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Council Building
2 High Street
Perth
PH1 5PH

21/03/2022

A virtual meeting of **Audit Committee** will be held on **Monday, 28 March 2022** at **10:00**.

If you have any queries please contact Committee Services on (01738) 475000 or email Committee@pkc.gov.uk.

THOMAS GLEN
Chief Executive

Those attending the meeting are requested to ensure that all notifications are silent on their device and other devices are in silent mode.

Please note that the meeting will be broadcast online and recorded. The recording will be publicly available on the Council's website following the meeting.

Members:

Councillor Eric Drysdale (Convener)
Councillor Stewart Donaldson (Vice-Convener)
Councillor Liz Barrett
Councillor Harry Coates
Councillor David Illingworth
Councillor Roz McCall
Councillor Xander McDade

Audit Committee

Monday, 28 March 2022

AGENDA

MEMBERS ARE REMINDED OF THEIR OBLIGATION TO DECLARE ANY FINANCIAL OR NON-FINANCIAL INTEREST WHICH THEY MAY HAVE IN ANY ITEM ON THIS AGENDA IN ACCORDANCE WITH THE COUNCILLORS' CODE OF CONDUCT.

- 1 WELCOME AND APOLOGIES**
- 2 DECLARATIONS OF INTEREST**
- 3 MINUTE OF MEETING OF THE AUDIT COMMITTEE OF 7 FEBRUARY 2022 FOR APPROVAL** **5 - 6**
(copy herewith)
- 4 BRIEFING NOTE - ROADS MAINTENANCE PARTNERSHIP AGREEMENT** **7 - 8**
(copy herewith)
- 5 PERTH AND KINROSS COUNCIL AUDIT STRATEGY - YEAR ENDING 31 MARCH 2022** **9 - 48**
(copy herewith 22/64)
- 6 INTERNAL AUDIT UPDATE**
Report by Chief Internal Auditor (copy to follow)
- 7 NATIONAL FRAUD INITIATIVE 2020/21 OUTCOMES** **49 - 54**
Report by Chief Internal Auditor (copy herewith 22/65)

IT IS RECOMMENDED THAT THE PUBLIC AND PRESS SHOULD BE EXCLUDED DURING CONSIDERATION OF THE FOLLOWING ITEM(S) IN ORDER TO AVOID THE DISCLOSURE OF INFORMATION WHICH IS EXEMPT IN TERMS OF SCHEDULE 7A TO THE LOCAL GOVERNMENT (SCOTLAND) ACT 1973

- P1 INTERNAL AUDIT FOLLOW UP**
- Exempt Reason 14 - Any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

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You can also send us a text message on 07824 498145.

All Council Services can offer a telephone translation facility.

AUDIT COMMITTEE

Minute of Meeting of the Audit Committee held virtually via Microsoft Teams on Monday 7 February 2022 at 09.30am.

Present: Councillors E Drysdale, L Barrett, S Donaldson, A Forbes (substituting for Councillor H Coates), D Illingworth, R McCall and X McDade.

In Attendance: L Simpson, J Clark, K Molley, A Brown, M Pasternak, L McGuigan and B Parker (all Corporate and Democratic Services); F Crofts (Communities); and J Cockburn (Education and Children's Services).

Apology: Councillors H Coates

Councillor E Drysdale, Convener, Presiding.

1. WELCOME AND APOLOGIES/SUBSTITUTIONS

The Convener welcomed everyone to the meeting and an apology was noted above.

2. DECLARATIONS OF INTEREST

There were no declarations of interest made in terms of the Councillors' Code of Conduct.

3. MINUTE OF MEETING OF THE AUDIT COMMITTEE OF 8 DECEMBER 2021 FOR APPROVAL

The minute of meeting of the Audit Committee of 8 December 2021 was submitted and approved as a correct record.

4. INTERNAL AUDIT FOLLOW UP

There was submitted a report by the Chief Internal Auditor (21/30) presenting a current summary of Internal Audit's 'follow up' work relating to actions due for completion up to December 2021.

Councillor S Donaldson raised concerns over the timing of the 16-22 - Roads Maintenance Partnership 'Obtaining Best Value in Works' procedure which is due to be completed by March 2023. F Crofts advised that the target of 2023 had been set to ensure that current procedures are fit for purpose and deliver best value. He added that a Short Life Working Group would be created with members from the roads division, procurement, and the corporate asset management team to add further objectivity to the review. S Donaldson asked for a written update to be brought to the March 2022 committee.

Resolved:

The completion of internal audit actions due within the period September-December 2021 and the current position in respect of the agreed actions arising from internal audit work, be noted.

5. INTERNAL AUDIT UPDATE

There was submitted a report by the Chief Internal Auditor (21/28) presenting a summary of Internal Audit's work undertaken as part of the Internal Audit Plans for 2019/20 and 2020/21.

In response to a question from Councillor D Illingworth regarding staffing resources within the internal audit team, J Clark advised that there are currently three full time members of staff employed, and an additional post would shortly be advertised to recruit another full-time employee. She hoped the post would be filled by April 2022.

In response to a question from Councillor X McDade regarding the outstanding actions with the status 'planned - March 2022' and seeking assurance that actions would be completed before the Local Government elections in May 2022, J Clark seemed confident that the outstanding actions would be completed within the timeframe for existing elected members, however those actions would then be reported to an audit committee following the election.

In response to a question from Councillor S Donaldson regarding A21-06 IT Assets and the scope of the report, J Clark advised that the work would be focused on IT and information assets, and the associated risk within the Corporate Risk Register. A high-level analysis would be undertaken to review controls that are in place to manage specific risks.

Resolved:

The progress with Internal Audit activity, be noted.

5(i) COMMUNITIES

(a) 21-10 LEADER

There was submitted a report by the Chief Internal Auditor (22/29) on an audit to review regulatory compliance for the LEADER projects.

In response to a question from Councillor X McDade regarding EU structural funds, J Clark advised that throughout the early stages of the Leader project, internal audit input was beneficial in providing advice and assurance on how to improve the control environment. Over recent years she had felt that the internal audit process hadn't added much value in terms of improving processes.

F Crofts added that the increase in the number of grants being awarded, the administration of grants and the risk attached, had impacted resources significantly beyond the internal audit team. Under new structural funds, it would be helpful to have internal input and increased focus initially but if things are moving steadily, the frequency of grants and internal audit involvement could be reduced.

Resolved:

The contents of report 22/29, be noted.

Briefing Note to Audit Committee - 28 March 2022

Action Point : 7b Road Maintenance Partnership Agreement Importance: Medium Audit Committee Date: March 2017

Action

“The agreement also seeks to develop systems and procedures that ensure compliance with BS EN ISO 9001/9002.”

Background

The former Roads Transport and Architectural Services had an accredited quality assurance scheme in place which was relinquished around 2008, after having been considered a low risk to shift away from BS accreditation, due to the low complexity of road design work being undertaken. It was primarily in place as a pre-requisite of the trunk road contract which had been privatised in 2000. The accredited scheme covered all aspects of road related design, was managed by a Quality Manager and required auditing both internally and externally to retain accreditation.

It was relinquished partly due to cost and partly as we did no external design works, and the required employment qualifications of staff meant they were suitably qualified and experienced for the in-house designs being undertaken.

Completed Action

In considering the above action, an accredited system in accord with the BS was considered excessive for the level of maintenance design the Partnership undertake and instead a proportionate and fit for purpose quality assurance approach was adopted. The requirement to manage and monitor such a formal accredited system as well as the cost of accreditation was also prohibitive. This system of checks in place covers all aspects of project delivery including design, consultation and financial sign off.

To satisfy the quality management requirement all projects under the annual tender (framework) award system require to have a checklist completed and an offer/acceptance letter signed off. A process of document control was also implemented to ensure regular review of requirements was undertaken.

- Example of completed checklist and award letters.



U219 Dalqueich Patching - File check



Brahan Terrace Perth Resurfacing - File che

- Document control records



File%20Checklist%20Document%20Contro



Offer%20Letter%20Docuement%20Control.c

Stuart D'All
Road Maintenance Partnership Manager
04 March 2022



Perth and Kinross Council

Audit Strategy

Year ending 31 March 2022

For the Council consideration on 28 March 2022

Introduction

About this report

This report has been prepared in accordance with the responsibilities set out within the Audit Scotland’s Code of Audit Practice (“the Code”).

This report is intended for the benefit of Perth and Kinross Council (“the Council”) and is made available to Audit Scotland and the Controller of Audit (together “the Beneficiaries”). This report has not been designed to be of benefit to anyone except the Beneficiaries. In preparing this report we have not taken into account the interests, needs or circumstances of anyone apart from the Beneficiaries, even though we may have been aware that others might read this report and it will not be quoted or referred to, in whole or in part, without our prior written consent. We have prepared this report for the benefit of the Beneficiaries alone.

Nothing in this report constitutes an opinion on a valuation or legal advice.

We have not verified the reliability or accuracy of any information obtained in the course of our work, other than in the limited circumstances set out in the scoping and purpose section of this report.

This report is not suitable to be relied on by any party wishing to acquire rights against KPMG LLP (other than the Beneficiaries) for any purpose or in any context. Any party other than the Beneficiaries that obtains access to this report or a copy (under the Freedom of Information Act 2000, the Freedom of Information (Scotland) Act 2002, through a Beneficiary’s Publication Scheme or otherwise) and chooses to rely on this report (or any part of it) does so at its own risk. To the fullest extent permitted by law, KPMG LLP does not assume any responsibility and will not accept any liability in respect of this report to any party other than the Beneficiaries.

