APPENDIX 10(a)

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Blackpool Council

Planning report to the Audit Committee for the year ending 31 March 2021

Issued on 20 September 2021 for the Audit Committee on 30 September 2021

Deloitte Confidential: Public Sector

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Introduction

The key messages in this report:

Audit quality is our number one priority. We plan our audit to focus on audit quality and have set the following audit quality objectives for this audit:

- A robust challenge of the key judgements taken in the preparation of the financial statements.
- A strong understanding of your internal control environment.
- A well planned and delivered audit that raises findings early with those charged with governance.

We have pleasure in presenting our planning report to the Audit Committee for the 2021 audit. We would like to draw your attention to the key messages as set out below:

Audit Scope	Our principal audit objective is to obtain sufficient, relevant and reliable audit evidence to enable us to express an opinion on the statutory accounts of the Council prepared in accordance with the Code of Practice on Local Authority Accounting ("the Code") issued by CIPFA for the period ending 31 March 2021. We will conduct our audit in accordance with International Standards on Auditing (UK) ("ISAs UK") as adopted by the UK Auditing Practices Board ("APB"), and Code of Audit Practice issued by the National Audit Office. Our responsibilities as auditor, and the responsibilities of the Council, are set out in the 'PSAA Statement of responsibilities of auditors and audited bodies: Principal Local Authorities and Police Bodies' published by Public Sector Audit Appointments Limited.
Significant Risks	In our audit planning report for 2020, we identified the following areas of significant audit risk which we expect to remain as significant risks of material misstatement in the 2020/21 statement of accounts: • Completeness of accrued expenditure – there is an inherent fraud risk associated with the under recording of expenditure in order for the Council to report a more favourable year-end position. We specifically focus this on expenditure accruals. • Management override of controls – auditing standards presume there is a risk that the accounts may be fraudulently misstated by management overriding controls. Key areas of focus are: bias in the preparation of accounting estimates; inappropriate journal entries; and transactions which have no economic substance. • Land and Buildings, and Investment Property valuations – valuations are inherently judgemental and include a number of assumptions Through our planning work performed, we have identified the following changes in audit risks: • Risk of fraud in revenue recognition – we have identified this as a significant risk in the current year as, under ISA 240, there is a presumed risk that revenue may be misstated due to improper revenue recognition. Our judgement is that the significant risk at the Council relates to the recognition of grants with terms and conditions attached including the Covid-19 grants received. There is a risk that the Council will recognise the income before the terms and conditions have been met. There are also a number of grants relating to covid-19, such as the business rates relief, where management need to determine if they are acting in the capacity of an Agent or Principal.

Introduction

The key messages in this report (continued):

Value for Money	The National Audit Office's 2020 Code of Audit Practice revises the scope of the required work of the auditor on bodies' arrangements to secure value for money, moving away from a binary conclusion on arrangements in the audit report to a narrative commentary in a new "Auditor's Annual Report" (which replaces the Annual Audit Letter). The new requirements in this area are discussed further on pages 22-23.
Brexit	The Council will be preparing its Annual Report against the backdrop of continued uncertainty related to Brexit. The Council will also need to consider the inclusion of Brexit in the Annual Report for 2020/21, particularly in the areas of risk reporting, going concern and impairment.
Covid-19	See pages 12 to 14 for details of how Covid-19 may impact the Council's Narrative Report, financial statements and the overall audit process.

Responsibilities of the Audit Committee

Helping you fulfil your responsibilities

Why do we interact with the Audit Committee?

To communicate audit scope

To provide timely and relevant observations

To provide additional information to help you fulfil your broader responsibilities

As a result of regulatory change in recent years, the role of the Audit Committee has significantly expanded. We set out here a summary of the core areas of Audit Committee responsibility to provide a reference in respect of these broader responsibilities.

Oversight of external audit

- At the start of each annual audit cycle, ensure that the scope of the external audit is appropriate

Integrity of reporting

- Impact assessment of key judgements and level of management challenge
- Review of external audit findings, key judgements, and level of misstatements
- Assess the quality of the internal team, their incentives and the need for supplementary skillsets
- Assess the completeness of disclosures, including consistency with disclosures on operational model and strategy

Internal controls and risks

- Review the internal control and risk management systems
- Explain what actions have been, or are being, taken to remedy any significant failings or weaknesses

Oversight of internal audit

- Monitor and review the effectiveness of the internal audit activities
- Consider annually whether the scope of the internal audit programme is adequate

Whistle-blowing and fraud

- Ensure that appropriate arrangements are in place for the proportionate and independent investigation of any concerns that are raised by staff in connection with improprieties

Our audit explained

We tailor our audit to your business and your strategy

Identify changes in your business and environment

We have spent time with management understanding the current year matters to assist with the preparation of our risk assessment for the audit. The matter which will have the biggest impact will be the continuing impacts from the Covid-19 pandemic. We will continue to keep this under review throughout the audit process.

Scoping

Our work will be carried out in accordance with the Code of Audit Practice and supporting auditor guidance notes issued by the NAO.

More detail is given on page 7.

In our final report

In our final report to you we will conclude on the significant risks identified in this paper, report to you our other findings, and detail those items we will be including in our audit report.

Determine materiality

We have determined materiality for the Group and Council only of £11.2m (2019/20 £10.8m) and £10.5m (2019/20 £9.9m) respectively. This is based on 2% of gross expenditure per the 2020/21 draft financial statements. We have set performance materiality for the Group and Council of £7.3m (2019/20 £7.5m) and £6.8m (2019/20 £6.9m) respectively. We will report to you any misstatements above £0.5m (2019/20 £0.5m). We will also report to you any misstatements below this threshold if we consider them to be material by nature.

Significant risk assessment

The significant risks identified for 2020/21 are the same as those for 2019/20, except for the risk of fraud in revenue recognition as noted on page 3. More details on the significant risks for the current year are given on pages 15 to 19.

Quality and Independence

We confirm all Deloitte network firms and engagement team members are independent of Blackpool Council. We take our independence and the quality of the audit work we perform very seriously. Audit quality is our number one priority.

Scope of work and approach

We have four key areas of responsibility under the Audit Code

Financial statements

We will conduct our audit in accordance with the Code of Audit Practice and supporting guidance issued by the National Audit Office (''NAO'') and International Standards on Auditing (UK) ("ISAs (UK)") as adopted by the UK Auditing Practices Board ("APB"). The Council will prepare its accounts under the Code of Practice on Local Authority Accounting ("the Code") issued by CIPFA and LASAAC.

