

Report to the Joint Audit Committee

**POLICE AND CRIME COMMISSIONER  
CAMBRIDGESHIRE AND PETERBOROUGH /  
THE CHIEF CONSTABLE OF CAMBRIDGESHIRE  
CONSTABULARY**

Audit Planning Report: year ended 31 March 2021

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# WELCOME

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We have pleasure in presenting our Audit Planning Report to the Joint Audit Committee of the Police and Crime Commissioner Cambridgeshire and Peterborough (the “PCC”) and the Chief Constable for Cambridgeshire Constabulary (the “Chief Constable”). This report forms a key part of our communication strategy with you, a strategy which is designed to promote effective two way communication throughout the audit process with those charged with governance.

It summarises the planned audit strategy for the year ended 31 March 2021 in respect of our audit of the financial statements and use of resources; comprising materiality, key audit risks and the planned approach to these; together with timetable and the BDO team.

The planned audit strategy has been discussed with management to ensure that it incorporates developments in the business during the year under review, the results for the year to date and other required scope changes.

This report contains matters which should properly be considered by the Force as a whole. We expect that the Joint Audit Committee will refer such matters to the PCC and Chief Constable, together with any recommendations, as it considers appropriate.

We look forward to discussing this plan with you at the Joint Audit Committee meeting on 29 April 2021 and to receiving your input on the scope and approach.

In the meantime if you would like to discuss any aspects in advance of the meeting please contact one of the team.

Rachel Brittain

21 April 2021



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This report has been prepared solely for the use of the Joint Audit Committee and Those Charged with Governance. In preparing this report we do not accept or assume responsibility for any other purpose or to any other person. For more information on our respective responsibilities please see the appendices.

# SCOPE AND MATERIALITY

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This summary provides an overview of the key audit matters that we believe are important to the Joint Audit Committee in reviewing the planned audit strategy for the PCC Group for the year ending 31 March 2021.

It is also intended to promote effective communication and discussion and to ensure that the audit strategy appropriately incorporates input from those charged with governance.

### Audit scope

The scope of the audit is determined by the National Audit Office's Code of Audit Practice that sets out what local auditors are required to do to fulfil their statutory responsibilities under the Local Audit and Accountability Act 2014. This includes: auditing the financial statements and consolidated entities (together the 'Group'); reviewing the arrangements to secure value for money through the economic, efficient and effective use of its resources; and, where appropriate, exercising the auditor's wider reporting powers and duties. The Code of Audit Practice was updated with effect from 1 April 2020 and as a consequence the scope of the use of resources work has changed for the year ended 31 March 2021. More information on this change is included on page 18.

Our approach is designed to ensure we obtain the requisite level of assurance in accordance with applicable laws, appropriate standards and guidance issued by the National Audit Office.

### Materiality

Planning materiality for the Group and Chief Constable, used for the pension fund only, will be set at 2% of the prior year pension fund liability. Specific materiality for income and expenditure and other balance sheet items will be set at 2.25% of prior year net cost of services expenditure. Planning materiality for the PCC will be set at 2% of prior year gross assets.

We have considered the results of the prior year audit and have increased the materiality levels accordingly. We also have an improved understanding of the financial statements and the users of the accounts, which supports using a higher materiality level. This will be revisited when the draft financial statements are received for audit.

Although materiality is the judgement of the engagement lead, the Joint Audit Committee is obliged to satisfy themselves that the materiality chosen is appropriate for the scope of the audit.

ENTITY	Materiality - Pension Fund	Pension fund clearly trivial threshold	Specific materiality - I&E / other balance sheet items	I&E / other balance sheet items clearly trivial threshold
Group	31,000,000	1,550,000	4,000,000	200,000
Police and Crime Commissioner Cambridgeshire and Peterborough	-	-	1,700,000	85,000
The Chief Constable of Cambridgeshire Constabulary	30,900,000	1,545,000	3,800,000	190,000

# AUDIT STRATEGY

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Our audit strategy is predicated on a risk based approach, so that audit work is focused on the areas of the financial statements where the risk of material misstatement is assessed to be higher, or where there is a risk that the organisation has not made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

We have discussed the changes to the PCC and Chief Constable systems and controls in the year with management and obtained their own view of potential audit risk in order to update our understanding of the Group's activities and to determine which risks impact on the numbers and disclosures in the financial statements, or on its arrangements for securing economy, efficiency and effectiveness in its use of resources. We will continue to update this assessment throughout the audit.

The table on the next page summarises our planned approach to audit risks identified.

There has been no significant change to audit risks identified or their classification as compared to the prior year. All material areas will be subject to a substantive approach.

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Risk identified	Risk rating	Fraud risk present	Testing approach	Impact of significant judgements and estimates
Management override of controls	Significant	Yes	Substantive	Medium
Expenditure recognition	Significant	Yes	Substantive	Low
Valuation of non-current assets	Significant	No	Substantive	High
Valuation of pension liability	Significant	No	Substantive	High
Related party transactions	Normal	No	Substantive	Low
Financial sustainability (use of resources)	Significant	N/A	N/A	N/A
Collaboration (use of resources)	Significant	N/A	N/A	N/A



# INDEPENDENCE AND FEES

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### Independence

We confirm that the firm complies with the Financial Reporting Council's Ethical Standard for Auditors and, in our professional judgement, is independent.

### Fees

	2020/21	2019/20
Police and Crime Commissioner Cambridgeshire and Peterborough	£23,360 <sup>2</sup>	£23,360
The Chief Constable of Cambridgeshire Constabulary	£11,550 <sup>2</sup>	£11,550
Additional audit fee: recurring	£16,414 <sup>1</sup>	£16,414 <sup>1</sup>
Additional audit fee: non-recurring	-	£7,834 <sup>1</sup>
<b>Total audit fees</b>	<b>TBC</b>	<b>£59,158</b>
Fees for non-audit services	-	-
<b>Total non-audit services fees</b>	<b>-</b>	<b>-</b>
<b>Total fees</b>	<b>TBC</b>	<b>£59,158</b>

### Fee variances

#### <sup>1</sup>Recurring increase to Scale Fee

The Public Sector Audit Appointments Limited (PSAA) scale fee is largely based on the historical position and so, it does not reflect any of the changes in audit scope and depth linked to current audit requirements for property, plant and equipment or pensions liability valuation work. An additional fee has been proposed for 2019/20 to cover the costs associated with increased regulatory requirements. A further additional fee has also been proposed for one off overrun events in 2019/20. This fee is a proposal and is currently being agreed with PSAA.

#### <sup>2</sup>Use of resources fee variance

The audit fee is based on audit scope under the Code of Audit Practice. A new Code is effective for periods commencing 1 April 2020, which significantly increases the work of auditors for reporting on a body's use of resources. We will propose a fee variation in respect of this once additional procedures have been fully scoped.

