



BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

WEDNESDAY 24TH SEPTEMBER 2014, AT 5.00 P.M.

THE COUNCIL HOUSE, BURCOT LANE, BROMSGROVE

SUPPLEMENTARY DOCUMENTATION

The attached papers were specified as "to follow" and are a replacement for the original report on the Agenda previously distributed relating to the above mentioned meeting.

3. Audit Findings Report 2013/14 (To Follow) (Pages 1 - 44)
5. Allocation Policy for Grant Funding To Ward Members (Pages 45 - 54)
(Replacement Report and Appendices)

K. DICKS
Chief Executive

The Council House
Burcot Lane
BROMSGROVE
Worcestershire
B60 1AA

18th September 2014

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CABINET

24TH SEPTEMBER 2014

GRANT THORNTON AUDIT FINDINGS REPORT 2013/14

Relevant Portfolio Holder	Cllr Michael Webb
Portfolio Holder Consulted	Yes
Relevant Head of Service	Jayne Pickering (Exec Director)
Wards Affected	All
Ward Councillor Consulted	None specific

1. SUMMARY OF PROPOSALS

- 1.1 To enable Members to consider the Audit Findings Report as attached at Appendix 1 for 2013/14 from Grant Thornton.

2. RECOMMENDATIONS

- 2.1 That Cabinet considers and notes the Audit Findings Report 2013/14 as attached at Appendix 1.
- 2.2 That Cabinet recommend to Council the approval of the draft letter of representation as included at Appendix 2.

3. KEY ISSUES

Financial Implications

- 3.1 None other than those included in this report.

Legal Implications

- 3.2 The Accounts and Audit Regulations 2011 require that the Council complies with statutory accounting legislation and changes.

Service / Operational Implications

- 3.3 The Statement of Accounts were approved by the Executive Director of Finance and Resources in June 2014 in accordance with revised legislation on approval of the accounts which included formal approval of the Accounts by Council by 30th September each year.
- 3.4 The formal Audit Findings Report is attached at Appendix 1. During the External Audit of the Accounts for 2013/14 it was recognised by Grant Thornton that the accounts were well prepared and working papers appropriate. In addition there were no significant adjustments made to the financial statements.

CABINET

24TH SEPTEMBER 2014

- 3.5 There are a number of recommendations proposed by the Grant Thornton that have been agreed by officers. These are included in the Appendix and an action plan will be developed by officers to deliver the improvements required. There are 3 high priority recommendations –
- Those charged with Governance to have regular updates on the ledger implementation. Independent assurance on this to be provided by Internal Audit
 - Officers are working with Audit to develop the project plan for implementation
 - Undertake a review of 2013/14 outturn to have a better understanding of the recurring savings
 - Finance officers are working with Heads of Service to identify these savings to build into future reports
 - Accelerate the work around reporting of measures
 - These are in place throughout the organisation and officers are identifying the most appropriate form of reporting to members
- 3.6 In addition to the work on the accounts preparation the Grant Thornton assess their opinion on value for money. Their conclusion is that they are satisfied that the Council has put in place proper arrangements to secure economy, efficiency and effectiveness during 2013/14.

Customer / Equalities and Diversity Implications

- 3.7 None as a direct result of this report.

4. RISK MANAGEMENT

- 4.1 The corporate risk register includes the preparation of the accounts and the controls in place to ensure the accounts are treated in compliance with accounting standards.

5. APPENDICES

Appendix 1 – Grant Thornton – Audit Findings Report 2013/14

Appendix 2 – Grant Thornton – Draft Letter of Representation 2013/14

AUTHOR OF REPORT

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The Audit Findings for Bromsgrove District Council

DRAFT

This version of the report is a draft. Its contents and subject matter remain under review and its contents may change and be expanded as part of the finalisation of the report.

Year ended 31 March 2014

September 2014

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Agenda Item 3

The contents of this report relate only to those matters which came to our attention during the conduct of our normal audit procedures which are designed primarily for the purpose of expressing our opinion on the financial statements. Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify any control weaknesses, we will report these to you. In consequence, our work cannot be relied upon to disclose defalcations or other irregularities, or to include all possible improvements in internal control that a more extensive special examination might identify.

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.

Contents

Section	Page
1. Executive summary	[4]
2. Audit findings	[9]
3. Value for Money	[22]
4. Fees, non audit services and independence	[29]
5. Communication of audit matters	[31]

Appendices

- A Action plan
- B Audit opinion

Page 5

Section 1: Executive summary

01. Executive summary

02. Audit findings

03. Value for Money

04. Fees, non audit services and independence

05. Communication of audit matters

Page 6

Executive summary

Purpose of this report

This report highlights the key matters arising from our audit of Bromsgrove District Council's ('the Council') financial statements for the year ended 31 March 2013. It is also used to report our audit findings to management and those charged with governance in accordance with the requirements of International Standard on Auditing 260 (ISA).

Under the Audit Commission's Code of Audit Practice we are required to report whether, in our opinion, the Council's financial statements present a true and fair view of the financial position, its expenditure and income for the year and whether they have been properly prepared in accordance with the CIPFA Code of Practice on Local Authority Accounting. We are also required to reach a formal conclusion on whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources (the Value for Money conclusion).

Introduction

In the conduct of our audit we have not had to alter or change our planned audit approach, which we communicated to you in our Audit Plan dated March 2014.

Our audit is substantially complete although we are finalising our work in the following areas:

- completion of our work on council tax and business rates
- operating segments

- external confirmation of bank balances
- obtaining and reviewing the final management letter of representation
- review of final version of the Annual Governance Statement (AGS)
- updating our post balance sheet events review, to the date of signing the opinion
- Whole of Government Accounts

We received draft financial statements and accompanying working papers at the start of our audit, in accordance with the agreed timetable.

Key issues arising from our audit

Financial statements opinion

We anticipate providing an unqualified opinion on the financial statements. No adjustments have been made affecting the Council's overall reported financial position.

The draft financial statements recorded net expenditure of £12,599 k which is unchanged following the audit. Some adjustments have been made to disclosure notes, stated accounting policies and the AGS to improve the presentation of the financial statement and to ensure they are consistent with the requirements of the Statement of Recognised Practice (SORP). However it is pleasing to note that overall the level of adjustments made to the accounts were not significant and arrangements to support the audit were adequate.

There have been changes in key personnel involved in both preparing the overall accounts and some of the key elements, including housing benefits and revenues. This provided some challenges in undertaking the audit, however we worked with your officers to overcome the difficulties presented. It is pleasing to note that there were no significant matters arising from the audit. Your team worked hard to provide accurate working papers and to give responses to queries as quickly as possible and should be congratulated on their commitment to supporting the audit.

There have also been some changes in the accounting for council tax and NDR, including the need to determine an appeals provision for the first time this year. We audited these changes and found that the Council had undertaken these changes in line with requirements.

Group accounts are prepared, to reflect the Council's interest in the 'Artrix' Centre. The accounts reflect the value of the building and the associated capital transactions. The Council provides a grant to support the centre, and we have once again received a question from a member of the public on this, which we are currently responding to.

Further details are set out in section 2 of this report.

Whole of Government Accounts (WGA)

We will complete our work in respect of the Whole of Government Accounts in accordance with the national timetable. We are expecting that the Council will require only limited procedures, as in previous years.

