

# Agenda Item 7

## AUDIT COMMITTEE REPORT - 31 JANUARY 2013

**EXTERNAL AUDIT PLAN 2012/13  
Report of John Prentice, Director, KPMG.**

**(Information from the Audit Commission on a  
Proposed Work Programme and Scale of Fees 2013/14  
is attached to the report)**

**Recommendation**

**That the Committee notes the External Audit Plan  
2012/13 and the information from the Audit  
Commission.**





*cutting through complexity™*

# External Audit Plan 2012/13

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Sheffield City Council

January 2013



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in connection with this  
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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 has issued a document entitled *Statement of Responsibilities of Auditors and Audited Bodies*. This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. We draw your attention to this document which is available on the Audit Commission's website at [www.auditcommission.gov.uk](http://www.auditcommission.gov.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. If you have any concerns or are dissatisfied with any part of KPMG's work, in the first instance you should contact John Prentice, the appointed engagement lead to the Authority, who will try to resolve your complaint. If you are dissatisfied with your response please contact Trevor Rees on 0161 246 4000, or by email to [trevor.rees@kpmg.co.uk](mailto:trevor.rees@kpmg.co.uk), who is the national contact partner for all of KPMG's work with the Audit Commission. After this, if you are still dissatisfied with how your complaint has been handled you can access the Audit Commission's complaints procedure. Put your complaint in writing to the Complaints Unit Manager, Audit Commission, Westward House, Lime Klin Close, Stoke Gifford, Bristol, BS34 8SR or by email to [complaints@audit-commission.gov.uk](mailto:complaints@audit-commission.gov.uk). Their telephone number is 0844 798 3131, textphone (minicom) 020 7630 0421.

# Section one Introduction



This document describes  
how we will deliver our audit  
work for Sheffield City  
Council.

## Scope of this report

We are pleased to be appointed as your external auditors for 2012/13. This document describes how we will deliver our financial statements audit work for Sheffield City Council. It supplements our *Audit Fee Letter 2012/13* sent to you in August 2012.

We also set out our approach to value for money (VFM) work for 2012/13.

We are required to satisfy ourselves that your accounts comply with statutory requirements and that proper practices have been observed in compiling them. We use a risk based audit approach.

The audit planning process and risk assessment is an on-going process and the assessment and fees in this plan will be kept under review and updated if necessary.

## Structure of this report

This report is structured as follows:

- Section 2 includes our headline messages, focusing on the key risks identified this year for the financial statements audit.
- Section 3 describes the approach we take for the audit of the financial statements.
- Section 4 provides further detail on the financial statements audit risks.
- Section 5 explains our approach to VFM work.
- Section 6 provides information on the audit team, our proposed deliverables, the timescales and fees for our work.

## Acknowledgements

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

Our statutory responsibilities and powers are set out in the *Audit Commission Act 1998*, the *Local Government Act 1999* and the Audit Commission's *Code of Audit Practice*.

The *Code of Audit Practice* summarises our responsibilities into two objectives, requiring us to review and report on your:

- *financial statements (including the Annual Governance Statement)*:
  - providing an opinion on your accounts; and
  - use of resources: concluding on the arrangements in place for securing economy, efficiency and effectiveness in your use of resources (the value for money conclusion).

The Audit Commission's *Statement of Responsibilities of Auditors and Audited Bodies* sets out the respective responsibilities of the auditor and the Authority.

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We have identified a number of key risks that we will focus on during the audit of the 2012/13 financial statements.  
These are described in more detail on pages 10, 11 and 12.

The remainder of this document provides information on our:  
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- approach to the audit of the financial statements;
- approach to VFM work; and
- audit team, proposed deliverables, timescales and fees for our work.

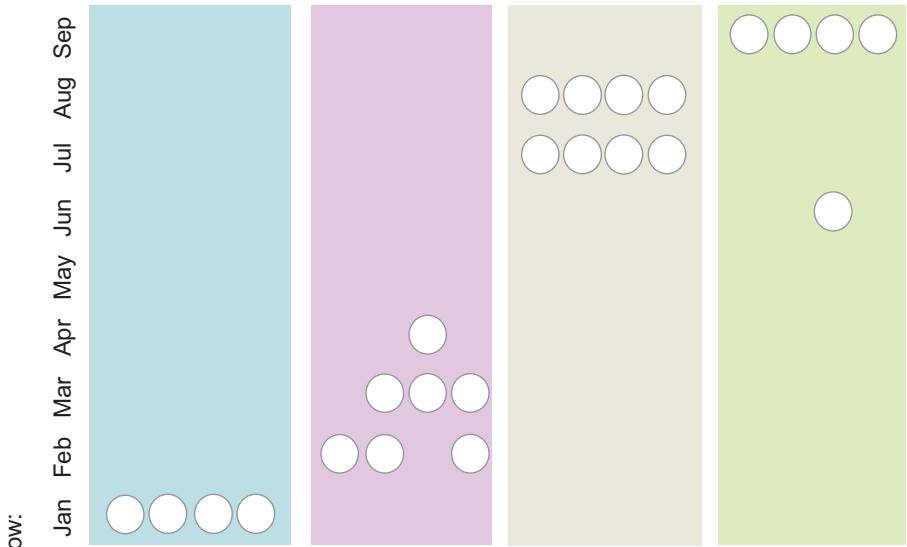
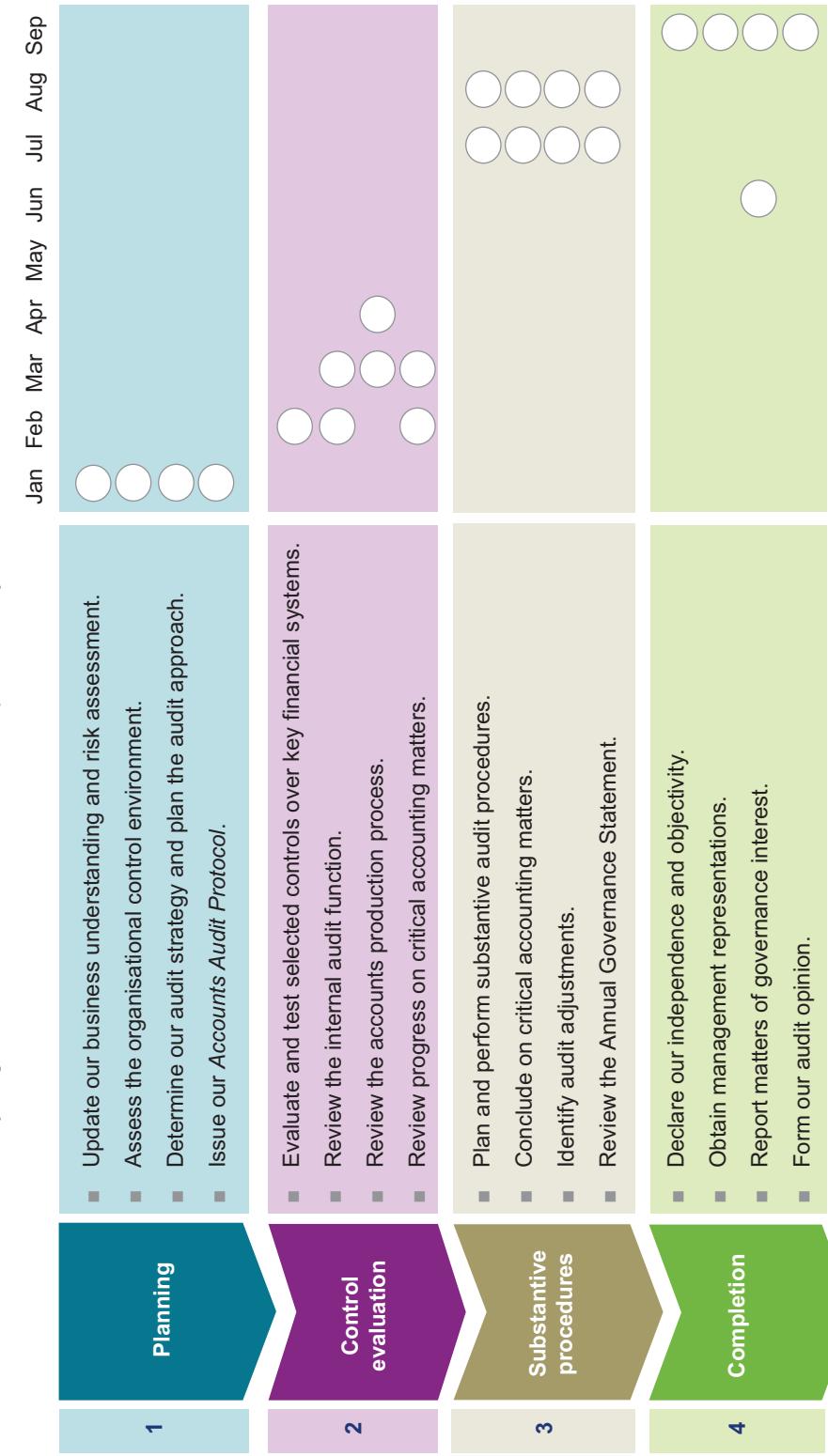
Area	Risk	Audit work
<b>Savings plans</b>	<p>The Authority currently estimates that it will need to deliver £50m in savings during 2013/14 to address further reductions to local authority funding and continued cost pressures.</p> <p>The Authority will need to establish and manage its savings plans to secure longer term financial and operational sustainability and ensure that any related liabilities are accounted for in its 2012/13 financial statements as appropriate.</p>	<p>In conjunction with our VFM work, we will critically assess the controls you have in place to ensure a sound financial standing and review how you are managing your savings plans.</p> <p>We will also review the Authority's assessment of material liabilities and provisions in its 2012/13 financial statements.</p>
<b>Highways PFI</b>	<p>In August 2012 the £1.5billion Highways Private Finance Initiative (PFI) contract with Amey commenced. The scheme covers the refurbishment and maintenance of the Authority's roads, pavements, lighting and bridges, and the transfer of staff to the new provider.</p> <p>PFI accounting schemes involve complex transactions, judgements and estimates and can cause significant changes to the accounts.</p>	<p>We will discuss and review the Authority's proposed accounting treatments in the affected areas.</p>
<b>Digital Region Limited</b>	<p>Digital Region Limited is a joint venture between the four South Yorkshire local authorities to provide broadband services across South Yorkshire. These local authorities have taken the decision to re-tender the associated contract.</p> <p>Re-tendering has already involved providing for significant costs, and the process will not be concluded until early in 2013. Digital Region Limited also has significant liabilities, which the Authority and its partners would need to fund if re-tendering is unsuccessful.</p>	<p>We will review the Authority's value for money arrangements in managing the potential issues and consequences concerning Digital Region Limited .</p>
<b>Property, plant and equipment</b>	<p>The potential for impairment/valuation changes , particularly the accounting of schools transferring to Academy or Foundation status, makes this balance inherently risky due to the high level of judgement and estimation uncertainty.</p>	<p>We will gain an understanding of the main changes impacting on 2012/13 and review the accounting for those changes, particularly schools land and buildings.</p>
<b>Pensions' costs and liabilities</b>	<p>Pensions costs and liabilities require a significant level of expertise, judgement and estimation and are therefore more susceptible to error. Reliance is often placed on the actuary with limited checking of the results of their work.</p>	<p>We will perform work required by auditing standards where an expert is used. Specific testing of pension calculations will be performed.</p>

