

Informing the audit risk assessment for West Devon Borough Council 2020/21

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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect your business or any weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

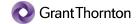
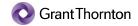


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Purpose

The purpose of this report is to contribute towards the effective two-way communication between West Devon Borough Council's external auditors and West Devon Borough Council's Audit Committee, as 'those charged with governance'. The report covers some important areas of the auditor risk assessment where we are required to make inquiries of the Audit Committee under auditing standards.

Background

Under International Standards on Auditing (UK), (ISA(UK)) auditors have specific responsibilities to communicate with the Audit Committee. ISA(UK) emphasise the importance of two-way communication between the auditor and the Audit Committee and also specify matters that should be communicated.

This two-way communication assists both the auditor and the Audit Committee in understanding matters relating to the audit and developing a constructive working relationship. It also enables the auditor to obtain information relevant to the audit from the Audit Committee and supports the Audit Committee in fulfilling its responsibilities in relation to the financial reporting process.

Communication

As part of our risk assessment procedures we are required to obtain an understanding of management processes and the Council's oversight of the following areas:

- general enquiries of management
- fraud,
- · laws and regulations,
- related parties, and
- accounting estimates.

This report includes a series of questions on each of these areas and the response we have received from South Ham District Council's management. The Audit Committee should consider whether these responses are consistent with its understanding and whether there are any further comments it wishes to make.

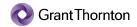
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General Enquiries of Management

Question	Management response
1. What do you regard as the key events or issues that will have a significant impact on the financial statements for 2020/21?	The Covid pandemic became prevalent in March 2020, near the year end date. This has had an impact on Fixed Asset Valuations with a Material Uncertainty shown in Note 1 'Assumptions made about the future and other major sources of estimation uncertainty' of the 2019/20 Accounts.
	The Council has four Investment Properties.
	The Council set an Amended Budget part way through the year for 2020/21 and has received various sources of COVID funding and specific grants. The Council has also administered Business Grants to businesses during the year which has totalled £25 million to date. Treatment of COVID grants received.
2. Have you considered the appropriateness of the accounting policies adopted by West Devon Borough Council?Have there been any events or transactions that may cause you to change or adopt new accounting policies?	Yes the appropriateness has been considered – they are considered appropriate. No
3. Is there any use of financial instruments, including derivatives?	A summary of Financial Instruments carried on the Balance Sheet are shown in Note 14 to the Accounts. The Council has a £0.5m Investment with the CCLA Property Fund.
4. Are you aware of any significant transaction outside the normal course of business? 5	No – see comments in Section 1 about the Covid pandemic in general. Extra work carried out in relation to Covid19 and issuing grants, receiving funding for significant income losses etc.

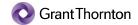
General Enquiries of Management

Question	Management response
5. Are you aware of any changes in circumstances that would lead to impairment of non-current assets?	No – see comments about Material Uncertainty due to the Covid 19 pandemic
6. Are you aware of any guarantee contracts?	No. The main two contracts the Council has is for the delivery of waste services with FCC and for the delivery of leisure services with Fusion Leisure.
7. Are you aware of the existence of loss contingencies and/or un-asserted claims that may affect the financial statements?	No
8. Other than in house solicitors, can you provide details of those solicitors utilised by West Devon Borough Council during the year. Please indicate where they are working on open litigation or contingencies from prior years?	Yes – a list will be provided at the end of the year when the ledger is closed. There are no known contingencies from previous years being worked on.



General Enquiries of Management

Question	Management response
9. Have any of West Devon Borough Council's service providers reported any items of fraud, non-compliance with laws and regulations or uncorrected misstatements which would affect the financial statements?	Νο
10. Can you provide details of other advisors consulted during the year and the issue on which they were consulted?	Link Services have advised on Treasury Management advice for the year Local Government Futures have given advice to the Devon Business Rates Pool on the decision to continue to pool for 2021/22. A list will be provided at the end of the year when the ledger is closed.



Fraud

Issue

Matters in relation to fraud

ISA (UK) 240 covers auditors responsibilities relating to fraud in an audit of financial statements.