Value for Money conclusion

We are pleased to report that our review of the Council's arrangements to secure economy, efficiency and effectiveness has not highlighted matters that would prevent us from issuing an unqualified value for money conclusion.

The Council has once again underspent against its budget, which has meant that there are general fund balances of over £3.7m. Whilst this provides the Council with resilience in which to manage its financial position, which is important with the continuing pressures on central grant funding, it again points to weaknesses in budget setting and monitoring.

In previous years we have reported our continuing concerns about the reliability of in year financial reporting and budget setting. Significant changes, such as those impacting council tax and business rates inevitably introduce some uncertainty when setting the budget. However we would have expected that by Quarter 3 the Council would have more accurately forecasted the out-turn than it did in both 2012/13 and 2013/14. The finance team needs to work closely with budget holders to improve the accuracy of both budget setting and the reliability of forecasts, to improve confidence in the process.

The Council is continuing to focus on putting in place changes that will deliver continuous improvements and savings through its transformation and shared services agenda. Opportunities for extending existing arrangements are being considered, such as sharing planning services with Redditch.

The Council is also embarking on some significant capital schemes, including the refurbishment of the high street and town centre improvements, the move to new council offices and a new leisure centre. As part of our work on the value for money conclusion we have considered the arrangements for approving these large projects. We concluded that the Council needs to strengthen its arrangements in relation to the preparation of business cases, setting out clearly the costs and benefits of the project, and in relation to improving the transparency of reporting around such significant decisions.

The Council set new strategic ambitions in 2013. These have yet to be fully translated into overall Council and service plans with associated performance measures. We are aware that some 'measures' and quality standards have been developed and are considered at team and departmental meetings. However these are not built into any Council-wide performance monitoring. Without this, it is difficult for all interested parties to have an understanding of the overall success of the council in delivering its priorities, the quality of services and how effectively it is prioritising its spending.

Further details are included in section 3 of the report.

Controls

The Council's management is responsible for the identification, assessment, management and monitoring of risk, and for developing, operating and monitoring the system of internal control.

Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify any control weaknesses, we report these to the Council. We have not reported any significant control weakness in relation to key financial systems that impacted on our approach to the audit of the financial statements..

We noted that the Council has taken steps to strengthen its risk management arrangements and departments are using the recently updated 4Risk system and this is becoming more embedded in general management arrangements. We highlighted in our interim report that arrangements around corporate risk management should be strengthened. Corporate risks should relate to strategic priorities and should be reported at Executive level periodically, to support appropriate governance arrangements around the Council's key corporate risks.

In our audit plan we referred to weaknesses in a number of areas in our IT risk assessment. We did not judge that these were significant and they did not impact on our planned audit approach.

Internal audit identified some weakness in internal controls, including the absence of in year reconciliation on council tax and NDR and some weakness in payroll arrangements. We designed our audit testing procedures so that we could obtain sufficient assurance in the areas impacted by internal audit findings. As all relevant matters will be reflected in the revised AGS, we do not feel it necessary to repeat their findings in this report. However, it is important that matters are addressed and that those charged with governance (TCWG) have adequate assurance that this is happening.

During 2014/15, it is likely that the Council will be replacing its financial ledger. This will provide a common financial system with Redditch Council and will support a more integrated financial services team. This is a significant project that needs to be properly resourced and managed. In our experience, where such projects are not effectively managed, the consequences can be significant. It is important that management and TCWG receive regular and appropriate assurances around this project, and we would expect internal audit to have a role in providing this assurance.

The way forward

Matters arising from the financial statements audit and review of the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources have been discussed with the Director of Finance and Corporate Resources.

We have made a number of recommendations, which are set out in the action plan in Appendix A. Recommendations have been discussed and agreed with the Director of Finance and Corporate Resources and the finance team.

Acknowledgment

We would like to take this opportunity to record our appreciation for the assistance provided by the finance team and other staff during our audit.

Page 10

Grant Thornton UK LLP
September 2014

Section 2: Audit findings

01. Executive summary

02. Audit findings

03. Value for Money

04. Fees, non audit services and independence

05. Communication of audit matters

We are anticipating issuing an unqualified opinion on the accounts by the 30 September national deadline.

Audit findings

In this section we present our findings in respect of matters and risks identified at the planning stage of the audit and additional matters that arose during the course of our work. We set out on the following pages the work we have performed and findings arising from our work in respect of the audit risks we identified in our audit plan, presented to the Audit board in June 2014. We also set out the adjustments to the financial statements arising from our audit work and our findings in respect of internal controls.

Changes to Audit Plan

We have not made any significant changes to our Audit Plan as previously communicated to you in June except for the areas highlighted below. These are all relatively minor in nature and relate to refinements on our approach to improve the efficiency of our work.

Audit opinion

We anticipate that we will provide the Council with an unmodified opinion. Our audit opinion is set out in Appendix B.

Audit findings against significant risks

"Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, either due to size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty" (ISA 315).

In this section we detail our response to the significant risks of material misstatement which we identified in the Audit Plan. As we noted in our plan, there are two presumed significant risks which are applicable to all audits under auditing standards.

	Risks identified in our audit plan	Work completed	Assurance gained and issues arising
Page 13	1. Improper revenue recognition Under ISA 240 there is a presumed risk that revenue may be misstated due to improper recognition	<ul style="list-style-type: none"> • review and testing of revenue recognition policies • testing of material revenue streams • review of unusual significant transactions 	Our audit work has not identified any issues in respect of revenue recognition.
	2. Management override of controls Under ISA 240 there is a presumed risk of management over-ride of controls	<ul style="list-style-type: none"> • review of accounting estimates, judgements and decisions made by management • testing of journal entries • review of unusual significant transactions] 	Our audit work has not identified any evidence of management override of controls. In particular the findings of our review of journal controls and testing of journal entries has not identified any significant issues. We set out later in this section of the report our work and findings on key accounting estimates and judgments.

Audit findings against other risks

In this section we detail our response to the other risks of material misstatement which we identified in the Audit Plan. Recommendations, together with management responses, are attached at Appendix A. We have made some small amendments to the approach agreed in the audit plan, and this is highlighted below.

Transaction cycle	Description of risk	Work completed	Assurance gained & issues arising
<p>Operating expenses</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 14</p>	<p>Creditors understated or not recorded in the correct period</p>	<p>We have undertaken the following work in relation to this risk:</p> <ul style="list-style-type: none"> • documented our understanding of processes and key controls over the transaction cycle • undertaken walkthrough of the key controls to assess the whether those controls are designed effectively • cut off testing of purchase orders and goods received notes(both before and after year end) – here we have amended our approach by testing from full transactions listings • Review of the completeness of the reconciliations to the purchasing system. 	<p>Our audit work has not identified any significant issues in relation to the risk identified</p>
<p>Employee remuneration</p>	<p>Employee remuneration accrual understated</p>	<p>We have:</p> <ul style="list-style-type: none"> • conducted a walkthrough of the key controls for this system at interim. • reviewed the payroll exception reporting and reconciliations in year to gain assurance over the completeness of employee remuneration recorded in the general ledger • reviewed the completeness of the payroll reconciliation to ensure that information from the payroll system can be agreed to the ledger and financial statements • Tested a sample of payments made in April & May to ensure payroll expenditure is recorded in the correct year – here we have amended our approach to reviewing the full transactions listing rather than a sample. • Undertaken a review of monthly trend analysis of total payroll 	<p>Our audit work has not identified any significant issues in relation to the risk identified</p>

Audit findings against other risks (cont.)