Complaints

If at any time you would like to discuss with us how our services can be improved or if you have a complaint about them, you are invited to contact Michael Wilkie, who is the engagement leader for our services to Perth and Kinross Council, telephone 07795370106 or email to michael.wilkie@kpmg.co.uk, who will try to resolve your complaint. If your problem is not resolved, you should contact Hugh Harvie, our Head of Audit in Scotland, either by writing to him at Saltire Court, 20 Castle Terrace, Edinburgh, EH1 2EG, by emailing hugh.harvie@kpmg.co.uk.

We will investigate any complaint promptly and do what we can to resolve the difficulties. After this, if you are still dissatisfied with how your complaint has been handled you can refer the matter to Fiona Kordiak, Audit Scotland, 4th Floor, 102 West Port, Edinburgh, EH3 9DN.

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Introduction (continued)

To the Audit Committee of Perth and Kinross Council

2021-22 is the sixth and final year of our external audit appointment to Perth and Kinross Council (“the Council”) and its group (“the Group”), having been appointed by the Accounts Commission as auditor of the Council under the Local Government (Scotland) Act 1973 (“the Act”). The period of appointment is 2016-17 to 2021-22, inclusive which was extended at the request of the Accounts Commission. Our appointment includes the audit of the Perth and Kinross Council Charitable Trusts.

This report outlines our risk assessment and planned audit approach, which is consistent with our prior year audit approach. We provide this report to you in advance of the audit committee to allow you sufficient time to consider the key matters and formulate your questions.

Our planned work in 2021-22 will include:

- an audit of the financial statements and provision of an opinion on whether the financial statements:
 - give a true and fair view in accordance with the applicable law and the Code of Practice on Local Council Accounting in the United Kingdom (“the 2021-22 Code”) of the state of the affairs of the Council as at 31 March 2022 and of the income and expenditure of the Council for the year then ended; and
 - have been prepared in accordance with International Financial Reporting Standards (“IFRS”) as adopted by the European Union, as interpreted and adapted by the 2021-22 Code, the requirements of the Local Government (Scotland) Act 1973, The Local Council Accounts (Scotland) Regulations 2014 and the Local Government in Scotland Act 2003;
- participation in the shared risk assessment as part of the local area network;
- completion of returns to Audit Scotland and grant claims;

- a review and assessment of the Council’s governance arrangements and review of the governance statement;
- a review of National Fraud Initiative arrangements;
- a review of arrangements for preparing and publishing statutory performance information; and
- contributing to the audit of wider scope and Best Value through performance of risk assessed work.

How we deliver audit quality

Audit quality is at the core of everything we do at KPMG and we believe that it is not just about reaching the right opinion, but how we reach that opinion. We consider risks to the quality of our audit in our engagement risk assessment and planning discussions.

We define ‘audit quality’ as being the outcome when audits are:

- **Executed consistently**, in line with the requirements and intent of **applicable professional standards** within a strong **system of quality controls** and
- All of our related activities are undertaken in an environment of the utmost level of **objectivity**, independence, **ethics** and **integrity**.

Adding value

Throughout the audit, we will consider opportunities to add value and will conclude on this in our annual audit report. We add value through:

- our experience, which brings insight and challenge;
- our tools and approach, which contribute to a world class audit; and
- transparency and efficiency, which improves value for money.

Introduction (continued)

Our team

The team has significant experience in the audit of local authorities, and is supported by specialists, all of whom work with a variety of local government and public sector bodies. All members of the team are part of our wider local government network. Senior members of the audit team and their relevant contact details are provided on the back page of this report. The senior team involved in the external audit benefits from continuity with Michael Wilkie continuing as the engagement leader, and Carol Batchelor being the engagement senior manager.

Our work will be completed in four phases from December 2021 to September 2022. Our key deliverables to the audit committee are this audit strategy document, an interim report (subject to findings) and an annual audit report.

Acknowledgements

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

Headlines

Materiality

Group materiality for planning purposes is based on last year's adjusted gross expenditure and is set at £10.2 million (2020-21: £10.0 million, 2%), which equates to 2% of this expenditure total. We will review gross expenditure on receipt of draft accounts for 2021-22, and assess whether we are required to update our group materiality.

In line with the Code of Audit Practice, we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance and this has been set at £0.25 million.

Page seven

Audit risks

Those risks requiring specific audit attention and procedures to address the likelihood of a material financial statement error have been identified as:

- management override of controls fraud risk (assumed risk per International Standards of Auditing ("ISA") (UK and Ireland) 240 *The auditor's responsibilities relating to fraud in an audit of financial statements*);
- fraud risk over expenditure recognition (assumed risk per ISA 240 and Practice Note 10 ("PN10"));
- retirement benefits obligations; and
- valuation of property and investment property.

The risk with less likelihood of giving rise to a material error, but which is nevertheless worthy of audit understanding, relates to capital expenditure, which is included as an other audit area. This is in respect of ensuring that the classification of costs between operating and capital expenditure is appropriate and in respect of capturing all relevant costs and contributions. We consider that any large capital project inherently brings increased risk to an entity and the wider scope of public sector audit.

Pages nine - 15



Financial statement audit

Our financial statements audit work follows a four stage audit process which is identified below. **Appendix three** provides more detail on the timeline of these activities. The outputs from our audit are detailed in **Appendix four**. This report concentrates on the audit planning stage of the financial statements audit.



Appendix eight details the responsibilities of KPMG and management in respect of the financial statements.

Wider scope and best value

Auditors are required to assess and provide conclusions in the annual audit report in respect of four wider scope dimensions:

- financial sustainability;
- financial management;
- governance and transparency; and
- value for money.

We test wider scope areas where there are identified risks. We consider that there are wider scope risks in respect of demand pressures and the transformation programme.

In June 2016, the Accounts Commission formally agreed the overall framework for the approach to auditing Best Value in councils which introduced a five year approach. 2021-22 represents year six of the Best Value plan for the Council, and we will follow up on recommendations made during the previous audit.

Pages 19 - 25

Headlines (continued)

Group audit

In addition to the Council, we deem the Perth and Kinross Integration Joint Board (“IJB”) to be significant in the context of the group audit. KPMG is the auditor of the IJB. Further details regarding our approach can be found at page 18. The group accounts do not include the Council’s share of the Tayside and Central Scotland Transport Partnership (“Tactran”) on the grounds of materiality.

Page 18 and Appendix six

Independence

In accordance with ISA 260 *Communication of audit matters with those charged with governance* and the Financial Reporting Council’s (“FRC”) Ethical Standards, we are required to communicate to you all relationships between KPMG and the Group that may be reasonably thought to have bearing on our independence both:

- at the planning stage; and
- whenever significant judgements are made about threats to objectivity and independence and the appropriateness of safeguards put in place.

Appendix two contains our confirmation of independence and any other matters relevant to our independence.

Total fees charged by us for the period ended 31 March 2021 were communicated in our Annual Audit Report issued in September 2021. Total fees for 2021-22 will be presented in our Annual Audit Report issued on completion of the audit. The proposed audit fee for 2021-22 is £295,290 (inc VAT) as explained in **Appendix five**.

Quality

International Standard on Quality Control (UK and Ireland) 1 (“ISQC1”) requires that a system of quality control is established, as part of financial audit procedures, to provide reasonable assurance that professional standards and regulatory and legal requirements are being complied with and that the independent auditor’s report or opinion is appropriate in the circumstances.

Our Audit Quality Framework and KPMG Audit Manual comply with ISQC1. Our UK Senior Partner has ultimate responsibility for quality control. Operational responsibility is delegated to our Head of Quality & Risk who sets overall risk management and quality control policies. These are cascaded through our Head of Audit in Scotland and ultimately to Michael Wilkie as the Director leading delivery of services to the Council.

The nature of our services is such that we are subject to internal and external quality reviews. KPMG UK’s annual financial statements include our UK transparency report which summarises the results of various quality results and developments over the course of each year.

We also provide Audit Scotland with details of how we comply with ISQC1 and an annual summary of our achievement of key performance indicators and quality results.

We welcome your comments or feedback related to this strategy and our service overall.

Financial statements audit planning

Materiality

We are required to plan our audit to determine with reasonable confidence whether or not the financial statements are free from material misstatement. An omission or misstatement is regarded as material if it would reasonably influence the user of financial statements. This therefore involves an assessment of the qualitative and quantitative nature of omissions and misstatements.

Generally, we would not consider differences in opinion in respect of areas of judgement to represent 'misstatements' unless the application of that judgement results in a financial amount falling outside of a range which we consider to be acceptable.

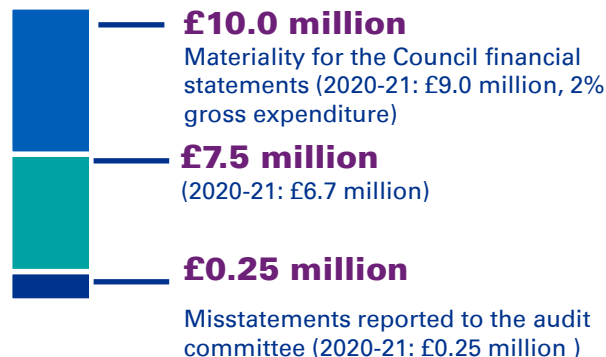
In respect of the Council's standalone accounts, materiality for planning purposes has been set at £10.0 million, and at £10.2 million for the group accounts (2020-21: £9.0 million and £10.0 million respectively), which in both cases equates to 2% percent of an adjusted 2020-21 gross expenditure. We adjusted gross expenditure for plant and property revaluations, to 'smooth' the impact of these movements by taking a five year rolling average of revaluation movements in line with the Council's five year revaluation policy. In addition, expenditure relating to the IJB is removed from our calculation, as income and expenditure is grossed up for presentational purposes within the comprehensive income and expenditure account. This calculation and process is unchanged from 2020-21.

