16 April 2024 and 9 May 2024 were approved as a true and correct record and signed by the Chairman.

20 Declarations of Interest

Councillor Janine Lewis declared an interest in all Agenda Items as she worked for Home Care Agency, GoodOaks Home Care Reading and West Berks, but reported that, as her interest was a personal or an other registrable interest, but not a disclosable pecuniary interest, she determined to remain to take part in the debate and vote on the matter.

21 Forward Plan

The Committee considered the Governance Committee Forward Plan (Agenda Item 4).

Councillor Howard Woollaston queried why there were only two quarterly reports for risk management. Mr Holmes explained that the Governance Committee only received reports twice a year.

The Governance Committee **RESOLVED** to the Governance Committee Forward Plan be noted.

22 Monitoring Officer's Annual Report

The Committee considered a report (Agenda Item 5) concerning the Monitoring Officer's Annual Report. Ms Nicola Thomas introduced the report.

Councillor David Marsh acknowledged the improved atmosphere within West Berkshire Council (The Council) and attributed this to the new administration.

The Governance Committee **RESOLVED** to note the report.

23 Internal Audit Plan 2024-27

The Committee considered a report (Agenda Item 6) concerning the Internal Audit Plan 2024-27. Ms Julie Gillhespey introduced the report.

GOVERNANCE COMMITTEE - 16 JULY 2024 - MINUTES

Councillor Jeremy Cottam queried the risk categorisation of structure maintenance. Ms Gillhespey explained that this was to do with the projects that were planned and underway but was happy to revisit the issue. Mr Joseph Holmes explained that the risk level was based on internal audit procedures.

The Chairman sought clarification on the risk categories and Ms Gillhespey explained that there were three levels, which considered previous risk, whether there had been external review, the amount of funding and the complexity of the project. The amount of time between reviews depended on the categorisation.

Councillor Chris Read questioned whether the team delivering the plan was sufficiently resourced. Ms Gillhespey explained that the team was experienced and well-resourced. It was noted that changes in the plan may happen due to a change in priorities. Mr Holmes explained that the team would bring quarterly reports to the Committee to track progress.

Councillor Woollaston asked how the restructure had impacted the efficiency of the plan. Ms Gillhespey explained that because it meant there were less individuals who could sign off the reports.

Mr Simon Carey raised concerns over the Service Directors having the final sign off. Ms Gillhespey explained that the Service Directors could only sign off the reports, provide context to the report and see whether the recommendations are achievable within the set timeframe.

The Governance Committee **RESOLVED** to approve the Proposed Audit Plan and Audit Charter.

24 **Treasury Management Annual Report**

The Committee considered a report (Agenda Item 7) concerning Treasury Management Annual Report. Mr Holmes introduced the report.

Councillor Stephanie Steevenson queried paragraphs 5.8 and 7.2 of the report. Mr Holmes explained that the Council invests using three principles: security, liquidity and yield and the counterparties were approved by Members in the Investment Borrowing Strategy. Mr Holmes acknowledged that the Council was looking for a more ethical investment strategy.

The Governance Committee **RESOLVED** to approve both mid-year and annual treasury management reports.

25 **2024/25 KPMG Audit Planning Report**

It was noted that this item had been withdrawn.

26 **Revised Whistleblowing Policy**

The Committee considered a report (Agenda Item 9) concerning Revised Whistleblowing Policy. Ms Gillhespey introduced the report.

Councillor Chris Read asked questions around training and the Chief Risk Officer. Ms Gillhespey explained that training should be delivered by the experts within that field and that the team would not have the required expertise to know whether training had been sufficient. In regard to the Fraud and Whistleblowing Training the Audit Team would be best placed to do the training with no other teams qualified to do so. It was noted that previously the Chief Audit Officer also managed risk, however this had been separated to guarantee effective oversight. Mr Holmes explained that a Chief Risk Officer role was not statutory. Mr Catalin Bogos explained that the Risk Management Strategy outlined the roles that overlooked risk management.

GOVERNANCE COMMITTEE - 16 JULY 2024 - MINUTES

Councillor Marsh enquired into where schools fitted within the policy and Ms Gillehspey explained that the policy applied to all Council employees except schools.

Mr Carey questioned whether guidance had been published to aid members of the public in making enquiries. Ms Gillhespey explained this was part of the policy document.

Councillor Read queried point 3.2 within the policy. Ms Gillhespey explained that the Portfolio Holder may be made aware of the whistleblower depending on the significance of the case.

Councillor Read sought clarification on point 8.3 of the policy. Ms Gillhespey noted that there were many ways people could report anonymously, however there were no anonymous accounts for emails.

Councillor Read asked whether people were made aware that they would have to divulge their sources of information. Ms Gillhespey explained that the Council were unlikely to go to the Police if the whistleblower did not provide their sources as the Council were unlikely to have sufficient evidence to prosecute.

Councillor Read asked whether it would be appropriate to allow an appellant to bring a friend along to a hearing. Ms Gillhespey explained this would need to be part of a border Council policy and Mr Holmes explained this was something that could be explored.

Mr David Southgate stated that it would be useful to use the same terminology provided within the policy on the form.

The Governance Committee **RESOLVED** to approve the content of the revised policy.

27 **Annual Governance Statement**

The Committee considered a report (Agenda Item 10) concerning the Annual Governance Statement. Mr Holmes introduced the report.

Councillor Cottam asked about the Delivering Better Value scheme and seeking better funding. Mr Holmes explained that the Councils funding had been stagnant for 15 years and that the Delivering Better Value programme was a one-million-pound grant from Central Government to help reduce the high needs block deficit. It was added there was a nine-million-pound deficit at the end of the last year and that Central Government had put in place a statutory override on the deficit, however this was to run out in the following year, which would trigger a Section 114 notice.

Councillor Cottam raised concerns over the deficit and believed the Delivering Better Value scheme was not going to work.

Councillor Marsh expressed hope that the new Labour administration would be more supportive of Local Government and asked whether any support may come through from Central Government. Mr Holmes explained that the Council was not the only Local Authority (LA) in this situation and if the statutory override was to be pulled many LAs would collapse. It was added that extending the statutory override would only push the problem down the line.

Councillor Marsh questioned the reason for four-million-pounds being removed from school funding and showed dissatisfaction on the decision stating it would be a high ask for schools to provide the money. Mr Holmes answered that it was to reduce the deficit.

Councillor Cottam asked for the high needs block issue to be flagged at Full Council.

Councillor Marsh explained that people were not fully aware of the dilemma facing the Council and that someone needed to fully explain this.

Councillor Read wanted to see a clear statement on the outcome the decision to withdraw the money from the schools.

GOVERNANCE COMMITTEE - 16 JULY 2024 - MINUTES

The Chairman explained that the issue of school funding would be better placed with the Scrutiny Commission.

Councillor Laura Coyle emphasised the importance of putting the issue into perspective whilst drawing on the wider national context.

Councillor Read, whilst quoting the financial resilience table within the report, queried whether the lowering of inflation had had a positive impact. Mr Holmes stated that there were still some suppliers that wished to be paid above the inflation rate and that due to some of the markets having low supply it made negotiation difficult.