#### Amendments to the proposed fees

If we need to propose any amendments to the fees during the course of the audit, where our assessment of risk and complexity are significantly different from those reflected in the proposed fee or where we are required to carry out work in exercising our additional powers and duties, we will first discuss this with management. Where this requires a variation to the scale fee set by PSAA we will seek approval from PSAA. If necessary, we will also prepare a report outlining the reasons why the fee needs to change for discussion with the Joint Audit Committee.



# OVERVIEW

## Audit scope and objectives

Key components of our audit objectives and strategy for the Group are highlighted and explained on the following pages.

Audit planning is a collaborative and continuous process and our audit strategy, as reflected here, will be reviewed and updated as our audit progresses.

We will communicate any significant changes to our audit strategy, should the need for such change arise.

Reporting	Objectives
Auditing standards	We will perform our audit in accordance with International Standards on Auditing UK (ISAs (UK)) and relevant guidance published by the National Audit Office.
Financial statements	We will express an opinion on the PCC and Group financial statements, and the Chief Constable financial statements, prepared in accordance with the CIPFA Code of Practice on Local Authority Accounting 2020/21 and other directions.
Statement of Accounts	In addition to our objectives regarding the financial statements, we will also read and consider the other information contained in the Statement of Accounts to consider whether there is a material inconsistency between the other information and the financial statements or other information and our knowledge obtained during the audit.
Additional powers and duties	Where necessary we may be required to: issue of a report in the public interest; make a written recommendation to the Force; allow local electors to raise questions and objections on the accounts; or exercise legal powers to apply to the courts for a declaration that an item of account is contrary to law, issue an advisory notice or an application for a judicial review.
Audit Completion Report to the Joint Audit Committee	Prior to the approval of the financial statements, we will discuss our significant findings with the Joint Audit Committee. We will highlight key accounting and audit issues as well as internal control findings and any other significant matters arising from the audit.
Use of resources and Auditor's Annual Report	We will provide an annual commentary on the Force's arrangements to secure economy, efficiency and effectiveness in its use of resources. The commentary will explain the work that we have undertaken during the year and highlight any significant weaknesses identified, along with any recommendations for improvement. The commentary will also draw attention to emerging or developing issues which may not represent significant weaknesses, but which may nevertheless require attention from the Force. The Auditor's Annual Report is required to be published by the Force. This needs to be published within three months of issuing the accounts audit opinion.

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# AUDIT SCOPE ENTITIES, COMPONENTS AND AUDIT RISKS

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As Group auditor we are required to design an audit strategy to ensure we have obtained the required audit assurance for each component for the purposes of our Group audit opinion by ISA (UK) 600.

A high-level overview of how we have designed the Group audit strategy is summarised below to ensure you have clear oversight of the scope of the work we intend to perform on each entity.

Audit Risks, covered later in this report, are cross referenced to each entity to provide clarity over how these arise within your business and where the focus of the audit work will be.

The clearly trivial threshold for all components is set out on page 4.

Entity	Audit classification	Reason for classification	Audit Risks	Component Materiality and basis of assessment	Audit strategy
The Chief Constable of Cambridgeshire Constabulary	Significant	Size	Risk no. 1, 2, 4, 5	£3,800,000 based on 2.25% of gross expenditure	Statutory audit performed by BDO UK
Police and Crime Commissioner Cambridgeshire and Peterborough	Significant	Risk	Risk no. 1, 2, 3, 5	£1,700,000 based on 2% of gross assets	Statutory audit performed by BDO UK

# PROVISIONAL AUDIT TIMELINE

## An overview of the key dates

The deadlines for preparing and publishing local authority accounts have been amended for 2020/21, as part of the Government's response to Sir Tony Redmond's review. The consultation has pushed back the final accounts publication date to 30 September 2021 and requires draft accounts to be published on or before 1 August 2021, together with a requirement for local bodies to provide an explanation on their website if they miss the revised draft publication date.

The timeline for our audit has not been agreed and we will formalise a timeline with management in due course.



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As audit engagement lead I have primary responsibility to ensure that the appropriate audit opinion is given.

In meeting this responsibility I ensure that the audit has resulted in obtaining sufficient and appropriate evidence to provide reasonable, but not absolute, assurance that the financial statements are free from material misstatement, whether due to fraud or error, and to report on the financial statements and communicate as required by the ISAs (UK), in accordance with our findings.

I will ensure that we have undertaken sufficient work to assess the Force's arrangements for securing economy, efficiency and effectiveness in the use of its resources against the guidance published by the National Audit Office.

I am responsible for the overall quality of the engagement and am supported by the rest of the team as set out here.



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I will lead on the audit of the PCC and Chief Constable. I will work closely with Rachel to develop and execute the audit strategy. I will be a key point of contact on a day to day basis and will ensure that timelines are carefully managed to ensure that deadlines are met and matters to be communicated to management and the Joint Audit Committee are highlighted on a timely basis.



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I will be responsible for the day to day supervision of the audit team, and will be responsible for the delivery of the key audit work.

# OVERVIEW

## Audit risks

We have assessed the following as audit risks. These are matters assessed as most likely to cause a material misstatement in the financial statements or impact on our use of resources opinion and include those that will have the greatest effect on audit strategy, the allocation of audit resources and the amount of audit focus by the engagement team.

Key: **Significant** / **Normal**

Description of risk	Significant risk	Normal risk	Overview of risk
1. Management override of controls			Auditing standards presume that management is in a unique position to perpetrate fraud by overriding controls.
2. Expenditure recognition			For public sector bodies the risk of fraud is relevant to expenditure recognition.
3. Valuation of non-current assets			The valuation of non-current assets is a significant risk as it involves a high degree of estimation uncertainty.
4. Valuation of pension liability			The valuation of the pension liability is a significant risk as it involves a high degree of estimation uncertainty.
5. Related party transactions			There is a risk that related party disclosures are not complete and accurate.
6. Financial sustainability (use of resources)			The Force has estimated that it will face a funding gap over the medium term of £8.1 million. Significant savings will be required alongside use of the remaining Budget Reserve.
7. Collaboration - Governance / Economy, efficiency and effectiveness (use of resources)			There is a risk that the Force may not have adequate arrangements in place to make informed decisions and properly manage its risks, or, to use information about its costs and performance to improve the way it manages and delivers its services; especially around collaboration arrangements.

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**Auditing standards presume that management is in a unique position to perpetrate fraud by overriding controls.**

Significant risk	
Normal risk	
Fraud risk	
Assess design & implementation of controls to mitigate	
Significant Management estimates & judgements	
Controls testing approach	
Substantive testing approach	

## Risk detail

Management has the ability to manipulate accounting records and override controls that otherwise appear to be operating effectively. We are required to consider this as a significant risk of material misstatement due to fraud.

