

Public Document Pack

Lancashire Combined Fire Authority Audit Committee

Tuesday, 28 November 2023 in Main Conference Room, Service Headquarters, Fulwood commencing at 10.00 am.

If you have any queries regarding the agenda papers or require any further information, please initially contact Diane Brooks on telephone number Preston (01772) 866720 and she will be pleased to assist.

Agenda

Part 1 (open to press and public)

Chairman's Announcement – Openness of Local Government Bodies Regulations 2014

Any persons present at the meeting may photograph, film or record the proceedings, during the public part of the agenda. Any member of the press and public who objects to being photographed, filmed or recorded should let it be known to the Chairman who will then instruct that those persons are not photographed, filmed or recorded.

1. **Apologies for Absence**

2. **Disclosure of Pecuniary and Non-Pecuniary Interests**

Members are asked to consider any pecuniary and non-pecuniary interests they may have to disclose to the meeting in relation to matters under consideration on the agenda.

3. **Minutes of the Previous Meeting (Pages 1 - 10)**

4. **External Audit - Addendum to the Annual Audit Plan (Pages 11 - 18)**

5. **External Audit - Audit Findings Report (Pages 19 - 60)**

6. **External Audit - Letter of Representation (Pages 61 - 68)**

7. **External Audit Fees (Pages 69 - 74)**

8. **Internal Audit - Monitoring Report (Pages 75 - 82)**

9. **Date of Next Meeting**

The next scheduled meeting of the Committee has been agreed for 10:00 hours on **28 March 2024** in the Main Conference Room, Service Headquarters, Fulwood.

Further meetings are: scheduled for 25 July 2024 and 26 September 2024
proposed for 28 November 2024

10. **Urgent Business**

An item of business may only be considered under this heading where, by reason of special circumstances to be recorded in the Minutes, the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency. Wherever possible, the Clerk should be given advance warning of any Member's intention to raise a matter under this heading.

11. **Exclusion of Press and Public**

The Committee is asked to consider whether, under Section 100A(4) of the Local Government Act 1972, they consider that the public should be excluded from the meeting during consideration of the following items of business on the grounds that there would be a likely disclosure of exempt information as defined in the appropriate paragraph of Part 1 of Schedule 12A to the Local Government Act 1972, indicated under the heading to the item.

PART 2

12. **Urgent Business (Part 2)**

An item of business may only be considered under this heading where, by reason of special circumstances to be recorded in the Minutes, the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency. Wherever possible, the Clerk should be given advance warning of any Member's intention to raise a matter under this heading.

Lancashire Combined Fire Authority Audit Committee

**Tuesday, 25 July 2023, at 10.00 am in the Main Conference Room,
Service Headquarters, Fulwood.**

Minutes

Present:	
Councillors	
J Shedwick (Chair)	
N Hennessy (Vice-Chair)	
S Clarke	
M Dad	
F Jackson	
J Singleton	
Officers	
S Brown, Director of Corporate Services (LFRS)	
J Meadows, Head of Finance (LFRS)	
L Barr, Member Services Officer (LFRS)	
In attendance	
L Rix, Internal Audit, Lancashire County Council	
A Dalecki, Internal Audit, Lancashire County Council	
S Hobson, Internal Audit, Lancashire County Council	
G Jones, External Audit, Grant Thornton	
D Shaw, FBU	
1/23	Apologies for Absence
	Apologies for absence were received from County Councillor Andrea Kay.
2/23	Disclosure of Pecuniary and Non-Pecuniary Interests
	None received.
3/23	Minutes of the Previous Meeting
	Resolved: That the Minutes of the last meeting held on 28 March 2023 be confirmed as a correct record and signed by the Chairman.

4/23	<p>External Audit - Audit Plan 2022/23</p>
	<p>The Chair, County Councillor Shedwick welcomed Georgia Jones, Audit Manager, Grant Thornton who presented the Audit Plan 2022/23.</p> <p>It was noted that the external auditors were required to produce an annual audit plan, setting out the areas intended for review during the year.</p> <p>Members considered the Audit Plan which included key matters that impacted on the audit, details of significant risks identified and the key aspects of proposed response to the risk, other matters, progress against prior year recommendations, Grant Thornton’s approach to materiality, IT audit strategy, value for money arrangements, audit logistics and team, audit fees, independence and non-audit services, and communication of audit matters with those charged with governance.</p> <p>The proposed audit fee took account of the agreed base fee of £29.3k (as set by Public Sector Audit Appointments (PSAA)) plus a further £14.5k to reflect the additional work required reflected in the audit plan as presented. This resulted in a total fee of £43.8k (last year’s agreed fee was £40.8k).</p> <p>Updates on the management over-ride of controls risk, prior year audit recommendations, value for money arrangements, and the IT audit strategy and the implementation of the Oracle Fusion: E Business Suite Finance and Payroll system would be provided later in the year.</p> <p>In response to a statement from County Councillor Clarke in relation to audit fees, The Chair stated that the previous year’s fee was £40,000 which was set by the PSAA and the £3,000 fee increase for the current year resonated across local government and external audit fees. Georgia Jones explained that the original fees by the PSAA were set 5 years prior to the contract for 2023/2024. Each year, they faced increased demand from the regulator around requirements and had to charge the Service for the work undertaken.</p> <p>In response to a question from County Councillor Singleton regarding whether the auditors had received the draft accounts, Georgia Jones replied that the draft account had not yet been received. The Chair added that the draft accounts would be addressed later in the agenda.</p> <p>County Councillor Singleton asked if there was a date for the Audit Findings Report. Georgia Jones explained the timetable for the year was for financial statements to be prepared by the end of May with the target date for audit being 1 September which many organisations were finding difficult to meet. She could not give a date for issuing the Audit Findings Report until they had received the draft statements.</p> <p>Resolved: - That the Audit Committee agreed the external audit plan for 2022/23 and the increased fee.</p>
5/23	<p>Internal Audit Annual Report 2022/23</p>
	<p>The Chair, County Councillor Shedwick introduced Laura Rix, Senior Auditor. Laura</p>

Rix requested, and it was agreed, that agenda item 6 (Internal Audit Annual Report 2022/23) be presented before item 5 (Internal Audit Monitoring Report).

The report was presented by Laura Rix. The Internal Audit Annual Report summarised the work that the Internal Audit Service had undertaken during 2022/23 and the key themes arising from it. It provided an opinion on the overall adequacy and effectiveness of the systems of governance, risk management and internal control.

On the basis of programme of work for the year, the Senior Internal Auditor provided substantial assurance over the adequacy of design and effectiveness in operation of the organisation's frameworks of governance, risk management and control.

The opinion was based on the work the Internal Audit Service performed during 2022/23 and 2023/24 in relation to the 2022/23 audit plan, as approved by the Audit Committee in March 2022.

Internal Audit Work Undertaken

Laura Rix highlighted that it had been a positive year with 8 (72%) agreed actions being implemented, 2 (18%) in progress and 1(10%) superseded. All budgeted days (70) had been spent in delivering the audit plan. All 2022/23 work had been completed.

Overall governance, risk management and control arrangements

A high-level review was completed in April 2023 and no areas of concern were noted. Although the introduction of Fusion had caused some practical issues, additional controls had been introduced to mitigate any risks.

Recruitment – Positive Action

The audit report was completed in January 2023.

Carbon Management Arrangements

The audit report was completed in April 2023.

Accounts payable, Accounts receivable and General ledger

Audit work across each of these three key financial systems was completed in March 2023.

HR and Payroll

The review was completed in November 2022.

Pensions administration

Assurance over the operation of the Pension Fund had been obtained from work conducted directly by Lancashire County Council's Internal Audit Service, work undertaken by the Local Pensions Partnership (Administration) Ltd, (LPPA) Internal Audit, and by KPMG for the Local Pension Partnership (Investments) Ltd (LPPI).

Treasury Management

The review was completed in October 2022. No areas for improvement were

identified.

Follow up audit activity

Training, Learning and Development

Follow up work was completed during February 2022. Six actions had been implemented.

Management of On Call provision

Follow up work was completed in June 2023. Two actions had been implemented and two were progressing.

Laura Rix highlighted that, since the last meeting in March, 2 audits had been finalised: Carbon Management and follow-up work on the On-Call Provision.

Overall, the audit provided substantial assurance regarding the adequacy of design and effectiveness in operation of the Authority's frameworks of governance, risk management and control. No significant areas of weakness in overall governance, risk management or control had been identified.

It was acknowledged that the introduction of Fusion had caused some practical issues within LFRS and Internal Audit were satisfied that additional controls had been introduced to mitigate any risks.

Other components of the audit plan

National Fraud Initiative

Following the submission of data in October and November 2022, the resulting matches were released by the Cabinet Office in January and February 2023. The table in the report detailed the total number of matches identified. Limited action had been taken to process the matches due to the timing of the release and LFRS operational pressures such as Fusion. Action would progress later in the year.

County Councillor Singleton asked why there was no assurance opinion on the work completed on overall governance, risk management and control arrangements (page 44 of the agenda). Laura Rix explained that the work was continuous and linked to the overall opinion of the Authority's frameworks of governance, risk management and internal control through resources reports, committee reports and external assurance received throughout the year.

County Councillor Singleton noted that the follow up work had been implemented and asked if completion dates were in place for the non-conformities. Laura Rix confirmed that there were timeframes for non-conformities to be applied but policies were being embedded and therefore, they were still progressing.

The Chair commented that he was pleased with the number of substantial assurances in the annual report.

Resolved: - That the Audit Committee noted and endorsed the report.

6/23	<p>Internal Audit Monitoring Report</p>
	<p>The Internal Auditors produced a summary of progress against the annual plan for each Audit Committee meeting, setting out progress to date and any significant findings. The report for the period up to 12 June 2023 was presented by Laura Rix, Senior Auditor.</p> <p>To date, 1 day had been spent this financial year on completion of the 2023/24 plan and work to progress the internal audit plan would begin in October. The table in the report provided a summary of the assignments that comprised the 2022/23 audit plan.</p> <p>Since the 2022/23 audit plan was agreed, an additional Audit had been requested by the Director of Corporate Services on District Planning. The proposed additional resources that would be required was approximately 10 days which had been provisionally added to the plan.</p> <p>The Director of Corporate Services explained that, in regard to district planning, HMICFRS required information from Lancashire Fire and Rescue Service relating to planning activity and how the Service plan was being delivered throughout the organisation. Each district in Lancashire had a number of fire stations, through which, the Service plan was delivered with a targeted approach to that area. Each district had its own plan which would be assessed on how it was delivered, monitored, and reported through governance arrangements. It was considered valuable to have an independent assessment to discuss with the Inspectorate and take learning from.</p> <p>County Councillor Dad stated that, in relation to district planning, it was good practice to learn from other sources to improve an already excellent Service and asked that Members were kept updated so they too could be educated.</p> <p>Resolved: That the Committee noted and endorsed the report.</p>
7/23	<p>Annual Governance Statement</p>
	<p>The Director of Corporate Services presented the report. The Authority was required to publish an Annual Governance Statement along with the Authority's financial statements, following a review of the effectiveness of the internal controls in place. The report and the statements set out the key elements of the Authority's governance framework, how these had been evaluated, the outcome of the assessment of effectiveness and any areas for improvement.</p> <p>The Audit Committee had previously approved a Code of Corporate Governance, in line with guidance produced jointly by CIPFA (Chartered Institute of Public Finance Accountants) and SOLACE (Society of Local Authority Chief Executives). The Code defined corporate governance as the way an authority ensured that it was doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner.</p> <p>In order to assess the effectiveness of the Authority's current arrangements a self-assessment had been undertaken by the Executive Board who had considered the</p>

various sources of assurance that supported the core principles outlined in the report and the outcome of this was considered by Members under appendix 1 as now presented. One of the key elements of this was external assurance of the systems, and this was provided by internal and external auditors, both of whom provided positive reports, and by the HMICFRS Inspection which rated the Service as Good.

The assessment also considered recommendations made as part of last year's Annual Governance Statement i) a project to replace the existing Performance Management System would commence; ii) an upgraded Finance system would be implemented in April 2022 and the Service would review and implement improvements to the monthly budget monitoring process which made greater use of additional functionality provided; iii) the Core Code of Ethics would be embedded into the corporate policy, and recruitment and promotion process.

It was noted that as a result of various reviews the following area had been identified for further improvement: -

- Identify a mechanism to report to Members of the CFA our response to national recommendations made by the HMICFRS during the year.

