Fareham Borough Council

Year ending 31 March 2015

Audit Plan

20 April 2015

Ernst & Young LLP







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Private and confidential

Audit and Governance Committee Fareham Borough Council Civic Offices Civic Way Fareham Hampshire PO16 7PU 20 April 2015

Dear Committee Members

Audit Plan

We are pleased to attach our Audit Plan which sets out how we intend to carry out our responsibilities as your auditor. Its purpose is to provide the Audit and Governance Committee with a basis to review our proposed audit approach and scope for the 2014/15 audit in accordance with the requirements of the Audit Commission Act 1998, the Code of Audit Practice, Standing Guidance, auditing standards and other professional requirements. It is also to ensure that our audit is aligned with the Committee's service expectations.

This plan summarises our initial assessment of the key risks driving the development of an effective audit for Fareham Borough Council and outlines our planned audit strategy in response to those risks.

We welcome the opportunity to discuss this plan with you on 29 June 2015 and to understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Kate Handy
For and behalf of Ernst & Young LLP
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Contents

1.	Overview	/	1
2.	The Loca	al Audit and Accountability Act 2014	3
3.	Financia	I statement risks	4
4.	Economy	y, efficiency and effectiveness	6
5.	Our audi	t process and strategy	7
6.	Independ	dence	11
Арј	oendix A	Fees	13
Арі	oendix B	UK required communications with those charged with governance.	14

In March 2010 the Audit Commission issued a revised version of the 'Statement of responsibilities of auditors and audited bodies' (Statement of responsibilities). It is available from the Chief Executive of each audited body and via the <u>Audit Commission's website</u>.

The Statement of responsibilities serves as the formal terms of engagement between the Audit Commission's 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 Standing Guidance serves as our terms of appointment as auditors appointed by the Audit Commission. The Standing Guidance sets out additional requirements that auditors must comply with, over and above those set out in the Code of Audit Practice 2010 (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Annual Plan is prepared in the context of the Statement of responsibilities. It is addressed to the Audit and Governance Committee, and is prepared for the sole use of the audited body. 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 Steve Varley, 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.

1. Overview

Context for the audit

This Audit Plan covers the work that we plan to perform to provide you with:

- Our audit opinion on whether the financial statements of Fareham Borough Council give a true and fair view of the financial position as at 31 March 2015 and of the income and expenditure for the year then ended;
- ► A statutory conclusion on the Council's arrangements to secure economy, efficiency and effectiveness; and

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on your Whole of Government Accounts return.

When planning the audit we take into account several key inputs:

- ▶ Strategic, operational and financial risks relevant to the financial statements;
- Developments in financial reporting and auditing standards;
- ► The quality of systems and processes;
- ▶ Changes in the business and regulatory environment; and
- Management's views on all of the above.

By considering these inputs, our audit is focused on the areas that matter and our feedback is more likely to be relevant to the Council. We have been mindful of and given consideration to the Council's main developments and schemes, including:

- ▶ Welbourne;
- Daedalus Innovation Centre;
- ▶ the Housing Company;
- ▶ the Commercial Property Investment Acquisition Strategy;
- Vanguard; and
- ▶ the capital programme.

None of the above areas have given rise to a significant risk for either the financial statements audit or the Value for Money Conclusion. We will keep our risk assessment under review throughout our audit and communicate to the Audit and Governance Committee any revisions to the identified risks identified and any additional local risk-based work we may need to undertake as a result.

Our audit will also include the mandatory procedures that we are required to perform in accordance with applicable laws and auditing standards.

In sections three and four of this plan we provide more detail on the identified risks and we outline our plans to address them. Our proposed audit process and strategy are summarised below and set out in more detail in section five.

We will provide an update to the Audit and Governance Committee on the results of our work in these areas in our report to those charged with governance scheduled for delivery in September 2015.