We report on whether the financial statements:

- Give a true and fair view of the financial position and income and expenditure; and
- Are prepared in line with the Code of Practice on Local Authority Accounting (''the Code'').

Annual Governance Statement

We are required to report on whether other information published with the audited financial statements is consistent with the financial statements.

Other information includes information included in the Statement of Accounts, in particular the Narrative Report. It also includes the Annual Governance Statement which the Council is required to publish alongside the Statement of Accounts.

In reading the information given with financial statements, we take into account our knowledge of the Council, including that gained through work in relation to the Council's arrangements for securing value for money through economy, efficiency and effectiveness in its use of resources.

Value for Money conclusion

The National Audit Office's 2020 Code of Audit Practice revises the scope of the required work of the auditor on bodies' arrangements to secure value for money, moving away from a binary conclusion on arrangements in the audit report to a narrative commentary in a new "Auditor's Annual Report" (which replaces the Annual Audit Letter). See pages 22-23 for full details of the new requirements in this area.

Group audit

We are undertaking our scoping of the components for the Group audit and will perform direct testing of the subsidiary balances which are material to the Group financial statements. In the prior year, we noted the main subsidiary companies in the context of the Group audit were Blackpool Transport Services and Blackpool Coastal Housing. However, due to their size, they were not considered to be significant components.

Scope of work and approach

Our approach

Liaison with Internal Audit

The Auditing Standards Board's version of ISA (UK) 610 "Using the work of internal auditors" prohibits use of Internal Audit to provide "direct assistance" to the audit. Our approach to the use of the work of Internal Audit has been designed to be compatible with these requirements.

We will review Internal Audit reports and meet with the team to discuss their work. We will discuss the work plan for Internal Audit, and where they have identified specific material deficiencies in the control environment, we will consider adjusting our testing so that the audit risk is covered by our work.

Using these discussions to inform our risk assessment, we can work together with Internal Audit to develop an approach that avoids inefficiencies and overlaps, therefore avoiding any unnecessary duplication of audit requirements on the Council's staff.

Approach to controls testing

Our risk assessment procedures will include obtaining an understanding of controls considered to be 'relevant to the audit'. This involves evaluating the design of the controls and determining whether they have been implemented ("D & I").

The results of our work in obtaining an understanding of controls and any subsequent testing of the operational effectiveness of controls will be collated and the impact on the extent of substantive audit testing required will be considered.

Promoting high quality reporting to stakeholders

We view the audit role as going beyond reactively checking compliance with requirements: we seek to provide advice on evolving good practice to promote high quality reporting.

We recommend the Council complete the Code checklist during drafting of their financial statements.

We will perform an early review of the draft financial statements and will provide any insights to management on a timely basis.

Continuous communication and reporting

Planned timing of the audit

As the audit plan is executed throughout the year, the results will be analysed continuously and conclusions (preliminary and otherwise) will be drawn. The following sets out the expected timing of our reporting to and communication with you.

Planning	Year end fieldwork	Reporting activities
Planning meetings to inform risk assessment; and agree on key judgemental accounting issues. Update understanding of key and changes to financial reporting. Review of key Council documents including Executive, Council and Audit Committee minutes.	Document design and implementation of key controls and update understanding of key business cycles. Update on value for money responsibilities. Scoping of components for the Group audit. Substantive testing of all areas. Finalisation of work in support of value for money responsibilities. Detailed review of annual accounts and report, including Annual Governance Statement. Review of final internal audit reports and opinion. Completion of testing on significant audit risks.	Year-end closing meetings. Reporting of significant control deficiencies. Signing audit reports in respect of Financial Statements. Whole of Government Accounts reporting. Issuing Auditor's Annual Report.
2020/21 Audit Plan	Verbal update to the Audit Committee	Final report to the Audit Committee
September 2021	**August - October 2021**	**November 2021**

Ongoing communication and feedback

Significant risks

Our risk assessment process

We consider a number of factors when deciding on the significant audit risks. These factors include:

- the significant risks and uncertainties previously reported in the Narrative Report and financial statements;
- the IAS 1 critical accounting estimates previously reported in the Narrative Report and financial statements;
- the disclosures made by the Audit Committee in their previous Audit Committee report;
- our assessment of materiality; and
- the changes that have occurred in the business and the environment it operates in since the last Narrative Report and financial statements.

Deloitte view

Management must carefully consider the principal risks, uncertainties and accounting estimates of the Council.

Page 15 summarises the significant risks that we will focus on during our audit.

Principal risk and uncertainties

- Resource management
- Information governance
- Ability to secure commercial opportunities
- Underachievement of savings
- Health & Safety

Changes in your business and environment

- Impacts of Covid-19
- Continued overspends in Children & Young People's Services
- Overspend in Health and Adult Services
- Increasing income generation from more commercial activities

IAS 1 Critical accounting estimates

- Future funding levels
- Property valuations
- Recognition of schools' fixed assets
- Pension liabilities
- Valuation of investments
- Provisions and contingencies
- Investment valuations

NAO – Auditor Guidance Note 06

The National Audit Office identified transitional protection for certain pension scheme members, Guaranteed Minimum Pensions Equalisation, Dedicated Schools Grant – negative reserve, and pension guarantees to other entities as key issues in their Local Government Audit Planning guidance issued in June 2021.

We reviewed the approach being taken by the Council in response to these in the prior year audit and will refresh our understanding for the current year.

We do not believe any of these matters represent a significant audit risk but we will carefully review the approach being taken by the Council to address these issues.