As part of the review, the Service was required to identify and disclose any significant internal control issues, of which there had been none, hence the overall conclusion was that the system of internal controls was adequate.

In response to a question from County Councillor Singleton in relation to completion dates for 2 areas for improvement that were listed as 'on-going' in Last Year's Annual Governance Statement, the Director of Corporate Services informed that they would be completed within the financial year and a date for completion would be added before the Chair signed the statement.

Resolved: That the Committee noted and endorsed the self-assessment and the Annual Governance Statement based on this and recommended that the Chairman of the Authority sign the Statement once the added dates for completion of the 2 areas for improvement had been added.

8/23

Accounting Estimates

The Director of Corporate Services presented the report. It was noted that the International Standard on Auditing (ISA) 540: Auditing Accounting Estimates and Related Disclosures was revised in December 2018 by the International Auditing and Assurance Standards Board (IAASB), an independent standard-setting body that served the public interest by setting high-quality international standards for auditing, quality control, and review. The auditing standard was revised because Statement of Accounts were increasingly subject to judgements and estimations performed by management and experts on a range of items within them, as required by current accounting standards. These changes required that auditors should understand and evaluate: "the nature and extent of oversight and governance that the entity has in place over management's financial reporting process relevant to the accounting estimates."

The Audit Committee needed to understand what significant estimates would be included within the Statement of Accounts which were those that:

- Required significant judgement by management to address subjectivity;
- Had high estimation uncertainty;
- Were complex to make;
- Had, or ought to have had, a change in method, assumptions or data compared to previous periods; or
- Involved significant assumptions.

The Statement of Accounts contained estimated figures that were based on assumptions about the future or that were otherwise uncertain. Estimates considered past and current trends and/or other relevant factors. However, because balances could not be determined with certainty, actual results could be materially different from the assumptions and estimates.

It was noted that the Statement of Accounts were prepared with the underlying significant assumption of Going Concern, which meant that the Authority considered its financial position to be stable for the foreseeable future, as assessed at the most recent budget setting exercise finalised in February 2023. Accounting standards required that management made an annual assessment of going concern, although the Code recognised that Local Authorities could not be created or dissolved without statutory prescription, the accounts must therefore be prepared on a Going Concern basis. Management had prepared the assessment in line with requirements.

Members considered the significant Accounting Estimates for 2022/23 including the: estimated value, degree of uncertainty and methodology used for the: i) valuation of land and buildings; ii) depreciation of property and equipment; iii) valuation of both Firefighter and Local Government Pension Scheme (LGPS) liability; iv) valuation of LGPS pension asset; v) fair value measurement – private finance initiative schemes; and vi) holiday pay expenditure accrual.

It was noted that each year Executive Board was asked to consider whether there were any transactions, events, or conditions (or changes in these) that might trigger the recognition of an additional significant accounting estimate, or the potential recognition, known as a contingent liability. Based on the returns received from Executive Board, the contingent liabilities note had been updated to reflect the current position, but there were no further significant events or transactions identified by this process.

Resolved: - That the report be noted and the accounting estimates as reported be endorsed.

9/23

Financial Statements Update

The Director of Corporate Services provided the committee with an update on the preparation of the Authority's 2022/23 unaudited financial statements and included the draft core financial statements for information; the Comprehensive Income and Expenditure Account, Movement in Reserves Statement and Balance Sheet.

The Accounts and Audit (amendment) Regulations 2022 came into force on 22 July 2022 and revised the statutory deadline for publishing the audited financial statements to 30 September for 2022/23 accounts and the subsequent 5 years. The deadline for the Authority to produce and publish draft accounts had reverted back to 31 May 2022/23 as per the Accounts and Audit Regulations 2015.

At the previous meeting, the Committee was advised that due to changes in the finance teams and delays implementing the new financial system, the Authority sought to produce their draft set of financial statements for 2022/23 by 31 July 2023. At the time the report was written, the Authority had produced a first draft of the financial statements and its quality assurance processes had now commenced.

There was a requirement to obtain certification of the accounts by the Responsible Financial Officer (RFO); for the Authority, this was the Director of Corporate Services. It would be completed by the end of July and the draft statements published on the Authority's website.

The Accounts and Audit (England) Regulations 2015 applied to the preparation, approval and audit of the Statement of Accounts and other financial statements. The regulations were based on International Financial Reporting Standards (IFRS) which attempted to standardise accounts in a consistent format across both the public and private sectors with the aim of achieving greater transparency. The table in the report summarised the adjustments required to the revenue outturn to reach the Total Comprehensive Income and Expenditure and reported in the financial statements.

The draft Comprehensive Income and Expenditure Account, Movement in Reserves Statement and Balance Sheet were set out Appendix 1. Subject to changes as part of the Quality Assurance Processes, they would form part of the accounts for audit.

It was noted that the Authority now had a reserve balance of £4.5m and in that figure was the quarter share in North West Fire Control. The balance sheet showed the pension reserve left an underlying deficit position, but once that was stripped away, the Service was in a positive position.

The Director of Corporate Services highlighted that all members of the finance team were fairly new to the Service and had carried out an incredible amount of work to make sure the Authority was in a promising position.

Georgia Jones, Audit manager, explained that, to manage expectations, if they received the draft accounts in the upcoming weeks, they would be unable to start work immediately as they would have to manage resources and capacity within the team but assured that the work would be completed as soon as possible.

County Councillor Clarke commented that it had become clear that the unusable reserves on the balance sheet were mainly due to pensions.

County Councillor Singleton asked how confident the finance team were that they could produce the draft financial statements by 31 July and the Director of Corporate service confirmed that they were very confident.

	<p>County Councillor Hennessy invited the new officers from the finance team to future meetings of the Audit Committee for the experience, which the Director of Corporate Services agreed.</p> <p>Resolved: - That the committee noted the update with progress in preparing the unaudited Financial Statements; and noted the Authority's draft core financial statements that would form part of the 2022/23 unaudited Financial Statements.</p>
10/23	<p>External Audit - Understanding How the Audit Committee Gains Assurance from Management</p>
	<p>It was noted that in order to comply with Auditing Standards, the External Auditors, Grant Thornton needed to establish an understanding of the management processes in place to prevent and detect fraud and to ensure compliance with laws and regulations. They were also required to make enquiries of both management and those charged with governance as to their knowledge of any actual, suspected or alleged fraud.</p> <p>International auditing standards placed certain obligations on auditors to document managements' view on some key areas that affected the financial statements. In addition to the request to management, they also needed to gain an understanding of how those charged with governance maintained oversight of the above processes as set out in letters to management (Executive Board) and the Chair of the Audit Committee as now considered alongside separate responses.</p> <p>Resolved: That the Committee noted and endorsed the response submitted by the Executive Board and approved the response by the Chair of the Audit Committee for submission.</p>
11/23	<p>Date of Next Meeting</p>
	<p>The next meeting of the Committee would be held on 26 September 2023 at 10:00 hours in the Main Conference Room at Lancashire Fire and Rescue Service Headquarters, Fulwood.</p> <p>Further meeting dates were noted for 28 November 2023 and 28 March 2024 and agreed for 25 July 2024.</p>

**M Nolan
Clerk to CFA**

**LFRS HQ
Fulwood**

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Lancashire Combined Fire Authority Audit Committee

Meeting to be held on 28 November 2023

External Audit – Addendum to the Audit Plan

(Appendix 1 refers)

Contact for further information:

Steven Brown - Director of Corporate Services – Telephone Number 01772 826804

Executive Summary

This report provides an update to the audit plan agreed by the Audit Committee on 25 July 2023 to reflect an additional risk identified relating to incomplete or inaccurate information transferred to the new general ledger hosted by Lancashire County Council.

Recommendation

The Committee is asked to note and endorse the report.

Information

The additional risk identified will require additional work in order to respond to this risk including a review of the IT environment to document and evaluate controls and map closing balances from the previous ledger to the opening balances in the new ledger.

Financial Implications

These will be provided in a separate update to the Audit Committee.

Business Risk Implications

None

Environmental Impact

None

Equality and Diversity Implications

None

Human Resource Implications

None

Local Government (Access to Information) Act 1985
List of Background Papers

Paper:

Date:

Contact:

Reason for inclusion in Part 2 if appropriate: N/A

Addendum to the Audit Plan

Year ended 31 March 2023

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

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Introduction

Purpose

This document provides an update to the Audit Plan for Lancashire Combined Fire Authority (the Authority) for 2022/23 for those charged with governance.

Updated significant risks

Our initial Audit Plan for 2022/23 was presented to the 25 July 2023 Audit Committee and included those significant risks which require special audit consideration and procedures to address the likelihood of a material financial statement error. These were:

- Management override of controls
- Valuation of land and buildings
- Valuation of net pension fund liability.

Since our initial plan was presented, we have identified an additional significant risk requiring audit consideration in relation to the in-year transfer from the Oracle E- Business Suite (EBS) ledger system to Oracle Fusion, which is a cloud-based system.

Lancashire County Council (LCC) host the Oracle Fusion system on behalf of Lancashire Combined Fire Authority and process employee, supplier and customer personal and financial data.

The significant risk arising is:

- Incomplete or inaccurate financial information transferred to the new general ledger.

The detail is set out on page 4.

Impact on the fee for 2022/23

The addition of another significant risk areas will involve more audit work and will result in additional audit fee. We will provide an update in our reporting to the Audit Committee, as the audit work is currently in progress.

Significant risks identified

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

Our initial Audit Plan from July 2023 noted three significant risks, as detailed on page 3. We have identified a further significant risk as set out below.

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
<p>New General Ledger Incomplete or inaccurate financial information transferred to the new general ledger</p>	<p>In January 2023 Lancashire Combined Fire Authority moved from using Oracle E- Business Suite (EBS) ledger system to Oracle Fusion, which is a cloud-based system.</p> <p>Lancashire County Council (LCC) host the Oracle Fusion system on behalf of Lancashire Combined Fire Authority and process employee, supplier and customer personal and financial data.</p> <p>It is important when implementing a new significant accounting system that sufficient controls are in place to ensure the integrity of the data. There is also a risk over the completeness and accuracy of the data transfer from the previous ledger system and potential challenges in producing robust control account reconciliations and detailed transaction reports.</p> <p>We are aware that LCC experienced problems with the data migration from the Oracle EBS to Fusion system and there were also instances of data breaches.</p> <p>We have therefore identified the completeness and accuracy of the transfer of financial information to the new general ledger system as a significant risk which was one of the most significant assessed risks of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none">• complete an information technology (IT) environment review by our IT specialists to document and evaluate the design and implementation of controls within the new general ledger system; and• map the closing balances from the previous general ledger to the opening balance position in the new ledger to ensure accuracy and completeness of the financial information.

IT audit strategy

In accordance with ISA [UK] 315 Revised, we are required to obtain an understanding of the relevant IT and technical infrastructure and details of the processes that operate within the IT environment. We are also required to consider the information captured to identify any audit relevant risks and design appropriate audit procedures in response. As part of this we obtain an understanding of the controls operating over relevant Information Technology (IT) systems i.e., IT general controls (ITGCs). Our audit will include completing an assessment of the design and implementation of relevant ITGCs.

The following IT systems have been judged to be in scope for our audit and based on the planned financial statement audit approach we will perform the indicated level of assessment:

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IT system	Audit area	Planned level IT audit assessment
Oracle Fusion: E-Business Suite Finance and Payroll	Financial reporting	<ul style="list-style-type: none">Roll-forward procedures linked to prior year detailed ITGC assessment (design and operating effectiveness)
Oracle Fusion Cloud	Financial reporting	<ul style="list-style-type: none">Detailed ITGC assessment (design and operating effectiveness)

Lancashire Combined Fire Authority Audit Committee

Meeting to be held on 28 November 2023

External Audit Findings Report (Appendix 1 refers)

Contact for further information:

Steven Brown - Director of Corporate Services – Telephone Number 01772 826804

Executive Summary

The external auditor is required to produce an Audit Findings Report summarising the conclusions from their work undertaken as part of the year-end audit of accounts. As highlighted in the report work is substantially complete and subject to resolution of some outstanding matters there are no matters which require modification of the audit opinion or material changes to the financial statements.

The Value for Money (VFM) work has not yet been completed so the external auditor is not yet in a position to issue the Auditors Annual Report; this is expected to be reported by December 2023.

Recommendation

The Committee is asked to note and endorse the matters raised in the report and two recommendations and management responses on page 26 of the report.

