



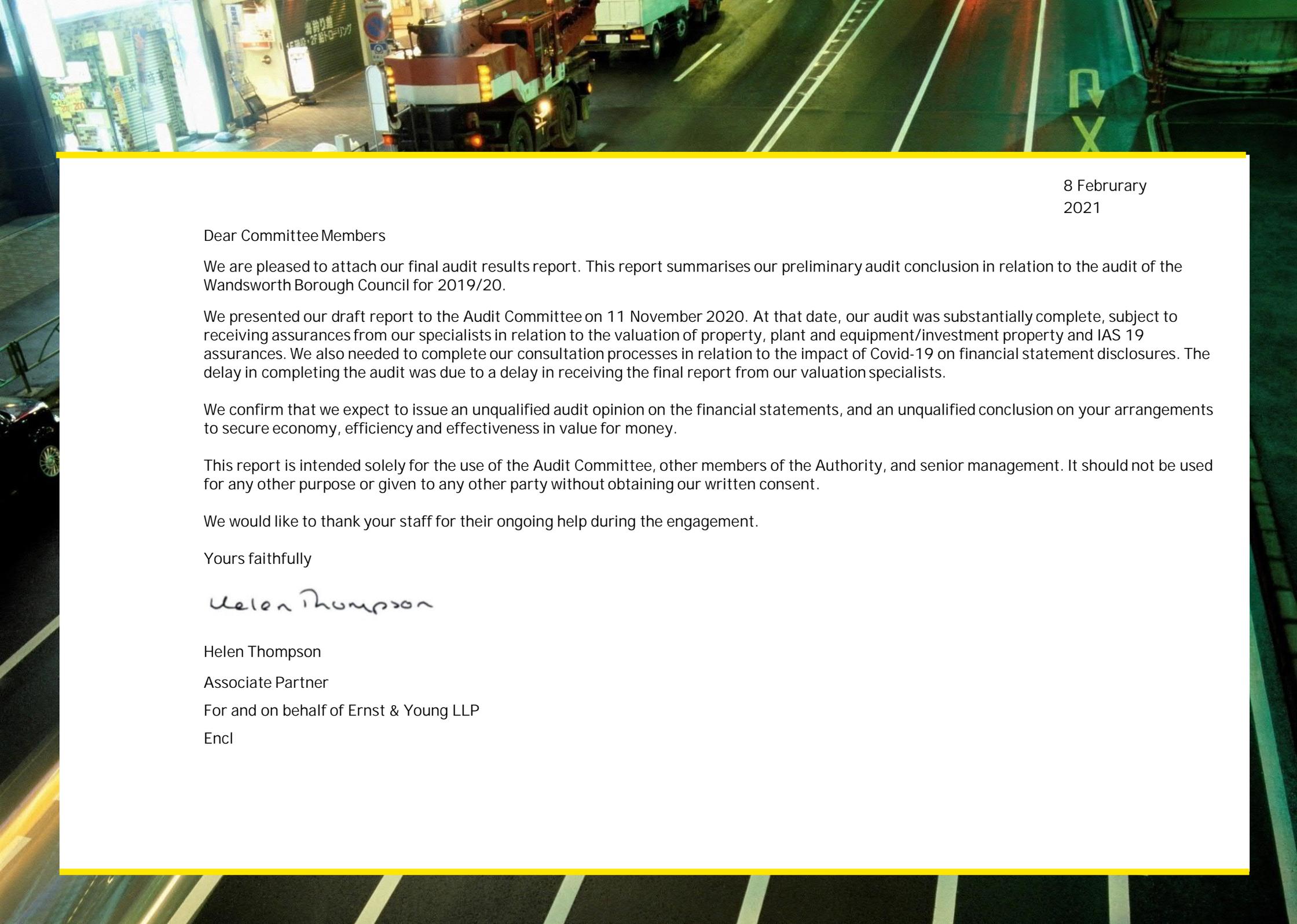
Wandsworth Borough  
Council  
Audit results report

Year ended 31 March 2020  
February 2021



**EY**

Building a better  
working world



8 February  
2021

Dear Committee Members

We are pleased to attach our final audit results report. This report summarises our preliminary audit conclusion in relation to the audit of the Wandsworth Borough Council for 2019/20.

We presented our draft report to the Audit Committee on 11 November 2020. At that date, our audit was substantially complete, subject to receiving assurances from our specialists in relation to the valuation of property, plant and equipment/investment property and IAS 19 assurances. We also needed to complete our consultation processes in relation to the impact of Covid-19 on financial statement disclosures. The delay in completing the audit was due to a delay in receiving the final report from our valuation specialists.

We confirm that we expect to issue an unqualified audit opinion on the financial statements, and an unqualified conclusion on your arrangements to secure economy, efficiency and effectiveness in value for money.

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

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

Yours faithfully



Helen Thompson

Associate Partner

For and on behalf of Ernst & Young LLP

Encl

# Contents



Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website ([www.psa.co.uk](http://www.psa.co.uk)). This Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The 'Terms of Appointment (updated April 2018)' issued by PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Audit Results Report is prepared in the context of the Statement of responsibilities / Terms and Conditions of Engagement. It is addressed to the Members of the audited body, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure – If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Hywel Ball, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.



# 01 Executive Summary

# Executive Summary

## Scope update

In our Audit Planning Report dated February 2020 and the Audit Planning Report Update circulated in August 2020, we provided you with an overview of our audit scope and approach for the audit of the financial statements. In the Update report, we also noted our revised materiality following receipt of the draft financial statements. Planning materiality is now £18.345 million, while performance materiality is £13.579 million and our audit threshold for reporting differences is £0.917 million.

Covid-19 has driven a small number of changes to the scope of our audit. These were included within the Audit Planning Report Update and we note two other changes below:

Information Produced by the Entity (IPE): We identified an increased risk around the completeness, accuracy, and appropriateness of information produced by the entity due to the inability of the audit team to verify original documents or re-run reports on-site from the Authority's systems. We undertook the following to address this risk:

- Used the screen sharing function of Microsoft Teams to evidence re-running of reports used to generate the IPE we audited; and
- Agree IPE to scanned documents or other system screenshots.

Consultation: additional EY consultation requirements have been put in place regarding the impact on auditor reports because of Covid-19.

The changes to audit risks, audit approach and auditor reporting requirements increased the level of work we needed to perform. This will have an impact on our audit fee, as set out on page 30.

## Status of the audit

We have completed our audit of Wandsworth Borough Council's financial statements for the year ended 31 March 2020 and have performed the procedures outlined in our Audit Planning Report.

We do not expect to issue the audit certificate at the same time as the audit opinion, as our work on the Authority's WGA submission is expected to be ongoing. There are ongoing technical issues with HM Treasury's OSCAR system, used to submit WGA data for audit, which mean that this work cannot yet be completed. These issues are impacting a number of authorities and are not specific to Wandsworth Borough Council. The audit certificate will be issued once this work is complete.

### Audit differences

The following audit differences have been adjusted within the financial statements:

- We identified £968,000 of property, plant and equipment additions which had been incorrectly classified as revenue expenditure funded from capital under statute.
- We identified one school which had achieved Academy status in year but had not been removed from the Authority's Balance Sheet following the loss of control over the assets. This resulted in adjustment of £12.624m.
- We found three assets under constructions wrongly classified as land and buildings. This resulted in an adjustment of £17.6m.
- The understatement of the value of Albermarle Primary School land, which had been overlooked by Wilks Head & Eve: £2.55m.
- The Council obtained an updated IAS19 report at the Balance Sheet date which resulted in an adjustment to the net liability arising on the defined pension benefit obligation of £33.992m.
- The analysis of Liquidity Risk in Note 47 - Nature and Extent of Risks Arising from Financial Instruments has been revised to include all contractual commitments (e.g. future interest liabilities). These had been excluded from the disclosure and total £3.997m.

