



*cutting through complexity*

# Report to those charged with governance (ISA 260) 2014/15

Amber Valley Borough Council

September 2015

**The contacts at KPMG in connection with this report are:**

**Sue Sunderland**

*Director*

*KPMG LLP (UK)*

Tel: 0115 945 4490

Sue.Sunderland@kpmg.co.uk

**Lee Towers**

*Manager*

*KPMG LLP (UK)*

Tel: 0115 935 3428

Lee.Towers@kpmg.co.uk

**David Schofield**

*Assistant Manager*

*KPMG LLP (UK)*

Tel: 0116 256 6074

David.Schofield@kpmg.co.uk

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This report is addressed to the Authority and has been prepared for the sole use of the Authority. We take no responsibility to any member of staff acting in their individual capacities, or to third parties. The Audit Commission issued a document entitled Statement of Responsibilities of Auditors and Audited Bodies summarising where the responsibilities of auditors begin and end and what is expected from audited bodies. We draw your attention to this document which is available on Public Sector Audit Appointment's website ([www.psa.co.uk](http://www.psa.co.uk)).

External auditors do not act as a substitute for the audited body's own responsibility for putting in place proper arrangements to ensure that public business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

We are committed to providing you with a high quality service. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact Sue Sunderland, the engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with your response please contact the national lead partner for all of KPMG's work under our contract with Public Sector Audit Appointments Limited, Trevor Rees (on 0161 246 4000, or by email to [trevor.rees@kpmg.co.uk](mailto:trevor.rees@kpmg.co.uk)). After this, if you are still dissatisfied with how your complaint has been handled you can access PSAA's complaints procedure by emailing [generalenquiries@psaa.co.uk](mailto:generalenquiries@psaa.co.uk), by telephoning 020 7072 7445 or by writing to Public Sector Audit Appointments Limited, 3rd Floor, Local Government House, Smith Square, London, SW1P 3HZ.

## This document summarises:

- the key issues identified during our audit of the financial statements for the year ended 31 March 2015 for the Authority; and
- our assessment of the Authority's arrangements to secure value for money.

## Scope of this report

This report summarises the key findings arising from:

- our audit work at Amber Valley Borough Council ('the Authority') in relation to the Authority's 2014/15 financial statements; and
- the work to support our 2014/15 conclusion on the Authority's arrangements to secure economy, efficiency and effectiveness in its use of resources ('VFM conclusion').

## Financial statements

Our *External Audit Plan 2014/15*, presented to you in January 2015, set out the four stages of our financial statements audit process.



This report focuses on the third stage of the process: substantive procedures. Our on site work for this took place during June and July 2015.

We are now in the final phase of the audit, the completion stage. Some aspects of this stage are also discharged through this report.

## VFM conclusion

Our *External Audit Plan 2014/15* explained our risk-based approach to VFM work. We have now completed the work to support our 2014/15 VFM conclusion. This included:

- assessing the potential VFM risks and identifying the residual audit risks for our VFM conclusion;

- considering the results of any relevant work by the Authority and other inspectorates and review agencies in relation to these risk areas; and
- carrying out additional risk-based work.

## Structure of this report

This report is structured as follows:

- Section 2 summarises the headline messages.
- Section 3 sets out our key findings from our audit work in relation to the 2014/15 financial statements of the Authority.
- Section 4 outlines our key findings from our work on the VFM conclusion.

There is one recommendation included in this report in respect of the 2014/15 year – this is included in Appendix 1. We have also reviewed your progress in implementing prior recommendations and this is detailed in Appendix 2. One recommendation was not fully implemented and has been carried forward into 2014/15.

## Acknowledgements

We would like to take this opportunity to thank officers and Members for their continuing help and co-operation throughout our audit work.

**This table summarises the headline messages for the Authority. The remainder of this report provides further details on each area.**