<p>Welfare expenditure</p>	<p>Welfare benefit expenditure improperly computed (Valuation)</p>	<p>We have</p> <ul style="list-style-type: none"> • conducted a walkthrough of the key controls for this system • tested a sample of Council Tax Support for the period to end of February 2014 • tested in accordance with the methodology required to certify the Housing Benefit subsidy claim. • tested Council Tax Discount 	<p>No significant matters have arisen from our work</p>
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Group audit scope and risk assessment



ISA 600 requires that as Group auditors we obtain sufficient appropriate audit evidence regarding the financial information of the components and the consolidation process to express an opinion on whether the group financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework.

Component	Significant?	Level of response required under ISA 600	Risks identified	Work completed	Assurance gained & issues raised
Bromsgrove Arts Development Trust	Yes	targeted	PPE valuation	The Council's interest in the 'Artrix Centre' is limited to an interest in the asset. All other transactions associate with running the centre are within a separate Trust, in which the Council has no interest. Our work has focussed on the valuation of the asset and the capital transactions.	Our audit work has not identified any issues in respect of the valuation of property and the associated capital accounting entries.

Page 16

Accounting policies, estimates & judgements

In this section we report on our consideration of accounting policies, in particular revenue recognition policies, and key estimates and judgements made and included with the Council's financial statements.

Accounting area	Summary of policy	Comments	Assessment
Revenue recognition	<ul style="list-style-type: none"> Accounting policy 1.2 summarises the Council's approach to revenue recognition 	<p>The policy adopted is consistent with the prior year and the approach that is considered to be the industry 'norm'.</p> <p>The policy should reflect all material income streams and we have asked that the policy be updated to reflect council tax and NDR income streams.</p>	 Amber
Judgements and estimates	<p>Assumptions made about sources of estimation uncertainty is covered in note 3 for:</p> <ul style="list-style-type: none"> Pensions liability Arrears/ bad debt provisions Earmarked reserves Provision for business rate appeals 	<p>Pensions liabilities : The council is reliant on the pensions administrator (Worcestershire County Council) and the actuary to provide this estimate. The note adequately describes the basis of the estimate. As part of our work we have considered whether it is appropriate to rely on the council experts for this estimate, and have judged that it is reasonable to do so.</p> <p>Provision for business rate appeals: the estimate has been considered as part of our detailed work on the collection fund. The approach adopted is consistent with our experience at other similar councils and is reasonable. No provision has been made for appeals not yet lodged as the Council has judged that it is not possible to make a reasonable estimate and has thus disclosed the potential for future claims in its contingent liability note.</p>	 Green

Page 17



Assessment

- Marginal accounting policy which could potentially attract attention from regulators
- Accounting policy appropriate and disclosures sufficient



- Accounting policy appropriate but scope for improved disclosure

Accounting policies, estimates & judgements

In this section we report on our consideration of accounting policies, in particular revenue recognition policies, and key estimates and judgements made and included with the Council's financial statements.

Accounting area	Summary of policy	Comments	Assessment
Judgements and estimates - PPE Page 18	<ul style="list-style-type: none"> Note 1.18, outlines the accounting policies associated with PPE. Note 50 of the accounts sets out the Council's rolling programme of revaluations. 	<ul style="list-style-type: none"> We are satisfied that the assets have been valued over a five year period and that the council has materially complied with the requirement that similar classes of assets are valued simultaneously. The Council House is being valued as an operational asset as this is the view of your independent valuer and we have no reason to challenge the assumption. As the asset is significantly empty and a decision has been made to sell the building, we consider that this is a significant assumption and should therefore be included in the significant estimates section of the accounts. 	 amber
Other accounting policies	<ul style="list-style-type: none"> We have reviewed the Council's policies against the requirements of the CIPFA Code and accounting standards. 	<ul style="list-style-type: none"> Stated accounting policies are consistent with CIPFA requirements and our testing has not identified any instance of non compliance with stated policies. 	 green

Assessment

-  Marginal accounting policy which could potentially attract attention from regulators
-  Accounting policy appropriate and disclosures sufficient

-  Accounting policy appropriate but scope for improved disclosure

Adjusted misstatements

No significant adjustments have been made to the draft financial statements as none have been identified during the audit process. Some adjustments have been made to prior year comparators.

Misclassifications & disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Adjustment type	Value £'000	Account balance	Impact on the financial statements
1 Disclosure	Various	Various	There are a number of non material changes to the prior year comparator figures. A list of these has been provided to the finance team and they have agreed to add explanatory notes on these.
2 Disclosure	n/a	Accounting policies	No accounting policy was included on revenue recognition for council tax and business rates. Wording has been agreed with officers.
Page 20 Disclosure	n/a	PPE	A line should be included in critical judgments on the assumptions on the valuation of the Council house.

Unadjusted misstatements

There are no unadjusted misstatements

Internal controls

The purpose of an audit is to express an opinion on the financial statements.

Our audit included consideration of internal controls relevant to the preparation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

	Assessment	Issue and risk	Recommendations
1.	●	A part of our review of the AGS, we noted some areas of the constitution that were out of date. This included financial regulations, Fraud and corruption policy , whistleblowing policy, and the published members allowances scheme.	<ul style="list-style-type: none"> Key documents should be updated as soon as possible. Any changes should be communicated to staff through team meetings and the induction programme. A rolling programme of review of key council documents contained in the constitution should be put in place. This should be extended to include review of general documents and reports retained on the council website, several of which are considerably out of date.
2.	●	At our interim audit , we highlighted that we had identified some weakness in IT controls. Whilst we did not judge these as 'significant' and thus do not impact on our procedures, we have yet to receive a response to that report.	<ul style="list-style-type: none"> Matters raised in our IT review should be responded to by management
3.	●	Bank reconciliation: the reconciliation was overly complicated and included unnecessary processes	<ul style="list-style-type: none"> The bank reconciliation process should be reviewed and streamlined to avoid unnecessary reconciling entries.

Assessment

- Significant deficiency – risk of significant misstatement
- Deficiency – risk of inconsequential misstatement

Other communication requirements

We set out below details of other matters which we are required by auditing standards to communicate to those charged with governance.

	Issue	Commentary
1.	Matters in relation to fraud	<ul style="list-style-type: none"> We have previously discussed the risk of fraud with the Audit Committee in April. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit.
2.	Matters in relation to laws and regulations	<ul style="list-style-type: none"> We are not aware of any significant incidences of non-compliance with relevant laws and regulations.
3.	Written representations	<ul style="list-style-type: none"> A letter of representation has been requested from the Council. In particular, representations will be requested from management in respect of restructuring costs.
4.	Disclosures	<ul style="list-style-type: none"> Our review found no material omissions in the financial statements
5.	Matters in relation to related parties	<ul style="list-style-type: none"> We are not aware of any related party transactions which have not been disclosed
6.	Going concern	<ul style="list-style-type: none"> Our work has not identified any reason to challenge the Council's decision to prepare the financial statements on a going concern basis.