Our process and strategy

Financial statement audit and regularity audit

We consider materiality in terms of the possible impact of an error or omission on the financial statements and set an overall planning materiality level. We then set a tolerable error to reduce the probability that the aggregate of uncorrected and undetected misstatements exceeds planning materiality to an appropriately low level. We also assess each disclosure and consider qualitative issues affecting materiality as well as quantitative issues.

We assess the controls in operation in each process affecting the financial statements and consider whether we will rely on internal controls. We expect to rely on internal controls in the benefits, accounts payable and payroll systems. This has been identified as the most efficient approach for your organisation.

To the fullest extent permissible by auditing standards, we will seek to rely on the work of internal audit wherever possible. We will continue to liaise with your internal auditors on this matter.

Arrangements for securing economy, efficiency and effectiveness

Our approach to the value for money (VFM) conclusion for Fareham Borough Council in 2014/15 is based on criteria specified by the Audit Commission relating to whether there are proper arrangements in place within the Council for:

- Securing financial resilience
- ▶ Challenging how the Council secures economy, efficiency and effectiveness.

We adopt an integrated audit approach, so our work on the financial statement audit feeds into our consideration of the arrangements in place for securing economy, efficiency and effectiveness.

One risk area has been identified relating to the acquisition of Daedalus airfield. Further detail is included in section 4 of this Audit Plan.

2. The Local Audit and Accountability Act 2014

The Local Audit and Accountability Act 2014 (the 2014 Act) closes the Audit Commission and repeals the Audit Commission Act 1998.

The 2014 Act requires the Comptroller and Auditor General to prepare a Code of Audit Practice. This must be laid before Parliament and approved before 1 April 2015.

Although this new Code will apply from 1 April 2015, transitional provisions within the 2014 Act provide for the Audit Commission's 2010 Code to continue to apply to audit work in respect of the 2014/15 financial year. This plan is therefore prepared on the basis of the continued application of the 2010 Code of Audit Practice throughout the 2014/15 audit.

3. Financial statement risks

We outline below our assessment of the financial statement risks facing the Council, identified through our knowledge of the Council's operations and discussion with those charged with governance and officers. At our meeting, we will seek to validate these with you.

Significant risks (including fraud risks)

Our audit approach

Risk of management override

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.

Our financial statements audit approach will focus on:

- Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements;
- Reviewing accounting estimates for evidence of management bias, and
- Evaluating the business rationale for significant unusual transactions.

Daedalus airfield valuation

In March 2015, the Council purchased the freehold of the site from the Homes and Communities Agency (HCA). The site includes: commercial property, infrastructure and specialist assets such as the control tower. The valuation of this asset will require careful consideration.

The Council will need to componentise the site and allocate assets between those that are operational and under construction. Operational assets will require valuation for which the Council may require specialist advice.

Our financial statements audit approach will focus on:

- Evaluating the Council's process for allocating individual assets between operational and assets under construction;
- Evaluating the competence and capability of the Council's valuer;
- Considering the data provided to the valuer and evaluating the nature and scope of the valuers work:
- ► Evaluating the appropriateness of the valuers work as a source of audit evidence.

Respective responsibilities in relation to fraud and error

We would like to take this opportunity to remind you that management has the primary responsibility to prevent and detect fraud. It is important that management, with the oversight of those charged with governance, has a culture of ethical behaviour and a strong control environment that both deters and prevents fraud.

Our responsibility is to plan and perform audits to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatements whether caused by error or fraud. As auditors, we approach each engagement with a questioning mind that accepts the possibility that a material misstatement due to fraud could occur, and design the appropriate procedures to consider such risk.

Based on the requirements of auditing standards our approach will focus on:

- Identifying fraud risks during the planning stages;
- ▶ Enquiry of management about risks of fraud and the controls to address those risks;
- ► Understanding the oversight given by those charged with governance of management's processes over fraud;
- Consideration of the effectiveness of management's controls designed to address the risk of fraud;
- ▶ Determining an appropriate strategy to address any identified risks of fraud; and
- Performing mandatory procedures regardless of specifically identified fraud risks.