A small number of other additions and amendments were also made to disclosures appearing in the financial statements as a result of our work, which included additional narrative at Note 1.2 Going Concern, setting out the Authority's Covid-19 going concern impact assessment.

The following audit differences have not been amended:

- Judgemental differences in valuation of Property, Plant & Equipment and Investment Properties between the Authority's valuer, Wilks Head & Eve, and EY's Real Estate team: £6.74m overstatement.
- Projected differences in valuation based upon differences in valuation of Investment Properties between the Authority's valuer, Wilks Head & Eve and EY's Real Estate team: £5.86m overstatement.

The sum of these uncorrected differences is below our tolerable error threshold.

## Executive Summary

### Areas of audit focus

Our Audit Planning Report and Audit Planning Report Update identified key areas of focus for our audit of the Wandsworth Borough Council financial statements. This report sets out our observations and conclusions, including our views on areas which might be conservative, and where there is potential risk and exposure. We summarise our consideration of these matters, and any others identified, in the "Areas of Audit Focus" section of this report.

**Audit findings and conclusion: Misstatements due to fraud or error**

We have not identified any evidence that management has overridden controls in order to prepare fraudulent financial statement balances or postings within the financial statements from the work completed to date.

**Audit findings and conclusion: Risk of incorrect capitalisation of revenue expenditure**

We have not identified any evidence of manipulation of expenditure through incorrect capitalisation of revenue expenditure.

**Audit findings and conclusion: Valuation of land and buildings/council buildings/investment properties**

We employed the use of our own expert to support the work in relation to the valuation of land, buildings, council buildings and investment properties, and to assess the impact of the material uncertainty issued by the Authority's valuer in their valuation report due to the impact of Covid-19. This identified various amendments to the draft financial statements as outlined in section 4. From the work carried out by the local team, we identified one school that had converted to an academy, but the value of the asset had not been written out of the Authority's financial statements. We also note there were differences between the valuation of some assets provided to the Authority by Wilks Head & Eve and EY's Real Estate team. These have not been updated in the financial statements. Further detail is included in Sections 2 and 4.

**Area of audit focus: Pension liability valuation**

We tested the Authority's pension liability valuation and assessed the work of the Authority's actuary, Barnett Waddingham. We are satisfied that the pension liability and associated balances within the financial statements are not materially misstated.

**Area of audit focus: Going concern and events after the balance sheet**

We are satisfied that the Authority's use of the going concern assumption is appropriate. However we have worked with the Authority to extend the disclosures on which the assumption is based. We have also reviewed the Authority's disclosure of events after the balance sheet date and requested amendment.

We ask you to review these and any other matters in this report to ensure:

- There are no other considerations or matters that could have an impact on these issues
- You agree with the resolution of the issue
- There are no other significant issues to be considered.

There are no matters, apart from those reported by management or disclosed in this report, which we believe should be brought to the attention of the Committee.

# Executive Summary

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## Control observations

We have not identified any significant deficiencies in the design or operation of an internal control that might result in a material misstatement in your financial statements and which is unknown to you.

## Value for money

Our work in relation to the value for money conclusion is complete. At the planning stage of our audit, we did not identify any significant risks in relation to the Authority's proper arrangements to secure economy, efficiency and effectiveness in the use of its resources. We updated our risk assessment, including considering the impact of Covid-19 for the year ending 31 March 2020; and we did not identify any new risks. We therefore have no matters to report. Please see section 5.

## Other reporting issues

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

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts (WGA) submission following the completion of the financial statements audit. As noted above, there are technical issues with the system used by authorities to submit WGA data which need to be resolved before this work can be completed. These issues are impacting a number of authorities and are not specific to Wandsworth Borough Council.

We have no other matters to report.

## Independence

We have no independence issues to bring to the attention of the Committee.

Please refer to Section 7 for our update on Independence.



## 02 Areas of Audit Focus



## Areas of Audit Focus

# Significant risk

### Misstatements due to fraud or error

#### What is the risk?

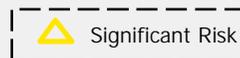
The financial statements as a whole are not free of material misstatements whether caused by fraud or error. As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.

We identify and respond to this fraud risk on every audit engagement.

#### What did we do?

In response to this risk, we:

- Identified fraud risks during the planning stages, which reflect the significant fraud risk recognised in this report (the risk of incorrect capitalisation of expenditure).
- Inquired of management about risks of fraud and the controls put in place to address those risks.
- Understood the oversight given by those charged with governance of management's processes over fraud.
- Considered the effectiveness of management's controls designed to address the risk of fraud.
- Determined an appropriate strategy to address those identified risks of fraud which is reflected in the significant risks documented on this file.
- Performing mandatory procedures regardless of specifically identified fraud risks, including:
  - Testing journals at year-end to ensure there are no unexpected or unusual postings. This included searching for inappropriate journals posted by senior officers; journals with certain narrative descriptions which may allude to override; journals that do not balance to nil; and material journals posted at year end. We were satisfied that those journals tested did not contain evidence of management override.
  - Undertaking a detailed review of accounting estimates for evidence of bias (such as the valuation of land, buildings and investment property valuation) and substantively testing unusual or unexpected transactions. No evidence of override was identified, and no unusual transaction have been identified from work completed to date.



#### What judgements are we focused on?

We focused on aspects of the financial statements which are open to estimation and judgment, which would facilitate management overriding controls:

- Journal entries subject to specific narrative descriptors, posted at certain times of the financial year or by certain individuals, and journals which exceed certain values;
- Material accounting estimates, such as the valuation of property, plant and equipment and investment property; and
- Unusual transactions anywhere in the financial statements.

#### What are our conclusions?

Our audit work has not identified any material issues, inappropriate judgements or unusual transactions which indicated that there had been any misreporting of the Authority's financial position, or that management had overridden control.

We have completed our journals testing. We are satisfied that journal entries had been posted properly and for genuine business reasons.

We have reviewed material estimates, such as the valuation of Property, Plant and Equipment, Council Dwellings and Investment Properties. Our work in these areas resulted in amendment to the financial statements, but no indication of fraud was identified.

There were no unusual transactions identified.



# Areas of Audit Focus

## Significant risk

### Risk of incorrect capitalisation of revenue expenditure

#### What is the risk?

Under ISA 240 there is a presumed risk that revenue may be misstated due to improper revenue recognition. In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.

We believe the risk of manipulation is most likely to manifest in the incorrect capitalisation of revenue expenditure through either inappropriate additions to Property, Plant and Equipment or incorrect classification of expenditure as revenue expenditure funded from capital under statute (REFCUS), as there is an incentive to reduce expenditure which is funded from Council Tax.

#### What judgements are we focused on?

We focused on the Authority's judgements to classify expenditure as either revenue or capital in nature. We tested a sample of items to confirm that the Authority's judgement was supported by sufficient evidence and was genuinely capital in nature.

#### What did we do?

In response to this risk, we:

- Tested a sample of PPE additions to ensure that the expenditure incurred and capitalised is clearly capital in nature. We also agreed ensured the transaction was supported by sufficient evidence to verify its value and the period it related to.
- Tested a sample of REFCUS, to ensure that it is appropriate for the revenue expenditure incurred to be financed from ring fenced capital resources. As with PPE additions, we also ensured these items were supported by sufficient evidence to verify the value and period it related to.
- Identified and tested significant journals transferring expenditure from revenue to capital codes on the general ledger at the end of the year. This provided assurance that the transactions were adequate, supported by evidence and valid.

