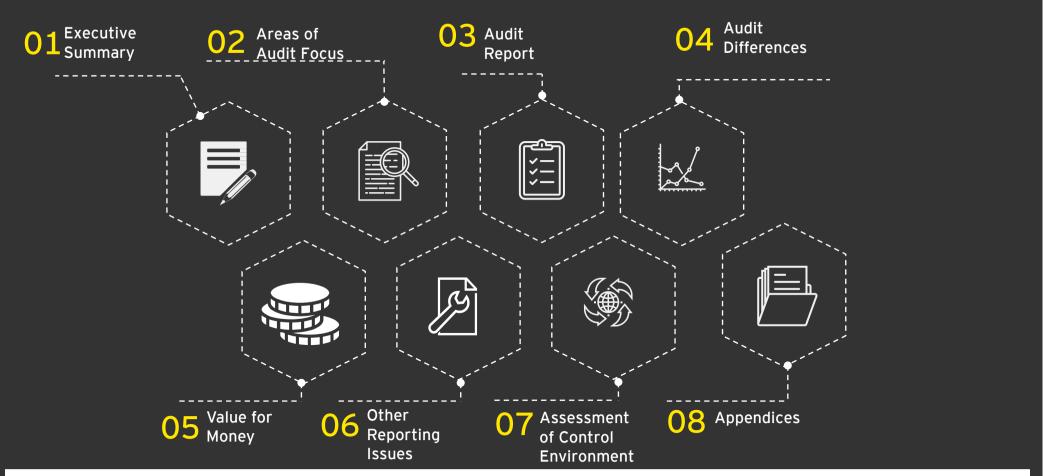


Contents



In April 2015 Public Sector Audit Appointments Ltd (PSAA) issued "Statement of responsibilities of auditors and audited bodies". It is available from the via the PSAA website (www.PSAA.co.uk).

The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The "Terms of Appointment (updated September 2015)" issued by the PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and in legislation, and covers matters of practice and procedure which are of a recurring nature..

This report is made solely to the Audit Committee, other members of the Authority and management of Borough Council of King's Lynn and West Norfolk in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Audit Committee, other members of the Authority and management of Borough Council of King's Lynn and West Norfolk those matters we are required to state to them in this 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 Audit Committee, other members of the Authority and management of Borough Council of King's Lynn and West Norfolk for this report or for the opinions we have formed. It should not be provided to any third-party without obtaining our written consent.





Overview of the audit

Scope and materiality

In our Audit Plan presented to the Audit Committee at their 13 February 2017 meeting, we gave you an overview of how we intended to carry out our responsibilities as your auditor. We carried out our audit in accordance with this plan. There have been no changes in our planned audit strategy.

We planned our procedures using a materiality of £1.732 million (for the group this was £1.748 million). We reassessed this using the actual results for the financial year, which has reduced this amount to £1.678 million (for the Group this is £1.697 million). The threshold for reporting audit differences has remained consistent at £0.08 million. The basis of our assessment of materiality has remained consistent with prior years at 2% of gross expenditure.

We also identified areas where misstatement at a lower level than materiality might influence the reader and developed a specific audit strategy for them. They include:

- Remuneration disclosures including any severance payments, exit packages and termination benefits. As these disclosures are considered to be of interest to users of the accounts we have adopted judgement in ensuring that we have tested the disclosures in sufficient detail to ensure they are correctly disclosed. In particular we have confirmed the figures for senior officer remuneration in full.
- Related party transactions. The accounting standard requires us to consider the disclosure from the point of materiality to either side of the transaction. We have therefore considered the nature of the relationship in applying materiality.
- Councillors' allowances. As these disclosures are considered to be of interest to users of the accounts we have adopted judgement in ensuring that we have tested the disclosures in sufficient detail to ensure they are correctly disclosed.



Executive summary (continued)

Status of the audit

We have substantially completed our audit of Borough Council of King's Lynn and West Norfolk's financial statements for the year ended 31 March 2017 and have performed the procedures outlined in our Audit plan. Subject to satisfactory completion of the following outstanding items (as at 13 July 2017) we expect to issue an unqualified opinion on the Authority's financial statements in the form which appears at Section 3. However until all work is complete, further amendments may arise. The items outstanding are:

- Creditors testing:
- Expenditure and Funding Analysis;
- Review of the final version of the financial statements:
- Completion of subsequent events review;
- Completion of final review procedures; and
- Receipt of the signed management representation letter

We expect to issue the audit certificate at the same time as the audit opinion.

Audit differences

At the time of writing this report there are no unadjusted audit differences arising from our audit.

We have identified a number of adjustments which have been corrected by management in the revised financial statements subject to approval. These are set out in Section 4.

We also identified a number of minor disclosure adjustments which have also been corrected by management. The more significant of these are set out in Section 4.



Executive summary (continued)

Areas of audit focus

Our Audit Plan identified key areas of focus for our audit of Borough Council of King's Lynn & West Norfolk's financial statements. This report sets out our observations and conclusions, including our views on areas which might be conservative, and where there is potential risk and exposure. We summarise our consideration of these matters, and any others identified, in the "Key Audit Issues" section of this report.

We ask you to review these and any other matters in this report to ensure:

- ► There are no other considerations or matters that could have an impact on these issues; and
- ▶ There are no other significant issues to be considered.

There are no matters, apart from those reported by management or disclosed in this report, which we believe should be brought to the attention of the Audit Committee.

