

Audit and Inspection Plan

October 2007



Audit and Inspection Plan

Bromsgrove District Council

Audit 2007/08

External audit is an essential element in the process of accountability for public money and makes an important contribution to the stewardship of public resources and the corporate governance of public services.

Audit in the public sector is underpinned by three fundamental principles:

- auditors are appointed independently from the bodies being audited;
- the scope of auditors' work is extended to cover not only the audit of financial statements but also value for money and the conduct of public business; and
- auditors may report aspects of their work widely to the public and other key stakeholders.

The duties and powers of auditors appointed by the Audit Commission are set out in the Audit Commission Act 1998 and the Local Government Act 1999 and the Commission's statutory Code of Audit Practice. Under the Code of Audit Practice, appointed auditors are also required to comply with the current professional standards issued by the independent Auditing Practices Board.

Appointed auditors act quite separately from the Commission and in meeting their statutory responsibilities are required to exercise their professional judgement independently of both the Commission and the audited body.

Status of our reports

The Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission explains the respective responsibilities of auditors and of the audited body. Reports prepared by appointed auditors are addressed to non-executive directors/members or officers. They are prepared for the sole use of the audited body. Auditors accept no responsibility to:

- any director/member or officer in their individual capacity; or
- any third party.

Copies of this report

If you require further copies of this report, or a copy in large print, in Braille, on tape, or in a language other than English, please call 0844 798 7070.

© Audit Commission 2007

For further information on the work of the Commission please contact:

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

Tel: 020 7828 1212 Fax: 020 7976 6187 Textphone (minicom): 020 7630 0421

www.audit-commission.gov.uk

Contents

Introduction	4
Responsibilities	4
CPA and inspection	6
Work under the Code of Audit Practice	9
Financial statements	9
Use of resources	9
Data quality	10
Best value performance plan	11
Assessing risks	12
Work specified by the Audit Commission	13
Whole of government accounts (WGA)	13
National Fraud Initiative	13
Voluntary improvement work	14
Certification of grant claims and returns	15
The audit and inspection fee	16
Other information	17
The audit and inspection team	17
Independence and objectivity	17
Quality of service	18
Planned outputs	18
Appendix 1 – Initial risk assessment – use of resources	19
Appendix 2 – Audit and inspection fee	22
Specific audit risk factors	23
Assumptions	23
Specific actions Bromsgrove District Council could take to reduce its audit and inspection fees	24
Process for agreeing any changes in audit fees	24
Appendix 3 – Independence and objectivity	25

Introduction

- 1 This plan has been developed by the Relationship Manager and the appointed auditor. It sets out the audit and inspection work that we propose to undertake for the 2007/08 financial year. The plan is based on the Audit Commission's risk-based approach to audit planning and the requirements of Comprehensive Performance Assessment (CPA). It reflects:
 - audit and inspection work specified by the Audit Commission for 2007/08;
 - current national risks relevant to your local circumstances; and
 - your local risks and improvement priorities.
- 2 Your Relationship Manager will continue to help ensure further integration and co-ordination with the work of other inspectorates.
- 3 As we have not yet completed our audit for 2006/07, the audit planning process for 2007/08, including the risk assessment, will continue as the year progresses, and the information and fees in this plan will be kept under review and updated as necessary.
- 4 Your appointed auditor for 2007/08 has changed. Your former appointed auditor from KPMG is however, best placed to complete a range of work with the Council. This work will include the audit opinion for 2006/07, the 2007 use of resources assessment and the assessment of the arrangements for Data Quality.

Responsibilities

- 5 We comply with the statutory requirements governing our audit and inspection work, in particular:
 - the Audit Commission Act 1998;
 - the Local Government Act 1999 (best value inspection and audit); and
 - the Code of Audit Practice.
- 6 The Code of Audit Practice (the Code) defines auditors' responsibilities in relation to:
 - the financial statements (including the statement on internal control (SIC)); and
 - the audited body's arrangements for securing economy, efficiency and effectiveness in its use of resources.

