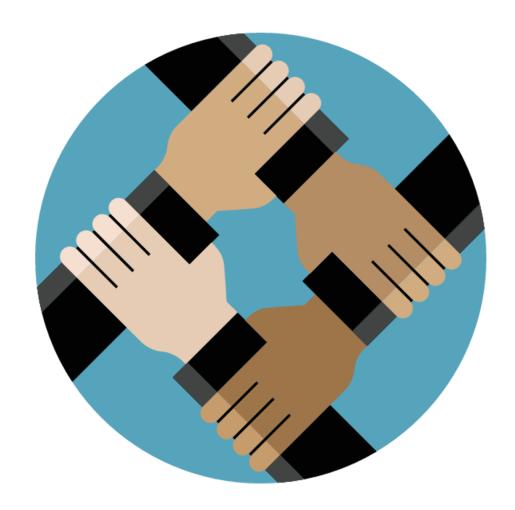
Deloitte.





Planning report to the Audit and Scrutiny Committee for the year ending 31 March 2019

Issued on 4 January 2018 for Audit and Scrutiny Committee meeting on 21 January 2018

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Partner introduction

The key messages in this report

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

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

I have pleasure in presenting our planning report to the Audit and Scrutiny Committee for our first year audit of the 2018/19 financial statements. I would like to draw your attention to the key messages of this paper:

Audit Plan

- We are in the process of completing our handover with KPMG, including review of their prior year file.
- We are developing our understanding of the Council through discussion with management and review of relevant documentation from across the Council.
- Based on our progress to date, we have developed this plan in collaboration with the Council to ensure that we provide an effective audit service that meets your expectations and focuses on the most significant areas of importance and risk to the Council.
- Based on our understanding of the Council we have developed our proposed materiality figure for the Council's audit.

Key risks

- We have taken an initial view as to the significant audit risks the Council faces. These are:
- Property Valuations
- Completeness and cut off of Demand Led Expenditure
- Pensions
- Management Override of Controls

Regulatory change

 Our audit is carried out under the Code of Audit Practice issued by the National Audit Office.

Responsibilities of the Audit and Scrutiny Committee

Helping you fulfil your responsibilities

Why do we interact with the Audit and Scrutiny Committee ?

To communicate audit scope

To provide timely and relevant observations

To provide additional information to help you fulfil your broader responsibilities

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

- At the start of each annual audit cycle, ensure that the scope of the external audit is appropriate.
- Make recommendations as to the auditor appointment and implement a policy on the engagement of the external auditor to supply non-audit services.
- Review the internal control and risk management systems
 Explain what actions have been, or are being taken to remedy any significant failings or weaknesses.

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

- Impact assessment of key judgements and level of management challenge.

- Review of external audit findings, key judgements, level of misstatements.
- Assess the quality of the internal team, their incentives and the need for supplementary skillsets.
- Assess the completeness of disclosures, including consistency with disclosures on business model and strategy and, where requested by the Board, provide advice in respect of the fair, balanced and understandable statement.
- Assess and advise the board on the appropriateness of the Annual Governance Statement, including conclusion on value for money.
- Consider annually whether the scope of the internal audit programme is adequate.
- Monitor and review the effectiveness of the internal audit activities.

Oversight of external audit

Integrity of reporting

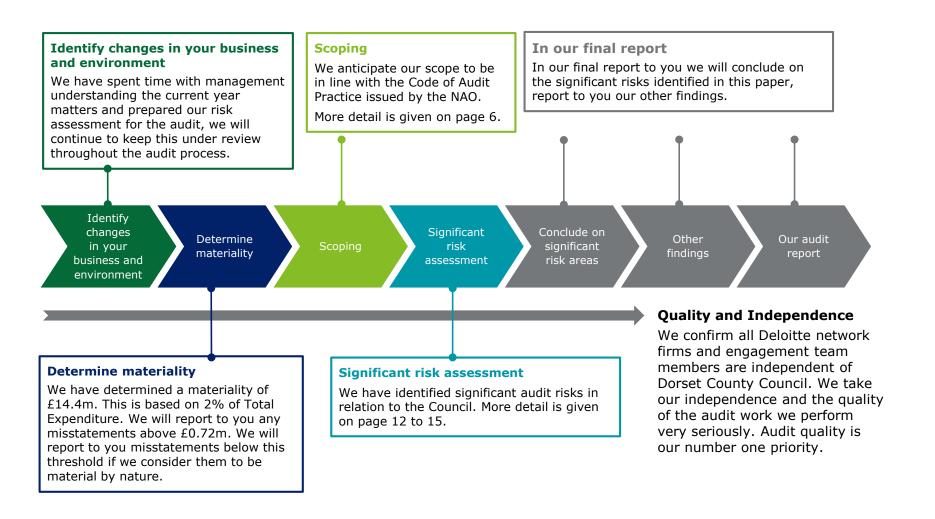
Internal controls and risks

Oversight of internal audit

Whistle-blowing and fraud

Our audit explained

We tailor our audit to your business and your strategy



Scope of work and approach

We have four key areas of responsibility under the Audit Code

Financial statements

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

We are also required to issue a separate assurance report to the NAO on the Council's separate return required for the purposes of its audit of the Whole of Government Accounts and departmental accounts.