The Governance Committee **RESOLVED** to approve the AGS.

28 Governance Committee Annual Report

The Committee considered a report (Agenda Item 11) concerning the Governance Committee Annual Report. Mr Holmes introduced the report.

Councillor Read queried the Portfolio Holder for the report and Mr Holmes noted that Councillor Iain Cottingham's portfolio was the best fit as it encompassed risk.

The Governance Committee **RESOLVED** to note the report.

29 Strategic Risk Register Q4 2023/24

The Committee considered a report (Agenda Item 12) concerning the Strategic Risk Register Q4 2023/24. Mr Bogos introduced the report.

The Governance Committee **RESOLVED** to note the report.

30 Exclusion of Press and Public

31 Strategic Risk Register Q4 2023/24

(Paragraph 3 – information relating to financial/business affairs of particular person)

(Paragraph 5 - information relating to legal privilege) (Paragraph 6 - information relating to proposed action to be taken by the Local Authority)

The Committee considered an exempt report (Agenda Item 13) concerning the Strategic Risk Register Q4 2023.

The Governance Committee **RESOLVED** to note the report.

(The meeting commenced at 6.30 pm and closed at 7.55 pm)

CHAIRMAN

Date of Signature

Provisional Governance Committee Forward Plan 1 October 2024 – July 2025

No.	Ref.	Title		Lead Officer		
1 October 2024						
1.	G4508	2024/25 KPMG Audit Planning Report		Shannon Coleman-Slaughter		
19 November 2024						
2.	G4508	2022-2023 External Auditors Report		Joseph Holmes		
3.	G4582	Annual Internal Audit Report		Julie Gillhespey		
4.	EX4547	Risk Management Strategy 2024-2027		Joseph Holmes		
5.	G4553	Draft Financial Statements 2023/24 and Going Concern Assessment		Shannon Coleman-Slaughter		
6.	C4604	Constitutional Update		Sarah Clarke		
28 January 2025						
7.	G4549	Strategic Risk Register Q2 2024/25		Catalin Bogos		
8.	G4521	Mid-Year Treasury Report				
29 April 2025						
9.	G4605	Internal Audit Update Report - Quarter Three 2023/24		Julie Gillhespey		
10.	G4607	Financial Year End 2023-24 Year End Planning Document		Shannon Coleman-Slaughter		
May 2025						
11.		Election of Chairman				
12.		Election of Vice-Chairman				

Governance and Ethics Committee Forward Plan 27 June 2022 – 20 March 2023

July 2025						
13.	G4608	Internal Audit Plan 2024-27		Julie Gillhespey		
14.	G4609	Treasury Management Annual Report		Shannon Coleman-Slaughter		
15.	G4610	Strategic Risk Register Q4 2023/24		Catalin Bogos		
16.	G4611	Annual Governance Statement		Joseph Holmes		
17.	C4612	Governance Committee Annual Report		Joseph Holmes		
18.	C4613	Monitoring Officers Report		Sarah Clarke		

KPMG Draft audit plan: 2023-24

Committee considering report:	Governance Committee
Date of Committee:	October 2024
Portfolio Member:	Councillor Iain Cottingham
Report Author:	Joseph Holmes (Executive Director – Finance)
Forward Plan Ref:	G4508

1 Purpose of the Report

- 1.1 For the Governance Committee to consider the draft audit plan for 2023-24 from the Council’s new external auditors, KPMG.

2 Recommendation

- 2.1 To note the report and timescales included.

3 Implications and Impact Assessment

Implication	Commentary
Financial:	To note the increase in the audit fee – this is per the public sector audit appointment organisation’s scale fees. An investment bid will be required for the 2025-26 Budget.
Human Resource:	None
Legal:	None
Risk Management:	None
Property:	None
Policy:	None

	Positive	Neutral	Negative	Commentary
Equalities Impact:				No decision
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		X		
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		X		
Environmental Impact:		X		None identified
Health Impact:		X		None identified
ICT Impact:		X		None identified
Digital Services Impact:		X		None identified
Council Strategy Priorities:		X		None identified
Core Business:		X		None identified
Data Impact:		X		None identified
Consultation and Engagement:	None			

4 Executive Summary

4.1 This report is required as part of the External Audit assurance regime and sets out the new external auditor's plan for the audit of the 2023-24 financial statements.

5 Supporting Information

See the appendix for the audit plan

6 Other options considered

6.1 None – the Council could attempt to not have an external audit but this has been discounted as it's a statutory requirement and an important element of the wider governance and assurance process for the Council.

7 Conclusion

7.1 For members to consider, comment and note the report

8 Appendices

8.1 Appendix A – KPMG audit plan

Background Papers:

None

Subject to Call-In:

Yes: No:

The item is due to be referred to Council for final approval

Delays in implementation could have serious financial implications for the Council

Delays in implementation could compromise the Council's position

Considered or reviewed by Scrutiny Commission or associated Committees, Task Groups within preceding six months

Item is Urgent Key Decision

Report is to note only

Wards affected: all

Officer details:

Name: Joseph Homles
Job Title: Executive Director (Resources)
Tel No: 01635519619
E-mail: joseph.holmes1@westberks.gov.uk

West Berkshire Council

DRAFT - Report to the Audit Committee

External Audit Plan & Strategy for the year ending
31 March 2024

October 2024

Introduction

To the Audit and Governance Committee of West Berkshire Council

We are pleased to have the opportunity to meet with you on 1 October 2024 to discuss our audit of the financial statements of West Berkshire Council for the year ending 31 March 2024.

We have been appointed as your auditors by Public Sector Audit Appointments Ltd. The audit is governed by the provisions of the Local Audit and Accountability Act 2014 and in compliance with the NAO Code of Audit Practice. The NAO is consulting on a new Code of Audit Practice for 2023/24, therefore this plan will remain draft until the finalisation of that Code.

This report outlines our risk assessment and planned audit approach. Our planning activities are still ongoing and we will communicate any significant changes to the planned audit approach. We note that an audit opinion has not been expressed on the prior period, once the prior period audit opinion has been expressed we will communicate any significant changes to the planned approach. We provide this report to you in advance of the meeting to allow you sufficient time to consider the key matters and formulate your questions.

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The engagement team

Jonathan Brown is the engagement partner on the audit. He has over 20 years of industry experience.

Jon shall lead the engagement and is responsible for the audit opinion.

Other key members of the engagement team include Edward Mills, manager and Katya Andreychenko, audit in charge.

Yours sincerely,



Jonathan Brown

Partner - KPMG LLP

1 October 2024

How we deliver audit quality

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion. We consider risks to the quality of our audit in our engagement risk assessment and planning discussions.

We define 'audit quality' as being the outcome when audits are:

- Executed consistently, in line with the requirements and intent of applicable professional standards within a strong system of quality controls and
- All of our related activities are undertaken in an environment of the utmost level of objectivity, independence, ethics and integrity.