Value for money

We have considered your arrangements to take informed decisions; deploy resources in a sustainable manner; and work with partners and other third parties. In our Audit Plan we identified the following significant risk:

• Sustainable resource deployment: Achievement of savings needed over the medium term.

We have no matters to report about your arrangements to secure economy efficiency and effectiveness in your use of resources.



Executive summary (continued)

Other reporting issues

We have reviewed the information presented in the Annual Governance Statement for consistency with our knowledge of the Authority. We have no matters to report as a result of this work.

We are not reporting any matters to the National Audit Office (NAO) regarding the Whole of Government Accounts submission as the Authority falls below the £350 million threshold for review as per the NAO's group instructions.

We have no other matters to report.

Control observations

We have adopted a fully substantive approach, so have not tested the operation of controls within key financial systems.

Independence

Please refer to Appendix B for our update on Independence. We have no independence issues to highlight.





Audit issues and approach: Risk of Fraud in Revenue Recognition

Revenue Recognition

What are our conclusions?

Our testing has not identified any material misstatements from revenue and expenditure recognition.

Overall our audit work did not identify any material issues or unusual transactions to indicate any misreporting of the Authority's financial position.

What is the risk?

Risk of fraud in revenue recognition

Under ISA240 there is a presumed risk that revenue may be misstated due to improper recognition of revenue.

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.

One area which may be susceptible to manipulation is the capitalisation of revenue expenditure on Property, Plant and Equipment given the extent of the Council's Capital programme.



What did we do?

- Review and test revenue and expenditure recognition policies;
- Review and discuss with management any accounting estimates on revenue or expenditure recognition for evidence of bias;
- Develop a testing strategy to test material revenue and expenditure streams;
- Review and test revenue cut-off at the period end date;
 and
- We will test the additions to the Property, Plant and Equipment balance to ensure that they are properly classified as capital expenditure.



Audit issues and approach: Management Override of Controls

Management Override

What are our conclusions?

We have not identified any material weaknesses in controls or evidence of material management override.

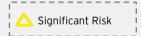
We have not identified any instances of inappropriate judgements being applied.

We did not identify any other transactions during our audit which appeared unusual or outside the Authority's normal course of business.

What is the risk?

Risk of management override

As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.



What did we do?

- Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements;
- Reviewing accounting estimates for evidence of management bias; and
- Evaluating the business rationale for significant unusual transactions.



Audit issues and approach: Presentation of the Financial Statements

Expenditure and Funding Analysis

What are our conclusions?

Our testing has not identified any material misstatements in the 2016/17 statement of accounts

A number of adjustments have been made to the EFA note in the statement of accounts. We have worked with the Council to ensure that the disclosures made are in line with the Code.

These adjustments were presentational in nature and did not impact the surplus or deficit figure in the CIES.

No other issues were identified during our work performed in this area.

What is the risk?

Financial statements presentation – Expenditure and funding analysis and Comprehensive income and expenditure statement

Amendments have been made to the Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 (the code) this year changing the way the financial statements are presented.

The new reporting requirements impact the Comprehensive Income and Expenditure Statement (CIES) and the Movement in Reserves Statement (MiRS), and include the introduction of the new 'Expenditure and Funding Analysis' note as a result of the 'Telling the Story' review of the presentation of local authority financial statements.

The Code no longer requires statements or notes to be prepared in accordance with SeRCOP. Instead the Code requires that the service analysis is based on the organisational structure under which the authority operates. We expect this to show the Council's segmental analysis.

This change in the code will require a new structure for the primary statements, new notes and a full retrospective restatement of impacted primary statements. The restatement of the 2015/16 comparatives will require audit review, which could potentially incur additional costs, depending on the complexity and manner in which the changes are made.

What did we do?

- Reviewing the expenditure and funding analysis, CIES and new disclosure notes to ensure disclosures are in line with the Code:
- Reviewing the analysis of how these figures are derived, and how the ledger system has been remapped to reflect the Council's organisational structure:
- Agreeing restated comparatives figures to the Council's segmental analysis and supporting working papers; and
- Due to the initial findings that the restated figures for gross expenditure and gross income did not agree to the 2015/16 financial statements, reviewing how overheads are apportioned across the service areas reported and their treatment.



Audit issues and approach: Property, Plant and Equipment Valuations

Property, Plant and Equipment Valuations

What are our conclusions?

Our testing has not identified any material misstatements in the property, plant and equipment figures in the 2016/17 statement of accounts

What is the risk?

Property, plant and equipment valuations

Property, Plant and Equipment (PPE) and Investment Properties represent the largest asset values on the Council's balance sheet. These assets are initially measured at cost and then revalued to fair value (determined by the amount that would be paid for the asset in its existing use) on a 5 year rolling basis. This is carried out by an internal valuer and is based on a number of complex assumptions. Annually assets are assessed to identify whether there is any indication of impairment.

ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of experts and assumptions underlying fair value estimates.

What did we do?

- Reliance on management's experts and review of the instructions given to that valuer;
- Consideration of the accounting treatments and basis of valuation as required by the Code;
- ► Test of detail if required; and
- Test of the journals and derivation of accounting entries.

Audit issues and approach: Pension Valuation and Disclosure

Pension Valuation and Disclosure

What are our conclusions?

Our testing has not identified any material misstatements in the pension valuation and disclosure in the 2016/17 statement of accounts

What is the risk?