Information

Under the statutory Code of Audit Practice for Local Government bodies our external auditors Grant Thornton are required to issue a report to those charged with governance summarising the conclusions from their audit work. This draft report, known as the Audit Findings Report, is attached as Appendix 1, and will be presented by the Audit Manager.

The report sets out that the audit is substantially complete. There are two recommendations that are agreed by management; one relating to a review of the fixed asset register to ensure excess depreciation is not charged against fully depreciated assets and to consider if the general ledger can be updated to include additional journal details which has now been implemented.

The report sets out the matters still outstanding and that the VFM work will be reported before the end of the calendar year.

Financial Implications

Audit fees are set out in the appendix.

Business Risk Implications

None

Environmental Impact

None

Equality and Diversity Implications

None

Human Resource Implications

None

**Local Government (Access to Information) Act 1985
List of Background Papers**

Paper:

Date:

Contact:

Reason for inclusion in Part 2 if appropriate: N/A

The Audit Findings for Lancashire Combined Fire Authority

Year ended 31 March 2023



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

This Audit Findings presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260. Its contents have been discussed with management and the Audit Committee.

Georgia Jones

For Grant Thornton UK LLP

Date: November 2023

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1. Headlines

This table summarises the key findings and other matters arising from the statutory audit of Lancashire Combined Fire Authority's ('the Authority') and the preparation of the Authority's financial statements for the year ended 31 March 2023 for the attention of those charged with governance.

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Financial Statements

Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- the Authority's financial statements give a true and fair view of the financial position of the Authority and its income and expenditure for the year; and
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

We are also required to report whether other information published together with the audited financial statements (including the Annual Governance Statement (AGS) and Narrative Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

Our audit work is currently ongoing but is substantially complete. Our findings to date are summarised on the following pages.

Audit adjustments are detailed in Appendix D. We have also raised recommendations for management as a result of our audit work. These are set out in Appendix B. Our follow up of recommendations from the prior year's audit are detailed in Appendix C.

Our work is in progress and nearing completion. At this time there are no matters of which we are aware that would require modification of our audit opinion [Appendix G] or material changes to the financial statements, subject to the following outstanding matters;

- responses from the pension fund auditor to gain assurances on underpinning controls and supporting data for the pension fund net liability
- an International Financial Reporting Interpretation Committee (IFRIC 14) assessment from the actuary on the amount of pension fund asset (surplus) in the LGPS scheme
- an updated Government Actuary Department (GAD) report to reflect part year inflation for the valuation of the Firefighters pension fund (currently in discussion)
- completing testing on areas of land and buildings valuations, including an assessment of the impact of reinforced autoclaved aerated concrete (RAAC)
- completion of testing on the fair value of financial instruments
- our Information Technology (IT) assessment on the data migration controls to the new Oracle Fusion system
- receipt of management representation letter; and
- review of the final set of financial statements
- final quality procedures.

We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

Our anticipated financial statements audit report opinion will be unqualified.

Our work on the Authority's value for money (VFM) arrangements is not yet complete. The outcome of our VFM work will be reported in our commentary on the Authority's arrangements in our Auditor's Annual Report (AAR). We are satisfied this work does not have a material effect on our opinion on the financial statements for the year ended 31 March 2023.

1. Headlines

Value for Money (VFM) arrangements

Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are required to report in more detail on the Council's overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit.

Auditors are required to report their commentary on the Council's arrangements under the following specified criteria:

- Improving economy, efficiency and effectiveness;
- Financial sustainability; and
- Governance

We have not yet completed all of our VFM work and so are not in a position to issue our Auditor's Annual Report. An audit letter explaining the reasons for the delay is attached in Appendix H. We expect to issue our Auditor's Annual Report to management by December 2023. This is in line with the National Audit Office's revised deadline, which requires the Auditor's Annual Report to be issued no more than three months after the date of the opinion on the financial statements.

As part of our work, we considered whether there were any risks of significant weakness in the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources. We have not identified any significant weaknesses to date however our work is still underway and an update is set out in the value for money arrangements section of this report (see section 3).

Statutory duties

The Local Audit and Accountability Act 2014 ('the Act') also requires us to:

- report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and
- to certify the closure of the audit.

We have not exercised any of our additional statutory powers or duties.

We expect to certify the completion of the audit upon the completion of our work on the Authority's VFM arrangements, which will be reported in our Annual Auditor's report in December 2023.

Significant matters

We did not encounter any significant difficulties or identify any significant matters arising during our audit.

1. Headlines

National context – audit backlog

Nationally there have been significant delays in the completion of audit work and the issuing of audit opinions across the local government sector. Only 12% of local government bodies had received audit opinions in time to publish their 2021/22 accounts by the extended deadline of 30 November. There has not been a significant improvement over this last year, and the situation remains challenging. We at Grant Thornton have a strong desire and a firm commitment to complete as many audits as soon as possible and to address the backlog of unsigned opinions.

Over the course of the last year, Grant Thornton has been working constructively with DLUHC, the FRC and the other audit firms to identify ways of rectifying the challenges which have been faced by our sector, and we recognise the difficulties these backlogs have caused authorities across the country. We have also published a report setting out our consideration of the issues behind the delays and our thoughts on how these could be mitigated. Please see [About time? \[grantthornton.co.uk\]](#)

We would like to thank everyone at the Authority for their support in working with us constructively to get to completion by this point.

National context – level of borrowing

All local government bodies are operating in an increasingly challenging national context. With inflationary pressures placing increasing demands on local government budgets, there are concerns as local government bodies look to alternative ways to generate income. We have seen an increasing number of councils and other local government bodies look to ways of utilising investment property portfolios as sources of recurrent income. Whilst there have been some successful ventures and some prudently funded by local government bodies' existing resources, we have also seen some local government bodies take excessive risks by borrowing sums well in excess of their revenue budgets to finance these investment schemes.

The impact of these huge debts on local government bodies, the risk of potential bad debt write offs and the implications of the poor governance behind some of these decisions are all issues which now have to be considered by auditors across local authority audits.

Lancashire Combined Fire Authority has debt of £2m at 31 March 2023. All the debt is from the Public Works Loans Board (PWLB) and is all at fixed rates of interest and is repayable on maturity. We have not identified any areas of risk in the Authority's Treasury Management activities.

2. Financial Statements

Overview of the scope of our audit

This Audit Findings Report presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice (“the Code”). Its contents have been discussed with management and the Audit Committee.

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

Audit approach

Our audit approach was based on a thorough understanding of the Authority’s business and is risk based, and in particular included:

- An evaluation of the Authority’s internal controls environment, including its IT systems and controls; and
- Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks.

Conclusion

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved, we anticipate issuing an unqualified audit opinion following the Audit Committee meeting on 28 November 2023, as detailed in Appendix G These outstanding items include:

- responses from the pension fund auditor to gain assurances on underpinning controls and supporting data for the pension fund net liability
- an International Financial Reporting Interpretation Committee (IFRIC 14) assessment from the actuary on the amount of pension fund asset (surplus) in the LGPS scheme
- an updated Government Actuary Department (GAD) report to reflect part year inflation for the valuation of the Firefighters pension fund (currently in discussion)
- completing testing on areas of land and buildings valuations, including an assessment of the impact of reinforced autoclaved aerated concrete (RAAC)
- completion of testing on the Fair value of the Financial instruments
- our Information technology (IT) assessment on the data migration controls to the new Oracle Fusion system
- receipt of management representation letter
- review of the final set of financial statements; and
- final quality procedures.

Acknowledgements

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

2. Financial Statements



Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality benchmarks remain the same as reported in our audit plan in June 2023. We set out in this table our determination of materiality for the Authority.

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	Amount (£)	Qualitative factors considered
Materiality for the financial statements	1,181,560	This equates to 2% of your gross operating expenditure for the 2021/22 year (1.88% of 2022/23 gross expenditure) and is considered to be the level above which users of the financial statements would wish to be aware in the context of overall expenditure. This benchmark is considered the most appropriate because we consider users of the financial statements to be most interested in how the Authority has expended its revenue and other funding.
Performance materiality	886,170	The performance materiality has been set at 75% of financial statement materiality. This reflects a standard benchmark based on risk assessed knowledge of potential for errors arising.
Trivial matters	59,100	This is the threshold for matters that are clearly inconsequential, whether taken individually or in aggregate. It is a standard benchmark set at 5% of materiality.



2. Financial Statements: Significant risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

Risks identified in our Audit Plan	Commentary
<p>Management override of controls Under ISA (UK) 240, there is a non-rebuttable presumed risk that the risk of management override of controls is present in all entities. The Authority faces external scrutiny of its spending, and this could potentially place management under undue pressure in terms of how they report performance.</p> <p>We therefore identified management override of control, in particular journals, management estimates, and transactions outside the course of business as a significant risk for the Authority, which was one of the most significant assessed risks of material misstatement.</p>	<p>We have:</p> <ul style="list-style-type: none">• evaluated the design and implementation of management controls over journals• analysed the journals listing and determined the criteria for selecting high risk unusual journals <p>For example:</p> <ul style="list-style-type: none">- journals created by senior management- journals which impacted the financial outturn- year-end adjustment journals <ul style="list-style-type: none">• identified and tested unusual journals made during the year and the accounts production stage for appropriateness and corroboration• gained an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness• reviewed and tested transfers between the General Fund and HRA and inter group journals• evaluated the rationale for any changes in accounting policies, estimates or significant unusual transactions. <p>From our review of all journals posted during the year, we identified 38 higher risk or unusual journals that warranted detailed audit testing. Our testing is still in progress. From the testing carried out to date, there has been no evidence of inappropriate management override of controls through journals.</p> <p>Our commentary on key accounting estimates is set out on pages 13 to 15. We found accounting policies to be appropriate.</p>

2. Financial Statements: Significant risks

Risks identified in our Audit Plan

Improper revenue recognition

Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue.

Practice Note 10, issued by the FRC, states auditors should also consider that material misstatements may occur by the manipulation of expenditure recognition. These presumptions can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition or the manipulation of expenditure recognition.

Having considered the risk factors set out in ISA240 and PN10 and the nature of the expenditure streams at the Fund, we have determined that the risk of fraud arising from revenue recognition and expenditure manipulation can be rebutted, because:

- there is little incentive to manipulate revenue recognition
- opportunities to manipulate revenue recognition and expenditure are very limited
- classes of expenditure that could be prone to manipulation, such as management expenses and payments to and on account of leavers are not material
- the culture and ethical frameworks of local authorities, including Lancashire Combined Fire Authority, mean that all forms of fraud are seen as unacceptable

Therefore we do not consider these to be significant risks for Lancashire Combined Fire Authority.

Commentary

The revenue and expenditure recognition risks have been rebutted. Despite revenue and expenditure recognition not being a significant risk we still undertook the following procedures to ensure that revenue and expenditure included within the accounts is materially correct. To gain this assurance we:

- evaluated the Authority's accounting policies for income and expenditure recognition for appropriateness and compliance with the Code
- updated our understanding of the Authority's system for accounting for income and expenditure and evaluated the design of relevant controls
- undertook detailed substantive testing on the income and expenditure streams in 2021/22.

Our substantive income and expenditure testing has not identified any errors that we are required to bring to your attention.

2. Financial Statements: Significant risks

Risks identified in our Audit Plan

Valuation of land and buildings

The Authority revalues its land and buildings on a rolling five yearly basis with 20% of assets valued each year. In the intervening years the Authority requests a confirmation through a desktop exercise from its engaged valuation expert to ensure that there is no material difference. This valuation £118.327m represents a significant estimate by management in the financial statements due to the size of the numbers involved and the sensitivity of this estimate to changes in key assumptions.

Additionally for land and buildings, management will need to ensure the carrying value in the Authority financial statements is not materially different from the current value or the fair value (for surplus assets) at the financial statements date, where annual valuations are not carried out.

We therefore identified valuation of land and buildings as a significant risk, which was one of the most significant assessed risks of material misstatement.

Commentary

We have:

- updated our understanding of the processes and controls put in place by management to ensure that the Authority's valuation of land and buildings are not materially misstated and evaluate the design of the associated controls
- evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work
- evaluated the competence, capabilities and objectivity of the valuation expert
- discussed with the valuer the basis on which the valuation was carried out
- challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding
- tested revaluations made during the year including investment properties, to see if they had been input correctly into the Authority's asset register
- evaluated the assumptions made by management for those assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value at year end.