- 7 The Audit Commission's Statement of responsibilities of auditors and of audited bodies sets out the respective responsibilities of the auditor and the Council. The Audit Commission has issued a copy of the Statement to every audited body.
- 8 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end, and our audit work is undertaken in the context of these responsibilities.

CPA and inspection

- 9 The Audit Commission's CPA and inspection activity is underpinned by the principle of targeting our work where it will have the greatest effect, based upon assessments of risk and performance.
- 10 The Council's CPA category is therefore a key driver in the Commission's inspection planning process. The Council's first full CPA was conducted in 2007. The CPA assessment was on site in February 2007 and was published in June 2007 and this resulted in a categorisation of 'poor'. The key strengths in the Council's performance included the following.
 - Council leadership has a clear idea about what it wants to achieve and is self aware about the scale of the task required if the Council is to achieve minimum standards.
 - Some recent positive progress in addressing area of poor performance.
 - Significant improvement in financial management.
- 11 At the time of the inspection, there were some important areas for improvement in the Council's performance and there was too much complacency about the changes required to achieve the required improvements in performance. These included the following.
 - Overall performance remains below acceptable standards - service performance is poor and recent improvements in some areas have yet to be experienced by the public.
 - There is not yet an adequate vision for the area in place and stakeholders (partners, councillors, partners and the wider public) are not clear about the Council's aims.
 - The relationship with the County Council is not effective.
 - Priorities are not sufficiently specific and limited progress in using these to allocate resources.
 - Many councillors have a poor understanding of their role, a lack of trust between some councillors and staff and this has had a destabilising effect and has damaged the Council's reputation.
 - Over reliance on key senior individuals to provide leadership resulting in significant risks to the sustainability of capacity.
 - Performance management is not yet embedded and there are no processes in place for managing partnerships. The quality of management information is poor and the processes for ensuring value for money are not robust.

- 12 However, since the publication of the report there has been steady progress and a number of changes. These include the following.
- The improvement plan is being implemented successfully, the Performance Management Board noted that for the 159 actions highlighted for July within the plan, 95.6 per cent of the Improvement Plan is on target.
 - A senior management restructure to increase capacity at a senior level and the Council has set up an extensive training programme for members which would have a big impact.
 - Early draft performance indicators for 2006/07 show that Bromsgrove is improving faster than other councils, though from a low base line position. In 2007/08 to date 61 per cent of the BVPI's reported are projected to be above the median.
 - Inter authority working is moving forward, with for instance currently a Bromsgrove council officer is undertaking procurement for Redditch, Wychavon and an Oxfordshire authority.
 - The 2006/07 accounts have been closed on time with an unqualified opinion but VFM will have a qualified opinion.
- 13 Given the Council's CPA category and the risks associated with many of the projects in the improvement plan, our audit and inspection activity will focus on these risks with particular attention to the sustainability of improvements made. On the basis of our planning process we have identified where our inspection activity will be focused for 2007/08 as follows.

Table 1 Summary of inspection activity

Inspection activity	Reason/impact
Relationship Manager (RM) role	To act as the Commission's primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Direction of travel (DoT) assessment	An annual assessment, carried out by the RM, of how well the Council is securing continuous improvement. The DoT statement will be reported in the annual audit and inspection letter. The DoT assessment summary will be published on the Commission's website.

8 Audit and Inspection Plan | CPA and inspection

Inspection activity	Reason/impact
Inspection of Culture Service	The plan for 2006/07 included an inspection of culture services. This inspection was not completed because of the Council's request for a CPA. In the light of the issues identified by the CPA we no longer propose to carry out this inspection. We will instead use this resource to undertake an assessment at a senior level of the council's capacity and governance to support the Council's improvement priorities. The direction of travel assessment will include some extra focus on this.
Inspection of strategic housing	As a consequence of the 0 star inspection on housing in 2006 we will undertake a further inspection in 2007/08.

Work under the Code of Audit Practice

Financial statements

- 14 We will carry out our audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).
- 15 We are required to issue an opinion on whether the financial statements present fairly, in accordance with applicable laws and regulations and the Statement of Recommended Practice on Local Authority Accounting in the United Kingdom 2007, the financial position of the Council as at 31 March 2008 and its income and expenditure for the year.
- 16 We are also required to review whether the SIC has been presented in accordance with relevant requirements, and to report if it does not meet these requirements or if the SIC is misleading or inconsistent with our knowledge of the Council.