To respond to aggregation risk from individually immaterial misstatements, we design our procedures to detect misstatements at a lower level of materiality for the group of £7.6 million, and £7.5 million for the Council (2019-20: £7.5 million and £6.7 million respectively).

Charitable funds materiality

In respect of the Charitable funds, materiality for planning purposes has been set at £51,700 (2020-21: £44,000), performance materiality set at £38,700 (2020-21: £33,000) and reporting threshold has been set at £2,500 (2020-21: £2,300).

Council Materiality



Reporting to the audit committee

Under ISA 260, we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. ISA 260 defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.

In the context of the Council and its Group, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £0.25 million.

If management has corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Audit Committee to assist it in fulfilling its governance responsibilities.

Financial statements audit planning (continued)

Control environment

The impact of the control environment on our audit is reflected in our planned audit procedures. Our planned audit procedures reflect findings raised in the previous year and management's response to those findings. We will continue to assess the impact of the COVID-19 pandemic on key controls, which may result in subsequent changes in our audit approach.

In 2020-21, we identified two recommendations. One related to heritage assets, the other relating to the Perth and Kinross Offer. We will follow-up progress in implementing these recommendations and report any new recommendations arising from our work and report our view of progress.

Timing of our audit and communications

We will maintain communication led by the engagement partner and manager throughout the audit. We set out below the form, timing and general content of our planned communications:

- Kick-off meeting with officers in February where we discuss our draft audit plan outlining our audit approach and discuss management's progress in key areas.
- Audit Committee meeting in March where we present our final audit plan.
- Status meetings with officers during July and August where we communicate progress on the audit plan, any misstatements, control deficiencies and significant issues.
- Closing meeting with officers in August where we discuss the auditor's report and any outstanding deliverables.
- Audit committee meeting in September where we communicate audit misstatements and significant control deficiencies

Appendix three details our approach across each phase of the audit.



Significant risks and Other audit areas

Our risk assessment draws upon our historic knowledge of the business, the industry and the wider economic environment in which Perth and Kinross Council operates.

We also use our regular meetings with senior officers to update our understanding and take input from component audit teams and internal audit reports.

COVID-19 is having a significant impact on the UK economy and has resulted in increased risk in a number of processes and services across the Council.

IFRS 16 is being implemented from 1 April 2022, with disclosures and preparation required in 2020-21.

Due to the unprecedented levels of uncertainty there is an increased likelihood of significant risks emerging throughout the audit cycle that are not identified (or in existence) at the time we planned our audit. Where such items are identified we will amend our audit approach accordingly and communicate this to the Audit Committee.

Significant risks

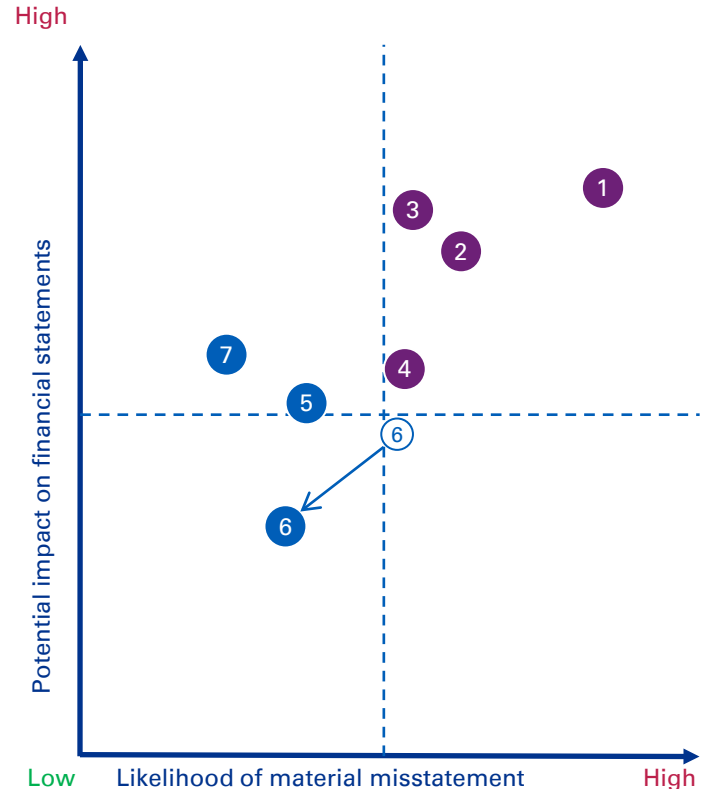
- ① Valuation of property and investment property (revaluation required by the Code)
- ② Retirement benefit obligations (assumptions and methodology)
- ③ Fraud risk from income recognition and expenditure (presumed risk per ISA 240)
- ④ Fraud risk from management override of controls (presumed risk per ISA 240)

Other audit areas

- ⑤ Capital expenditure
- ⑥ Covid-19 related grants
- ⑦ IFRS 16 transition

KEY

- Significant financial statement audit risks
- Other audit areas
- Prior year position



Significant risks and Other audit areas (continued)

Significant risks and other audit areas

Risk assessment: Our planning work takes place during December 2021 to February 2022. This involves: risk assessment; determining the materiality level; and issuing this audit plan to communicate our audit strategy. We use our knowledge of the Council, discussions with management and review of Council papers to identify areas of risk and audit focus categorised into financial risks and wider dimension risks as set out in the Code.

Significant audit risk

The risk

Fraud risk from management override of controls

Why

A presumed risk we are required to consider covers fraud risk from management override of control.

Management is typically in a position to perpetrate fraud owing to its ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. Our audit methodology incorporates the risk of management override as a default significant risk.

This is a presumed risk per ISA 240.

We outline the respective responsibilities of KPMG and management in respect of fraud at **Appendix seven**.

Planned response

- Our audit methodology incorporates the risk of management override as a default significant risk. We have not identified any specific additional risks of management override relating to the audit of the Council.
- We will consider the level of oversight of finances by management which provides additional review of potential material errors caused by management override of controls.
- In line with our methodology, we will carry out appropriate controls testing and substantive procedures, including over journal entries, accounting estimates and significant transactions that are outside the Council's normal course of business, or are otherwise unusual.

Significant risks and Other audit areas (continued)

Significant audit risk		Planned response
<p>The risk</p> <p>Fraud risk from income recognition and expenditure</p>	<p>Why</p> <p>Under ISA 240 there is a presumed risk that income may be misstated due to improper recognition of income. This requirement is modified by PN10, issued by the FRC, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.</p> <p>Income</p> <p>We consider that the Council's significant income streams, which include taxation and non-specific grant income are free of management judgement or estimation. We do not consider recognition of the remaining income sources to represent a significant risk for the Council as there are limited incentives and opportunities to manipulate the way income is recognised, and these are not likely to be materially inappropriate. We did not identify any such errors or manipulation in the prior year. We therefore rebut this risk and do not incorporate specific work into our audit plan in this area beyond our standard fraud procedures.</p> <p>Expenditure</p> <p>We consider that there is not a risk of improper recognition of expenditure in respect of payroll costs (including pension adjustments), financing and investment expenditure, or depreciation. These costs are routine in nature and not at risk of manipulation. This relates to a significant proportion of council expenditure. As other operating expenditure is unlikely to be material, we also rebut the assumed risk in respect of this account.</p> <p>We have not rebutted the assumed risk in respect of the remaining expenditure of £246 million and consider the risk arises subsequent to month 9 and in respect of cut-off.</p>	<p>In respect of material income:</p> <ul style="list-style-type: none">— non-ringfenced government grants are agreed in advance of the year, with any changes requiring government approval. There is no estimation or judgement in recognising this stream of income and we do not regard the risk of fraud to be significant. We will agree significant grants to supporting documentation.— the other major sources of income are from annual local taxes and rental income (council tax, non-domestic rates and housing incomes). These incomes are prescribed by law and other specific regulations, which prescribe the period in which annual local taxes and rental income is recognised as income. We will perform tests of detail and substantive analytical procedures in our audit of these sources of income. <p>We will include procedures to:</p> <ul style="list-style-type: none">— compare the outturn with the in year budget monitoring, considering variances;— test controls specific to confirm correct capital vs revenue allocation;— test expenditure cut-off including a search for unrecorded liabilities;— test transactions focusing on the areas of greatest risk, including debtors, creditors, accruals, prepayments and provisions to challenge completeness and existence of these balances; and— review and challenge of management in respect of estimates for evidence of bias.