Section 3: Value for Money

01. Executive summary

02. Audit findings

03. Value for Money

04. Fees, non audit services and independence

05. Communication of audit matters

Page 24

Value for Money

Value for money conclusion

The Code of Audit Practice 2010 (the Code) describes the Council's responsibilities to put in place proper arrangements to:

- secure economy, efficiency and effectiveness in its use of resources;
- ensure proper stewardship and governance; and
- review regularly the adequacy and effectiveness of these arrangements.

We are required to give our VFM conclusion based on two criteria specified by the Audit Commission which support our reporting responsibilities under the Code. These criteria are:

The Council has proper arrangements in place for securing financial resilience - the Council has robust systems and processes to manage effectively financial risks and opportunities, and to secure a stable financial position that enables it to continue to operate for the foreseeable future.

The Council has proper arrangements for challenging how it secures economy, efficiency and effectiveness - the Council is prioritising its resources within tighter budgets, for example by achieving cost reductions and by improving efficiency and productivity.

Key findings

Securing financial resilience

We have considered the Council's arrangements to secure financial resilience against the following themes:

- Key financial performance indicators
- Financial governance
- Financial planning
- Financial control

Overall our work led us to conclude that the Council has adequate arrangements to secure financial resilience.

The Council has good levels of general fund reserves, which are well above the minimum set by the Council. Medium-term plans are not reliant on these reserves to balance the budget. Forward plans do include the need to make on-going savings, due to the expected reductions in central government grants.

Audit Commission published performance measures, based on published accounts, show that Council spending and balances are not significantly out of line with similar councils.

Improvements have been made at a service level in risk management and it is clear from presentations to the audit committee that risk management is becoming more embedded in management arrangements. To support good governance, the corporate risk register needs to more closely reflect corporate priorities. Key risks should be periodically considered at CMT and Cabinet as part of the Council's arrangements for managing its risks to delivering corporate priorities.

The Council has once again underspent significantly against the out-turn, forecast at Quarter 3. This was also the case in 2012/13 and 2011/12, indicating that improvements are still needed in the accuracy of forecasting. Better reporting and understanding of savings made against savings plans will help officers and members to understand and challenge the base budget. This remains a significant weakness in arrangements.

Internal audit has highlighted some weakness in internal controls, although overall financial controls in the council are appropriate and satisfactory. It is important that strong financial controls are maintained as services are reviewed as part of the transformation programme, and that any agreed recommendations made by internal audit are not deferred.

Challenging economy, efficiency and effectiveness

We have considered the Council's arrangements to challenge economy, efficiency and effectiveness against the following themes:

- Prioritising resources
- Improving efficiency & productivity

The Council is committed to challenging its services through its transformation programme to achieve efficiencies that are based around improvements to the customer experience. The Council has a track record of delivering budgets with large levels of savings and Members and Directors are confident that the transformation programme will support delivery of future savings.

New strategic purposes were set in July 2013. These were not translated into a strategic or annual plan for 2013/14 or for 2014/15. We have seen that budgets are set with strategic purposes in mind and these appear to influence decisions around investment and savings. However without an annual strategic plan or even a year end service review, it is difficult to assess how effectively the Council is prioritising resources.

Performance measures are being developed to more effectively reflect the new corporate priorities. However there is currently no operational performance management system or routine measurement of the effectiveness of services at a corporate level.

In the past the Council has struggled to demonstrate the level of savings achieved through its transformation programme, in part because the Council's budget and monitoring processes lack transparency. As a result of this the savings delivered by transformation have not been capable of being distinguished from the efficiencies delivered by other budget measures. It is hence difficult to gauge the extent of the cost and quality improvements delivered by transformation, which in turn makes it difficult to assess whether this process will be able to deliver large future cost efficiencies.

The Council is in the process of committing to and implementing a number of large capital schemes. As part of our VFM work, we considered the arrangements that the Council has in place for considering and approving such schemes. In particular we considered the adequacy and transparency of reporting to members prior to the commitment being made.

A full business case should be provided to Members prior to a commitment being made to any large project, so that they are given the opportunity to consider and challenge. We note that in relation to the Council House/Parkside project, no business case was formally considered and approved by Members prior to a commitment being made. This omission is concerning given the scale of undertaking. The purpose of establishing and reporting a business case at the outset of a project is to set out the costs and benefits, so that management and Members are clear about the level of investment and the outcomes to be delivered. This would also set out for instance, the agreed basis of usage in relation to the Council House project, between the Council and its partners. More recently, reports have been presented to Members which provided more detail on the cost and benefits of the project.

It is pleasing to note that more detailed case has been presented to members in relation to the leisure centre, which is supported by reports from a number of external advisors. There are clearly risks associated with the town centre and leisure centre project which are acknowledged in reports and minutes of meetings. The Council will need to make sure there are robust risk management arrangements in place around these projects as they progress.

Overall VFM conclusion

On the basis of our work, and having regard to the guidance on the specified criteria published by the Audit Commission, we are satisfied that in all significant respects the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ending 31 March 2014.

We set out below our detailed findings against six risk areas which have been used to assess the Council's performance against the Audit Commission's criteria. We summarise our assessment of each risk area using a red, amber or green (RAG) rating, based on the following definitions:

Green	Adequate arrangements
Amber	Adequate arrangements, with areas for development
Red	Inadequate arrangements

The table below and overleaf summarises our overall rating for each of the themes reviewed:

Theme	Summary findings	RAG rating 2012-13	RAG rating 2013-14
Page 27 Key indicators of performance	<p>The Council does not routinely report indicators of performance, financial or otherwise to committee. We understand that monitoring is done at service manager level and we have seen some data that is collected. We have obtained some indicators of performance directly from managers around sickness and revenues collection, and these show that the council is performing well in these areas.</p> <p>We have also considered Audit Commission performance profiles which are based on the published annual accounts. Council spending and balances are not significantly different to the average in these indicators.</p> <p>The Council does not currently have any borrowing. There are limited levels of capital reserves and the council is now planning to borrow to finance the capital programme.</p> <p>Overall the Council does not have liquidity issues, and based on the available information financial performance is satisfactory, with adequate levels of general fund balances.</p>	Green	Green
Strategic financial planning	<p>The Council has in place a medium term financial plan, which makes reasonable assumptions about future income and expenditure streams and other factors such as inflation and the impact of known future events.</p> <p>In recent years considerable slippage in the capital programme has occurred, which has happened again this year.</p> <p>The Council set new strategic ambitions in July 2013. These have yet to be translated into annual planning. Service managers are in the process of developing and testing performance measures.</p> <p>The budget process has some regard to strategic ambitions to provide a framework around the budget process and to influence decisions. However without a corporate plan and reported performance measures it is difficult to assess whether the Council's medium term financial plan is linked to its strategic priorities.</p>	Green	Amber

