

Audit and Inspection Plan

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# Audit and Inspection Plan

**Carlisle City Council**

**Audit 2007/08**

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Author Richard McGahon

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For further information on the work of the Commission please contact:

Audit Commission, 1st Floor, Millbank Tower, Millbank, London SW1P 4HQ

Tel: 020 7828 1212 Fax: 020 7976 6187 Textphone (minicom): 020 7630 0421

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## Introduction

- 1 This plan has been developed by the Relationship Manager and appointed auditor. It sets out the audit and inspection work that we propose to undertake for the 2007/08 financial year. The plan is based on the Audit Commission's risk-based approach to audit planning and the requirements of Comprehensive Performance Assessment (CPA). It reflects:
  - audit and inspection work specified by the Audit Commission for 2007/08;
  - current national risks relevant to your local circumstances; and
  - your local risks and improvement priorities.
- 2 Your Relationship Manager will continue to help ensure further integration and co-ordination with the work of other inspectorates.
- 3 As we have not yet completed our audit for 2006/07 the audit planning process for 2007/08, 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 We comply with the statutory requirements governing our audit and inspection work, in particular:
  - the Audit Commission Act 1998;
  - the Local Government Act 1999 (best value inspection and audit); and
  - the Code of Audit Practice.
- 5 The Code of Audit Practice (the Code) defines auditors' responsibilities in relation to:
  - the financial statements including the statement on internal control (SIC); and
  - the audited body's arrangements for securing economy, efficiency and effectiveness in its use of resources.
- 6 The Audit Commission's Statement of Responsibilities of auditors and of audited bodies 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.
- 7 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.

## CPA and Inspection

- 8 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.
- 9 The Council's CPA category is therefore a key driver in the Commission's inspection planning process. For CPA 2003, the Council was categorised as good.
- 10 We have applied the principles set out in the CPA framework, *CPA – district council framework from 2006*, recognising the key strengths and areas for improvement in the Council's performance.
- 11 Strengths in the Council's performance include effective:
  - strong performance on housing benefits;
  - improvements in recycling and compositing rates;
  - targeted intervention to reduce crime and anti-social behaviour starting to have an impact;
  - strategic planning for Carlisle Renaissance.
- 12 Areas for improvement in the Council's performance include:
  - evaluating the actual accessibility of its services;
  - targeting improvement to raise the Council's overall comparative performance;
  - assessing current workforce capacity for delivery of the future demanding improvement agenda;
  - financial reporting.
- 13 On the basis of our planning process we have identified where our inspection activity will be focused for 2007/08 as follows.

**Table 1 Summary of inspection activity**

| Inspection activity                  | Reason/impact  |
|--------------------------------------|--|
| Relationship Manager (RM) 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.   |
| Access to services | This Cumbria wide inspection focuses on the Council's approach to improving services through customer access and focus. The objective of strengthening accessibility and user focus is to re-focus services around the needs of citizens and other customers, rather than the problems of those who provide services. |

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# Work under the Code of Audit Practice

## Financial statements

- 14 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).
- 15 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 2007, the financial position of the Council as at 31 March 2008 and its income and expenditure for the year.
- 16 We are also required to review whether the SIC has been presented in accordance with relevant requirements, and to report if it does not meet these requirements or if the SIC is misleading or inconsistent with our knowledge of the Council.

## Use of resources

### Value for money conclusion

- 17 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 auditors to have regard to a standard set of relevant criteria, issued by the Audit Commission, in arriving at their conclusion.
- 18 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.
- 19 We will also follow up our work from previous years to assess progress in implementing agreed recommendations.

### Use of resources assessment

- 20 The Audit Commission has specified that auditors will complete a use of resources assessment for 2007/08. The assessment focuses on the importance of having sound and strategic financial management to ensure that resources are available to support the Council's priorities and improve services.
- 21 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.