Significant risks and Other audit areas (continued)

Significant audit risk	Why	Planned response
<p>The risk Valuation of property and investment property</p>	<p>Assets revalued in the year:</p> <p>The 2021-22 Code requires that where assets are subject to revaluation, their year-end carrying value should reflect the appropriate fair value at that date. In common with other councils, the Council has adopted a five year rolling revaluation model where all land and buildings are revalued. In 2020-21 new assets, industrial and business investment properties, miscellaneous non-operational properties, shops, common good investment properties, surplus properties and assets with significant capital investment will be subject to revaluation and we expect movements to be material.</p> <p>The Council uses a valuation date of 1 April 2021 for the 31 March 2022 year end, and 1 August 2021 for all investment properties. We consider there to be a risk of material movement between these dates.</p> <p>Given the quantum of the asset carrying values and the inherent use of assumptions in their valuation, we consider there to be a significant risk of misstatement.</p>	<p>Assets revalued in the year:</p> <p>A number of the Council's assets are revalued on an annual basis, including investment properties. In relation to those assets which have been revalued during the year we will assess the valuer's qualifications, objectivity and independence to carry out such valuations. We will test the accounting treatment for assets revalued to challenge whether the accounting treatment is appropriate and consider valuation inputs and assumptions using the approach below.</p> <p>We will also assess the risk of the valuation changing materially during the year, or between the date of valuation and the year end.</p> <p>Assessing methodology choice and benchmarking assumptions:</p> <p>We will review management's assessment of impairment indicators and assess for completeness.</p> <p>We will utilise our internal specialist to assess the methodology used including testing the underlying data inputs and assessing the assumptions used in comparison to available market information.</p> <p>We will select a representative sample of revalued assets to agree calculation inputs to supporting evidence, consider in detail the revaluation calculations and challenge the underlying assumptions.</p>

Significant risks and Other audit areas (continued)

Significant audit risk	Why	Planned response
<p>The risk Valuation of property and investment property (continued)</p>	<p>Assets not revalued in the year:</p> <p>The 2021-22 Code also requires consideration that the carrying amount of assets do not differ materially from the current value at the end of the reporting period. Therefore, we consider there to be a risk in relation to the assets not revalued in the year, as their current value at year end may be materially different.</p>	<p>Assets not revalued in the year:</p> <p>We will review the approach that the Council developed in the prior year, and is expected to update, to assess the risk that assets not subject to valuation are materially misstated and consider the robustness of that approach, including any indicators of impairment.</p> <p>In excess of £800 million will not be revalued in 2021-22 in line with the Council's five year revaluation cycle. The market and economic conditions at 31 March 2022 are significant different to the conditions when these properties were most recently revalued (since 1 April 2017) which may result in material changes in value.</p> <p>We will consider and challenge the assumptions and judgements made by the Council in respect of their assessment of property valuations since 1 April 2016.</p> <p>We will review and test the calculations and input data used by the Council to inform them of any indicators of impairment, or conversely property value increases that could represent a material misstatement.</p>

Significant risks and Other audit areas (continued)

Significant audit risk	Why	Planned response
<p>The risk Retirement benefit obligations</p>	<p>The net pension liability (£105.3 million as at 31 March 2021, including assets of £1 133 million and fair value of pension fund assets of £1 027.7) represents a material element of the Council's Balance Sheet. The Council is an admitted body of Tayside Pension Fund, where the fund's triennial valuation dated 31 March 2020 has been completed. The valuation of the Local Government Pension Scheme relies on a number of assumptions, most notably around the actuarial assumptions, and actuarial methodology which results in the Council's overall valuation.</p> <p>There are financial assumptions and demographic assumptions used in the calculation of the Council's valuation, such as the discount rate, inflation rates, mortality rates etc. The assumptions should also reflect the profile of the Council's employees, and should be based on appropriate data. The basis of the assumptions should be derived on a consistent basis year to year, or updated to reflect any changes.</p> <p>There is a risk that the assumptions and methodology used in the valuation of the Council's pension obligation are not reasonable. This could have a material impact to net pension liability accounted for in the financial statements.</p>	<p>Planned response Our planned audit approach includes:</p> <p>Control design: Testing the design and operating effectiveness of controls over the provision of membership information to the actuary who uses it, together with management's review of assumptions, to calculate the pension obligation.</p> <p>Benchmarking assumptions: Challenging, with the support of our own actuarial specialists, the key assumptions applied, being: the discount rate; inflation rate; and mortality/life expectancy against externally derived data.</p> <p>Challenging the rate of increase in pensionable salaries assumption, by comparing it to other evidence such as business and transformation plans and our understanding of Government and staff expectations.</p> <p>Assessing transparency: Considering the adequacy of the disclosures in respect of the sensitivity of the deficit to these assumptions.</p> <p>Assessing if the disclosures within the financial statements are in accordance with the 2021-22 Code's requirements.</p>

Significant risks and Other audit areas (continued)

Other audit area	Why	Planned response
<p>The audit area Capital expenditure</p>	<p>The Council approved a 9-year composite capital budget for 2020/21 – 2028/29 on 31 March 2021 for an estimated amount of £605.8 million. The Council’s composite capital budget includes major transport infrastructure improvements, including the Perth Transport Futures project to create a third crossing over the River Tay. Significant investment in improvements to existing infrastructure projects, road network improvements and various school refurbishments are also included in the composite capital budget.</p> <p>An additional £23.5 million funding is estimated will be required for the replacement of Perth High School, a recreation centre at Blairgowrie and a new primary school at Bertha Park.</p> <p>PH20 Leisure Vision is a proposed project to replace Perth Leisure Pool/Dewars Centre with a major new facility. The proposed capital cost is £85-£90 million. This proposal was included at the capital budget meeting on 23 February 2022.</p> <p>Due to the significance of this capital investment programme and complexity of some of the projects, we consider there to be a risk of misstatement. This is in respect of ensuring that the classification of costs between operating and capital expenditure is appropriate and in respect of capturing all relevant costs and contributions.</p> <p>We also consider that any large capital project inherently brings a fraud risk to an entity, which we consider appropriate for the Council.</p>	<p>Our audit approach includes:</p> <p>Control design:</p> <ul style="list-style-type: none">– Testing the design and operating effectiveness of controls in respect of the review of costs allocated to capital and income projects. <p>Control re-performance:</p> <ul style="list-style-type: none">– Comparing the total capital expenditure reported in the financial statements with that reported in reports to those charged with governance. <p>Tests of detail:</p> <ul style="list-style-type: none">– Use of substantive sampling methods to evaluate the appropriateness of capital or income accounting classification by reference to supporting documentation.– Assessing a sample of items allocated to income or expenditure to determine whether they are correctly classified.

Significant risks and Other audit areas (continued)

Other audit area	Why	Planned response
<p data-bbox="170 391 446 454">The audit area Covid-19 related grants</p>	<p data-bbox="517 354 1070 576">Why As part of the ongoing economic support provided by the Scottish government, the Council has provided ongoing support by operating various grant type schemes for industries and people within the Council region. The Council received in 2020-21 £60.7 million in Grants where they were acting as Agent on top of any funding they received for themselves.</p> <p data-bbox="517 596 1070 733">CIPFA/LASAAC issued guidance in May 2021 on Accounting for Coronavirus Grants / Funding streams. A further addendum to this guidance has been issued on Protective Personal Protection (PPE) stocks.</p> <p data-bbox="517 753 1070 925">This guidance provided detailed guidance as to how to account for the specific grants, with the Council acting as either the 'agent' or 'principal' with associated income and expenditure to third parties either primarily excluded or included in the Council's balances respectively.</p> <p data-bbox="517 945 1070 1082">In addition, due to the complexity, development of guidance and relative inexperience of administering the schemes, there is an element of risk of fraud and error in respect of payments made and disclosure.</p>	<p data-bbox="1114 354 1756 405">Planned response Our audit approach, dependant on any guidance issued, may include:</p> <p data-bbox="1114 425 1456 454">Inquiry and understanding:</p> <ul data-bbox="1114 474 1769 725" style="list-style-type: none">– Inquiring of Officers how the various grants are processed and controlled through the responsible departments.– Requesting management to provide a summary of schemes, their nature, volume and value of payments.– Understanding the controls in place to mitigate the risk of fraudulent claims against the support grants and schemes. <p data-bbox="1114 745 1309 773">Control design:</p> <ul data-bbox="1114 793 1731 873" style="list-style-type: none">– Testing the design and operating effectiveness of controls in awarding grants and reliefs, where they exist. <p data-bbox="1114 893 1302 922">Tests of detail:</p> <ul data-bbox="1114 942 1756 1222" style="list-style-type: none">– Challenging the judgement of whether to account for various schemes with the Council as 'agent' or 'principal'.– Assessing a sample of items awarded to determine whether grants or reliefs have been appropriately awarded and recorded in line with guidance issued.– Assessing whether any accruals, provisions or prepayments have been appropriately made in respect of guidance and the 2021-22 Code.

Other matters

Accounting framework update

The Code of Practice on Local Authority Accounting in the United Kingdom is revised each year, incorporating selected changes to the underlying IFRSs, and key accounting changes include:

From 2022-23, IFRS 16 Leases will supersede IAS 17 Leases. IFRS 16 introduces a single lessee accounting model. The Council will be more likely to account for operating leases in a similar way to the current IAS 17 treatment for finance leases. A significant volume of leases which are currently accounted for as operating leases will become financial leases and will be recognised within the Council's Balance Sheet.

These changes are significant, and where the 2021-22 balances will form the comparatives in future accounts, we will consider the Council's arrangements for complying with the forthcoming changes.

Controls testing

In respect of the financial statements, we identify the constituent account balances and significant classes of transactions and focus our work on identified risks. Determining the most effective balance of internal controls and substantive audit testing enables us to ensure the audit process runs smoothly and with the minimum disruption to the Council's finance team.

During the 2021-22 audit we will follow-up on management's progress in implementing the agreed recommendations. We will also report any new findings arising from our work in 2021-22.