## Planned audit approach

Our audit procedures will include the following:

- Verifying journal entries made in the year, by agreeing the journals to supporting documentation. We will determine key risk characteristics to filter the population of journals and use our IT team to assist with the journal extraction
- Evaluating estimates and judgements applied by management in the financial statements to assess their appropriateness and the existence of any systematic bias
- Assessing unadjusted audit differences for indications of bias or deliberate misstatement.

# EXPENDITURE RECOGNITION

**For public sector bodies the risk of fraud is relevant to expenditure recognition.**

## Risk detail

Under International Standard on Auditing 240 “The Auditor’s responsibility is to consider fraud in an audit of financial statements”. In the public sector, the risk of fraud is modified by Practice Note 10 (PN10), issued by the Financial Reporting Council. PN10 states that auditors should also consider the risk that material misstatements may occur through the manipulation of expenditure recognition.

For net-spending bodies in the public sector there is increased risk of fraud related to expenditure. For the Force, we consider the risk of fraud to be in respect of the cut-off of non-payroll expenditure at year-end.

## Planned audit approach

We will confirm that expenditure is recognised in the correct accounting period by substantively testing a sample of expenditure items around year-end. A financial threshold will be set to determine the samples to be selected for this testing. A lower threshold will be used to account for the significant risk.

Significant risk	
Normal risk	
Fraud risk	
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Significant Management estimates & judgements	
Controls testing approach	
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**The valuation of non-current assets is a significant risk as it involves a high degree of estimation uncertainty.**

- Significant risk
- Normal risk
- Fraud risk
- Assess design & implementation of controls to mitigate
- Significant Management estimates & judgements
- Controls testing approach
- Substantive testing approach

## Risk detail

Police and Crime Commissioners are required to ensure that the carrying value of land and buildings is not materially different to the current value (operational assets) or fair value (surplus assets, assets held for sale and investment properties) at the balance sheet date.

There is a risk over the valuation of these assets due to the high degree of estimation uncertainty and where updated valuations have not been provided for a class of assets at the year-end. Revisions to ISA (UK) 540 mean that we need to update our approach to the audit of accounting estimates. This is detailed further on page 24.

## Planned audit approach

Our audit procedures will include the following:

- Reviewing the instructions provided to the valuer and the valuer’s skills and expertise in order to determine if we can rely on the management expert
- Confirming that the basis of valuation for assets valued in year is appropriate based on their usage
- Reviewing accuracy and completeness of information provided to the valuer, such as rental agreements and sizes
- Reviewing assumptions used by the valuer and movements against relevant indices for similar classes of assets
- Following up valuation movements that appear unusual
- Confirming that assets not specifically valued in the year have been assessed to ensure their reported values remain materially correct.

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**The valuation of the pension liability is a significant risk as it involves a high degree of estimation uncertainty**

- Significant risk
- Normal risk
- Fraud risk
- Assess design & implementation of controls to mitigate
- Significant Management estimates & judgements
- Controls testing approach
- Substantive testing approach

## Risk detail

The valuation of the defined benefit obligation is a complex calculation involving a number of significant judgements and assumptions. The actuarial estimate of the pension fund liability uses information on current, deferred and retired member data and applies various actuarial assumptions over pension increases, salary increases, mortality, commutation take up and discount rates to calculate the net present value of the liability. Revisions to ISA (UK) 540 mean that we need to update our approach to the audit of accounting estimates. This is detailed further on page 24.

There is a risk that the membership data and cash flows provided to the actuary at year end may not be accurate, and that the actuary uses inappropriate assumptions to value the liability. Relatively small adjustments to assumptions used can have a material impact on the Force’s liability.

The risk is applicable to both the Local Government Pension Scheme (LGPS) and the Police Pension Scheme liability.

## Planned audit approach

Our audit procedures will include the following:

- Agreeing the disclosures to the information provided by the pension fund actuary
- Assessing the competence of the management expert (actuary)
- Checking the reasonableness of the assumptions used in the calculation against other local government actuaries and other observable data
- Assessing the controls in place for providing accurate membership data to the actuary
- Contacting the pension fund auditor and requesting confirmation of the controls in place for providing accurate membership data to the actuary and testing of that data
- Checking that any significant changes in membership data have been communicated to the actuary.

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**There is a risk that related party disclosures are not complete and accurate.**

Significant risk  
Normal risk  
Fraud risk  
Assess design & implementation of controls to mitigate  
Significant Management estimates & judgements  
Controls testing approach  
Substantive testing approach

## Risk detail

Whilst management are responsible for the completeness of the disclosure of related party transactions in the financial statements, we are also required to consider related party transactions in the context of fraud as they may present greater risk for management override or concealment of fraud. Our audit approach includes the consideration of related party transactions throughout the audit including making enquiries of management and the Joint Audit Committee.

There is a risk that related party disclosures are not complete or accurate.

## Planned audit approach

Our audit procedures will include the following:

- Searches of the senior management on Companies House in order to identify any related parties not included in the Statement of Accounts
- For any additional related parties identified, searches in the ledger to identify transactions
- For related parties already identified, checks to ensure the relationship is correctly disclosed and that the figures disclosed match those included in the ledger.

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## New Code of Audit Practice (“Code”)

The Comptroller & Auditor General has put in place a new Code and associated guidance. This new Code determines that the key output from local audit work in respect of value for money (VFM) arrangements is a commentary as reported in the Auditor’s Annual Report, not a VFM arrangements ‘conclusion’ or ‘opinion’. There may be matters referred to in the auditor’s commentary that do not represent significant weaknesses in arrangements and where significant weaknesses are reported we are required to also report recommendations.

As auditors we need to gather sufficient evidence and document our evaluation of arrangements to enable us to draft our commentary under three reporting criteria. These criteria are:

- **Financial sustainability** - How the Force plans and manages its resources to ensure it can continue to deliver its services
- **Governance** - How the Force ensures that it makes informed decisions and properly manages its risks
- **Improving economy, efficiency and effectiveness** (‘Improving 3Es’) - How the Force uses information about its costs and performance to improve the way it manages and delivers its services.

In addition to new assessment criteria and commentary requirements, the scope of the new Code also considerably increases auditors’ requirements for documentation and management should expect an increase in requests for discussion and evidence to facilitate this requirement.

The Auditor’s Annual Report is required to be published no more than 3 months after the date of the opinion on the financial statements.

## Risk of Significant Weakness

We are required to report the results of our risk assessment to those charged with governance, including additional work planned in respect of any identified risks of significant weakness, and to keep our risk assessment under continual review, with any changes again communicated to those charged with governance.

The risks identified to date are set out on pages 19 to 20 below. We are working through the implications of the new Code, including our risk assessment and a work programme that addresses risks of significant weakness identified.

Pertinent matters from early discussions with management include how the Force plans finances to support the sustainable delivery of services in accordance with its strategic and statutory priorities (Financial Sustainability), how the Force ensures it delivers its role, engages with stakeholders, monitors performance and acts for improvement within significant partnerships (Improving 3Es) and how the Force ensures it makes properly informed decisions, supported by appropriate evidence and allowing for challenge and transparency (Governance).

