Audit and Inspection Plan

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Ribble Valley Borough Council

Audit 2008/09

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

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

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

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

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

Document Control

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Status of our reports

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

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

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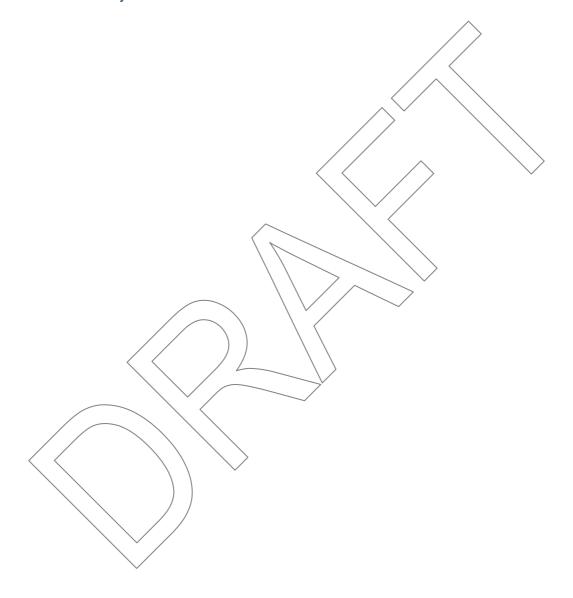
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Contents

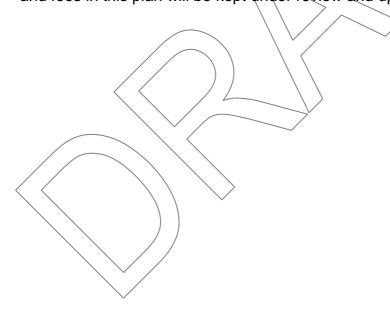
Introduction	5
Responsibilities	6
Fees	7
Specific actions Ribble Valley Borough Council could take to reduce its audit fees	8
Process for agreeing any changes in audit fees	8
Auditor's report on the financial statements	9
Financial statements	9
VFM conclusion	9
Use of Resources 2007/08	10
Use of resources 2008/09	10
Mandated work	11
CPA and inspection	12
Advice and assistance	14
The audit and inspection team	15
Quality of service	15
Planned outputs	16
Appendix 1 – Elements of our work	17
Financial statements	17
Value for money conclusion	17
Use of resources assessment 2007/08	17
Use of resources assessment 2008/09	18
Data quality 2007/08	19
Whole of government accounts	19
National Fraud Initiative	19
Certification of grant claims and returns	19
Appendix 2 – Basis for fee	20
Assumptions	20

Appendix 3 – Initial risk assessment – Use of resources and VFM	
conclusion	22
Appendix 4 – Independence and objectivity	24
Appendix 5 – Working together	26
Meetings	26
Sustainability	27



Introduction

- 1 This plan sets out the work your audit team proposes to undertake for the 2008/09 financial year. The plan is based on the Audit Commission's risk-based approach to audit planning and the requirements of moving towards Comprehensive Area Assessment (CAA). It reflects:
 - audit and inspection work specified by the Audit Commission for 2008/09;
 - current national risks relevant to your local circumstances; and
 - your local risks and improvement priorities.
- 2 In April 2008, Tom Keena was appointed as the Comprehensive Area Assessment Lead (CAAL) for Lancashire. The CAAL will provide the focal point for the Commission's work in your local area, lead the CAA process, and ensure that the combined inspection programme across all inspectorates is tailored to the level and nature of risk for the area and its constituent public bodies. The Commission has become the statutory gatekeeper of all inspection activity involving local authorities.
- 3 Pricewaterhouse Coopers are the council's auditor for 2007/08. As the audit for 2007/08 is not yet completed, the audit planning process for 2008/09, including the risk assessment, will continue as the year progresses, and the information and fees in this plan will be kept under review and updated as necessary.