Use of resources

Value for money conclusion

- 17 The Code requires us to issue a conclusion on whether the Council has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. This is known as the value for money conclusion. The Code also requires auditors to have regard to a standard set of relevant criteria, issued by the Audit Commission, in arriving at their conclusion.
- 18 In meeting this responsibility, we will review evidence that is relevant to the Council's corporate performance management and financial management arrangements. Where relevant work has been undertaken by other regulators we will normally place reliance on their reported results to inform our work.
- 19 We will also follow up our work from previous years to assess progress in implementing agreed recommendations.

Use of resources assessment

- 20 The Audit Commission has specified that auditors will complete a use of resources assessment for 2007. The assessment focuses on the importance of having sound and strategic financial management to ensure that resources are available to support the Council's priorities and improve services.
- 21 The work required to arrive at the use of resources assessment is fully aligned with that required to arrive at the auditor's 2006/07 value for money conclusion. Consequently in order to ensure that this work is delivered in the most efficient manner the Audit Commission has determined that the outgoing auditors KPMG will undertake this work and charge a separate fee accordingly.

- 22 KPMG will arrive at a score of 1 to 4, based on underlying key lines of enquiry, for each of the following themes.

Theme	Description
Financial reporting	<ul style="list-style-type: none"> • Preparation of financial statements. • External reporting.
Financial management	<ul style="list-style-type: none"> • Medium-term financial strategy. • Budget monitoring. • Asset management.
Financial standing	<ul style="list-style-type: none"> • Managing spending within available resources.
Internal control	<ul style="list-style-type: none"> • Risk management. • System of internal control. • Probity and propriety.
Value for money	<ul style="list-style-type: none"> • Achieving value for money. • Managing and improving value for money.

- 23 We will report details of the scores and judgements made to the Council. The scores will be accompanied, where appropriate, by recommendations of what the Council needs to do to improve its services.
- 24 The auditor's scores are reported to the Commission and are used as the basis for its overall use of resources judgement for the purposes of CPA.

Data quality

- 25 The Audit Commission has specified that auditors will be required to undertake audit work in relation to data quality. This is based on a three-stage approach covering:
- stage 1 - management arrangements;
 - stage 2 - completeness check; and
 - stage 3 - risk-based data quality spot checks of a sample of performance indicators.

- 26 As with the use of resources work the Audit Commission has determined that the 2007 judgement should be undertaken by the outgoing auditor, KPMG. The work at stage 1 will link to KPMG's review of the Council's arrangements to secure data quality as required for our value for money conclusion and, together with the results of stage 2, will inform the risk assessment for the detailed spot check work to be undertaken at stage 3. The results of the work at stage 3 will inform the Commission's CPA assessment.
- 27 Our fee estimate reflects an assessment of risk in relation to the Council's performance indicators. This risk assessment may change depending on our assessment of your overall management arrangements at stage 1 and we will update our plan accordingly, including any impact on the fee.

Best value performance plan

- 28 KPMG will carry out an audit of your best value performance plan (BVPP) and report on whether it has been prepared and published in accordance with legislation and statutory guidance.

Assessing risks

- 29 The Audit Commission is committed to targeting its work where it will have the greatest effect, based upon assessments of risk and performance. This means planning our audit work to address areas of risk relevant to our audit responsibilities and reflecting this in the audit fees. It also means making sure that our work is co-ordinated with the work of other regulators, and that our work helps you to improve.
- 30 Our risk assessment process starts with the identification of the significant financial and operational risks applying at the Council with reference to:
- our cumulative knowledge of the Council;
 - planning guidance issued by the Audit Commission;
 - the specific results of previous and ongoing audit work;
 - interviews with Council officers;
 - liaison with internal audit; and
 - the results of other review agencies' work where relevant.

We have not included a risk assessment for our audit of the financial statements as many of the specific risks may not become apparent until after the 2006/07 audit has been completed by KPMG. We will issue a separate opinion audit plan for our audit of the financial statements in November 2007.