Pension valuation and disclosure

The Council operates a defined benefits pension scheme. Accounting for this scheme involves significant estimation and judgement. The Pension liability is the largest value liability on the balance sheet. Due to the nature, volume and size of the transactions we consider this to be a risk.

What did we do?

- ► The actuarial expertise used by the Council:
- ► The reasonableness of the estimations and iudgements used:
- Liaising with the auditors of the Essex Pension Fund, to obtain assurances over the information supplied to the actuary in relation to Colchester Borough Council: and
- Assessing the conclusions drawn on the work of the actuary by the Consulting Actuary commissioned by the NAO, including the use of our own pension's specialists.



Audit issues and approach: Non-Domestic Rates Provision

Non-Domestic Rates
Provision

What are our conclusions?

Our testing has not identified any material misstatements in the NDR provision and relevant disclosure in the 2016/17 statement of accounts

What is the risk?

Non-Domestic Rates Provision

Councils need to provide for Business Rate appeals and will need to consider the following when estimating the provision under IAS 37. The council has developed an appropriate estimation methodology in previous years but this methodology needs to be reassessed to ensure that the assumptions made remain appropriate to prepare a reliable estimate for the 2016/17 financial statements.

What did we do?

- detailed accounting for business rates to ensure the Council's accounts are materially accurate and compliant with the CIPFA Code of practice; and
- Council's provision for business rate appeals to ensure it has been calculated on a reasonable basis in line with IAS 37. As part of this we will ensure the provision is supported by appropriate evidence and that the level of estimation uncertainty is adequately disclosed in the accounts.



Audit issues and approach: Group Consolidation

Group Consolidation

What are our conclusions?

Our testing has not identified any material misstatements in the group consolidation within the 2016/17 statement of accounts.

What is the risk?

Group Consolidation

The Council prepares group accounts to consolidate Alive Management Limited, which provides operational day to day management services for four sports facilities and a theatre.

The Council needs to ensure that the consolidation of the subsidiary is undertaken in line with the relevant accounting standards and in line with the code of practice.

What did we do?

- Providing group audit instructions to the component auditor specifying which specific balances we wish them to provide assurance over:
- Reviewing the outcomes of the component auditor's work; and
- ► Ensuring that appropriate consolidation procedures are applied when consolidating relevant entities into the BCKLWN group accounts.



Draft audit report

Our proposed opinion on the financial statements

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF THE BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

Opinion on the Authority's financial statements

We have audited the financial statements of Borough Council of King's Lynn & West Norfolk for the year ended 31 March 2017 under the Local Audit and Accountability Act 2014. The financial statements comprise the:

- Authority and Group Movement in Reserves Statement.
- Authority and Group Comprehensive Income and Expenditure Statement,
- Authority and Group Balance Sheet,
- Authority and Group Cash Flow Statement,
- the related notes 1 to 36 to the Authority Accounts and notes G1 to G7 to the Group Accounts
- and the Collection Fund and the related Collection Fund notes C1-C3.

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 2016/17.

This report is made solely to the members of Borough Council of King's Lynn & West Norfolk, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and for no other purpose, as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. 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.



Draft audit report (continued)

Our proposed opinion on the financial statements

Respective responsibilities of the Director of Finance and auditor

As explained more fully in the Statement of the Director of Finance's Responsibilities set out on pages 2, the Director of Finance 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 2016/17, and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.

Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error.

This includes an assessment of: whether the accounting policies are appropriate to the Authority and Group's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Director of Finance; and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the Statement of Accounts 2016-2017 to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by us in the course of performing the audit. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

Opinion on financial statements

In our opinion the financial statements:

- give a true and fair view of the financial position of Borough of King's Lynn & West Norfolk and Group as at 31 March 2017 and of its expenditure and income for the year then ended; and
- have been prepared properly in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.

Opinion on other matters

In our opinion, the information given in the Statement of Accounts 2016-2017 for the financial year for which the financial statements are prepared is consistent with the financial statements.



Draft audit report (continued)

Our proposed opinion on the financial statements

Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Council:
- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- 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;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

Conclusion on Borough of King's Lynn & West Norfolk's arrangements for securing economy, efficiency and effectiveness in the use of resources

Authority's responsibilities

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

Auditor's responsibilities

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The Code of Audit Practice issued by the National Audit Office (NAO) requires us to report to you our conclusion relating to proper arrangements.

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



Draft audit report (continued)

Our proposed opinion on the financial statements

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

We have undertaken our review in accordance with the Code of Audit Practice, having regard to the guidance on the specified criterion issued by the Comptroller and Auditor General (C&AG) in November 2015, as to whether the Authority had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. The Comptroller and Auditor General determined this criterion as that necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether the Authority put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2017.

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

Conclusion

On the basis of our work, having regard to the guidance issued by the C&AG in November 2015, we are satisfied that, in all significant respects, Authority put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2017.

Certificate

We certify that we have completed the audit of the accounts of Borough Council of King's Lynn & West Norfolk in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.

......Date:......July 2017

Mark Hodgson (senior statutory auditor) for and on behalf of Ernst & Young LLP, Appointed Auditor Cambridge



Audit Differences

Audit differences

In any audit, we may identify misstatements between amounts we believe <u>should</u> be recorded in the financial statements and disclosures and amounts <u>actually</u> recorded. These differences are classified as 'known' or 'judgemental'. Known differences represent items that can be accurately quantified and relate to a definite set of facts or circumstances. Judgemental differences generally involve estimation and relate to facts or circumstances that are uncertain or open to interpretation.