## Section three Our audit approach

We undertake our work on your financial statements in four key stages during 2013:

- Planning (December 2012 and January 2013).
- Control Evaluation (February to April).
- Substantive Procedures (July and August).
- Page Completion (September).

We have summarised the four key stages of our financial statements audit process for you below:



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## Section three Our audit approach - planning

**During December 2012 and January 2013 we complete our planning work.**  
**We assess the key risks affecting the Authority's financial statements and discuss these with officers.**  
**We assess if there are any weaknesses in respect of central processes, including the Authority's IT systems, that would impact on our audit.**

Our planning work takes place in December 2012 and January 2013. This involves the following aspects:

- Update our business understanding and risk assessment.
- Assess the organisational control environment.
- Determine our audit strategy and plan the audit approach.
- Issue our *Accounts Audit Protocol*.

### Planning

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**We determine our audit strategy and approach, and agree a protocol for the accounts audit, specifying what evidence we expect from the Authority to support the financial statements.**

### Organisational control environment

Controls operated at an organisational level often have an impact on controls at an operational level and if there were weaknesses this would impact on our audit. Most of the organisational controls we assess were previously linked to the use of resources assessment. In particular risk management, internal control and ethics and conduct have implications for our financial statements audit.

The Authority relies on information technology (IT) to support both financial reporting and internal control processes. In order to satisfy ourselves that we can rely on the use of IT, we may test controls over access to systems and data, system changes, system development and computer operations. Whilst we undertake some general IT controls work, we also focus on testing the specific applications and reports that are pivotal to the production of the financial statements.

### Audit strategy and approach

The Engagement Lead sets the overall direction of the audit and decides the nature and extent of audit activities.

We design audit procedures in response to the risk that the financial statements are materially misstated. The materiality level is a matter of judgement and is set by the Engagement Lead.

### Accounts audit protocol

At the end of our planning work we will issue our *Accounts Audit Protocol*. This important document sets out our audit approach and timetable. It also summarises the working papers and other evidence we require the Authority to provide during our interim and final accounts visits.

As your previous auditor we met with the Director of Finance to discuss mutual learning points from the 2011/12 audit. These points will be incorporated into our work plan for 2012/13. We will revisit progress against areas identified for development as the audit progresses.

## Section three Our audit approach – control evaluation

**During February to April 2013 we will complete our interim audit work.**  
**We assess if controls over key financial systems were effective during 2012/13. We work with your Internal Audit team to avoid duplication.**

Our interim visit on site will be completed between February and April 2013. During this time we will complete work in the following areas:

- Evaluate and test controls over key financial systems.
- Review the internal audit function.
- Review the accounts production process.
- Review progress on critical accounting matters.

### Control Evaluation

**We work with your finance team to enhance the efficiency of the accounts department.**  
**We will present our Interim Report to the Audit Committee in June/July 2013.**

We update our understanding of the Authority's key financial processes where our risk assessment has identified that these are relevant to our final accounts audit and where we have determined that this is the most efficient audit approach to take. We confirm our understanding by completing walkthroughs for these systems. We then test selected controls that address key risks within these systems. The strength of the control framework informs the substantive testing we complete during our final accounts visit.

Appendix 1 illustrates how we determine the most effective balance of internal controls and substantive audit testing.

Where our audit approach is to undertake controls work on financial systems, we seek to rely on any relevant work Internal Audit has completed, to minimise unnecessary duplication of work. Our audit fee is set on the assumption that we can place reliance on that work. We have a joint working protocol and have met with Internal Audit to discuss the principles and timetables for the managed audit process for 2012/13.

### Review of internal audit

Where we intend to rely on internal audit's work in respect of the Authority's key financial systems, auditing standards require us to review aspects of their work. This includes re-performing a sample of tests completed by internal audit. We will provide feedback to Internal Audit at the end of our interim visit.

### Accounts production process

Your previous auditor raised a recommendation in his *Report to Those Charged with Governance (SA 260 Report) 2011/12* relating to delays in the completion of a number of important accounting reconciliations during that year.

We will assess the Authority's progress in addressing that recommendation and in preparing for the closedown and accounts preparation.

### Critical accounting matters

We will discuss the work completed to address the specific risks we identified at the planning stage. Wherever possible, we seek to review relevant workings and evidence and agree the accounting treatment as part of our interim work.

Following our interim visit we will issue our *Interim Report* which will set out the findings of our planning and interim work. This will be discussed at the Audit Committee meeting in June/July 2013.