We depend on well planned timing of our audit work to avoid compromising the quality of the audit. This is also heavily dependent on receiving information from management and those charged with governance in a timely manner. The audit undertaken in the current year is dependent on the finalisation of the previous auditor's work over historical financial statements. We aim to complete all audit work no later than 2 days before audit signing. As you are aware, we will not issue our audit opinion until we have completed all relevant procedures, including audit documentation.

Overview of planned scope including materiality

Our materiality levels

We determined materiality for the financial statements at a level which could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements. We used a benchmark of expenditure which we consider to be appropriate given the sector in which the entity operates, its ownership and financing structure, and the focus of users.

We considered qualitative factors such as stability of legislation, lack of shareholders and stable business environment when determining materiality for the financial statements as a whole.

To respond to aggregation risk from individually immaterial misstatements, we design our procedures to detect misstatements at a lower level of materiality £7.6m / 65% of materiality driven by our expectations of normal level of undetected or uncorrected misstatements in the period. We also adjust this level further downwards for items that may be of specific interest to users for qualitative reasons, such as officers' remuneration.

We will report misstatements to the audit committee including:

- Corrected and uncorrected audit misstatements above £585k.
- Errors and omissions in disclosure (Corrected and uncorrected) and the effect that they, individually in aggregate, may have on our opinion.
- Other misstatements we include due to the nature of the item.

Control environment

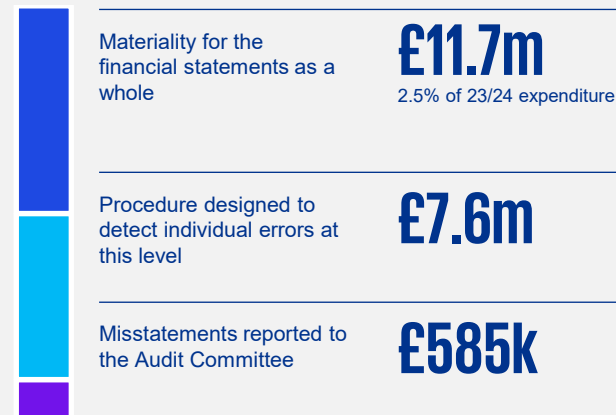
The impact of the control environment on our audit is reflected in our planned audit procedures. Our planned audit procedures reflect findings raised in the previous year and management's response to those findings.

Our reliance on -wide controls will be limited to our review of the consolidation process.

File review

We will undertake an appropriate prior year file review dependent on the final opinion issued by the previous auditors.

Materiality



Overview of planned scope including materiality (cont.)

Timing of our audit and communications

- We will maintain communication led by the engagement partner and manager throughout the audit. We set out below the form, timing and general content of our planned communications:
- Kick-off meeting with management in November 2023 where we outlined our audit approach and discussed management’s progress in key areas;
- Audit Committee meeting in October 2024 where we present our draft audit plan having been agreed earlier with management;
- Status meetings with management on a regular basis where we communicate progress on the audit plan, any misstatements, control deficiencies and significant issues;
- Closing meeting with management in December 2024 where we discuss the auditor’s report and any outstanding deliverables;
- Audit Committee meeting when the audit is substantially complete, where we communicate audit misstatements and significant control deficiencies; and
- Regular private meetings can also be arranged with the Committee chair at a frequency to be agreed together.

Given the large amount of consultation on-going in the sector, this audit schedule may be subject to change.

Using the work of others and areas requiring specialised skill

We outline below where, in our planned audit response to audit risks, we expect to use the work of others such as Internal Audit or require specialised skill/knowledge to perform planned audit procedures and evaluate results.

Others	Extent of planned involvement or use of work
Internal Audit	We will review the work of internal audit as part of our risk assessment procedures but will not place reliance on their work.
KPMG IT Audit	We will work closely with the IT Audit team, as part of risk assessment, procedures over the system change and data migration.
KPMG REVA (Real Estate Valuation Audit)	We will work alongside our property valuation team to ensure their involvement in the review of West Berkshire’s property portfolio is timely.
KPMG Pensions Centre of Excellence	The pensions audit team will perform all planning, risk assessment and substantive procedures over the LGPS account balances. A KPMG actuary will review and assess the underlying assumptions within the entity’s year end actuarial report.

Significant risks and Other audit risks

Our risk assessment draws upon our understanding of the applicable financial reporting framework, knowledge of the business, the sector and the wider economic environment in which West Berkshire Council operates.

We also use our regular meetings with senior management to update our understanding and take input from sector audit teams and internal audit reports.

Due to the current national levels of uncertainty there is an increased likelihood of significant risks emerging throughout the audit cycle that are not identified (or in existence) at the time we planned our audit. Where such items are identified we will amend our audit approach accordingly and communicate this to the Audit Committee.

Value for money

We are required to provide commentary on the arrangements in place for ensuring Value for Money is achieved at the Council and report on this via our Auditor's Annual Report. This will be published on the Council's website and include a commentary on our view of the appropriateness of the Council's arrangements against each of the three specified domains of Value for Money: financial sustainability; governance; and improving economy, efficiency and effectiveness.

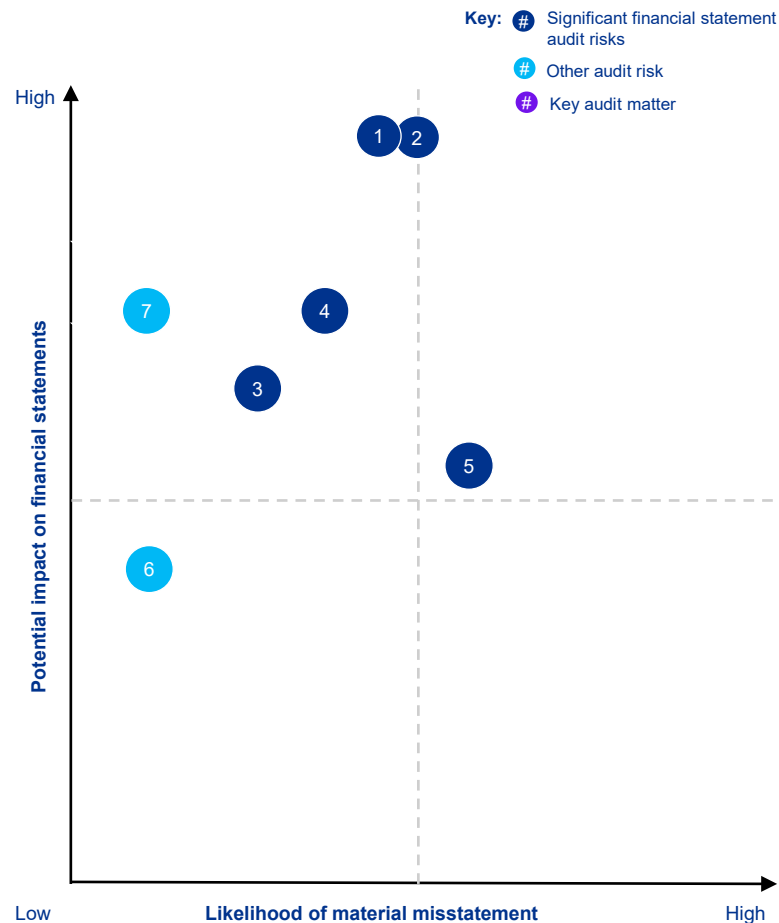
We will report the result of our risk assessment procedures to the next Committee, which is still to be finalised.