Responsibilities

- 4 The Audit Commission's Statement of Responsibilities of Auditors and of Audited Bodies (from April 2008) sets out the respective responsibilities of the auditor and the Council. The Audit Commission has issued a copy of the Statement to every audited body.
- 5 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end and our audit work is undertaken in the context of these responsibilities.
- 6 I comply with the statutory requirements governing our audit and inspection work, in particular:
 - the Audit Commission Act 1998;
 - the Local Government Act 1999; and
 - the Code of Audit Practice.
- 7 The Code of Audit Practice (the Code) defines auditors' responsibilities in relation to:
 - the financial statements (including the annual governance statement); and
 - the audited body's arrangements for securing economy, efficiency and effectiveness in its use of resources.



Fees

- The details of the structure of scale fees are set out in the Audit Commission's work programme and fee scales 2008/09. Scale fees are based on a number of variables, including the type, size and location of the audited body.
- 9 The total indicative fee for the audit and inspection work included in this audit and inspection plan for 2008/09 is for £95,831.
- 10 A summary of this is shown in the table below. The fee is determined by audit risks identified, mandated work and basic assumptions. A detailed breakdown of the audit and inspection fee is included in Appendix 2.

Tab	1 1	Audit fee
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Audit area	Planned fee 2008/09	Planned/Actual fee 2007/08	Page
Total audit fee	89,859 **	80,000	
Total inspection fee	5,972	5,899	
Certification of claims and returns	28,000	32,000	
Advice regarding housing stock transfer		110,207	

- ** £25.000 relates to 2007/08 Use of Resources and Data Quality work carried out by PwC.
- 11 The Audit Commission scale fee for Ribble Valley Council is £84,307 (£75,000 + 0.047% of gross expenditure) The fee proposed for 2008/09 is + 6.6 per cent compared to the scale fee and is within the normal level of variation specified by the Commission.
- 12 In setting the fee, we have assumed that:
 - the level of risk in relation to the audit of the financial statements is not significantly different to that identified for 2007/08;
 - internal audit undertakes appropriate work on all systems; and
 - good quality working papers and records will be provided to support the financial statements by 30 June 2009.

Further details of the assumptions are outlined in Appendix 2.

- The Audit Commission has the power to determine the fee above or below the scale fee where it considers that substantially more or less work is required than envisaged by the scale fee. The Audit Commission may, therefore, adjust the scale fee to reflect the actual work that needs to be carried out to meet the auditor's statutory responsibilities, on the basis of the auditor's assessment of risk and complexity at a particular body.
- It is a matter for the auditor to determine the work necessary to complete the audit and, subject to approval by the Audit Commission, to seek to agree an appropriate variation to the scale fee with the Council. The Audit Commission expects normally to vary the scale fee by no more than 30 per cent (upwards or downwards). This fee then becomes payable.
- The fee for 2008/09 includes work in relation to the Council's arrangements for implementing and embedding policies around diversity and equality throughout the organisation. The fee for this piece of work amounts to £6,999 and is detailed in appendix 2.

Specific actions Ribble Valley Borough Council could take to reduce its audit fees

- The Audit Commission requires its auditors to inform a council of specific actions it could take to reduce its audit fees. We have identified the following actions Ribble Valley Borough Council could take:
 - Internal audit should document and test all material systems annually in line with the audit requirements under the International Standards of Auditing;
 - Officers should provide good quality working papers to support the accounts;
 - Comprehensive self assessments and supporting evidence should be provided for use of resources.

Process for agreeing any changes in audit fees

As set out in paragraph 4, we expect that the initial risk assessment may change as the year progresses. Where this is the case, we will discuss this in the first instance with the Director of Resources. Supplements to the plan will be issued to record any revisions to the risk and the impact on the fee.