We will update the Joint Audit Committee on risks of significant weakness and planned work when it meets in July 2021.

# FINANCIAL SUSTAINABILITY (USE OF RESOURCES)

## Financial sustainability

**There is a risk that the Force may not have adequate arrangements in place to plan and manage its resources to ensure it can continue to deliver services.**

Significant risk  
Normal risk  
Fraud risk  
Assess design & implementation of controls to mitigate  
Significant Management estimates & judgements  
Controls testing approach  
Substantive testing approach

### Risk detail

At month 11 the Authority reported year-to-date expenditure of £137.3 million, which represents a favourable variance to plan of £1.8 million, and is forecasting that by the year end expenditure will be £151.4 million which, if delivered, will represent a favourable variance to plan of £1.0 million.

It has been noted that the key savings achieved include lower payroll costs than budgeted, arising due to the PCC and Chief Constable having less employees than budgeted in some areas, and also due to non-recurring savings incurred directly as a result of the coronavirus pandemic on areas such as fuel and travel costs, and utility costs in office spaces. These savings are not therefore expected to continue into future years.

The month 11 revenue and capital budget monitoring report forecasts a decrease in usable reserves of £2.0 million for the 2020/21 year, although this decrease is incurred as a result of the funding of the capital programme and not due to budget gaps.

The latest version of the medium term financial strategy shows a balanced budget for 2020/21, 2021/22 and 2022/23, with budget gaps of £3.8 million and £4.3 million for the years 2023/24 and 2024/25 respectively. The current level of useable reserves is not sufficient to sustain these budget gaps in the medium term, and the PCC and Chief Constable will be required to either find savings or obtain borrowings. We therefore consider there to be a risk over financial sustainability in the medium term.

### Planned audit approach

Our audit procedures will include the following:

- Evaluating the Force's in year budget monitoring processes, and the completeness and accuracy of management information reported for decision making purposes
- Assessing the Force's medium term financial plan and annual budgets, including the reasonableness of the underlying assumptions made by management and the consideration of risks to sustainable finances
- Evaluating the process by which the Force monitors its savings, and considering progress against savings targets, to determine if future targets are realistic and achievable

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# COLLABORATION (USE OF RESOURCES)

## Improving Economy, efficiency & effectiveness and Governance

**There is a risk that the Force may not have adequate arrangements in place to make informed decisions, or to use information about its costs and performance to improve the way it manages and delivers its services.**

Significant risk

Normal risk

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

### Risk detail

A number of the Force's public services are delivered through collaborated working with other forces. Arrangements for these activities are sometimes led by other forces.

There is a risk that Cambridgeshire and Peterborough may not have access to accurate and timely management information (including non-financial information where appropriate), especially where they are not the lead force in the arrangements. This could lead to difficulties making properly informed decisions, or may result in the Force not having the appropriate evidence needed to justify the continued and increased use of collaborated functions.

There is a risk that the Force may not have adequate arrangements in place to be able to assess and improve the way that collaborated services are delivered, especially where another force leads arrangements on behalf of Cambridgeshire and Peterborough. This could result in failure to deliver efficiency and performance improvements that are expected when working through the collaborations.

### Planned audit approach

Our audit procedures will include the following:

- Evaluating how the Force monitors and assesses risk in the collaboration and how the Force gains assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud
- Assessing how the Force ensures effective processes and systems are in place to communicate or obtain relevant, accurate and timely management information across the collaboration
- Assessing how the Force evaluates collaborated services and how financial and performance information has been used to assess performance in collaborated areas, and identify areas for improvement
- Evaluating how the Force ensures it delivers its own role within significant partnerships, engages with stakeholders it has identified, monitors performance against expectations, and ensures action is taken where necessary to improve
- Evaluating how the Force ensures that collaborated activities are delivered in accordance with the section 22 agreements, professional standards and internal policies
- Identifying and analysing how the Force assesses whether it is realising the expected benefits of collaborated working.

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## Fraud

Whilst the management of the PCC and Chief Constable have ultimate responsibility for prevention and detection of fraud, we are required to obtain reasonable assurance that the financial statements are free from material misstatement, including those arising as a result of fraud. Our audit approach includes the consideration of fraud throughout the audit and includes making enquiries of management and those charged with governance.

We have not been made aware of any actual alleged or suspected incidences of fraud. We request confirmation from the Joint Audit Committee on their knowledge of any instances of fraud, and a discussion on the controls and processes in place to ensure timely identification and action.

Management believe that there is low risk of material misstatement arising from fraud and that controls in operation would prevent or detect material fraud.

## Accounting policies

We will report to you on significant qualitative aspects of your chosen accounting policies. We will consider the consistency and application of the policies and we will report to you where accounting policies are inconsistent with the CIPFA Code of Practice on Local Authority Accounting 2020/21 under the circumstances.

## Internal audit

We will ensure that we maximise the benefit of the overall audit effort carried out by internal audit and ourselves, whilst retaining the necessary independence of view.

We will review the reports issued by the Force's internal audit function although we do not plan to place reliance on their work in respect of their assessment of control processes.

We will seek to rely on the work of Internal Audit to support our VFM assessment.

## Significant accounting estimates and judgements

We will report to you on significant accounting estimates and judgements. We will seek to understand and perform audit testing procedures on accounting estimates and judgements including consideration of the outcome of historical judgements and estimates. We will report to you our consideration of whether management estimates and judgements are within an acceptable range.

## Laws and regulations

We will consider compliance with laws and regulations. The most significant of these for your organisation includes VAT legislation, Employment Taxes, Health and Safety and the Bribery Act 2010. We will make enquiries of management and review correspondence with the relevant authorities.

## Related parties

Whilst you are responsible for the completeness of the disclosure of related party transactions in the financial statements, we are also required to consider related party transactions in the context of fraud as they may present greater risk for Management override or concealment of fraud. Our audit approach includes the consideration of related party transactions throughout the audit including making enquiries of management.

## Financial statement disclosures

We will report to you on the sufficiency and content of your financial statement disclosures.

## Contingencies

We request input from the Joint Audit Committee on recent claims.

## Any other matters

We will report to you on any other matters relevant to the overseeing of the financial reporting process. Where applicable this includes why we consider a significant accounting practice that is acceptable under the financial reporting framework not to be the most appropriate.

# GOING CONCERN

## Management are required to make an assessment of the Groups' ability to continue as a going concern.

### Managements' responsibilities

It is managements' responsibility to make an assessment of the groups' ability to continue as a going concern to support the basis of preparation for the financial statements and disclosures in the financial statements. This is a requirement of the accounting standards.

This assessment should be supported by detailed cash flow forecasts with clear details of the key underlying assumptions, consideration of available finance throughout the forecast period, and a consideration of the forecast's sensitivity to possible variations in those assumptions along with any other relevant factors.