<b>Proposed audit opinion</b>	<p>We anticipate issuing an unqualified audit opinion on the Authority's financial statements by 30 September 2015. We will also report that your Annual Governance Statement complies with guidance issued by CIPFA/SOLACE in June 2007.</p>
<b>Audit adjustments</b>	<p>We are pleased to report that our audit of your financial statements has not identified any adjustments above our reporting threshold. We have agreed minor presentational changes to the accounts with Finance.</p> <p>Overall, the quality of the financial statements was good and we would like to thank the finance team for their hard work in producing the accounts.</p>
<b>Key financial statements audit risks</b>	<p>We review risks to the financial statements on an ongoing basis. We identified no significant risks specific to the Authority at the planning stage and no additional risks were identified during our 2014/15 audit work.</p>
<b>Accounts production and audit process</b>	<p>Amber Valley Borough Council has processes in place for the production of the accounts and good quality supporting working papers. Officers dealt efficiently with audit queries and the audit process has been completed within the planned timescales.</p> <p>The exception was that the Whole of Government Accounts pack was not submitted to DCLG by the pre-audit deadline on 10 July and was not available for review during our on-site accounts visit.</p> <p>We have worked with Officers throughout the year to discuss issues as they arise.</p>
<b>Completion</b>	<p>At the date of this report our audit of the financial statements is substantially complete. Before we can issue our opinion we require a signed management representation letter.</p> <p>We confirm that we have complied with requirements on objectivity and independence in relation to this year's audit of the Authority's financial statements.</p>
<b>VFM conclusion and risk areas</b>	<p>We have concluded that the Authority has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources. We therefore anticipate issuing an unqualified VFM conclusion by 30 September 2015.</p> <p>Our audit plan identified the achievement of savings plans as a key VFM risk. We have therefore considered this issue in section 4 of this document which details our work on the VFM conclusion.</p> <p>Moving forward, budget monitoring and regular monitoring and reporting of the savings plans (Budget Reduction Action Plans) remain fundamental to the continued financial resilience of the Authority.</p>



**We have not identified any issues in the course of the audit that are considered to be material.**

**We anticipate issuing an unqualified audit opinion in relation to the Authority's financial statements by 30 September 2015.**

**The wording of your Annual Governance Statement complies with guidance issued by CIPFA/SOLACE in June 2007.**

#### Proposed audit opinion

We anticipate issuing an unqualified audit opinion by 30 September 2015 following approval of the Statement of Accounts by the Council on 16 September.

#### Audit differences

In accordance with ISA 260 we are required to report uncorrected audit differences to you. We also report any material misstatements which have been corrected and which we believe should be communicated to you to help you meet your governance responsibilities.

We did not identify any material misstatements.

We identified a small number of presentational adjustments required to ensure that the accounts are compliant with the *Code of Practice on Local Authority Accounting the United Kingdom 2014/15 ('the Code')*. We understand that the Authority has addressed these issues.

#### Annual Governance Statement

We have reviewed the Annual Governance Statement and confirmed that:

- it complies with *Delivering Good Governance in Local Government: A Framework* published by CIPFA/SOLACE; and
- it is not misleading or inconsistent with other information we are aware of from our audit of the financial statements.

**We have worked with the Council throughout the year to discuss significant risks and key areas of audit focus**

**This section sets out our detailed findings on those risks.**



In our External Audit Plan 2014/15, presented to you in February 2015, we did not identify any significant risks affecting the Council's 2014/15 financial statements.

We did however, identify two areas of audit focus. We have now completed our testing of these areas and set out our evaluation following our substantive work. The table below sets out our detailed findings.

Significant audit risk	Issue raised	Findings
<p>Timely delivery of WGA and AGS</p>	<p><b>Risk</b></p> <p>Failure to ensure the timely delivery of the Whole of Government Accounts (WGA) pack and the Annual Governance Statement (AGS) may place the audit opinion deadline at risk. This is an area of audit focus.</p> <p><b>Our audit work</b></p> <p>We will communicate with Financial Services staff throughout the audit process for producing these documents and highlight any risks for late delivery.</p>	<p>The Annual Governance Statement was delivered to the required timescales. We reviewed document and identified no issues of concern.</p> <p>The Whole of Government Accounts pack again missed the pre-audit deadline of 10 July to DCLG. The pack was submitted on 10 August 2015. Whilst this is unlikely to impact on our audit opinion, the Council should keep under review its internal processes and procedures with a view to meeting DCLG deadlines in future.</p>
<p>SERCOP</p>	<p><b>Risk</b></p> <p>The accounts format are not presented in the SERCOP format as required by the CIPFA code. This is an area of audit focus.</p> <p><b>Our audit work</b></p> <p>We will communicate with Financial Services staff throughout the audit process for producing these documents and highlight any risks for late delivery.</p>	<p>We reviewed the processes for coding items to the ledger and checked that these ledger codes had been mapped to the appropriate SERCOP accounts heading. There were no issues of concern.</p>

In our *External Audit Plan 2014/15* we reported that we would consider two risk areas that are specifically required by professional standards and report our findings to you. These risk areas were Management override of controls and the Fraud risk of revenue recognition.

The table below sets out the outcome of our audit procedures and assessment on these risk areas.