Auditor's report on the financial statements

- 18 We are required to issue an audit report giving our:
 - opinion on whether the financial statements present fairly the financial position of the Council as at 31 March 2009; and
 - conclusion on whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

Financial statements

19 We have not undertaken a risk assessment for our audit of the financial statements as many of the specific risks may become apparent after PwC have completed the 2007/08 audit. A separate opinion plan for the audit of the financial statements will be issued in December 2008.

VFM conclusion

- 20 In reaching our conclusion, we will review evidence that is relevant to the Council's performance management and financial management arrangements.
- 21 The key risks highlighted from the planning are summarised in the table below with details of planned work to mitigate the risks. Full details of the risk assessment are outlined in Appendix 3.

Table 2 Key risks identified

Key risks identified	Planned work to address the risk
New areas to be assessed and/or revised focus under the revised use of resources arrangements, which impact on the VFM conclusion.	More detailed focus of our use of resources work on these areas.
The planned implementation of international financial reporting standards to local government accounts from 2010/11 will require careful forward planning to ensure that the relevant information is readily available at the time to enable an efficient transition to the new financial reporting requirements.	We will liaise with key finance staff on the key changes required and the plans in place to address them. We will share any 'good' practice or other sources of advice as they become available.

Use of Resources 2007/08

- This audit plan covers the last year of the current regime for Use of Resources assessment as part of the CPA framework. The work required to arrive at the 2007/08 Use of Resources assessment is fully aligned to that required to arrive the auditor's 2007/08 Value for Money conclusion.
- 23 Appendix 1 outlines the criteria and scoring.
- The initial risk assessment for use of resources work has been completed by Pricewaterhouse Coopers and as outgoing auditors, PwC will undertake the Use of Resources audit work.

Use of resources 2008/09

- The Audit Commission has specified that auditors will complete a new use of resources assessment for 2008/09. This will be a new assessment forming part of the CAA framework for 2009. It will also completely align with the VFM criteria for 2008/09.
- The Commission proposes that the approach to the new use of resources assessment will be focussed on three themes. Appendix 1 outlines the criteria. The detailed Key Lines of Enquiry were issued in May 2008 together with the proposed cyclical approach to the review of the new key lines of enquiry. This plan and fee includes an element of time to enable us to begin looking at some of the newer areas introduced into the assessment. These include a greater focus on natural resources, strategic asset management and commissioning and procurement.

Mandated work

- As part of the audit, the mandated work programme comprises: 27
 - data quality for 2007/08; and
 - whole of government accounts.

Appendix 1 highlights the work to be undertaken.

The work in relation to data quality will again be undertaken by your outgoing 28 auditors Pricewaterhouse Coopers.



CPA and inspection

- From April 2009, the Audit Commission, jointly with the other public service inspectorates, will be implementing Comprehensive Area Assessment (CAA). Therefore, 2008/09 is the last year in which corporate assessments and programme service inspections will be undertaken as part of the CPA framework.
- The Audit Commission's CPA and inspection activity is underpinned by the principle of targeting our work where it will have the greatest effect, based upon assessments of risk and performance.
- The Council's CPA category is, therefore, a key driver in the Commission's inspection planning process. In 2004 Ribble Valley was assessed as a 'Fair' council. The Council was reassessed in 2008 and has made progress in a number of areas to achieve a 'Good' rating.
- The performance of the Council is set out in detail in the Audit Commission's report issued in May 2008. Some of the key strengths and areas for improvement in the Council's performance from the report are set out below.
- 33 Strengths in the Council's performance include:
 - A clear strategic vision for the community supported by engagement with partners and consultation with communities and stakeholders;
 - Clear priorities underpin corporate and service plans. These plans are progressively becoming aligned with financial planning in the short and medium term;
 - Delivery of ambitions and priorities has progressed well resulting in high levels of user satisfaction with the Council and its services; and
 - Good progress has been made in a number of areas including reducing the levels and fear of crime among residents, improving the standard of housing and reducing homelessness.
- 34 Areas for improvement in the Council's performance include:
 - Prioritise and fully integrate the equality and diversity agenda within service planning and delivery. Progress has been slow to date and improvement is needed to ensure decision making and service delivery fully reflect the diversity of the community;
 - Strengthen monitoring and evaluation arrangements for partnerships to ensure they are managed effectively and impact can be clearly assessed;
 - Stronger frameworks are needed for training and development and workforce planning to enhance capacity and support strategic and operational delivery; and
 - The Council's strategic approach could be improved by developing long term outcome focussed targets linked to its vision, clarifying accountabilities and improving scrutiny of priorities.