Summary of adjusted differences

We have included all known amounts greater than £0.08 million relating to Borough Council of King's Lynn & West Norfolk in our summary of misstatements below.

We highlight the following misstatements in the financial statements or disclosures identified during the audit. These have been corrected by management:

- £2.71 million reclassification between long-term investments and short-term investments (£2.38 million) and long-term receivables (0.33 million). This was due to the incorrect classification of the NWES loan.
- £0.30 million understatement of the council tax bad debt provision in the collection fund, resulting in a £0.03 million understatement for the Council's element.
- £0.09 million overstatement of cash due to the bank reconciliation being performed incorrectly.
- £0.10 million overstatement of investment properties due to issues identified in the fixed asset register.

There were no uncorrected misstatements.

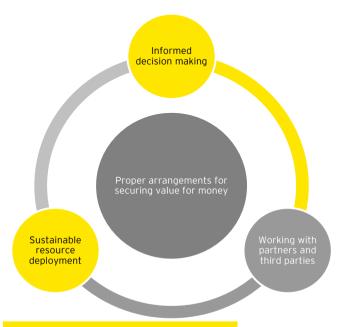
We have included a list of the disclosure differences identified below. These have been corrected by management:

- Contents incomplete and references to prior year.
- Narrative Report two sections of the CIPFA Code of Practice Guidance omitted, borrowings and pensions.
- Expenditure and Funding Analysis this note required additional disclosure in line with the Code.
- ▶ Note 4 Assumptions made about the Future and Other Major Sources of Estimation Uncertainty sensitivity analysis required context.
- ▶ Note 22 Leases Minimum lease payments disclosure updated from £4,398 to £43,975.
- Note 22 Leases Incorrect figure used for other land and buildings finance lease total.
- ▶ Note 23 Investment Properties comparator figures incorrectly omitted.
- ► Note 29 Short-term Receivables figure incorrectly typed should be £6,306k not £6,236k.
- Collection Fund classification difference between bad debt provision and write offs of uncollectable amounts
- Post Balance Sheet Events separate note is required.

There were no uncorrected disclosure misstatements.



Value for Money



Economy, efficiency and effectiveness

We must consider whether you have 'proper arrangements' to secure economy, efficiency and effectiveness in your use of resources. This is known as our value for money conclusion.

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

- take informed decisions;
- deploy resources in a sustainable manner; and
- work with partners and other third parties.

In considering your proper arrangements, we use the CIPFA/SOLACE framework for local government to ensure that our assessment is made against an already existing mandatory framework which you use in documents such as your Annual Governance Statement.

Overall conclusion

We identified one significant risk around these arrangements. The table below present our findings in response to the risk in our Audit Plan and any other significant weaknesses or issues we want to bring to your attention.

We expect having no matters to report about your arrangements to secure economy, efficiency and effectiveness in your use of resources.

VFM Risk

We are only required to determine whether there is any risk that we consider significant within the Code of Audit Practice, where risk is defined as: "A matter is significant if, in the auditor's professional view, it is reasonable to conclude that the matter would be of interest to the audited body or the wider public"

Our risk assessment supports the planning of enough work to deliver a safe conclusion on your arrangements to secure value for money, and enables us to determine the nature and extent of any further work needed. If we do not identify a significant risk we do not need to carry out further work.

The table below presents the findings of our work in response to the risk area in our Audit Plan.

What is the significant VFM risk?

Arrangements this impacts?

What are our findings?

Sustainable resource deployment: Financial resilience – achievement of savings needed over the medium term

In the Council's medium term financial strategy (MTFS), approved in February 2016 and the Budget report for December 2016, the Council identified a cumulative budget gap of £3.8 million over the next three years.

The Council has updated their budget as at February 2017 reporting a three year budget deficit of £3.2m

The MTFS is based on a number of assumptions, including an estimate of the future levels of Government funding. Any reduction in Government funding in future years, together with an increased use of reserves represents a risk to achievement of the Council's future budgets.

- Taking informed decisions
- Deploying resources in a sustainable manner

We have undertaken the procedures as set out in our audit strategy which have focused on:

- ► The Council's historic financial performance, including its ability to deliver challenging savings targets;
- The Council's current financial standing;
- The Council's processes for setting its budget, and the nature of the budget assumptions;
- The competency of the Council's finance team: and
- ► The political stability of the Council.

The Council currently has a good level of un-earmarked general fund reserves (£8.8 million at 31 March 2017), which are above the minimum levels range set by the Council's $\rm s151$ officer. The current level of reserves is expected to reduce as it includes an allocation for a one-off payment to the Pension Fund in 2017/18 and to smooth the planned approach to cost reductions over the medium term. These provide the Council with the flexibility to manage its financial position over the short-to-medium term, including making a one-off payment to the Pension Fund and for the Council's planned approach to cost reductions.

The Council also has in place substantial levels of earmarked reserves (£20.5 million at 31 March 2017). These have been established for a number of purposes, including the financial consequences of matters that have not yet arisen or to fund specific service areas/projects. The existence of these reserves provides further evidence of the Council's prudent approach to financial management.

Our review of the budget setting process, assumptions used in financial planning, in year financial monitoring, and the Council's history of delivery has not identified any significant matters that we wish to report to you. Therefore, based on the known information as at the end of the financial year, we assess the Council to have adequate arrangements.