Areas of significant risk	Summary of findings
 <p>Management override of controls</p> <p>Audit areas affected</p> <ul style="list-style-type: none"> <li>All areas</li> </ul>	<p>Our audit methodology incorporates the risk of management override as a default significant risk. Management is typically in a unique position to perpetrate fraud because of its ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We have not identified any specific additional risks of management override relating to this audit.</p> <p>In line with our methodology, we carried out appropriate controls testing and substantive procedures, including over journal entries, accounting estimates and significant transactions that are outside the normal course of business, or are otherwise unusual.</p> <p>There are no matters arising from this work that we need to bring to your attention.</p>
 <p>Fraud risk of revenue recognition</p> <p>Audit areas affected</p> <ul style="list-style-type: none"> <li>None</li> </ul>	<p>Professional standards require us to make a rebuttable presumption that the fraud risk from revenue recognition is a significant risk.</p> <p>In our <i>External Audit Plan 2014/15</i> we reported that we do not consider this to be a significant risk for Local Authorities as there is unlikely to be an incentive to fraudulently recognise revenue.</p> <p>This is still the case. Since we have rebutted this presumed risk, there has been no impact on our audit work.</p>

## Financial Statements (continued)

### Accounts production and audit process

The Authority has good processes in place for the production of the accounts and good quality supporting working papers.

Officers dealt efficiently with audit queries and the audit process could be completed within the planned timescales.

#### Accounts production and audit process

ISA 260 requires us to communicate to you our views about the significant qualitative aspects of the Authority's accounting practices and financial reporting. We also assessed the Authority's process for preparing the accounts and its support for an efficient audit.

We considered the following criteria:

Element	Commentary
<b>Accounting practices and financial reporting</b>	The Authority continues to maintain a good financial reporting process and produce statements of accounts to a good standard.  We consider that accounting practices are appropriate.
<b>Completeness of draft accounts</b>	We received a complete set of draft accounts on 30 June 2015.  The Authority have made a small number of presentational changes to the accounts presented for audit however there have been no changes which we consider to be fundamental.
<b>Quality of supporting working papers</b>	Our <i>Accounts Audit Protocol</i> , which we issued in March 2015 and discussed with David Fox, set out our working paper requirements for the audit.  The quality of working papers provided met the standards specified in our <i>Accounts Audit Protocol</i> .
<b>Response to audit queries</b>	Officers dealt efficiently with audit queries in a reasonable time.

#### Findings in respect of the control environment for key financial systems

Where we have determined that this is the most efficient audit approach to take, we test selected controls that address key risks within the financial systems. The strength of the control framework informs the substantive testing we complete during our final accounts visit.

Arrangements are generally sound and we have no specific recommendations to make on the existing arrangements.

#### Prior year recommendations

As part of our audit we specifically follow up the Authority's progress in addressing the recommendations in last year's ISA 260 report. These have been summarised at Appendix 1. We were required to follow these recommendations up as part of our 2014/15 audit and we are pleased to report that with the exception of one recommendation in respect of the WGA return, these recommendations have been successfully implemented.



**We confirm that we have complied with requirements on objectivity and independence in relation to this year's audit of the Authority's financial statements.**

**Before we can issue our opinion we require a signed management representation letter.**

**Once we have finalised our opinions and conclusions we will prepare our *Annual Audit Letter* and close our audit.**

#### **Declaration of independence and objectivity**

As part of the finalisation process we are required to provide you with representations concerning our independence.

In relation to the audit of the financial statements of Amber Valley Borough Council for the year ending 31 March 2015, we confirm that there were no relationships between KPMG LLP and Amber Valley Borough Council, its directors and senior management and its affiliates that we consider may reasonably be thought to bear on the objectivity and independence of the audit engagement lead and audit staff. We also confirm that we have complied with Ethical Standards and the Public Sector Audit Appointments Ltd requirements in relation to independence and objectivity.

We have provided a detailed declaration in Appendix 4 in accordance with ISA 260.

#### **Management representations**

You are required to provide us with representations on specific matters such as your financial standing and whether the transactions within the accounts are legal and unaffected by fraud. We have provided a template to the Section 151 Officer. We require a signed copy of your management representations before we issue our audit opinion.

