

Police and Crime Commissioner for North Yorkshire

Audit Completion Report
Year ended 31 March 2013

September 2013



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01

Purpose of this report

This document communicates to you the outcome of our audit of your 2012/13 statement of accounts and matters that we are required to, or wish to bring to your attention

Purpose of this report and our audit approach

Purpose of this document

This document has been prepared to feed back the findings of our audit for the year ended 31 March 2013 and forms the basis for discussion with the Police and Crime Commissioner (the Commissioner) and the Audit Committee at its meeting on 23 September 2013.

Our communication with you is important to:

- share information to assist both the auditor and those charged with governance (the Commissioner) of to fulfil their respective responsibilities;
- provide constructive observations arising from the audit process to those charged with governance (the Commissioner);
- ensure as part of the two-way communication process we, as external auditors, gain an understanding of the attitude and views of those charged with governance (the Commissioner) to the internal and external operational, financial, compliance and other risks which might affect the statement of accounts, including the likelihood of those risks materialising and how they are managed; and
- receive feedback from those charged with governance (the Commissioner) as to the performance of the engagement team.

Independence

As part of our on-going risk assessment we monitor our relationships with you to identify any new actual or perceived threats to our independence within the regulatory or professional requirements governing us as your auditors.

No further threats to our independence have been identified since we issued our Audit Strategy Memorandum.

Our audit approach

Our audit has been conducted in accordance with International Standards of Auditing (UK and Ireland) (ISA (UK&I)) issued by the Auditing Practices Board.

There have been no changes to our audit approach as communicated to you in the Audit Strategy Memorandum dated June 2013.

Limitations

Our audit procedures, which have been designed to enable us to express an opinion on the statement of accounts, have included the examination of the transactions and the controls thereon of. The International Standards on Auditing (UK and Ireland) do not require us to design audit procedures for the purpose of identifying supplementary matters to communicate with those charged with governance.

Our audit included consideration of internal controls relevant to the preparation of the statement of accounts in order to design audit procedures that are appropriate in the circumstances, but not for expressing an opinion on the effectiveness of internal control or to identify any significant deficiencies in their design or operation.

We have included in this report only those matters that have come to our attention as a result of our normal audit procedures and, consequently, our comments should not be regarded as a comprehensive record of all deficiencies that may exist or improvements that could be made.

02

Overall conclusions and opinion

We give an opinion on your statement of accounts and conclude on whether you have made proper arrangements to secure economy, efficiency and effectiveness in your use of resources

Overall conclusions and opinion

Overall conclusion and opinion

At the time of issuing this report we anticipate:

- issuing an unqualified opinion on your statement of accounts; and
- concluding that you have made proper arrangements to secure economy, efficiency and effectiveness in your use of resources.

Audit status

We have substantially completed our audit of the statement of accounts for the year ended 31 March 2013.

At the time of preparing this report, there are three significant matters outstanding, and some other matters.

The significant matters outstanding relate to:

- receipt of the information we require from the local government pension fund administering authority's auditor (Deloitte LLP);
- receiving information from management to support allowances paid to senior officers in 2011/12 and 2012/13; and
- evidence from management to provide assurance over the related party transactions disclosure, as not all returns have been made by Members of the former Police Authority and senior managers, and as such there is currently insufficient evidence to support the completeness of the disclosure.

The following matters remain outstanding, and are usually done just prior to signing the audit opinion:

- review of the amended financial statements;
- review of post balance sheet events; and
- review on receipt of management representation letter.

Alongside our audit of your statement of accounts we are required to review your Whole of Government Accounts submission and report to the National Audit Office in line with their group instructions and guidance produced by the Audit Commission. Subject to completing this work we expect to be able to certify the closure of the 2012/13 audit by 30 September 2013.

We have not received any objections to the Commissioner's 2012/13 statement of accounts from electors and have no outstanding matters or correspondence with electors.

We will provide an update to you in relation to the matters outstanding above.

03

Significant risks and key judgement areas

We report to you the risks of material misstatement we identified in your statement of accounts and the key areas of management judgement that impact on your statement of accounts.

Significant risks and key judgement areas

Set out below are the significant risks and key areas of management judgement in the Audit Strategy Memorandum to which we paid particular attention in order to reduce the risk of material misstatement in the statement of accounts. We have detailed below the work performed to address each risk and judgement and our conclusions.