As part of our overall audit work we tested 33 asset valuations, including individually large assets or those with unusual movements, as well as a sample across the remainder of the total population. In completing our work we examined the accounting entries, data and assumptions used and relevant asset indices.

This work is ongoing. The Authority has identified it has one property impacted by Reinforced autoclaved aerated concrete (RAAC). This has potentially reduced the value of the property by £840k. We will need to do additional work to gain assurance over the impact on this property and whether there is any other potential impact across the Authority's property portfolio. At this time this has not been adjusted for in the financial statements.

2. Financial Statements: Significant risks

Risks identified in our Audit Plan

Commentary

Valuation of Pension Fund Net Liability

The Authority's pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant estimate in the financial statements.

The pension fund net liability of £619.619m is considered a significant estimate due to the size of the numbers involved and the sensitivity of the estimate to changes in key assumptions.

The methods applied in the calculation of the IAS 19 estimates are routine and commonly applied by all actuarial firms in line with the requirements set out in the Code of practice for local government accounting (the applicable financial reporting framework). However, for the first time since IFRS have been adopted the Authority has had to consider the potential impact of IFRIC 14 - IAS 19 - the limit on a defined benefit asset. Because of this we have assessed the recognition and valuation of the pension asset as a significant risk.

The source data used by the actuaries to produce the IAS 19 estimates is provided by administering authorities and employers. We do not consider this to be a significant risk as this is easily verifiable.

The actuarial assumptions used are the responsibility of the entity but should be set on the advice given by the actuary. A small change in the key assumptions (discount rate, inflation rate, salary increase and life expectancy) can have a significant impact on the estimated IAS 19 liability. In particular the discount and inflation rates, where our consulting actuary has indicated that a 0.1% change in these two assumptions would have approximately 2% effect on the liability. We have therefore concluded that there is a significant risk of material misstatement in the IAS 19 estimate due to the assumptions used in their calculation.

With regard to these assumptions we have therefore identified valuation of the Authority's pension fund net liability as a significant risk.

We have:

- updated our understanding of the processes and controls put in place by management to ensure that the Authority's pension fund net liability is not materially misstated and evaluate the design of the associated controls;
- evaluated the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work;
- assessed the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation;
- assessed the accuracy and completeness of the information provided by the Authority to the actuary to estimate the liability;
- tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary;
- undertaken procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report; and
- obtained assurances from the auditor of Lancashire Pension Fund as to the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements.

Audit commentary

The pension fund net liability of £619.619m is made up of the Firefighters pension scheme net liability of £639.496m and Local Government pension scheme net asset of £19.877m. The Authority should show the pension liability and pension asset as separate balances and not net these off in the financial statements. The Authority has adjusted these in the revised statements (see Appendix D).

Where a pension fund asset arises the Authority should consider the potential impact of International Financial Reporting Interpretation Committee (IFRIC) 14: IAS 19 - The Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction. This limits the amount of any net defined benefit asset to a ceiling which is the present value of those future benefits. The Authority has requested an IFRIC 14 assessment which has not yet been received. We are waiting for this report in order to complete our work in this area.

We are also waiting for assurances from the auditor of the Lancashire Pension Fund.

Discussions are currently progressing with the Government Actuary's Department (GAD) on the level of inflationary increases within their assessment of the year end liability. We will update our findings in this area once these are finalised nationally.

We have not identified any other issues from our testing to date

2. Financial Statements - Observations in respect of other risks (continued)

This section provides commentary on new issues and risks which were identified during the course of the audit that were not previously communicated in the Audit Plan.

Issue	Commentary	Auditor view
<p>New General Ledger Incomplete or inaccurate financial information transferred to the new general ledger</p>	<p>In January 2023 Lancashire Combined Fire Authority moved from using Oracle E- Business Suite (EBS) ledger system to Oracle Fusion, which is a cloud-based system. Lancashire County Council (LCC) host the Oracle Fusion system on behalf of Lancashire Combined Fire Authority and process employee, supplier and customer personal and financial data.</p> <p>It is important when implementing a new significant accounting system that sufficient controls are in place to ensure the integrity of the data. There is also a risk over the completeness and accuracy of the data transfer from the previous ledger system and potential challenges in producing robust control account reconciliations and detailed transaction reports.</p> <p>We are aware that LCC experienced problems with the data migration from the Oracle EBS to Fusion system and there were also instances of data breaches (although our understanding is that these data breaches did not relate to Lancashire Fire and Rescue Service data).</p> <p>We are waiting for conclusions from the IT work examining the controls in place over the data migration and will report this to you once finalised.</p> <p>To gain assurance over the completeness and accuracy of the data migration from Orable EBS to Oracle Fusion for the preparation of the 2022/23 financial statements we carried out a full substantive test on the balance transfer. We found these were all correctly entered in the new Oracle Fusion system.</p>	<p>Although there were control issues over the data migration to the Oracle Fusion system, we found the ledger balances were all correctly transferred for the compilation of the 2022/23 financial statements.</p> <p>Our IT team are currently assessing the process and controls that were in place in relation to the data transfer. We will report further on completion of their work in this area.</p>

2. Financial Statements: key judgements and estimates

This section provides commentary on key estimates and judgements in line with the enhanced requirements for auditors.

Significant judgement or estimate	Summary of management's approach	Audit Comments	Assessment
<p>Other Land & Buildings (OLB) – £81.895m</p> <p>PFI Assets – Land & Buildings – £36.432m</p> <p>Total Land and Building valuations £118.327m</p>	<p>Land and buildings are specialised assets such as fire stations, the Fire HQ and other operational buildings, which are required to be valued at depreciated replacement cost (DRC) at year end, reflecting the cost of a modern equivalent asset necessary to deliver the same service provision. There are only £19k of land and buildings that are not specialised are valued at their existing use (EUV).</p> <p>The Authority has engaged Amcat Limited to complete the valuation of its land and buildings as at 31 March 2023 on a five yearly cyclical basis. 20% of total assets were fully revalued during 2022/23 with the remaining 80% subject to a desktop valuation exercise.</p> <p>The total year end valuation of land and buildings was £118.327m, a net increase of £18.038m from 2021/212 (£100.289m).</p>	<p>We completed the following work.</p> <ul style="list-style-type: none"> We assessed the valuer used as management's expert, Amcat Limited, as competent, capable and objective We have confirmed the completeness and accuracy of the underlying information provided to the valuer used to determine the estimate We have evaluated the method, data and assumptions used by management's expert to derive the accounting estimate to be reasonable We confirmed that the valuation method remains consistent with the prior year We confirmed the consistency of the estimate using information on Local Government asset values movements 22/23 provided by Montagu Evans (appointed by the NAO), and reasonableness of the increase in the estimate We have agreed the General Fund valuation report to the Fixed Asset Register and to the Statement of Accounts We have confirmed the adequacy of the disclosure of the estimate in the financial statements We have confirmed the appropriateness of alternative site assumptions. <p>We consider the level of disclosure in the financial statements to be appropriate.</p> <p>We selected a sample of 33 Land and Buildings valuations to test for appropriate use of valuation assumptions and input data. This work is in progress. To date we have not identified any significant issues.</p>	TBC

Assessment

- [Dark Purple] We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- [Blue] We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- [Grey] We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- [Light Purple] We consider management's process is appropriate and key assumptions are neither optimistic or cautious

2. Financial Statements: key judgements and estimates

Significant judgement or estimate

Summary of management's approach

Audit Comments

Assessment

Firefighters' Pension Scheme Net pension liability – £639.496m

The Authority's total net pension liability at 31 March 2023 is £619.619m (2021/22 £883.434m) comprising the unfunded defined benefit pension obligations of the Firefighters Pension Scheme and the Lancashire County Pension Fund Local Government Pension Scheme.

Firefighter's Pension Scheme

The Authority uses Government Actuary's Department (GAD) to provide actuarial valuations of the Authority's liabilities derived from the Firefighters' Pension Scheme.

A full actuarial valuation is required every four years. The latest full actuarial valuation was completed as at 31 March 2023. A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements. There has been a £246.520m actuarial gain during the year.

Local Government Pension Scheme

The Authority uses Mercers to provide actuarial valuations of the Authority's assets and liabilities derived from the LGPS.

A full actuarial valuation is required every three years. The latest full actuarial valuation was completed as at 31 March 2023. A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements.

- We have completed the following work on the estimate:
- assessed the Authority's actuaries, GAD and Mercer, to be competent, capable and objective.
- performed additional tests in relation to accuracy of contribution figures, benefits paid, and investment returns and have no issues to raise.
- used PwC as our auditor expert to assess the actuary and assumptions made by the actuary – see table below for our comparison of actuarial assumptions:

Assumption	Actuary Value	PwC range	Assessment
Discount rate	4.8%	4.7-4.9%	●
Pension increase rate	2.8%	2.70% p.a. for all employers	●
Salary growth	4.2%	1.25% - 1.50% p.a. above CPI.	●
Life expectancy – Males currently aged 45/65	22.8 21.5 yrs	22.4-24.3 21-22.6 yrs	●
Life expectancy – Females currently aged 45/65	25.6 23.8 yrs	25.3-26.6 23.5-24.7 yrs	●

- confirmed the controls and processes over the completeness and accuracy of the underlying information used to determine the estimate.
- conducted an analytical review to confirm the reasonableness of the Authority's share of LGPS pension assets.
- assessed the reasonableness of the change in estimate.
- reviewed the adequacy of disclosure of estimate in the financial statements.
- confirmed there have been no changes to the valuation methodology since the previous year, other than the updating of key assumptions above.
- Examined the IFRIC 14 assessment of the pension fund asset on the local government scheme

continued

TBC

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LGPS Net pension asset – £19.877m

Total Net pension liability – £619.619m

2. Financial Statements: key judgements and estimates

Significant judgement or estimate	Summary of management's approach	Audit Comments	Assessment
Firefighters' Pension Scheme Net pension liability – £639.496m	<p>The Authority's total net pension liability at 31 March 2023 is £619.619m (2021/22 £883.434m) comprising the unfunded defined benefit pension obligations of the Firefighters Pension Scheme and the Lancashire County Pension Fund Local Government Pension Scheme.</p> <p>Firefighter's Pension Scheme</p> <p>The Authority uses Government Actuary's Department (GAD) to provide actuarial valuations of the Authority's liabilities derived from the Firefighters' Pension Scheme.</p>	<p>Conclusion</p> <p>We are waiting for assurances from the auditor of the Lancashire Pension Fund before we can complete our work in this area. Their response provides assurances on the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements.</p>	TBC
LGPS Net pension asset – £19.877m	<p>A full actuarial valuation is required every four years. The latest full actuarial valuation was completed as at 31 March 2023. A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements. There has been a £246.520m actuarial gain during the year.</p>	<p>The Authority requested an IFRIC 14 assessment during the audit which we are waiting for to complete our work in this area.</p>	
Total Net pension liability – £619.619m	<p>Local Government Pension Scheme</p> <p>The Authority uses Mercers to provide actuarial valuations of the Authority's assets and liabilities derived from the LGPS.</p> <p>A full actuarial valuation is required every three years. The latest full actuarial valuation was completed as at 31 March 2023. A roll forward approach is used in intervening periods which utilises key assumptions such as life expectancy, discount rates, salary growth and investment return. Given the significant value of the net pension fund liability, small changes in assumptions can result in significant valuation movements.</p>	<p>Discussions are currently progressing with the Government Actuary's Department (GAD) on the level of inflationary increases within their assessment of the year end liability. We will update our findings in this area once these are finalised nationally.</p>	

2. Financial Statements: Information Technology

This section provides an overview of results from our assessment of Information Technology (IT) environment and controls which included identifying risks from the use of IT related to business process controls relevant to the financial audit. This includes an overall IT General Control (ITGC) rating per IT system and details of the ratings assigned to individual control areas.