## Section three **Our audit approach – substantive procedures**

**During July and August 2013 we will be on site for our substantive work.**

**We complete detailed testing of accounts and disclosures and conclude on critical accounting matters, such as specific risk areas. We then agree any audit adjustments required to the financial statements.**

**We also review the Annual Governance Statement for consistency with our understanding.**

**We will present our ISA 260 Report to the Audit Committee in September 2013.**

Our final accounts visit on site has been provisionally scheduled for the period July to August. During this time, we will complete the following work:

- Plan and perform substantive audit procedures.
- Conclude on critical accounting matters.
- Identify and assess any audit adjustments.
- Review the Annual Governance Statement.

### **Substantive procedures**

At the end of our on site work, we will hold a closure meeting, where we will provide a schedule of audit differences and agree a timetable for the completion stage and the accounts sign off.

To comply with auditing standards, we are required to report uncorrected audit differences (unless trivial) to the Audit Committee. 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.

### **Annual Governance Statement**

We are also required to satisfy ourselves that your Annual Governance Statement complies with the applicable framework and is consistent with our understanding of your operations. Our review of the work of internal audit and consideration of your risk management and governance arrangements are key to this.

We report the findings of our final accounts work in our ISA 260 Report, which we will issue to Audit Committee in September 2013.

### **Substantive audit procedures**

We complete detailed testing on significant balances and disclosures. The extent of our work is determined by the Engagement Lead based on various factors such as our overall assessment of the Authority's control environment, the effectiveness of controls over individual systems and the management of specific risk factors.

### **Critical accounting matters**

We conclude our testing of the key risk areas as identified at the planning stage and any additional issues that may have emerged since. We will discuss our early findings on the Authority's actions to address the key risk areas with the Director of Finance, prior to reporting to the Audit Committee in September 2013.

### **Audit adjustments**

During our on site work, we will meet with the Finance Manager (Financial Planning and Accounting) on a weekly basis to discuss the progress of the audit, any differences found and any other issues emerging.

**In addition to the financial statements, we also audit the Authority's Whole of Government Accounts pack.**

**We may need to undertake additional work if we receive objections to the accounts from local electors.**

#### **Whole of government accounts (WGA)**

We are required to review and issue an opinion on your WGA consolidation to confirm that this is consistent with your financial statements. The audit approach has been agreed with HM Treasury and the National Audit Office.

**We will communicate with you throughout the year, both formally and informally.**

#### **Use of off-shore audit resources**

During our audit work we may make use of our KPMG Global Services (KGS Audit) team in India to undertake certain basic audit tasks and functions. Use of this 'offshore' team is one of many initiatives we employ to deliver a cost-effective audit service for our clients. Although based in India, the KGS Audit team works closely with our local audit teams to undertake certain audit procedures remotely. We have provided our UK teams with guidance on the types of audit procedures and other tasks that it is suitable and permissible to use KGS Audit for - we do not use KGS Audit for any audit procedures that involve access to personal, confidential or sensitive information. Audit tasks are then allocated by our UK-based engagement teams to dedicated teams in India, allowing local staff to control what work KGS Audit undertakes and what information is accessed. They operate to our same quality standards and all work undertaken by KGS Audit is reviewed by the UK team.

The KGS Audit team operates in a paperless environment and we apply robust processes to control how data is accessed and used:

- all work is conducted electronically;
- all data files are maintained on servers in the UK with restricted access and only viewed on screen in India. These servers are governed by established KPMG IT controls;
- policy and technology restrictions are in place to protect data, for example locked down USB ports, no external emailing, no printing;
- KGS Audit staff are based in an office with restricted access and security, and
- the team members adhere to global KPMG ethics and independence standards, along with requirements governing the non-disclosure of client information.

#### **Reporting and communication**

Reporting is a key part of the audit process, not only in communicating the audit findings for the year, but also in ensuring the audit team are accountable to you in addressing the issues identified as part of the audit strategy. Throughout the year we will communicate with you through meetings with the finance team and the Audit Committee. Our deliverables are included on page 18.

We are required to review and issue an opinion on your WGA consolidation to confirm that this is consistent with your financial statements. The audit approach has been agreed with HM Treasury and the National Audit Office.

The Audit Commission Act 1998 gives electors certain rights. These are:

- the right to inspect the accounts;
- the right to ask the auditor questions about the accounts; and
- the right to object to the accounts.

As a result of these rights, in particular the right to object to the accounts, we may need to undertake additional work to form our decision on the elector's objection. The additional work could range from a small piece of work where we interview an officer and review evidence to form our decision to a more detailed piece of work, where we have to interview a range of officers, review significant amounts of evidence and seek legal representations on the issues raised.

The costs incurred in responding to questions or objections raised by electors is not part of the fee. This work will be charged in accordance with the Audit Commission's fee scales.

**Our independence and objectivity responsibilities under the Code are summarised in Appendix 2.**  
**We confirm our audit team's independence and objectivity is not impaired.**

#### **Independence and objectivity confirmation**

Professional standards require auditors to communicate to those charged with governance, at least annually, all relationships that may bear on the firm's independence and the objectivity of the audit engagement partner and audit staff. The standards also place requirements on auditors in relation to integrity, objectivity and independence.

The standards define 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case this is the Audit Committee.

KPMG LLP is committed to being and being seen to be independent. APB Ethical Standard 1 Integrity, Objectivity and Independence requires us to communicate to you in writing all significant facts and matters, including those related to the provision of non-audit services and the safeguards put in place, in our professional judgement, may reasonably be thought to bear on KPMG LLP's independence and the objectivity of the Engagement Lead and the audit team.

#### **Confirmation statement**

We confirm that as of 21 January 2013 in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the Engagement Lead and audit team is not impaired.

## Section four Key financial statements audit risks

For each key risk area we have outlined the impact on our audit plan.  
**We will provide an update on how the Authority is managing these risks in our *Interim Audit Report*.**

Key audit risks	Impact on audit
<p><b>Audit areas affected</b></p> <ul style="list-style-type: none"> <li>■ Reserves and balances</li> <li>■ Provisions</li> </ul> 	<p><b>Risk</b></p> <p>As at November 2012, the Authority is forecasting that it will deliver its 2012/13 budget in overall terms. This includes a savings programme totalling £55 million. The Authority currently estimates that another £50m in savings will need to be achieved during 2013/14 to address the further reductions to local authority funding. Against a backdrop of continued demand pressures, it will become more and more difficult to deliver these savings in a way that secures longer term financial and operational sustainability.</p> <p>If there are any related liabilities at year end, these will need to be accounted for in the 2012/13 financial statements as appropriate</p> <p><b>Our audit work</b></p> <p>In conjunction with our VFM work we will critically assess the controls the Authority has in place to ensure a sound financial standing, specifically that its Medium Term Financial Plan has duly taken into consideration the potential funding reductions and that it is sufficiently robust to ensure that the Authority can continue to provide services effectively. We will also review how the Authority is planning and managing its savings plans.</p> <p>As part of our final accounts audit we will review the Authority's assessment of any potential liabilities arising from its savings plans against the Code. If applicable, we will review the Authority's provisions, including the methodology, assumptions and calculations.</p>

## Section four Key financial statements audit risks (continued)

Key audit risks	Impact on audit
<p>For each key risk area we have outlined the impact on our audit plan.</p> <p>We will provide an update on how the Authority is managing these risks in our Interim Report.</p>  <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <b>Audit areas affected</b> <ul style="list-style-type: none"> <li>■ Asset and liability recognition and de-recognition</li> <li>■ Accounts disclosure</li> </ul> </div>	<p>The Authority has started a £1.5billion Highways Private Finance Initiative (PFI) contract with Amey. The scheme covers the refurbishment and maintenance of the Authority's roads, pavements, lighting and bridges, and has involved the transfer of Streetforce staff to the provider.</p> <p>PFI accounting schemes involve complex transactions, judgements and estimates and will involve significant changes to the financial statements.</p> <p><b>Our audit work</b></p> <p>As part of our interim work we will review the processes the Authority has put in place to ensure PFI related transactions are properly identified, controlled and correctly captured. As part of our final accounts audit we will review the appropriateness of the accounting entries and disclosures in the accounts.</p>
 <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <b>Audit areas affected</b> <ul style="list-style-type: none"> <li>■ Provisions</li> <li>■ Reserves</li> </ul> </div>	<p>Digital Region Limited (DRL) is a joint venture between the four South Yorkshire local authorities to provide broadband services across South Yorkshire. These local authorities have taken the decision to provide for significant costs, and the process will not be concluded until early in 2013. DRL also has significant liabilities, which the Authority and its partners would need to fund if re-tendering is unsuccessful.</p> <p><b>Our audit work</b></p> <p>We will review the Authority's management of, and accounting for, the potential issues concerning DRL.</p>