#### **Other matters**

ISA 260 requires us to communicate to you by exception 'audit matters of governance interest that arise from the audit of the financial statements' which include:

- significant difficulties encountered during the audit;
- significant matters arising from the audit that were discussed, or subject to correspondence with management;
- other matters, if arising from the audit that, in the auditor's professional judgment, are significant to the oversight of the financial reporting process; and
- matters specifically required by other auditing standards to be communicated to those charged with governance (e.g. significant deficiencies in internal control; issues relating to fraud, compliance with laws and regulations, subsequent events, non disclosure, related party, public interest reporting, questions/objections, opening balances etc).

There are no other matters which we wish to draw to your attention in addition to those highlighted in this report.

**Our VFM conclusion considers how the Authority secures financial resilience and challenges how it secures economy, efficiency and effectiveness.**

**We have concluded that the Authority has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources.**

### Background

Auditors are required to give their statutory VFM conclusion based on two criteria specified by the Audit Commission. These consider whether the Authority has proper arrangements in place for:

- securing financial resilience: looking at the Authority's financial governance, financial planning and financial control processes; and
- challenging how it secures economy, efficiency and effectiveness: looking at how the Authority is prioritising resources and improving efficiency and productivity.

We follow a risk based approach to target audit effort on the areas of greatest audit risk. We consider the arrangements put in place by the Authority to mitigate these risks and plan our work accordingly.

The key elements of the VFM audit approach are summarised in the diagram below.

### Work completed

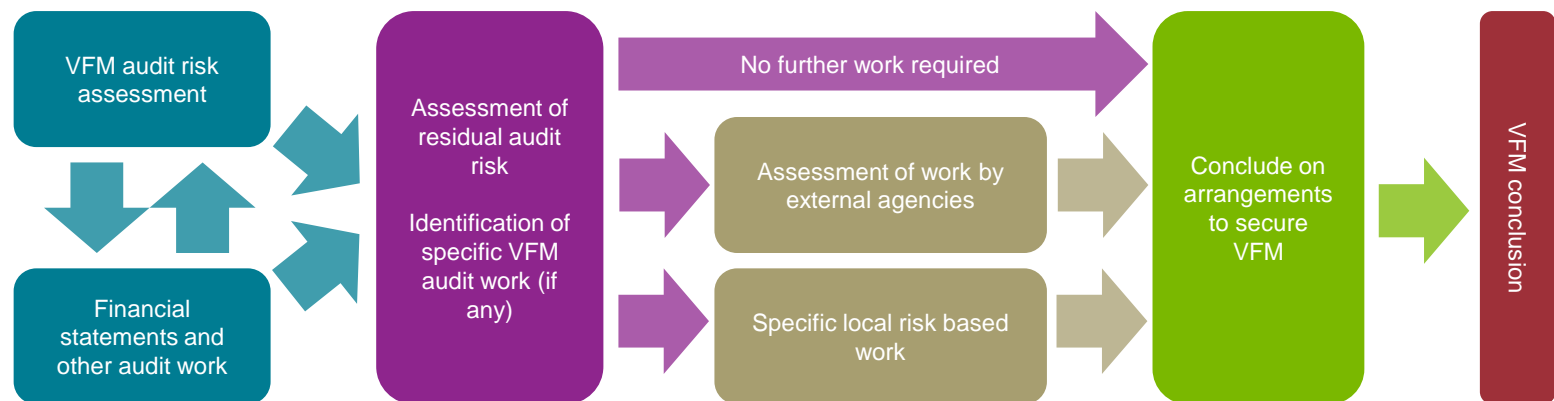
We performed a risk assessment earlier in the year and have reviewed this throughout the year.

The following page includes further details of our VFM risk assessment.

### Conclusion

We have concluded that the Authority has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

VFM criterion	Met
Securing financial resilience	✓
Securing economy, efficiency and effectiveness	✓



We identified a single specific VFM risk.

We are satisfied that internal scrutiny provides sufficient assurance that the Authority's current arrangements in relation to this risk area is adequate.

Moving forward, budget monitoring and regular monitoring and reporting of the savings plans (Budget Reduction Action Plans) remain fundamental to the continued financial resilience of the Authority.

#### Work completed


In line with the risk-based approach set out on the previous page, and in our *External Audit Plan* we have:

- assessed the Authority's key business risks which are relevant to our VFM conclusion;
- identified the residual audit risks for our VFM conclusion, taking account of work undertaken in previous years or as part of our financial statements audit;

- considered the results of relevant work by the Authority, inspectorates and review agencies in relation to these risk areas.

Below we set out the findings in respect of those areas where we have identified an initial audit risk for our VFM conclusion at the planning stage.

Following our detailed risk assessment we concluded that we did not need to carry out additional work as there was sufficient relevant work completed by the Authority.