Other matters (continued)

Internal audit

ISA 610 *Considering the work of internal audit* requires us to:

- consider the activities of internal audit and any impact on our audit;
- obtain an understanding of internal audit activities to assist in planning the audit and developing an effective audit approach;
- perform a preliminary assessment of the internal audit function when it appears that internal audit is relevant to our audit of the financial statements in specific audit areas; and
- evaluate and test the work of internal audit, where use is made of that work, in order to confirm its adequacy for our purposes.

We will continue liaising with internal audit and update our understanding of its approach and conclusions where relevant. The general programme of work will be reviewed for significant issues to support our work in assessing the statement of internal control.

Group audit considerations

Appendix six sets out our understanding of the Group structure and nature of each associated entity.

Perth and Kinross Council, Tactran and the IJB are audited by the same audit team within KPMG. Both the Council and the IJB are consolidated into the group accounts. Tactran is not consolidated on the grounds of materiality.

Perth and Kinross Council Charitable Funds are also audited by KPMG. Michael Wilkie will continue as engagement leader in their respect. We do not intend to issue group instructions in respect of the Charitable Funds.

We reviewed the remaining components within the group structure, and did not deem any other component significant. We therefore do not intend to issue group audit instructions to any component.

We also consider that the Council is responsible for approximately 95% of the group's activities, for which we are responsible for providing an opinion.

Wider scope and Best Value

Approach

We are required to assess and provide conclusions in the Annual Audit Report in respect of four wider scope dimensions: financial sustainability; financial management; governance and transparency; and value for money. We set out below an overview of our approach to wider scope and Best Value requirements of our annual audit. We provide on pages 20 - 24 our risk assessment in respect of these areas. We will provide narrative on these and other areas in the Annual Audit Report where relevant.

Risk assessment

We consider the relevance and significance of the potential business risks faced by local authorities, and other risks that apply specifically to the Council. These are the significant operational and financial risks in achieving statutory functions and objectives, which are relevant to auditors' responsibilities under the *Code of Audit Practice*.

In doing so we consider:

- The Council's own assessment of the risks it faces, and its arrangements to manage and address its risks.
- Evidence gained from previous audit work, including the response to that work.
- The work of other inspectorates and review agencies, through the Local Area Network ("LAN") which is established for each council.
- Discussion with Audit Scotland and the LAN over the scope of the BVAR on Perth and Kinross Council.

There is no requirements to have a LAN meeting in 2021-22 due to the pandemic, however we are sighted on the proposed work of other inspectorates and review agencies from the Audit Scotland improvement scrutiny page.

Linkages with other audit work

There is a degree of overlap between the work we do as part of the wider scope and Best Value audit and our financial statements audit. For example, our financial statements audit includes an assessment and testing of the Council's organisational control environment, many aspects of which are relevant to our wider scope and Best Value audit responsibilities.

We have always sought to avoid duplication of audit effort by integrating our financial statements and wider scope and Best Value work, and this will continue. We consider information gathered through the shared risk assessment and the Audit Commission's five strategic priorities when planning and conducting our work.

Wider scope and Best Value (continued)

Approach (continued)

Identification of significant risks

The Code identifies a matter as significant 'if, in the auditor's professional view, it is reasonable to conclude that the matter would be of interest to the audited body or the wider public. Significance has both qualitative and quantitative aspects.'

If we identify significant wider scope and Best Value risks, we will highlight the risk to the Council and consider the most appropriate audit response in each case, including:

Considering the results of work by the Council, inspectorates and other review agencies.

Carrying out local risk-based work to form a view on the adequacy of the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources.

Concluding on wider scope and Best Value

At the conclusion of the wider scope and Best Value audit we will consider the results of the work undertaken and assess the assurance obtained against each of the wider scope audit dimensions and Best Value, regarding the adequacy of the Council's arrangements for securing economy, efficiency and effectiveness in the use of resources.

If any issues are identified that may be significant to this assessment, and in particular if there are issues that indicate we may need to consider qualifying our wider scope and Best Value conclusion, we will discuss these with management as soon as possible. Such issues will also be considered more widely as part of KPMG's quality control processes, to help ensure the consistency of auditors' decisions.

Reporting

We have completed our initial wider scope and Best Value risk assessment and have not identified any significant risks. We will update our assessment throughout the year and should any issues present themselves we will report them in our Annual Audit Report.

We will report on the results of the wider scope and Best Value audit through our Annual Audit Report. This will summarise any specific matters arising, and the basis for our overall conclusion.

Wider scope and Best Value (continued)

Risk assessment

Wider scope area	Why	Audit approach
Financial sustainability	<p>Financial sustainability looks forward to the medium and longer term to consider whether the Council is planning effectively to continue to deliver its services or the way in which they should be delivered.</p> <p>Specific identified audit area:</p> <p>Demand pressures</p> <p>The Council faces growing demand pressures, both from the increasing elderly population and increasing number of young people living in Perth and Kinross. Each subset brings unique challenges to services, for healthcare, social care and education. These demand pressures are further increased by the Covid-19 pandemic.</p> <p>This comes at a time when there are recruitment challenges and adds pressure to ongoing workforce planning.</p> <p>Financing investment</p> <p>The Council has approved significant additional capital expenditure which will require to be financed over time. This will have a material impact on the revenue and capital budgets.</p>	<ul style="list-style-type: none">– We will consider the Council’s long term financial plans and its ability to adapt to the changing landscape in local government funding. This will involve consideration of the 2021-22 budget and longer term financial plans from 2022-23 and beyond.– We will monitor the Council’s key performance indicators and performance reporting, to identify any movements requiring further investigation. We will consider any overspends against budget where demand has caused a significant strain on funding, as well as underspends against budget due to staff slippages where roles have been hard to fill.– We will inquire with officers surrounding their reporting to members surrounding the assumptions and judgements made in forecasting future funding and expenditure pressures. We will detail the processes and reporting processes in place given the Covid-19 social restrictions in order to conclude whether members are provided with sufficient information.– We will consider how major capital projects are planned to be funded, including the revenue and capital consequences.

Wider scope and Best Value (continued)

Risk assessment (continued)

Wider scope area		
Financial management	<p>Why</p> <p>Financial management is concerned with financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively.</p> <p>Specific identified audit area:</p> <p>Medium and long term planning</p> <p>The Council approved the Medium Term Financial Plan (MTFP) on 15 November 2021. It was noted that it would be for the incoming administration (post May 2022 elections) to determine the future strategic priorities of the Council. The update of the MTFP considered future funding levels, increasing costs and rising demand over the short to medium term, insofar as they may impact on Perth & Kinross Council. In addition, the Council faces uncertainty around Covid-19, supporting vulnerable people, economic well-being and climate change.</p> <p>The 2022/23 budget was presented on 23 February 2022 with total net expenditure of £414.757 million and non recurring headroom of £3.238 million.</p> <p>The 2022/23 Scottish Government provisional funding allocation of £294.753 million represents a £13.482 million increase in absolute cash terms from the allocation for 2021/22.</p>	<p>Audit approach</p> <ul style="list-style-type: none">– We will consider how the Council’s transformation programme is progressing and any potential impact on financial and service planning.– We will review the financial results to 31 March 2022 compared to budget to consider if there are indications that savings are not being delivered as planned.– We will consider the Council’s approach to setting a balanced budget for 2022-23 and considering implications and delivery of the budget in our Annual Audit Report.

Wider scope and Best Value (continued)

Risk assessment (continued)

Wider scope area	Why	Audit approach
Financial management (continued)	<p>Transformation programme</p> <p>The Council has faced significant pressures in recent years. In order to address this, the Council has approved a range of measures totalling £19.4 million over 5 years across all Services.</p> <p>The Council plans to introduce an organisational wide programme of transformation and change to support delivery of the Perth and Kinross Offer and help address the significant financial, economic, social, and environmental challenges faced by the organisation and the changing needs and demands of local communities.</p> <p>The programme will include 4 key categories:</p> <ul style="list-style-type: none">• Transformation – a marked change in the form, nature, and appearance of the services delivered.• Service Improvements – a programme of service improvements and improved ways of working to deliver better outcomes for communities, improved efficiency, and productivity.• Re-structure and consolidation – the way services and teams are configured to deliver outcomes and service priorities• Budget Cuts – budget and service reductions to work within the financial constraints facing the Council, whilst focusing on agreed priority areas.	<p>– We will consider how the Council reports its funding arrangements, responsibilities and performance through the audit of its management commentary and financial statements.</p>

Wider scope and Best Value (continued)

Risk assessment (continued)

Wider scope area	Why	Audit approach
Governance and transparency	<p>Governance and transparency is concerned with the effectiveness of scrutiny and governance arrangements, leadership and decision making, and transparent reporting of financial and performance information.</p>	<ul style="list-style-type: none">– We will consider the effectiveness of scrutiny and governance arrangements, by evaluating the challenge and transparency of the reporting of financial and performance information.– We will continue to report on how the Council supports and maintains decision making, and conclude on its effectiveness.– We will consider how officers present impact on equalities through equality impact assessments when members debate motions and actions.– This will include, but is not limited to reporting on how the Council is committed to equal opportunities through internal activities (such as training, procurement and policy development), demonstration of diversity in the workforce, review of equal pay and policy development to eliminate potential areas of discrimination.– We will also consider how the council reports on its equality and fairness responsibilities to the public and its communities.