Materiality

Our approach to materiality

Basis of our materiality benchmark

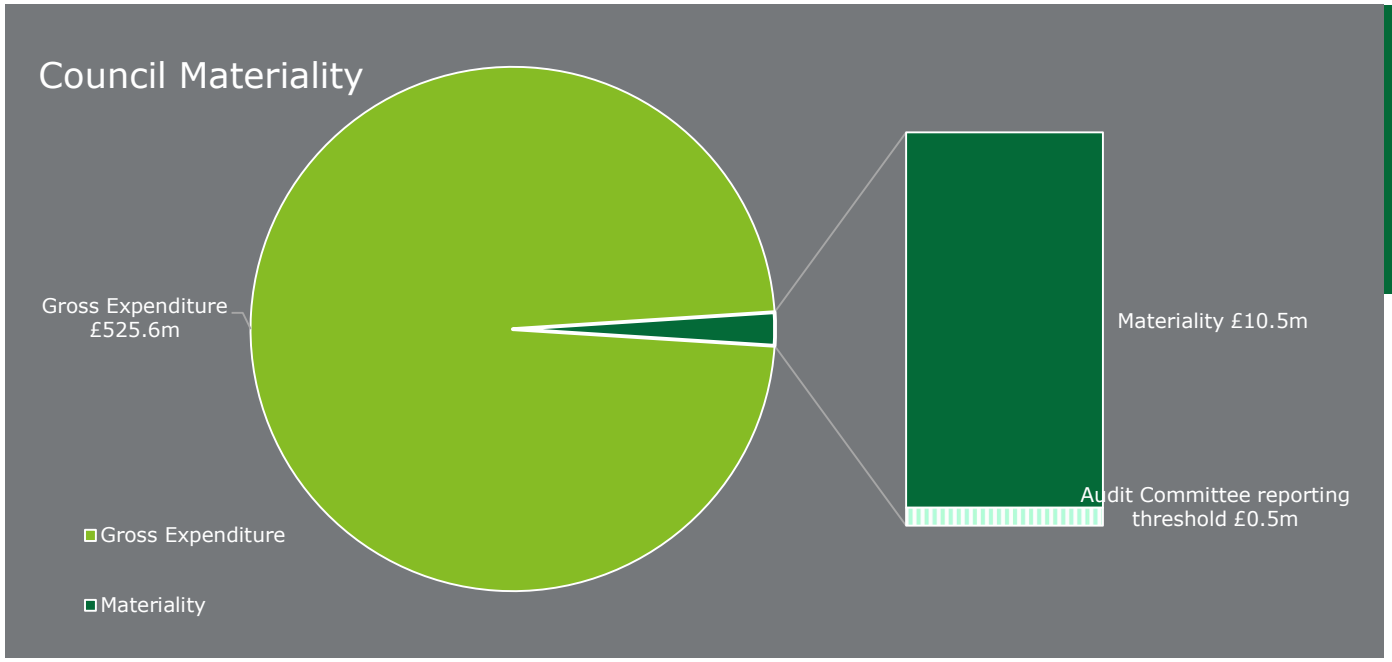
- We have determined materiality for the Group and Council only of £11.2m (2019/20 £10.8m) and £10.5m (2019/20 £9.9m) respectively, based on professional judgement, the requirements of auditing standards and the financial measures most relevant to users of the financial statements.
- We have used 2% of gross expenditure based on the draft 2020/21 accounts as the benchmark for determining our preliminary materiality.

Reporting to those charged with governance

- We will report to you all misstatements found in excess of £0.5m (2019/20 £0.5m).
- We will report to you misstatements below this threshold if we consider them to be material by nature.

Reporting on Group Accounts

- Based on our assessment of the draft year end position we have identified that we will need to undertake detailed testing on the subsidiary balances which are material to the Group financial statements.



Although materiality is the judgement of the audit partner, the Audit Committee must satisfy themselves that the level of materiality chosen is appropriate for the scope of the audit.

Covid-19 pandemic and its impact on our audit

Requirements	CIPFA has issued guidance highlighting the importance of considering the impact of Covid-19 in preparation of the financial statements, including communicating risks and governance impacts in narrative reporting. This is consistent with the Financial Reporting Council's guidance to organisations on the importance of communicating the impact of Covid-19 and related uncertainties, including their impact on resilience and going concern assessments. Entity-specific explanations of the current and expected effects of Covid-19 and the Council's plans to mitigate those effects should be included in the narrative reporting (including where relevant the Annual Governance Statement), including in the discussion on Principal Risks and Uncertainties impacting an organisation. As well as the effects upon reserves, financial performance and financial position, examples of areas highlighted by CIPFA include the impact on service provision, changes to the workforce and how they are deployed, impacts upon the supply chain, cash flow management, and plans for recovery. Risks highlighted include those relating to subsidiaries and investments, capital programmes, and resilience of the community including partner organisations and charities.
Actions	We therefore expect a thorough assessment of the current and potential future effects of the Covid-19 pandemic including: • A detailed analysis across the Council's operations, including on its income streams, supply chains and cost base, and the consequent impacts on financial position and reserves; • The economic scenario or scenarios assumed in making forecasts and on the sensitivities arising should other potential scenarios materialise (including different funding scenarios); and • The effect of events after the reporting date, including the nature of non-adjusting events and an estimate of their financial effect, where possible.

Impact on the Council	Impact on annual report and financial statements	Impact on our audit
We will consider the key impacts on the business such as: • Interruptions to service provision • Supply chain disruptions • Unavailability of personnel • Reductions in income • The closure of facilities and premises	We have considered the impact of the outbreak on the annual report and financial statements, discussed further on the next slide including: • Principal risk disclosures • Impact on property, plant and equipment • Valuation of commercial or investment properties • Impact on pension fund investment measurement and impairment • Going concern assessment • Events after the reporting period and relevant disclosures • Bad debts provision policy • Narrative reporting • Impairment of non-current assets • Allowance for expected credit losses	We have considered the impact on the audit including: • Resource planning • Timetable of the audit • Impact on our risk assessment • Logistics including meetings with entity personnel

Covid-19 impact on annual report and financial statements

Impact on property, plant and equipment	The Royal Institute of Chartered Surveyors issued a practice alert in March 2020, as a result of which valuers identified a material valuation uncertainty at 31 March 2020 for most types of property valuation, resulting in disclosure in financial statements and "emphasis of matter" paragraphs in audit reports. By September 2020, RICS considered that there was no longer material uncertainty over valuations from that date, and therefore valuations at 31 March 2021 are not expected to be affected by material valuation uncertainties. However, the on-going financial impact of the pandemic has impacted valuations, both through demand for particular asset types and weakening the financial standing of tenants. The Council needs to consider its approach to the measurement of property, plant and equipment (PPE). Where property held at current value is based on market valuations the Council should consider with their valuers the impact that Covid-19 has had on current value. The Council will also need to consider whether there are any indications of impairment of assets requiring adjustment at 31 March 2021.
Valuation of commercial or investment properties	Following the Covid-19 pandemic, the fair value measurements for financial instruments and investment properties held by the Council needs to be reviewed against the conditions and assumptions at the measurement date. Although volatility is lower relative to 31 March 2020, there have been significant market movements during the year which may impact valuations.
Impact on pension fund investment measurement	As a result of the Covid-19 pandemic, pension fund investments have been subject to volatility. It is important to engage early with custodians and fund managers to not only gather information for year-end measurements but to also understand any estimation techniques and any changes to those techniques that may be needed to measure the financial instruments. Where such volatility exists it may mean that the inputs used in the fair value measurement may change and may require a change of measurement technique, and consideration of the level of uncertainty in valuations where there is significantly more estimation.
Expected credit losses	Since 31 March 2020, there has been a significant downturn in economic activity, with many businesses and individuals significantly impacted. The Council will need to consider the provision for credit losses for receivables, including for expected credit losses for assets accounted for under IFRS 9.
Recoverability of long term debtors	The Council has provided loans to a number of its subsidiaries and also, under the Business Loan Fund, to private companies. Due to the potential detrimental impact of Covid-19 on a wide range of companies within the economy, there is an increased risk over the recoverability of these loans. The Council will need to perform a detailed assessment of the recoverability of the outstanding loans.