Key VFM risk	Risk description and link to VFM conclusion	Assessment
	<p>As at December 2014 the Authority is forecasting that it will deliver its 2015/16, 2016/17 and 2017/18 budgets in overall terms and maintain the minimum required level of reserves.</p> <p>In 2014/15 it was originally planned to contribute £248,000 to the General Fund Reserve Reserves, but the Authority is now estimating this to be a contribution of £750,000 which is a result of savings being identified and delivered.</p> <p>The Authority is continuing to review its plans and Budget Reduction Action Plan in order to address the current budget deficit of £1.3 million in 2015/16 onwards which is a result of a reduction in external grant in 2014/15 and 2015/16. The identification of further savings will continue to be challenging as £4 million of savings per annum have already been achieved.</p> <p>This issue is relevant to both the financial resilience and economy, efficiency and effectiveness criteria of the VFM conclusion.</p>	<p>At the 31<sup>st</sup> March 2015 the balance on the General Fund Reserve was just under £6m. This was £1m higher than originally estimated due to additional income from planning applications, business rate grant and trade waste in addition to the £400k transferred from the Operational Reserve following a review of risks.</p> <p>Despite continuing to make ongoing savings (£165k in 2014/15) the drawdown on the General Fund Reserve is estimated to be £1.6million in 2015/16 and it is forecast that budget deficit will continue to increase to £1.7m in 2016/17, £2m in 2017/18 and £2.5m in 2018/19 subject to the details of the Spending Review (2016/17 – 2018/19). The Council forecasts that its reserves could be depleted in 2018/19. Small scale savings continue to be made including £115k resulting from capital investment during 2015/16. However, more significant plans will be needed to address the growing funding gap.</p> <p>The Council has elections again in May 2016 and it is anticipated that a robust budget reduction plan to address the ongoing budget deficit will not be produced until after the elections.</p> <p>Given the financial challenges it is facing, budget monitoring and regular monitoring and reporting of the savings plans (budget reduction action plans) are fundamental to the continued financial resilience of the Authority and timely action must be taken.</p>

## Appendix 1: Key issues and recommendations

We have given the recommendation a risk rating and agreed what action management will need to take.

We will formally follow up the recommendation next year.

We have given each recommendation a risk rating and agreed what action management will need to take.

The Authority should closely monitor progress in addressing specific risks and implementing our recommendations.

Priority rating for recommendations		
<p><b>1</b> <b>Priority one:</b> issues that are fundamental and material to your system of internal control. We believe that these issues might mean that you do not meet a system objective or reduce (mitigate) a risk.</p>	<p><b>2</b> <b>Priority two:</b> issues that have an important effect on internal controls but do not need immediate action. You may still meet a system objective in full or in part or reduce (mitigate) a risk adequately but the weakness remains in the system.</p>	<p><b>3</b> <b>Priority three:</b> issues that would, if corrected, improve the internal control in general but are not vital to the overall system. These are generally issues of best practice that we feel would benefit you if you introduced them.</p>

No.	Risk	Issue and recommendation	Management response / responsible officer / due date
1	<b>1</b>	<p><b>Value for money conclusion</b></p> <p>The Authority continues to review its financial and Budget Reduction Action Plan in order to address the ongoing reductions in government grant.</p> <p>Robust financial planning and regular budget monitoring including the agreement and implementation of savings plans must continue to be given high priority. The identification of further savings is imperative and this will be more challenging in the future as the options for further savings become more difficult to identify.</p> <p>Timely action must be taken as significant plans are needed to address the growing funding gap to ensure the continued financial resilience of the Authority.</p> <p><b>Recommendation</b></p> <p>The Council should refresh the MTFs as part of the upcoming budget setting process including agreeing robust savings plans to maintain the ongoing financial stability of the Authority.</p>	<p>Budget information will be provided to the Conservative and Labour Groups during the Autumn of 2015 in order to enable them to produce their individual plans so that they are ready for implementation after the Borough elections in May 2016. It is anticipated that a robust budget reduction plan will be in place by 31 July 2016 at the latest to address the budget deficit.</p>

## Appendix 2: Follow up of prior year recommendations

The Authority has implemented all but one of the recommendations in our ISA 260 Report 2013/14.

This appendix summarises the progress made to implement the recommendations identified in our ISA 260 Report 2013/14 and reiterates any recommendations still outstanding.