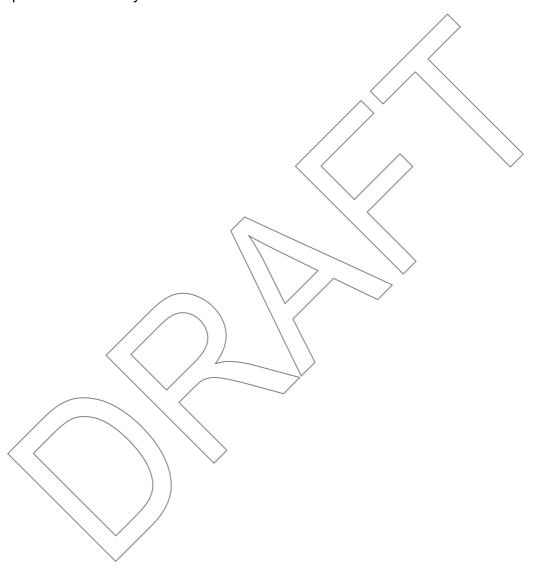
35 On the basis of the planning process, I have identified where inspection activity will be focused for 2008/09 as follows.

Summary of inspection activity Table 3

Inspection activity	Reason/impact
Comprehensive Area Assessment (CAAL) role	To act as the Commission's primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Direction of Travel (DoT) assessment	An annual assessment, carried out by the RM, of how well the Council is securing continuous improvement. The DoT statement will be reported in the Annual Audit and Inspection Letter. The DoT assessment summary will be published on the Commission's website.
Diversity and Equality	Review of the Council's arrangements to integrate the equality and diversity agenda into service planning and delivery and to review the process for ensuring diversity and equality considerations are fully embedded into the decision making process.

Advice and assistance

- 36 Under paragraph 9 of Schedule 2A of the Audit Commission Act 1998 we have powers to provide 'advice and assistance' (A&A) to another public body where this is requested.
- 37 If you wish the Commission to provide additional services under these powers, please contact myself.



The audit and inspection team

The key members of the audit and inspection team for the 2008/09 audit are shown in the table below.

Audit and inspection team Table 4

Name	Contact details	Responsibilities
Tom Keena CAAL	t-keena@audit- commission.gov.uk 0844 798 7338	The primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.
Clive Portman District Auditor	c-portman@audit- commission.gov.uk 0844 798 7038	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive and audit committee.
Georgia Jones Audit Manager	georgia- jones@audit- commission.gov.uk 0844 798 4827	Manages and co-ordinates the different elements of the audit work. Key point of contact for the Director of Finance.

Quality of service

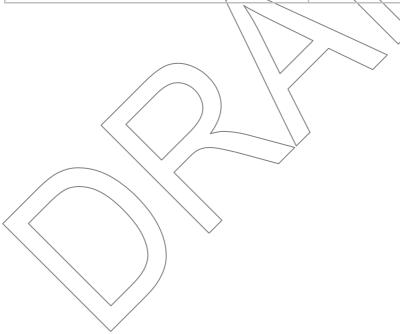
- We are committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact me in the first instance. Alternatively, you may wish to contact the Northern Region Head of Operations, Terry Carter.
- 40 If we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

Planned outputs

41 Reports will be discussed and agreed with the appropriate officers before being issued to the Accounts and Audit committee.