The going concern assessment should cover a minimum of 12 months from the date of the directors' approval of the financial statements. However, consideration should also be given to any major events or circumstances that may fall outside this period.

### Audit responsibilities

Our responsibilities in respect of going concern are:

- To obtain sufficient appropriate audit evidence regarding, and conclude on, i) whether a material uncertainty related to going concern exists; and ii) the appropriateness of management's use of the going concern basis of accounting in the preparation of the financial statements
- To report in accordance with ISA (UK) 570.

We will obtain an understanding of the business model, objectives, strategies and related business risk, the measurement and review of the Police and Crime Commissioners' and the Chief Constables' financial performance including forecasting and budgeting processes and the force's risk assessment process. We will evaluate:

- The Forces' method, including the relevance and reliability of underlying data used to make the assessment, whether assumptions and changes to assumptions from prior years are appropriate and consistent with each other
- The Forces' plans for future actions in relation to the going concern assessment including whether such plans are feasible in the circumstances
- The adequacy and appropriateness of disclosures in the financial statements regarding the going concern assessment and any material uncertainties that may exist.

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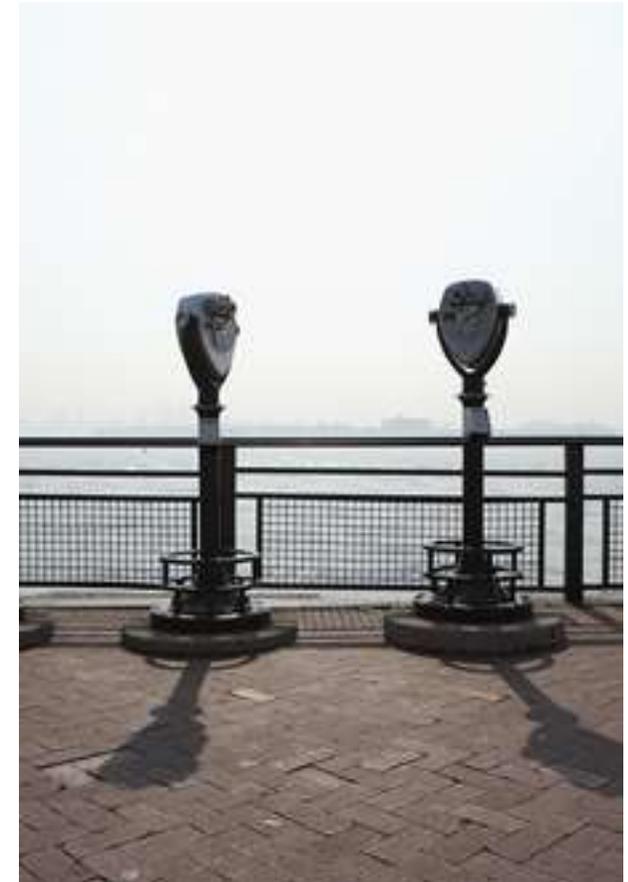
We are required to include in our auditor's report an explanation of the extent to which the audit is considered capable of detecting irregularities (non compliance with laws and regulations), including fraud.

Our audit is designed to provide reasonable assurance about whether the financial statements as whole are free from material misstatement whether due to fraud or error. We design audit procedures to respond to the risk of material misstatement in the financial statements, recognising that the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error. Irregularities that result from fraud might be inherently more difficult to detect than irregularities that result from error.

Our audit work will focus on laws and regulations that could give rise to a material misstatement in the PCC or Chief Constable's financial statements and may include, where appropriate:

- Obtaining an understanding of the control environment in monitoring compliance with laws and regulations
- Enquiries of management, those charged with governance and the Forces' legal advisers
- Agreement of the financial statement disclosures to underlying supporting documentation
- Review of minutes of senior management meetings throughout the year and of correspondence with regulatory authorities
- Written representations.

There are inherent limitations in the audit procedures described above and the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely we would become aware of it.



# ACCOUNTING ESTIMATES

**Revision to ISA (UK) 540 means that we may need to update our approach to the audit of accounting estimates - including confirmation and documentation of our understanding of the Force's estimation process.**

We will need to obtain an understanding of how you control your estimation process including not only the design and implementation of the process, but also the policies and procedures you put in place to satisfy yourself that each step in the process is properly applied, and that the resulting accounting estimates are reasonable.

For significant accounting estimates, particularly those that are complex or where there is a high degree of estimation uncertainty we will also make enquiries about how you:

- Make those responsible for deriving or changing your accounting estimates aware of relevant significant transactions, conditions or events
- Review the outcome(s) of previous accounting estimates and respond to the results of that review
- Identify and comply with the relevant requirements in the applicable financial reporting framework regarding your accounting estimates and related disclosures including how they are affected by complexity and your judgment
- Account for regulatory factors relevant to the Force's accounting estimates, including, when applicable, regulatory frameworks related to prudential supervision
- Identify the need for, and apply, specialised skills or knowledge related to accounting estimates, including with respect to the use of a management's expert
- Identify and address risks related to accounting estimates through your risk assessment process

- Identify relevant methods (including models), assumptions and data and the need for changes in them, and from those identified, select which to apply
- Address the degree of estimation uncertainty in selecting your final point estimates
- Describe in your financial statements matters related to your process for deriving your accounting estimates, and matters related to the degrees of estimation uncertainty underlying your accounting estimates
- Ensure there is oversight and governance in place over management's financial reporting process relevant to accounting estimates.

Under ISA (UK) 540 (revised) our audit approach will involve a more granular risk assessment relating to each significant estimate and separate consideration of the methods (or models) applied in calculating the estimate, the nature, source and reliability of data used and the significance, consistency and appropriateness of assumptions made.

We will also request written representations from you regarding the reasonableness of the methods, significant assumptions and the data used in determining the monetary amounts of accounting estimates, including the related disclosures, in accordance with the CIPFA Code of Practice on Local Authority Accounting 2020/21.