Significant risks

1. Valuation of land and buildings
2. Valuation of investment property
3. Management override of controls
4. Valuation of post retirement benefit obligations
5. Fraud risk from expenditure recognition

Other audit risks

6. Non-capital expenditure is inappropriately recognised as capital
7. Minimum revenue provision



Audit risks and our audit approach (cont.)

1

Valuation of land and buildings

The carrying amount of revalued Land & Buildings differs materially from the fair value



Significant audit risk

The Code requires that where assets are subject to revaluation, their year end carrying value should reflect the appropriate current value at that date. The Authority has adopted a rolling revaluation model which sees all land and buildings revalued over a five year cycle.

This creates a risk that the carrying value of assets not revalued in year differs materially from the year end current value.

A further risk is presented for those assets that are revalued in the year, which involves significant judgement and estimation on behalf of the valuer.



Planned response

We will perform the following procedures designed to specifically address the significant risk associated with the valuation:

- We will critically assess the independence, objectivity and expertise of the Council's valuers used in developing the valuation of the Council's properties at 31 March 2024;
- We will inspect the instructions issued to the valuers for the valuation of land and buildings to verify they are appropriate to produce a valuation consistent with the requirements of the CIPFA Code.
- We will compare the accuracy of the data provided to the valuers for the development of the valuation to underlying information;
- We will evaluate the design and implementation of controls in place for management to review the valuation and the appropriateness of assumptions used;
- We will challenge the appropriateness of the valuation of land and buildings; including any material movements from the previous revaluations. We will challenge key assumptions within the valuation as part of our judgement;
- We will agree the calculations performed of the movements in value of land and buildings and verify that these have been accurately accounted for in line with the requirements of the CIPFA Code;
- We will utilise our own valuation specialists to review the valuation report prepared by the Council's valuers to confirm the appropriateness of the methodology utilised; and
- Disclosures: We will consider the adequacy of the disclosures concerning the key judgements and degree of estimation involved in arriving at the valuation.

Audit risks and our audit approach (cont.)

2

Valuation of investment property

The carrying amount of revalued investment property differs materially from the fair value



Significant audit risk

The Code defines an investment property as one that is used solely to earn rentals or for capital appreciation or both. Property that is used to facilitate the delivery of services or production of goods as well as to earn rentals or for capital appreciation does not meet the definition of an investment property.

There is a risk that investment properties are not being held at fair value, as is required by the Code. At each reporting period, the valuation of the investment property must reflect market conditions. Significant judgement is required to assess fair value and management experts are often engaged to undertake the valuations.



Planned response

We will perform the following procedures designed to specifically address the significant risk associated with the valuation:

- We will critically assess the independence, objectivity and expertise of the valuers used in developing the valuation of the Council's investment property at 31 March 2024;
- We will inspect the instructions issued to the valuers to verify they are appropriate to produce a valuation consistent with the requirements of the CIPFA Code.
- We will compare the accuracy of the data provided to the valuers for the development of the valuation to underlying information;
- We will evaluate the design and implementation of controls in place for management to review the valuation and the appropriateness of assumptions used;
- We will challenge the appropriateness of the valuation; including any material movements from the previous revaluations. We will challenge key assumptions within the valuation as part of our judgement;
- We will agree the calculations performed of the movements and verify that these have been accurately accounted for in line with the requirements of the CIPFA Code;
- We will utilise our own valuation specialists to review the valuation report prepared by the Council's valuers to confirm the appropriateness of the methodology utilised; and
- Disclosures: We will consider the adequacy of the disclosures concerning the key judgements and degree of estimation involved in arriving at the valuation.

Audit risks and our audit approach (cont.)

3

Management override of controls(a)

Fraud risk related to unpredictable way management override of controls may occur



Significant audit risk

- Professional standards require us to communicate the fraud risk from management override of controls as significant.
- Management is 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.
- We have not identified any specific additional risks of management override relating to this audit.

Note: (a) Significant risk that professional standards require us to assess in all cases.



Planned response

Our audit methodology incorporates the risk of management override as a default significant risk.

- Assess accounting estimates for biases by evaluating whether judgements and decisions in making accounting estimates, even if individually reasonable, indicate a possible bias.
- Evaluate the selection and application of accounting policies.
- In line with our methodology, evaluate the design and implementation of controls over journal entries and post closing adjustments.
- Assess the appropriateness of changes compared to the prior year to the methods and underlying assumptions used to prepare accounting estimates.
- Assess the business rationale and the appropriateness of the accounting for significant transactions that are outside the Council's normal course of business, or are otherwise unusual.
- Test the operating effectiveness of controls over journal entries and post closing adjustments.
- We will analyse all journals through the year using data and analytics and focus our testing on those that meet our high risk criteria.

Audit risks and our audit approach (cont.)

4

Valuation of post retirement benefit obligations

An inappropriate amount is estimated and recorded for the defined benefit obligation



Significant audit risk

- The valuation of the post retirement benefit obligations involves the selection of appropriate actuarial assumptions, most notably the discount rate applied to the scheme liabilities, inflation rates and mortality rates. The selection of these assumptions is inherently subjective and small changes in the assumptions and estimates used to value the Council's pension liability could have a significant effect on the financial position of the Council.
- The effect of these matters is that, as part of our risk assessment, we determined that post retirement benefits obligation has a high degree of estimation uncertainty. The financial statements disclose the assumptions used by the Council in completing the year end valuation of the pension deficit and the year on year movements.
- We have identified this in relation to the following pension scheme memberships: Local Government Pension Scheme.



Planned response

We will perform the following procedures:

- Understand the processes the Council have in place to set the assumptions used in the valuation;
- Evaluate the competency, objectivity of the actuaries to confirm their qualifications and the basis for their calculations;
- Perform inquiries of the accounting actuaries to assess the methodology and key assumptions made, including actual figures where estimates have been used by the actuaries, such as the rate of return on pension fund assets;
- Agree the data provided by the audited entity to the Scheme Administrator for use within the calculation of the scheme valuation;
- Evaluate the design and implementation of controls in place for the Council to determine the appropriateness of the assumptions used by the actuaries in valuing the liability;
- Challenge, with the support of our own actuarial specialists, the key assumptions applied, being the discount rate, inflation rate and mortality/life expectancy against externally derived data;
- Confirm that the accounting treatment and entries applied by the Group are in line with IFRS and the CIPFA Code of Practice; and
- Consider the adequacy of the Council's disclosures in respect of the sensitivity of the deficit or surplus to these assumptions.

Audit risks and our audit approach

5 Fraud risk from expenditure recognition

Liabilities and related expenses for purchases of goods or services are not recorded in the correct accounting period



Significant audit risk

The Council has a statutory duty to balance their annual budget. Where a Council does not meet its budget this creates pressure on the Council's usable reserves and this in turn provides a pressure on the following year's budget. This is not a desirable outcome for management.