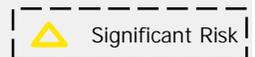
#### What are our conclusions?

We have found no evidence of incorrect capitalisation of revenue expenditure in either PPE additions or REFCUS. We were satisfied that the transactions tested were supported by evidence which confirmed the valuation, nature of the expenditure, period to which it related to and confirmed that it was appropriately capitalised.

We identified £968,000 of property, plant and equipment additions which had been incorrectly classified as REFCUS. However, we were satisfied that it was appropriate to capitalise these items.

Our review of journal items provided assurance that the transactions posted were adequate, supported by evidence and valid. To do this, we tested journals which Debit PPE / REFCUS and Credit Expense (all expense codes except capital codes) over a certain value.

We are therefore satisfied there is no material misstatement arising from incorrect capitalisation of revenue expenditure.





## Areas of Audit Focus

### Significant risk

#### Valuation of Land and Buildings, Council Dwellings and Investment Properties

##### What is the risk?

The nature and complexity of the Authority's asset base, together with the fact a number of errors were identified in the draft 2018/19 accounts, means the valuation of land, buildings and investment property represents a significant risk. The valuation of land and buildings is complex and is subject to a number of assumptions and judgements. A small movement in these assumptions can have a material impact on the financial statements.

We focused on those assumptions that directly impact the valuation of these assets – such as the use of information based on areas of the economy under stress (such as retail), location factors, useful lives and estimation of year on year valuation movements. In our 2018/19 audit, we identified a number of material errors relating to property, plant & equipment valuation which were corrected by management.

In light of the market volatility brought about by Covid-19, and the inclusion of a material uncertainty paragraph in the external valuer's report we have elevated the valuation of land, buildings, dwellings and investment properties to be treated as a significant risk.

##### What judgements are we focused on?

We focused on those assumptions that directly impact the valuation of these assets – such as the use of information based on areas of the economy under stress (such as retail), location factors, useful lives and estimation of year on year valuation movements.

##### What did we do?

In response to this risk, we initially planned to undertake the following procedures:

- Challenged the assumptions used by the Authority's valuer by reference to external evidence and our EY valuation specialists. This included considering significant or unusual movements in valuation and investments in areas of the economy under stress, such as retail. Additional work has been completed in this area, including detailed review of a sample of assets by our own valuer. The work of our EY valuation specialist was extended, as set out on the next page, to consider also the material uncertainty disclosed by Wilks Head & Eve in their valuation report to the Authority which arose due to Covid-19. Our internal valuation specialists have not yet reported their findings to us.
- Considered the work performed by the Authority's valuer (Wilks, Head & Eve), and confirmed that the scope of the work performed is adequate, they had the appropriate professional capabilities to complete the work and the results of their work is in line with our expectations.
- Sample tested key asset information used by the valuer in performing their valuation (e.g. building areas to support valuations based on price per square metre).
- Confirmed that the valuation was undertaken to ensure all assets required to be valued in line with the Authority's 5 year rolling programme had been completed, and that all investment property had been revalued in year as required by the Code.



## Areas of Audit Focus

# Significant risk

### What did we do? (cont)

- Confirmed the valuation was completed on up-to-date information regarding each asset such that any specific changes to assets that have occurred in year had been communicated to the valuer.
- Assessed those assets not subject to valuation in 2019/20 to confirm that the remaining asset base is not materially misstated.
- Reviewed and challenged where necessary any changes to useful economic lives as a result of the most recent valuation.
- Tested the accounting entries posted via journal to ensure they have been correctly processed in the financial statements.

We also undertook the following audit procedures in response to the Covid-19 pandemic:

- Considered the Authority's asset base by type of asset and valuation methodology, as impacts are likely to be more significant for assets valued on the basis of data from market transactions.
- Ensured the appropriate disclosure has been made in the accounts concerning the material uncertainty included in the Wilks Head & Eve report which arose due to the Covid-19 pandemic. We have included an Emphasis of Matter within our audit report to draw the attention of the reader of the accounts to the Authority's disclosure relating to the material uncertainty. We note this is not a qualification of the audit opinion.
- Involved EY Real Estates, our internal specialists on asset valuations, to consider the valuation approach in more detail for a sample of assets which we consider more likely to be impacted by Covid-19. Our valuation specialists undertook a detailed review of a sample of assets valued by Wilks Head & Eve to provide assurance over the above points. They also provided assurance and advice to the audit team in respect of the material uncertainty statement included in the Wilks Head & Eve valuation report.

### What are our conclusions?

Our work in response to this risk is complete. We have completed testing on the valuations, additions, disposals, existence, depreciation and impairment of property, plant and equipment.

We employed the use of our own expert to support the work in relation to the valuation of land, buildings and investment properties, and to assess the impact of the material uncertainty issued by the Authority's valuer in their valuation report due to the impact of Covid-19. This identified various amendments to the draft financial statements, which are set out on the following page.





## Areas of Audit Focus

# Significant risk

### What are our conclusions?

#### Valuation of PPE, Council Dwellings and Investment Properties

##### Adjusted audit differences:

We identified £968,000 of property, plant and equipment additions which had been incorrectly classified as REFCUS. We also found three assets under constructions wrongly classified as land and buildings with a total value of £17.6m. These misclassification has been adjusted in the final version of the accounts.

##### Unadjusted audit differences:

EYRE reviewed a sample of the Authority's assets which had been revalued by Wilks Head & Eve. In doing so, EYRE reported judgemental differences in a number of assets. One difference was identified relating to the Authority's land and buildings relating to Atheldene, which EYRE concluded was understated by £3.893m;

Other differences all related to investment properties, specifically 282 Magdalen Road, 70 Queen Street and 32 Old Street, which EYRE believed had been overstated in valuation by a total of £2.848m. These represent differences in opinion between EYRE and the Authority's valuer Wilks Head and Eve, and therefore have not been amended.

We considered the identified differences within investment properties and projected the valuation differences across other similar assets to produce a projected total difference of £5.86m. These have not been amended in the financial statements.

##### Emphasis of Matter in relation to Wilks Head & Eve Material Uncertainty:

We have concluded that our audit report will include an emphasis of matter paragraph, drawing attention to the material uncertainty included in the valuers report disclosed within Notes 4, 14 and 16 of the financial statements.

##### Accounting for academy schools:

We identified one school which had achieved Academy status in year but had not been removed from the Authority's Balance Sheet following the loss of control over the assets. This resulted in adjustment of £12.624m to the financial statements.



## Areas of Audit Focus

### Our response to areas of audit focus

#### Disclosures on Going Concern and Events after the Balance Sheet date

##### What is the risk?

Covid-19: The epidemic has created a number of financial pressures throughout local government, creating financial stress in either, or a combination of, increasing service demand leading to increased expenditure in specific services, and reductions in income sources. There is currently no clear statement of financial support from MHCLG that covers all financial consequences of Covid-19.

There have been a number of media stories in both the national press and trade publications raising the possibilities of an increase in chief financial officers using their s114 powers. This could be under s114(3), insufficient resources to fund likely expenditure. CIPFA's Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 sets out that organisations that can only be discontinued under statutory prescription shall prepare their accounts on a going concern basis. However, International Auditing Standard 570 Going Concern, as applied by Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom, still requires auditors to undertake sufficient and appropriate audit procedures to consider whether there is a material uncertainty on going concern that requires reporting by management within the financial statements, and within the auditor's report.