- 22 We 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  | <ul style="list-style-type: none"> <li>• preparation of financial statements</li> <li>• external reporting</li> </ul>                       |
| Financial management | <ul style="list-style-type: none"> <li>• medium-term financial strategy</li> <li>• budget monitoring</li> <li>• asset management</li> </ul> |
| Financial standing   | <ul style="list-style-type: none"> <li>• managing spending within available resources</li> </ul>  |
| Internal control     | <ul style="list-style-type: none"> <li>• risk management</li> <li>• system of internal control</li> <li>• probity and propriety</li> </ul>  |
| Value for money      | <ul style="list-style-type: none"> <li>• achieving value for money</li> <li>• managing and improving value for money</li> </ul>             |

- 23 We 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 its services.
- 24 The auditor's scores are reported to the Commission and are used as the basis for its overall use of resources judgement.

## Data quality

- 25 The Audit Commission has specified that auditors will be required to undertake audit work in relation to data quality. This is based on a three-stage approach covering:
- Stage 1 - management arrangements;
  - Stage 2 - completeness check; and
  - Stage 3 - risk-based data quality spot checks of a sample of performance indicators.
- 26 The work at stage 1 will link to our review of the Council's arrangements to secure data quality as required for our value for money conclusion and, together with the results of stage 2, will inform the risk assessment for the detailed spot check work to be undertaken at stage 3. The results of the work at stage 3 will inform the conclusions made on the management arrangements.

- 27 Our fee estimate reflects an assessment of risk in relation to the Council's 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.

## Best Value Performance Plan

- 28 We are required to carry out an audit of your Best Value Performance Plan (BVPP) and report on whether it has been prepared and published in accordance with legislation and statutory guidance.

## Assessing risks

- 29 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 our audit 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 co-ordinated with the work of other regulators, and that our work helps you to improve.
- 30 Our 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.
- 31 We have not included a risk assessment for our audit of the financial statements as many of the specific risks may not become apparent until after we have completed our 2006/07 audit. We may issue a separate opinion audit plan in November 2007, if necessary, in respect of our audit of the 2007/08 financial statements.
- 32 For each of the significant risks identified in relation to our use of resources work, we consider the arrangements put in place by the Council to mitigate the risk, and plan our work accordingly.
- 33 As part of our assessment we will use two on-line surveys to assess the level of embeddedness of certain aspects of the Council's internal control arrangements at both Member and officer level:
- Ethical Governance Diagnostic: This is focussed at member and director level and addresses areas including the Members code of conduct, the Standards Committee, conflicts of interest, leadership and relationships.

- Changing Organisational Cultures (Fraud and Corruption) Diagnostic: This is focussed at director and senior officer level and addresses areas including action taken by the Council, by individual departments, internal regulations and staff and member conduct.

## Health inequalities

- 34** Health inequalities is a significant problem in the Cumbria area. Our information shows, amongst other indicators, that there is significant variation within the county area and upon regional and national comparison for average life expectancy, infant mortality rates and rates for cancer, heart disease and strokes. Health inequalities is not just an NHS issue, but needs a partnership approach across all public sector bodies. Therefore a cross cutting piece of audit work, including the Cumbria PCT and Local Government bodies, will be completed.
- 35** Our initial risk assessment for use of resources work is provided in Appendix 1. This will be updated through our continuous planning process as the year progresses.

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## Work specified by the Audit Commission

### Whole of Government Accounts (WGA)

- 36 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 which is proportionate to risk.

### National Fraud Initiative

- 37 The Council participates in the National Fraud Initiative which is the Audit Commission's computerised data matching exercise designed to detect fraud perpetrated on public bodies. This work will be carried out by an individual appointed to assist in the audit of the Council's accounts (in accordance with section 3(9) of the Audit Commission Act 1998).

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## Voluntary improvement work

- 38 Under section 35 of the Audit Commission Act 1998, the Commission may undertake voluntary improvement work at the request of the audited body. We are not proposing to do any voluntary improvement work at Carlisle City Council during 2007/08. However, if the Council approaches us to undertake any specific work we will be happy to discuss our potential involvement.