Significant audit risk	How did we address this risk	Conclusions
<p>Management override of controls Auditing standards state that management is in a unique position to perpetrate fraud, because of the ability to directly or indirectly manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. While the level of risk of management override of controls varies by entity, the risk is nevertheless present in <i>all</i> entities and therefore represents a significant risk of material misstatement because of fraud. This does not imply that we suspect actual or intended manipulation but that we approach the audit with due professional scepticism.</p>	<p>We updated our understanding and evaluation of internal controls procedures as part of our audit planning, including completion of a fraud risk assessment. We sought written assurances from the Commissioner and management on their controls and processes for assessing the risk of fraud in the financial statements and arrangements in place to identify, respond to and report fraud.</p> <p>We have also:</p> <ul style="list-style-type: none"> • Undertaken general ledger journal testing; • considered and reviewed material accounting estimates; • considered and reviewed any unusual or significant business transactions; and • considered any other local factors. 	<p>Our audit has provided the assurance we sought, and not highlighted any issues in this area to report.</p>
<p>Revenue and expenditure recognition Auditing Standards presume that there is a significant risk of fraud in the timing of revenue recognition leading to the material misstatement of revenue overall. This is because revenue is an area of particular focus by users of financial statements and can be subject to judgements as to when the full risk and reward of the ownership of an asset has passed. For many public sector bodies, the risk of material misstatement due to fraud relating to expenditure recognition may be a greater risk than material misstatement due to fraud relating to revenue recognition.</p>	<p>We evaluated the design and implementation of controls over year-end accruals and performed procedures to establish that expenditure and income are included in the correct year.</p>	<p>Our audit has provided the assurance we sought, and not highlighted any issues in this area to report.</p>

Significant risks and key judgement areas

Significant audit risk	How did we address this risk	Conclusions
<p>Accounting for the Impact of Police Reform</p> <p>The issue of whether items should be recognised in the Commissioner or Chief Constable accounts is a direct consequence of the requirement in the Police Reform and Social Responsibility Act 2011. This Act set up two separate corporation soles, one for the Commissioner and one for the Chief Constable and gave flexibility to local areas to implement local arrangements for managing responsibilities and delegations. As a result of this flexibility, accounting arrangements vary across the country in order to reflect local circumstances and there is no single solution to the accounting requirements for police bodies. Instead, management must use professional judgment to determine the accounting treatment that best reflects local arrangements.</p>	<p>On an ongoing basis we have discussed the approach to, and judgements made by, management in determining the accounting treatment that best reflects the arrangements that have been put in place for North Yorkshire.</p> <p>On receipt of the financial statements we:</p> <ul style="list-style-type: none"> • tested the basis of allocating income/funding, expenditure, assets and liabilities between the single entity financial statements of the Commissioner and Chief Constable; • ensured that disclosure requirements are met for the single entity and group accounts; and • tested the group accounts. 	<p>Due to the absence of clear definitive guidance it is unsurprising that our audit has highlighted several presentational and other disclosure issues. These are shown in section 4 of this report.</p>

Significant risks and key judgement areas

In addition to significant risks, we also identified in the Audit Strategy Memorandum the key areas of management judgement that would impact the statement of accounts. We detail below the work performed to evaluate the robustness of each judgement and our conclusions.

Areas of management judgement	How did we address this judgement	Conclusions
<p>Pensions entries (IAS 19) The financial statements are likely to contain material pensions entries in respect of retirement benefits. The calculation of these pensions figures, both assets and liabilities, can be subject to significant volatility and includes estimates based upon a complex interaction of actuarial assumptions. This results in an increased risk of material misstatement.</p>	<p>We discussed with key contacts any significant changes to the pensions estimates prior to the preparation of the final accounts. In addition to our standard programme of work in this area, we:</p> <ul style="list-style-type: none"> evaluated the management controls you have in place to assess the reasonableness of the figures provided by the actuaries; and considered the reasonableness of the actuaries outputs, referring to an expert's report on all actuaries nationally which is commissioned annually by the Audit Commission. 	<p>Our audit has provided the assurance we sought, and not highlighted any issues in this area to report.</p>
<p>Property, Plant and Equipment Valuations The Commissioner values all its assets over a five year period but is required to ensure that there are no material differences in valuations each financial year.</p> <p>There is a risk that that some material classes of assets may not have been included for valuation in year resulting in a material misstatement.</p> <p>There is also a risk of material misstatement due to high estimation uncertainty. This is because any percentage change in valuations may result in a material difference due to the size of the asset base.</p>	<p>We discussed with key contacts involved in valuations, and we:</p> <ul style="list-style-type: none"> evaluated the management controls you have in place to manage the asset valuations process; and assessed the reasonableness of your asset valuations in the financial statements using the work of our expert, Gerald Eve. 	<p>Our audit has provided the assurance we sought, and not highlighted any issues in this area to report.</p>

04

Audit findings

We report to you the significant findings from our audit of your statement of accounts

Audit findings

It is a requirement of ISA (UK&I) 260 that significant findings from the audit are communicated to those charged with governance.