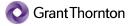
The primary responsibility to prevent and detect fraud rests with both the Audit Committee and management. Management, with the oversight of the Audit Committee, needs to ensure a strong emphasis on fraud prevention and deterrence and encourage a culture of honest and ethical behaviour. As part of its oversight, the Audit Committee should consider the potential for override of controls and inappropriate influence over the financial reporting process.

As West Devon Borough Council's external auditor, we are responsible for obtaining reasonable assurance that the financial statements are free from material misstatement due to fraud or error. We are required to maintain professional scepticism throughout the audit, considering the potential for management override of controls.

As part of our audit risk assessment procedures we are required to consider risks of fraud. This includes considering the arrangements management has put in place with regard to fraud risks including:

- · assessment that the financial statements could be materially misstated due to fraud,
- · process for identifying and responding to risks of fraud, including any identified specific risks,
- communication with the Audit Committee regarding its processes for identifying and responding to risks of fraud, and
- communication to employees regarding business practices and ethical behaviour.

We need to understand how the Audit Committee oversees the above processes. We are also required to make inquiries of both management and the Audit Committee as to their knowledge of any actual, suspected or alleged fraud. These areas have been set out in the fraud risk assessment questions below together with responses from West Devon Borough Council's management.



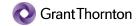
Question	Management response
 Have West Devon Borough Council assessed the risk of material misstatement in the financial statements due to fraud? How has the process of identifying and responding to the risk of fraud been undertaken and what are the results of this process? How do West Devon Borough Council's risk management processes link to financial reporting? 	reporting the risk of fraud and possible breaches of internal control for West Devon Borough Council. This is done through the following: <i>Anti Fraud, Corruption and Bribery Policy and Strategy, and Anti-Money Laundering Policy:</i> The Audit Committee considers and recommends to Council the approval of the Council's policies and zero tolerance position in relation to fraud and money laundering and monitors their use and any actions required to improve the control environment following alleged breaches. <i>The System of Internal Audit:</i> as described below, related reports to the Audit Committee include breaches of internal control and the Council's related Rules; Contract and Financial Procedure Rules as well as information on alleged fraud. The Senior Leadership Team consider it to be unlikely that the financial statements are materially misstated due to fraud. 6 monthly reports on risk management are presented to the Council's Audit Committee. The risk
	management matrix used makes an assessment of the financial impact and the scoring is based on a range of financial impacts.
2. What have you determined to be the classes of accounts, transactions and disclosures most at risk to fraud?	The area most at risk of Fraud is Housing Benefit Fraud and fraud of the Business Grants administered by the Council.



Question	Management response
 3. Are you aware of any instances of actual, suspected or alleged fraud, errors or other irregularities either within West Devon Borough Council as a whole or within specific departments since 1 April 2020? As a management team, how do you communicate risk issues (including fraud) to those charged with governance? 	Not within the Council or within Council departments. Fraud risk assessments have been completed for the administration of Business Grants during the year. Any suspected fraud has been reported and investigated through the Devon Audit Partnership.
4. Have you identified any specific fraud risks?Do you have any concerns there are areas that are at risk of fraud?Are there particular locations within West Devon Borough Council where fraud is more likely to occur?	Please see details in 3.
5. What processes do West Devon Borough Council have in place to identify and respond to risks of fraud?	The Audit Committee receives a six monthly report on strategic risks. The Audit Committee also receives an annual report from the Statutory Officers' Panel (consisting of the Chief Executive, the S151 Officer and the Monitoring Officer) and one of the areas considered is Fraud. The Internal Audit Manager also reports on Fraud as part of his annual internal report to the Audit Committee. Fraud risk assessments have been completed for the administration of Business Grants during the year. Any suspected fraud has been reported and investigated through the Devon Audit Partnership.