Covid-19 impact on annual report and financial statements (continued)

Financial risk disclosures	The Council needs to report on the impact of financial pressures and its financial sustainability in the Narrative Report and the relevant liquidity reporting requirements under the Code's adoption of IFRS 7 Financial Instruments: Disclosures.
Narrative and other reporting issues	The following areas will need to be considered by local authorities as having being impacted on by the Covid-19 pandemic. • Narrative reporting as well as the usual reporting requirements will need to cover the effects of the pandemic on services, operations, performance, strategic direction, resources and financial sustainability. • Reporting judgements and estimation uncertainty, the Council will need to report the impact on material transactions including decisions made on the measurements of assets and liabilities
Events after the reporting period	The economic environment and impact of the pandemic continues to be highly uncertain. The Council will need to consider the events after the reporting period and whether these events will be adjusting or non-adjusting and make decisions on a transaction by transaction basis. The nature of the Covid-19 pandemic will mean that the Council will need to continue to review and update these assessments up to the date the accounts are authorised for issue.

Significant risks

Significant risk dashboard

Risk	Material	Fraud risk	Planned approach to controls	Level of management judgement/ estimate	Slide no.
Completeness of Accrued Expenditure	✓	✓	D+I	⚠	16
Management Override of Controls	✓	✓	D+I	⚠	17
Property Valuations	✓	✗	D+I	⚠	18
Risk of Fraud in Revenue Recognition	✓	✓	D+I	⚠	19

D+I: Assessing the design and implementation of key controls

⚠ Low level of management judgement/ estimate

⚠ Moderate level of management judgement/ estimate

⚠ High level of management judgement/ estimate

Significant risks

Risk 1 – Completeness of Accrued Expenditure

Risk identified	Under ISA 240, there is a presumed risk that revenue may be misstated due to improper revenue recognition. In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition. In the current year, we have identified the risk as relating specifically to year end accruals. There is an inherent fraud risk associated with the under recording of expenditure in order for the Council to report a more favourable year-end position. For Blackpool Council, there is therefore an inherent risk that it may materially misstate its expenditure through the understatement of accruals in an attempt to report a more favourable year end position.
Our response	Our work in this area will include the following: • We will update our understanding of, and test the design and implementation of, the key controls in place in relation to recording of accruals; • We will review and discuss with management any accounting estimates relating to expenditure recognition, such as manual accruals, for evidence of bias; and • We will perform focused testing in relation to the completeness of accruals through testing of post-year end payments made.

Significant risks

Risk 2 – Management Override of Controls

Risk identified	In accordance with ISA 240 (UK), management override of controls is a significant risk due to fraud for all entities. This risk area includes the potential for management to use their judgement to influence the financial statements as well as the potential to override the Council's controls for specific transactions. The key judgements in the financial statements include those which we have selected to be the significant audit risks, (completeness of accrued expenditure, the Council's property valuations and recognition of grant income) and any one-off and unusual transactions where management could show bias. These are inherently the areas in which management has the potential to use their judgment to influence the financial statements.
Our response	In considering the risk of management override, we plan to perform the following audit procedures that directly address this risk: • We will test the design and implementation of key controls in place around journal entries and key management estimates; • We will risk assess journals and select items for detailed testing. The journal entries will be selected using computer-assisted profiling based on areas which we consider to be of increased interest; • We will review accounting estimates for biases that could result in material misstatements due to fraud; and, • We will obtain an understanding of the business rationale of significant transactions that we become aware of that are outside of the normal course of business for the Council, or that otherwise appear to be unusual, given our understanding of the entity and its environment.

Significant risks

Risk 3 – Property Valuations

Risk identified	The value of land and buildings and investment properties represent significant balances in the Council's financial statements and are subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgements in respect of key assumptions and apply estimation techniques to calculate the year-end balances recorded in the balance sheet. The Council has adopted a rolling revaluation model which sees all land and buildings revalued over a four year cycle. As a result of this, however, individual assets may not be revalued for three years and any changes to the factors used in the valuation process could materially affect the value of the Council's assets as at year end. There is therefore a risk that the value of property assets materially differ from the year end fair value, particularly given that valuations are inherently judgemental and include a number of assumptions. It should be noted that investment properties are all valued in full on an annual basis. As a result of the Covid-19 pandemic there has been significant market movements during the year which will impact on the valuations of the investment properties held by the Council. This increases the level of judgment required in valuing the assets.
Our response	Our work in this area will include the following: • We will review the design and implementation of the controls in place in relation to property valuations; • We will consider the work performed by the Council's valuer, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work; • We will engage our valuation specialists, Deloitte Real Estate, to review and challenge the appropriateness of the assumptions used in the valuation of the Council's property assets; • We will sample test key asset information used by the Council's valuers in performing their valuation, such as gross internal areas, back to supporting documentation; • We will review assets not subject to valuation in 2020/21 and confirm that the remaining asset base is not materially misstated; • We will consider the impact of Covid-19 on the valuation of property assets and ensure, where necessary, the Council has reflected the impact in their valuations; and • We will review the presentation of revaluation movements, and the disclosures included in the Statement of Accounts.

Significant risks

Risk 4 – Risk of Fraud in Revenue Recognition

Risk identified	Under ISA 240, there is a presumed risk that revenue may be misstated due to improper revenue recognition. Local authorities have a statutory duty to balance their annual budget and are operating in a financially challenged environment with reducing levels of government funding and increasing demand for services. Achievement of budget is critical to minimising the impact and usage of the Council's usable reserves and provides a basis for the following year's budget. Any deficit outturn against the budget is therefore not a desirable outcome for the Council and management, and therefore this desire to achieve budget increases the risk that the financial statements may be materially misstated. Our judgement is that the significant risk at the Council relates to the recognition of grants with terms and conditions attached, including the new grants received in year relating to Covid-19 where terms and conditions may be less clear and there is no historical basis for the accounting treatment. There is a risk that the Council will recognise the income before the terms and conditions have been met. There are also a number of grants relating to Covid-19, such as the business rates relief, where management need to determine if they are acting in the capacity of an Agent or Principal.
Our response	Our work in this area will include the following: • We will test the design and implementation of key controls in place around the recognition of grant income; • We will review the accounting treatment of new Covid-related grants for 2020/21 to confirm that they have been correctly accounted for as either an Agent or Principal arrangement; and • We will test a sample of grants including the new Covid-related grants to ensure that any terms and conditions were met prior to recognition as income.