## Section four Key financial statements audit risks (continued)

Key audit risks	Impact on audit
<p>For each key risk area we have outlined the impact on our audit plan.</p> <p>We will provide an update on how the Authority is managing these risks in our Interim Report.</p>	<p><b>Risk</b></p> <p>The potential for impairment/valuation changes, particularly the accounting of schools transferring to Academy or Foundation status, makes this balance inherently risky due to the high level of judgement and estimation uncertainty. These changes in valuation are often very significant when considered in relation to Performance Materiality.</p> <p>Some elements can also involve complex accounting. This is usually a presentational issue rather than a capitalisation issue.</p> <p><b>Our audit work</b></p> <p>We will gain an understanding of the main changes impacting on 2012/13 and review the accounting for those changes, particularly schools' land and buildings.</p>

For each key risk area we have outlined the impact on our audit plan.

We will provide an update on how the Authority is managing these risks in our Interim Report.

**Our approach to VFM work follows guidance provided by the Audit Commission.**

#### **Background to approach to VFM work**

In meeting their statutory responsibilities relating to economy, efficiency and effectiveness, the Commission's *Code of Audit Practice* requires auditors to:

- plan their work based on consideration of the significant risks of giving a wrong conclusion (audit risk); and
- carry out only as much work as is appropriate to enable them to give a safe VFM conclusion.

To provide stability for auditors and audited bodies, the Audit Commission has kept the VFM audit methodology unchanged from last year. There are only relatively minor amendments to reflect the key issues facing the local government sector.

The approach is structured under two themes, as summarised below.

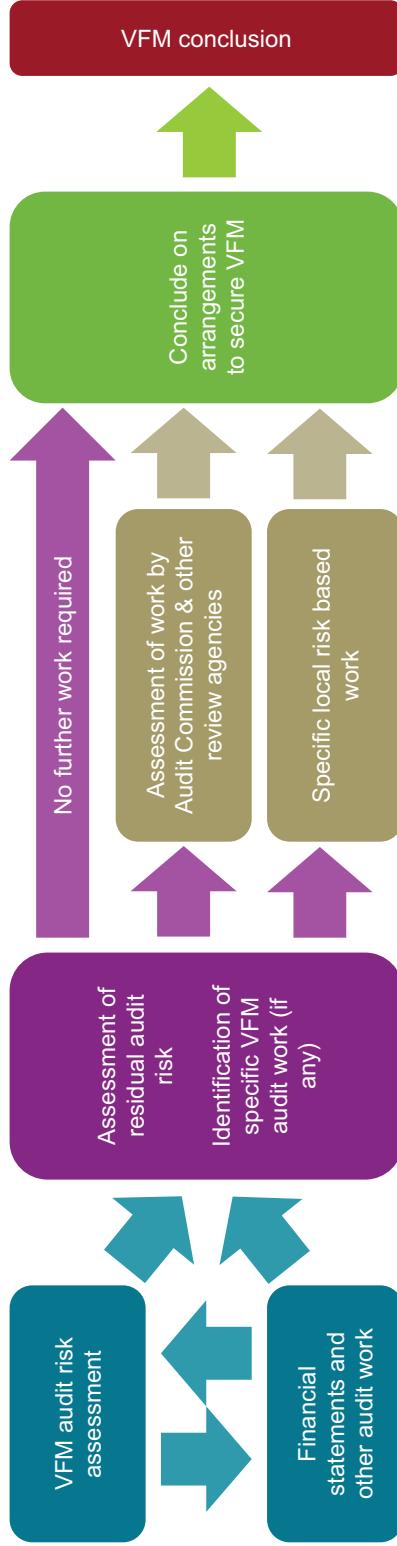
Specified criteria for VFM conclusion	Focus of the criteria	Sub-sections
The organisation has proper arrangements in place for securing financial resilience.	<p>The organisation has robust systems and processes to:</p> <ul style="list-style-type: none"> <li>■ manage effectively financial risks and opportunities; and</li> <li>■ secure a stable financial position that enables it to continue to operate for the foreseeable future.</li> </ul>	<ul style="list-style-type: none"> <li>■ Financial governance</li> <li>■ Financial planning</li> <li>■ Financial control</li> </ul>
The organisation has proper arrangements for challenging how it secures economy, efficiency and effectiveness.	<p>The organisation is prioritising its resources within tighter budgets, for example by:</p> <ul style="list-style-type: none"> <li>■ achieving cost reductions; and</li> <li>■ improving efficiency and productivity.</li> </ul>	<ul style="list-style-type: none"> <li>■ Prioritising resources</li> <li>■ Improving efficiency and productivity</li> </ul>

## Section five VFM audit approach (continued)

We will follow a risk based approach to target audit effort on the areas of greatest audit risk.

### Overview of the VFM audit approach

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



Each of these stages are summarised further below.

VFM audit stage	Audit approach
<b>VFM audit risk assessment</b>	<p>We consider the relevance and significance of the potential business risks faced by all local authorities, and other risks that apply specifically to the Authority. These are the significant operational and financial risks in achieving statutory functions and objectives, which are relevant to auditors' responsibilities under the <i>Code of Audit Practice</i>.</p> <p>In doing so we consider:</p> <ul style="list-style-type: none"> <li>■ the Authority's own assessment of the risks it faces, and its arrangements to manage and address its risks;</li> <li>■ information from the Audit Commission's financial ratios tool;</li> <li>■ evidence gained from previous audit work, including the response to that work; and</li> <li>■ the work of the Audit Commission, other inspectorates and review agencies.</li> </ul>

## Section five VFM audit approach (continued)

VFM audit stage	Audit approach
<b>Linkages with financial statements and other audit work</b>	<p>There is a degree of overlap between the work we do as part of the VFM audit and our financial statements audit. For example, our financial statements audit includes an assessment and testing of the Authority's organisational control environment, including the Authority's financial management and governance arrangements, many aspects of which are relevant to our VFM audit responsibilities.</p> <p>We avoid duplication of audit effort by integrating our financial statements and VFM work, and this will continue. We will therefore draw upon relevant aspects of our financial statements audit work to inform the VFM audit.</p>
<b>Assessment of residual audit risk</b>	<p>It is possible that further audit work may be necessary in some areas to ensure sufficient coverage of the two VFM criteria.</p> <p>Such work may involve interviews with relevant officers and /or the review of documents such as policies, plans and minutes. We may also refer to any self assessment the Authority may prepare against the characteristics.</p> <p>To inform any further work we must draw together an assessment of residual audit risk, taking account of the work undertaken already. This will identify those areas requiring further specific audit work to inform the VFM conclusion.</p> <p>At this stage it is not possible to indicate the number or type of residual audit risks that might require additional audit work, and therefore the overall scale of work cannot be easily predicted. If a significant amount of work is necessary then we will need to review the adequacy of our agreed audit fee.</p>
<b>Identification of specific VFM audit work</b>	<p>If we identify residual audit risks, then we will highlight the risk to the Authority and consider the most appropriate audit response in each case, including:</p> <ul style="list-style-type: none"> <li>■ considering the results of work by the Authority, the Audit Commission, other inspectorates and review agencies; and</li> <li>■ carrying out local risk-based work to form a view on the adequacy of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources.</li> </ul>

Our VFM audit will draw heavily on other audit work which is relevant to our VFM responsibilities and the results of last year's VFM audit.

We will then form an assessment of residual audit risk to identify if there are any areas where more detailed VFM audit work is required.