Wider scope and Best Value (continued)

Risk assessment (continued)

Wider scope area	Why	Audit approach
Value for money	<p>Value for money is concerned with how effectively resources are used to provide services.</p>	<ul style="list-style-type: none">– We will specifically consider statutory performance indicators, performance reporting and arrangements to provide for continuous improvement in respect of the Performance and outcomes audit programme.– In the context of the Council’s capital plan and procurement procedures, we will consider arrangements to provide value for money, including ongoing development of the Council’s gateway review and planned major capital developments.

Appendices

Appendix one

Mandated communications with the Audit Committee

Matters to be communicated	Link to Audit Committee papers
Independence and our quality procedures ISA 260.	Appendix two
The general approach and overall scope of the audit, including levels of materiality, fraud and engagement letter ISA 260.	Main body of this paper.
Disagreement with management about matters that, individually or in aggregate, could be significant to the entity's financial statements or the auditor's report, and their resolution (AU 380).	In the event of such matters of significance we would expect to communicate with the Audit Committee throughout the year.
Significant difficulties we encountered during the audit.	Formal reporting will be included in our ISA 260 report for the Audit Committee meeting, which focuses on the financial statements.
Significant matters discussed, or subject to correspondence, with management (ISA 260).	
Our views about the qualitative aspects of the entity's accounting and financial reporting. The potential effect on the financial statements of any material risks and exposures, such as pending litigation, that are required to be disclosed in the financial statements (ISA 260 and ISA 540).	
Audit adjustments, whether or not recorded by the entity, that have, or could have, a material effect on its financial statements. We will request you to correct uncorrected misstatements (including disclosure misstatements) (ISA 450).	
The selection of, or changes in, significant accounting policies and practices that have, or could have, a material effect on the entity's financial statements (ISA 570).	
Material uncertainties related to events and conditions that may cast significant doubt on the entity's ability to continue as a going concern (ISA 570).	
Expected modifications to the auditor's report (ISA 705).	
Related party transactions that are not appropriately disclosed (ISA 550).	

Appendix two

Confirmation of independence

Assessment of our objectivity and independence as auditor of the Perth and Kinross Council (“the Council”)

Professional ethical standards require us to provide to you at the conclusion of the audit a written disclosure of relationships (including the provision of non-audit services) that bear on KPMG LLP’s objectivity and independence, the threats to KPMG LLP’s independence that these create, any safeguards that have been put in place and why they address such threats, together with any other information necessary to enable KPMG LLP’s objectivity and independence to be assessed. This letter is intended to comply with this requirement and facilitate a subsequent discussion with you on audit independence and addresses:

- General procedures to safeguard independence and objectivity;
- Independence and objectivity considerations relating to the provision of non-audit services; and
- Independence and objectivity considerations relating to other matters.

General procedures to safeguard independence and objectivity

KPMG LLP is committed to being and being seen to be independent. As part of our ethics and independence policies, all KPMG LLP partners and staff annually confirm their compliance with our ethics and independence policies and procedures including in particular that they have no prohibited shareholdings.

Our ethics and independence policies and procedures are fully consistent with the requirements of the APB Ethical Standards. As a result we have underlying safeguards in place to maintain independence through:

- Instilling professional values
- Communications
- Internal accountability

- Internal accountability
- Risk management
- Independent reviews

We are satisfied that our general procedures support our independence and objectivity.

Independence and objectivity considerations relating to the provision of non-audit services

We have considered the fees charged by us to the council and its affiliates for professional services provided by us during the reporting period.

Independence and objectivity considerations relating to other matters

There are no other matters that, in our professional judgment, bear on our independence which need to be disclosed to the Audit Committee.

Confirmation of audit independence

We confirm that as of the date of this letter, in our professional judgment, KPMG LLP is independent within the meaning of regulatory and professional requirements and the objectivity of the partner and audit staff is not impaired.

This report is intended solely for the information of the Audit Committee and should not be used for any other purposes.

We would be very happy to discuss the matters identified above (or any other matters relating to our objectivity and independence) should you wish to do so.

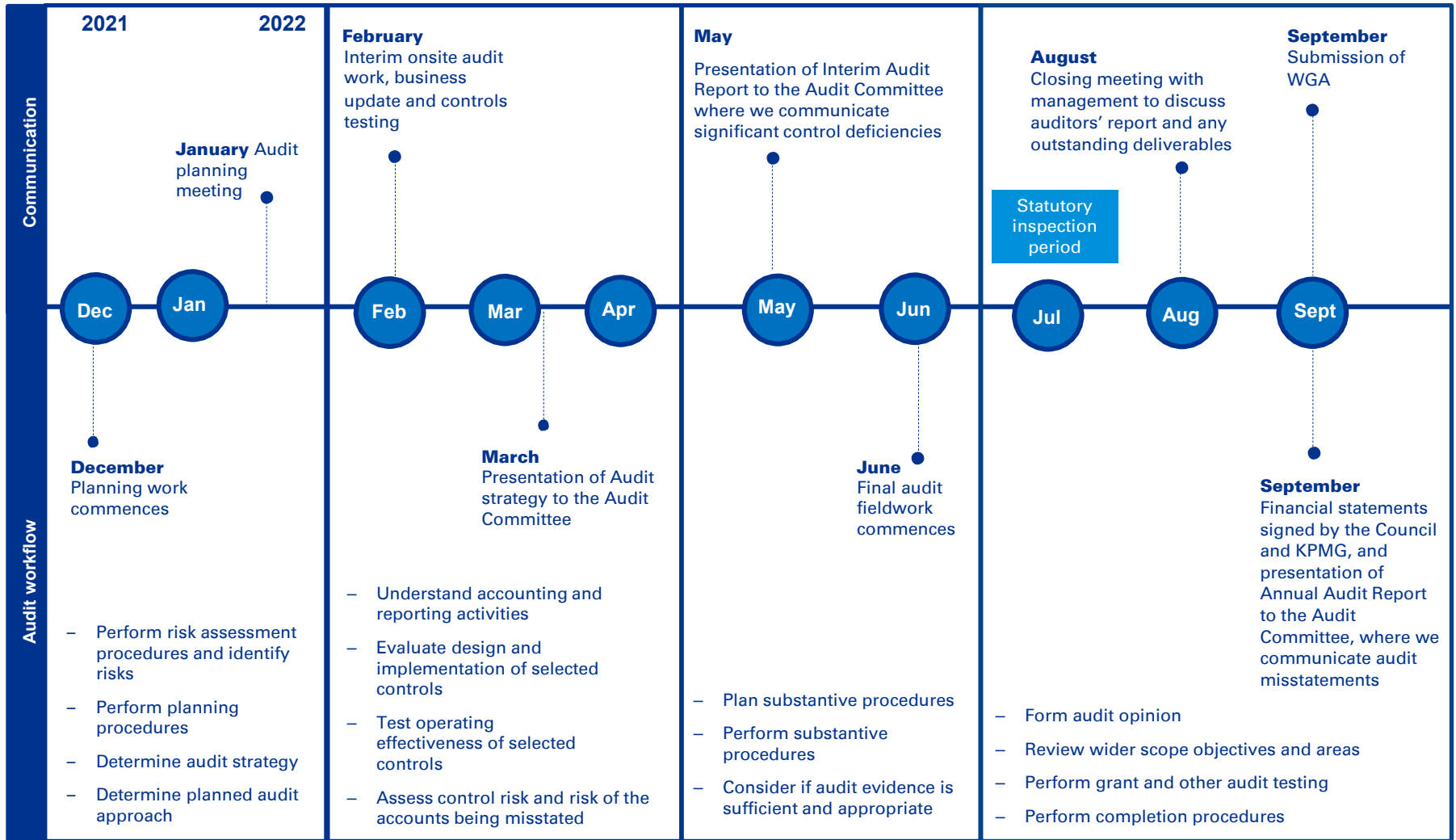
Yours faithfully

KPMG LLP



Appendix three

Timeline



Appendix four

Audit outputs

Output	Description	Report date
Audit strategy	Our strategy for the external audit of the Council and its group, including significant risk and other audit areas.	By 31 March 2022
Interim audit report	We summarise our findings from our interim audit work.	By 31 May 2022
Independent auditor's report	Our opinion on the Council's financial statements.	By 30 September 2022
Annual audit report	We summarise our findings from our work during the year.	By 30 September 2022
NFI report	We report on the Council's actions to investigate and follow-up NFI matches.	By 28 February 2022
Whole of Government Accounts	We report on the pack prepared for consolidation and preparation of the Whole of Government Accounts.	By 30 September 2022
Audit reports on other returns	We will report on the following returns: <ul style="list-style-type: none"> – Current issues return. – Technical database. – Fraud returns. 	January, March, July and October 2022 May and August 2022 December 2021, February, May, and August 2022
Grant claim audits	We provide an opinion on: <ul style="list-style-type: none"> – Education maintenance allowance, housing benefit, and non-domestic rates. 	To submit by: July 2022, November 2022, and August 2022

Appendix five

Fees

Audit Scotland has completed a review of funding and fee setting arrangements for 2021-22. An expected fee is calculated by Audit Scotland to each entity within its remit. This expected fee is made up of four elements:

- Auditor remuneration
- Pooled costs
- Contribution to Audit Scotland’s Performance Audit and Best Value (“PABV”) team
- Contribution to Audit Scotland costs

The expected fee for each body assumes that it has sound governance arrangements in place and operating effectively throughout the year, prepares comprehensive and accurate draft accounts and meets the agreed timetable for the audit.