Other areas of audit focus

Other accounting judgments and areas of focus which have not currently been identified as significant audit risks are as follows

Risk identified	Our response
Pension liability valuation The net pension liability is a material element of the Council's balance sheet. The valuation of the Scheme relies on a number of assumptions, including actuarial assumptions, and actuarial methodology which results in the Council's overall valuation. Furthermore there are financial and demographic assumptions used in the calculation of the Council's valuation – e.g. the discount rate, inflation rates, mortality rates. These assumptions should also reflect the profile of the Council's employees, and should be based on appropriate data. There is a risk that the assumptions and methodology used in the valuation of the Council's pension obligation are not reasonable. This could have a material impact to the net pension liability accounted for in the financial statements. In the current year, the Council has made the decision to pay the employer pension contributions and deficit contributions for 21/22 and 22/23 upfront. The total value of the contributions was £23m.	Our work in this area will include the following: • We will evaluate the competency, objectivity and independence of the actuarial specialist; • We will review the methodology and appropriateness of the assumptions used in the valuation, utilising a Deloitte Actuary to provide specialist assessment of the variables used; • We will review the accounting treatment for the pension prepayment; and • We will review the pension related disclosures in the financial accounts.
Investment valuations The subsidiary entities are valued by an external valuer, based on a range of assumptions including the future expected performance of the individual entities. Due to the impact of Covid-19 on the economy, there is an increased risk that some of these investments may require impairment if the business plans have been impacted significantly.	Our work in this areas will include the following: • We will obtain the valuations provided by Smith Craven; • We will involve our valuation specialists to assist in our assessment of the assumptions and methodology underpinning the valuations; • We will hold discussions with Smith Craven to further develop our understanding of the valuation approach; and • For a sample of the investments held by the Council, we developed an independent valuation range to assess the reasonableness of the Council's current investment values.

Other areas of audit focus

Other accounting judgments and areas of focus which have not currently been identified as significant audit risks are as follows (continued)

Risk identified	Our response
Long term debtor recoverability At 31 March 2021, the Council had provided loans totalling £86m to a number of its subsidiaries and private companies. During the year, the Council offered a six month repayment holiday from 1 April 2020 to 30 September 2020 to all businesses with a loan from the Council. Due to the impact of Covid-19 on a wide range of companies within the economy, we believe there is a risk that some of these entities may not be able to repay the loans provided by the Council, and as a result the value of the loans at 31 March 2021, may need to be impaired.	Our work in this area will include the following: • We will obtain loan agreements from the Council for a sample of loans. We will review the terms and conditions included in the agreements, with a particular focus on any collateral that is included in the agreements; • We will review and assess the current operational status of each company in our sample, including reviewing the latest set of audited financial statements for the company, in order to identify any potential risks to the recoverability of the loan provided by the Council; and • We will obtain and review management's assessment of the recoverability of the loans.

Value for Money

Areas of focus

We are required to consider the Council's arrangements for securing economy, efficiency and effectiveness in the use of resources. Under the revised requirements of the Code of Audit Practice 2020 and related Auditor Guidance Note 03, we are required to:

- Perform work to understand the Council's arrangements to secure economy, efficiency and effectiveness in the use of resources against each of the three reporting criteria:
    - **Financial sustainability**: How the body plans and manages its resources to ensure it can continue to deliver its services.
    - **Governance**: How the body ensures that it makes informed decisions and properly manages its risks.
    - **Improving economy, efficiency and effectiveness**: How the body uses information about its costs and performance to improve the way it manages and delivers its services.
- Undertake a risk assessment to identify whether there are any risks of significant weaknesses in arrangements;
- If any risks of significant weaknesses are identified, perform procedures to determine whether there is in fact a significant weakness in arrangements, and if so to make recommendations for improvement;
- Issue a narrative commentary in the Auditor's Annual Report (which replaces the Annual Audit Letter), setting out the work undertaken in respect of the reporting criteria and our findings, including any explanation needed in respect of judgements or local context for findings. If significant weaknesses are identified, the weaknesses and recommendations will be included in the reporting, together with follow-up of previous recommendations and whether they have been implemented. Where relevant, we may include reporting on any other matters arising we consider relevant to VfM arrangements, which might include emerging risks or issues.
- Where significant weaknesses are identified, report this by exception within our financial statement audit opinion.

The National Audit Office and the audit firms are continuing to discuss the practical implementation of these new requirements and expectations as to the extent of procedures underpinning these requirements, including the timetable required for VfM work and reporting for 2020/21. Expectations in this area are likely to continue to evolve as practical issues emerge in implementation. We have included a letter to the Audit Committee on page 39 detailing the VfM extension.

Specific areas that we expect to focus on in understanding the Council's arrangements include the Council's response to the financial pressures from Covid-19 in 2020/21 and the Council's longer term planning for financial sustainability, the 2018 Ofsted findings in relation to children's services and the Council's commercial activities.

Value for Money

Areas of focus (continued)

Ofsted Findings

In November and December 2018, Ofsted conducted an inspection of children's social care services. Following this inspection, the Children's Services were given an overall rating in the report (January 2019) of 'Inadequate'.

Our work in this area will involve:

- Review of any subsequent correspondence with Ofsted;
- Consideration of the findings and conclusions made in the Ofsted report, including review of the Council's progress to date in delivering actions to address the findings; and
- Review of management progress in developing an action plan and the arrangements put in place by the Council to deliver improvement

Commercial Activity

The Council has a number of ongoing commercial activities including the purchase and redevelopment of Houndshill shopping centre and the business loans made to its subsidiaries and private companies. There is an inherent risk associated with commercial activity and the Covid-19 pandemic has had a significant impact on a number of sectors including retail and hospitality.

Our work in this area will involve:

- Consideration of the robustness of the Council's governance arrangements used to assess the ongoing viability and other risks associated with the commercial activity; and
- Review of the processes in place to assess the risks to the Council when issuing new loans to third parties.

Financial Sustainability

The Council, like most of local government, faces significant challenges over the short and medium term due to the ongoing cuts in funding and increased demand for services. Covid-19 presents a significant financial challenge for the Council in 2020/21 and beyond.