Significant qualitative aspects of accounting practices

ISA (UK&I) 260 requires us to communicate with those charged with governance our views about significant qualitative aspects of the entity's accounting practices, including accounting policies, accounting estimates and financial statement disclosures.

Accounting policies

- The appropriateness of the accounting policies to the particular circumstances of the entity. Where acceptable alternative accounting policies exist, this communication may include identification of the financial statement items that are affected by the choice of significant accounting policies.
- Any changes in significant accounting policies, including the application of new accounting pronouncements.

Accounting estimates

- For items which estimates are significant, issues communicated could include: management's identification of accounting estimates, management's process for making accounting estimates, risks of material misstatement, indicators of possible management bias and disclosure of estimation uncertainty in the financial statements.

Financial statement disclosures

- The issues involved, and related judgements made, in formulating particularly sensitive financial statement disclosures (for example, disclosures related to revenue recognition, remuneration, going concern, subsequent events, and contingency issues).
- The overall neutrality, consistency and clarity of the disclosures in the financial statements.

We have no matters to report in these areas other than the issues reported in the disclosure amendments section that follows.

Significant difficulties encountered during the audit

ISA (UK&I) 260 also requires us to communicate with those charged with governance significant difficulties encountered during the audit. These include such matters as:

- Significant delays in management providing required information;
- An unnecessarily brief time within which to complete the audit;
- Extensive unexpected effort required to obtain sufficient appropriate audit evidence;
- The unavailability of expected information;
- Restrictions imposed on the auditor by management; and
- Management's unwillingness to make or extend its assessment of the entity's ability to continue as a going concern when requested.

We have no such matters to report.

Significant matters discussed with management

The only issue discussed with management, other than our usual discussions as part of gathering our audit evidence, has been the presentation and disclosure requirements in respect of the new arrangements since the introduction and transition from the former North Yorkshire Police Authority to the Police and Crime Commissioner and Chief Constable.

Other matters significant to the oversight of the financial reporting process

ISA (UK&I) 260 requires us to communicate other significant matters arising from the audit that are directly relevant to those charged with governance in overseeing the financial reporting process. These may include such matters as material misstatements of fact or material inconsistencies in information accompanying the audited financial statements that have been corrected.

We have no such matters to report.

Internal control

The purpose of our audit was to express an opinion on the financial statements. As part of our audit we have considered the internal controls in place relevant to the preparation of the financial statements, in order to design audit procedures to allow us to express an opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of internal control.

The matters reported are limited to those deficiencies and other control recommendations that we have identified during our audit and that we consider to be of sufficient importance to merit being reported. If we had performed more extensive procedures on internal control we might have identified more deficiencies to be reported or concluded that some of the reported deficiencies need not in fact have been reported.

We have no such matters to report.

Unadjusted misstatements

We are required to bring to your attention the misstatements found during the course of audit that have not been corrected, unless they are clearly trivial. We have no such issues to report.

Adjusted misstatements

Management have agreed to make the following adjustments to the draft financial statements:

- Intragroup funding in the Comprehensive Income and Expenditure Statement has been amended to be above 'Net cost of services' rather than below the line.