We consider this would be most likely to occur through understating accruals, for example to push back expenditure to 2024-25 to mitigate financial pressures.



Planned response

We will perform the following procedures in order to respond to the significant risk identified:

- We will evaluate the design and implementation of controls for developing manual expenditure accruals at the end of the year to verify that they have been completely and accurately recorded;
- We will inspect a sample of invoices of expenditure, in the period around 31 March 2024, to determine whether expenditure has been recognised in the correct accounting period and whether accruals are complete;
- We will select a sample of year end accruals and inspect evidence of the actual amount paid after year end in order to assess whether the accruals have been accurately recorded;
- We will inspect journals posted as part of the year end close procedures that decrease the level of expenditure recorded in order to critically assess whether there was an appropriate basis for posting the journal and the value can be agreed to supporting evidence; and
- We will perform a retrospective review of prior year accruals in order to assess the completeness with which accruals had been recorded at 31 March 2023 and consider the impact on our assessment of the accruals at 31 March 2024. We will also compare the items that were accrued at 31 March 2023 to those accrued at 31 March 2024 in order to assess whether any items of expenditure not accrued for as at 31 March 2024 have been done so appropriately.

Audit risks and our audit approach

Revenue – Rebuttal of Significant Risk

Professional standards require us to make a rebuttable presumption that the fraud risk from revenue recognition is a significant risk. Due to the nature of the revenue within the sector we have rebutted this significant risk. We have set out the rationale for the rebuttal of key types of income in the table below.

Description of Income	Nature of Income	Rationale for Rebuttal
Council tax	This is the income received from local residents paid in accordance with an annual bill based on the banding of the property concerned.	The income is highly predictable and is broadly known at the beginning of the year, due to the number of properties in the area and the fixed price that is approved annually based on a band D property: it is highly unlikely for there to be a material error in the population.
Business rates	Revenue received from local businesses paid in accordance with an annual demand based on the rateable value of the business concerned.	The income is highly predictable and is broadly known at the beginning of the year, due to the number of businesses in the area and the fixed amount that is approved annually: it is highly unlikely for there to be a material error in the population.
Fees and charges	Revenue recognised from receipt of fixed fee services, in line with the fees and charges schedules agreed and approved annually.	The income stream represents high volume, low value sales, with simple recognition. Fees and charges values are agreed annually. We do not deem there to be any incentive or opportunity to manipulate the income.
Grant income	Predictable income receipted primarily from central government, including for housing benefits.	Grant income at a local authority typically involves a small number of high value items and an immaterial residual population. These high value items frequently have simple recognition criteria and can be traced easily to third party documentation, most often from central government source data. There is limited incentive or opportunity to manipulate these figures.

Audit risks and our audit approach

6

Non-capital expenditure is inappropriately recognised as capital expenditure



Other audit risk

Although we have rebutted the presumed significant risk in relation to fraudulent expenditure recognition, capital accounting requirements are complex and may contain an element of judgement in determining which costs in a project can be capitalised and which need to be expensed.

Given the size of the Council's capital programme, we have identified an Other Audit Risk regarding revenue expenditure being inappropriately recognised as capital expenditure.



Planned response

We will perform the following procedures in order to respond to the risk identified:

- We will evaluate the design and implementation of controls for classifying expenditure as capital;
- We will scan the list of capital programmes for schemes which indicate an increased risk that the spend may be revenue in nature; and
- We will test a sample of capital expenditure incurred by the Council to ensure it is correctly capitalised.

Audit risks and our audit approach

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Minimum revenue provision



Other audit risk

Management have elected to alter the Minimum Revenue Provision calculation in the current financial year. This has the effect of reducing the impact on the General Fund through being less prudent over the future cost of current borrowings.

Given the Council's current financial position, there is a risk that the minimum revenue provision could be deliberately understated by management and is not sufficient to service future repayments.



Planned response

We will perform the following procedures in order to respond to the risk identified:

- We will review the methodology for the calculation of the minimum revenue provision and compare this with departmental guidance, the CIPFA Code and other relevant guidance, as well as review against the typical MRPs seen in the sector;
- We will confirm the calculation of the MRP is accurate and includes the capital expenditure anticipated in line with the Council's policy; and
- We will assess the wider impact of this change and the relevant disclosures made to the financial statements.

Audit risks and our audit approach

Impact of the general election and understanding the future timeline for audit

Due to the recent general election, the proposals consulted upon by the NAO and MHCLG (DLUHC) respectively for changes to the Code of Audit Practice to deal with the backlog of audits and the introduction of statutory publication deadlines for the audited accounts ('backstop' dates) cannot proceed until the new government has opportunity to consider whether it wishes to proceed with the proposals.

The NAO's Supplementary Guidance Note 04 (the most recent issued guidance to auditors) states that *'it is not possible to provide any further clarity to auditors on next steps'* beyond waiting on the above governmental decision/approval.

However, notwithstanding this KPMG are able to continue to deliver the substantive in-year 2023/24 audit work whilst we await the outcome of these discussions and decisions. We have been in close and regular communication with Council management about the best time to undertake our audit work, agreeing in advance of the outcome in order to provide certainty over the timing of our on-site fieldwork. We remain resourced and ready to complete the work in the timeframe agreed with Joseph and the team.

Whilst it is best not to speculate on the next government's view of the proposals, we do however expect that the return to a 'business as usual' state for audit opinions will take several years for entities where a disclaimed opinion in 2022/23 is likely. We will elaborate further on the expected audit practicalities and logistical implications of this in the Committee, however, it will still be a provisional view in advance of the conclusion of the above government, NAO and FRC deliberations.

Mandatory communications - additional reporting



Going concern

Under NAO guidance, including Practice Note 10 - A local authority's financial statements shall be prepared on a going concern basis; this is, the accounts should be prepared on the assumption that the functions of the authority will continue in operational existence for the foreseeable future. Transfers of services under combinations of public sector bodies (such as local government reorganization) do not negate the presumption of going concern.






However, financial sustainability is a core area of focus for our Value for Money opinion.

Additional reporting

Your audit is undertaken to comply with the Local Audit and Accountability Act 2014 which gives the NAO the responsibility to prepare an Audit Code (the Code), which places responsibilities in addition to those derived from audit standards on us. We also have responsibilities which come specifically from acting as a component auditor to the NAO. In considering these matters at the planning stage we indicate whether:

Work is completed throughout our audit and we can confirm the matters are progressing satisfactorily 	We have identified issues that we may need to report 	Work is completed at a later stage of our audit so we have nothing to report 
--	--	--

We have summarised the status of all these various requirements at the time of planning our audit below and will update you as our work progresses:

Type	Status	Response
Our declaration of independence		No matters to report. The engagement team and others in the firm, as appropriate, have complied with relevant ethical requirements regarding independence.
Issue a report in the public interest		We are required to consider if we should issue a public interest report on any matters which come to our attention during the audit. We have not identified any such matters to date.
Provide a statement to the NAO on your consolidation schedule		This "Whole of Government Accounts" requirement is fulfilled when we complete any work required of us by the NAO to assist their audit of the consolidated accounts of MHCLG (DHULC).
Provide a summary of risks of significant weakness in arrangements to provide value for money		We are required to report significant weaknesses in arrangements. Work to be completed at a later stage.
Certify the audit as complete		We are required to certify the audit as complete when we have fulfilled all of our responsibilities relating to the accounts and use of resources as well as those other matters highlighted above.