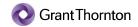


Question	Management response
6. How do you assess the overall control environment for West Devon Borough Council, including:	The Internal Control environment is reported on quarterly to the Audit Committee as part of the regular reporting of the Internal Audit Manager.
 the existence of internal controls, including segregation of duties; and the process for reviewing the effectiveness the system of internal control? 	A 'follow up' report is done on all internal audits on an annual basis also.
If internal controls are not in place or not effective where are the risk areas and what mitigating actions have been taken?	Housing Benefit fraud and Business Grants fraud are the highest risk areas.
What other controls are in place to help prevent, deter or detect fraud? Are there any areas where there is a potential for override of controls or inappropriate influence over the financial reporting process (for example because of undue pressure to achieve financial targets)?	Post payment assurance reporting for business grants. Preventive controls are designed into systems to help stop fraud at the gateway for application processes. Reconciliations, segregation of duties, formal schemes of delegation and authorisation are in place for financial transactions. Compensating controls such as counter fraud measures. See above None known of.
7. Are there any areas where there is potential for misreporting?	None known of to the S151 Officer



Question	Management response
8. How do West Devon Borough Council communicate and encourage ethical behaviours and business processes of it's staff and contractors?	The Anti Fraud, Corruption and Bribery arrangements, whistle blowing policy and other ethical standards are publicised throughout the Council and to a wider audience outside through training, leaflets, the internal computer network and the Council's website etc.
How do you encourage staff to report their concerns about fraud? What concerns are staff expected to report about fraud?	Reliance is placed on the process and the Council's Constitution, which includes the following: After consulting with the Head of Paid Service and the Monitoring Officer, the Section 151 Officer will report to the full Council and the Council's external auditor if it is considered that any proposal, decision or course of action will involve incurring unlawful expenditure, or is unlawful and is likely to cause a loss or deficiency or if the Council is about to enter an item of account unlawfully;
Have any significant issues been reported?	After consulting with the Head of Paid Service and Section 151 Officer, the Monitoring Officer will report to the Full Council if it is considered that any proposal, decision or omission would give rise to unlawfulness or if any decision or omission has given rise to maladministration. Such a report will have the effect of stopping the proposal or decision being implemented until the report has been considered.
	There are processes in place to provide members of the Audit Committee, and other member bodies, with the assurance that when considering agenda items all relevant laws have been complied with, which includes:
	A formal system of consultation for all reports to member bodies, which includes advice on the legal implications from qualified solicitors and advice on financial implications by qualified accountants;
	The S151 Officer is not aware of any significant issues raised. Suspected fraud on business grants has been reported to the Devon Audit Partnership to investigate.
	All staff are recruited and regularly assessed against the Council's six IMPACT behaviours of Communicative, Responsible, Adaptable, Challenging, Co-operative and Outcome Focussed.
12	
9 From a fraud and corruntion perspective what	All 5 nosts within the Senior Leadershin Team - being the Chief Executive, the Deputy Chief Executive

Question	Management response
11. What arrangements are in place to report fraud issues and risks to the Audit Committee?	The Audit Committee exercises overview of management's processes for identifying and reporting the risk of fraud and possible breaches of internal control for the Council. This is done through the following:
How does the Audit Committee exercise oversight over management's processes for identifying and responding to risks of fraud and breaches of internal control?	Anti Fraud, Corruption and Bribery Policy and Strategy, and Anti-Money Laundering Policy: The Audit Committee considers and recommends to Council the approval of the Council's policies and zero tolerance position in relation to fraud and money laundering and monitors their use and any actions required to improve the control environment following alleged breaches. The System of Internal Audit: related reports to the Audit Committee include breaches of internal control
What has been the outcome of these arrangements so far this year?	and the Council's related Rules; Contract and Financial Procedure Rules as well as information on alleged fraud. No significant fraud issues have been identified to date.
12. Are you aware of any whistle blowing potential or complaints by potential whistle blowers? If so, what has been your response?	The S151 Officer is not aware of any.
13. Have any reports been made under the Bribery Act?	No.



Law and regulations

Issue

Matters in relation to laws and regulations

ISA (UK) 250 requires us to consider the impact of laws and regulations in an audit of the financial statements.