- 31 For each of the significant risks identified in relation to our use of resources work, we consider the arrangements put in place by the Council to mitigate the risk, and plan our work accordingly.
- 32 Our initial risk assessment for use of resources work is provided in Appendix 1. This will be updated through our continuous planning process as the year progresses.

Work specified by the Audit Commission

Whole of government accounts (WGA)

- 33 We will be required to review and report on your WGA consolidation pack in accordance with the approach agreed with HM Treasury and the National Audit Office which is proportionate to risk.

National Fraud Initiative

- 34 The Council participates in the National Fraud Initiative which is the Audit Commission's computerised data matching exercise designed to detect fraud perpetrated on public bodies. This work will be carried out by an individual appointed to assist in the audit of the Council's accounts (in accordance with section 3(9) of the Audit Commission Act 1998).

Voluntary improvement work

- 35 We are not proposing to do any voluntary improvement work at Bromsgrove District council during 2007/08.

Certification of grant claims and returns

36 We will continue to certify the Council's claims and returns on the following basis:

- claims below £100,000 will not be subject to certification;
- claims between £100,000 and £500,000 will be subject to a reduced, light-touch certification; and
- claims over £500,000 will be subject to a certification approach relevant to the auditor's assessment of the control environment and management preparation of claims. A robust control environment would lead to a reduced certification approach for these claims.

The audit and inspection fee

- 37 The details of the structure of scale fees are set out in the Audit Commission's work programme and fee scales 2007/08. Scale fees are based on a number of variables, including the type, size and location of the audited body.
- 38 The indicative fee for audit and inspection work included to be conducted by the Audit Commission in this audit and inspection plan for 2007/08 is £111,250 which compares with the actual fee of £112,951 paid for 2006/07.
- 39 Further details are provided in Appendix 2 which includes a breakdown of the fee; specific audit risk factors; the assumptions made when determining the audit fee, for example, the timeliness and quality of draft accounts presented for audit and the supporting working papers; specific actions Bromsgrove District Council could take to reduce its audit and inspection fees; and the process for agreeing any changes to the fee. The fee includes all work identified in this plan unless specifically excluded.
- 40 In addition we estimate that we will charge approximately £12,000 for the certification of claims and returns.
- 41 As indicated in paragraphs 2 and 31, the audit planning process will continue as the year progresses and it is likely that there will be some changes to our planned work and hence to the indicative fee quoted in paragraph 39 above. Any changes to the fee will be agreed with you.

Other information

The audit and inspection team

- 42 The key members of the audit and inspection team for the 2007/08 audit are shown in the table below.

Table 2

Name	Contact details	Responsibilities
Gary Stevens Relationship Manager	G-stevens@audit-commission.gov.uk 0844 798 3954	The primary point of contact with the authority and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Liz Cave District Auditor	l-cave@ audit-commission .gov.uk 07818 015965	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive and [audit] committee.
David Evans Audit Manager	d-evans@audit-commission.gov.uk 07980 013390	Manages and co-ordinates the different elements of the audit work. Key point of contact for the Director of Finance.

Independence and objectivity

- 43 We are not aware of any relationships that may affect the independence and objectivity of the District Auditor and the audit staff, which we are required by auditing and ethical standards to communicate to you.
- 44 We comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised at Appendix 3.

Quality of service

- 45 We are committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact the Relationship Manager or District Auditor in the first instance. Alternatively you may wish to contact the West Midlands Head of Operations, Phil Jones.
- 46 If we are unable to satisfy your concerns, you have the right to make a formal complaint to the Audit Commission. The complaints procedure is set out in the leaflet *Something to Complain About* which is available from the Commission's website or on request.

Planned outputs

- 47 Our reports will be discussed and agreed with the appropriate officers before being issued to the [audit] committee.