We are obliged to report on such matters within the section of our audit report 'Conclusions relating to Going Concern'. To do this, the auditor must review management's assessment of the going concern basis applying IAS1 Presentation of Financial Statements.

The auditor's report in respect of going concern covers a 12-month period from the date of the audit report, therefore the Authority's assessment will also need to cover this period.

Events after the balance sheet date: There is increased risk that further events after the balance sheet date concerning the current Covid-19 pandemic will need to be disclosed. The amount of detail required in the disclosure will need to reflect the specific circumstances of the Authority.

##### What judgements are we focused on?

In light of the unprecedented nature of Covid-19, its impact on the funding of public sector entities and uncertainty over the form and extent of government support, we have sought a documented and detailed consideration to support management's assertion regarding the going concern basis and particularly with a view whether there are any material uncertainties for disclosure.



## Areas of Audit Focus

# Our response to areas of audit focus

### What did we do and what are our conclusions?

We held discussions with the Director of Resources and Deputy Chief Executive to understand how the Authority concluded that the use of the going concern assumption was appropriate. Our work included discussion and detailed review of the Authority's updated medium term financial plans and cash flow forecasts, which form the basis of the Authority's consideration of the use of the going concern assumption.

We reviewed your updated going concern disclosures within the financial statements under IAS1, and associated financial viability disclosures within the Narrative Statement. In doing this we considered:

- The current and developing operating environment.
- Liquidity (operational and funding).
- Mitigating factors.
- Management information and forecasting.
- Sensitivities and stress testing.

The draft accounts did not include a detailed disclosure on going concern. Officers have used the assessment of the impact of Covid-19 on the Authority's finances to draft a new going concern disclosure note. We have scrutinised the financial assessment, cashflow, liquidity and borrowing forecasts, known outcomes, sensitivities, mitigating actions and key assumptions. We reviewed and further challenged the revised going concern disclosure, which appears in Note 1.2 to the accounts, and are satisfied that it is an adequate reflection of management's assessment that it remains appropriate to prepare the financial statements on a going concern basis. We considered the need to draw the attention of a reader of the accounts to the Authority's updated disclosure through the inclusion of an emphasis of matter paragraph in our audit report, but have ultimately concluded this is not necessary.

We considered whether the Authority's disclosures for events after the balance sheet date were appropriate and challenged whether the disclosure in the draft financial statements was required. This resulted in amendment to the disclosure in Note 6: Events after the Balance Sheet date to remove reference to Covid-19 as it can be considered an event that occurred prior to the Balance Sheet date.

Following amendment of the disclosure note, we are satisfied that the Events after the Balance Sheet disclosure is properly reported.



## Areas of Audit Focus

# Our response to areas of audit focus



### Further details on procedures/work performed

#### Pension liability valuation

The Local Authority Accounting Code of Practice and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Wandsworth Borough Council. The Authority's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Authority's balance sheet.

The information disclosed is based on the IAS 19 report issued to the Authority by the actuary. Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates. For 2019/20, we also recognise the fact that a full triennial valuation of the fund is being undertaken.

We reviewed the Authority's IAS 19 reports which were used to prepare the financial statements and noted they were based upon information submitted to the actuary in February 2020 - including asset valuations. We asked the Authority to consider whether there was likely to be a material impact on the IAS 19 report between February and the end of March 2020 and we concluded it was likely. Further developments have occurred in respect of consultations in respect of the McCloud ruling and the Goodwin judgement of 30 June 2020. The Authority requested revised IAS 19 reports from the Actuary, which were provided to the audit team mid-September. These reports have taken into account the impact of the McCloud judgement. The impact of Goodwin is not material. We have reviewed these updated reports and are satisfied that they are appropriate and properly reflected in the revised financial statements. We have assessed the work of the actuary, including the assumptions they have used, by relying on the work of PWC - consulting actuaries commissioned by the National Audit Office for all local government sector auditors, and considering any relevant reviews by the EY actuarial team.

We have reviewed and tested the accounting entries and disclosures made within the Authority's financial statements in relation to IAS19. We also requested that the EY pension audit team undertake testing on the data submitted to the actuary as part of the triennial review. This testing identified not issues to report.



# 03 Audit Report



# Audit Report

## Audit report

### Our opinion on the financial statements

#### INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF WANDSWORTH BOROUGH COUNCIL

##### Opinion

We have audited the financial statements of Wandsworth Borough Council for the year ended 31 March 2020 under the Local Audit and Accountability Act 2014. The financial statements comprise the: Comprehensive Income and Expenditure Statement, Balance Sheet, Movement in Reserves Statement, Cash Flow Statement and the related notes 1 to 48; Collection Fund and the related notes; Housing Revenue Income and Expenditure Statement, Movement on the HRA Account and the related notes 1 to 6; and the Consolidated Group Accounts comprising the Group Comprehensive Income and Expenditure Statement, Group Balance Sheet, Group Movement in Reserves Statement, and Group Cash Flow Statement.

The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

In our opinion the financial statements:

- give a true and fair view of the financial position of Wandsworth Borough Council and Group as at 31 March 2020 and of its expenditure and income for the year then ended; and
- have been prepared properly in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

##### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report below. We are independent of Wandsworth Borough and Group in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard and the Comptroller and Auditor General's AGN01, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

##### Emphasis of matter – Property, Plant and Equipment and Investment Property valuation

We draw attention to Note 4 Assumptions Made about the Future and Other Major Sources of Estimation Uncertainty, Note 14 Property, plant and equipment and Note 16 Investment properties which describes the valuation uncertainty the Authority is facing as a result of COVID-19 in relation to property valuations. Our opinion is not modified in respect of this matter.

##### Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Director of Resources and Deputy Chief Executive's use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or



# Audit Report

## Audit report

### Our opinion on the financial statements

- the Director of Resources and Deputy Chief Executive has not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the Authority's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

#### Other information

The other information comprises the information included in the Accounts for the year 2019/20 other than the financial statements and our auditor's report thereon. The Director of Resources and Deputy Chief Executive is responsible for the other information.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

Opinion on other matters prescribed by the Local Audit and Accountability Act 2014

Arrangements to secure economy, efficiency and effectiveness in the use of resources

In our opinion, based on the work undertaken in the course of the audit, having regard to the guidance issued by the Comptroller and Auditor General in April 2020, we are satisfied that, in all significant respects, Wandsworth Borough Council put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020.

Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Council;
- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014; or



# Audit Report

## Audit report

### Our opinion on the financial statements

- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

#### Responsibility of the Director of Resources and Deputy Chief Executive

As explained more fully in the Statement of the Responsibilities set out on pages 13, the Director of Resources and Deputy Chief Executive is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20, and for being satisfied that they give a true and fair view.

In preparing the financial statements, the Director of Resources and Deputy Chief Executive is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Authority either intends to cease operations, or have no realistic alternative but to do so.

The Authority is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

#### Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report.

#### Scope of the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We have undertaken our review in accordance with the Code of Audit Practice, having regard to the guidance on the specified criterion issued by the Comptroller and Auditor General in April 2020, as to whether Wandsworth Borough Council had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. The Comptroller and Auditor General determined this criterion as that necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether Wandsworth Borough Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020.



# Audit Report

## Audit report

### Our opinion on the financial statements

We planned our work in accordance with the Code of Audit Practice. Based on our risk assessment, we undertook such work as we considered necessary to form a view on whether, in all significant respects, Wandsworth Borough Council had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The Code of Audit Practice issued by the National Audit Office requires us to report to you our conclusion relating to proper arrangements.

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

#### Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate until we have completed the work necessary to issue our assurance statement in respect of the Authority's Whole of Government Accounts consolidation pack. We are satisfied that this work does not have a material effect on the financial statements or on our value for money conclusion.