IT application	Level of assessment performed	Overall ITGC rating	ITGC control area rating			Related significant risks/other risks	Additional procedures carried out to address risks arising from our findings
			Security management	Technology acquisition, development and maintenance	Technology infrastructure		
Oracle Fusion: E-Business Suite Finance and Payroll	Financial reporting	●	●	●	●	Data migration from Oracle EBS during 2022/23	<p>To gain assurance over the completeness and accuracy of the data migration from Oracle EBS to Oracle Fusion for the preparation of the 2022/23 financial statements we carried out a full substantive test on the balance transfer. We found these were all correctly entered in the new Oracle Fusion system.</p> <p>Our IT team are currently assessing the process and controls that were in place in relation to the data transfer. We will report further on completion of their work in this area.</p>

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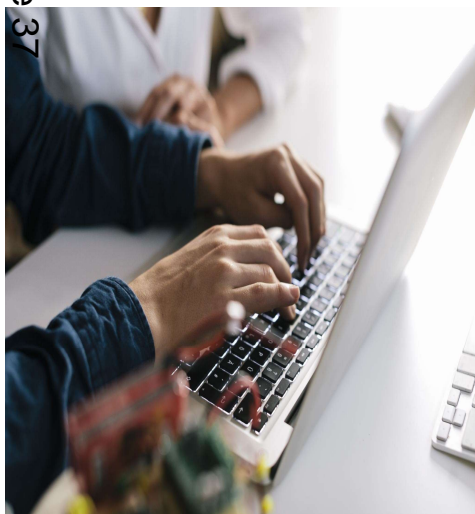
Assessment

- Significant deficiencies identified in IT controls relevant to the audit of financial statements
- Non-significant deficiencies identified in IT controls relevant to the audit of financial statements/significant deficiencies identified but with sufficient mitigation of relevant risk
- IT controls relevant to the audit of financial statements judged to be effective at the level of testing in scope
- Not in scope for testing

2. Financial Statements - other communication requirements

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

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Issue	Commentary
Matters in relation to fraud	We have previously discussed the risk of fraud with the Audit Committee. We have not been made aware of any incidents in the period and no issues have been identified during the course of our audit procedures.
Matters in relation to related parties	We are not aware of any related parties or related party transactions which have not been disclosed.
Matters in relation to laws and regulations	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
Written representations	A letter of representation has been requested from the Authority, which is included in the Audit Committee papers.
Confirmation requests from third parties	We requested from management permission to send confirmation requests to banking institutions and local authorities with whom the Authority has money on deposit. This permission was granted and the requests were sent. All requests were returned with positive confirmation.
Accounting practices	We have evaluated the appropriateness of the Authority's accounting policies, accounting estimates and financial statement disclosures. Our review found no material omissions in the financial statements, other than those mentioned in Appendix C - disclosure misstatements.
Audit evidence and explanations/ significant difficulties	All information and explanations requested from management was provided.

2. Financial Statements: other communication requirements



Our responsibility

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern” (ISA (UK) 570).

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Issue	Commentary
Going concern	<p>In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.</p> <p>Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:</p> <ul style="list-style-type: none">• the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the entity's services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and standardised approach for the consideration of going concern will often be appropriate for public sector entities• for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. Our consideration of the Authority's financial sustainability is addressed by our value for money work, which is covered elsewhere in this report. <p>Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the Authority meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:</p> <ul style="list-style-type: none">• the nature of the Authority and the environment in which it operates• the Authority's financial reporting framework• the Authority's system of internal control for identifying events or conditions relevant to going concern• management's going concern assessment. <p>On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:</p> <ul style="list-style-type: none">• a material uncertainty related to going concern has not been identified• management's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

2. Financial Statements - other responsibilities under the Code

Issue	Commentary
Other information	<p>We are required to give an opinion on whether the other information published together with the audited financial statements (including the Statement of Annual Governance Arrangements and Narrative Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.</p> <p>No inconsistencies have been identified. We plan to issue an unmodified opinion in this respect as reported at Appendix G.</p>
Matters on which we report by exception	<p>We are required to report on a number of matters by exception in a number of areas:</p> <ul style="list-style-type: none"> • if the Annual Governance Statement does not comply with disclosure requirements set out in CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit, • if we have applied any of our statutory powers or duties. • where we are not satisfied in respect of arrangements to secure value for money and have reported [a] significant weakness/es. <p>We have nothing to report on these matters.</p>
Specified procedures for Whole of Government Accounts	<p>We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions. Detailed work is not required as the Authority has not exceeded the NAO's thresholds.</p> <p>We will complete the Assurance Statement in line with the required deadlines.</p>
Certification of the closure of the audit	<p>We intend to delay the certification of the closure of the 2022/23 audit of Lancashire Combined Fire Authority in the audit report, as detailed in Appendix G, due to incomplete Value for Money work.</p>

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3. Value for Money arrangements (VFM)

Approach to Value for Money work for 2022/23

The National Audit Office issued its guidance for auditors in April 2020. The Code requires auditors to consider whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

When reporting on these arrangements, the Code requires auditors to structure their commentary on arrangements under the three specified reporting criteria.

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Improving economy, efficiency and effectiveness

Arrangements for improving the way the body delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



Financial Sustainability

Arrangements for ensuring the body can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3-5 years)



Governance

Arrangements for ensuring that the body makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the body makes decisions based on appropriate information

Potential types of recommendations

A range of different recommendations could be made following the completion of work on the body's arrangements to secure economy, efficiency and effectiveness in its use of resources, which are as follows:



Statutory recommendation

Written recommendations to the body under Section 24 (Schedule 7) of the Local Audit and Accountability Act 2014. A recommendation under schedule 7 requires the body to discuss and respond publicly to the report.



Key recommendation

The Code of Audit Practice requires that where auditors identify significant weaknesses in arrangements to secure value for money they should make recommendations setting out the actions that should be taken by the body. We have defined these recommendations as 'key recommendations'.



Improvement recommendation

These recommendations, if implemented should improve the arrangements in place at the body, but are not made as a result of identifying significant weaknesses in the body's arrangements

3. VFM: our procedures and conclusions

We have not yet completed all of our VFM work and so are not in a position to issue our Auditor's Annual Report. An audit letter explaining the reasons for the delay is attached in the Appendix H to this report. We expect to issue our Auditor's Annual Report to management by December 2023. This is in line with the National Audit Office's revised deadline, which requires the Auditor's Annual Report to be issued no more than three months after the date of the opinion on the financial statements.

As part of our work, we considered whether there were any risks of significant weakness in the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources. We did not identify any risks of significant weakness at the planning stage and have continued to monitor the Authority's finances, governance arrangements and performance monitoring during the audit for any indications of significant weaknesses in arrangements.

This work is underway and will be reported in our Auditors Annual Report.

4. Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. We have complied with the Financial Reporting Council's Ethical Standard and confirm that we, as a firm, and each covered person, are independent and are able to express an objective opinion on the financial statements

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged are detailed in Appendix E.

Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details see [Grant Thornton International Transparency report 2023](#).

4. Independence and ethics

As part of our assessment of our independence we note the following matters:

Matter	Conclusion
Relationships with Grant Thornton	We are not aware of any relationships between Grant Thornton and the Authority that may reasonably be thought to bear on our integrity, independence and objectivity
Relationships and Investments held by individuals	We have not identified any potential issues in respect of personal relationships with the Authority or investments in the Authority held by individuals
Employment of Grant Thornton staff	We are not aware of any former Grant Thornton partners or staff being employed, or holding discussions in respect of employment, by the Authority as a director or in a senior management role covering financial, accounting or control related areas.
Business relationships	We have not identified any business relationships between Grant Thornton and the Authority
Contingent fees in relation to non-audit services	No contingent fee arrangements are in place for non-audit services provided
Gifts and hospitality	We have not identified any gifts or hospitality provided to, or received from, a member of the Authority's board, senior management or staff that would exceed the threshold set in the Ethical Standard

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. The firm and each covered person [and network firms] have complied with the Financial Reporting Council's Ethical Standard and confirm that we are independent and are able to express an objective opinion on the financial statements

Following this consideration we can confirm that we are independent and are able to express an objective opinion on the financial statements. In making the above judgement, we have also been mindful of the quantum of non-audit fees compared to audit fees disclosed in the financial statements and estimated for the current year.

Appendices

- A. Communication of audit matters to those charged with governance
- B. Action plan – Audit of Financial Statements
- C. Follow up of prior year recommendations
- D. Audit Adjustments
- E. Fees and non-audit services
- F. Auditing developments
- G. Audit opinion
- H. Audit letter in respect of delayed VFM work

A. Communication of audit matters to those charged with governance

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks	•	
Confirmation of independence and objectivity	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant findings from the audit		•
Significant matters and issue arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud involving management and/or which results in material misstatement of the financial statements		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•
Expected modifications to the auditor's report, or emphasis of matter		•

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

This document, the Audit Findings, outlines those key issues, findings and other matters arising from the audit, which we consider should be communicated in writing rather than orally, together with an explanation as to how these have been resolved.

Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

Distribution of this Audit Findings report

Whilst we seek to ensure our audit findings are distributed to those individuals charged with governance, we are also required to distribute our findings to those members of senior management with significant operational and strategic responsibilities. We are grateful for your specific consideration and onward distribution of our report to all those charged with governance.

B. Action Plan – Audit of Financial Statements

We have identified 2 recommendations for the Authority as a result of issues identified during the course of our audit. We have agreed our recommendations with management, and we will report on progress on these recommendations during the course of the 2023/24 audit. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Assessment	Issue and risk	Recommendations
●	<p>Fixed asset register</p> <p>As part of our work testing the detail for individual assets held within the fixed asset register, we noted that 9 assets had negative net book values at 31 March 2023. This is due to depreciation being charged against the assets over and above the cost or value. The total excess depreciation was £190k. These assets in the FAR at a net nil book value total £587k.</p>	<p>We recommend the Authority examine the fixed asset register to ensure excess depreciation is not charged against fully depreciated assets and correct this for future years.</p> <p>Management response</p> <p>The assets with a negative net book value will be corrected during 2023/24 and new procedures will be put in place to ensure assets are not depreciated beyond their cost or value in the future.</p>
●	<p>Journal entry testing</p> <p>As part of our work testing the journals, we identified an issue with journals listing we obtained as it did not contain the complete information such as the preparer name and the name of person authorizing the journal.</p> <p>The system allows journals to be self authorized and we found this did occur in some cases. This is a control risk, although not uncommon in smaller finance teams. The Authority does have an additional review process to compensate for this control issue.</p>	<p>We recommend the Authority looks into whether the system can be updated to include details of preparer/authorizer.</p> <p>Management response</p> <p>A new process was implemented towards the end of 2022/23 to record the journal preparer and approver. The approval of journals is required by Accountants, or more senior members of the Finance Team, and this is required to be saved within the journal file. A journal register records the unique journal reference, accounting period, preparer, and approver. This is reviewed to minimise the risk of self-authorization on journal postings.</p>

Controls

- High – Significant effect on financial statements
- Medium – Limited Effect on financial statements
- Low – Best practice

C. Follow up of prior year recommendations

We identified the following issues in the audit of Lancashire Combined Authority's 2021/22 financial statements, which resulted in 1 recommendations being reported in our 2021/22 Audit Findings report.

We have followed up on the implementation of our recommendation and provide an update in the table.

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Assessment	Issue and risk previously communicated	Update on actions taken to address the issue
✓	<p>Password security – Oracle database</p> <p>We identified a weakness in Oracle password configuration. The password length is set to 6 characters and does not include a minimum password length of 8 character as per leading practices.</p> <p>We recommended password security access to the Oracle database is set to a minimum 8-character length to help prevent unauthorized access to the system.</p>	<p>The finance system used in 2021/22 was upgraded to Oracle Fusion during 2022/23.</p> <p>We are currently completing our work to examine the underlying controls within the newly implemented system.</p> <p>Our IT team are currently assessing the process and controls that were in place in relation to the data transfer. We will report further on completion of their work in this area.</p> <p>Management response:</p> <p>The password length for Oracle Fusion is a minimum of 16 characters and therefore meets the minimum length of eight characters recommended by leading practices.</p>

Assessment

- ✓ Action completed
- X Not yet addressed

D. Audit Adjustments

Impact of adjusted misstatements

All adjusted misstatements are set out in detail below along with the impact on the key statements and the reported net expenditure for the year ending 31 March 2023.