Number of recommendations that were:	
Included in original reports	8
Implemented in year or superseded	7
Remain outstanding (re-iterated below)	1

No.	Risk	Issue and recommendation	Officer responsible and due date	Status as at August 2015
1	2	<p>The Authority was required to prepare its Whole of Government Accounts (WGA) return by a deadline of 30 June 2014 for submission to Communities and Local Government and should submit to the auditors at the same time. This return was not submitted until 18 August 2014, which delayed our audit work. We were required to report the lateness of the submission to the Audit Commission</p> <p><b>Recommendation</b></p> <p>The WGA should be prepared in conjunction with the accounts and submitted by the specified deadline.</p>	<p><b>2013/14 Management response</b></p> <p>Completion of the return is an onerous process and normally takes around two weeks to complete and cannot be undertaken until after the Accounts have been produced.</p> <p>However officers will in future aim to complete the return as soon as possible after the preparation of the Statutory Accounts but this is unlikely to be complete by 30 June, although every effort will be made to make it available to the Auditors in time for their main visit.</p>	<p>The WGA pack was submitted on 10 August 2015 which missed the pre-audit deadline of 10 July 2015.</p> <p>Given the pressures that earlier deadlines for producing draft accounts will place on the Council from 2017/18, it is important that the Council can meet current deadlines as a demonstration of its readiness to meet these more demanding deadlines going forwards.</p>

**This appendix sets out the audit differences.**

**The financial statements have been amended for all of the errors identified through the audit process.**

**There is no net impact on the General Fund as a result of the amendments.**

We are required by ISA 260 to report all uncorrected misstatements, other than those that we believe are clearly trivial, to those charged with governance (which in the Authority's case is the full Council). We are also required to report all material misstatements that have been corrected but that we believe should be communicated to you to assist you in fulfilling your governance responsibilities.

#### **Uncorrected audit differences**

We are pleased to report that there are no uncorrected audit differences.

#### **Corrected audit differences**

Our audit identified a small number of non material errors in the financial statements. These have been discussed with management and the financial statements have been amended for all of them. A number of minor amendments focused on presentational improvements and these have also been made to the draft financial statements.

**The Code of Audit Practice requires us to exercise our professional judgement and act independently of both Public Sector Audit Appointments Ltd and the Authority.**

### Requirements

Auditors appointed by Public Sector Audit Appointments Ltd must comply with the *Code of Audit Practice* (the 'Code') which states that:

*“Auditors and their staff should exercise their professional judgement and act independently of both the Commission and the audited body. Auditors, or any firm with which an auditor is associated, should not carry out work for an audited body that does not relate directly to the discharge of auditors’ functions, if it would impair the auditors’ independence or might give rise to a reasonable perception that their independence could be impaired.”*

In considering issues of independence and objectivity we consider relevant professional, regulatory and legal requirements and guidance, including the provisions of the Code, the detailed provisions of the Statement of Independence included within the Public Sector Audit Appointments Ltd *Terms of Appointment* ('Public Sector Audit Appointments Ltd Guidance') and the requirements of APB Ethical Standard 1 *Integrity, Objectivity and Independence* ('Ethical Standards').

The Code states that, in carrying out their audit of the financial statements, auditors should comply with auditing standards currently in force, and as may be amended from time to time. Public Sector Audit Appointments Ltd guidance requires appointed auditors to follow the provisions of ISA (UK & I) 260 *Communication of Audit Matters with Those Charged with Governance* that are applicable to the audit of listed companies. This means that the appointed auditor must disclose in writing:

- Details of all relationships between the auditor and the client, its directors and senior management and its affiliates, including all services provided by the audit firm and its network to the client, its directors and senior management and its affiliates, that the auditor considers may reasonably be thought to bear on the auditor's objectivity and independence.

- The related safeguards that are in place.
- The total amount of fees that the auditor and the auditor's network firms have charged to the client and its affiliates for the provision of services during the reporting period, analysed into appropriate categories, for example, statutory audit services, further audit services, tax advisory services and other non-audit services. For each category, the amounts of any future services which have been contracted or where a written proposal has been submitted are separately disclosed. We do this in our *Annual Audit Letter*.

Appointed auditors are also required to confirm in writing that they have complied with Ethical Standards and that, in the auditor's professional judgement, the auditor is independent and the auditor's objectivity is not compromised, or otherwise declare that the auditor has concerns that the auditor's objectivity and independence may be compromised and explaining the actions which necessarily follow from his. These matters should be discussed with the Governance and Audit Board.

Ethical Standards require us to communicate to those charged with governance in writing at least annually all significant facts and matters, including those related to the provision of non-audit services and the safeguards put in place that, in our professional judgement, may reasonably be thought to bear on our independence and the objectivity of the Engagement Lead and the audit team.