We will consider the results of the National Fraud Initiative and may refer to it in our reporting to you

4. Economy, efficiency and effectiveness

Our approach to the value for money (VFM) conclusion for Fareham Borough Council for 2014/15 is based on criteria specified by the Audit Commission relating to whether there are proper arrangements in place at the Council for securing:

- 1. Financial resilience, and
- 2. Economy, efficiency and effectiveness in the use of resources.

The Audit Commission VFM guidance for 2014/15 requires that auditors consider and assess the significant risks of giving a wrong conclusion and carry out as much work as is appropriate to enable them to give a safe conclusion on arrangements to secure VFM.

Our assessment of what is a significant risk is a matter of professional judgement, and is based on consideration of both quantitative and qualitative aspects of the subject matter in question.

For those significant risks identified by our risk assessment that are relevant to our VFM conclusion, where these risks will not be addressed by our financial statements audit work or work undertaken by the Council, Audit Commission or other review agency, we consider the need to undertake local VFM work.

The table below provides a high-level summary of our risk assessment and our proposed response to those risks.

Significant risks	Impacts arrangements for securing	Our audit approach
Acquisition of Daedalus airfield		
In March 2015, the Council purchased the freehold of the site from the Homes and Communities Agency (HCA) to facilitate economic development. The Council is now responsible for all operational and financial matters relating to the airfield which it considers viable, although it is projecting short term revenue losses. The Council is planning £10m - £15m capital expenditure to stimulate economic redevelopment on the site. Funding for the capital elements of the project are expected to be a combination of: HCA grant, land sales, prudential borrowing and business rates retention (subject to agreement with the Local Enterprise Partnership). The revenue budget and sources of capital funding are dependent on many assumptions which could have a significant impact on the Council's financial resilience.	Economy, efficiency and effectiveness Financial resilience	 We will focus on: reviewing the evidence to support the assumptions in the Council's long term financial model for the site and considering if it is consistent with the Council's wider budgeting; considering the results of the Council's market analysis study as key to the success of the site will be interest from companies to locate themselves at Daedalus.

5. Our audit process and strategy

5.1 Objective and scope of our audit

Under the Audit Commission's Code of Audit Practice (the 'Code') our principal objectives are to review and report on, the Council's:

- Financial statements
- Arrangements for securing economy, efficiency and effectiveness in its use of resources to the extent required by the relevant legislation and the requirements of the Code.

We issue a two-part audit report covering both of these objectives.

i Financial statement audit

Our objective is to form an opinion on the financial statements under International Standards on Auditing (UK and Ireland).

We will also review and report to the NAO on the Whole of Government Accounts return to the extent and in the form they require.

ii Arrangements for securing economy, efficiency and effectiveness

The Code sets out our responsibility to satisfy ourselves that the Council has proper arrangements to secure economy, efficiency and effectiveness in its use of resources. In arriving at our conclusion, we will rely as far as possible on the reported results of the work of other statutory inspectorates on corporate or service performance.

In examining the Council's corporate performance management and financial management arrangements, we consider the following criteria and areas of focus specified by the Audit Commission:

- Arrangements for securing financial resilience whether the Council has robust systems and processes to manage financial risks and opportunities effectively, and to secure a stable financial position that enables it to continue to operate for the foreseeable future.
- Arrangements for securing economy, efficiency and effectiveness whether the Council
 is prioritising its resources within tighter budgets, for example by achieving cost
 reductions and by improving efficiency and productivity.

5.2 Audit process overview

As part of our audit planning procedures we have assessed the design of your internal controls and determined where it will be most efficient to adopt a controls reliance approach. In those areas we will test the controls we determine as key to preventing and detecting material misstatement.

In implementing this strategy, we intend to rely on the work of internal audit as far as possible, while complying with the requirements of auditing standards. We will review their files and reperform a sample of their work to assess if we can do this.