Our work in this area will involve:

- Obtaining an understanding of the Council's Medium Term Financial Plan, budget for 2021/22 and transformation programmes;
- Discussions with the Director of Resources, and senior operational staff;
- Review of the Council's draft Narrative Report, Annual Governance Statement and Council papers and minutes;
- Consideration of issues identified in our financial statements audit work;
- Consideration of the Council's financial results, including delivery of savings, and the Council's plan; and
- Review of any reports from regulators issued in the year.

Revisions to auditing standards coming into effect

ISA (UK) 570 – Going concern

The Financial Reporting Council (FRC) issued a revised going concern standard in September 2019, that takes effect for periods commencing on or after 15 December 2019. For Local Government bodies, this will be March 2021 year ends and later.

The revision was made in response to recent enforcement cases and well-publicised corporate failures where the auditor's report failed to highlight concerns about the prospects of entities which collapsed shortly after.

We have summarised below the key areas of change in the standard – however, the Public Audit Forum is also consulting on changes to Practice Note 10, with the intention of reflecting public sector considerations in the approach to going concern, and so the ultimate impact of ISA (UK) 570 changes will be affected by this.

The key changes affect:

- Risk assessment procedures and related activities, increasing consideration of the entity's business model, operations and financing;
- The auditor's evaluation of management's assessment of the going concern assumption (which therefore requires a clearly documented assessment);
- Enhanced professional scepticism requirements, including around the evaluation of the sufficiency and appropriateness of audit evidence;
- Considering the appropriateness of disclosures; and
- Reporting in enhanced audit reports.

"The revised standard means UK auditors will follow significantly stronger requirements than those required by current international standards."

FRC's press release, 30 September 2019

Revisions to auditing standards coming into effect

ISA (UK) 540 – Auditing Accounting Estimates and Related Disclosures

Since 2015, the International Auditing and Assurance Standards Board (IAASB) has sought to identify audit issues relating to accounting estimates for financial institutions and other entities. Initially, this focused on the impact of IFRS 9 *Financial Instruments*, because it would fundamentally change the way that banks and other entities account for loan assets and other credit exposures.

However, the IAASB concluded that most, if not all, issues identified for expected credit losses would be equally relevant when auditing other complex accounting estimates. Accordingly, a holistic revision of ISA 540 was undertaken and the new standard takes effect for periods commencing on or after 1 January 2020. For Local Government bodies, this will be March 2021 year ends and later.

We summarise on the next few slides how this will impact our audit.

"There is a clear need to update ISA 540 to support better quality audits of increasingly complex accounting estimates"

FRC letter to the IAASB, July 2017

Area of change	Impact on our audit	Impact on the directors
Assessment of oversight and governance relating to estimates	In connection with our planning work to understand the entity and its environment, including internal control, we will specifically inquire regarding management's processes, and the oversight and governance of those processes relating to accounting estimates.	You will need to consider the adequacy of your processes and controls over estimates, and documentation thereof.

Revisions to auditing standards coming into effect

ISA (UK) 540 – Auditing Accounting Estimates and Related Disclosures

Area of change	Impact on our audit	Impact on the directors
Identification of inherent risk factors; separate assessment of inherent risk and control risk	Recognising a spectrum of inherent risk, we will assess risks of material misstatement in estimates with reference not only to estimation uncertainty, but also complexity, subjectivity or other inherent risk factors, and the interrelationship among them.	You will need to provide clear documented rationale for (a) the selection and application of the method, assumptions and data in making the accounting estimate, including any changes in the current year, and controls relating to those aspects; and/or (b) the selection of a point estimate and related disclosures for inclusion in the financial statements.
Objectives-based work effort requirements	We will specifically assess control risk relating to estimates, which may require us to evaluate the design and determine implementation of an increased number of internal controls. Our subsequent audit procedures will be responsive to this assessment, and designed to obtain evidence around the methods, significant assumptions, data and (where applicable) the selection of a point estimate and related disclosures about estimation uncertainty.	
Enhanced "stand back" requirement, to evaluate the audit evidence obtained	We will specifically design our procedures, to enhance our application of professional scepticism, so that they are not biased towards finding corroborative evidence; our overall evaluation of the evidence obtained will weigh both corroborative and contradictory evidence.	You should expect more challenge of the evidence provided in support of accounting estimates, use of external data sources and your consideration of contradictory evidence.

Revisions to auditing standards coming into effect

ISA (UK) 540 – Auditing Accounting Estimates and Related Disclosures

Area of change	Impact on our audit	Impact on the directors
Enhanced requirements about whether disclosures are "reasonable"	The extant ISA 540 required us to evaluate whether disclosures were "adequate". The change to "reasonable" will involve greater consideration of the overall meaning conveyed through disclosures. For example, where estimation uncertainty associated with an estimate is multiple times materiality, we will consider whether the disclosures appropriately convey the high degree of estimation uncertainty and the range of possible outcomes.	You should expect more challenge on disclosures relating to estimates, particularly for where you have selected a point estimate from a range and those with high estimation uncertainty.
New requirements when communicating with those charged with governance	In accordance with ISA (UK) 260 and ISA (UK) 265, our communications from the audit have included significant qualitative aspects of your accounting practices and significant deficiencies in internal control. With the revised ISA (UK) 540, these communications will specifically include matters regarding accounting estimates and take into account whether the reasons for our risk assessment relate to estimation uncertainty, or the effects of complexity, subjectivity or other inherent risk factors.	You should expect increased reporting in relation to accounting estimates.

Areas where we consider the impact to be greatest:

Key areas impacted will include property valuations, revenue recognition and provisioning, accruals and provisions.

Purpose of our report and responsibility statement

Our report is designed to help you meet your governance duties

What we report

Our report is designed to establish our respective responsibilities in relation to the financial statements audit, to agree our audit plan and to take the opportunity to ask you questions at the planning stage of our audit. Our audit plan, includes our consideration of key audit judgements and our planned scope.

What we don't report

As you will be aware, our audit is not designed to identify all matters that may be relevant to the Council.

Also, there will be further information you need to discharge your governance responsibilities, such as matters reported on by management or by other specialist advisers.

Finally, the views on internal controls and business risk assessment in our final report should not be taken as comprehensive or as an opinion on effectiveness since they will be based solely on the audit procedures performed in the audit of the financial statements and the other procedures performed in fulfilling our audit plan.