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## Section five VFM audit approach (continued)

VFM audit stage	Audit approach
<b>Where relevant, we may draw upon the range of audit tools and review guides developed by the Audit Commission.</b>	<p>Depending on the nature of the residual audit risk identified, we may be able to draw on audit tools and sources of guidance when undertaking specific local risk-based audit work, such as:</p> <ul style="list-style-type: none"> <li>■ local savings review guides based on selected previous Audit Commission national studies; and</li> <li>■ update briefings for previous Audit Commission studies.</li> </ul> <p>The tools and guides will support our work where we have identified a local risk that is relevant to them. For any residual audit risks that relate to issues not covered by one of these tools, we will develop an appropriate audit approach drawing on the detailed VFM guidance and other sources of information.</p>
<b>We will report on the results of the VFM audit through our <i>Interim Audit Report</i> and our <i>Report to those charged with governance</i>.</b>	<p>At the conclusion of the VFM audit we will consider the results of the work undertaken and assess the assurance obtained against each of the VFM themes regarding the adequacy of the Authority's arrangements for securing economy, efficiency and effectiveness in the use of resources.</p> <p>If any issues are identified that may be significant to this assessment, and in particular if there are issues that indicate we may need to consider qualifying our VFM conclusion, we will discuss these with management as soon as possible. Such issues will also be considered more widely as part of KPMG's quality control processes, to help ensure the consistency of auditors' decisions.</p>
<b>Concluding on VFM arrangements</b>	
<b>Reporting</b>	<p>We will report on the results of the VFM audit through our <i>Interim Audit Report</i> and our <i>Report to those charged with governance</i>. These reports will summarise our progress in delivering the VFM audit, the results of the risk assessment and any specific matters arising, and the basis for our overall conclusion.</p> <p>The key output from the work will be the VFM conclusion (i.e. our opinion on the Authority's arrangements for securing VFM), which forms part of our audit report.</p>

Your audit team has been drawn from our specialist public sector assurance department. Our audit team were all part of the Sheffield City Council audit last year. Contact details are shown on page 1.

The audit team will be assisted by other KPMG specialists as necessary.  
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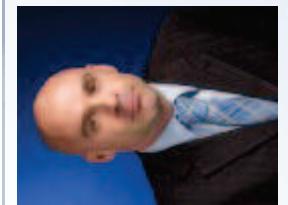
John Prentice  
**Director**



David Phillips  
**Senior Manager**

"I am responsible for the management, review and delivery of the whole audit and providing quality assurance for any technical accounting areas. I will work closely with John Prentice to ensure we add value. I will liaise with the Director of Finance and Head of Internal Audit."

"My role is to lead our team and ensure the delivery of a high quality external audit opinion. I will be the main point of contact for the Audit Committee and Executive Directors."



Stuart Cutts  
**Assistant Manager**

"I will be responsible for the on-site delivery of our work. I will liaise with Finance and Internal Audit Managers. I will also supervise the work of our audit assistants."

## Section five Audit deliverables

At the end of each stage of our audit we issue certain deliverables, including reports and opinions.

Our key deliverables will be delivered to a high standard and on time.

We will discuss and agree each report with the Authority's officers prior to publication.

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Deliverable	Purpose	Committee dates
<b>Planning</b>		
<b>External Audit Plan</b>	<ul style="list-style-type: none"> <li>■ Outline audit approach.</li> <li>■ Identify areas of audit focus and planned procedures.</li> </ul>	<b>January 2013</b>
<b>Control evaluation</b>		
<b>Interim Report</b>	<ul style="list-style-type: none"> <li>■ Details and resolution of control and process issues.</li> <li>■ Identify improvements required prior to the issue of the draft financial statements and the year-end audit.</li> </ul>	<b>June/July 2013</b>
<b>Substantive procedures</b>		
<b>Report to Those Charged with Governance (ISA 260 Report)</b>	<ul style="list-style-type: none"> <li>■ Details the resolution of key audit issues.</li> <li>■ Communication of adjusted and unadjusted audit differences.</li> <li>■ Performance improvement recommendations identified during our audit.</li> <li>■ Commentary on the Authority's value for money arrangements.</li> </ul>	<b>September 2013</b>
<b>Completion</b>		
<b>Auditors' report</b>	<ul style="list-style-type: none"> <li>■ Providing an opinion on your accounts (including the Annual Governance Statement).</li> <li>■ Concluding on the arrangements in place for securing economy, efficiency and effectiveness in your use of resources (the VFM conclusion).</li> </ul>	<b>September 2013</b>
<b>Annual Audit Letter</b>	<ul style="list-style-type: none"> <li>■ Summarises the outcomes and the key issues arising from our audit work for the year.</li> </ul>	<b>November 2013</b>

## Section five Audit timeline

We will be in continuous dialogue with you throughout the audit.

**Key formal interactions with the Audit Committee are:**

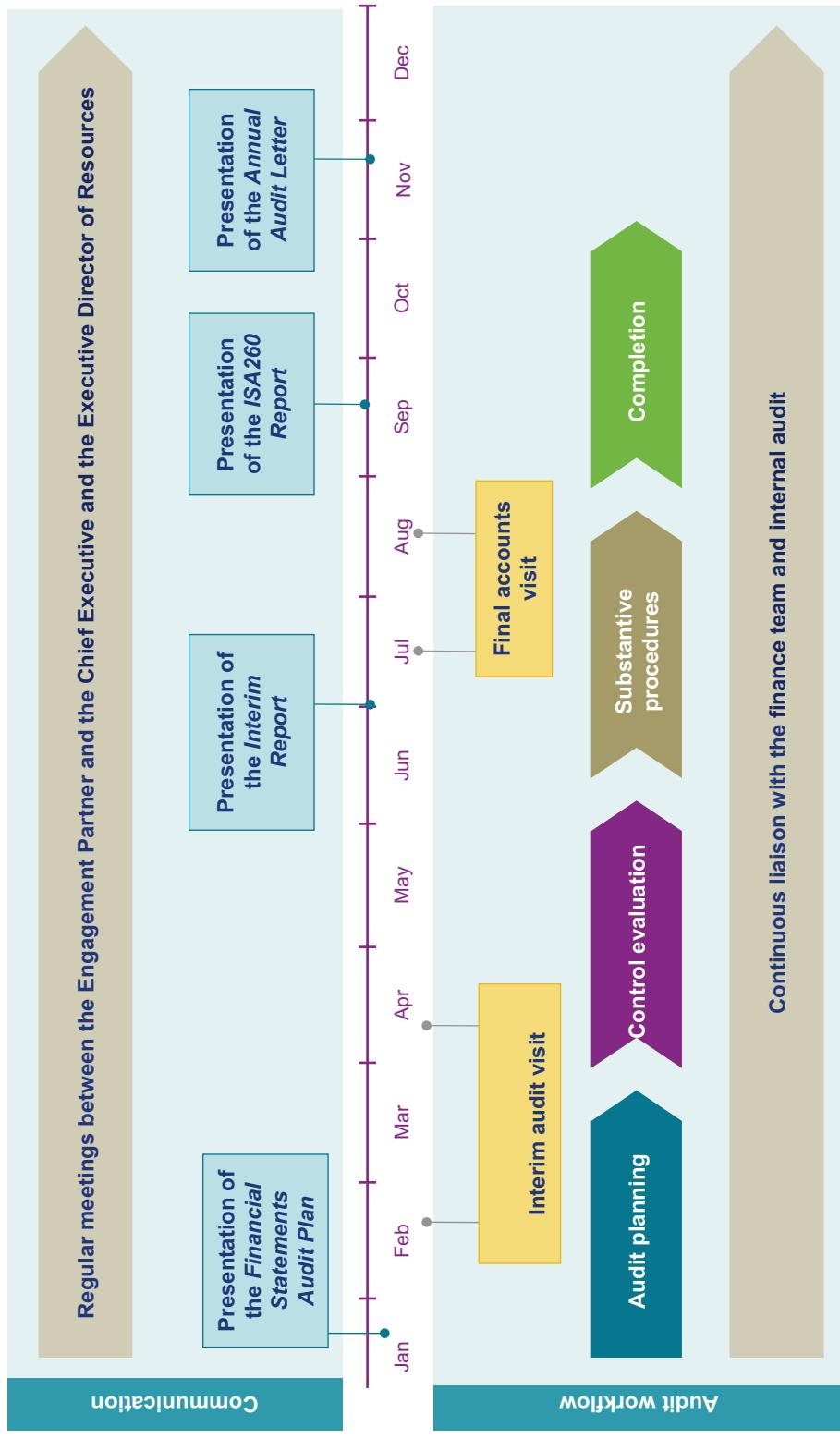
- January – Financial Statements Audit Plan;
- June – Interim Report;
- September – ISA 260 Page 38
- November – Annual Audit Letter.