Processes

Our initial assessment of the key processes across the entity has identified the following key processes where we will seek to test key controls:

Accounts payable

- Payroll
- · Housing Benefits

Analytics

We will use our computer-based analytics tools to enable us to capture whole populations of your financial data, in particular journal entries. These tools:

- Help identify specific exceptions and anomalies which can then be subject to more traditional substantive audit tests
- ▶ Give greater likelihood of identifying errors than random sampling techniques.

We will report the findings from our process and analytics work, including any significant weaknesses or inefficiencies identified and recommendations for improvement, to management and the Audit and Governance Committee.

Internal audit

As in prior years, we will review internal audit plans and the results of their work. We will reflect the findings from these reports, together with reports from any other work completed in the year, in our detailed audit plan, where we raise issues that could have an impact on the year-end financial statements

Use of experts

We will use specialist EY resource, as necessary, to help us to form a view on judgments made in the financial statements. Our plan currently includes involving specialists in pensions.

Mandatory procedures required by auditing standards

As well as the financial statement risks outlined in section three, we must perform other procedures as required by auditing, ethical and independence standards, the Code and other regulations. We outline below the procedures we will undertake during the course of our audit.

Procedures required by standards

- Addressing the risk of fraud and error;
- Significant disclosures included in the financial statements;
- Entity-wide controls;
- ► Reading other information contained in the financial statements and reporting whether it is inconsistent with our understanding and the financial statements; and
- Auditor independence.

Procedures required by the Code

- ► Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Annual Governance Statement;
- ► Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO; and
- Reviewing and examining, where appropriate, evidence relevant to the Council's corporate performance management and financial management arrangements, and its reporting on these arrangements.

5.3 Materiality

For the purposes of determining whether the financial statements are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in aggregate, could reasonably be expected to influence the users of the financial statements. Our evaluation requires professional judgement and so takes into account qualitative as well as quantitative considerations implied in the definition.

We have determined that overall materiality for the financial statements of the Council is £1.17 million based on 2% of gross operating expenditure. This will be reviewed and updated when we receive the draft financial statements in April 2015.

We will communicate uncorrected audit misstatements greater than £58,565 to you.

The amount we consider material at the end of the audit may differ from our initial determination. At this stage, however, it is not feasible to anticipate all the circumstances that might ultimately influence our judgement. At the end of the audit we will form our final opinion by reference to all matters that could be significant to users of the financial statements, including the total effect of any audit misstatements, and our evaluation of materiality at that date.

5.4 Fees

The Audit Commission has published a scale fee for all authorities. This is defined as the fee required by auditors to meet statutory responsibilities under the Audit Commission Act in accordance with the Code of Audit Practice 2010. The indicative fee scale for the audit of Fareham Borough Council is £64,307.

5.5 Your audit team

The engagement team is led by Kate Handy, who is supported by Martin Young who is responsible for the day-to-day direction of audit work and is the key point of contact for the finance team. All members of the team have significant external audit experience in the local government sector.

5.6 Timetable of communication, deliverables and insights

We have set out below a timetable showing the key stages of the audit, including the VFM work and the Whole of Government Accounts. The timetable includes the deliverables we have agreed to provide to the Council through the Audit and Governance Committee's cycle in 2014/15. These dates are determined to ensure our alignment with the Audit Commission's rolling calendar of deadlines.

From time to time matters may arise that require immediate communication with the Audit and Governance Committee and we will discuss them with the Committee Chair as appropriate.

Following the conclusion of our audit we will prepare an Annual Audit Letter to communicate the key issues arising from our work to the Council and external stakeholders, including members of the public.