Use of this report

This report has been prepared for the Audit Committee on behalf of the Council, as a body, and we therefore accept responsibility to you alone for its contents. We accept no duty, responsibility or liability to any other parties, since this report has not been prepared, and is not intended, for any other purpose. Except where required by law or regulation, it should not be made available to any other parties without our prior written consent.

Other relevant communications

We will update you if there are any significant changes to the audit plan.

In the prior year, we communicated audit findings and control recommendations to management, and these will be followed up as part of our audit visits to assess how these have been addressed in the current year.

We welcome the opportunity to discuss our report with you and receive your feedback.

Deloitte LLP

Newcastle upon Tyne | 20 September 2021

Appendices

Audit adjustments

Prior year unadjusted misstatements

The following uncorrected misstatements were raised as part of the prior year audit. These uncorrected misstatements decreased the surplus by £6.7 million, decreased net assets by £7.1 million and decreased unusable reserves by £0.5 million.

		Debit/ (credit) CIES £'000	Debit/ (credit) in net assets £'000	Debit/ (credit) prior year reserves £'000
Misstatements identified in prior year				
Impairment of investment - BTS	[1]			
Cr Investment			(£5,750)	
Dr Expenditure		£5,750		
Promenade, Tramways valuation	[2]			
Dr Capital adjustment account				£496
Cr Property, Plant and equipment			(£496)	
Goodwin	[3]	£900		
Dr Expenditure				
Cr Pension liability			(£900)	
Impairment reserve	[4]			
Dr Revaluation Reserve				£9,251
Cr Capital adjustment account				(£9,251)
Opportunity Area grant	[5]			
Dr Income		£2,966		
Cr Expenditure		(£2,966)		
Total		**£6,650**	**(£7,146)**	**£496**

[1] Judgemental misstatement in relation to the value of the Council's investment in BTS.
[2] Judgemental misstatement in relation to the valuation of the Promenade, Tramways asset.
[3] The Council has elected not to include the adjustment in relation to the Goodwin ruling within the pension balance.
[4] Judgemental misstatement in relation to the impact of the Council assessment of reversal of historic impairments.
[5] Factual misstatement in relation to the opportunity area grant

Audit adjustments

Prior year disclosures

Disclosure misstatements

The following uncorrected disclosure misstatements were identified as part of the prior year audit.

Disclosure	Summary of disclosure requirement
FV disclosures	We identified some potential differences in the fair value disclosures as set out in Note 20 of the financial statements. As these items are disclosure only, we did not propose to amend the financial statements. However we do propose that the Council reviews the calculations from the treasury adviser to confirm that the methodology used complies with the accounting standards and CIPFA guidance.
Disclosure of judgement/uncertainty around business loan recoverability	There has been a widespread impact from the Covid-19 pandemic on the UK economy, one of the ways in which this affects the Council's financial statements specifically is an increased risk around the recovery of loans that it has provided companies in Blackpool from the Business Loan Fund. Given the judgemental nature of the assessment of recoverability this should be disclosed within the notes to the accounts.
Reconciliation of liabilities arising from financing activities	Cash and non-cash flows have been aggregated rather than being split into separate columns within the reconciliation.
Prior year Public Health gross expenditure	The prior year public health gross expenditure figure included an immaterial internal recharge amount which was not removed as part of the financial statement preparation process.
Trade Union Facility Time	Under the regulations the Council is required to include the facility time data in the Annual Report as well as publish on the Council's website.

Fraud responsibilities and representations

Responsibilities explained

Your Responsibilities:

The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance, including establishing and maintaining internal controls over the reliability of financial reporting, effectiveness and efficiency of operations and compliance with applicable laws and regulations.

Our Responsibilities:

- We are required to obtain representations from your management regarding internal controls, assessment of risk and any known or suspected fraud or misstatement.
- As auditors, we obtain reasonable, but not absolute, assurance that the financial statements as a whole are free from material misstatement, whether caused by fraud or error.
- As set out in the significant risks section of this document, we have identified the risk of fraud in expenditure accruals, grant income recognition and management override of controls as key audit risks for the Council.

Fraud Characteristics:

- Misstatements in the financial statements can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the financial statements is intentional or unintentional.
- Two types of intentional misstatements are relevant to us as auditors – misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.

We will request the following to be stated in the representation letter signed on behalf of the Council:

- We acknowledge our responsibilities for the design, implementation and maintenance of internal control to prevent and detect fraud and error.
- 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.
- We are not aware of any fraud or suspected fraud / We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the entity or group and involves:
  - (i) management;
  - (ii) employees who have significant roles in internal control; or
  - (iii) others where the fraud could have a material effect on the financial statements.
- We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the entity's financial statements communicated by employees, former employees, analysts, regulators or others.

Fraud responsibilities and representations

Inquiries

We will make the following inquiries regarding fraud:

Management:

- Management's assessment of the risk that the financial statements may be materially misstated due to fraud, including the nature, extent and frequency of such assessments.
- Management's process for identifying and responding to the risks of fraud in the entity.
- Management's communication, if any, to those charged with governance regarding its processes for identifying and responding to the risks of fraud in the entity.
- Management's communication, if any, to employees regarding its views on business practices and ethical behaviour.
- Whether management has knowledge of any actual, suspected or alleged fraud affecting the entity.
- We plan to involve management from outside the finance function in our inquiries.

Internal audit

- Whether internal audit has knowledge of any actual, suspected or alleged fraud affecting the entity, and to obtain its views about the risks of fraud.

Those charged with governance

- How those charged with governance exercise oversight of management's processes for identifying and responding to the risks of fraud in the entity and the internal control that management has established to mitigate these risks.
- Whether those charged with governance have knowledge of any actual, suspected or alleged fraud affecting the entity.
- The views of those charged with governance on the most significant fraud risk factors affecting the entity.

Independence and fees

As part of our obligations under International Standards on Auditing (UK), we are required to report to you on the matters listed below:

Independence confirmation	We confirm the audit engagement team, and others in the firm as appropriate, Deloitte LLP and, where applicable, all Deloitte network firms are independent of the Council and will reconfirm our independence and objectivity to the Audit Committee for the year ending 31 March 2021 in our final report to the Audit Committee.
Fees	There are no non-audit fees for 2020/21 outside of those noted in the table on the following page.
Non-audit services	We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.
Relationships	We have no other relationships with the Council, its directors, senior managers and affiliates, and have not supplied any services to other known connected parties.