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

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Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Impact on total net expenditure £'000	Impact on general fund £'000
Other long term liabilities				
Pension asset and liability for different schemes shown separately.				
Pension asset (long term)		Dr 19,877		
Pension liability (long term)		Cr 19,877		
Creditors				
Debtor balances netted from creditors shown gross				
Creditors		Cr 95		
Debtors		Dr 95		
Overall impact	TBC	TBC	TBC	TBC

D. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

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Misclassification and disclosure changes

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

Disclosure/issue/Omission	Detail	Adjusted?
Narrative Report	The Authority made some updates to the details within the Narrative Report to ensure this was consistent with other entries in the financial statements.	✓
Note to the Expenditure and Funding Analysis (note 1a)	The Authority updated the totals in the comparative 2021/22 table which were incorrect.	✓
Employees emoluments and Senior officers remuneration (note 3)	The Authority corrected some compilation errors in the tables to reflect: <ul style="list-style-type: none"> a reduction in total employee emoluments bandings for 2022/23 to 147 (previously 148) changes in the pension contributions and total remuneration in the 2021/22 comparative table for 2 Directors. 	✓
Property, plant and equipment movements (note 6) Capital expenditure analysis.	The Authority amended the details within the capital expenditure analysis 2022/23 for Intangible assets and revenue contributions to capital to make these consistent with other entries in the financial statements.	✓
Property, plant and equipment movements (note 6) Revaluations	The Authority have expanded the disclosure in Note 6 to show the schedule of revaluations over the rolling 5 year cycle in line with the requirements of the Code.	✓
Assets and Liabilities in Relation to Post-employment Benefits (note 15)	The Authority corrected a transposition error for the Gain/(Loss) on financial assumptions from a negative value to a positive one (£295,950k) .	✓

D. Audit Adjustments (continued)

Impact of unadjusted misstatements

At this point the issue regarding RAAC set out on page 10 is unadjusted. Our work in this areas remains ongoing.

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Impact on total net expenditure £'000	Impact on general fund £'000	Reason for not adjusting
PPE					
Negative depreciation	Cr 190	Dr 190	Cr 190		TBC
PPE					
Assets at Nil NBV		Dr587 Cr 587			TBC
Overall impact	TBC	TBC	TBC	TBC	



D. Audit Adjustments (continued)

Impact of prior year unadjusted misstatements

The table below provides details of adjustments identified during the prior year audit which had not been made within the final set of 2021/22 financial statements

Detail	Comprehensive Income and Expenditure Statement £'000	Statement of Financial Position £' 000	Impact on total net expenditure £'000	Impact on general fund £'000	Reason for not adjusting
Creditor Provisions	0	Decrease 550 Increase 550	0	0	Not material
<p>The Authority included a creditor for ongoing pensionable allowance claims. These first arose in 2019/20 and are still subject to legal challenge and for which the outcome is uncertain.</p> <p>We recognise the prudence of including these but as the outcome is uncertain they should be held as a provision, rather than a creditor.</p>					
Overall impact	£0	£0	£0	£0	



E. Fees

We confirm below our final fees charged for the audit and confirm there were no fees for the provision of non audit services.

Audit fees	Proposed fee	Final fee
Scale fee published by PSAA 2022/23	£29,295	£29,295
<i>Issues not included in the above</i>		
Additional work on Value for Money (VfM) under new NAO Code	£8,000	£8,000
Increased audit requirements of revised ISA 540	£1,800	£1,800
Enhanced audit procedures on journals testing (not included in the scale Fee)	£2,000	£2,000
Enhanced audit procedures for Payroll – Change of circumstances	£500	£500
Local risk factors – general ledger	£200	TBC
Increased audit requirements of revised ISA 315	£2,000	£2,000
Total audit fees 2022/23 (excluding VAT)	£43,795	TBC

The fees reconcile to Note 4 of the financial statements.

This covers all services provided by us and our network to the Authority, its directors and senior management and its affiliates, and other services provided to other known connected parties that may reasonably be thought to bear on our integrity, objectivity or independence. (The FRC Ethical Standard (ES 1.69))

F. Auditing developments

Revised ISAs

There are changes to the following ISA (UK):

ISA (UK) 315 (Revised July 2020) 'Identifying and Assessing the Risks of Material Misstatement'

This impacts audits of financial statement for periods commencing on or after 15 December 2021.

ISA (UK) 220 (Revised July 2021) 'Quality Management for an Audit of Financial Statements'

ISA (UK) 240 (Revised May 2021) 'The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements'

A summary of the impact of the key changes on various aspects of the audit is included below:

These changes will impact audit for audits of financial statement for periods commencing on or after 15 December 2022.

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Area of change	Impact of changes
Risk assessment	The nature, timing and extent of audit procedures performed in support of the audit opinion may change due to clarification of: <ul style="list-style-type: none"> the risk assessment process, which provides the basis for the assessment of the risks of material misstatement and the design of audit procedures the identification and extent of work effort needed for indirect and direct controls in the system of internal control the controls for which design and implementation needs to be assess and how that impacts sampling the considerations for using automated tools and techniques.
Direction, supervision and review of the engagement	Greater responsibilities, audit procedures and actions are assigned directly to the engagement partner, resulting in increased involvement in the performance and review of audit procedures.
Professional scepticism	The design, nature, timing and extent of audit procedures performed in support of the audit opinion may change due to: <ul style="list-style-type: none"> increased emphasis on the exercise of professional judgement and professional scepticism an equal focus on both corroborative and contradictory information obtained and used in generating audit evidence increased guidance on management and auditor bias additional focus on the authenticity of information used as audit evidence a focus on response to inquiries that appear implausible
Definition of engagement team	The definition of engagement team when applied in a group audit, will include both the group auditors and the component auditors. The implications of this will become clearer when the auditing standard governing special considerations for group audits is finalised. In the interim, the expectation is that this will extend a number of requirements in the standard directed at the 'engagement team' to component auditors in addition to the group auditor. <ul style="list-style-type: none"> Consideration is also being given to the potential impacts on confidentiality and independence.
Fraud	The design, nature timing and extent of audit procedures performed in support of the audit opinion may change due to: <ul style="list-style-type: none"> clarification of the requirements relating to understanding fraud risk factors additional communications with management or those charged with governance
Documentation	The amendments to these auditing standards will also result in additional documentation requirements to demonstrate how these requirements have been addressed.

G. Audit opinion - DRAFT

Our audit opinion is included below. We anticipate we will provide the Authority with an unmodified audit report.

Independent auditor's report to the members of Lancashire Combined Fire Authority

Report on the Audit of the Financial Statements

Opinion on financial statements

We have audited the financial statements of Lancashire Combined Fire Authority (the 'Authority') for the year ended 31 March 2023, which comprise the Comprehensive Income and Expenditure Statement, the Movement in Reserves Statement, the Balance Sheet, the Cash Flow Statement, and notes to the financial statements, including a summary of significant accounting policies and include the firefighters' pension fund financial statements, comprising the Fund Account, the Net Assets Statement and notes to the financial statements. The notes to the financial statements include notes to the core financial statements and firefighters pension fund notes. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the Authority as at 31 March 2023 and of its expenditure and income for the year then ended;
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We are responsible for concluding on the appropriateness of the Treasurer's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Authority's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Authority to cease to continue as a going concern.

In our evaluation of the Treasurer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 that the Authority's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services provided by the Authority. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2022) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Authority and the Authority's disclosures over the going concern period.

In auditing the financial statements, we have concluded that the Treasurer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Authority's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Treasurer with respect to going concern are described in the relevant sections of this report.

G. Audit opinion

Other information

The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. The Treasurer is responsible for the other information. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Other information we are required to report on by exception under the Code of Audit Practice

Under the Code of Audit Practice published by the National Audit Office in April 2020 on behalf of the Comptroller and Auditor General (the Code of Audit Practice) we are required to consider whether the Statement on Annual Governance Arrangements does not comply with 'Delivering Good Governance in Local Government Framework 2016 Edition' published by CIPFA and SOLACE, or is misleading or inconsistent with the information of which we are aware from our audit. We are not required to consider whether the Statement on Annual Governance Arrangements addresses all risks and controls or that risks are satisfactorily addressed by internal controls.

We have nothing to report in this regard.

Opinion on other matters required by the Code of Audit Practice

In our opinion, based on the work undertaken in the course of the audit of the financial statements, the other information published together with the financial statements in the Statement of Accounts for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we are required to report by exception

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

Responsibilities of the Authority and the Treasurer

As explained more fully in the Statement of Responsibilities set out on page 15, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Treasurer. The Treasurer is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23, for being satisfied that they give a true and fair view, and for such internal control as the Treasurer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Treasurer is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless they have been informed by the relevant national body of the intention to dissolve the Authority without the transfer of its services to another public sector entity.

G. Audit opinion

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. Irregularities, including fraud, are instances of non-compliance with laws and regulations. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Authority and determined that the most significant which are directly relevant to specific assertions in the financial statements are those related to the reporting frameworks (the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23, the Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015, the Local Government Act 2003, and the Fire and Rescue Services Act 2004). We also identified the following additional regulatory frameworks in respect of the firefighters' pension fund, the Public Service Pensions Act 2013, the Firefighters' Pension Scheme (England) Regulations 2014 and the Firefighters' Pension Scheme (England) Order 2006

We enquired of management and the Audit Committee, concerning the Authority's policies and procedures relating to:

- the identification, evaluation and compliance with laws and regulations;
- the detection and response to the risks of fraud; and
- the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.

We enquired of management, internal audit and the Audit Committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.

We assessed the susceptibility of the Authority's financial statements to material misstatement, including how fraud might occur, by evaluating management's incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to:

- large and unusual journal entries; and
- accounting estimates and critical judgements made by management.

Our audit procedures involved:

- evaluation of the design effectiveness of controls that management has in place to prevent and detect fraud,
- journal entry testing, with a focus on large and unusual journals
- challenging assumptions and judgements made by management in its significant accounting estimates in respect of land and buildings and the defined pension fund net liability valuations, and
- assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.

These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.

- we communicated relevant laws and regulations and potential fraud risks to all engagement team members, including the potential for fraud in revenue and expenditure recognition, and the significant accounting estimates related to land and buildings and the defined pension fund net liability valuations.
- we remained alert to any indications of non-compliance with laws and regulations, including fraud, throughout the audit.

G. Audit opinion

Our assessment of the appropriateness of the collective competence and capabilities of the engagement team included consideration of the engagement team's:

- understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation
- knowledge of the local government sector
- understanding of the legal and regulatory requirements specific to the Authority including:
 - the provisions of the applicable legislation
 - guidance issued by CIPFA/LASAAC and SOLACE
 - the applicable statutory provisions.

In assessing the potential risks of material misstatement, we obtained an understanding of:

- the Authority's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
- the Authority's control environment, including the policies and procedures implemented by the Authority to ensure compliance with the requirements of the financial reporting framework.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Report on other legal and regulatory requirements – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources

Matter on which we are required to report by exception – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources

Under the Code of Audit Practice, we are required to report to you if, in our opinion, we have not been able to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2023.

Our work on the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources is not yet complete. The outcome of our work will be reported in our commentary on the Authority's arrangements in our Auditor's Annual Report. If we identify any significant weaknesses in these arrangements, these will be reported by exception in a further auditor's report. We are satisfied that this work does not have a material effect on our opinion on the financial statements for the year ended 31 March 2023.

Responsibilities of the Authority

The Authority is responsible for putting in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Auditor's responsibilities for the review of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to be satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

We undertake our review in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in January 2023. This guidance sets out the arrangements that fall within the scope of 'proper arrangements'. When reporting on these arrangements, the Code of Audit Practice requires auditors to structure their commentary on arrangements under three specified reporting criteria:

- Financial sustainability: how the Authority plans and manages its resources to ensure it can continue to deliver its services;
- Governance: how the Authority ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness: how the Authority uses information about its costs and performance to improve the way it manages and delivers its services.

We document our understanding of the arrangements the Authority has in place for each of these three specified reporting criteria, gathering sufficient evidence to support our risk assessment and commentary in our Auditor's Annual Report. In undertaking our work, we consider whether there is evidence to suggest that there are significant weaknesses in arrangements.

G. Audit opinion

Report on other legal and regulatory requirements – Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate for Lancashire Combined Fire Authority for the year ended 31 March 2023 in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice until we have completed:

- our work on the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources
- the work necessary to issue our Whole of Government Accounts (WGA) Component Assurance statement for the Authority for the year ended 31 March 2023.

We are satisfied that this work does not have a material effect on the financial statements for the year ended 31 March 2023.

Use of our report

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 [and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited]. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Signature:

Georgia Jones, Key Audit Partner

for and on behalf of Grant Thornton UK LLP, Local Auditor

Liverpool

Date:

H. Audit letter in respect of delayed VFM work

Councillor John Shedwick
Chair of Audit Committee

17 November 2023

Dear Councillor Shedwick

Delayed Value for Money reporting

The original expectation under the approach to VFM arrangements work set out in the 2020 Code of Audit Practice was that auditors would follow an annual cycle of work, with more timely reporting on VFM arrangements, including issuing their commentary on VFM arrangements for local government by 30 September each year at the latest.