Mandatory communications

Type	Statements
Management’s responsibilities (and, where appropriate, those charged with governance)	<p>Prepare financial statements in accordance with the applicable financial reporting framework that are free from material misstatement, whether due to fraud or error.</p> <p>Provide the auditor with access to all information relevant to the preparation of the financial statements, additional information requested and unrestricted access to persons within the entity.</p>
Auditor’s responsibilities	<p>Our responsibilities set out through the NAO Code (communicated to you by the PSAA) and can be also found on their website, which include our responsibilities to form and express an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.</p>
Auditor’s responsibilities – Fraud	<p>This report communicates how we plan to identify, assess and obtain sufficient appropriate evidence regarding the risks of material misstatement of the financial statements due to fraud and to implement appropriate responses to fraud or suspected fraud identified during the audit.</p>
Auditor’s responsibilities – Other information	<p>Our responsibilities are communicated to you by the PSAA and can be also found on their website, which communicates our responsibilities with respect to other information in documents containing audited financial statements. We will report to you on material inconsistencies and misstatements in other information.</p>
Independence	<p>Our independence confirmation at page 24 discloses matters relating to our independence and objectivity including any relationships that may bear on the firm’s independence and the integrity and objectivity of the audit engagement partner and audit staff.</p>

West Berkshire Council

Value for money

Our approach

Value for money

For 2023/24 our value for money reporting requirements have been designed to follow the guidance in the Audit Code of Practice.

Our responsibility to conclude on significant weaknesses in value for money arrangements.

The main output is a narrative on each of the three domains, summarising the work performed, any significant weaknesses and any recommendations for improvement.

We have set out the key methodology and reporting requirements on this slide and provided an overview of the process and reporting on the following pages.

Risk assessment processes

Our responsibility is to assess whether there are any significant weaknesses in the Council's arrangements to secure value for money. Our risk assessment will continue to consider whether there are any significant risks that the Council does not have appropriate arrangements in place.

In undertaking our risk assessment we will be required to obtain an understanding of the key processes the Council has in place to ensure this, including financial management, risk management and partnership working arrangements. We will complete this through review of the Council's documentation in these areas and performing inquiries of management as well as reviewing reports, such as internal audit assessments.

Reporting

Our approach to value for money reporting aligns to the NAO guidance and includes:

- A summary of our commentary on the arrangements in place against each of the three value for money criteria, setting out our view of the arrangements in place compared to industry standards;
- A summary of any further work undertaken against identified significant risks and the findings from this work; and
- Recommendations raised as a result of any significant weaknesses identified and follow up of your previous auditor's recommendations.

The Council will be required to publish the commentary on its website at the same time as publishing its annual report online.

Financial sustainability

How the body manages its resources to ensure it can continue to deliver its services.

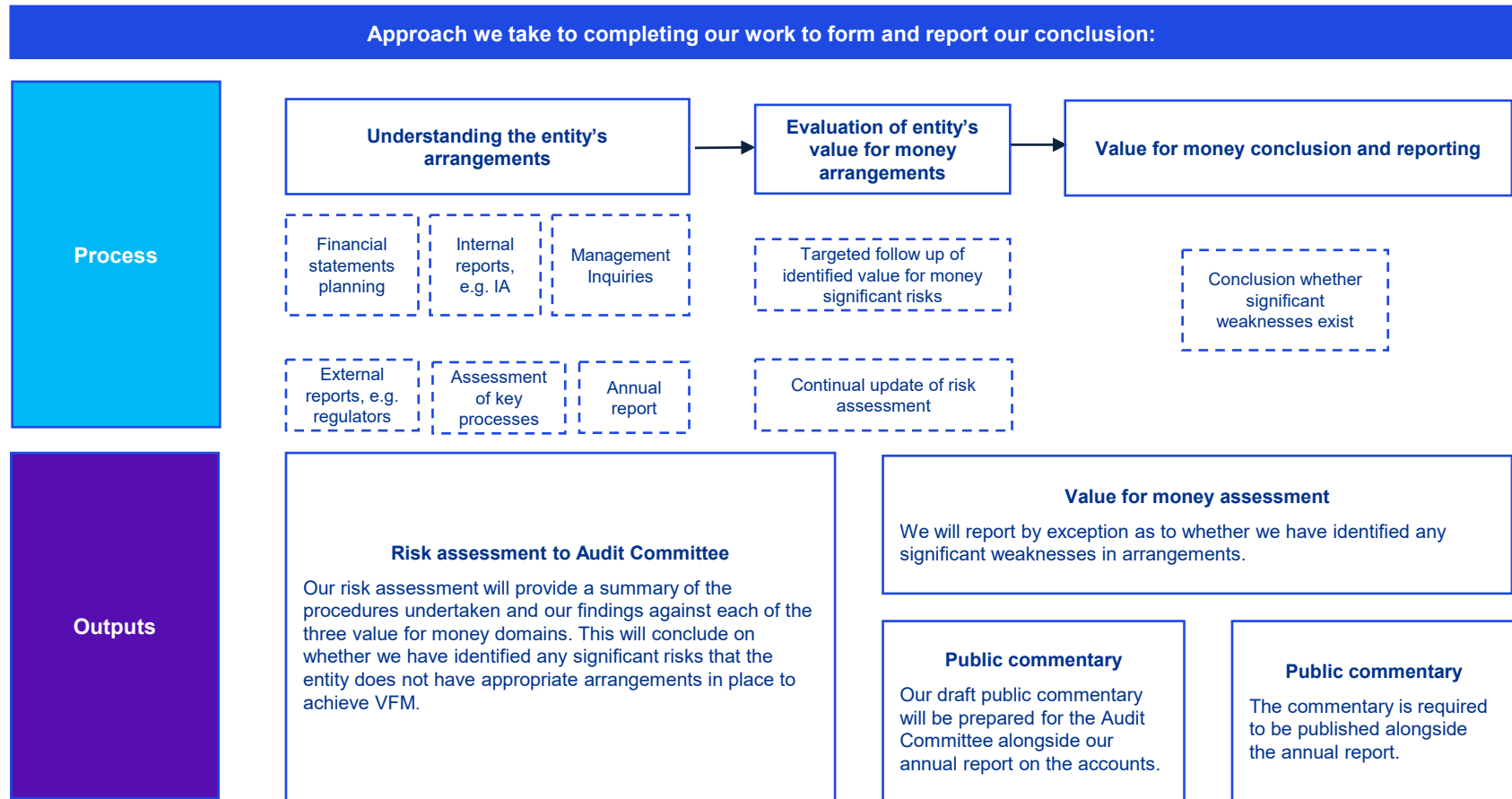
Governance

How the body ensures that it makes informed decisions and properly manages its risks.