We work with the finance team and internal audit throughout the year.

Our main work on site will be our:

- Interim audit visits during February and March.
- Final accounts audit during July and August.

Key: ● Audit Committee meetings.



**The main fee for 2012/13**

**audit of the Authority is £247,860. The fee has not changed from that set out in our Audit Fee Letter 2012/13 issued in August 2012.**

**Our audit fee remains indicative and based on you meeting our expectations of your support.**

**Putting these expectations where help the delivery of our audit within the proposed audit fee.**

**Audit fee**

Our *Audit Fee Letter 2012/13* issued in August 2012 first set out our fees for the 2012/13 audit. We have not considered it necessary to make any changes to the agreed fees at this stage.

Element of the audit	2012/13 (planned)	2011/12 (actual)
Gross audit fee	£247,860	£413,100
Less: Audit Commission rebate	N/A	-£33,048
<b>Total</b>	<b>£247,860</b>	<b>£380,052</b>

Our audit fee includes our work on the VFM conclusion and our audit of the Council's financial statements. The fee for 2012/13 is £247,860. This is a reduction of 40 percent compared to the 2011/12 gross fee.

**Audit fee assumptions**

The fee is based on a number of assumptions, including that you will provide us with complete and materially accurate financial statements, with good quality supporting working papers, within agreed timeframes. It is imperative that you achieve this. If this is not the case and we have to complete more work than was envisaged, we will need to charge additional fees for this work. In setting the fee, we have assumed:

- the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2011/12;
- you will inform us of any significant developments impacting on our audit;
- you will identify and implement any changes required under the CIPFA Code of Practice on Local Authority Accounting in the UK 2012/13 within your 2012/13 financial statements;
- you will comply with the expectations set out in our *Accounts Audit Protocol*, including:
  - the financial statements are made available for audit in line with the agreed timescales;

- good quality working papers and records will be provided at the start of the final accounts audit;
- requested information will be provided within the agreed timescales;
- prompt responses will be provided to queries and draft reports;
- internal audit meets appropriate professional standards;
- internal audit adheres to our joint working protocol and completes appropriate work on all systems that provide material figures for the financial statements and we can place reliance on them for our audit; and
- additional work will not be required to address questions or objections raised by local government electors.

Meeting these expectations will help ensure the delivery of our audit within the agreed audit fee.

The Audit Commission requires us to inform you of specific actions you could take to keep the audit fee low. Future audit fees can be kept to a minimum if the Authority continues to achieve an efficient and well-controlled financial closedown and accounts production process which complies with good practice and appropriately addresses new accounting developments and risk areas.

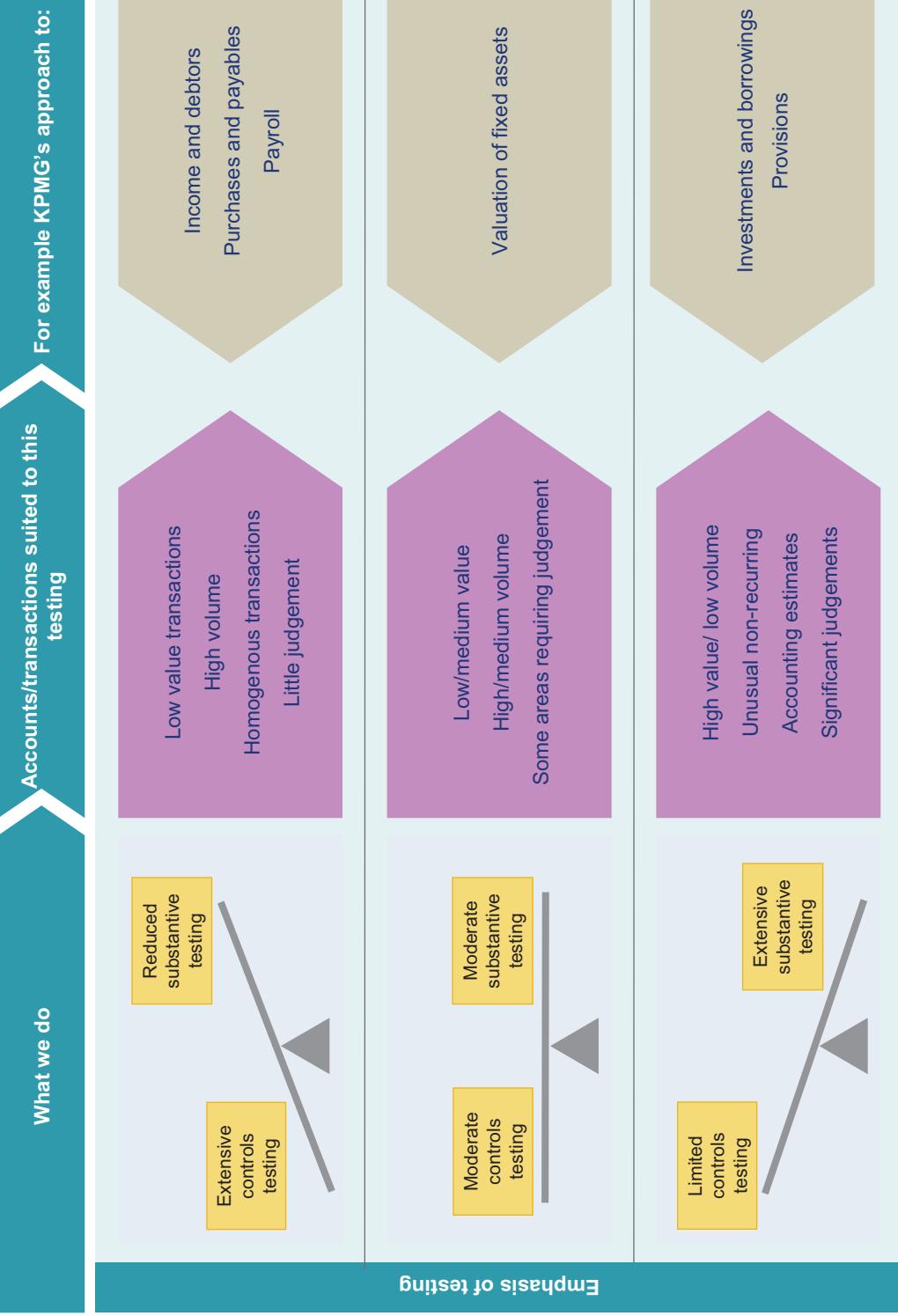
**Changes to the audit plan**

- Changes to this plan and the audit fee may be necessary if:
- new significant audit risks emerge;
  - additional work is required of us by the Audit Commission or other regulators; and
  - additional work is required as a result of changes in legislation, professional standards or financial reporting requirements.
- If changes to this plan and the audit fee are required, we will discuss and agree these initially with the Director of Finance.

## Appendices

### Appendix 1: Balance of internal controls and substantive testing

This appendix illustrates how we determine the most effective balance of internal controls and substantive audit testing.