Table 3

Planned output	Indicative date
Opinion audit plan	November 2007
Data quality report	TBC
Interim audit memorandum	June 2008
Annual governance report	September 2008
Opinion on the financial statements and value for money conclusion	September 2008
Final accounts memorandum (to the Director of Finance)	October 2007
Use of resources report	December 2008
Housing re-inspection	May 2008
Annual audit and inspection letter	TBC
BVPP report	December 2008

Appendix 1 – Initial risk assessment – use of resources

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor’s responsibilities
<p>Voluntary engagement. Risk of continuing in engagement.</p>	Development and monitoring of the council improvement plan.	Yes	We will review progress against the improvement plan.	Use of resources value for money assessment.
<p>Town centre redevelopment. Risk that project is not cost effective or in line stakeholder expectations.</p>	This is a priority (CP1) within the overall improvement plan	Yes	<p>We will review progress/costs against action plans.</p> <p>We will monitor the risks facing the project and discuss any further involvement as required.</p>	Use of resources and VfM conclusion.
<p>Financial pressures. Significant future savings are required. Risk of not achieving balanced budget and efficiency targets without reducing services.</p>	This is included (as priorities FP1/FP2) within the overall improvement plan.	Yes	We will monitor budgetary control procedures and results during the year.	Use of resources financial management and financial standing assessments.

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor’s responsibilities
Longbridge redevelopment.	This is a priority (CP2) within the overall improvement plan.	Yes	We will review progress against the improvement plan. We will monitor the risks facing the project and discuss any further involvement as required.	Use of resources and VfM conclusion
Spatial project. Risk that project does not deliver expecting service improvements or cost savings.	This is a priority (PR3) within the overall improvement plan.	Yes	We will review progress against the improvement plan We will monitor the risks facing the project and discuss any further involvement as required.	Use of resources and VfM conclusion
Job evaluation Risk of unplanned, high cost increases in costs. Danger of poor staff morale from the project.		Yes	We will review the progress/costs of the JE exercise.	Use of resources financial management and VFM.

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor’s responsibilities
<p>Benchmarking. UoR feedback suggests the council needs to tackle areas of high cost and low performance service areas.</p>	<p>This is a priority (FP1) within the overall improvement plan. Audit Commission data will be used for comparison purposes.</p>	<p>Yes</p>	<p>We will liaise with the council to facilitate the use of Audit Commission data.</p>	<p>Use of resources VFM assessment</p>
<p>Leisure centre. Possible transfer of management to independent management company. Risk that cost savings are not realised or service quality is not maintained/improved.</p>		<p>Yes</p>	<p>We will review the council's procedures for assessing VFM and governance arrangements.</p>	<p>Use of resources VFM and internal control.</p>

Appendix 2 – Audit and inspection fee

- 1 Table 4 provides details of the planned audit and inspection fee for 2007/08 with a comparison to the [planned/actual] fee for 2006/07.

Table 4

Audit area	Planned fee 2007/08 £	Actual fee 2006/07 £
Audit		
Financial statements	61950	48,000
Use of resources (including BVPP)	21200	42,000
Data quality	6700	-
Whole of government accounts	1800	-
National Fraud Initiative	600	-
Total audit fee	92,250	90,000
Inspection		
Relationship management	2,950	2,870
Direction of Travel	2,950	
Service inspection	7,200	5,957
Recovery Support	5,900	8,624
Corporate inspection		5,500
Total inspection fee	19,000	22,951
Total audit and inspection fee	111,250	112,951
Certification of claims and returns (estimated)	12,100	12,000

- 2 The Audit Commission scale fee for Bromsgrove Council is £86,370. The fee proposed for 2007/08 is +7 per cent compared to the scale fee and is within the normal level of variation specified by the Commission.

- 3 The Audit Commission has the power to determine the fee above or below the scale fee where it considers that substantially more or less work is required than envisaged by the scale fee. The Audit Commission may, therefore, adjust the scale fee to reflect the actual work that needs to be carried out to meet the auditor's statutory responsibilities, on the basis of the auditor's assessment of risk and complexity at a particular body.
- 4 It is a matter for the auditor to determine the work necessary to complete the audit and, subject to approval by the Audit Commission, to seek to agree an appropriate variation to the scale fee with the Council. The Audit Commission expects normally to vary the scale fee by no more than 30 per cent (upwards or downwards). This fee then becomes payable.

The fee (plus VAT) will be charged in 12 equal instalments from April 2007 to March 2008.