Other reporting issues

Other reporting issues

Consistency of other information published with the financial statements, including the Annual Governance Statement

We must give an opinion on the consistency of the financial and non-financial information in the Borough Council of King's Lynn and West Norfolk Statement of Accounts 2016/17 with the audited financial statements

We must also review the Annual Governance Statement for completeness of disclosures, consistency with other information from our work, and whether it complies with relevant guidance.

Our findings are:

- Financial information within the Narrative Report and published with the financial statements was consistent with the Annual Accounts.
- We have reviewed the Annual Governance Statement and can confirm that, following the minor amendments made, it is consistent with other information that we are aware of from our audit of the financial statements.

We have no other matters to report.

Whole of Government Accounts

Alongside our work on the financial statements, we also review and report to the National Audit Office on your Whole of Government Accounts return. The extent of our review, and the nature of our report, is specified by the National Audit Office.

The Authority falls below the £350 million threshold for a full review, so we have undertaken the limited procedures that are required. We have concluded our work in this area and have no matters to report to the Audit Committee.



Other reporting issues

Other reporting issues

Other powers and duties

We have a duty under the Local Audit and Accountability Act 2014 to consider whether to report on any matter that comes to our attention in the course of the audit, either for the Authority to consider it or to bring it to the attention of the public (i.e. "a report in the public interest").

We did not identify any issues which required us to issue a report in the public interest.

We also have a duty to make written recommendations to the Authority, copied to the Secretary of State, and take action in accordance with our responsibilities under the Local Audit and Accountability Act 2014.

We did not identify any issues.

Other matters

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Authority's financial reporting process. They include the following:

- Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- Any significant difficulties encountered during the audit;
- Any significant matters arising from the audit that were discussed with management;
- Written representations we have requested;
- Expected modifications to the audit report;
- ► Any other matters significant to overseeing the financial reporting process;
- Related parties;
- External confirmations;
- ► Going concern;
- Consideration of laws and regulations; and
- ► Group audits

We have no matters to report.





07

Assessment of Control Environment

Assessment of Control Environment

Assessment of control environment

Financial controls

It is the responsibility of the Authority to develop and implement systems of internal financial control and to put in place proper arrangements to monitor their adequacy and effectiveness in practice. Our responsibility as your auditor is to consider whether the Authority has put adequate arrangements in place to satisfy itself that the systems of internal financial control are both adequate and effective in practice.

As part of our audit of the financial statements, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed.

In accordance with our Audit Plan we have performed a fully substantive audit and have not performed detailed testing on the operation of key financial controls.

Although our audit was not designed to express an opinion on the effectiveness of internal control we are required to communicate to you significant deficiencies in internal control.

We have not identified any significant deficiencies in the design or operation of an internal control that might result in a material misstatement in your financial statements of which you are not aware.





Required communications with the Audit Committee

There are certain communications that we must provide to the Audit Committees of UK clients. We have done this by:

		Our Reporting to you
Required communications	What is reported?	When and where
Terms of engagement	Confirmation by the Audit Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies.
Planning and audit approach	Communication of the planned scope and timing of the audit, including any limitations.	February 2017 Audit Plan
Significant findings from the audit	 Our view of the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures Any significant difficulties encountered during the audit Any significant matters arising from the audit that were discussed with management Written representations we have requested Expected modifications to the audit report Any other matters significant to overseeing the financial reporting process 	July 2017 Audit Results Report
Going concern	Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including: ► Whether the events or conditions constitute a material uncertainty ► Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements ► The adequacy of related disclosures in the financial statements	No conditions or events were identified, either individually or together to raise any doubt about Borough Council of King's Lynn and West Norfolk's ability to continue for the 12 months from the date of our report.
Misstatements	 Uncorrected misstatements and their effect on our audit opinion The effect of uncorrected misstatements related to prior periods A request that any uncorrected misstatement be corrected Significant corrected misstatements, in writing 	July 2017 Audit Results Report



		Our Reporting to you
Required communications	What is reported?	When and where
Fraud	 Asking the Audit Committee whether they have knowledge of any actual, suspected or alleged fraud affecting the Authority Unless all those charged with governance are involved in managing the entity, any fraud identified or information obtained indicating that a fraud may exist involving: (a) management; (b) employees with significant roles in internal control; or (c) others where the fraud results in a material misstatement in the financial statements. A discussion of any other matters related to fraud, relevant to Audit Committee responsibility. 	We have asked management and those charged with governance about arrangements to prevent or detect fraud. We have not become aware of any fraud or illegal acts during our audit.
Related parties	Significant matters arising during the audit in connection with the Authority's related parties including, where applicable: ► Non-disclosure by management ► Inappropriate authorisation and approval of transactions ► Disagreement over disclosures ► Non-compliance with laws and/or regulations ► Difficulty in identifying the party that ultimately controls the entity	We have no matters to report.
Subsequent events	► Where appropriate, asking the Audit Committee whether any subsequent events have occurred that might affect the financial statements.	We have asked management and those charged with governance. We have no matters to report.
Other information	► Where material inconsistencies are identified in other information included in the document containing the financial statements, but management refuses to make the revision.	July 2017 Audit Results Report
External confirmations	 Management's refusal for us to request confirmations We were unable to obtain relevant and reliable audit evidence from other procedures. 	At the time of writing this report we are awaiting some external confirmations in relation to cash, investments and borrowings. We will provide you with an update at the Audit Committee on 31 July 2017.