Theme	Summary findings	RAG rating 2012-13	RAG rating 2013-14
<p>Financial governance</p>	<p>There has been a commitment to sharing services between Bromsgrove and Redditch councils which has meant that many services now operate with a single management team and some are fully integrated. This has delivered recurring savings.</p> <p>There is also a strong commitment to transformation principles that are being adopted throughout the council. These factors all indicate that senior management recognise the need to change to both improve services and reduce costs.</p> <p>Whilst budget reporting has improved in terms of narrative, we continue to have concerns about the accuracy of the reporting as once again the outturn was not accurately forecast at Q3 (outturn was significantly better than forecast) This has also been the case for the last two years and as previously reported, this is likely to be due to a number of factors including:</p> <ul style="list-style-type: none"> • Lack of understanding of outturn savings and thus recurring savings being included in following year budgets, possibly leading to inflated budgets being set. This is being reviewed for 14/15 as a means to deliver the current 'unidentified' savings. • Budget holders not accurately forecasting outturn, probably by not declaring underspends until the outturn. <p>Whilst this outcome is positive in terms of the levels of balances held, it leads to a lack of confidence in both budget setting arrangements and financial control. Reporting of the capital programme is not given as high a profile as revenue reporting</p> <p>Financial reports to members are delayed (eg. Q1 report was not reported until September) which lessens their effectiveness as a management tool.</p> <p>Arrangements for risk management have improved year on year due to investment in the process. However the corporate risk register is still not being used as a management tool, to provide assurance around key risks and how they are being mitigated.</p>	<p>Amber</p>	<p>Amber</p>

<p>Financial control</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 29</p>	<p>This part of the assessment considers adequacy of budget setting, savings plan setting and monitoring, finance department resourcing, adequacy of financial systems and internal audit.</p> <p>A key member of the finance team has recently left and the department is currently going through a restructure. This provides some short term risks to both the effectiveness of the department and in the operation of key controls. A new financial ledger is to be implemented in 2014/15 which provides additional risks, that will need to be properly managed. However in the longer term these changes should both deliver savings and lead to a more effective team.</p> <p>Internal audit generally provides an effective service to the Council. There has been some turnover and staff sickness that has in the past led to difficulties delivering the agreed plan. Most of the internal audit plan was delivered by the time the AGS was prepared in June, although ideally the programme should be fully completed by then.</p> <p>Internal Audit has issued a number of reports this year giving moderate, limited and in one case, no assurance. Whilst not all these reports relate to key financial systems, this is slightly worse overall than in the previous year. In some cases, not all of internal audit recommendations have been agreed and implemented due to on-going transformation work.</p>	<p>Green</p>	<p>Green</p>
<p>Prioritising resources</p>	<p>The Council has implemented and continues to consider alternative methods of delivery as indicated by its shared services and transformation programmes. It seems likely that the Council may have to explore further sharing of services due to continuing budget pressures if the quality of services is to be improved and non essential services retained.</p> <p>As referred to under other themes, the Council does not yet have an annual planning process. The budget is set with some consideration of the strategic themes when making budget decisions. However without an annual or other corporate plan with measurable outcomes, it is difficult to assess the success of the council in prioritising its resources in line with strategic ambitions.</p>	<p>Not separately reported</p>	<p>Amber</p>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 30</p> <p>Improving efficiency & productivity</p>	<p>This part of the assessment considers whether costs are understood, delivery of savings , service redesign and effectiveness of key services.</p> <p>There is some overlap with the findings on this theme .</p> <p>It is clear that the Council wants to make changes that will deliver long term benefits to the Council, as this is key to the shared services and the separate transformation agenda. Most organisations will achieve annual savings through a mixture of recurring savings and short term fixes, but it is important that there is a clear understanding of this . It is increasingly important that savings achieved are recurring and that the Council is not reliant on short term fixes .</p> <p>Without an effective performance management system, it is not possible to assess the impact on services of decisions. There is no information on the performance of key services such as planning, leisure and housing as this information is not reported, and in a number of areas not measured. Much of the reported success measures are anecdotal and focus on limited areas of the organisation.</p> <p>However where we have obtained comparative information, eg revenues collection performance, performance is good. We are aware of some slippage in performance where we have undertaken specific work, for example in benefits there has been limited quality checks over at least the last year, although this is to be rectified.</p> <p>Whilst clearly change has occurred and continues that should inevitably improve efficiency and productivity, this is not reported and so it is not possible to measure success.</p>	<p>Not separately assessed</p>	<p>Amber</p>
<p>Management of natural resources</p>	<p>A high level assessment of this area is required this year and we were asked to consider whether the organisation produces reports on how it uses natural resources and whether this affects decision making.</p> <p>Officers were unable to provide specific information on this and thus we have assessed this as amber</p>	<p>Not assessed</p>	<p>Amber</p>

Section 4: Fees, non audit services and independence

01. Executive summary

02. Audit findings

03. Value for Money

04. Fees, non audit services and independence

05. Communication of audit matters

Page 31

Fees, non audit services and independence

We confirm below our final fees charged for the audit

Fees

	Per Audit plan £	Actual fees £
Council audit	64,006	*64,906
Extra fee		
Grant certification	3,872	tbc
Total audit fees	67,878	tbc

Fees for other services

Service	Fees £
None	Nil

Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Auditing Practices Board's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.

We confirm that we have implemented policies and procedures to meet the requirements of the Auditing Practices Board's Ethical Standards.

The Audit Commission determines the scale fee for the audit. They have confirmed that the fee will be increased by £900 for all district councils to reflect the additional work around the new collection fund accounting requirements.

Page 32

Section 5: Communication of audit matters

- 01. Executive summary
- 02. Audit findings
- 03. Value for Money
- 04. Fees, non audit services and independence
- 05. Communication of audit matters**

Page 33

Communication of audit matters to those charged with governance

International Standard on Auditing (ISA) 260, as well as other ISAs, prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table opposite.

The Audit Plan outlined our audit strategy and plan to deliver the audit, while this Audit Findings report presents the key issues and other matters arising from the audit, together with an explanation as to how these have been resolved.

Respective responsibilities

The Audit Findings Report has been prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission (www.audit-commission.gov.uk).

We have been appointed as the Council's independent external auditors by the Audit Commission, the body responsible for appointing external auditors to local public bodies in England. As external auditors, we have a broad remit covering finance and governance matters.

Our annual work programme is set in accordance with the Code of Audit Practice ('the Code') issued by the Audit Commission and includes nationally prescribed and locally determined work. Our work considers the Council's key risks when reaching our conclusions under the Code.

It is the responsibility of the Council to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Council is fulfilling these responsibilities.

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	✓	
Overview of the planned scope and timing of the audit. Form, timing and expected general content of communications	✓	
Views about the qualitative aspects of the entity's accounting and financial reporting practices, significant matters and issues arising during the audit and written representations that have been sought		✓
Confirmation of independence and objectivity	✓	✓
A statement that we have complied with relevant ethical requirements regarding independence, relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged Details of safeguards applied to threats to independence	✓	✓
Material weaknesses in internal control identified during the audit		✓
Identification or suspicion of fraud involving management and/or others which results in material misstatement of the financial statements		✓
Compliance with laws and regulations		✓
Expected auditor's report		✓
Uncorrected misstatements		✓
Significant matters arising in connection with related parties		✓
Significant matters in relation to going concern		✓

Appendices

Page 35

Appendix A: Action plan

Rec No.	Recommendation	Priority	Management response	Implementation date & responsibility
	Financial statements			
	AGS to be updated to reflect the weaknesses in internal audit reports, including reports issued subsequent to the S151 signing the accounts.	medium		
	Bank Reconciliation process should be reviewed and streamlined as it is currently unnecessarily complicated	low		
	Procedures and policies contained in the Constitution should be kept under review on a rolling basis. In particular the Financial regulations and both the fraud and corruption and whistleblowing policies should be brought up to date.	medium		
	TCWG have regular updates on the progress of the ledger implementation project. Independent assurance on this should be provided by Internal audit at key stages in the project.	high		
	Corporate risk register to be better aligned with corporate priorities and to be routinely reported at a senior level including periodic reporting to cabinet	medium		