Management, with the oversight of the Audit Committee, is responsible for ensuring that West Devon Borough Council's operations are conducted in accordance with laws and regulations including those that determine amounts in the financial statements.

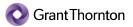
As auditor, we are responsible for obtaining reasonable assurance that the financial statements are free from material misstatement due to fraud or error, taking into account the appropriate legal and regulatory framework. As part of our risk assessment procedures we are required to make inquiries of management and the Audit Committee as to whether the entity is in compliance with laws and regulations. Where we become aware of information of non-compliance or suspected non-compliance we need to gain an understanding of the non-compliance and the possible effect on the financial statements.

Risk assessment questions have been set out below together with responses from management.



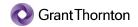
Impact of laws and regulations

Question	Management response
1. How does management gain assurance that all relevant laws and regulations have been complied with?	Every Committee and Council report has to state the legal implications of the report and state the legal powers that are being used to make a decision.
What arrangements does West Devon Borough Council have in place to prevent and detect non-compliance with laws and regulations?	The Monitoring Officer and the S151 Officer review all reports that are published and reports are 'signed off' by these Statutory Officers.
Are you aware of any changes to West Devon Borough	Annual Governance process certifies that statutory obligations for the services managers are responsible for, have been understood and fulfilled.
Council's regulatory environment that may have a significant impact on the Council's financial statements?	No – see comments about how Covid19 will affect valuations and a Material Valuation Uncertainty being given.
2. How is the Audit Committee provided with assurance that all relevant laws and regulations have been complied with?	The Audit Committee receives a quarterly confirmation that there is no significant breach of law or internal rules. Internal Audit reports, annual assurance opinion and results of the annual governance review process.
3. Have there been any instances of non-compliance or suspected non-compliance with laws and regulation since 1 April 2020 with an on-going impact on the 2020/21 financial statements?	No
4. Is there any actual or potential litigation or claims that would affect the financial statements?	No material claims known of. This position will be reviewed and confirmed at 31/3/2021.



Impact of laws and regulations

Question	Management response
5. What arrangements does West Devon Borough Council have in place to identify, evaluate and account for litigation or claims?	The S151 Officer and Monitoring Officer have regular meetings with the Chief Executive where any such items would be discussed. None known of.
6. Have there been any report from other regulatory bodies, such as HM Revenues and Customs which indicate non-compliance?	No – None known of.



Related Parties

Issue

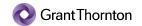
Matters in relation to Related Parties

West Devon Borough Council are required to disclose transactions with entities/individuals that would be classed as related parties. These may include:

- entities that directly, or indirectly through one or more intermediaries, control, or are controlled by West Devon Borough Council;
- associates;
- joint ventures;
- an entity that has an interest in the authority that gives it significant influence over the Council;
- key management personnel, and close members of the family of key management personnel, and
- post-employment benefit plans (pension fund) for the benefit of employees of the Council, or of any entity that is a related party of the Council.

A disclosure is required if a transaction (or series of transactions) is material on either side, i.e. if a transaction is immaterial from the Council's perspective but material from a related party viewpoint then the Council must disclose it.

ISA (UK) 550 requires us to review your procedures for identifying related party transactions and obtain an understanding of the controls that you have established to identify such transactions. We will also carry out testing to ensure the related party transaction disclosures you make in the financial statements are complete and accurate.



Related Parties

Question	Management response
 Have there been any changes in the related parties including those disclosed in West Devon Borough Council's 2020/21 financial statements? If so please summarise: the nature of the relationship between these related parties and West Devon Borough Council whether West Devon Borough Council has entered into or plans to enter into any transactions with these related parties the type and purpose of these transactions 	No – no changes
2. What controls does West Devon Borough Council have in place to identify, account for and disclose related party transactions and relationships?	All Members and all of the Senior Leadership Team are required to complete a Related Parties Return in April 2021 following the Year End. Items disclosed on these returns are reviewed by the Finance Head of Practice, to assess whether they need to be disclosed within the Financial Statements. A register of Member and Officer interests is maintained.
3. What controls are in place to authorise and approve significant transactions and arrangements with related parties?	See comments above. None known of to the S151 Officer. If this situation arose, the S151 Officer would discuss it with the Monitoring Officer and the Head of Paid Service to ensure mitigating controls were put in place. Robust procurement controls are operated with contract authorisation limits.
4. What controls are in place to authorise and approve significant transactions outside of the normal course of business? 18	See comments above. None known of to the S151 Officer. If this situation arose, the S151 Officer would discuss it with the Monitoring Officer and the Head of Paid Service to ensure mitigating controls were put in place.