## Certification of grant claims and returns

- 39 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.

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## The audit and inspection fee

- 40 The details of the structure of scale fees are set out in the Audit Commission's "Work programme and fee scales 2007/08". Scale fees are based on a number of variables, including the type, size and location of the audited body.
- 41 The total indicative fee for audit and inspection work included in this audit and inspection plan for 2007/08 is £129,185 which compares with the planned fee of £116,485 for 2006/07. The increase in the fee is largely due to:
- the requirement to audit the Whole of Government Accounts returns;
  - NFI now included within audit fee;
  - a cross sector review of health inequalities in Cumbria;
  - an "access to services" inspection this year;
  - additional governance work.
- 42 Further details are provided in Appendix 2 which includes a breakdown of the fee; specific audit risk factors; the assumptions made when determining the audit fee (for example, the timeliness and quality of draft accounts presented for audit and the supporting working papers), specific actions Carlisle City Council could take to reduce its audit and inspection fees; and the process for agreeing any changes to the fee. The fee includes all work identified in this plan unless specifically excluded.
- 43 In addition we estimate that we will charge approximately £32,000 for the certification of claims and returns.
- 44 As indicated in paragraphs 2, 3 and 35, the audit planning process will continue as the year progresses and it is likely that there will be some changes to our planned work and hence to the indicative fee quoted in paragraph 41 above. Any changes to the fee will be agreed with you.

## Other information

### The audit and inspection team

- 45 The key members of the audit and inspection team for the 2007/08 audit are shown in the table below.

**Table 2**

| Name  | Contact details                                       | Responsibilities   |
|---|---|--|
| Mark Heap<br>Relationship Manager<br>and District Auditor | m-heap@audit-<br>commission.gov.uk<br>01204 877300    | 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.<br>Responsible for the overall delivery of the audit including the quality of outputs, signing the audit opinion and vfm conclusion, and liaison with the Chief Executive and the Audit Committee. |
| Richard McGahon<br>Audit Manager                          | r-mcgahon@audit-<br>commission.gov.uk<br>01228 817240 | Manages and co-ordinates the different elements of the audit work. Key point of contact for the Director of Corporate Services.  |
| Keith Power<br>Area Performance<br>Lead                   | k-power@audit-<br>commission.gov.uk<br>01228 607265   | Responsible for the delivery of elements of the use of resources work including the value for money theme of the use of resources assessment.  |
| Barry Lennox<br>Team Leader                               | b-lennox@audit-<br>commission.gov.uk<br>01228 817240  | Will support the Audit Manager and the Area Performance Lead in the delivery of the audit.   |

### Independence and objectivity

- 46 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.

- 47 We comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised at Appendix 3.

## Quality of service

- 48 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 the Relationship Manager and District Auditor in the first instance. Alternatively you may wish to contact the Head of Operations, Frank Kerkham.
- 49 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

- 50 Our reports will be discussed and agreed with the appropriate officers before being issued to the Audit Committee.

**Table 3**

| Planned output   | Indicative date |
|--|-----------------|
| Access to services   | September 2007  |
| Opinion audit plan (If required)                                   | November 2007   |
| Changing organisational cultures and ethical governance surveys    | January 2008    |
| Health inequalities  | February 2008   |
| Interim audit memorandum   | June 2008       |
| Data quality feedback report                                       | September 2008  |
| Annual governance report   | September 2008  |
| Opinion on the financial statements and value for money conclusion | September 2008  |
| Final accounts memorandum  | November 2008   |
| Use of resources report  | December 2008   |
| BVPP report  | December 2008   |
| Annual audit and inspection letter                                 | TBC             |