Unfortunately, due to the on-going challenges impacting on the local audit market, including the need to meet regulatory and other professional requirements, we have been unable to complete our work as quickly as would normally be expected. The National Audit Office has updated its guidance to auditors to allow us to postpone completion of our work on arrangements to secure value for money and focus our resources firstly on the delivery of our opinions on the financial statements. This is intended to help ensure as many as possible can be issued in line with national timetables and legislation.

As a result, we have therefore not yet issued our Auditor's Annual Report, including our commentary on arrangements to secure value for money. We now expect to publish our report no later than 31 December 2023.

For the purposes of compliance with the 2020 Code, this letter constitutes the required audit letter explaining the reasons for delay.

Yours faithfully

Georgia Jones
Director

Lancashire Combined Fire Authority Audit Committee

Meeting to be held on 28 November 2023

External Audit – Letter of Representation (Appendix 1 refers)

Contact for further information:

Steven Brown - Director of Corporate Services – Telephone Number 01772 826804

Executive Summary

As part of the year-end process the Authority is required to sign a letter of representation on completion of the audit. This letter confirms that the Authority has disclosed all relevant information in its accounts for the year in question and that all issues which should have been brought to the attention of the auditors have been.

Recommendation

The Committee is asked to authorise the signing of the letter by the Chair of the Audit Committee on completion of the audit.

Information

The letter of representation is attached as Appendix 1 and this requires signing by the Treasurer and Chair of the Audit Committee to confirm that there are no issues that should have been brought to the attention of the auditors, but which have not been.

Note that there is an additional representation included this year in relation to Reinforced Autoclaved Aerated Concrete (RAAC); that we have identified one building which we have highlighted to the auditor and confirm we are not aware of any other property in the Authority's portfolio that is impacted by this issue.

The Treasurer has confirmed that he will sign the letter when there are no further issues that require disclosure following any further matters determined from the work by the auditors.

Financial Implications

None.

Business Risk Implications

None

Environmental Impact

None

Equality and Diversity Implications

None

Human Resource Implications

None

**Local Government (Access to Information) Act 1985
List of Background Papers**

Paper:

Date:

Contact:

Reason for inclusion in Part 2 if appropriate: N/A

[LETTER TO BE WRITTEN ON CLIENT HEADED PAPER]

Grant Thornton UK LLP
Royal Liver Building
Liverpool
L3 1PS

[Date] – {TO BE DATED SAME DATE AS DATE OF AUDIT OPINION}

Dear Grant Thornton UK LLP

Lancashire Combined Fire Authority
Financial Statements for the year ended 31 March 2023

This representation letter is provided in connection with the audit of the financial statements of Lancashire Combined Fire Authority for the year ended 31 March 2023 for the purpose of expressing an opinion as to whether the Authority financial statements give a true and fair view in accordance with International Financial Reporting Standards, and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 and applicable law.

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

Financial Statements

- i. We have fulfilled our responsibilities for the preparation of the Authority's financial statements in accordance with International Financial Reporting Standards and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 ("the Code"); in particular, the financial statements are fairly presented in accordance therewith.
- ii. We have complied with the requirements of all statutory directions affecting the Authority and these matters have been appropriately reflected and disclosed in the financial statements.
- iii. The Authority has complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance. There has been no non-compliance with requirements of any regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.
- iv. We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
- v. Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable. Such accounting estimates include [...]. We are satisfied that the material judgements used in the preparation of the financial statements are soundly based, in accordance with the Code and adequately disclosed in the financial statements. We understand

our responsibilities includes identifying and considering alternative, methods, assumptions, or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the estimate used. We are satisfied that the methods, the data, and the significant assumptions used by us in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in accordance with the Code and adequately disclosed in the financial statements.

- vi. We confirm that we are satisfied that the actuarial assumptions underlying the valuation of pension scheme assets and liabilities for IAS19 Employee Benefits disclosures are consistent with our knowledge. We confirm that all settlements and curtailments have been identified and properly accounted for. We also confirm that all significant post-employment benefits have been identified and properly accounted for.
- vii. Except as disclosed in the financial statements:
 - a. there are no unrecorded liabilities, actual or contingent
 - b. none of the assets of the Authority has been assigned, pledged or mortgaged
 - c. there are no material prior year charges or credits, nor exceptional or non-recurring items requiring separate disclosure.
- viii. Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards and the Code.
- ix. All events subsequent to the date of the financial statements and for which International Financial Reporting Standards and the Code require adjustment or disclosure have been adjusted or disclosed.
- x. We have considered the adjusted misstatements, and misclassification and disclosures changes schedules included in your Audit Findings Report. The Authority's financial statements have been amended for these misstatements, misclassifications and disclosure changes and are free of material misstatements, including omissions.
- xi. We have considered the unadjusted misstatements schedule included in your Audit Findings Report. We have not adjusted the financial statements for these misstatements brought to our attention as *[they are immaterial to the results of the Authority and its financial position at the year-end OR list reasons]*. The financial statements are free of material misstatements, including omissions.
- xii. Actual or possible litigation and claims have been accounted for and disclosed in accordance with the requirements of International Financial Reporting Standards.
- xiii. We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements.
- xiv. We have updated our going concern assessment. We continue to believe that the Authority's financial statements should be prepared on a going concern basis and have not identified any material uncertainties related to going concern on the grounds that:

- a. the nature of the Authority means that, notwithstanding any intention to cease its operations in their current form, it will continue to be appropriate to adopt the going concern basis of accounting because, in such an event, services it performs can be expected to continue to be delivered by related public authorities and preparing the financial statements on a going concern basis will still provide a faithful representation of the items in the financial statements
- b. the financial reporting framework permits the entry to prepare its financial statements on the basis of the presumption set out under a) above; and
- c. the Authority's system of internal control has not identified any events or conditions relevant to going concern.

We believe that no further disclosures relating to the Authority's ability to continue as a going concern need to be made in the financial statements.

- xv. The Authority has complied with all aspects of ring-fenced grants that could have a material effect on the Authority's financial statements in the event of non-compliance.
- xvi. We have assessed our property and estates for any potential instances of reinforced autoclaved aerated concrete (RAAC). We have identified one building which we have highlighted to the auditor. We confirm we are not aware of any other property in the Authority's portfolio that is impacted by this issue. We confirm the values of property in the financial statements remain appropriate and are not subject to impairment.

Information Provided

- xvii. We have provided you with:
 - a. access to all information of which we are aware that is relevant to the preparation of the Authority's financial statements such as records, documentation, and other matters;
 - b. additional information that you have requested from us for the purpose of your audit; and
 - c. access to persons within the Authority via remote arrangements from whom you determined it necessary to obtain audit evidence.
- xviii. We have communicated to you all deficiencies in internal control of which management is aware.
- xix. All transactions have been recorded in the accounting records and are reflected in the financial statements.
- xx. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- xxi. We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the Authority and involves:
 - a. management;

- b. employees who have significant roles in internal control; or
 - c. others where the fraud could have a material effect on the financial statements.
- xxii. We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements communicated by employees, former employees, analysts, regulators, or others.
 - xxiii. We have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.
 - xxiv. We have disclosed to you the identity of the Authority's related parties and all the related party relationships and transactions of which we are aware.
 - xxv. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

Annual Governance Statement

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

Narrative Report

- xxvii. The disclosures within the Narrative Report fairly reflect our understanding of the Authority's financial and operating performance over the period covered by the Authority's financial statements.

Approval

The approval of this letter of representation was minuted by the Authority's Audit Committee at its meeting on 28 November 2023.

Yours faithfully

Name.....

Position.....

Date.....

Name.....

Position.....

Date.....

Signed on behalf of the Authority

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Lancashire Combined Fire Authority Audit Committee

Meeting to be held on 28 November 2023

External Audit Fees (Appendices 1 and 2 refer)

Contact for further information:

Steven Brown - Director of Corporate Services – Telephone Number 01772 826804

Executive Summary

This report updates Committee Members of the proposed audit fees from 2023/24 advised by Public Sector Audit Appointments Ltd following the appointment process reported to the CFA in December 2021.

Recommendation

The Committee is asked to note the proposed 2023/24 audit fees and response to the consultation.

Information

The CFA accepted the Public Sector Audit Appointments invitation to opt-in to the national scheme in December 2021. Following a process our auditors Grant Thornton were appointed for a further five years from 2023/24. The procurement took place against the challenging backdrop of a troubled audit profession, a turbulent market and a local audit system that is facing unprecedented difficulties including large volumes of delayed audit opinions.

The Committee was advised that in Autumn 2023 the Public Sector Audit Appointments Ltd (PSAA) will consult on the proposed scale of audit fees payable by bodies in respect of the audit of 2023/24 accounts and to expect increases of the order of 150% on the total fees for 2022/23.

Audit requirements have increased in recent years as a result of increased regulatory challenge, changes to the audit work required under the Code of Audit Practice and updated auditing and financial reporting standards. On the 19th September the Chief Executive of the PSAA advised the Authority of our proposed fee for 2023/24 of £92,606; representing a 151% increase (See Appendix 1). Alongside this the PSAA launched a consultation on the fee scales which we responded to (See Appendix 2).

This consultation on the 2023/24 fee scale is taking place at a time of change in the local audit system. The audit profession has been subject to high levels of scrutiny in recent years following several widely reported financial failures in the private sector and increase in reported Section 114 notices across the sector.

The financial pressure will be included in the 2024/25 budget report to the Authority in February 2024.

Financial Implications

Set out in the report.

Business Risk Implications

None

Environmental Impact

None

Equality and Diversity Implications

None

Human Resource Implications

None

Local Government (Access to Information) Act 1985 List of Background Papers

Paper:

Date:

Contact:

Reason for inclusion in Part 2 if appropriate: N/A

Prepared on 19 September 2023

2023/24 scale fee for Lancashire Combined Fire Authority

PSAA has recently launched its [consultation on the fee scale for 2023/24 audits](#).

Our aim is to update your scale fee to ensure it reflects current audit requirements. This updating is particularly important for the 2023/24 fee scale to ensure fees are set on a consistent and equitable basis at the start of the new contract period. This means that the scale fee for each opted-in body better reflects the audit work required under the current Code of Audit Practice published by the National Audit Office and the regulatory expectations of the Financial Reporting Council. Updating the fee scale in this way will have the benefit of making expected fees clearer for opted-in bodies much earlier in the audit cycle and reducing the volume of fee variations.

We propose setting your 2023/24 scale fee based on the elements set out in Table 1 below. Table 2 provides more detail. Further explanation of each of the elements is provided in the consultation on the fee scale for 2023/24 audits.

Table 1: Summary of your proposed 2023/24 scale fee

Fee scale elements	
1) 2022/23 scale fee	£29,295
2) Add: approved fee variations or estimates for recurring work not already included (see Table 2 for details)	£600
3) Add: changes in audit requirements (VFM arrangements, ISA 540)	£7,000
4) Add: adjustment for special circumstances (where applicable)	£0
Subtotal 2022/23 scale fees plus recurring fees	£36,895
5) Audit fee adjustment to reflect the procurement outcome (uplift by 151%)	£55,711
Scale fee for 2023/24	£92,606

PSAA is required under the local audit regulations to consult on and set the 2023/24 fee scale by 1 December 2023. We cannot change your scale fee after that date. Any further changes in the work the auditor needs to undertake on your audit will therefore need to be determined using the fee variations process, and if the increase or decrease in the work is recurring the change will be considered for consolidation in the next fee scale.

We are setting the 2023/24 fee scale at a time of change in the local audit system. In July 2023 the Department for Levelling Up, Housing and Communities (DLUHC) announced proposals to address the audit backlog and is working with all stakeholders to tackle the complex issues involved. The proposals include the possibility of a time-limited revision to the Code of Audit Practice, which may reduce the amount of audit work needed while the backlogs are resolved. The proposals are still under consideration and any changes affecting fees are still to be confirmed, so we cannot reflect them in the proposed fee scale. We are therefore consulting on the basis of existing audit requirements. We will need to assess the impact on audit fees if changes are confirmed, and at that point we will write to opted-in bodies to set out how we will update fees.

Table 2 below sets out the proposed aggregate recurring value for consolidation into your 2023/24 scale fee in column A. Some of these recurring values may already have been consolidated into your 2022/23 scale audit fee. Where this is the case, relevant figures are shown in column B. The balance of any recurring value (A minus B) which has not yet been consolidated is shown in column C. These are the additional fees which we propose to incorporate into your 2023/24 scale fee.