Accounting estimates

Issue

Matters in relation to Related Accounting estimates

ISA (UK) 540 (Revised December 2018) requires auditors to understand and assess an entity's internal controls over accounting estimates, including:

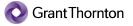
- the nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates;
- how management identifies the need for and applies specialised skills or knowledge related to accounting estimates;
- · how the entity's risk management process identifies and addresses risks relating to accounting estimates;
- the entity's information system as it relates to accounting estimates;
- · the entity's control activities in relation to accounting estimates; and
- · how management reviews the outcomes of previous accounting estimates.

As part of this process auditors also need to obtain an understanding of the role of those charged with governance, which is particularly important where the estimates have high estimation uncertainty, or require significant judgement.

Specifically do Audit Committee members:

- understand the characteristics of the methods and models used to make the accounting estimates and the risks related to them;
- oversee management's process for making accounting estimates, including the use of models, and the monitoring activities undertaken by management; and
- · evaluate how management made the accounting estimates?

We would ask the Audit Committee to satisfy itself that the arrangements for accounting estimates are adequate.



Accounting Estimates - General Enquiries of Management

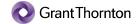
Question	Management response
1. What are the classes of transactions, events and conditions, that are significant to the financial statements that give rise to the need for, or changes in, accounting estimate and related disclosures?	There will be extra disclosure requirements this year around COVID related issues. The Council has also administered a significant amount of Business Grants on behalf of the Government. In addition, the Council has also received other Government Grants to administer. These amounts are material and will be highlighted in the relative parts of the Accounts e.g. the Collection Fund.
2. How does the Council's risk management process identify and addresses risks relating to accounting estimates?	The most significant accounting estimates are reviewed when the actual data is known, to assess the accuracy of the original estimate.
3. How do management identify the methods, assumptions or source data, and the need for changes in them, in relation to key accounting estimates?	This is done on an individual basis with respect to the key accounting estimates.
4. How do management review the outcomes of previous accounting estimates?	This forms part of the post audit review of the closedown procedure.
5. Were any changes made to the estimation processes in 2020/21 and, if so, what was the reason for these?	No changes are envisaged at this early stage of the Accounts preparation process.

Accounting Estimates - General Enquiries of Management

Management response
This is a judgement which is made on an individual basis e.g. bad debt provisions. Specialist knowledge is obtained where needed from experienced external advisers, e.g. business rates appeals. The Chief Finance Officer (S151 Officer) is a member of the Strategic Leadership Team (SLT). The finance team have knowledge acquired through professional qualifications or training.
The Chief Finance Officer considers these as part of their materiality assessment and also as part of dialogue with the Legal department in relation to any claims. Internal audit reports are considered where they report on any relevant control weaknesses.
^I Through the monthly budget monitoring exercise carried out and monthly reporting of financial data.
 Financial monitoring reports are presented to the Senior Leadership Team/Hub Committee and Audit Committee and any challenge is made on assumptions. Through the budget monitoring process, the Finance team consider the robustness of estimates and challenges these. Members of the Extended Leadership Team (ELT) and service managers provide updates if material on any significant developments and data provided from the debt recovery process.

Accounting Estimates - General Enquiries of Management

Question	Management response
10. Are management aware of transactions, events, conditions (or changes in these) that may give rise to recognition or disclosure of significant accounting estimates that require significant judgement (other than those in Appendix A)?	Business rates appeals.
11. Are the management arrangements for the accounting estimates, as detailed in Appendix A reasonable?	Yes
12. How is the Audit Committee provided with assurance that the arrangements for accounting estimates are adequate ?	Through the collation and approval of the annual accounts and accounting policies.