Disclosure amendments

Our audit identified the following disclosure amendments:

- Note 26 (reconciliation of fair value of the scheme assets) has been amended as the total for the police pension scheme 1987 of £22,104k and the police pension scheme 2006 of £2,065k should be shown as actuarial gains and losses so that the balance at the end of the year should be nil.
- Note 26 (basis for estimating assets and liabilities) has been amended in respect of the police pension scheme rate of increase in pensions from 1.33% to 2.5%, as shown in the actuaries reports.
- The Remuneration Report has been moved to become a note to the financial statements to improve compliance with the CIPFA Code. In addition, the senior officers salaries and post-employment benefits required amendment from £642k and £128K respectively, to £565k and £113k;
- Amendments were required to the format and disclosures in the Annual Governance Statement in respect of whether the Commissioner's financial management arrangements conform with the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2010), to ensure compliance with the CIPFA Code.
- Prior year comparatives have been added to separately disclose PCC and Group, to ensure compliance with accounting standards where merger accounting is applied.
- Accounting policy 15 required further information to improve disclosure on critical judgements for the recognition of assets and liabilities between the Commissioner's and the Chief Constable's Financial Statements.
- Note 12e (audit fees) required amendment to disclose the rebate issued by the Audit Commission separately, as opposed to in the 'Other services' line.
- A small number of other minor disclosure amendments were required.

05

Value for money conclusion

We are required to conclude on your arrangements for securing economy, efficiency and effectiveness in your use of resources

Value for money conclusion

We are required to conclude whether the Commissioner put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

The Audit Commission has specified that our value for money work consists of:

- a review of your annual governance statement;
- reviewing the work of other relevant regulatory bodies or inspectorates, to the extent the results of the work have an impact on my responsibilities; and
- any risk-based work we determine appropriate.

Our Audit Strategy Memorandum, issued in June 2013, confirmed that our work was to include review of reports issued by HMIC, and local risk based work to consider the transition from North Yorkshire Police Authority, and the governance arrangements put in place following that transition.

Our work has not highlighted any matters which we need to report.

We intend to issue an unqualified conclusion stating the Commissioner has proper arrangements to secure economy, efficiency and effectiveness in the use of its resources. Our draft conclusion is included in Appendix 2.

Appendices

1 Management representations

2 Draft auditor's report

3 Required communication

Management representations

To be provided by the Police and Crime Commissioner to us on headed note paper

[Date]

Dear Sir/Madam

Police and Crime Commissioner for North Yorkshire - audit for year ended 31 March 2013

This representation letter is provided in connection with your audit of the statement of accounts for the Police and Crime Commissioner for North Yorkshire (the Commissioner) for the year ended 31 March 2013 for the purpose of expressing an opinion as to whether the statement of accounts give a true and fair view in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom.

I confirm that the following representations are made on the basis of enquiries of management and staff with relevant knowledge and experience (and, where appropriate, inspection of supporting documentation) sufficient to satisfy ourselves that I can properly make each of the following representations to you.

My responsibility for the statement of accounts and accounting information

I believe that I have fulfilled my responsibilities for the true and fair presentation and preparation of the statement of accounts in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom.

My responsibility to provide and disclose relevant information

I have provided you with:

- access to all information of which we are aware that is relevant to the preparation of the statement of accounts such as records, documentation and other material;
- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to individuals within the organisation you determined it was necessary to contact in order to obtain audit evidence.

I confirm as Chief Finance Officer that I have taken all the necessary steps to make me aware of any relevant audit information and to establish that you, as auditors, are aware of this information. As far as I am aware there is no relevant audit information of which you, as auditors, are unaware.

Accounting records

I confirm that all transactions that have a material affect on the financial statements have been recorded in the accounting records and are reflected in the financial statements. All other records and related information, including minutes of all relevant meetings, have been made available to you.

Management representations (continued)

Accounting policies

I confirm that I have reviewed the accounting policies applied during the year in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom and International Accounting Standard 8 and consider these policies to faithfully represent the effects of transactions, other events or conditions on the Commissioner's financial position, financial performance and cash flows.

Accounting estimates, including those measured at fair value

I confirm that any significant assumptions used by the Commissioner in making accounting estimates, including those measured at fair value, are reasonable.

Contingencies

There are no material contingent losses including pending or potential litigation that should be accrued where:

- information presently available indicates that it is probable that an asset has been impaired or a liability had been incurred at the balance sheet date; and
- the amount of the loss can be reasonably estimated.

There are no material contingent losses that should be disclosed where, although either or both the conditions specified above are not met, there is a reasonable possibility that a loss, or a loss greater than that accrued, may have been incurred at the balance sheet date.

There are no contingent gains which should be disclosed.

All material matters, including unasserted claims, that may result in litigation against the Commissioner have been brought to your attention. All known actual or possible litigation and claims whose effects should be considered when preparing the financial statements have been disclosed to you and accounted for and disclosed in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom.