		Our Reporting to you
Required communications	What is reported?	When and where
Consideration of laws and/or regulations	 Audit findings of non-compliance where it is material and believed to be intentional. This communication is subject to compliance with legislation on "tipping off" Asking the Audit Committee about possible instances of non-compliance with laws and/or regulations that may have a material effect on the financial statements, and known to the Audit Committee. 	We have asked management and those charged with governance. We have not identified any material instances or noncompliance with laws and regulations.
Significant deficiencies in internal controls identified during the audit	► Significant deficiencies in internal controls identified during the audit.	July 2017 Audit Results Report
Group Audits	 An overview of the type of work to be performed on the financial information of the components An overview of the group audit team's planned involvement in the component auditors' work on the financial information of significant components Instances where the group audit team's evaluation of a component auditor's work of gave rise to a concern about its quality Any limitations on the group audit, for example, where the group engagement team's access to information may have been restricted Fraud or suspected fraud involving group or component management, employees with significant roles in group-wide controls, or others where the fraud resulted in a material misstatement of the group financial statements. 	February 2017 Audit Plan July 2017 Audit Results Report
Independence	Communication of all significant facts and matters that have a bearing on EY's objectivity and independence. Communicating key elements of the audit engagement partner's consideration of independence and objectivity such as: ► The principal threats ► Safeguards adopted and their effectiveness ► An overall assessment of threats and safeguards ► Information on the firm's general policies and processes for maintaining objectivity and independence Communications whenever significant judgments are made about threats to objectivity or independence and the appropriateness of safeguards.	February 2017 Audit Plan July 2017 Audit Results Report



		Our Reporting to you
Required communications	What is reported?	When and where
Fee Reporting	Breakdown of fee information when the audit plan is agreed Breakdown of fee information at the completion of the audit Any non-audit work	February 2017 Audit Plan July 2017 Audit Results Report
Certification work	Summary of certification work	Certification Report



Appendix B

Independence



We confirm that there are no changes in our assessment of independence since our confirmation in our audit planning board report dated 13 January 2017.

We complied with the APB Ethical Standards and the requirements of the Public Sector Audit Appointment's (PSAA) Terms of Appointment. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning of regulatory and professional requirements.

We consider that our independence in this context is a matter which you should review, as well as us. It is important that you **and your Audit Committee** consider the facts known to you and come to a view. If you would like to discuss any matters concerning our independence, we will be pleased to do this at the meeting of the Audit Committee on 31 July 2017.

We confirm we plan to undertake no non-audit work outside the PSAA Code requirements.

As part of our reporting on our independence, we set out below a summary of the fees paid for the year ended 31 March 2017.

	Planned Fee 2016/17 £'s	Scale Fee 2016/17 £'s	Final Fee 2015/16 £'s
Total Audit Fee - Code work	51,291 (See Note 1)	51,291	54,289
Total audit fee - Certification of claims and returns (Note 2)	23,460	23,460	19,602

Note 1: We need to review our costs before reporting formally agreeing the final fee with you. We have performed additional audit work is in relation to the following areas, which may lead to a variation to the planned fee:

- The expenditure and funding analysis, additional audit work in relation to the standard of the Council's supporting working papers, given the dry run approach taken to the achieving the early close deadlines;
- ► The Council produces consolidated financial statements which in prior years have incurred a scale fee variation to reflect the additional work required for the consolidation including instructing and relying upon the component auditor and in reviewing the disclosures required to meet the group consolidation requirements of the Code of Practice and International Accounting Standards. This will incur an additional fee of £3.000.

Note 2: The planned fee for the certification of housing benefit subsidy is based on the programme of work carried out in 2014/15.

We will confirm our final fees following the completion of our audit and non-audit work and report this within our Annual Audit Letter and Annual Certification Report.



Appendix C

Accounting and regulatory update

Accounting update

Since the date of our last report to the Audit Committee, new accounting standards and interpretations have been issued. The following table provides a high level summary of those that have the potential to have the most significant impact on you:

Name	Summary of key measures	Impact on Borough Council of King's Lynn and West Norfolk
IFRS 9 Financial Instruments	Applicable for local authority accounts from the 2018/19 financial year and will change: How financial assets are classified and measured How the impairment of financial assets are calculated Financial hedge accounting The disclosure requirements for financial assets. Transitional arrangements are included within the accounting standard, however as the 2018/19 Accounting Code of Practice for Local Authorities has yet to be issued it is unclear what the impact on local authority accounting will be and whether any accounting statutory overrides will be introduced to mitigate any impact.	Although some initial thoughts on the approach to adopting IFRS 9 have been issued by CIPFA, until the Code is issued and any statutory overrides are confirmed there remains some uncertainty. However, what is clear is that the Council will have to: Reclassify existing financial instrument assets Re-measure and recalculate potential impairments of those assets; and Prepare additional disclosure notes for material items
IFRS 15 Revenue from Contracts with Customers	Applicable for local authority accounts from the 2018/19 financial year. This new standard deals with accounting for all contracts with customers except: - Leases; - Financial instruments; - Insurance contracts; and - for local authorities; Council Tax and NDR income. The key requirements of the standard cover the identification of performance obligations under customer contracts and the linking of income to the meeting of those performance obligations. There are transitional arrangements within the standard; however as the 2018/19 Accounting Code of Practice for Local Authorities has yet to be issued it is unclear what the impact on local authority accounting will be.	As with IFRS 9, some initial thoughts on the approach to adopting IFRS 15 have been issued by CIPFA. However, until the Code is issued there remains some uncertainty. However, what is clear is that for all material income sources from customers the Council will have to: Disaggregate revenue into appropriate categories Identify relevant performance obligations and allocate income to each Summarise significant judgements