Improving economy, efficiency and effectiveness

How the body uses information about its costs and performance to improve the way it manages and delivers its services.

Value for money



Appendix

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Audit team and rotation

Your audit team has been drawn from our specialist local government audit department and is led by key members of staff who will be supported by auditors and specialists as necessary to complete our work. We also ensure that we consider rotation of your audit partner and firm.



Jon is the partner responsible for our audit. He will lead our audit work, attend the Audit Committee and be responsible for the opinions that we issue.



Ed is the manager responsible for our audit. He will co-ordinate our audit work, attend the Audit Committee and ensure we are co-ordinated across our accounts and value for money work.



Katya is the in-charge responsible for our audit. She will be responsible for our on-site fieldwork. She will complete work on more complex section of the audit and oversee the work of our audit assistants.

To comply with professional standard we need to ensure that you appropriately rotate your external audit partner. There are no other members of your team which we will need to consider this requirement for:



This will be Jon's first year as your engagement lead. They are required to rotate every five years, extendable to seven with PSAA approval.

Audit cycle & timetable

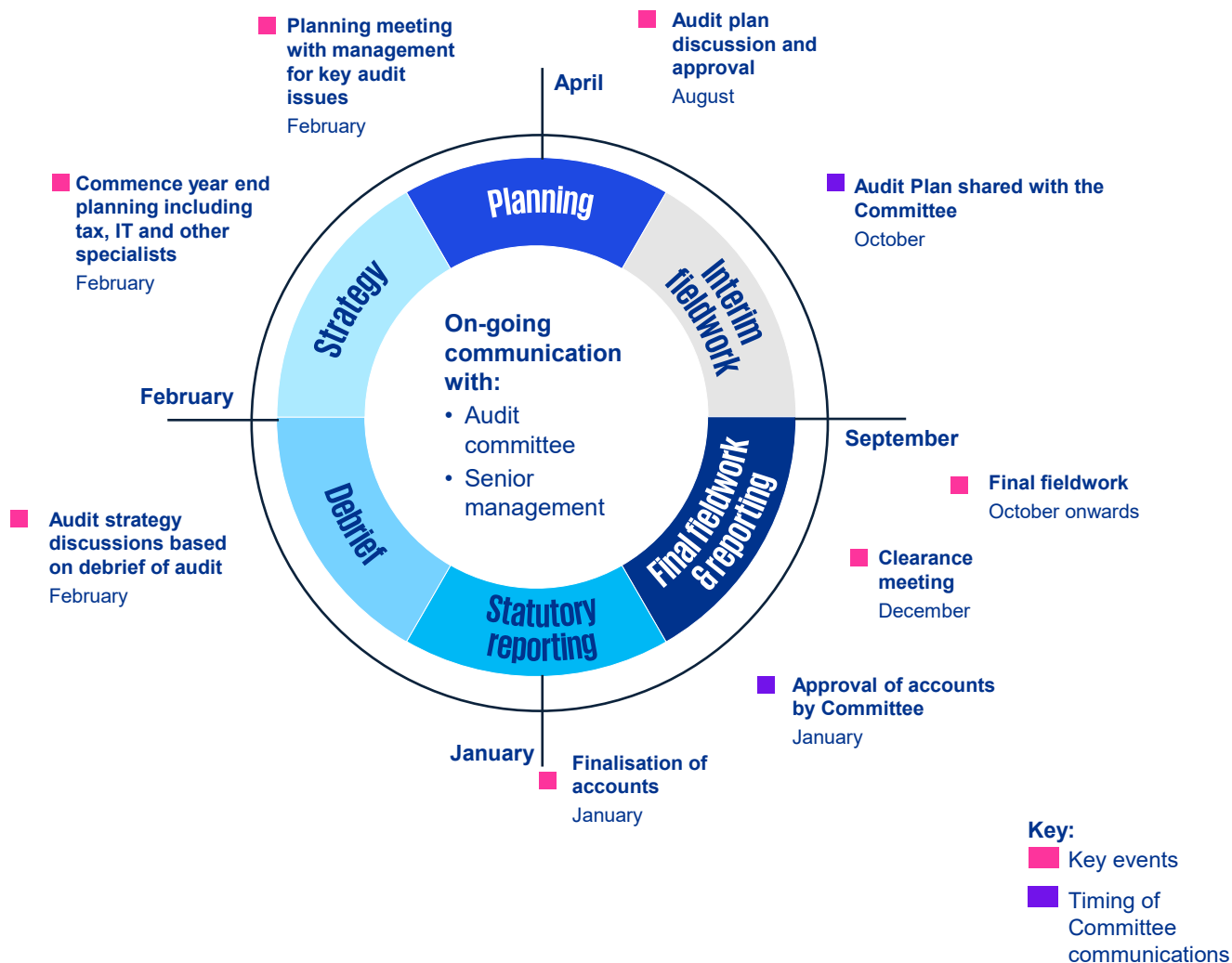
Our schedule January 2024– January 2025

We have worked with management to generate our understanding of the processes and controls in place at the Council in its preparation of the Statement of Accounts.

We have agreed with management an audit cycle and timetable that reflects our aim to sign our audit report by January 2025.

This being the first year of KPMG as auditor we have undertaken greater activities to understand the Council at the planning stage. This level of input may not be required in future years and may change our audit timings.

Given the large amount of consultation happening in regard to the scope and timing of local government this audit **schedule may be subject to change.**



Fees

Audit fee

Our fees for the year ending 31 March 2024 are set out in the PSAA Scale Fees communication and are shown below.

Entity	2023/24 (£'000)	2022/23 (£'000)
Statutory audit	272	88*
TOTAL	272	88

**This is the scale fee per PSAA. The actual fee charged by GT - your predecessor auditor, has not been published.*

As per PSAA's Scale Fees Consultation, the fees do not include new requirements of ISA315 revised (risk of material misstatement); or ISA 240 (auditor's responsibilities relating to fraud), which will shortly be communicated to management. The fees also assume no significant risks are identified as part of the Value for Money risk assessment. Additional fees in relation to these areas will be subject to the fees variation process as outlined by the PSAA.

Billing arrangements

Fees will be billed in accordance with the milestone completion phasing that has been communicated by the PSAA.

Basis of fee information

Our fees are subject to the following assumptions:

- The Council's audit evidence files are completed to an appropriate standard (we will liaise with you separately on this);
- Draft statutory accounts are presented to us for audit subject to audit and tax adjustments;
- Supporting schedules to figures in the accounts are supplied;
- The Council's audit evidence files are completed to an appropriate standard (we will liaise with management separately on this);
- A trial balance together with reconciled control accounts are presented to us;
- All deadlines agreed with us are met;
- We find no weaknesses in controls that cause us to significantly extend procedures beyond those planned;
- Management will be available to us as necessary throughout the audit process; and
- There will be no changes in deadlines or reporting requirements.

We will provide a list of schedules to be prepared by management stating the due dates together with pro-formas as necessary.