Laws and regulations

I confirm that I have disclosed to you all those events of which I am aware which involve known or suspected non-compliance with laws and regulations, together with the actual or contingent consequences which may arise therefrom.

We have complied with all aspects of contractual agreements that would have a material effect on the accounts in the event of non-compliance.

Fraud and error

I acknowledge my responsibility as Chief Finance Officer for the design, implementation and maintenance of internal control to prevent and detect fraud and error. I have disclosed to you:

- all the results of my assessment of the risk that the statement of accounts may be materially misstated as a result of fraud;
- all knowledge of fraud or suspected fraud affecting the Commissioner involving:
 - management and those charged with governance;
 - employees who have significant roles in internal control; and
 - others where fraud could have a material effect on the financial statements.

Management representations (continued)

I have disclosed to you all information in relation to any allegations of fraud, or suspected fraud, affecting the Commissioner's statement of accounts communicated by employees, former employees, analysts, regulators or others.

Related party transactions

I confirm that all related party relationships, transactions and balances, have been appropriately accounted for and disclosed in accordance with the requirements of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom. I have disclosed to you the identity of the Commissioner's related parties and all related party relationships and transactions of which I am aware.

Impairment review

To the best of my knowledge, there is nothing to indicate that there is a permanent reduction in the recoverable amount of the property, plant and equipment below their carrying value at the balance sheet date. An impairment review is therefore not considered necessary.

Future commitments

I am not aware of any plans, intentions or commitments that may materially affect the carrying value or classification of assets and liabilities or give rise to additional liabilities.

Subsequent events

I confirm all events subsequent to the date of the financial statements and for which the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom require adjustment or disclosure have been adjusted or disclosed. Should further material events occur after the date of this letter which may necessitate revision of the figures included in the financial statements or inclusion of a note thereto, I will advise you accordingly.

Unadjusted misstatements

I confirm that the effects of the uncorrected misstatements are immaterial, both individually and in aggregate, to the statement of accounts as a whole. A list of the uncorrected misstatements is attached to this letter as an Appendix.

Yours faithfully

Chief Finance Officer

Draft auditor's report

INDEPENDENT AUDITORS' REPORT TO THE POLICE AND CRIME COMMISSIONER FOR NORTH YORKSHIRE

Opinion on the financial statements

We have audited the financial statements of the Police and Crime Commissioner for North Yorkshire for the year ended 31 March 2013 under the Audit Commission Act 1998. The financial statements comprise the PCC and Group Movement in Reserves Statement, the PCC and Group Comprehensive Income and Expenditure Statement, the PCC and Group Balance Sheet, the PCC and Group Cash Flow Statement, and the related notes. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13.

This report is made solely to the Police and Crime Commissioner for North Yorkshire in accordance with Part II of the Audit Commission Act 1998 and for no other purpose, as set out in paragraph 48 of the Statement of Responsibilities of Auditors and Audited Bodies published by the Audit Commission in March 2010.

Respective responsibilities of the Chief Finance Officer and auditor

As explained more fully in the Statement of the Chief Finance Officer's Responsibilities, the Chief Finance Officer 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, 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 Police and Crime Commissioner's and Group's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Chief Finance Officer; and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the explanatory foreword to identify material inconsistencies with the audited financial statements. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

Draft auditor's report (continued)

Opinion on financial statements

In our opinion the financial statements:

- give a true and fair view of the financial position of the Police and Crime Commissioner for North Yorkshire as at 31 March 2013 and of its expenditure and income for the year then ended;
- give a true and fair view of the financial position of the Group as at 31 March 2013 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 2012/13.

Opinion on other matters

In our opinion, the information given in the explanatory foreword for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement does not reflect compliance with 'Delivering Good Governance in Local Government: a Framework' published by CIPFA/SOLACE in June 2007;
- We issue a report in the public interest under section 8 of the Audit Commission Act 1998;
- We designate under section 11 of the Audit Commission Act 1998 any recommendation as one that requires the Police and Crime Commissioner to consider it at a public meeting and to decide what action to take in response; or
- We exercise any other special powers of the auditor under the Audit Commission Act 1998.

We have nothing to report in these respects

Other matters on which we are required to conclude

We are required under Section 5 of the Audit Commission Act 1998 to satisfy ourselves that the Police and Crime Commissioner has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We have undertaken our audit in accordance with the Code of Audit Practice and, having regard to the guidance issued by the Audit Commission in November 2012, we have considered the results of the following:

- our review of the annual governance statement;
- the work of other relevant regulatory bodies or inspectorates, to the extent the results of the work have an impact on our responsibilities;
- our locally determined risk-based work.