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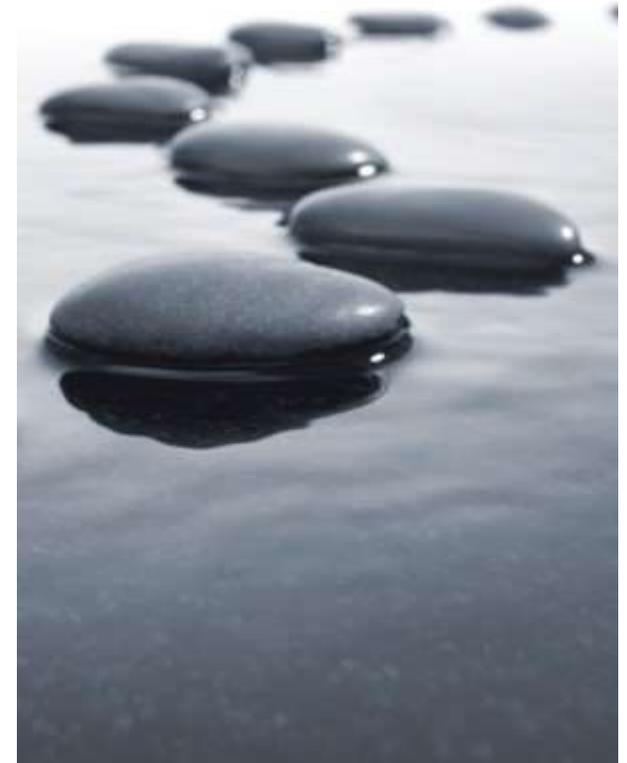
IT General Controls (ITGCs) are the policies and procedures that relate to many IT applications and support the effective functioning of application controls by helping to ensure the continued proper operation of information systems. They commonly include controls over data center and network operations; system software acquisition, change and maintenance; access security; and application system acquisition, development, and maintenance.

ITGCs are an important component in systems of internal control, and sometimes have a direct impact on the reliability of other controls.

IT assurance is embedded in our audit strategy to ensure the IT systems provide a suitable platform for the control environment and is undertaken in conjunction with our IT Assurance team. Our testing strategy includes a tailored range of data analytics, system configuration and IT environment testing.

We will also obtain an understanding of the information system, including the related business processes relevant to financial reporting, to include:

- E-financials
- iTrent.



# FRC ETHICAL STANDARD (DECEMBER 2019)

In December 2019 the FRC published the Revised Ethical Standard 2019 ('ES'), which is applicable from 15 March 2020. There are some transitional provisions for services and arrangements that are not currently prohibited under the existing Standard. The ES aims to further strengthen auditor independence and enhance confidence in the profession. The table below provides a high level summary of the key headlines as applicable to our audit of the Group, PCC and Chief Constable.

Key headlines	Impact
<b>The objective, reasonable &amp; informed third party test</b>	Reinforcement that ethical principles take priority over rules. A need to take care where particular facts and circumstances are either not addressed directly by the rules or might appear to 'work around' the rules, or result in an outcome that is inconsistent with the general principles.
<b>Contingent fees</b>	Non-audit services with contingent or success-based fee arrangements will be prohibited for audited entities.
<b>Secondments</b>	All secondments/loan staff to audited entities are prohibited with the exception of secondments to public sector entities.
<b>Recruitment and remuneration services</b>	Prohibition on providing remuneration services to audited entities such as advising on the quantum of the remuneration package or the measurement criteria for calculation of the package. In addition, the prohibition on providing recruitment services to an audited entity that would involve the firm taking responsibility for, or advising on the appointment of, any director or employee of the entity.

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# INDEPENDENCE

**Under ISAs (UK) and the FRC's Ethical Standard we are required, as auditors, to confirm our independence.**

We have embedded the requirements of the auditing standards in our methodologies, tools and internal training programmes. Our internal procedures require that audit engagement leads are made aware of any matters which may reasonably be thought to bear on the integrity, objectivity or independence of the firm, the members of the engagement team or others who are in a position to influence the outcome of the engagement.

This document considers such matters in the context of our audit for the year ending 31 March 2021.

We confirm that the firm, the engagement team and other partners, directors, senior managers and managers conducting the audit comply with relevant ethical requirements including the FRC's Ethical Standard and are independent of the Police and Crime Commissioner and the Chief Constable.

We also confirm that we have obtained confirmation that external audit experts involved in the audit comply with relevant ethical requirements including the FRC's Ethical Standard and are independent of the Police and Crime Commissioner and the Chief Constable.

Should you have any comments or queries regarding any independence matters we would welcome their discussion in more detail.

## **Non-audit services**

Details of services, other than audit, provided by us to the group during the period and up to the date of this report are set out in the fees table on page 7.

Should you have any comments or queries regarding any independence matters we would welcome their discussion in more detail.

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# FORCE'S RESPONSIBILITIES

## The Force's responsibilities and reporting

### Financial reporting

The PCC and the Chief Constable are expected to have effective governance arrangements to deliver their objectives. To this end, the publication of the financial statements is an essential means by which the PCC and Chief Constable account for their stewardship and use of the public money at their disposal.

The form and content of the financial statements, and any additional schedules or returns for consolidation purposes, should reflect the requirements of the relevant accounting and reporting framework in place and any applicable accounting standards or other direction under the circumstances.

The PCC is also required to prepare schedules or returns to facilitate the preparation of consolidated accounts such as HM Treasury's Whole of Government Accounts.

The Section 151 Officer is responsible for preparing and filing a Statement of Accounts and financial statements which show a true and fair view in accordance with CIPFA Code of Practice on Local Authority Accounting 2020/21, applicable accounting standards or other direction under the circumstances.

Our audit of the financial statements does not relieve management nor those charged with governance of their responsibilities for the preparation of materially accurate financial statements.

### Use of resources

Forces are required to maintain an effective system of internal control that supports the achievement of their policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at their disposal.

As part of the material published with its financial statements, the Force is required to bring together commentary on its governance framework and how this has operated during the period in a Governance Statement.

In preparing its Governance Statement, the Force will tailor the content to reflect its own individual circumstances, consistent with the requirements of the relevant accounting and reporting framework and having regard to any guidance issued in support of that framework. This includes a requirement to provide commentary on their arrangements for securing value for money from their use of resources.

# OUR RESPONSIBILITIES

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### Our responsibilities and reporting - financial reporting

We are responsible for performing our audit under International Standards on Auditing (UK) to form and express an opinion on your financial statements. We report our opinion on the financial statements to the Police and Crime Commissioner and the Chief Constable.

We read and consider the ‘other information’ contained in the Annual Report such as the additional narrative reports. We will consider whether there is a material inconsistency between the other information and the financial statements or other information and our knowledge obtained during the audit.

### Our responsibilities and reporting - use of resources

We are required to satisfy ourselves that the Force has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

This means that we have regard to relevant guidance issued by the National Audit Office and undertake sufficient work to be able to satisfy ourselves as to whether the Force has put arrangements in place that support the achievement of value for money and to provide an annual commentary on arrangements in the Auditor’s Annual Report.

### What we don’t report

Our audit is not designed to identify all matters that may be relevant to the Force and the Joint Audit Committee and cannot be expected to identify all matters that may be of interest to you and, as a result, the matters reported may not be the only ones which exist.



# COMMUNICATION WITH YOU

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## Those charged with governance

References in this report to ‘those charged with governance’ are to the group as a whole. For the purposes of our communication with those charged with governance you have agreed we will communicate primarily with the Joint Audit Committee.

In communicating with the Joint Audit Committee, representing TCWG of the parent and the Group, we consider TCWG of subsidiary entities to be informed about matters relevant to their subsidiary. Please let us know if this is not appropriate.