Table 5 Planned outputs

Planned output	Indicative date
Opinion Audit Plan	December 2008
Annual governance report	September 2009
Auditor's report giving an opinion on the financial statements	September 2009
Final accounts memorandum	Øctøber 2009
Use of resources report	October 2009
Inspection reports – Diversity & Equality	TBC
Annual Audit and Inspection Letter	TBC



Appendix 1 – Elements of our work

Financial statements

- 1 We will carry out our audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).
- 2 We are required to issue an opinion on whether the financial statements present fairly, in accordance with applicable laws and regulations and the Statement of Recommended Practice on Local Authority Accounting in the United Kingdom 2008, the financial position of the Council as at 31 March 2009 and its income and expenditure for the year.
- 3 We are also required to review whether the Annual Governance Statement has been presented in accordance with relevant requirements, and to report if it does not meet these requirements or if the Annual Governance Statement is misleading or inconsistent with our knowledge of the Council.

Value for money conclusion

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

Use of resources assessment 2007/08

- 7 The Use of Resources themes and KLOEs are outlined below.
- 8 The work required to arrive at the use of resources assessment is fully aligned with that required to arrive at the auditor's value for money conclusion. It has therefore been decided where external audit providers are changing this work will be carried out by the outgoing auditor. Pricewaterhouse Coppers will, therefore, undertake this work.
- 9 They will arrive at a score of 1 to 4, based on underlying key lines of enquiry, for each of the following themes:

Theme	Description
Financial reporting	preparation of financial statementsexternal reporting
Financial management	medium-term financial strategybudget monitoringasset management
Financial standing	managing spending within available resources
Internal control	 risk management system of internal control probity and propriety
Value for money	 achieving value for money managing and improving value for money

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

Use of resources assessment 2008/09

- The Commission has now consulted on its proposals for the 2008/09 Use of Resources assessment. It proposes that the work required to arrive at the 2008/09 use of resources assessment is fully aligned with that required to arrive at the auditor's 2008/09 value for money conclusion. An element of the 2008/09 assessment is to be completed as part of the 2008/09 audit with the balance being completed as part of the 2009/10 plan.
- 13 The Commission proposes that the assessment will be based upon the evidence from three themes:
 - Managing money;
 - Governing the business; and
 - Managing other resources.
- 14 The Commission proposes that Data Quality will become an element of the Use of Resources framework from 2008/09.

Data quality 2007/08

- 15 This plan covers the 2007/08 data quality work. This is based on a three-stage approach covering:
 - Stage 1 management arrangements;
 - Stage 2 analytical review; and
 - Stage 3 risk-based data quality spot checks of a sample of 2007/08 performance indicators.
- 16 Work will be focused on the 2007/08 overall arrangements for data quality, particularly on the responsibility of the Council to manage the quality of its data including data from partners where relevant.
- 17 The fee estimate reflects an assessment of risk in relation to the Council's data quality arrangements and performance indicators. This risk assessment may change depending on our assessment of your overall management arrangements at stage 1 and we will update our plan accordingly, including any impact on the fee.

Whole of government accounts

18 We will be required to review and report on your WGA consolidation pack in accordance with the approach agreed with HM Treasury and the National Audit Office.

National Fraud Initiative

19 From 2008/09 work relating to the National Fraud Initiative will be carried out directly by the Commission under its new data matching powers under the Serious Crime Act 2007. The Commission will be consulting audited bodies on the work programme and fee scales for the National Fraud Initiative later this √year.

Certification of grant claims and returns

- 20 We will continue to certify the Council's claims and returns on the following basis:
 - claims below £100,000 will not be subject to certification:
 - claims between £100,000 and £500,000 will be subject to a reduced, light-touch certification: and
 - claims over £500,000 will be subject to a certification approach relevant to the auditor's assessment of the control environment and management preparation of claims. A robust control environment would lead to a reduced certification approach for these claims.