### General procedures to safeguard independence and objectivity

KPMG's reputation is built, in great part, upon the conduct of our professionals and their ability to deliver objective and independent advice and opinions. That integrity and objectivity underpins the work that KPMG performs and is important to the regulatory environments in which we operate. All partners and staff have an obligation to maintain the relevant level of required independence and to identify and evaluate circumstances and relationships that may impair that independence.



**The Code of Audit Practice requires us to exercise our professional judgement and act independently of both Public Sector Audit Appointments Ltd and the Authority.**

Acting as an auditor places specific obligations on the firm, partners and staff in order to demonstrate the firm's required independence. KPMG's policies and procedures regarding independence matters are detailed in the *Ethics and Independence Manual* ('the Manual'). The Manual sets out the overriding principles and summarises the policies and regulations which all partners and staff must adhere to in the area of professional conduct and in dealings with clients and others.

KPMG is committed to ensuring that all partners and staff are aware of these principles. To facilitate this, a hard copy of the Manual is provided to everyone annually. The Manual is divided into two parts. Part 1 sets out KPMG's ethics and independence policies which partners and staff must observe both in relation to their personal dealings and in relation to the professional services they provide. Part 2 of the Manual summarises the key risk management policies which partners and staff are required to follow when providing such services.

All partners and staff must understand the personal responsibilities they have towards complying with the policies outlined in the Manual and follow them at all times. To acknowledge understanding of and adherence to the policies set out in the Manual, all partners and staff are required to submit an annual ethics and independence confirmation. Failure to follow these policies can result in disciplinary action.

#### **Auditor declaration**

In relation to the audit of the financial statements of Amber Valley Borough Council for the financial year ending 31 March 2015, we confirm that there were no relationships between KPMG LLP and Amber Valley Borough Council, its directors and senior management and its affiliates that we consider may reasonably be thought to bear on the objectivity and independence of the audit engagement lead and audit staff. We also confirm that we have complied with Ethical Standards and the Public Sector Audit Appointments Ltd requirements in relation to independence and objectivity.



**For 2014/15 our materiality is £1 million for the Authority's accounts.**

**We have reported all audit differences over £50k for the Authority's accounts to the Governance and Audit Board.**

### Materiality

The assessment of what is material is a matter of professional judgment and includes consideration of three aspects: materiality by value, nature and context.

- Material errors by value are those which are simply of significant numerical size to distort the reader's perception of the financial statements. Our assessment of the threshold for this depends upon the size of key figures in the financial statements, as well as other factors such as the level of public interest in the financial statements.
- Errors which are material by nature may not be large in value, but may concern accounting disclosures of key importance and sensitivity, for example the salaries of senior staff.
- Errors that are material by context are those that would alter key figures in the financial statements from one result to another – for example, errors that change successful performance against a target to failure.

We used the same planning materiality reported in our External Audit Plan 2014/15, presented to you in February 2015

Materiality for the Authority's accounts was set at £1 m which equates to around 2% percent of gross expenditure. We design our procedures to detect errors in specific accounts at a lower level of precision.

### Reporting to the Governance and Audit Board

Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Governance and Audit Board any misstatements of lesser amounts to the extent that these are identified by our audit work.

Under ISA 260, we are obliged to report omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. ISA 260 defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.

ISA 450 requires us to request that uncorrected misstatements are corrected.

In the context of the Authority, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £50k for the Authority.

Where management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Governance and Audit Board to assist it in fulfilling its governance responsibilities.

## Appendix 6: KPMG Audit Quality Framework

We continually focus on delivering a high quality audit.

This means building robust quality control procedures into the core audit process rather than bolting them on at the end, and embedding the right attitude and approaches into management and staff.

KPMG's Audit Quality Framework consists of seven key drivers combined with the commitment of each individual in KPMG.

The diagram summarises our approach and each level is expanded upon.

At KPMG we consider audit quality is not just about reaching the right opinion, but how we reach that opinion. KPMG views the outcome of a quality audit as the delivery of an appropriate and independent opinion in compliance with the auditing standards. It is about the processes, thought and integrity behind the audit report. This means, above all, being independent, compliant with our legal and professional requirements, and offering insight and impartial advice to you, our client.

KPMG's Audit Quality Framework consists of seven key drivers combined with the commitment of each individual in KPMG. We use our seven drivers of audit quality to articulate what audit quality means to KPMG.