Page 36

Appendix A: Action plan (cont)

Rec No.	Recommendation	Priority	Management response	Implementation date & responsibility
	VFM conclusion			
Page 37	<p>Undertake a detailed review of 2013/14 outturn, to have a better understanding of where recurring savings can be reflected in the revised 2014/15 budget.</p> <p>14/15 budget setting should include a review of vacancies and whether these should now be reflected in base budgets.</p>	high		
	Consider how the Council can both accelerate and improve the accuracy of in year financial reporting.	high		
	Accelerate the work around developing performance measures and embedding them into routine committee reporting procedures, and an operational performance management system. Ideally this should be in place for the 15/16 financial year, to support an annual plan- which should also be in place for the start of that year.	high		

Appendix B: Audit opinion

We anticipate we will provide the Council with an unmodified audit report

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS BROMSGROVE DISTRICT COUNCIL

Opinion on the financial statements

We have audited the financial statements of Bromsgrove District Council for the year ended 31 March 2014 under the Audit Commission Act 1998. The financial statements comprise the Movement in Reserves Statement, the Group Movement in Reserves Statement, the Comprehensive Income and Expenditure Statement, the Group Comprehensive Income and Expenditure Statement, the Balance Sheet, the Group Balance Sheet, the Cash Flow Statement and Collection Fund and the related notes.

The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2013/14.

This report is made solely to the members of Bromsgrove District Council in accordance with Part II of the Audit Commission Act 1998 and for no other purpose, as set out in paragraph 48 of the Statement of Responsibilities of Auditors and Audited Bodies published by the Audit Commission in March 2010. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's Members as a body, for our audit work, for this report, or for the opinions we have formed.

Respective responsibilities of the Executive Director and auditor

As explained more fully in the Statement of the Executive Director (Finance and Resources) Responsibilities, the Executive Director (Finance and Resources) is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom, and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.

Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of: whether the accounting policies are appropriate to the Authority and Group's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Executive Director (Finance and Resources); and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the explanatory foreword to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by us in the course of performing the audit. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

Opinion on financial statements

In our opinion the financial statements:

- give a true and fair view of the financial position of Bromsgrove District Council as at 31 March 2014 and of its expenditure and income for the year then ended;
- give a true and fair view of the financial position of the Group as at 31 March 2014 and of its expenditure and income for the year then ended; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2013/14 and applicable law.

Opinion on other matters

In our opinion, the information given in the explanatory foreword for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we report by exception

We report to you if in our opinion the annual governance statement does not reflect compliance with ‘Delivering Good Governance in Local Government: a Framework’ published by CIPFA/SOLACE in June 2007; we issue a report in the public interest under section 8 of the Audit Commission Act 1998; we designate under section 11 of the Audit Commission Act 1998 any recommendation as one that requires the Authority to consider it at a public meeting and to decide what action to take in response; or we exercise any other special powers of the auditor under the Audit Commission Act 1998.

We have nothing to report in these respects.

Conclusion on the Authority’s arrangements for securing economy, efficiency and effectiveness in use of resources

Respective responsibilities of the Authority and the auditor

The Authority is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

We are required under Section 5 of the Audit Commission Act 1998 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The Code of Audit Practice issued by the Audit Commission requires us to report to you our conclusion relating to proper arrangements, having regard to relevant criteria specified by the Audit Commission.

We report if significant matters have come to our attention which prevent us from concluding that the Authority has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Authority’s arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

Scope of the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We have undertaken our audit in accordance with the Code of Audit Practice, having regard to the guidance on the specified criteria, published by the Audit Commission in October 2013, as to whether the Authority has proper arrangements for:
securing financial resilience; and
challenging how it secures economy, efficiency and effectiveness.

The Audit Commission has determined these two criteria as those necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether the Authority put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2014.

We planned our work in accordance with the Code of Audit Practice. Based on our risk assessment, we undertook such work as we considered necessary to form a view on whether, in all significant respects, the Authority had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

Conclusion

On the basis of our work, having regard to the guidance on the specified criteria published by the Audit Commission in October 2013, we are satisfied that, in all significant respects, *Bromsgrove District Council* put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2014.

Certificate

We certify that we have completed the audit of the financial statements of Bromsgrove District Council in accordance with the requirements of the Audit Commission Act 1998 and the Code of Audit Practice issued by the Audit Commission.

Phil Jones
Director
for and on behalf of Grant Thornton UK LLP, Appointed Auditor

Page 39

Agenda Item 3



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Appendix 2

*****Prepare on client letterhead*****

Grant Thornton UK LLP
[Click [here](#) and enter **office address**]

[Click [here](#) and enter **date of letter**]

Dear Sirs

[Click here and enter name of Council]
Financial Statements for the year ended 31 March 2014

This representation letter is provided in connection with the audit of the financial statements of [Click [here](#) and enter **client name**] for the year ended 31 March 2014 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view in accordance with International Financial Reporting Standards.

We confirm that to the best of our knowledge and belief having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

Financial Statements

- i We have fulfilled our responsibilities for the preparation of the financial statements in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in Great Britain ("the Code") as adapted for International Financial Reporting Standards; in particular the financial statements give a true and fair view in accordance therewith.
- ii We have complied with the requirements of all statutory directions and these matters have been appropriately reflected and disclosed in the financial statements.
- iii The Council has complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance.
- iv We acknowledge our responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.
- v Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable.
- vi We are satisfied that the material judgements used by us in the preparation of the financial statements are soundly based, in accordance with the Code, and adequately disclosed in the financial statements. There are no further material judgements that need to be disclosed.
- vii Except as stated in the financial statements:
 - a there are no unrecorded liabilities, actual or contingent

- b none of the assets of the Council has been assigned, pledged or mortgaged
- c there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.
- viii We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme liabilities for IAS19 disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant retirement benefits have been identified and properly accounted for.
- ix Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.
- x All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.
- xi Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.
- xii We have not adjusted the misstatements brought to our attention in the Audit Findings Report, as they are considered to be immaterial to the results of the Council and its financial position at the year-end. The financial statements are free of material misstatements, including omissions.
- xiii We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.
- xiv We believe that the Council's financial statements should be prepared on a going concern basis on the grounds that current and future sources of funding or support will be more than adequate for the Council's needs. We believe that no further disclosures relating to the Council's ability to continue as a going concern need to be made in the financial statements.
- xv In relation to the valuation of the Council House we believe that the valuation is accurate and has been prepared based on professional valuation advice
- xvi There is no requirement for redundancy provisions at the present time. No decisions have been made since the end of the financial year that would require a provision to be set aside.

Information Provided

- xvii We have provided you with:
 - a access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
 - b additional information that you have requested from us for the purpose of your audit; and
 - c unrestricted access to persons within the Council from whom you determined it necessary to obtain audit evidence.
- xviii We have communicated to you all deficiencies in internal control of which management is aware.