The proposed values in Table 2 are based on fee variations approved to date for your audit over the four audit years 2018/19-2021/22 (left-hand side of table 2). Where fee variations are yet to be determined, either for particular categories or overall, we have used estimates based on averages for your authority type. The figures in Table 2 may not reconcile directly to the fee variation statements we have sent you previously for approved fee variations because:

- we have reviewed each fee variation to identify the recurring element specifically, as sometimes fee variations can be a combination of recurring and non-recurring work; and
- we have considered the applicability of each category to each opted-in body to ensure we are consolidating the proposed additional fees consistently and equitably where we would expect the auditor would need to undertake additional work.

Further fee variations may be needed during the course of the 2023/24 audit. For example, our research has concluded that it is premature at this stage to consolidate additional fees for some changes in audit requirements such as ISA 315 and ISA 240. The recurring elements of any further fee variations approved will be considered in future fee scale consultations.

Table 2: Summary of recurring figures for consolidation into 2023/24 scale fees

Fee variation area of work	Proposed aggregate recurring value for consolidation into 2023/24 scale fees	Already consolidated into 2022/23 scale fees	Recurring value for consolidation into 2023/24 scale fees
	A	B	A-B=C
Group accounts – note 1	£0	£0	£0
Pension valuation	£2,188	£2,188	£0
PIE	£0	£0	£0
PPE valuation	£2,188	£2,188	£0
Increased FRC Challenge	£1,850	£1,250	£600
PFI – note 2	£0	£0	£0
Other – note 3	£0	£0	£0
VFM commentary	£5,500	£0	£5,500
ISA540	£1,500	£0	£1,500
IAS19 – note 4	£0	£0	£0
Major local audits	£0	£0	£0
Investment valuations – note 5	£0	£0	£0
Total	£13,226	£5,626	£7,600

Notes

1. **Group accounts:** in some cases, for example bodies with long-standing group accounts requirements, if we have not previously consolidated a fee variation into the scale fee but are aware that work on group accounts will be required, we have updated the proposed 2023/24 scale fee accordingly.
2. **PFI:** while most PFI schemes are long-standing, an incoming audit firm will not be familiar with the details of each scheme and will need to do additional work to understand the scheme and model. The additional work will therefore require a fee variation.
3. **Other:** we have included additional amounts where the body has experienced significant changes in size or complexity or other factors. We propose making a temporary scale fee adjustment, but subject to detailed review after the first audit year to compare to the actual outcome. We will then determine if the adjustment is correct or requires further refinement for subsequent years.
4. **IAS19:** applies to pension fund audits only and reflects the expectation in NAO auditor guidance that auditors of pension funds should provide IAS 19 assurances under the scope of the Code of Audit Practice to auditors of admitted bodies that are relevant local audit bodies. We propose including an additional fee for this work in the 2023/24 scale fee for each pension fund audit, calculated based on the number of assurances expected for local audit bodies in the local government sector. This work was previously outside the Code, so although additional fees are likely to have been charged these may have been reported differently by the auditors.
5. **Investment valuations:** applies to pension fund audits / pension authorities only and relates to the additional work/testing auditors are doing in response to clarification of regulatory expectations. This includes auditors demonstrating that they have heightened their challenge of management’s assumptions/assessments and have a greater depth to their assurance about the source of evidence.

Response to PSAA Consultation questions

The Public Sector Audit Appointment Authority (PSAA) has recently launched its consultation on the fee scale for the 2023/24 audits (note these largely relate to audit fees payable in 2024/25 for the audit of the 2023/24 accounts). As the table shows this results in an increase of c150% for all authorities. Following a procurement exercise the fees have been released for each authority, for the CFA the fee is set out below:

Fee scale elements	
1) 2022/23 scale fee	£29,295
2) Add: approved fee variations or estimates for recurring work not already included (see Table 2 for details)	£600
3) Add: changes in audit requirements (VFM arrangements, ISA 540)	£7,000
4) Add: adjustment for special circumstances (where applicable)	£0
Subtotal 2022/23 scale fees plus recurring fees	£36,895
5) Audit fee adjustment to reflect the procurement outcome (uplift by 151%)	£55,711
Scale fee for 2023/24	£92,606

The PSAA have asked a small number of questions of which the key questions and responses are proposed below:

3. Do you support the proposals in the consultation for the fee scale for 2023/24 audits?

No. Whilst the increase in audit fees of c150% is not unexpected given PSAA's announcement in October 2022, it does represent a significant funding challenge for Lancashire Fire Authority that is already facing a range of financial pressures including significant increases in utility costs, diesel, green book costs, maintenance costs, insurance costs etc.

We feel radical change to the local audit system is clearly needed urgently. The level of work required for the current reporting and disclosure obligations on account preparers, which then require audit and oversight, is not proportionate to their value to the user of the accounts, given the potential financial or governance risks are relatively low. Our ask of Government, the PSAA and other bodies is to work together to change the regime and deliver 'a more proportionate audit' that helps public bodies, delivers better results for users of the accounts, and should also encourage competition in the sector which would ultimately reduce unnecessary costs.

Without urgent regime changes or specific new burdens funding we cannot support these increases. Fire authorities will have to make difficult decisions if cost increases are not avoided or funded, and that may result in a reduction in front line wholtime and on call firefighters with the removal of fire engines and a resultant degradation in service with an increase in response times and risk; and a reduction in those carrying out importance prevention and building safety work.

4. Do you agree with the proposed elements of the 2023/24 fee scale?

Yes, the elements of the fee are not challenged it is the quantum of the procurement outcome.

5. Are there other factors you think should be reflected in the 2023/24 fee scale?

No

6. Any other comments you would like to make?

No, see question 3.

Lancashire Combined Fire Authority Audit Committee

Meeting to be held on 28 November 2023

Internal Audit Monitoring Report (Appendix 1 refers)

Contact for further information:

Steven Brown - Director of Corporate Services – Telephone Number 01772 826804

Executive Summary

The attached report sets out the current position in respect of the internal audit plan for 2023/24.

Decision Required

The Committee is asked to note/endorse the report.

Information

The internal auditors produce a summary of progress against the annual plan for each Audit Committee meeting, setting out progress to date and any significant findings. The report is attached as Appendix 1 and will be presented by the Head of Internal Audit.

Financial Implications

None

Business Risk Implications

None

Environmental Impact

None

Equality and Diversity Implications

None

Human Resource Implications

None

Local Government (Access to Information) Act 1985
List of Background Papers

Paper:

Date:

Contact:

Reason for inclusion in Part 2 if appropriate: N/A

Lancashire Combined Fire Authority

**Internal Audit Service monitoring report: period ended
13 November 2023**

1 Purpose of this report

- 1.1 The Internal Audit Plan for 2023/24 was approved by the Audit Committee in March 2023. This report details the progress to date in undertaking the agreed coverage.

2 Internal audit work undertaken

- 2.1 Work carried out during the period 1 April 2023 to 11 November 2023 was in accordance with the agreed audit plan. To date, 22 days have been spent this financial year on completion of the 2023/24 plan, equating to 28% of the total planned audit activity of 80 days. The table below shows the current status of all audit work.
- 2.2 No areas of concern have come to our attention in conducting our assurance work to date that requires bringing to the attention of committee members.


Audit review	Audit days			Status	Assurance Opinion
	Planned	Actual	Variation		
Governance and business effectiveness					
Overall governance, risk management and control arrangements	3	1	2	Ongoing This is ongoing by the Audit Manager within the year.	
Service delivery and support					
Equality Impact Assessments	10	9	1	Draft Report shared with client	N/A
Management of change within LFRS	10	9	1	Final	● Substantial
District Planning Activity	10	0.5	9.5	Progressing: Scope agreed and testing started	N/A

Business processes					
Accounts payable	9	0	9	Not started	N/A
Accounts receivable	6	0	6	Not started	N/A
General ledger	6	0	6	Not started	N/A
HR/ Payroll	10	0	10	Progressing: Scope agreed and detailed testing starting end of November	N/A
Treasury management	4	0	4	Not started	N/A
Follow up audit activity					
Follow up activity	2	0	2	Not started There is only KFS actions which will be picked up in the main KFS audit.	N/A
Other components of the audit plan					
Management activity	9	2.5	6.5	Ongoing: This is ongoing by the Audit Manager within the year.	
National Fraud Initiative	1	0	1		
Total	80	22	58		

3 Extracts from Audit Reports

3.1 Extracts of assurance summaries are shown below

Management of Change within LFRS

Overall assurance rating	Audit findings requiring action			
 Substantial	Extreme	High	Medium	Low
	0	0	0	0

See Appendix A for Rating Definitions

Overall, we can provide **substantial** assurance on the adequacy & effectiveness of the management of the change process within Lancashire Fire and Rescue Service (LFRS), and how they measure benefits realised for the projects and programmes that have been implemented.

Service Order Administration 130 – Project Management lays out the governance structure and the roles and responsibilities for those individuals who will be involved in the implementation of the project. Additionally, LFRS has developed a new guidance document which is intended to be used as a step-by-step guide for project managers and those who may be new to the role. All the staff within the Corporate Planning and Programmes team have completed the Prince 2 foundation and practitioners training. Historically, staff who could take on the role of Project Manager were all offered Prince 2 foundation training. However, due to unforeseen circumstances the courses have not been undertaken for newly promoted or appointed staff for a few years. To address this the Corporate Policy and Programmes Manager is currently in the process of reviewing a one-day training course through the Knowledge Academy. The course is expected to be implemented before the end of the calendar year.

Approvals and authorisation of the initial go ahead of the project and other subsequent approvals or authorisations that may be required whilst the project is on-going is through the Executive Board or Corporate Programme Board. Once the project has started, the operation and the implementation of the project is managed through regular project meetings, checkpoint reporting and health reports, which are then reported to the Programme Board as well as the Corporate Programme Board. The Corporate Policy and Programme Manager has populated a draft evaluation framework which is currently out for internal consultation. Many projects do complete some form of evaluation, but this will provide some consistency in approach going forward. Benefits realised analysis would be picked up in both the closure report and the post implementation review report.

LFRS was inspected by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Service in July 2022 in relation to the service's effectiveness, efficiency and people. The report congratulated LFRS in its excellent performance in keeping people safe and secure from fires and other risks. The report also highlighted and complimented the implementation of the changes that the service has made since the last inspection, providing Internal Audit with assurance of the effectiveness of how the service identifies changes and implements them. The report considered several areas and LFRS received "Good" in all aspects that were reviewed, however there were two "areas of improvement" which if implemented would also benefit the "management of change" process. The evaluation draft framework mentioned above contributes to addressing these two actions.

Audit assurance levels and residual risks

Appendix A

Note that our assurance may address the adequacy of the control framework's design, the effectiveness of the controls in operation, or both. The wording below addresses all of these options and we will refer in our reports to the assurance applicable to the scope of the work we have undertaken.

- **Substantial assurance:** the framework of control is adequately designed and/ or effectively operated overall.
- **Moderate assurance:** the framework of control is adequately designed and/ or effectively operated overall, but some action is required to enhance aspects of it and/ or ensure that it is effectively operated throughout.
- **Limited assurance:** there are some significant weaknesses in the design and/ or operation of the framework of control that put the achievement of its objectives at risk.
- **No assurance:** there are some fundamental weaknesses in the design and/ or operation of the framework of control that could result in failure to achieve its objectives.

Classification of residual risks requiring management action

All actions agreed with management are stated in terms of the residual risk they are designed to mitigate.

- **Extreme residual risk:** critical and urgent in that failure to address the risk could lead to one or more of the following: catastrophic loss of the LRFS services, loss of life, significant environmental damage or significant financial loss, with related national press coverage and substantial damage to the LRFS reputation. *Remedial action must be taken immediately.*
- **High residual risk:** critical in that failure to address the issue or progress the work would lead to one or more of the following: failure to achieve organisational objectives, significant disruption to the LRFS business or to users of its services, significant financial loss, inefficient use of resources, failure to comply with law or regulations, or damage to the LRFS reputation. *Remedial action must be taken urgently.*
- **Medium residual risk:** failure to address the issue or progress the work could impact on operational objectives and should be of concern to senior management. *Prompt specific action should be taken.*
- **Low residual risk:** matters that individually have no major impact on achieving the service's objectives, but when combined with others could give cause for concern. *Specific remedial action is desirable.*