Independence and fees (continued)

The professional fees expected to be charged by Deloitte in the period from 1 April 2020 to 31 March 2021 are as follows:

	Current year £	Prior year £
Financial statement audit including Whole of Government [1]*	84,818	84,818
Additional fee for prior year audit [2]*	-	TBC
Additional fee for changes in the current year [3]*	TBC	-
Total audit	**84,818**	**TBC**
Audit related assurance services – Teachers pension return	TBC	4,000
Audit related assurance services – Pooling of Housing Capital Receipts	TBC	4,000
Total assurance services	**TBC**	**8,000**
Total fees	**TBC**	**TBC**

[1] The fee reflected here is the scale fee. In line with recent PSAA correspondence that scale fees should be negotiated by individual s151 officers based on the individual circumstances of each body, we will be looking to discuss with the Council the current level of fee.

[2] Fee for additional audit work to be agreed. This will include the impact of the acquisition of Houndshill, Covid-19 procedures and prior year restatements.

[3] Fee for additional audit work relating to changes to the work required on Value for Money, updated auditing standards and Covid-19 procedures. We expect this to be in the range of £25,000 - £30,000.

* All additional fees are subject to agreement with PSAA.

Our approach to quality

AQR team report and findings

Executing high quality audits remains our number one priority. We are committed to our critical public interest role and continue to embed our culture of quality and excellence into all of our people. This includes using new technology and tools to continue to transform our audit approach.

In July 2021 the Financial Reporting Council ("FRC") issued individual reports on each of the seven largest firms, including Deloitte, on Audit Quality Inspections providing a summary of the findings of its Audit Quality Review ("AQR") team for the 2020/21 cycle of reviews.

We greatly value the FRC reviews of our audit engagements and firm wide quality control systems, a key aspect of evaluating our audit quality.

In that context, overall FRC inspection results, showing an improvement since last year from 76% to 79% of all inspections assessed as good or needing limited improvement, reflect the progress we are making. The overall profile of our ICAEW inspections and our internal inspection programme also show a similar overall improvement since last year.

The results for the inspections of FTSE 350 entities fell short of our overall scores, reflecting specific findings on those particular audits rather than issues pervasive across other audits. Our objective continues to be for all of our audits to be assessed as good or needing limited improvement and we know we still have work to do in order to meet this standard.

We agree with and accept the FRC's findings on the individual inspections. The FRC has recognised improvements following the actions and programmes for previous years and we welcome the good practice points raised, including in respect of impairment and revenue where individual findings continue to occur.

Overall, we are pleased that there have been no significant findings over our firm wide processes and controls over the last three inspection cycles in the areas subject to rotational review by the FRC. However, we are continually enhancing our processes and controls across our business and such changes will directly or indirectly affect audit quality.

All the AQR public reports are available on its website.
https://www.frc.org.uk/auditors/audit-quality-review/audit-firm-specific-reports

Our approach to quality

AQR team report and findings

The AQR's 2020/21 Audit Quality Inspection Report on Deloitte LLP

"We reviewed 19 individual audits this year and assessed 15 (79%) as requiring no more than limited improvements. Of the 11 FTSE 350 audits we reviewed this year, we assessed eight (73%) as achieving this standard".

"Our key findings related primarily to the need to:

- Improve the evaluation and challenge of management's key assumptions of impairment assessments of goodwill and other assets.
- Enhance the consistency of group audit teams' oversight of component audit teams.
- Strengthen the effectiveness and consistency of the testing of revenue."

"The firm has taken steps to address the key findings in our 2019/20 public report, with actions that included increasing the extent of consultations, and enhanced learning, coaching and support programmes.

We have identified improvements, for example, in the extent of challenge of management by audit teams in respect of the estimates used for model testing. This was identified as a key finding last year.

We also identified good practice in a number of areas of the audits we reviewed (including robust procedures relating to going concern and evidence to support the challenge of management in areas of key judgement) and in the firm-wide procedures (including establishing a centre of excellence focused on credit for banking audits to encourage the consistent application of the firm's methodology and guidance)."

Our approach to quality

AQR team report and findings

Improve the evaluation and challenge of management's key assumptions of impairment assessments of goodwill and other assets

How we have addressed this area as a firm

To address this finding, we have done, or plan, the following:

- We refreshed our Impairment Centre of Excellence ("COE") to establish clear partner leadership and introduced frequent communication touchpoints to share best practice, hot topics and technical updates.
- We performed a risk focused strategic allocation of impairment specialists for a selection of December 2020 audit engagements, taking into account industry knowledge and experience. Going forward we will seek to involve the EQCR partner to determine whether the allocated specialist should have industry knowledge or whether generalist knowledge would provide an enhanced independent challenge to an industry focused engagement team.
- We will update our impairment guidance notes and consultation document to include specific risk criteria which require further discussion with a panel of specialists, including, but not limited to, where the audit team develop their own model or where cashflow forecasts extend beyond a commonly used period.
- The launch of the Digital Blueprint project management tool will assist teams in prioritising their time across all areas of the audit.
- We will hold workshops with our partners and directors to bring to life the common causes that have led to FRC findings and to ensure greater consistency in expectations in respect of the expected depth of review.
- We have introduced a new coaching program to support the development of primary reviewing skills and to identify any reviewing skills gaps which need addressing.
- To respond to the poor quality and untimely preparation of information by the company for audit, we expect, where appropriate, to increase the communication with management and those charged with governance so that there are clearer expectations in respect of the quality of information prepared for audit.
- We have updated our impairment template memo to reflect the most recent inspection findings we will develop additional training materials on hot topics and areas of regulatory focus, for example, guidance to assist in the challenge of cash flow assumptions and cost reduction initiatives.
- We also developed a new template to support teams in auditing accounting estimates in response to the requirements of ISA (UK) 540 revised 'Auditing Accounting Estimates & Related Disclosures'.

How we addressed this area in our audit

- We have identified the impairment of the long term debtors as an area of audit focus and we will obtain and challenge managements assessment over the recoverability of the balances.
- We will review the key estimates in the financial statements as part of our planning procedures and ensure we complete all the required documentation relating to ISA 540.

Value for Money deadline extension

Letter to the Audit Committee highlighting Value for Money deadline extension

Dear Audit Committee

The National Audit Office issued guidance to auditors on 16 April 2021 setting out a revised timetable for completion of work on arrangements to secure value for money. This revised timetable reflected the impact of the ongoing pandemic on preparers and auditors of accounts. That guidance, established that the Auditor's Annual Report should be published within three months of the signing of the Audit Opinion. Therefore we have not yet issued our Auditor's Annual Report. Under the 2020 Code of Audit Practice, we are required to provide this letter setting out the reasons for the Auditor's Annual Report not being issued by 30 September 2021.

Yours faithfully

Nicola Wright
Audit Partner

Deloitte.