- xix All transactions have been recorded in the accounting records and are reflected in the financial statements.
- xx We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- xxi We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the Council and involves:
 - a management;
 - b employees who have significant roles in internal control; or
 - c others where the fraud could have a material effect on the financial statements.
- xxii We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the Council's financial statements communicated by employees, former employees, regulators or others.
- xxiii We have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.
- xxiv We have disclosed to you the entity of the Council's related parties and all the related party relationships and transactions of which we are aware.
- xxv We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

Annual Governance Statement

- xxvi We are satisfied that the Annual Governance Statement (AGS) fairly reflects the Council's risk assurance and governance framework and we confirm that we are not aware of any significant risks that are not disclosed within the AGS.

Approval

The approval of this letter of representation was minuted by the **[Council's Cabinet/Audit Committee]** at its meeting on **[Click here and enter date]**.

Signed on behalf of the Board

Name.....

Position.....

Date.....

Name.....

Position.....

Date.....

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CABINET

24TH SEPTEMBER 2014

ALLOCATION POLICY RE GRANT FUNDING TO WARD MEMBERS

Relevant Portfolio Holder	Cllr Michael Webb
Portfolio Holder Consulted	Yes
Relevant Head of Service	Jayne Pickering – Executive Director Finance and Resources
Wards Affected	All
Ward Councillor Consulted	Yes

1. SUMMARY OF PROPOSALS

- 1.1 This report proposes the policy to distribute funds to ward members to utilise within a ward budget scheme as approved at the Council meeting on 26th February 2014.
- 1.2 The proposed scheme will enable the allocation of the £45k funds received by the Council as part of the Government settlement for 2014/15 in relation to the impact on Parish Councils from the Council Tax Support Scheme to be allocated across the District via ward members.

2. RECOMMENDATIONS

It is proposed that Cabinet RECOMMEND

- 2.1 Members note the decision of 26th February 2014 to allocate the sum of £45,000 equally to ward councillors to spend within their wards and in the context of this more detailed report confirm this and their agreement to the introduction of the Bromsgrove District Ward Members Fund Policy detailed in Appendix 1.
- 2.2 That delegation is given to the Executive Director of Finance and Resources to approve requests and make the formal payments in relation to the allocation of funds.

3. KEY ISSUES

Financial Implications

- 3.1 Members will be aware that in 2013/14 £52k was allocated by Central Government to mitigate the impact of the changes to Council Tax support for Parish Councils. Following approval by Council £40k of this was distributed to Parish Councils in 2013/14 to fund the actual impact

CABINET

24TH SEPTEMBER 2014

arising from the changes. The remaining £12k was used to fund projects in non parished areas eg Town Centre bridge repairs.

- 3.2 In 2014/15 the Government stated that the parish grant would continue to be included in the Settlement but there would be no separate amount detailed to show the actual figure. An estimate of £45k (from the prior year £52k) was made to reflect the overall reduction in Grant Settlement for 2014/15 for the District. This figure represented the amount that would be due to Parish Councils to cover the shortfall in Council Tax income as a result of the changes to the Discount Scheme. Without the funding Parishes may have to further increase their precepts to offset the shortfall.
- 3.3 As members will be aware this sum was identified within the Medium Term Financial Plan agreed by Council in February 2014 as £45,000.
- 3.4 At the meeting of the Cabinet on 26th February members chose to discuss how this amount could be allocated and this resulted in a recommendation to Council on 26th February 2014. Members discussed this proposal at Full Council and approved that the funds would be allocated equally across all members to undertake projects within their wards that would benefit the residents and wider community and help deliver the Councils strategic purposes. This would mean that the parishes would not receive this additional funding to support the loss of council tax in the parish.
- 3.5 Members are advised that this decision has not yet been implemented as it was felt that a more detailed proposal detailing the mechanism by which this fund allocation could be achieved required member approval
- 3.6 Ward members funds are intended to enhance ward councillors' community leadership role and to support the strategic purposes of Bromsgrove District. Ward members funds are intended to provide ward councillors with a dedicated and flexible resource with which to address specific local priorities.
- 3.7 The total per member would be £1,155 (£45,000 / 39) for use in 2014/15. The funding will need to be spent before the end of the current financial year.
- 3.8 There are a number of options that could be available for members in the use of the funds :
 - Individual allocation – if there is a specific project/s that a ward member wishes to fund the allocation of £1,155 will be paid over to the organisation that is providing the project.

CABINET

24TH SEPTEMBER 2014

- Pooled ward funds - It is anticipated that ward members will have the ability to “pool” their resources to provide more financial support towards a particular scheme. This may be within a ward and will need approval from each ward councillor
- Pooled funds across wards/ boundaries – the pooling of funding can be across ward boundaries as long as there is evidence that there is a need for a particular project/ service across the wards. Again this will have to be approved by each member involved;
- Where relevant, funding to be pooled across parishes to support wider parish initiatives

3.9 It is proposed that the Executive Director of Finance and Resources following consultation with the Portfolio Holder for Finance assess the merits of each request against the strategic purposes of the Authority and agree the payments for the projects proposed. Appendix 1 details the draft policy and procedures that will be followed for agreement and payment of funds for members consideration.

Legal Implications

3.10 The scheme as proposed complies with relevant legislation. Members will be aware that the DCLG Minister Brandon Lewis wrote to local authorities in initially in January 2014 and again in February 2014 on the issue of localised council tax support. Specifically the minister reminded local authorities that it was the government’s intention that part of the funding provided to local authorities in respect of localised tax support should be passed down to parish and town councils. Copies of both of the letters are attached for members reference at Appendix 2 & 3. Officers have considered the contents of the letter and the written ministerial statement made to Parliament on 5th February 2014. However, whilst the minister has articulated a view this does not have the effect of legally binding the Council to distribute the money to Parishes. To do this would have required the government to enact specific legislation which it did not do. Whilst the vast majority of local authorities have distributed the monies to parishes, there are a small minority of Councils (15 Councils - per National Association of Local Councils) who have chosen to proceed with alternative schemes.

Service / Operational Implications

3.9 There are no specific service operations as the funds are to be requested and utilised by the ward members.

CABINET

24TH SEPTEMBER 2014

Customer / Equalities and Diversity Implications

- 3.10 It is assumed that the funding will be used by ward members to support projects for their residents and community.

4. RISK MANAGEMENT

- 4.1 The risks identified in relation to legal challenge of the principle of allocating the funds to ward councillors are set out at 3.8 above. In addition there is a risk that approving an alternative scheme for distributing the funds which does not reflect the original intention of the grant, will result in a detrimental impact on the relationship between the Parishes and the District Council.

5. APPENDICES

Appendix 1 – Proposed Bromsgrove District Ward Members Fund Policy

Appendix 2 – Letter from Brandon Lewis MP dated 6 January 2014

Appendix 3 – Letter from Brandon Lewis MP dated 21 February 2014

6. BACKGROUND PAPERS

Written statement to Parliament: Final local government finance statement 2014 to 2015

7. KEY

N/A

AUTHOR OF REPORT

Name: Jayne Pickering

E Mail: j.pickering@bromsgroveandredditch.co.uk

Tel: [01527 881207](tel:01527881207)

Bromsgrove District Ward Members Fund Policy

Bromsgrove District Council has agreed that an allocation of funding will be distributed for ward members to work within the District to improve facilities and outcomes for the community.

Each Councillor has £1,155 for 2014/15 which he or she can recommend to allocate to projects and/or services within their ward. These must support the delivery of the Council's strategic purposes:

- Keep my place safe and looking good
- Provide good things for me to see, do and visit
- Help me find somewhere to live in my locality
- Help me be financially independent
- Help me run a successful business

The fund which has been provided for 2014-15 financial year will need to be spent by the end of the financial year.