Until we have completed these procedures we are unable to certify that we have completed the audit of the accounts in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.

#### Use of our report

This report is made solely to the members of Wandsworth Borough Council, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and for no other purpose, as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Wandsworth Borough Council and Wandsworth Borough Council's members as a body, for our audit work, for this report, or for the opinions we have formed.

Helen Thompson (Key Audit Partner)

Ernst & Young LLP (Local Auditor)

Southampton

Date



# 04 Audit Differences



## Audit Differences

In the normal course of any audit, we identify misstatements between amounts we believe should be recorded in the financial statements and the disclosures and amounts actually recorded. These differences are classified as “known” or “judgemental”. Known differences represent items that can be accurately quantified and relate to a definite set of facts or circumstances. Judgemental differences generally involve estimation and relate to facts or circumstances that are uncertain or open to interpretation.

### Summary of adjusted and unadjusted differences

We highlight the following misstatements greater than £0.917 million which have been corrected by management that were identified during the course of our audit:

- We identified £968,000 of property, plant and equipment additions which had been incorrectly classified as REFCUS. We identified one school which had achieved Academy status in year but had not been removed from the Authority’s Balance Sheet following the loss of control over the assets. This resulted in adjustment of £12.624m.
- We found three assets under constructions wrongly classified as land and buildings. This resulted in an adjustment of £17.6m.
- The understatement of the value of Albermarle Primary Schools land, which had been overlooked by Wilks Head & Eve: £2.55m.
- The Authority obtained an updated IAS19 report at the Balance Sheet date which resulted in an adjustment to the net liability arising on the defined pension benefit obligation of £33.992m.
- The analysis of Liquidity Risk in Note 47 - Nature and Extent of Risks Arising from Financial Instruments has been revised to include all contractual commitments (e.g. future interest liabilities). These had been excluded from the disclosure and total £3.997m.

A small number of other additions and amendments were also made to disclosures appearing in the financial statements as a result of our work, which included additional narrative at Note 1.2 Going Concern, setting out the Authority’s Covid-19 going concern impact assessment.

The following audit differences have not been amended:

- Judgemental differences in valuation of Property, Plant & Equipment and Investment Properties between the Authority’s valuer, Wilks Head & Eve, and EY’s Real Estate team: £6.74m overstatement.
- Projected differences in valuation based upon differences in valuation of Investment Properties between the Authority’s valuer, Wilks Head & Eve and EY’s Real Estate team: £5.86m overstatement.

The sum of these uncorrected differences is below our tolerable error.

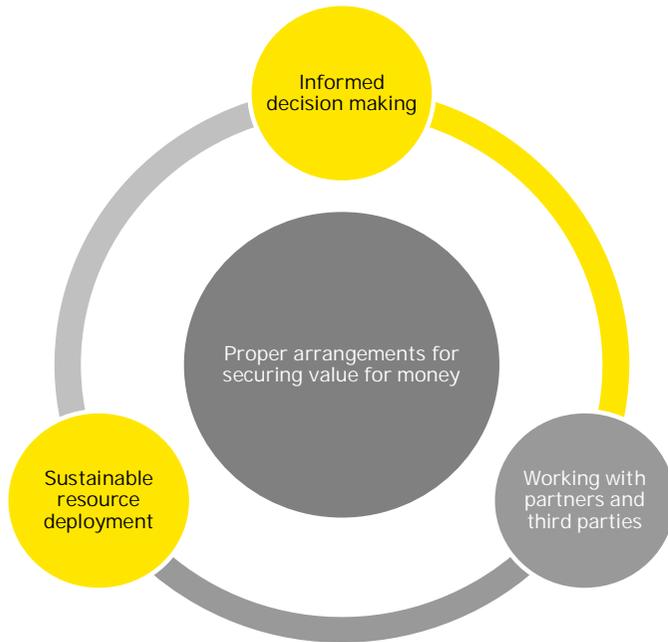


05

## Value for Money



# Value for Money



## Background

We are required to consider whether the Authority has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. This is known as our value for money conclusion.

For 2019/20 this is based on the overall evaluation criterion:

"In all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people"

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

- Take informed decisions;
- Deploy resources in a sustainable manner; and
- Work with partners and other third parties.

In considering your proper arrangements, we draw on the requirements of the CIPFA/SOLACE framework for local government to ensure that our assessment is made against a framework that you are already required to have in place and to report on through documents such as your annual governance statement.

## Impact of covid-19 on our Value for Money assessment

On 16 April 2020, the National Audit Office published an update to auditor guidance in relation to the 2019/20 Value for Money assessment in the light of Covid-19. This clarified that in undertaking the 2019/20 Value for Money assessment auditors should consider local authorities' response to Covid-19 only as far as it relates to the 2019/20 financial year. Only where clear evidence comes to the auditor's attention of a significant failure in arrangements as a result of Covid-19 during the financial year, would it be appropriate to recognise a significant risk in relation to the 2019-20 VFM arrangements conclusion. No additional risk has been identified.

## Overall conclusion

At the planning stage of our audit, we did not identify any significant risks in relation to the Authority's proper arrangements to secure economy, efficiency and effectiveness in the use of its resources. We updated our risk assessment, including considering the impact of Covid-19 for the year ending 31 March 2020; and we did not identify any new risks. We therefore have no matters to report.



## 06 Other reporting issues

# Other reporting issues

### Consistency of other information published with the financial statements, including the Annual Governance Statement

We must give an opinion on the consistency of the financial and non-financial information in the accounts for the year 2019/20 with the audited financial statements.

We must also review the Annual Governance Statement for completeness of disclosures, consistency with other information from our work, and whether it complies with relevant guidance.

We have concluded that:

- Financial information in the accounts for the year 2019/20 and published with the financial statements was consistent with the audited financial statements.
- The Annual Governance Statement is consistent with other information from our audit of the financial statements.

### Whole of Government Accounts

Alongside our work on the financial statements, we also review and report to the National Audit Office on your Whole of Government Accounts return. The extent of our review, and the nature of our report, is specified by the National Audit Office.

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts (WGA) submission following the completion of the financial statements audit. As noted previously, there are technical issues with the system used by authorities to submit WGA data which need to be resolved before this work can be completed. These issues are impacting a number of authorities and are not specific to Wandsworth Borough Council.

## Other reporting issues

# Other reporting issues

### Other powers and duties

We have a duty under the Local Audit and Accountability Act 2014 to consider whether to report on any matter that comes to our attention in the course of the audit, either for the Authority to consider it or to bring it to the attention of the public (i.e. “a report in the public interest”). We did not identify any issues which required us to issue a report in the public interest.

We also have a duty to make written recommendations to the Authority, copied to the Secretary of State, and take action in accordance with our responsibilities under the Local Audit and Accountability Act 2014. We did not identify any issues.

### Other matters

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

- Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- Any significant difficulties encountered during the audit;
- Any significant matters arising from the audit that were discussed with management;
- Written representations we have requested;
- Expected modifications to the audit report;
- Any other matters significant to overseeing the financial reporting process;
- Findings and issues around the opening balance on initial audits (if applicable);
- Related parties;
- External confirmations;
- Going concern;
- Consideration of laws and regulations; and
- Group audits.

Prior to issuing our audit report, we completed an internal consultation process which resulted in the inclusion of an emphasis of matter paragraph in respect of the material valuation uncertainty related to the Authority’s land, buildings and investment property. As previously noted in this report, we had extensive discussions with management in relation to going concern which resulted in increased disclosures within the financial statements.

We have nothing to report in respect of the remaining items.