Appendix 2 – Basis for fee

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

Assumptions

- 3 In setting the fee, we have assumed that:
 - the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2007/08;
 - you will inform us of significant developments impacting on our audit;
 - internal audit meets the appropriate professional standards;
 - good quality working papers and records will be provided to support the financial statements by 30 June 2009;
 - requested information will be provided within agreed timescales; and
 - prompt responses will be provided to draft reports; and
 - additional work will not be required to address questions or objections raised by local government electors.
- 4 Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee. The fee for the audit of the financial statements will be re-visited when we issue the opinion audit plan.
- 5 Changes to the plan will be agreed with you. These may be required if:
 - new residual audit risks emerge;
 - additional work is required by the Audit Commission or other regulators; or
 - additional work is required as a result of changes in legislation, professional standards or as a result of changes in financial reporting.

- 6 Below is a detailed breakdown of the audit and inspection fee for 2008/09.
- The fee (plus VAT) will be charged in 12 equal instalments from April 2008 to March 2009.

Detailed audit and inspection fee Table 6

Audit area	Planned fee 2008/09	Planned/Actual fee 2007/08	Page
Audit			
Financial statements (including Whole of Government Accounts)	57,827	*	9
Use of Resources 2007/08 (including Data Quality)	25,033**	*	10
Equality & Diversity	6,999	N/A	
Total audit fee	89,859	80,000	
Inspection			
Inspection	5,972	5,899	13
Total inspection fee	5,972	5,899	
Total audit and inspection fee	93,579	85,899	
Certification of claims and returns	28,000	32,000	

^{*}not comparable

^{**} relates to 2007/08 Use of Resources and Data Quality work carried out by PwC

Appendix 3 – Initial risk assessment – Use of resources and VFM conclusion

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor's responsibilities
Managing finances – continued pressure to deliver more with limited resources.	Budget setting and monitoring and existing performance management arrangements.	Yes	We will review arrangements in place as part of our use of resources work and monitor performance through review of minutes and meetings with officers throughout the year.	UoR KLOE 1.1, 1.2 and 1.3.
The planned implementation of international financial reporting standards to local government accounts from 2010/11, will require careful forward planning to ensure that the relevant information is readily available at the time to	We are not aware of any issues in respect of the Council's record of responding to and implementing new financial reporting requirements.	Yes	We will liaise with key finance staff on the key changes required and the plans in place to address them. We will share any 'good' practice or other sources of advice as they become available.	Use of resources – Managing finances

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor's responsibilities
enable an efficient transition to the new financial reporting requirements				

Appendix 4 – Independence and objectivity

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

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



Appendix 5 – Working together

Meetings

- 1 The audit and inspection team will maintain knowledge of your issues to inform audit and inspection through regular liaison with key officers.
- 2 Our proposal for meetings is as follows.

Table 7	Proposed meetings with officers
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Council officers	Audit Commission staff	Timing	Purpose
Chief Executive Director of Resources	District Auditor (DA) Audit Manager (AM)	Quarterly: April, August, November, February	General update plus: • April - Audit and Inspection Plan • June - accounts progress and VFM
Head of Corporate Policy and Performance	AM	As required	Update
Head of Finance	AM and Team Leader (TL)	Quarterly	Update on audit and opinion issues
Chief Internal Auditor	AM and TL	Quarterly	Update on audit progress and issues
Audit Committee	DA and AM, with TL as appropriate	Quarterly	 Formal reporting of: Audit and Inspection Plan; Annual governance report; Annual Audit and Inspection Letter; and other issues as appropriate.

Sustainability

- 3 The Audit Commission is committed to promoting sustainability in our working practices and we will actively consider opportunities to reduce our impact on the environment. This will include:
 - reducing paper flow by encouraging you to submit documentation and working papers electronically;

use of video and telephone conferencing for meetings as appropriate; and