We are in discussions with management regarding the auditor remuneration for 2021-22. Should we be required to undertake significant additional audit work in respect of any of the areas of audit focus or other matters arise including any requirement to consider accounting for, or auditing grants, we will discuss with management the impact of this on our proposed fee.

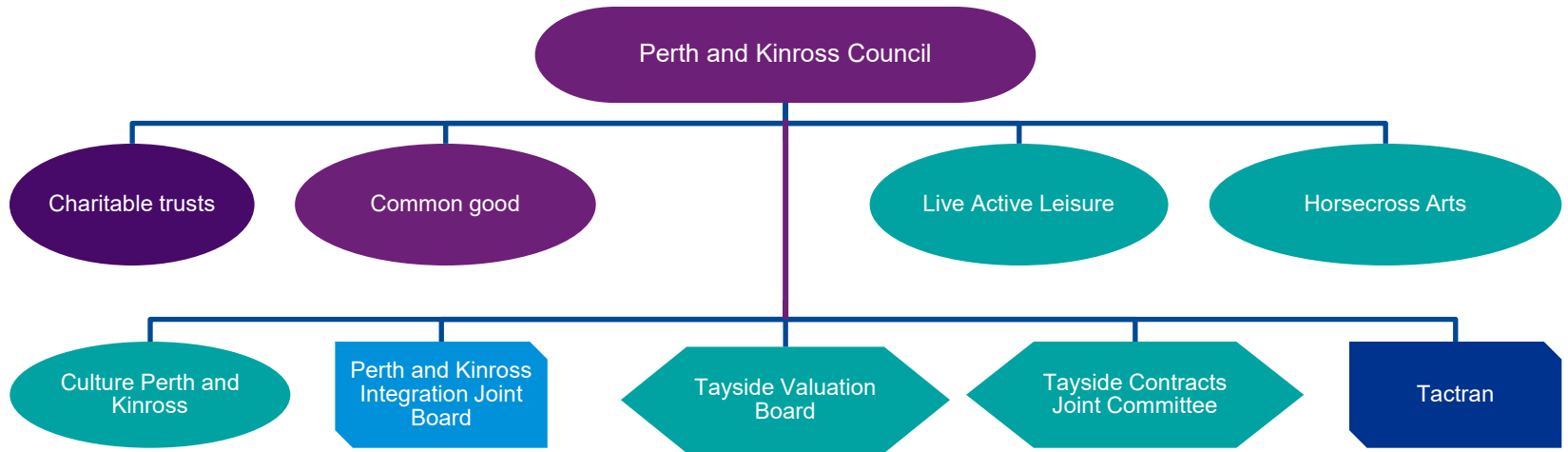
The charities fee is discussed and agreed separately from the Council fee, and will be discussed with the Trustees in due course.

	2021-22 £ (incl VAT)
Auditor remuneration	178,310
Pooled costs	18,170
Contribution to PABV	89,510
Contribution to Audit Scotland costs	9,300
Total Council audit fee	295,290

Appendix six

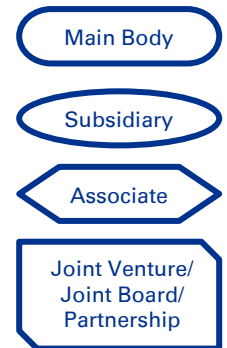
Group financial statements

The below diagram sets out our scoping of group entities in relation to the group financial statements, and related group audit instructions:



Key

- Audited by KPMG “core team”
- Audited by KPMG – separate audit team
- Audited by KPMG – separate audit team, not consolidated on the grounds of materiality
- Audited by component auditor – group audit instructions to be issued where considered significant components



Appendix seven

Responsibility in relation to fraud

We are required to consider fraud and the impact that this has on our audit approach. We will update our risk assessment throughout the audit process and adapt our approach accordingly.

Management responsibilities	KPMG's identification of fraud risk factors	KPMG's response to identified fraud risk factors	KPMG's response to identified fraud risk factors
<ul style="list-style-type: none">– Adopt sound accounting policies, with oversight from those charged with governance, establish and maintain internal control, including controls to prevent, deter and detect fraud;– Establish proper tone, culture and ethics;– Require periodic confirmation by employees of their responsibilities;– Take appropriate action in response to actual, suspected or alleged fraud;– Disclosure to audit committee and auditors;– Any significant deficiencies in internal control; and– Any fraud involving those with a significant role in internal controls.	<ul style="list-style-type: none">– Review of accounting policies;– Results of analytical procedures;– Procedures to identify fraud risk factors;– Discussion amongst engagement personnel;– Enquiries of management, to audit committee and others; and– Evaluate broad programmes and controls that prevent, deter, and detect fraud.	<ul style="list-style-type: none">– Accounting policy assessment;– Evaluate design of mitigating controls;– Test effectiveness of controls;– Address management override of controls;– Perform substantive audit procedures;– Evaluate all audit evidence; and– Communicate to the audit committee and management.	<ul style="list-style-type: none">– Whilst we consider the risk of fraud at the financial statement level to be low for the Council, we will monitor the following areas throughout the year and adapt our audit approach accordingly:<ul style="list-style-type: none">– Income recognition;– Cash;– Procurement;– Management control override; and– Assessment of the impact of identified fraud.

Audit Scotland code of audit practice – responsibility of auditors and management

Responsibilities of management

Financial Statements

Audited bodies must prepare an annual report and accounts containing financial statements and other related reports. They have responsibility for:

- preparing financial statements which give a true and fair view of their financial position and their expenditure and income, in accordance with the applicable financial reporting framework and relevant legislation;
- maintaining accounting records and working papers that have been prepared to an acceptable professional standard and that support their financial statements and related reports disclosures;
- ensuring the regularity of transactions, by putting in place systems of internal control to ensure that they are in accordance with the appropriate Council;
- maintaining proper accounting records; and
- preparing and publishing, along with their financial statements, an annual governance statement, management commentary (or equivalent) and a remuneration report that are consistent with the disclosures made in the financial statements. Management commentary should be fair, balanced and understandable and also clearly address the longer- term financial sustainability of the body.

Further, it is the responsibility of management of an audited body, with the oversight of those charged with governance, to communicate relevant information to users about the entity and its financial performance, including providing adequate disclosures in accordance with the applicable financial reporting framework. The relevant information should be communicated clearly and concisely.

Audited bodies are responsible for developing and implementing effective systems of internal control as well as financial, operational and compliance controls. These systems should support the achievement of their objectives and safeguard and secure value for money from the public funds at their disposal. They are also responsible for establishing effective and appropriate internal audit and risk-management functions.

Audited bodies are responsible for providing the auditor with access to all information relevant to the preparation of the financial statements, additional information requested and unrestricted access to persons within the entity.

Appendix eight

Audit Scotland code of audit practice – responsibility of auditors and management (continued)

Responsibilities of management
Prevention and detection of fraud and irregularities
Audited bodies are responsible for establishing arrangements for the prevention and detection of fraud, error and irregularities, bribery and corruption and also to ensure that their affairs are managed in accordance with proper standards of conduct by putting proper arrangements in place.
Corporate governance arrangements
Each body, through its chief executive or accountable officer, is responsible for establishing arrangements to ensure the proper conduct of its affairs including the legality of activities and transactions, and for monitoring the adequacy and effectiveness of these arrangements. Audited bodies should involve those charged with governance (including Audit Committees or equivalent) in monitoring these arrangements.
Financial position
Audited bodies are responsible for putting in place proper arrangements to ensure that their financial position is soundly based having regard to: <ul style="list-style-type: none">– such financial monitoring and reporting arrangements as may be specified;– compliance with any statutory financial requirements and achievement of financial targets;– balances and reserves, including strategies about levels and their future use;– how they plan to deal with uncertainty in the medium and longer term; and– the impact of planned future policies and foreseeable developments on their financial position.
Best Value, use of resources and performance
The Scottish Public Finance Manual sets out that accountable officers appointed by the Principal Accountable Officer for the Scottish Administration have a specific responsibility to ensure that arrangements have been made to secure best value.

Audit Scotland code of audit practice – responsibility of auditors and management (continued)

Responsibilities of auditors

Appointed auditor responsibilities

Auditor responsibilities are derived from statute, this Code, ISAs, professional requirements and best practice and cover their responsibilities when auditing financial statements and when discharging their wider scope responsibilities. These are to:

- undertake statutory duties, and comply with professional engagement and ethical standards;
- provide an opinion on audited bodies’ financial statements and, where appropriate, the regularity of transactions;
- review and report on, as appropriate, other information such as annual governance statements, management commentaries, remuneration reports, grant claims and whole of government returns;
- notify the Auditor General when circumstances indicate that a statutory report may be required;
- participate in arrangements to cooperate and coordinate with other scrutiny bodies (local government sector only);
- demonstrate compliance with the wider public audit scope by reviewing and providing judgements and conclusions on the audited bodies:
 - effectiveness of performance management arrangements in driving economy, efficiency and effectiveness in the use of public money and assets;
 - suitability and effectiveness of corporate governance arrangements; and
 - financial position and arrangements for securing financial sustainability.

Weaknesses or risks identified by auditors are only those which have come to their attention during their normal audit work in accordance with the Code, and may not be all that exist. Communication by auditors of matters arising from the audit of the financial statements or of risks or weaknesses does not absolve management from its responsibility to address the issues raised and to maintain an adequate system of control.

This report communicates how we plan to identify, assess and obtain sufficient appropriate evidence regarding the risks of material misstatement of the financial statements due to fraud and to implement appropriate responses to fraud or suspected fraud identified during the audit.