Principles

The Ward Members Fund will operate in accordance with the following principles:

(a) Projects should help fulfil the Council's Strategic Purposes

(b) Projects should improve the economic, social or environmental well-being of an area or otherwise have a clear benefit to the local community.

(c) There is a minimum threshold of £100 for any application under the scheme. This is to ensure that the cost of administering the scheme does not become overly burdensome and costly for the Council.

(d) Capital Projects for equipment and one off costs are encouraged. However, any ongoing revenue costs associated with, or arising from, a project will not be funded by the District Council and alternative funding arrangements should be sought.

(e) Bromsgrove District Council must have the legal power to fund any proposed project.

(f) All applications for funding must be made in writing on the approved form and be authorised by the Executive Director of Finance and Resources and the Portfolio holder for Finance.. Members will be advised of the reasons for the rejection of any projects.

(g) Applications must demonstrate the consultation that has been undertaken with ward residents, businesses, Parish or Town Councils, voluntary/community bodies and/or other partners.

(h) Projects which pool the funds of different members either within a ward, across Ward Boundaries or parishes are encouraged.

Agenda Item 5

(i) Contributions to projects which have District wide benefit are permissible, provided that applications to use the fund in this way are able to demonstrate the value of the project to the particular Ward area.

(j) Any underspend(s) (ie, uncommitted funds) cannot be carried forward. An exception to this is in 2014/15 whereby the policy was not agreed until later in the financial year.

What will not be covered by Ward Funding

The following will not be covered by Ward Members Funding:

- (a) Ongoing revenue or maintenance costs.
- (b) Insurance, planning etc. application costs, solicitors or other fees.
- (c) Donations to individuals.
- (d) Donations to commercial bodies or events.
- (e) Direct staffing costs.

Application Process

Any application to spend funds in the members ward must be made on the form provided and submitted to the Executive Director Finance and Resources. Based on the information provided and following consultation with the Portfolio holder for Finance, a decision will be made on whether the proposal is reasonable and lawful.

Forms can be submitted electronically via the Council's e-mail account only, or in paper with the necessary signature/s.

Applications direct from organisations will not be considered.

Funds will not be paid to Councillors but direct to the project/organisation nominated on the form.

Do not include account details on the submission form. If the payee's details are not contained within the Council's financial system they will be contacted directly in order that they provide us with their account details.

Payment will be made by BACS Transfer as it is a secure method of making payment and is cost effective to the Council.

Be clear about how the money will be spent

A clear statement will be required as to how the money will be spent and how it would support the delivery of the Council's strategic purposes and benefit the members of the community. It is anticipated that there will be evidence that the service/ project is required by the community / residents and that once implemented there is a clear benefit that can also be evidenced.

The application will only be cleared for payment if this is clear and officers can see that it is appropriate and legal.

Agenda Item 5

Once an application has been agreed it will be held for public inspection (on request) at the Council House for 6 years and a summary will be published on the Council's website each April.

A quarterly update will be made available to Councillors on the spend / balance of their fund.

Declarations of Interest

You need to declare that you have no disclosable pecuniary interest in the proposal (this includes the interests of spouse/partner as well as you) – and/or, if another disclosable interest exists, make a clear statement as to the type and nature of the interest.

No organisation will be able to benefit from the funding if you hold a disclosable pecuniary interest.

Being appointed to a particular body by the District Council should not normally create a disclosable interest. However, each case must be considered individually and early advice should be sought on the nature of any potential interest.

Joint Bids /Cross Ward Boundary Bids

Bids can be made by Councillors putting their ward funding together. This could be to generate greater benefits across more than one ward if it is clear that there is a greater need for this project / service to be implemented across ward boundaries.

One form can be submitted by a lead member setting out the joint bid and confirmation will be required (either by email or countersignature) by the other councillors that they:

- agree to the submission;
- confirm their financial contribution and
- confirm the declaration

Payments for joint bids will only be processed when all councillors have responded.

Publicity

Any publicity arising from use of the Fund should not be party political and should refer to the District Council's contribution. The Ward Councillor/s is responsible for ensuring that any publicity complies with this.

Be clear that the payment is from the District Council and not you individually.

The scheme will be suspended during any periods of purdah relating to the District Council elections.

Audit

The Ward Members Fund can be subject to review by the council's Internal Audit service to ensure financial probity and value for money in how public money is spent. Appropriate records should be kept by all applicants in case their application is audited.

Appropriate records will be kept by officers of the funding approved and expenditure incurred by the Council. Every project (both approved and rejected) must have a completed application form and a record of the decision taken.



**Department for
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06 January 2014

Dear Leader,

The Government's written ministerial statement, laid in parliament on 18th December, set out clearly the Government's intention that the element of localised council tax support funding provided to local authorities which reflects reductions in town and parish tax bases should be passed down to those councils. I am writing to bring this to your attention, and to emphasise the importance of billing authorities and town and parish councils working together to agree this level of funding. I attach a copy of the statement and the link to it in Hansard.

<http://www.parliament.uk/documents/commons-vote-office/December%202013/16%20December/8.%20DCLG%20LG%20Finance.pdf>

I wrote on this issue in 2012 and I am encouraged that statistics recently published show that 98 per cent of the funding attributable to parish and town councils was passed down for 2013-14.

<https://www.gov.uk/government/publications/local-authority-revenue-expenditure-and-financing-england-2013-to-2014-individual-local-authority-data>

In 2014-2015, the funding provided to local authorities in respect of local council tax support will be £3.3bn, the same amount as for 2013-14. As part of our move to a more flexible local government funding system, the LCTS funding and the town and parish council element within it is not separately identified at a local authority level, but forms part of the overall funding available to local authorities. However, the fact that the town and parish element of the funding is not separately identified and is not ring-fenced should not be used as an excuse to avoid passing down funding, or to avoid proper engagement with parish and town councils.

The Government believes that as the tier of local government closest to their communities, parish and town councils have a key role to play in our vision for localism and the Big Society. Parish councils provide communities with a democratically accountable voice and a structure for taking community action. We want to help parish councils take on a greater service delivery role for their local communities, and use the community rights available to them through the Localism Act 2011.

BRANDON LEWIS MP



Department for
Communities and
Local Government

Leaders of all Local Authorities

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21 February 2014

Localising council tax support grant

I am writing to follow up my letter of 6th January in which I set out the Government's position on the passing down of the localised council tax support grant to parish and town councils.

In the Government's written ministerial statement, laid in parliament on 5th February (link below), I made it clear that the Government's intention was that part of the funding provided to local authorities in respect of the localised council tax support should be passed down to parish and town councils.

<http://www.publications.parliament.uk/pa/cm201314/cmhansrd/cm140205/wmstext/140205m0001.htm#14020567000002>

Following my earlier letter, I am disappointed to learn from the National Association of Local Councils (NALC) that a number of authorities are refusing to pass down any such funding. Without this funding, Parishes will be under pressure to increase their council tax precept in order to fill the void or to scale back the services they provide. In the spirit of localism I would therefore encourage you to pass down funding to avoid indirectly putting pressure on your council taxpayers. However, if an authority does insist on not passing down funding I would expect the authority to justify to their council taxpayer as to the reasons why.

BRANDON LEWIS MP