**This appendix summarises auditors' responsibilities regarding independence and objectivity.**

- **Independence and objectivity**
  - Auditors are required by the Code to:
    - carry out their work with independence and objectivity;
    - exercise their professional judgement and act independently of both the Commission and the audited body;
    - maintain an objective attitude at all times and not act in any way that might give rise to, or be perceived to give rise to, a conflict of interest; and
    - resist any improper attempt to influence their judgement in the conduct of the audit.
- In addition, the Code specifies that auditors should not carry out work for an audited body that does not relate directly to the discharge of the auditors' functions under the Code. If the Authority invites us to carry out risk-based work in a particular area, which cannot otherwise be justified to support our audit conclusions, it will be clearly differentiated as work carried out under section 35 of the Audit Commission Act 1998.
- The Code also states that the Commission issues guidance under its powers to appoint auditors and to determine their terms of appointment. The Standing Guidance for Auditors includes several references to arrangements designed to support and reinforce the requirements relating to independence, which auditors must comply with. These are as follows:
  - Any staff involved on Commission work who wish to engage in political activity should obtain prior approval from the Partner.
  - Audit staff are expected not to accept appointments as lay school inspectors.
  - Firms are expected not to risk damaging working relationships by bidding for work within an audited body's area in direct competition with the body's own staff without having discussed and agreed a local protocol with the body concerned.

## Appendix 3: 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**  
4

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.

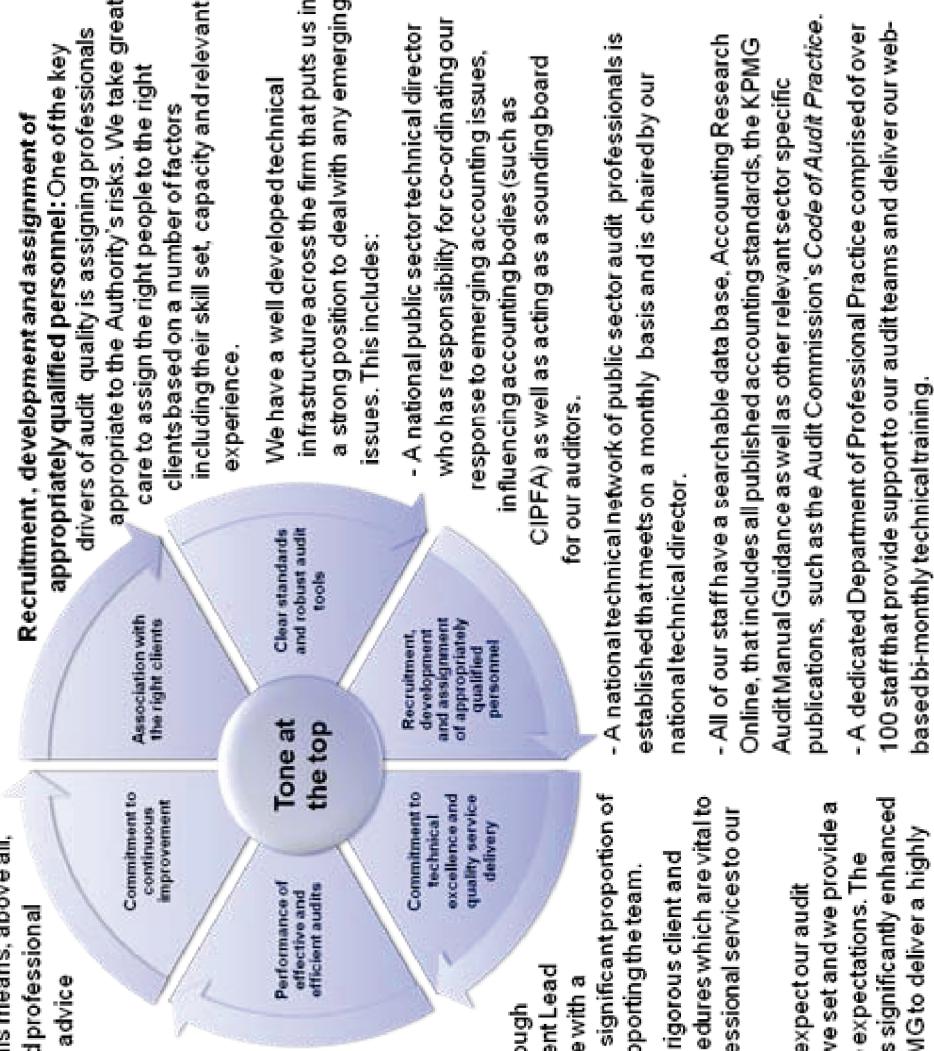
KPMG's Audit Quality Framework consists of seven key drivers combined with the commitment of each individual in KPMG. We use our seven drivers of audit quality to articulate what audit quality means to KPMG. We believe it is important to be transparent about the processes that sit behind a KPMG audit 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 drivers of quality through a focused and consistent voice. 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 their time throughout the audit directing and supporting the team.

**Association with right clients:** We undertake rigorous client and engagement acceptance and continue 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.



## Appendix 3: 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.

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

Page 4

Quality

**Commitment to technical excellence and quality service delivery:**  
Our professionals bring you up-to-the-minute and accurate technical solutions and together with our specialists are capable of solving complex audit issues and delivering valuable 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. I

**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 behaviours in the performance of effective and efficient audits. The key behaviours 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

We are able to evidence the quality of our audits through the results of National Audit Office and Audit Commission reviews. The results of the Audit Commission's annual quality review process is made publicly available each year (<http://www.audit-commission.gov.uk/audit-regime/Pages/qualityreviewprocess.aspx>). The latest report dated October 2012 showed that we performed highly against all the Commission's criteria.



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# **Proposed work programme and scales of fees 2013/14**

**Local government and police bodies**

**December 2012**



**The Audit Commission's role is to protect the public purse.**

**We do this by appointing auditors to a range of local public bodies in England. We set the standards we expect auditors to meet and oversee their work. Our aim is to secure high-quality audits at the best price possible.**

**We use information from auditors and published data to provide authoritative, evidence-based analysis. This helps local public services to learn from one another and manage the financial challenges they face.**

**We also compare data across the public sector to identify where services could be open to abuse and help organisations fight fraud.**

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# Introduction

**1** This consultation document sets out the work the Audit Commission plans to undertake at local government and police audited bodies during 2013/14, with the associated [scales of audit fees](#). A separate consultation document covers the Commission's [work programme and scales of fees at NHS bodies](#).

**2** The consultation does not cover small bodies subject to the limited assurance regime. Fee scales for small bodies were set in April 2012 for five years and are available on the [Commission's website](#).

**3** We hope the information set out in this document is helpful to stakeholders in considering our proposals for the 2013/14 work programme and scale fees, as well as supporting audited bodies' financial planning.

## Background

**4** In March 2012, the Commission announced significant reductions of up to 40 per cent in audit and certification fees from 2012/13 onwards, following an exercise to outsource the work of its in-house audit practice. These fee reductions were achieved as a combined result of the Commission's bulk purchasing power and internal efficiency savings.

**5** When we announced the reductions, we said that we expect these lower fees to apply for five years, from 2012/13 to 2016/17, subject to annual review.

**6** We plan to publish the final work programme and scales of fees for 2013/14 in April 2013. We have a statutory duty to consult before prescribing a scale of fees, and consult audited bodies themselves, where possible, as well as their representative associations, relevant government departments and the accountancy profession.

## 2013/14 fees

**7** We do not plan to make any changes to the work programme for local government audited bodies for 2013/14. We therefore propose that scale audit fees are set at the same level as the fees applicable for 2012/13.

**8** Fees for police bodies for 2012/13 reflected the increase in audit work arising from the changes introduced by the Police Reform and Social Responsibility Act 2011, requiring auditors to undertake audits of two statutory bodies in a police area from 2012/13, rather than one.

**9** The 2012/13 overall fee for each police area, covering the audit of the police and crime commissioner and the chief constable, included an element for auditors' work on financial reporting requirements for the

transition from police authorities. We intend to remove this element for 2013/14, reducing the fee for the police and crime commissioner by a further 7 per cent.

**10** We will keep the scales of fees for the new police bodies under review, to ensure they are consistent with auditors' local assessment of audit risks.

**11** The Commission may approve variations to published scale fees for individual audited bodies, to reflect changes in circumstances or audit risks. These variations will apply to the fees for 2013/14 where the matter leading to the variation is of an ongoing nature.

## Fees beyond 2013/14

**12** We have made a commitment to review scales of audit fees each year, with the expectation that the significant audit fee reductions introduced from 2012/13 will apply until 2016/17. We expect to consult each year on the work programme and scales of fees before confirming fees.