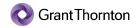


Appendix A Accounting Estimates

Estimate	Method / model used to make the estimate	Controls used to identify estimates	Whether Management have used an expert	Underlying assumptions: - Assessment of degree of uncertainty - Consideration of alternative estimates	Has there been a change in accounting method in year?
Land and buildings valuations	Use of internal qualified valuers.	Valuations are performed annually to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. For land and buildings all material assets will be considered in 2020/21.	In house valuers	Degree of uncertainty inherent with any revaluation. We employ professional valuers and rely on expert opinion. Valuers look at in terms of materiality, RICS and accounting guidance. All material freehold land and buildings, which comprise the Council's property portfolio, are revalued by the Council's Valuer on a five year rolling programme.	No
Investment property valuations	Use of external qualified valuers. Measured annually at Fair Value.	Valuations are performed annually	External valuations where appropriate	Degree of uncertainty inherent with any revaluation. Valuers look at in terms of materiality, RICS and accounting guidance.	No
Depreciation and estimated remaining useful ₂₃ lives	Each part of an item of property, plant and equipment with a significant cost in relation to the total cost is depreciated separately.	See left box	Discussion with internal asset team and where applicable the Council as the valuer	Depreciation is calculated on a straight line basis as this reflects consumption of assets and is a reasonable assumption.	No

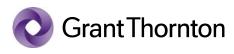
Estimate	Method / model used to make the estimate	Controls used to identify estimates	Whether Management have used an expert	Underlying assumptions: - Assessment of degree of uncertainty - Consideration of alternative estimates	Has there been a change in accounting method in year?
Valuation of defined benefit net pension fund liabilities	Staff are members of the Local Government Pension Scheme (LGPS), administered by the Devon County Council Pension Fund.	The Council responds to queries raised by the actuaries and the administering body. Rely on calculations made by the actuary. Challenge any unusual movements or assumptions with the actuary.	The Council is provided with an actuarial report by the Pension actuaries.	The nature of these figures forecasting into the future are based upon the best information held at the current time and are developed by experts in their field.	No
Measurement of financial instruments including fair value estimates	Financial instruments are valued at fair value based on the advice of external treasury consultants and investment fund managers.	All financial instruments are reviewed at the year end and advice taken from professional advisors.	Yes	Instruments are valued on an individual basis with advice from treasury management professionals and investment fund managers.	No

Appendix A Accounting Estimates



Estimate	Method / model used to make the estimate	Controls used to identify estimates	Whether Management have used an expert	Underlying assumptions: - Assessment of degree of uncertainty - Consideration of alternative estimates	Has there been a change in accounting method in year?
Provisions	Method depends on the provision type – e.g. bad debt provisions are based on an aged debt analysis	Each provision is separately reviewed by an accountant and a working paper is put together to support the calculation.	As necessary on an individual basis	Each provision is assessed on an individual basis to ensure that it meets the criteria of a provision per IAS 37. The degree of uncertainty is assessed when determining whether a provision is the correct treatment for an item.	No
Accruals	We use standard accruals accounting –accruals are based on expenses incurred that have not yet been paid.	Regular budget monitoring provides rigorous analysis so that any accruals are highlighted and actioned throughout the year.	N/A	We use standard accruals accounting – accruals are based on expenses incurred that have not yet been paid. Accruals for income and expenditure have been principally based on known values. Where accruals have been estimated, the latest available information has been used. Review of the financial ledger line by line for variances.	No
Credit loss and impairment allowances	Review of all assets undertaken annually to assess whether there is any indication that an asset may be impaired.	See left	Discussion with the Council's Assets team	Where indications exist and any possible differences are estimated to be material, the recoverable amount of the asset is estimated and where this is less than the carrying amount of the asset, an impairment loss is recognised for the shortfall.	No

Appendix A Accounting Estimates



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