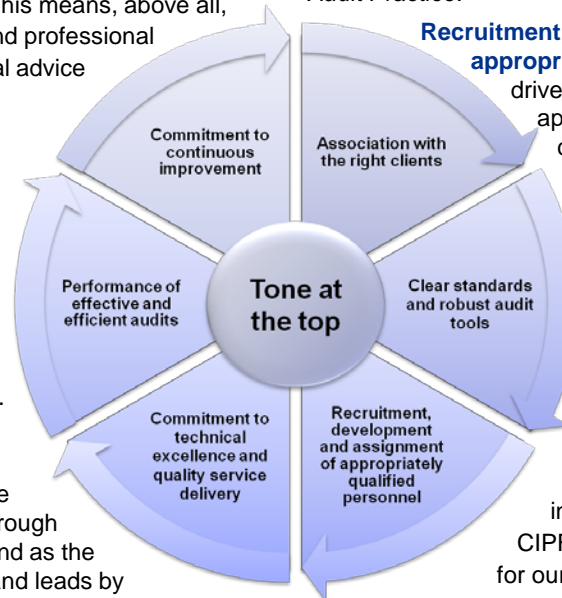
We believe it is important to be transparent about the processes that sit behind a KPMG audit report, so you can have absolute confidence in us and in the quality of our audit.

**Tone at the top:** We make it clear that audit quality is part of our culture and values and therefore non-negotiable. Tone at the top is the umbrella that covers all the drives of quality through a focused and consistent voice. Sue Sunderland as the Engagement Lead sets the tone on the audit and leads by example with a clearly articulated audit strategy and commits a significant proportion of his time throughout the audit directing and supporting the team.

**Association with right clients:** We undertake rigorous client and engagement acceptance and continuance procedures which are vital to the ability of KPMG to provide high-quality professional services to our clients.

**Clear standards and robust audit tools:** We expect our audit professionals to adhere to the clear standards we set and we provide a range of tools to support them in meeting these expectations. The global rollout of KPMG's eAudIT application has significantly enhanced existing audit functionality. eAudIT enables KPMG to deliver a highly

technically enabled audit. All of our staff have a searchable data base, Accounting Research Online, that includes all published accounting standards, the KPMG Audit Manual Guidance as well as other relevant sector specific publications, such as the Audit Commission's *Code of Audit Practice*.



**Recruitment, development and assignment of appropriately qualified personnel:** One of the key drivers of audit quality is assigning professionals appropriate to the Authority's risks. We take great care to assign the right people to the right clients based on a number of factors including their skill set, capacity and relevant experience.

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

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

**We continually focus on delivering a high quality audit.**

**This means building robust quality control procedures into the core audit process rather than bolting them on at the end, and embedding the right attitude and approaches into management and staff.**

**Quality must build on the foundations of well trained staff and a robust methodology.**

### **Commitment to technical excellence and quality service delivery:**

Our professionals bring you up- the-minute and accurate technical solutions and together with our specialists are capable of solving complex audit issues and delivering valued insights.

Our audit team draws upon specialist resources including Forensic, Corporate Finance, Transaction Services, Advisory, Taxation, Actuarial and IT. We promote technical excellence and quality service delivery through training and accreditation, developing business understanding and sector knowledge, investment in technical support, development of specialist networks and effective consultation processes.

**Performance of effective and efficient audits:** We understand that how an audit is conducted is as important as the final result. Our drivers of audit quality maximise the performance of the engagement team during the conduct of every audit. We expect our people to demonstrate certain key behaviors in the performance of effective and efficient audits. The key behaviors that our auditors apply throughout the audit process to deliver effective and efficient audits are outlined below:

- timely Engagement Lead and manager involvement;
- critical assessment of audit evidence;
- exercise of professional judgment and professional scepticism;
- ongoing mentoring and on the job coaching, supervision and review;
- appropriately supported and documented conclusions;
- if relevant, appropriate involvement of the Engagement Quality Control reviewer (EQC review);
- clear reporting of significant findings;
- insightful, open and honest two-way communication with those charged with governance; and
- client confidentiality, information security and data privacy.

**Commitment to continuous improvement:** We employ a broad range of mechanisms to monitor our performance, respond to feedback and understand our opportunities for improvement.

### **Our quality review results**

Public Sector Audit Appointments Ltd publishes information on the quality of work provided by us (and all other firms) for audits undertaken on behalf of them (<http://www.psa.co.uk/audit-quality/principal-audits/kpmg-audit-quality/>).

The latest Annual Regulatory Compliance and Quality Report showed that we are meeting the overall audit quality and regulatory compliance requirements.



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