**13** The Commission has reduced significantly in size, but will continue to oversee the contracts with audit suppliers and make auditor appointments.

**14** Draft legislation published by the government in July 2012 proposes closing the Commission by April 2015. The Commission's contracts with audit suppliers run until 2016/17, with a possibility of extension for up to three years. The responsibility for overseeing these contracts is expected to pass to a residuary body from April 2015.

## Responding to this consultation

**15** We welcome comments from stakeholders on the proposals contained in this document. Please send comments by email to [workandfeesconsultation@audit-commission.gov.uk](mailto:workandfeesconsultation@audit-commission.gov.uk) or to Jon Hayes, Associate Controller of Audit (Compliance), at the following address by **Friday 8 February 2013**:

Audit Commission  
1st Floor Millbank Tower  
Millbank  
London  
SW1P 4HQ

# Proposed work programme for 2013/14

## Audit

**16** Auditors tailor their work to reflect local circumstances and their assessment of audit risk. They do this by assessing the significant financial and operational risks facing the body, and the arrangements it has put in place to manage those risks.

**17** Under the *Code of Audit Practice* (the Code), the Commission may specify additional audit work which supplements the local risk-based approach to planning the audit. For 2013/14, the Commission will specify work on Whole of Government Accounts (WGA).

## National reports

**18** In 2013/14, the Commission will again publish a national report on the results of auditors' work. The report will cover the timeliness and quality of financial reporting and will summarise:

- auditors' work on the financial statements;
- auditors' work on the WGA returns;
- auditors' local value for money work;
- the public interest reports and statutory recommendations issued by auditors; and
- the key financial reporting and financial management challenges facing bodies.

**19** The report will cover local authorities, fire and rescue authorities, local police bodies, other local government bodies, internal drainage boards and parish councils.

**20** The Commission will also continue to publish the results of the annual survey of fraud in local government, in its *Protecting the Public Purse* report.

## Auditors' local value for money work

**21** Under the Audit Commission Act 1998, auditors must satisfy themselves about an audited body's arrangements to secure economy, efficiency and effectiveness in its use of resources (the value for money conclusion).

**22** Auditors of single-tier, county and district councils, fire and rescue authorities and police bodies will apply a risk-based approach to their local value for money (VFM) work, giving a conclusion on the arrangements in place. The approach is based on two criteria, specified by the Commission:

- securing financial resilience; and
- prioritising resources within tighter budgets.

**23** Auditors of larger national parks authorities, waste disposal authorities, integrated transport authorities, passenger transport executives, joint committees, and other miscellaneous local government bodies will continue to apply a tailored approach to their local VFM work. The approach is based primarily on review of the annual governance statement, and any other specific work the auditor considers necessary.

**24** A VFM conclusion is not required for audited bodies with annual income or expenditure of less than £6.5 million, which are subject to limited assurance audit. This is in line with the threshold set in the Accounts and Audit (England) Regulations 2011 defining smaller relevant bodies.

**25** Where a body with annual income or expenditure of less than £6.5 million elects to prepare accounts as a larger relevant body, it is subject to a full Code audit including a VFM conclusion.

**26** Our website provides further [information about the VFM conclusion](#).

## Certification work

**27** As well as their work under the Code, appointed auditors, as agents of the Commission, certify certain claims and returns.

**28** In 2013/14, we will not ask auditors to certify individual claims and returns below £125,000. The threshold below which auditors will undertake only limited tests will remain at £500,000. Above this threshold, certification work takes account of the authority's overall control environment for preparing the claim or return.

## Assessment and inspection work

**29** Following the end of Comprehensive Area Assessment in May 2010, there is no longer any programme of mandatory inspection work. We do not envisage carrying out any inspections in 2013/14, unless specifically directed to do so.

# Proposed scales of fees for 2013/14

## Scales of audit fees for local government, police, and fire and rescue bodies

**30** We have reflected the cost of the work programme in the proposed scales of fees for 2013/14. The fees are based on the scale fees applicable for 2012/13.

**31** The proposed 2013/14 scale fee for each [local government](#) and [police](#) audited body is available on our website.

**32** The Commission has the power to determine the fee above or below the scale fee, where it considers that substantially more or less work was required than envisaged by the scale fee. The scale fees are based on the expectation that audited bodies are able to provide the auditor with complete and materially accurate financial statements, with supporting working papers, within agreed timeframes.

**33** As the 2013/14 scale fees are based on the scale fee for 2012/13, they continue to reflect the auditor's assessment of audit risk and complexity. We would only expect variations from the scale fee to occur in 2013/14 where these factors are significantly different from those identified and reflected in the 2012/13 fee.

**34** The Commission can approve proposed variations to the scale fee, to reflect changes in circumstances, before or at the completion of the 2013/14 audit.

**35** We will keep the scales of fees for the new police bodies that have replaced police authorities under review to ensure they are consistent with auditors' local assessment of audit risks.

**36** The Commission will obtain updated fee information from appointed auditors, and explanations for any proposed variations from the scale fee on a regular basis. The Commission will consider the reasonableness of the explanations provided by auditors before agreeing to any variation to the scale fee.

**37** The Commission will charge fees for considering objections, from the point at which auditors accept an objection as valid, or any special investigations, such as those arising from disclosures under the Public Interest Disclosure Act 1998, as a variation to the scale fee.

## Pension fund audits

**38** The proposed scale fees for 2013/14 pension fund audits are the scale fees applicable for 2012/13. In line with the scale audit fees for all audited

bodies, we expect these lower fees to apply for five years, from 2012/13 to 2016/17, subject to annual review.

**39** The proposed [2013/14 pension fund audit scale fee for each relevant audited body](#) is available on our website.

## Certification work

**40** The Audit Commission Act 1998 requires the Commission to charge fees for certification work that cover the full cost of the work.

**41** Certification work fees for 2013/14 will comprise a composite indicative fee for each body, based on the latest certification fees, for 2011/12. Indicative fees will be adjusted for schemes no longer requiring auditor certification.

**42** The Commission will receive final fee information from appointed auditors for 2011/12 certification work in January 2013. Where the work required to complete certification is above or below the indicative fee level set for 2012/13, we will revise 2013/14 indicative certification fees accordingly.

**43** As the 2013/14 composite indicative fee is based on the latest certification fees available, it reflects the auditors' assessment of the work required. Therefore, we expect variations from the composite indicative fee to occur only where issues arise that are significantly different from those identified and reflected in the actual 2011/12 fee.

**44** The indicative fees for certification work are based on the expectation that audited bodies are able to provide the auditor with complete and materially accurate claims and returns, with supporting working papers, within agreed timeframes.

**45** The draft [2013/14 composite indicative certification fee](#) for each individual audited body is available on our website.

## Inspection fees for local government bodies

**46** We do not plan to undertake any inspections in 2013/14. Any risk-based inspections we are specifically directed to undertake will be charged on the basis of the fees set for 2010/11. This was the last year in which we undertook a planned programme of inspections. [The 2010/11 fees](#) are available on our website.

## Value added tax

**47** All the 2013/14 fee scales exclude value added tax (VAT), which will be charged at the prevailing rate of 20 per cent on all work done.

## Next steps

**48** Under section 7 of the Audit Commission Act, the Commission has a statutory duty to prescribe scales of fees for the audit of accounts. Before prescribing scales of fees, the Commission is required to consult relevant representative organisations.

**49** We welcome comments from stakeholders on the proposals contained in this document. Please send comments by email to [workandfeesconsultation@audit-commission.gov.uk](mailto:workandfeesconsultation@audit-commission.gov.uk) or to Jon Hayes, Associate Controller of Audit (Compliance), at the following address by **Friday 8 February 2013:**

Audit Commission  
1st Floor Millbank Tower  
Millbank  
London  
SW1P 4HQ

**50** Following responses to this consultation, the Commission's Board will approve the final 2013/14 work programme and scales of fees in March 2013, for publication in April 2013.

**51** If you have comments or complaints about the way this consultation has been conducted, these should be sent by email to [complaints@audit-commission.gov.uk](mailto:complaints@audit-commission.gov.uk).