Audit phase	Timetable	Audit and Governance Committee timetable	Deliverables
High level planning:	January	April 2014	Audit Fee letter
Risk assessment and setting of scopes	January – March 2015	June 2015	Audit Plan
Understanding routine processes and controls and early substantive testing	January – March 2015	June 2015	Audit Plan
Year-end audit	July - August 2015	September 2015	 Report to those charged with governance via the audit results report Audit report (including our opinion on the financial statements and a value for money conclusion). Audit completion certificate Reporting to the National Audit Office (NAO), to the extent and in the form required by them on the Council's Whole of Government Accounts return.
Conclusion of reporting	October	November 2015	Annual Audit Letter

In addition to the above formal reporting and deliverables we will seek to provide practical business insights and updates on regulatory matters.

6. Independence

6.1 Introduction

The APB Ethical Standards and ISA (UK and Ireland) 260 'Communication of audit matters with those charged with governance', requires us to communicate with you on a timely basis on all significant facts and matters that bear on our independence and objectivity. The Ethical Standards, as revised in December 2010, require that we do this formally both at the planning stage and at the conclusion of the audit, as well as during the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

Required communications

Planning stage

Final stage

- The principal threats, if any, to objectivity and independence identified by EY including consideration of all relationships between you, your affiliates and directors and us;
- The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality Review;
- The overall assessment of threats and safeguards;
- Information about the general policies and process within EY to maintain objectivity and independence.
- A written disclosure of relationships (including the provision of non-audit services) that bear on our objectivity and independence, the threats to our independence that these create, any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed;
- Details of non-audit services provided and the fees charged in relation thereto;
- ▶ Written confirmation that we are independent;
- Details of any inconsistencies between APB Ethical Standards, the Audit Commission's Standing Guidance and your policy for the supply of non-audit services by EY and any apparent breach of that policy; and
- An opportunity to discuss auditor independence issues.

During the course of the audit we must also communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of our safeguards, for example when accepting an engagement to provide non-audit services.

We also provide information on any contingent fee arrangements, the amounts of any future contracted services, and details of any written proposal to provide non-audit services.

We ensure that the total amount of fees that EY and our network firms have charged to you and your affiliates for the provision of services during the reporting period are disclosed, analysed in appropriate categories.

6.2 Relationships, services and related threats and safeguards

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including any principal threats. However we have adopted the safeguards below to mitigate these threats along with the reasons why they are considered to be effective.

Self-interest threats

A self-interest threat arises when EY has financial or other interests in your entity. Examples include where we have an investment in your entity; where we receive significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with the Council.

At the time of writing, there are no long outstanding fees.

We believe that it is appropriate for us to undertake permissible non-audit services, and we will comply with the policies that the Council has approved and that are in compliance with the Audit Commission's Standing Guidance.

A self-interest threat may also arise if members of our audit engagement team have objectives or are rewarded in relation to sales of non-audit services to the Council. We confirm that no member of our audit engagement team, including those from other service lines, is in this position, in compliance with Ethical Standard 4.

There are no other self-interest threats at the date of this report

Self-review threats

Self-review threats arise when the results of a non-audit service performed by EY or others within the EY network are reflected in the amounts included or disclosed in the financial statements.

There are no other self-review threats at the date of this report.

Management threats

Partners and employees of EY are prohibited from taking decisions on behalf of management of your entity. Management threats may also arise during the provision of a non-audit service where management is required to make judgements or decisions based on that work.

There are no management threats at the date of this report.

Other threats

Other threats, such as advocacy, familiarity or intimidation, may arise.

There are no other threats at the date of this report.

Overall Assessment

Overall we consider that the adopted safeguards appropriately mitigate the principal threats identified, and we therefore confirm that EY is independent and the objectivity and independence of Kate Handy, the audit engagement Director and the audit engagement team have not been compromised.

6.3 Other required communications

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 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 ended 27 June 2014 and can be found here:

http://www.ey.com/UK/en/About-us/EY-UK-Transparency-Report-2014

Appendix A Fees

A breakdown of our agreed fee is shown below.