07

# Independence

## Confirmation and analysis of Audit fees

We confirm there are no changes in our assessment of independence since our confirmation in our audit planning report dated February 2020. We complied with the APB Ethical Standards. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning of regulatory and professional requirements.

We consider that our independence in this context is a matter that should be reviewed by both you and ourselves. It is therefore important that you and your Audit and Governance Committee consider the facts of which you are aware and come to a view. If you wish to discuss any matters concerning our independence, we will be pleased to do so at the forthcoming meeting of the Audit Committee in March 2021.

Our fees below do not include the scale fee review which is currently underway with PSAA to agree whether the scale fees for Local Government need to be rebased to account for the increased audit and quality requirements as well as increased regulatory challenge on the depth and quality of assurance provided by audit suppliers. There is now greater pressure on firms to deliver higher quality audits by requiring auditors to demonstrate greater professional scepticism when carrying out their work. This has resulted in auditors needing to exercise greater challenge to the areas where management makes judgements or relies upon advisers, for example, in relation to estimates and related assumptions within the accounts. Discussions with PSAA remain ongoing.

	Final Fee 2019/20	Planned Fee 2019/20	Final Fee 2018/19
	£	£	£
Scale Fee – Code work	91,559*	91,559*	86,559
Additional procedures – Code work	TBC*	TBC*	0
Non-audit work – Grant claims:			
– base fee	9,331	9,331	8,483
– 40+ testing arising due to errors identified	TBC**	TBC**	18,512
Total	TBC**	TBC**	26,995
Total fees	TBC	TBC	113,554

## Confirmation and analysis of Audit fees (continued)



The final fee for our Code work will be confirmed upon completion of the audit. We will report the final fee in relation to the audit to the Audit, Standards and Statutory Accounts Committee in our Annual Audit Letter. For 2019/20, the final fee has been impacted by a range of factors which has resulted in additional work. We set out an estimate of the potential additional fee for this below which we will discuss in detail with the Director of Resources and Deputy Chief Executive and will be subject to approval by PSAA:

- Additional work related to group accounts;
- The need to engage EY Real Estate to review a sample of valuations of investment properties and EUV assets, 17 assets in total;
- Review of additional disclosures that were required in relation to going concern; and,
- Consultation requirements concerning the impact on the auditor's report from the land and building valuations material uncertainty clause and going concern assessment and disclosures.

\*\*We have been contracted to undertake agreed upon procedures (AuP) by the Authority in order to certify the housing benefit subsidy claim. We are not due to undertake these AuP until November 2020. The final fee charged for this work will be dependent upon the level of error and additional testing we are required to undertake in response. This level of work varies year on year and we cannot provide a reliable estimate at this stage.

## Relationships, services and related threats and safeguards



The FRC Ethical Standard requires that we provide details of all relationships between Ernst & Young (EY) and your Authority, senior management and its affiliates, including all services provided by us and our network to your Authority, senior management and its affiliates, and other services provided to other known connected parties that we consider may reasonably be thought to bear on the our integrity or objectivity, including those that could compromise independence and the related safeguards that are in place and why they address the threats.

There are no relationships from 1 April 2019 to the date of this report, which we consider may reasonably be thought to bear on our independence and objectivity.

### Services provided by Ernst & Young

On the previous slides, we have included a summary of the fees that are due to us in relation to the year ended 31 March 2020 in line with the disclosures set out in FRC Ethical Standard and in statute. Full details of the services that we have provided and the related threats and safeguards are included in the slides above.

This includes our certification of the Authority's Housing Benefit claim, the fee for which is reported on the previous slide.

We confirm that none of the services listed has been provided on a contingent fee basis.

As at the date of this report, there are no future services which have been contracted and no written proposal to provide non-audit services has been submitted.

## New UK Independence Standards

The Financial Reporting Council (FRC) published the Revised Ethical Standard 2019 in December and it will apply to accounting periods starting on or after 15 March 2020. A key change in the new Ethical Standard will be a general prohibition on the provision of non-audit services by the auditor (and its network) which will apply to UK Public Interest Entities (PIEs). A narrow list of permitted services will continue to be allowed.

### Summary of key changes

- Extraterritorial application of the FRC Ethical Standard to UK PIE and its worldwide affiliates
- A general prohibition on the provision of non-audit services by the auditor (or its network) to a UK PIE, its UK parent and worldwide subsidiaries
- A narrow list of permitted services where closely related to the audit and/or required by law or regulation
- Absolute prohibition on the following relationships applicable to UK PIE and its affiliates including material significant investees/investors:
  - Tax advocacy services
  - Remuneration advisory services
  - Internal audit services
  - Secondment/loan staff arrangements
- An absolute prohibition on contingent fees.
- Requirement to meet the higher standard for business relationships i.e. business relationships between the audit firm and the audit client will only be permitted if it is inconsequential.
- Permitted services required by law or regulation will not be subject to the 70% fee cap.
- Grandfathering will apply for otherwise prohibited non-audit services that are open at 15 March 2020 such that the engagement may continue until completed in accordance with the original engagement terms.
- A requirement for the auditor to notify the Audit Committee where the audit fee might compromise perceived independence and the appropriate safeguards.
- A requirement to report to the Audit Committee details of any breaches of the Ethical Standard and any actions taken by the firm to address any threats to independence. A requirement for non-network component firm whose work is used in the group audit engagement to comply with the same independence standard as the group auditor. Our current understanding is that the requirement to follow UK independence rules is limited to the component firm issuing the audit report and not to its network. This is subject to clarification with the FRC.

### Next Steps

We will continue to monitor and assess all ongoing and proposed non-audit services and relationships to ensure they are permitted under FRC Revised Ethical Standard 2016 which will continue to apply until 31 March 2020 as well as the recently released FRC Revised Ethical Standard 2019 which will be effective from 1 April 2020. We will work with you to ensure orderly completion of the services or where required, transition to another service provider within mutually agreed timescales.

We do not provide any non-audit services which would be prohibited under the new standard.

## Other communications

### EY Transparency Report 2020

Ernst & Young (EY) has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained.

Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the year end 30 June 2020:

[https://www.ey.com/en\\_uk/who-we-are/transparency-report-2020](https://www.ey.com/en_uk/who-we-are/transparency-report-2020)



# 08 Appendices

## Appendix A

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# Audit approach update

We summarise below our approach to the audit of the balance sheet and any changes to this approach from the prior year audit.

Our audit procedures are designed to be responsive to our assessed risk of material misstatement at the relevant assertion level. Assertions relevant to the balance sheet include:

- Existence: An asset, liability and equity interest exists at a given date
- Rights and Obligations: An asset, liability and equity interest pertains to the entity at a given date
- Completeness: There are no unrecorded assets, liabilities, and equity interests, transactions or events, or undisclosed items
- Valuation: An asset, liability and equity interest is recorded at an appropriate amount and any resulting valuation or allocation adjustments are appropriately recorded
- Presentation and Disclosure: Assets, liabilities and equity interests are appropriately aggregated or disaggregated, and classified, described and disclosed in accordance with the applicable financial reporting framework. Disclosures are relevant and understandable in the context of the applicable financial reporting framework

There were no significant changes to our audit approach from the prior year.

## Appendix B

# Summary of communications

Date 	Nature 	Summary 
Throughout the year	Meetings, calls and emails.	The Senior Manager has been in regular contact with the Director of Resources and Deputy Chief Executive and the corporate finance team in respect of the Fund's risks, accounts closedown and the audit approach.
Once per month	Meeting	The Senior Manager and Associate Partner have met regularly with the Director of Resources and Deputy Chief Executive on a monthly basis throughout the year to discuss audit and Fund matters up to the date of issue of this report.
6 November 2019 16 March 2020 30 September 2020 11 November 2020	Audit Committee	The Associate Partner and/or Senior Manager have attended those meetings of the Audit Committee noted opposite through the financial year and to the date of issue of this report. Specific reports issued and communications with the Committee are detailed in Appendix C.