## Appendix 1 – Initial risk assessment – use of resources

| Significant risks identified   | Mitigating action by audited body  | Residual audit risk | Action in response to residual audit risk   | Link to auditor’s responsibilities                    |
|--|--|---------------------|---|---|
| <p>Risk of incorrect value for money conclusion. In accordance with the Code of Audit Practice, auditors are required to give a positive conclusion as to whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.</p> | <p>Use of resources assurances in order to identify a plan of action for improving the Council's economy, efficiency and effectiveness.</p>  | <p>Yes</p>          | <p>We will complete the use of resources review to assess how well the Council manages and uses its resources.</p>  | <p>All Use of resources KLOEs and VFM conclusion.</p> |
| <p>Slow progress in ensuring that policies and services respond to varying levels of need or access to services for particular groups or localities.</p>   | <p>Progress is being made in developing detailed community information in ward and city profiles. There has also been the re-opening of the customer contact centre and significant improvement in the proportion of interactions with the Council that can be carried out electronically.</p> | <p>Yes</p>          | <p>The Audit Commission reported on the position of individual Councils in providing accessible services in 2005. A follow up inspection on access to services will review progress made to date.</p> | <p>Use of resources VFM and Direction of travel.</p>  |

| Significant risks identified  | Mitigating action by audited body  | Residual audit risk | Action in response to residual audit risk   | Link to auditor's responsibilities                     |
|---|--|---------------------|---|--|
| <p>Health inequalities is a significant problem in the Cumbria area. Our information shows, amongst other indicators, that there is significant variation within the county area and upon regional and national comparison, in areas such as :-</p> <ul style="list-style-type: none"> <li>• average life expectancy</li> <li>• infant mortality rates</li> <li>• death by suicide and death by accidents</li> <li>• cancer, heart disease, stroke rates</li> </ul> | <p>There are strategic partnerships in place between NHS and Local Authority bodies. These are the Cumbria Strategic Partnerships, the Local Area Agreement (LAAs) and the Local Strategic Partnership (LSP) with specific targets.</p> <p>Cumbria PCT and Cumbria County Council have recently jointly appointed a Director of Public Health.</p> <p>It is recognised that arrangements need to be enhanced across Cumbria at all levels if a whole-systems approach to service planning and delivery is to be developed that will tackle the health inequalities issues.</p> | <p>Yes</p>          | <p>Health inequalities is not just an NHS issue, but needs a partnership approach across all public sector bodies. Therefore a cross cutting piece of audit work, including the PCT and Local Government bodies, will be completed.</p> <p>The audit will include areas such as:</p> <ul style="list-style-type: none"> <li>• Corporate responsibility</li> <li>• Performance Management</li> <li>• Public health services</li> <li>• Commissioning including the identification of disadvantaged communities</li> <li>• Voluntary and community sector engagement</li> </ul> | <p>Use of resources - Value for money 5.1 and 5.2.</p> |

18 Audit and Inspection Plan | Appendix 1 – Initial risk assessment – use of resources

| Significant risks identified   | Mitigating action by audited body   | Residual audit risk | Action in response to residual audit risk  | Link to auditor’s responsibilities |
|--|---|---------------------|--|------------------------------------|
| <p>Use of resources indicates that the Council meets minimum requirements in its promotion of probity and propriety in the conduct of its business. The Council needs to be able to demonstrate that it is proactive in raising the standards of ethical conduct amongst members and staff and ensuring that counter fraud arrangements are widely understood.</p> | <p>Members and Officers are aware of the need to embed ethical governance arrangements.</p> | <p>Yes</p>          | <p>As part of our assessment we will use two on-line surveys to assess the level of embeddedness of certain aspects of the Council's internal control arrangements at both member and officer level.</p> <p>Ethical Governance Diagnostic: This is focused at member and director level and addresses areas including the member's code of conduct, the Standards Committee, conflicts of interest, leadership and relationships.</p> <p>Changing Organisational Cultures (Fraud and Corruption) Diagnostic: This is focused at director and senior officer level and addresses areas including action taken by the Council, by individual departments, internal regulations and staff and member conduct.</p> | <p>Use of resources 4.3</p>        |

## Appendix 2 – Audit and inspection fee

- 1 Table 4 provides details of the planned audit and inspection fee for 2007/08 with a comparison to the planned fee for 2006/07.