Appendix C

Name	Summary of key measures	Impact on Borough Council of King's Lynn and West Norfolk
IFRS 16 Leases	IFRS 16 will be applicable for local authority accounts from the 2019/20 financial year. Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease in a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet. There are transitional arrangements within the standard, although as the 2019/20 Accounting Code of Practice for Local Authorities has yet to be issued it is unclear what the impact on local authority accounting will be or whether any statutory overrides will be introduced.	Until the 2019/20 Accounting Code is issued and any statutory overrides are confirmed there remains some uncertainty in this area. However, what is clear is that the Council will need to undertake a detailed exercise to classify all of its leases and therefore must ensure that all lease arrangements are fully documented.
Earlier deadline for production and audit of the financial statements from 2017/18	The Accounts and Audit Regulations 2015 introduced a significant change in statutory deadlines from the 2017/18 financial year. From that year the timetable for the preparation and approval of accounts will be brought forward with draft accounts needing to be prepared by 31 May and the publication of the audited accounts by 31 July.	The Council has implemented a dry-run for 2016/17 and subject to the outstanding matters raised elsewhere in this report, we are proposing to issue our audit report by the 31 July 2017. However, the draft accounts were submitted for audit 2 weeks after the planned submission date and did not meet the 31 May target date. There are a number of areas where the closedown processes can be further improved going forward. However, we do not expect the formal earlier deadline to pose a significant issue for the Council.





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13 July 2017

Ref: Your ref:

Direct line: 01223 394547

Email: MHodgson@uk.ev.com

Lorraine Gore
Executive Director Finance
Borough Council of King's Lynn & West Norfolk
Kings Court
Chapel Street
King's Lynn
Norfolk

Dear Lorraine,

PF30 1FX

Borough Council of Kings Lynn & West Norfolk – 2016/17 financial year Request for a letter of representation

International Standards on Auditing set out guidance on the use by auditors of management representations (ISA (UK&I) 580) and on possible non-compliance with laws and regulations (ISA (UK&I) 250). I have interpreted this guidance as it affects Local Government bodies and I expect the following points to apply:

- auditors may wish to obtain written representation where they are relying on management's representations in respect of judgemental matters (for example the level of likely incidence of a claim), which may not be readily corroborated by other evidence;
- · auditors are likely to request written representations on the completeness of information provided;
- auditors may wish to obtain written representation on issues other than those directly related to the Statement of Accounts;
- · the letter is dated on the date on which the auditor signs the opinion and certificate;
- · the letter is signed by the person or persons with specific responsibility for the financial statements; and
- the letter is formally acknowledged as having been discussed and approved by the Audit Committee, as those charged with governance of the Council.

I would expect the letter of representation to include the following matters.





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General statement

That the letter of representations is provided in connection with our audit of the financial statements of Borough Council of Kings Lynn & West Norfolk ("the Group and Council") for the year ended 31 March 2017.

That you recognise that obtaining representations from you concerning the information contained in this letter is a significant procedure in enabling us to form an opinion as to whether the financial statements give a true and fair view of the Council financial position of Borough Council of Kings Lynn & West Norfolk as of 31 March 2017 and of its income and expenditure for the year then ended in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.

You understand that the purpose of our audit of your financial statements is to express an opinion thereon and that our audit is conducted in accordance with International Standards on Auditing (UK and Ireland), which involves an examination of the accounting system, internal control and related data to the extent we considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, you make the following representations, which are true to the best of your knowledge and belief, having made such inquiries as you considered necessary for the purpose of appropriately informing ourselves:

A. Financial Statements and Financial Records

- That you have fulfilled your responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with, for the Group and Council the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.
- 2. That you acknowledge as members of management of the Group and Council, your responsibility for the fair presentation of the consolidated and council financial statements. We believe the consolidated and council financial statements referred to above give a true and fair view of the financial position, financial performance (or results of operations) and cash flows of the Group and Council in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 and are free of material misstatements, including omissions. We have approved the consolidated and council financial statements.





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- You confirm that the Responsible Officer has:
 - Reviewed the accounts
 - Reviewed all relevant written assurances relating to the accounts, and
 - Made other enquiries as appropriate.
- That the significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.
- As members of management of the Council, we believe that the Council has a system of internal controls adequate to enable the
 preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting
 in the United Kingdom 2016/17, that are free from material misstatement, whether due to fraud or error.

B. Fraud

- You acknowledge that you are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud
- You have disclosed to us the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- 3. That you have no knowledge of any fraud or suspected fraud involving management or other employees who have a significant role in the Group or Council's internal controls over financial reporting. In addition, you have no knowledge of any fraud or suspected fraud involving other employees in which the fraud could have a material effect on the financial statements.

You have no knowledge of any allegations of financial improprieties, including fraud or suspected fraud, (regardless of the source or form and including without limitation, any allegations by "whistleblowers") which could result in a misstatement of the financial statements or otherwise affect the financial reporting of the Group or Council.