As a result, we have concluded that there are no matters to report.

Draft auditor's report (continued)

Certificate

We certify that we have completed the audit in accordance with the requirements of the Audit Commission Act 1998 and the Code of Audit Practice issued by the Audit Commission.

[Signature]

Cameron Waddell CPFA
For and on behalf of Mazars LLP, Appointed Auditors
The Rivergreen Centre
Aykley Heads
Durham, DH1 5TS
[Date]

Required communication

ISA 260 'Communication With Those Charged With Governance' and ISA 265 'Communicating Deficiencies In Internal Control To Those Charged With Governance And Management' require the auditor to communicate a number of matters with those charged with governance. These matters are set out below along with our proposed approach.

Required	Audit conclusion
<p>Respective responsibilities of auditor and those charged with governance.</p> <p>Our responsibility for performing the audit in accordance with ISAs (UK and Ireland), which is directed towards forming and expressing an opinion on the statement of accounts.</p> <p>The audit of the statement of accounts does not relieve management or those charged with governance of their responsibilities.</p>	<p>This information was included in the Audit Strategy Memorandum.</p>
<p>Communication of the planned scope and timing of the audit.</p> <p>Matters communicated include:</p> <ul style="list-style-type: none"> • Significant audit risks and how we will address them; • Our approach to internal control relevant to the audit; • The application of the concept of materiality in the context of an audit; • Our use of the work of internal audit; • Your approach to internal control and how you oversee the effectiveness of internal control procedures; • The attitude, awareness and action of those charged with governance concerning the detection or possibility of fraud; and • Your response to new accounting standards, corporate governance practices and related matters. 	<p>This information was included in the Audit Strategy Memorandum.</p>
<p>Our views on significant qualitative aspect of accounting practices including accounting policies, accounting estimates and financial statement disclosures.</p> <p>When applicable, why we consider a significant accounting practice not to be appropriate to the entity.</p>	<p>Section 4 of this report.</p>

Required	Audit conclusion
<p>Significant difficulties, if any, encountered during the audit.</p> <p>Significant difficulties encountered during the audit may include such matters as:</p> <ul style="list-style-type: none"> • Significant delays in management providing required information; • An unnecessarily brief time within which to complete the audit; • Extensive unexpected effort required to obtain sufficient appropriate audit evidence; • The unavailability of expected information; • Restrictions imposed on the auditor by management; and • Management’s unwillingness to make or extend its assessment of the entity’s ability to continue as a going concern. 	<p>Section 4 of this report.</p>
<p>Details of significant matters discussed with, or subject to correspondence with management.</p>	<p>Section 4 of this report.</p>
<p>Details of written representations we require for our audit.</p>	<p>Appendix 1 to this report.</p>
<p>Any other matters which we consider to be significant to the oversight of the financial reporting process.</p>	<p>Section 4 of this report.</p>
<p>Statement that the engagement team and the firm have complied with relevant ethical requirements regarding independence.</p> <p>Written disclosure of relationships which have a bearing on our independence and safeguards we have put in place, details of non audit services provided and written confirmation of our independence.</p>	<p>This information was included in the Audit Strategy Memorandum.</p>
<p>Form, timing and general content of communications.</p>	<p>We issue our Audit Completion Report. If you require us to communicate in a different way please let us know.</p>
<p>Any significant deficiencies and other control recommendations in respect of internal control that we have identified during the audit.</p>	<p>Section 4 of this report.</p>

Required	Audit conclusion
<p>Our evaluation of the adequacy of the communication process between ourselves and those charged with governance.</p> <p>This may include:</p> <ul style="list-style-type: none"> • observations on appropriateness and timing of action taken by you in response to matters we have raised; • the openness of your communication with us; • your willingness and capacity to meet with us without management being present; • your opportunity to fully comprehend matters we have raised; • the extent to which you probe issues raised and our recommendations; • any communication we have had in establishing with you the form; • timing and general content of communications; • your awareness of how our discussions impact on your governance and management responsibilities; and • whether your communication with us meets legal and regulatory requirements. 	<p>We believe that the communication process between ourselves and those charged with governance has been adequate for the purposes of our audit.</p>

Should you require any further information, please do not hesitate to contact:

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