## Communication, meetings and feedback

We request feedback from you on our planning and completion report to promote two way communication throughout the audit process and to ensure that all risks are identified and considered; and at completion that the results of the audit are appropriately considered. We will meet with management throughout the audit process. We will issue regular updates and drive the audit process with clear and timely communication, bringing in the right resource and experience to ensure efficient and timely resolution of issues.

## Audit Planning Report

The Audit Planning Report sets out all planning matters which we want to draw to your attention including audit scope, our assessment of audit risks and materiality.

## Internal Controls

We will consider internal controls relevant to the preparation of financial statements in order to design our audit procedures and complete our work. This is not for the purpose of expressing an opinion on the effectiveness of internal control.

## Audit Completion Report

At the conclusion of the audit, we will issue an Audit Completion Report to communicate to you key audit findings before concluding our audit opinion. We will include any significant deficiencies in internal controls which we identify as a result of performing audit procedures. We will meet with you to discuss the findings and in particular to receive your input on areas of the financial statements involving significant estimates and judgements and critical accounting policies.

Once we have discussed the contents of the Audit Completion Report with you and having resolved all outstanding matters we will issue a final version of the report.

## Auditor’s Annual Report

We will provide an annual commentary on the Force’s arrangements to secure economy, efficiency and effectiveness in its use of resources. The commentary will explain the work that we have undertaken during the year and highlight any significant weaknesses identified, along with any recommendations for improvement. The commentary will also draw attention to emerging or developing issues which may not represent significant weaknesses, but which may nevertheless require attention from the Force. The Auditor’s Annual Report is required to be published by the Force. This is required to be published no more than three months after the date of the opinion on the financial statements.

# TEAM MEMBER ROTATION

This table indicates the latest rotation periods normally permitted under the independence rules of the FRC’s Ethical Standard.

In order to safeguard audit quality we will employ a policy of gradual rotation covering the team members as well as other senior members of the engagement team to ensure a certain level of continuity from year to year.



## Independence - engagement team rotation

Senior team members	Number of years involved	Rotation to take place after
Rachel Brittain Engagement lead	2	5 years
Matthew Weller Manager	3	10 years

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# MATERIALITY: DEFINITION AND APPLICATION

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## Concept and definition

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to monetary misstatements but also to disclosure requirements and adherence to appropriate accounting principles and statutory requirements.

We apply the concept of materiality both in planning and performing our audit, and in evaluating the effect of misstatements. For planning, we consider materiality to be the magnitude by which misstatements, including omissions, could influence the economic decisions of reasonable users that are taken on the basis of the financial statements. In order to reduce to an appropriately low level the probability that any misstatements exceed materiality, we use a lower materiality level, performance materiality, to determine the extent of testing needed. Importantly, misstatements below these levels will not necessarily be evaluated as immaterial as we also take account of the nature of identified misstatements, and the particular circumstances of their occurrence, when evaluating their effect on the financial statements as a whole.

Materiality therefore has qualitative as well as quantitative aspects and an item may be considered material, irrespective of its size, if it has an impact on (for example):

- Narrative disclosure e.g. accounting policies, going concern
- Instances when greater precision is required (e.g. disclosure of senior officers' remuneration and related party transactions).

International Standards on Auditing (UK) also allow the auditor to set a lower level of materiality for particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than materiality for the financial statements as a whole could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

## Calculation and determination

We have determined materiality based on professional judgement in the context of our knowledge of the Group, including consideration of factors such as industry developments, financial stability and reporting requirements for the financial statements.

We determine materiality in order to:

- Assist in establishing the scope of our audit engagement and audit tests
- Calculate sample sizes
- Assist in evaluating the effect of known and likely misstatements on the Group financial statements.

## Reassessment of materiality

We will reconsider materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality if we had been aware.

Further, when we have performed all our tests and are ready to evaluate the results of those tests (including any misstatements we detected) we will reconsider whether materiality combined with the nature, timing and extent of our auditing procedures, provided a sufficient audit scope.

## Definition of materiality under IFRS

Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity.

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If we conclude that our audit scope was sufficient, we will use materiality to evaluate whether uncorrected misstatements (individually or in aggregate) are material.

You should be aware that any misstatements that we identify during our audit, both corrected and uncorrected errors, might result in additional audit procedures being necessary.

## Unadjusted errors

We will communicate to you all uncorrected misstatements identified during our audit, other than those which we believe are ‘clearly trivial’.

Clearly trivial is defined as matters which will be of a wholly different (smaller) order of magnitude than the materiality thresholds used in the audit, and will be matters that are clearly inconsequential, whether taken individually or in aggregate.

We will obtain written representations from the Joint Audit Committee confirming that in their opinion these uncorrected misstatements are immaterial, both individually and in aggregate and that, in the context of the financial statements taken as a whole, no adjustments are required.

We will request that you correct all uncorrected misstatements. In particular we would strongly recommend correction of errors whose correction would affect compliance with contractual obligations or governmental regulations. Where you choose not to correct all identified misstatements we will request a written representation from you setting out your reasons for not doing so and confirming that in your view the effects of any uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as whole.

# NEW ACCOUNTING STANDARDS, AUDITING STANDARDS AND OTHER FINANCIAL REPORTING DEVELOPMENTS

We would like to draw to your attention the following summary of key changes to standards, regulations and other financing reporting developments, their effective dates and an indication, based on preliminary discussions with management and our sector understanding, of their possible effect on the annual report.

New Accounting Standards, Auditing Standards and Other Financial Reporting Developments	Expected effect				Effective for periods beginning on or after 1 January	
	None	Low	Medium	High	2020	2021
Amendments to IFRS 3 <i>Definition of a business</i>	●					●
Auditing standard - audit of accounting estimates						
Increased emphasis on understanding management's processes, systems and controls estimation uncertainty and financial statement disclosures			●		●	
Auditing standard - going concern						
Increased emphasis on evaluation of management's assessment of the entity's ability to continue as a going concern			●		●	
Auditing standard - audit reports						
New audit report format with updated conclusion on going concern and reference to irregularities, including fraud			●		●	

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# AQR RESULTS 2019/20

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### Overview

The FRC released their Audit Quality Review results for the 7 largest accountancy firms in July 2020 for the review period 2019/20. A copy of all of the reports can be found on the [FRC Website](#).