Appendix eight

Audit Scotland code of audit practice – responsibility of auditors and management (continued)

Responsibilities of auditors
General principles
This Code is designed such that adherence to it will result in an audit that exhibits these principles.
Independent
<p>When undertaking audit work all auditors should be, and should be seen to be, independent. This means auditors should be objective, impartial and comply fully with the FRC ethical standards and any relevant professional or statutory guidance. Auditors will report in public and make recommendations on what they find without being influenced by fear or favour.</p> <p>Our independence confirmation letter (Appendix two) discloses matters relating to our independence and objectivity including any relationships that may bear on the firm’s independence and the integrity and objectivity of the audit engagement partner and audit staff.</p> <p>We confirm that, in our professional judgement, KPMG LLP is independent within the meaning of regulatory and professional requirements and that the objectivity of the Director and audit staff is not impaired.</p>
Proportionate and risk based
Audit work should be proportionate and risk based. Auditors need to exercise professional scepticism and demonstrate that they understand the environment in which public policy and services operate. Work undertaken should be tailored to the circumstances of the audit and the audit risks identified. Audit findings and judgements made must be supported by appropriate levels of evidence and explanations. Auditors will draw on public bodies’ self-assessment and self - evaluation evidence when assessing and identifying audit risk.
Quality focused
Auditors should ensure that audits are conducted in a manner that will demonstrate that the relevant ethical and professional standards are complied with and that there are appropriate quality-control arrangements in place as required by statute and professional standards.

Appendix eight

Audit Scotland code of audit practice – responsibility of auditors and management (continued)

Responsibilities of auditors
Coordinated and integrated
It is important that auditors coordinate their work with internal audit, Audit Scotland, other external auditors and relevant scrutiny bodies to recognise the increasing integration of service delivery and partnership working within the public sector. This would help secure value for money by removing unnecessary duplication and also provide a clear programme of scrutiny activity for audited bodies.
Public focussed
The work undertaken by external audit is carried out for the public, including their elected representatives, and in its interest. The use of public money means that public audit must be planned and undertaken from a wider perspective than in the private sector and include aspects of public stewardship and best value. It will also recognise that public bodies may operate and deliver services through partnerships, arm’s-length external organisations (ALEOs) or other forms of joint working with other public, private or third sector bodies.
Transparent
Auditors, when planning and reporting their work, should be clear about what, why and how they audit. To support transparency the main audit outputs should be of relevance to the public and focus on the significant issues arising from the audit.
Adds value
It is important that auditors recognise the implications of their audit work, including their wider scope responsibilities, and that they clearly demonstrate that they add value or have an impact in the work that they do. This means that public audit should provide clear judgements and conclusions on how well the audited body has discharged its responsibilities and how well they have demonstrated the effectiveness of their arrangements. Auditors should make appropriate and proportionate recommendations for improvement where significant risks are identified.



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PERTH AND KINROSS COUNCIL

Audit Committee

28 March 2022

NATIONAL FRAUD INITIATIVE 2020/21 OUTCOMES

**Report by the Chief Internal Auditor
(Report No. 22/66)**

PURPOSE OF REPORT

This report outlines the action that has been taken by Perth & Kinross Council in response to the requirements of the National Fraud Initiative for 2020/21.

1. BACKGROUND / MAIN ISSUES

- 1.1 The National Fraud Initiative constitutes a sophisticated data matching exercise matching electronic data within and between participating public bodies to assist in the prevention and detection of fraud. The NFI exercise in Scotland is Audit Scotland’s data matching exercise that runs every two years in line with the published timetable. The Cabinet Office administers the NFI and processes the data on behalf of Audit Scotland. This 2018/19 exercise represents the seventh NFI data matching to be undertaken in Scotland.
- 1.2 The overall aims of the NFI are to serve the public interest by safeguarding public money against losses from fraud or misappropriation and to contribute towards the fight against fraud. It improves the use made of public resources by identifying anomalies in the data held by different authorities and by ensuring that these are highlighted for further investigation. Whilst it is designed to detect fraud, it may also identify instances of administration error or inaccurate data.
- 1.3 The NFI exercise helps participating bodies (such as Local Authorities, Police Scotland, Scottish Fire and Rescue and the other public sector bodies) to identify possible cases of fraud and detect and correct any consequential under or overpayments. The NFI also helps Auditors in assessing the Council’s arrangements for preventing, deterring and detecting fraud.
- 1.4 There are broadly three stages in the NFI process:
 - 1. The submission of the required datasets by public authorities and other organisations
 - 2. The processing of the data (data matching) in order to identify anomalies
 - 3. The investigation of the highlighted and reported anomalies

- 1.5 The Council is responsible for stages 1 and 3; processing of the data (stage 2) is carried out under arrangements put in place by the Cabinet Office. The reported findings of the 2018/19 exercise was presented to Audit Committee in February 2020 (Report [20/41](#) refers)
- 1.6 Internal Audit acts as a facilitator within the Council and maintains regular contact with Services and external audit to ensure that the former are progressing investigations in accordance with the NFI timetable and guidance.
- 1.7 The Audit Committee is aware that Perth & Kinross Council is one of two local authorities which do not provide the Electoral Roll for the NFI. Legislation to allow Audit Scotland to require Councils to provide information for NFI purposes was introduced after the 2008/09 exercise, subject to any sharing being compliant with data protection legislation. However, the advice from Legal Services is that this does not permit the Council to submit the Electoral Register as there are specific legal restrictions in place which limit the Council's ability to share the Electoral Register. Audit Scotland is aware of the Council's position.
- 1.8 Consequently, Perth & Kinross Council does not use the NFI model for checking eligibility to Council Tax's single occupancy discount. As an alternative to manage risks associated with not providing this information, we engage an external agency to carry out such checks on our behalf. This exercise is ongoing at present and the outcomes from this separate exercise will be reported to a future meeting of the Audit Committee, once the exercise has concluded.
- 1.9 This report presents a summary of progress and the outcomes of the Perth and Kinross Council NFI 2020/21 exercise.

2. 2020/21 OUTCOMES FOR PERTH & KINROSS

- 2.1 A total of 85 reports detailing different data matches were received in respect of Perth and Kinross Council. As at 4 March 2022, these reports contained 12,471 matches, of which 146 matches were regarded as high risk. In addition to investigating these matches, Services have reviewed the remaining matches and investigated a proportion of these using a risk based approach. In total, 8,796 matches have been investigated, which represents over 70% of all matches. Progress has been made with investigating matches, with the exercise concluded and no matches requiring further investigation.
- 2.2 Of the 8,796 fully investigated matches, the level of overpayments identified was £25,370.90. This comprises benefit outcomes totalling £869.27, with the remainder identified as relating to business rates matches, which was a new addition to the NFI as a result of business grants paid as a result of the COVID-19 pandemic. This compares with the outcomes for the 2018/19 exercise being £6,625.67 which related to Benefits matches only. Action is taking place, where possible, to ensure that the outcomes are recovered or reported to the DWP for appropriate action.

2.3 Information relating to the national outcomes will be made available later in the year by Audit Scotland.

3. CONCLUSION AND RECOMMENDATIONS

3.1 Perth & Kinross Council takes seriously its obligations for taking part in the NFI exercise and the 2020/21 exercise is now completed.

3.2 The Committee is asked to note this report, which outlines the action taken by Perth & Kinross Council in response to the requirements of the National Fraud Initiative and the outcomes for the 2020/21 exercise.

3.3 The Committee is also asked to note the actions taken by the Revenues & Benefits Service as a result of the non-provision of electoral register information.

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If you or someone you know would like a copy of this document in another language or format, (on occasion, only a summary of the document will be provided in translation), this can be arranged by contacting the Customer Service Centre on 01738 475000.

You can also send us a text message on 07824 498145.

All Council Services can offer a telephone translation facility.

1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	Yes / None
Community Plan / Single Outcome Agreement	None
Strategic Plan	Yes
Resource Implications	
Financial	None
Workforce	None
Asset Management (land, property, IST)	None
Assessments	
Equality Impact Assessment	Yes
Strategic Environmental Assessment	None
Sustainability (community, economic, environmental)	None
Legal and Governance	None
Risk	Yes
Consultation	
Internal	Yes
External	None
Communication	
Communications Plan	None

1. Strategic Implications

Corporate Plan

1.1 The Council's Corporate Plan 2018 – 2022 lays out five outcome focussed strategic objectives which provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. They are as follows:

- (i) Giving every child the best start in life;
- (ii) Developing educated, responsible and informed citizens;
- (iii) Promoting a prosperous, inclusive and sustainable economy;
- (iv) Supporting people to lead independent, healthy and active lives; and
- (v) Creating a safe and sustainable place for future generations.

1.2 This report relates to all of these objectives.

2. Assessments

Equality Impact Assessment

2.1 Under the Equality Act 2010, the Council is required to eliminate discrimination, advance equality of opportunity, and foster good relations between equality groups. Carrying out Equality Impact Assessments for plans and policies allows the Council to demonstrate that it is meeting these duties.

- 2.2 The information contained within this report has been considered under the Corporate Equalities Impact Assessment process (EqIA) and has been assessed as **not relevant** for the purposes of EqIA.

Risk

- 2.3 The risks are associated with the level of assurance provided on the controls in place for Single Occupancy Discounts.

3. Consultation

Internal

- 3.1 The Chief Executive and Head of Legal and Governance have been consulted in the preparation of this report.

2. BACKGROUND PAPERS

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above report.