In addition to the above specific meetings and letters the audit team met with the management team multiple times throughout the audit to discuss audit findings.

## Appendix C

# Required communications with the Audit Committee

There are certain communications that we must provide to the Audit Committees of UK clients. We have detailed these here together with a reference of when and where they were covered:

 Our Reporting to you		
Required communications	 What is reported?	  When and where
Terms of engagement	Confirmation by the Audit Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies.
Our responsibilities	Reminder of our responsibilities as set out in the engagement letter.	Audit planning report – March 2020 Audit Committee.
Planning and audit approach	Communication of the planned scope and timing of the audit, any limitations and the significant risks identified.	Audit planning report – March 2020 Audit Committee. Audit Plan Update – August 2020.
Significant findings from the audit	<ul style="list-style-type: none"> <li>• Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>• Significant difficulties, if any, encountered during the audit</li> <li>• Significant matters, if any, arising from the audit that were discussed with management</li> <li>• Written representations that we are seeking</li> <li>• Expected modifications to the audit report</li> <li>• Other matters if any, significant to the oversight of the financial reporting process</li> </ul>	Audit results report – November 2020 Audit Committee.

# Appendix C

		 Our Reporting to you
Required communications	 What is reported?	  When and where
Public Interest Entities	<p>For the audits of financial statements of public interest entities our written communications to the Audit Committee include:</p> <ul style="list-style-type: none"> <li>• A declaration of independence</li> <li>• The identity of each key audit partner</li> <li>• The use of non-member firms or external specialists and confirmation of their independence</li> <li>• The nature and frequency of communications</li> <li>• A description of the scope and timing of the audit</li> <li>• Which categories of the balance sheet have been tested substantively or controls based and explanations for significant changes to the prior year, including first year audits</li> <li>• Materiality</li> <li>• Any going concern issues identified</li> <li>• Any significant deficiencies in internal control identified and whether they have been resolved by management</li> <li>• Subject to compliance with regulations, any actual or suspected non-compliance with laws and regulations identified relevant to the Audit Committee</li> <li>• Subject to compliance with regulations, any suspicions that irregularities, including fraud with regard to the financial statements, may occur or have occurred, and the implications thereof</li> <li>• The valuation methods used and any changes to these including first year audits</li> <li>• The scope of consolidation and exclusion criteria if any and whether in accordance with the reporting framework</li> <li>• The identification of any non-EY component teams used in the group audit</li> <li>• The completeness of documentation and explanations received</li> <li>• Any significant difficulties encountered in the course of the audit</li> <li>• Any significant matters discussed with management</li> <li>• Any other matters considered significant</li> </ul>	<p>Audit planning report – March 2020 Audit Committee.            Audit Plan Update – August 2020.            Audit results report – November 2020 Audit Committee.</p>

# Appendix C

		Our Reporting to you
Required communications	What is reported?	When and where
Going concern	<p>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</p> <ul style="list-style-type: none"> <li>• Whether the events or conditions constitute a material uncertainty</li> <li>• Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>• The adequacy of related disclosures in the financial statements</li> </ul>	Audit results report – November 2020 Audit Committee.
Misstatements	<ul style="list-style-type: none"> <li>• Uncorrected misstatements and their effect on our audit opinion</li> <li>• The effect of uncorrected misstatements related to prior periods</li> <li>• A request that any uncorrected misstatement be corrected</li> <li>• Material misstatements corrected by management</li> </ul>	Audit results report – November 2020 Audit Committee.
Subsequent events	<ul style="list-style-type: none"> <li>• Enquiry of the Audit Committee where appropriate regarding whether any subsequent events have occurred that might affect the financial statements.</li> </ul>	Audit results report – November 2020 Audit Committee.
Fraud	<ul style="list-style-type: none"> <li>• Enquiries of the Audit Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the Authority</li> <li>• Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</li> <li>• Unless all of those charged with governance are involved in managing the Authority, any identified or suspected fraud involving:               <ol style="list-style-type: none"> <li>a. Management;</li> <li>b. Employees who have significant roles in internal control; or</li> <li>c. Others where the fraud results in a material misstatement in the financial statements.</li> </ol> </li> <li>• The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</li> <li>• Any other matters related to fraud, relevant to Audit Committee responsibility.</li> </ul>	Audit results report – November 2020 Audit Committee.

# Appendix C

		Our Reporting to you
Required communications	What is reported?	When and where
Related parties	<p>Significant matters arising during the audit in connection with the Authority's related parties including, when applicable:</p> <ul style="list-style-type: none"> <li>• Non-disclosure by management</li> <li>• Inappropriate authorisation and approval of transactions</li> <li>• Disagreement over disclosures</li> <li>• Non-compliance with laws and regulations</li> <li>• Difficulty in identifying the party that ultimately controls the Authority</li> </ul>	Audit results report – November 2020 Audit Committee.
Independence	<p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence.</p> <p>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</p> <ul style="list-style-type: none"> <li>• The principal threats</li> <li>• Safeguards adopted and their effectiveness</li> <li>• An overall assessment of threats and safeguards</li> <li>• Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul> <p>Communications whenever significant judgments are made about threats to objectivity and independence and the appropriateness of safeguards put in place.</p>	<p>Audit planning report – March 2020 Audit Committee.</p> <p>Audit Plan Update – August 2020.</p> <p>Audit results report – November 2020 Audit Committee</p>

## Appendix C

		 Our Reporting to you
Required communications	 What is reported?	 When and where
External confirmations	<ul style="list-style-type: none"> <li>Management's refusal for us to request confirmations</li> <li>Inability to obtain relevant and reliable audit evidence from other procedures.</li> </ul>	Audit results report – November 2020 Audit Committee
Consideration of laws and regulations	<ul style="list-style-type: none"> <li>Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur</li> <li>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</li> </ul>	We have asked management and those charged with governance. We have not identified any material instances or non-compliance with laws and regulations.
Significant deficiencies in internal controls identified during the audit	<ul style="list-style-type: none"> <li>Significant deficiencies in internal controls identified during the audit.</li> </ul>	Audit results report – November 2020 Audit Committee

## Appendix C

		Our Reporting to you
Required communications	 What is reported?	  When and where
Group Audits	<ul style="list-style-type: none"> <li>• An overview of the type of work to be performed on the financial information of the components</li> <li>• An overview of the nature of the group audit team's planned involvement in the work to be performed by the component auditors on the financial information of significant components</li> <li>• Instances where the group audit team's evaluation of the work of a component auditor gave rise to a concern about the quality of that auditor's work</li> <li>• Any limitations on the group audit, for example, where the group engagement team's access to information may have been restricted</li> <li>• Fraud or suspected fraud involving group management, component management, employees who have significant roles in group-wide controls or others where the fraud resulted in a material misstatement of the group financial statements.</li> </ul>	Audit planning report – March 2020 Audit Committee. Audit Plan Update – August 2020. Audit results report – October 2020 Audit Committee
Written representations we are requesting from management and/or those charged with governance	<ul style="list-style-type: none"> <li>• Written representations we are requesting from management and/or those charged with governance</li> </ul>	Audit results report – October 2020 Audit Committee
Material inconsistencies or misstatements of fact identified in other information which management has refused to revise	<ul style="list-style-type: none"> <li>• Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</li> </ul>	Audit results report – October 2020 Audit Committee
Auditors report	<ul style="list-style-type: none"> <li>• Any circumstances identified that affect the form and content of our auditor's report</li> </ul>	Audit results report – October 2020 Audit Committee
Fee Reporting	<ul style="list-style-type: none"> <li>• Breakdown of fee information when the audit planning report is agreed</li> <li>• Breakdown of fee information at the completion of the audit</li> <li>• Any non-audit work</li> </ul>	Audit planning report – March 2020 Audit Committee. Audit Plan Update – August 2020. Audit results report – October 2020 Audit Committee