Specific audit risk factors

- 5 In setting the audit fee we have taken into account the specific risk factors set out in Appendix 1.

Assumptions

- 6 In setting the fee, we have assumed that:
 - the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2006/07 you will inform us of significant developments impacting on our audit;
 - internal audit meets the appropriate professional standards;
 - internal audit undertakes appropriate work on all systems that provide material figures in the financial statements sufficient that we can place reliance for the purposes of our audit;
 - good quality working papers and records will be provided to support the financial statements by [date];
 - requested information will be provided within agreed timescales;
 - prompt responses will be provided to draft reports; and
 - additional work will not be required to address questions or objections raised by local government electors.
- 7 Where these assumptions are not met, we will be required to undertake additional work which is likely to result in an increased audit fee. The fee for the audit of the financial statements will be re-visited when we issue the opinion audit plan.

- 8 Changes to the plan will be agreed with you. These may be required if:
- new residual audit risks emerge;
 - additional work is required of us by the Audit Commission or other regulators; and
 - additional work is required as a result of changes in legislation, professional standards or as a result of changes in financial reporting.

Specific actions Bromsgrove District Council could take to reduce its audit and inspection fees

- 9 The Audit Commission requires its auditors to inform a council of specific actions it could take to reduce its audit and inspection fees. We will develop a sound working relationship with Internal Audit so that we can place as much reliance as appropriate on their work. We will also discuss our working paper requirements with officers so that they can provide as much relevant information as possible to support the accounts.

Process for agreeing any changes in audit fees

- 10 If we need to make any significant amendments to the audit fee during the course of this plan, we will firstly discuss this with the Director of Finance. We will then prepare a report outlining the reasons why the fee needs to change for discussion with the audit.

Appendix 3 – Independence and objectivity

- 1 Auditors appointed by the Audit Commission are required to comply with the Commission's Code of Audit Practice and Standing Guidance for Auditors, which defines the terms of my appointment. When auditing the financial statements auditors are also required to comply with auditing standards and ethical standards issued by the Auditing Practices Board (APB).
- 2 The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.
- 3 International Standard on Auditing (UK and Ireland) 260 (Communication of audit matters with those charged with governance) requires that the appointed auditor:
 - discloses in writing all relationships that may bear on the auditor's objectivity and independence, the related safeguards put in place to protect against these threats and the total amount of fee that the auditor has charged the client; and
 - confirms in writing that the APB's ethical standards are complied with and that, in the auditor's professional judgement, they are independent and their objectivity is not compromised.
- 4 The standard defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case, the appropriate addressee of communications from the auditor to those charged with governance is the audit committee. The auditor reserves the right, however, to communicate directly with the authority on matters which are considered to be of sufficient importance.
- 5 The Commission's Code of Audit Practice has an overriding general requirement that appointed auditors carry out their work independently and objectively, and ensure that they do not act in any way that might give rise to, or could reasonably be perceived to give rise to, a conflict of interest. In particular, appointed auditors and their staff should avoid entering into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement.

6 The Standing Guidance for Auditors includes a number of specific rules. The key rules relevant to this audit appointment are as follows:

- appointed auditors should not perform additional work for an audited body (ie work over and above the minimum required to meet their statutory responsibilities) if it would compromise their independence or might give rise to a reasonable perception that their independence could be compromised. Where the audited body invites the auditor to carry out risk-based work in a particular area that cannot otherwise be justified as necessary to support the auditor's opinion and conclusions, it should be clearly differentiated within the audit plan as being 'additional work' and charged for separately from the normal audit fee;
- auditors should not accept engagements that involve commenting on the performance of other auditors appointed by the Commission on Commission work without first consulting the Commission;
- the District Auditor responsible for the audit should, in all but the most exceptional circumstances, be changed at least once every five years;
- the District Auditor and senior members of the audit team are prevented from taking part in political activity on behalf of a political party, or special interest group, whose activities relate directly to the functions of local government or NHS bodies in general, or to a particular local government or NHS body; and
- the District Auditor and members of the audit team must abide by the Commission's policy on gifts, hospitality and entertainment.