Our ability to deliver the services outlined to the agreed timetable and fee will depend on these schedules being available on the due dates in the agreed form and content.

Any variations to the above plan will be subject to the PSAA fee variation process.

Confirmation of Independence

We confirm that, in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and that the objectivity of the Partner and audit staff is not impaired.

To the Audit and Risk Committee members

Assessment of our objectivity and independence as auditor of West Berkshire Council

Professional ethical standards require us to provide to you at the planning stage of the audit a written disclosure of relationships (including the provision of non-audit services) that bear on KPMG LLP's objectivity and independence, the threats to KPMG LLP's independence that these create, any safeguards that have been put in place and why they address such threats, together with any other information necessary to enable KPMG LLP's objectivity and independence to be assessed.

This letter is intended to comply with this requirement and facilitate a subsequent discussion with you on audit independence and addresses:

- General procedures to safeguard independence and objectivity;
- Independence and objectivity considerations relating to the provision of non-audit services; and
- Independence and objectivity considerations relating to other matters.

General procedures to safeguard independence and objectivity

KPMG LLP is committed to being and being seen to be independent. As part of our ethics and independence policies, all KPMG LLP partners/directors and staff annually confirm their compliance with our ethics and independence policies and procedures including in particular that they have no prohibited shareholdings. Our ethics and independence policies and procedures are fully consistent with the requirements of the FRC Ethical Standard. As a result we have underlying safeguards in place to maintain independence through:

- Instilling professional values.
- Communications.
- Internal accountability.
- Risk management.
- Independent reviews.

We are satisfied that our general procedures support our independence and objectivity.

Independence and objectivity considerations relating to the provision of non-audit services

Summary of non-audit services

Facts and matters related to the provision of non-audit services and the safeguards put in place that bear upon our independence and objectivity, are set out on the table overleaf.

Confirmation of Independence

Disclosure	Description of scope of services	Principal threats to Independence	Safeguards Applied	Basis of fee	Value of Services Delivered in the year ended 31 March 2024 £k	Value of Services Committed but not yet delivered £k
1	Housing benefit grant certification	Management Self review Self interest	<ul style="list-style-type: none"> Standard language on non-assumption of management responsibilities is included in our engagement letter. The engagement contract makes clear that we will not perform any management functions. The work is performed after the audit is completed and the work is not relied on within the audit file. Our work does not involve judgement and are statements of fact based on agreed upon procedures. 	Fixed	-	38

Confirmation of Independence (cont.)

Summary of fees

We have considered the fees charged by us to the Council and its affiliates for professional services provided by us during the reporting period.

Fee ratio

The ratio of non-audit fees to audit fees for the year is anticipated to be 0.1: 1. We do not consider that the total non-audit fees create a self-interest threat since the absolute level of fees is not significant to our firm as a whole.

	2023/24
	£'000
Statutory audit	272
Other assurance services	38
Total Fees	310

Application of the FRC Ethical Standard 2019

Your previous auditors will have communicated to you the effect of the application of the FRC Ethical Standard 2019. That standard became effective for the first period commencing on or after 15 March 2020, except for the restrictions on non-audit and additional services that became effective immediately at that date, subject to grandfathering provisions.

AGN 01 states that when the auditor provides non-audit services, the total fees for such services to the audited entity and its controlled entities in any one year should not exceed 70% of the total fee for all audit work carried out in respect of the audited entity and its controlled entities for that year.

We confirm that as at 15 March 2020 we were not providing any non-audit or additional services that required to be grandfathered.

Independence and objectivity considerations relating to other matters

There are no other matters that, in our professional judgment, bear on our independence which need to be disclosed to the Audit and Risk Committee.

Confirmation of audit independence

We confirm that as of the date of this letter, in our professional judgment, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the partner and audit staff is not impaired.

This report is intended solely for the information of the Audit and Risk Committee of the Council and should not be used for any other purposes.

We would be very happy to discuss the matters identified above (or any other matters relating to our objectivity and independence) should you wish to do so.

Yours faithfully

KPMG LLP

KPMG's Audit quality framework

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion.

To ensure that every partner and employee concentrates on the fundamental skills and behaviours required to deliver an appropriate and independent opinion, we have developed our global Audit Quality Framework.

Responsibility for quality starts at the top through our governance structures as the UK Board is supported by the Audit Oversight Committee, and accountability is reinforced through the complete chain of command in all our teams.

■ Commitment to continuous improvement

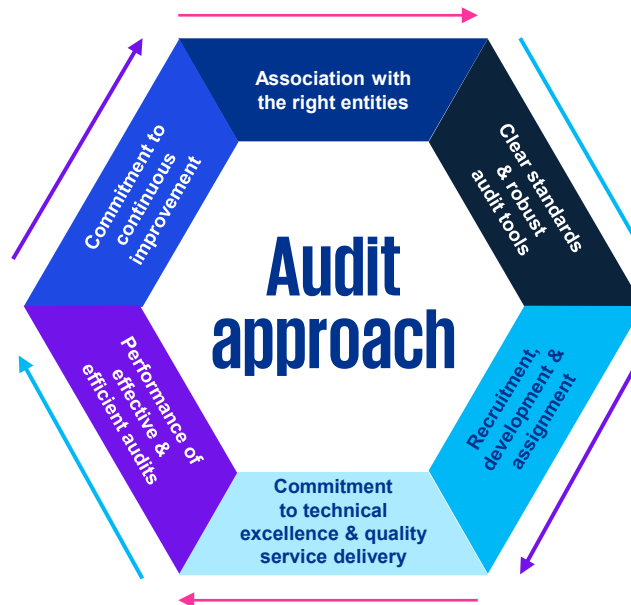
- Comprehensive effective monitoring processes
- Significant investment in technology to achieve consistency and enhance audits
- Obtain feedback from key stakeholders
- Evaluate and appropriately respond to feedback and findings

■ Performance of effective & efficient audits

- Professional judgement and scepticism
- Direction, supervision and review
- Ongoing mentoring and on the job coaching, including the second line of defence model
- Critical assessment of audit evidence
- Appropriately supported and documented conclusions
- Insightful, open and honest two way communications

■ Commitment to technical excellence & quality service delivery

- Technical training and support
- Accreditation and licensing
- Access to specialist networks
- Consultation processes
- Business understanding and industry knowledge
- Capacity to deliver valued insights



■ Association with the right entities

- Select entities within risk tolerance
- Manage audit responses to risk
- Robust client and engagement acceptance and continuance processes
- Client portfolio management

■ Clear standards & robust audit tools

- KPMG Audit and Risk Management Manuals
- Audit technology tools, templates and guidance
- KPMG Clara incorporating monitoring capabilities at engagement level
- Independence policies

■ Recruitment, development & assignment of appropriately qualified personnel

- Recruitment, promotion, retention
- Development of core competencies, skills and personal qualities
- Recognition and reward for quality work
- Capacity and resource management
- Assignment of team members and specialists



kpmg.com/uk

Some or all of the services described herein may not be permissible for KPMG audited entities and their affiliates or related entities.

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