# Management representation letter

## Management Rep Letter

[To be prepared on the entity's letterhead]

[Date]

Helen Thompson  
Ernst & Young LLP  
Grosvenor House,  
Grosvenor Square,  
Southampton  
SO15 2BE,

This letter of representations is provided in connection with your audit of the consolidated and council financial statements of Wandsworth Borough Council ("the Group and Council") for the year ended 31 March 2020. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the consolidated and council financial statements give a true and fair view of the Group and Council financial position of Wandsworth Borough Council as of 31 March 2020 and of its financial performance (or operations) and its cash flows for the year then ended in accordance with, for the Group and Council, CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

We understand that the purpose of your audit of our consolidated and council financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing, which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

### A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with, for the Group and Council the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

2. We acknowledge, as members of management of the Group and Council, our responsibility for the fair presentation of the consolidated and council financial statements. We believe the consolidated and council financial statements referred to above give a true and fair view of the financial position, financial performance (or results of operations) and cash flows of the Group and Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 and are free of material misstatements, including omissions. We have approved the consolidated and Council financial statements.

3. The significant accounting policies adopted in the preparation of the Group and Council financial statements are appropriately described in the Group and Council financial statements.

4. As members of management of the Group and Council, we believe that the Group and Council have a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20 for the Group and Council that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls.

5. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and

# Management representation letter

## Management Rep Letter

in the aggregate, to the consolidated and council financial statements taken as a whole. We have not corrected these differences identified and brought to our attention by the auditor because they represent immaterial differences in judgmental opinions between the Council's appointed valuers and the Ernst & Young Real Estate professionals.

### B. Non-compliance with law and regulations, including fraud

1. We acknowledge that we are responsible for determining that the Group and Council's activities are conducted in accordance with laws and regulations and that we are responsible for identifying and addressing any non-compliance with applicable laws and regulations, including fraud.

2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.

3. We have disclosed to you the results of our assessment of the risk that the consolidated and Council financial statements may be materially misstated as a result of fraud.

4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Group or Council (regardless of the source or form and including without limitation, any allegations by "whistleblowers"), including non-compliance matters:

- involving financial statements;
- related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the consolidated or Council's financial statements;
- related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Group or Council's activities, its ability to continue to operate, or to avoid material penalties;
- involving management, or employees who have significant roles in internal controls, or others; or
- in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

### C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:

- Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- Additional information that you have requested from us for the purpose of the audit; and
- Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.

2. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the consolidated and council financial statements, including those related to the COVID-19 pandemic. We have made available to you all minutes of the meetings of the Group, and committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year to the most recent meeting on the following date: [list date] and of the Council, and committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year to the most recent meeting on the following date: [list date].

3. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Group and Council's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the year ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the consolidated and council financial statements.

4. We believe that the significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.

# Management representation letter

## Management Rep Letter

5. We have disclosed to you, and the Group and Council has complied with, all aspects of contractual agreements that could have a material effect on the consolidated and council financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.

6. From the date of our last management representation letter dated 31 July 2019 through the date of this letter we have disclosed to you any unauthorised access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants), to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material impact to the financial statements, in each case or in the aggregate

### D. Liabilities and Contingencies

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the consolidated and council financial statements.

2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.

3. We have recorded and/or disclosed, as appropriate, all liabilities related to litigation and claims, both actual and contingent, and have disclosed in Note 45 to the consolidated and council financial statements all guarantees that we have given to third parties.

### E. Subsequent Events

1. There have been no subsequent events, including events related to the COVID-19 pandemic, subsequent to year end which require adjustment of or disclosure in the consolidated and council financial statements or notes thereto.

### F. Group audits

1. Necessary adjustments have been made to eliminate all material intra-group transactions amongst council and its subsidiary undertakings.

### G. Other information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises Narrative Statement and Annual Governance Statement.

2. We confirm that the content contained within the other information is consistent with the financial statements.

### H. Going Concern

1. Note 1.2 to the consolidated and Council financial statements discloses all the matters of which we are aware that are relevant to the Group and Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

### I. Ownership of Assets

1. Except for assets recognised as right-of-use assets in accordance with IFRS 16 Leases, the Group and Council has satisfactory title to all assets appearing in the balance sheet(s), and there are no liens or encumbrances on the Group and Council's assets, nor has any asset been pledged as collateral. All assets to which the Group and Council has satisfactory title appear in the balance sheet.

### J. Reserves

1. We have properly recorded or disclosed in the consolidated and Council financial statements the useable and unusable reserves.

# Management representation letter

## Management Rep Letter

### K. Contingent Liabilities

We are unaware of any violations or possible violations of laws or regulations the effects of which should be considered for disclosure in the consolidated and council financial statements or as the basis of recording a contingent loss (other than those disclosed or accrued in the consolidated and council financial statements).

We are unaware of any known or probable instances of non-compliance with the requirements of regulatory or governmental authorities, including their financial reporting requirements, and there have been no communications from regulatory agencies or government representatives concerning investigations or allegations of non-compliance, except as follows:

(1) Matters of routine, normal, recurring nature (e.g., examinations by bank and insurance examiners and examinations by taxing authorities none of which involves any allegations of non-compliance with laws or regulations that should be considered for disclosure in the consolidated and council financial statements or as a basis for recording a loss contingency.

### L. Use of the Work of a Specialist

1. We agree with the findings of the specialists that we engaged to evaluate the valuation of land, buildings, council dwellings and investment properties and pension liabilities and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the consolidated and council financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.

### M. Estimates

Valuation of Land, Buildings, Council Dwellings and Investment Properties Estimate

1. We believe that the measurement processes, including related assumptions and models, used to determine the accounting estimate has been consistently applied and are appropriate in the context of CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.
2. We confirm that the significant assumptions used in making the valuation of land, buildings, council dwellings and investment properties estimate appropriately reflect our intent and ability to provide a valuation for these assets in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

### IAS 19 Pensions Liability Estimate

1. We believe that the measurement processes, including related assumptions and models, used to determine the accounting estimate has been consistently applied and are appropriate in the context of CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.
2. We confirm that the significant assumptions used in making the IAS 19 Pensions Liability estimate appropriately reflect our intent and ability to provide a valuation for these assets in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.
3. We confirm that the disclosures made in the consolidated and Council financial statements with respect to the accounting estimates is complete, including the effects of the COVID-19 pandemic on the valuation and made in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2019/20.

# Management representation letter

## Management Rep Letter

4. We confirm that no adjustments are required to the accounting estimates and disclosures in the consolidated and Council financial statements due to subsequent events.

### N. Retirement benefits

1. On the basis of the process established by us and having made appropriate enquiries, we are satisfied that the actuarial assumptions underlying the scheme liabilities are consistent with our knowledge of the business. All significant retirement benefits and all settlements and curtailments have been identified and properly accounted for.

Yours faithfully,

\_\_\_\_\_  
(Director of Resources and Deputy Chief Executive)

\_\_\_\_\_  
(Chairman of the Audit Committee)

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