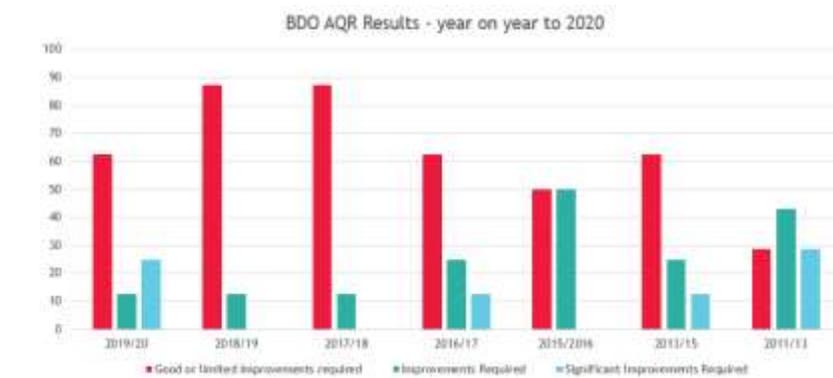
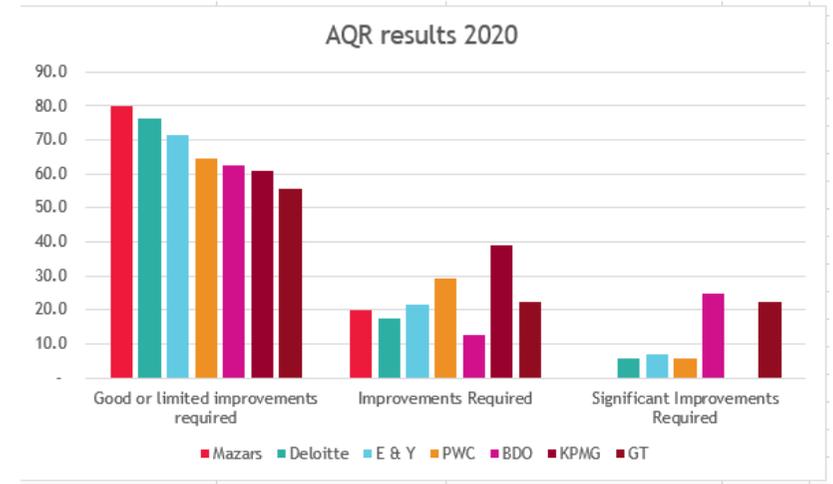
### Firm's Results

The graphs demonstrate our performance in relation to the other 6 largest firms. Having topped the table for audit quality for the last two consecutive years, we are disappointed to see a decline in our results. These scores remind us we must remain committed to continuous improvements and, having carefully considered the root causes of the AQR findings, we are in the process of implementing detailed action plans where required. We have made a number of enhancements to our Audit Quality Plan to address these issues to drive our key focus of a continuous improvement in audit quality including highlighting how we will make changes to our root cause analysis process which plays a key role.

We would encourage you to read our report which includes:

- Details of the root cause analysis we have been undertaking to address issues raised
- The actions we have/are undertaking to address the issues raised by the AQR
- A number of areas of good practice the AQR review team identified whilst undertaking their review.

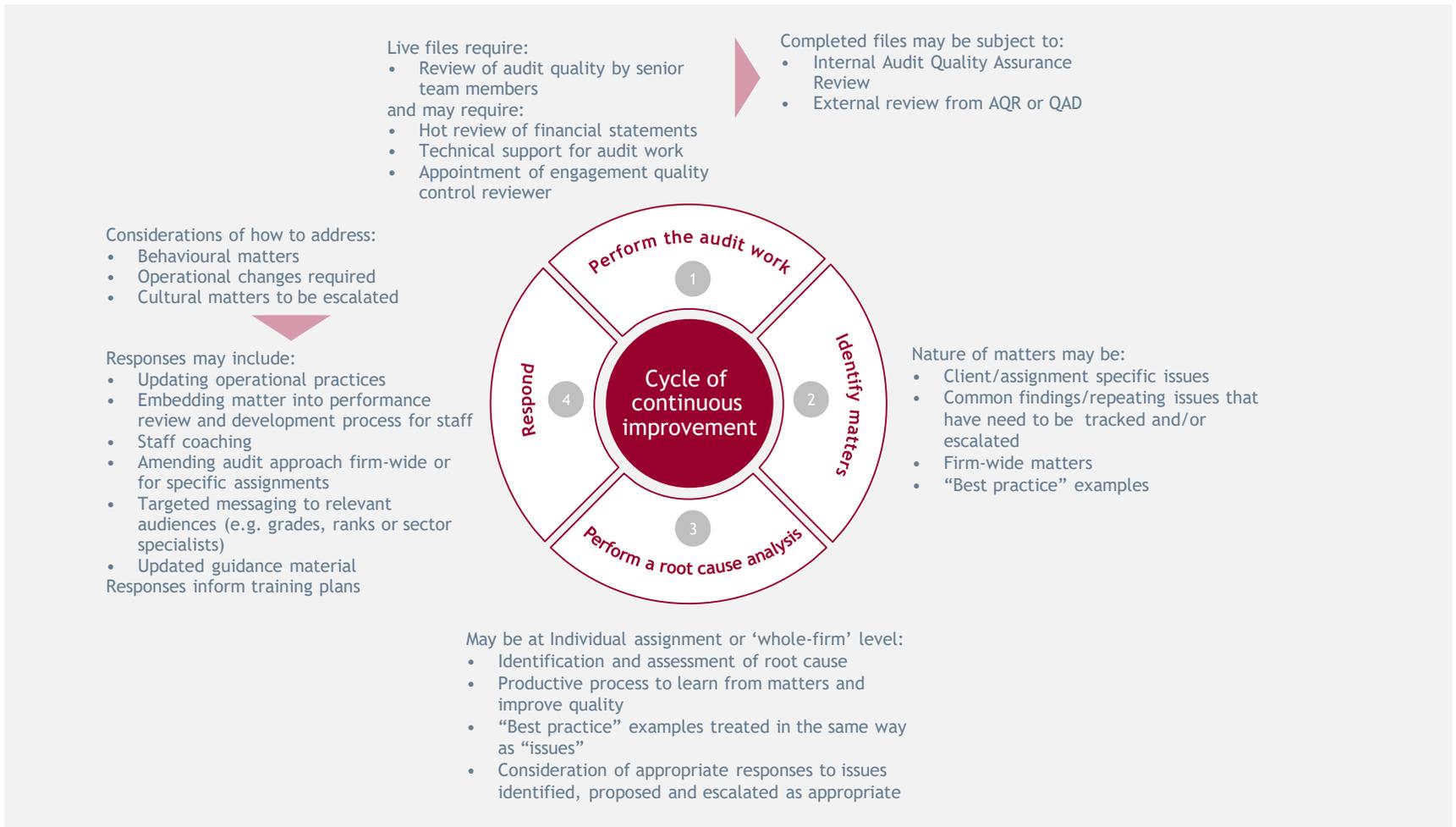
More details will be included in our Transparency Report which will be available on our [www.bdo.co.uk](http://www.bdo.co.uk)



# AQR RESULTS 2019/20

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The matters raised in our report prepared in connection with the audit are those we believe should be brought to your attention. They do not purport to be a complete record of all matters arising. This report is prepared solely for the use of the company and may not be quoted nor copied without our prior written consent. No responsibility to any third party is accepted.

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