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C. Compliance with Laws and Regulations

- You have disclosed to us all known actual or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.
- D. Information Provided and Completeness of Information and Transactions
- 1. You have provided us with:
 - Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters as agreed in terms of the audit engagement.
 - · Additional information that we have requested from us for the purpose of the audit; and
 - Unrestricted access to persons within the entity from whom we determined it necessary to obtain audit evidence.
- That all material transactions have been recorded in the accounting records and are reflected in the financial statements.
- That you have made available to us all minutes of the meetings of the Council and its relevant committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year to the most recent meeting on the following date: 31 July 2017.
- 4. That you confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Council related parties and all related party relationships and transactions of which you are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the financial statements.
- That you believe that the significant assumptions you used in making accounting estimates, including those measured at fair value, are reasonable.





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That you have disclosed to us, and the Group and Council has complied with, all aspects of contractual agreements that could have a
material effect on the financial statements in the event of non-compliance, including all covenants, conditions or other requirements of
all outstanding debt.

E. Liabilities and Contingencies

- All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to us and are appropriately reflected in the financial statements.
- That you have informed us of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
- That you have recorded and/or disclosed, as appropriate, all liabilities related litigation and claims, both actual and contingent, and have disclosed in the financial statements all guarantees that you have given to third parties.

F. Subsequent Events

 That other than described in Note 4 to the Group and Council's financial statements, there have been no events subsequent to period end which require adjustment of or disclosure in the financial statements or notes thereto.

G. Accounting Estimates

- 1. That you believe that the significant assumptions you used in making accounting estimates, including those measured at fair value, are reasonable.
- 2. In respect of accounting estimates recognised or disclosed in the financial statements:
 - That you believe the measurement processes, including related assumptions and models, you used in determining accounting
 estimates is appropriate and the application of these processes is consistent.
 - That the disclosures relating to accounting estimates are complete and appropriate in accordance with the applicable financial reporting framework.
 - That the assumptions you used in making accounting estimates appropriately reflects your intent and ability to carry out specific courses of action on behalf of the entity, where relevant to the accounting estimates and disclosures.





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 That no subsequent event requires an adjustment to the accounting estimates and disclosures included in the financial statements.

H. Group audits

- That there are no significant restrictions on your ability to distribute the retained profits of the Group because of statutory, contractual, exchange control or other restrictions other than those indicated in the Group financial statements.
- That the necessary adjustments have been made to eliminate all material intra-group unrealised profits on transactions amongst council, subsidiary undertakings and associated undertakings.
- 3. You confirm that entities excluded from the consolidated financial statements are immaterial on a quantitative and qualitative basis.

I. Expenditure Funding Analysis

- That you have reviewed the new requirements (as set out in the CIPFA LASAAC Code of Practice on Local Authority Accounting in
 the United Kingdom 2016/17), in relation to the preparation of the Expenditure Funding Analysis to replace the previous segmental
 reporting analysis, and confirm that all required amendments to the Comprehensive Income and Expenditure Statement and
 Movement in Reserves Statement, as well as the requirements to prepare the Expenditure Funding Analysis and related notes have
 been correctly reflected in the financial statements, including retrospectively reflecting this in the financial statements.
- 2. You confirm that the financial statements reflect the operating segments reported internally to the Council.

J. Going Concern

 That you have made us aware of any issues that are relevant to the Group and Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

K. Ownership of Assets

 That except for assets capitalised under finance leases, the Group and Council has satisfactory title to all assets appearing in the balance sheet(s), and there are no liens or encumbrances on the Group and Council's assets, nor has any asset been pledged as collateral. All assets to which the Group and Council has satisfactory title appear in the balance sheet(s).





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L. Reserves

- 1. You have properly recorded or disclosed in the consolidated and council financial statements the useable and unusable reserves.
- M. Valuation of Property, Plant and Equipment Assets
- You believe that the measurement processes, including related assumptions and models, used to determine the accounting estimate(s)
 have been consistently applied and are appropriate in the context of the CIPFA LASAAC Code of Practice on Local Authority Accounting
 in the United Kingdom 2016/17.
- You confirm that the significant assumptions used in making the valuation of assets appropriately reflect your intent and ability to carry out specific courses of action on behalf of the entity.
- You confirm that the disclosures made in the consolidated and council financial statements with respect to the accounting estimate(s)
 are complete and made in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom
 2016/17
- You confirm that no adjustments are required to the accounting estimate(s) and disclosures in the consolidated and council financial statements due to subsequent events.
- You confirm that you have performed a desktop review of all assets not subject to revaluation as part of the 5 year rolling programme for valuations and that each asset category is not materially misstated.
- 6. You confirm that for assets carried at historic cost, that no impairment is required.

N. Retirement benefits

That on the basis of the process established by you and having made appropriate enquiries, you are satisfied that the actuarial
assumptions underlying the scheme liabilities are consistent with your knowledge of the business. All significant retirement benefits and
all settlements and curtailments have been identified and properly accounted for.





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P. Specific Representations

We do not require any specific representations in addition to those above.

I would be grateful if you could provide a letter of representation, which is appropriately signed and dated (by the s151 officer and Chair of Audit Committee) on the proposed audit opinion date (currently 31 July 2017) on formal headed paper.

Yours sincerely

Mark Hodgson Executive Director Ernst & Young LLP United Kingdom

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ED None

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