**Table 4**

| <b>Audit area</b>                   | <b>Planned fee 2007/08<br/>£</b> | <b>Planned fee 2006/07<br/>£</b> |
|-------------------------------------|----------------------------------|----------------------------------|
| <b>Audit</b>                        |                                  |                                  |
| Financial statements                | 90,460                           | 87,714                           |
| Use of resources (including BVPP)   | 18,147                           | 19,544                           |
| Data quality                        | 9,737                            | 5,087                            |
| Whole of government accounts        | 3,050                            | 0                                |
| National Fraud Initiative           | 625                              | 0                                |
| Total audit fee                     | 122,019                          | 112,345                          |
| <b>Inspection</b>                   |                                  |                                  |
| Relationship management             | 2,950                            | 2,070                            |
| Direction of Travel                 | 2,950                            | 2,070                            |
| Service inspection                  | 1,266                            | 0                                |
| Corporate inspection                | 0                                | 0                                |
| Total inspection fee                | 7,166                            | 4,140                            |
| Total audit and inspection fee      | 129,185                          | 116,485                          |
| Certification of claims and returns | 32,000                           | 31,000 (planned)                 |

- 2 The Audit Commission scale fee for this Council is £103,810. The fee proposed for 2007/08 is +18 per cent compared to the scale fee and is within the normal level of variation specified by the Commission.
- 3 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.

- 4 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.
- 5 The fee (plus VAT) will be charged in 12 equal instalments from May 2007 to April 2008.

## Specific audit risk factors

- 6 In setting the audit fee we have taken into account the following specific risk factors of not developing effective:
  - financial reporting arrangements so that the accounts submitted for audit are 'presented fairly' and contain only minimal errors;
  - governance arrangements to ensure effective use of resources;
  - policy and service planning approaches that are developed to fully consider equality and diversity issues that are relevant to the local community;
  - arrangements for assessing current workforce capacity for delivery of the future improvement agenda.

## Assumptions

- 7 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 2006/07;
  - you will inform us of significant developments impacting on our audit;
  - internal audit meets the appropriate professional standards;
  - internal audit undertakes appropriate work on all systems that provide material figures in the financial statements sufficient that we can place reliance for the purposes of our audit;
  - good quality working papers and records will be provided to support the financial statements by 30th June 2008;
  - requested information will be provided within agreed timescales;
  - 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.
- 8 Where these assumptions are not met, we 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.
- 9 Changes to the plan will be agreed with you. These may be required if:

- new residual audit risks emerge;
- additional work is required of us by the Audit Commission or other regulators; and
- additional work is required as a result of changes in legislation, professional standards or as a result of changes in financial reporting.

## **Specific actions Carlisle City Council could take to reduce its audit and inspection fees**

- 10 The Audit Commission requires its auditors to inform a council of specific actions it could take to reduce its audit and inspection fees. We have identified the following actions Carlisle City Council could take:
- ensure that the accounts submitted for audit are 'presented fairly' and contain only minimal errors;
  - information to support the accounts could be improved in some areas;
  - improve the overall use of resources score of the Council by acting on any improvement areas including financial reporting;
  - continue to improve the provision of any information requested within agreed timescales; and
  - implement audit recommendations promptly.

## **Process for agreeing any changes in audit fees**

- 11 If we need to make any significant amendments to the audit fee during the course of this plan, we will firstly discuss this with the Chief Executive and Director of Corporate Services. We will then prepare a report outlining the reasons why the fee needs to change for discussion with the Audit Committee.

## Appendix 3 – Independence and Objectivity

- 12 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 my 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).
- 13 The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.
- 14 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.
- 15 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 authority on matters which are considered to be of sufficient importance.
- 16 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.

17 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 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; and
- the District Auditor and members of the audit team must abide by the Commission's policy on gifts, hospitality and entertainment.

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