	Planned Fee 2014/15 £	Actual fee 2013/14 £	Explanation
Opinion Audit and VFM Conclusion	64,307	64,307	
Total Audit Fee – Code work	64,307	64,307	
Certification of claims and returns ¹	15,080	22,199	
Non-audit work	0	0	

All fees exclude VAT.

The agreed fee presented above is based on the following assumptions:

- Officers meeting the agreed timetable of deliverables;
- ▶ the level of risk in relation to the audit of the financial statements is consistent with the Audit Commission's assumptions when setting the scale fee;
- The operating effectiveness of internal controls;
- ► The Audit Commission making no significant changes to the value for money criteria on which our conclusion will be based;
- Our accounts opinion and value for money conclusion being unqualified;
- Appropriate quality of documentation is provided by the Council; and
- ▶ The Council has an effective control environment.

If any of the above assumptions prove to be unfounded, we will seek a variation to the agreed fee. This will be discussed with the Council in advance.

Fees for the auditor's consideration of correspondence from the public and formal objections will be charged in addition to the scale fee.

¹ Our fee for the certification of grant claims is based on the indicative scale fee set by the Audit Commission.

Appendix B UK required communications with those charged with governance

There are certain communications that we must provide to the Audit and Governance Committee. These are detailed here:

Required communication	Reference	
Planning and audit approach	► Audit Plan	
Communication of the planned scope and timing of the audit including any limitations.		
 Significant findings from the audit ➤ Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures ➤ Significant difficulties, if any, encountered during the audit ➤ Significant matters, if any, arising from the audit that were discussed with management ➤ Written representations that we are seeking ➤ Expected modifications to the audit report ➤ Other matters if any, significant to the oversight of the financial reporting process 	Report to those charged with governance	
Misstatements ► Uncorrected misstatements and their effect on our audit opinion ► The effect of uncorrected misstatements related to prior periods ► A request that any uncorrected misstatement be corrected ► In writing, corrected misstatements that are significant	Report to those charged with governance	
 Fraud Enquiries of the Audit and Governance Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity Any fraud that we have identified or information we have obtained that indicates that a fraud may exist A discussion of any other matters related to fraud 	Report to those charged with governance	
Related parties Significant matters arising during the audit in connection with the entity's related parties including, when applicable: ► Non-disclosure by management ► Inappropriate authorisation and approval of transactions ► Disagreement over disclosures ► Non-compliance with laws and regulations ► Difficulty in identifying the party that ultimately controls the entity	► Report to those charged with governance	
External confirmations ► Management's refusal for us to request confirmations ► Inability to obtain relevant and reliable audit evidence from other procedures	 Report to those charged with governance 	
Consideration of laws and regulations ➤ Audit findings regarding non-compliance where the non-compliance is material and believed to be intentional. This communication is subject to compliance with legislation on tipping off ► Enquiry of the Audit and Governance 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 and Governance Committee may be aware of	 Report to those charged with governance 	

Required communication	Reference	
Independence	▶ Audit Plan	
Communication of all significant facts and matters that bear on EY's objectivity and independence	 Report to those charged with governance 	
Communication of key elements of the audit engagement director's consideration of independence and objectivity such as:		
► The principal threats		
 Safeguards adopted and their effectiveness 		
 An overall assessment of threats and safeguards 		
 Information about the general policies and process within the firm to maintain objectivity and independence 		
Going concern	► Report to those charged	
Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:	with governance	
▶ Whether the events or conditions constitute a material uncertainty		
▶ Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements		
► The adequacy of related disclosures in the financial statements		
Significant deficiencies in internal controls identified during the audit	 Report to those charged with governance 	
Fee Information	► Audit Plan	
▶ Breakdown of fee information at the agreement of the initial audit plan	 Report to those charged 	
reakdown of fee information at the completion of the audit	with governance	
	 Annual Audit Letter if considered necessary 	
Certification work ▶ Summary of certification work undertaken	 Annual Report to those charged with governance summarising grant certification, and Annual Audit Letter if considered necessary 	

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