Annual Governance Statement

We are required to consider the completeness of the disclosures in the Annual Governance Statement in meeting the relevant requirements and identify any inconsistencies between the disclosures and the information that we are aware of from our work on the financial statements and other work.

As part of our work we will review the annual report and compare with other available information to ensure there are no material inconsistencies. We will also review any reports from other relevant regulatory bodies and any related action plans developed by the Council.

Value for Money conclusion

We are required to satisfy ourselves that the Council has made proper arrangements for securing financial resilience and economy, efficiency and effectiveness in its use of resources.

To perform this work, we are required to:

- plan our work based on consideration of the significant risks of giving a wrong conclusion; and
- carry out as much work as is appropriate to enable us to give a safe conclusion on the arrangements to secure VFM.

Our work therefore includes a detailed risk assessment based on the risk factors identified in the course of our audits. This is followed by specific work focussed on the risks identified.

We then provide a conclusion on these arrangements as part of our final reporting to you.

Scope of work and approach

Our approach

Liaison with internal audit

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

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

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

Approach to controls testing

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

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

refresh our understanding of the Trust and its any controls that address those including the relevant controls

Carry out 'design

Design and perform a combination of substantive analytical procedures and tests selected controls most responsive to the assessed risks

Promoting high quality reporting to stakeholders

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

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

We would welcome early discussion on the planned format of the financial statements, and whether there is scope for simplifying or streamlining disclosures, as well as the opportunity to review a skeleton set of financial statements and an early draft of the annual report ahead of the typical reporting timetable to feedback any comments to management.

Value for Money and other reporting

The Code of Audit Practice requires us to report by exception in our audit report any matters that we identify that indicate the Council has not made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Continuous communication and reporting Planned timing of the audit

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

Planning Interim Year end fieldwork Reporting activities Document design and Year-end closing Planning meetings to Substantive testing of implementation of key meetings inform risk all areas. assessment; and agree controls and update Reporting of on key judgemental understanding of key Finalisation of work in significant control business cycles for any accounting issues. support of value for deficiencies changes. money responsibilities. Document our Signing audit reports Substantive testing of understanding of the Detailed review of in respect of limited areas including entity and key controls annual accounts and Financial Statements fixed asset additions. and business cycle report, including expenditure, payroll, Issuing Annual Audit Annual Governance processes relating to certain areas of Letter the financial reporting Statement. income. process reporting. Review of final internal Update on value for Review of key Council audit reports and money responsibilities. documents including opinion. Cabinet, Council and Audit and Scrutiny Completion of testing Committee minutes. on significant audit risks. Final report to the Verbal update to the Any additional **Audit and Scrutiny** 2019 Audit Plan Audit and Scrutiny reporting as required Committee Committee November 2018 -**February – March** May - June 2019 **July 2019** January 2019 2019 Ongoing communication and feedback

Materiality

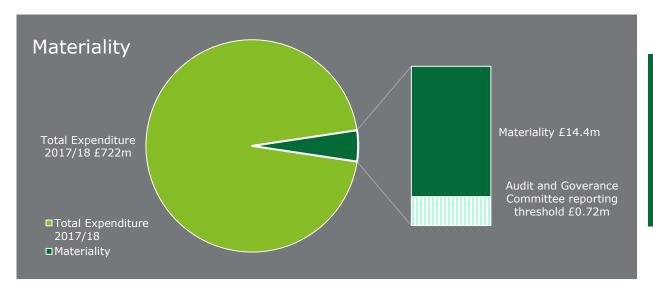
Our approach to materiality

Basis of our materiality benchmark

- The audit partner has determined materiality as £14.4m, based on professional judgement, the requirement of auditing standards and the financial measures most relevant to users of the financial statements.
- We have used 2% of Total Expenditure based on the 2017/18 audited accounts as the benchmark for determining materiality.
- We will re-visit the determined materiality based on completion of interim audit procedures.

Reporting to those charged with governance

- We will report to you all misstatements found in excess of £0.72m.
- We will report to you misstatements below this threshold if we consider them to be material by nature.



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

Our risk assessment process

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

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

Deloitte view

Management must carefully consider the principal risks, uncertainties and accounting estimates of the Council. Given the confirmation of the merger of the Council's in Dorset we have included this as an area of audit interest – please see page 16.

Principal risk and uncertainties

- · Property valuations
- Impairment
- Economic environment
- · Demand Led Services
- Funding Settlement.

Changes in your business and environment

Local Council merger & loss of staff.

IAS 1 Critical accounting estimates

- Impairment
- Provisions and contingencies
- Property valuations

Audit and Scrutiny Committee report

Pension valuations

The next page summarises the significant risks that we will focus on during our audit. All the risks mentioned in the prior year Audit and Scrutiny Committee report are included as significant risks in this year's audit plan. We have also included Completeness of Demand Led expenditure as a new significant risk as a result of our assesment of the Council.

Significant risk dashboard

Risk	Materi al	Fraud risk	Planned approach to controls	Level of management judgement	Management paper expected	Expected to be included in the Audit and Scrutiny Committee's report	Slide no.
Property Valuations	\bigcirc	\otimes	D+I		\bigcirc	\bigcirc	12
Completeness and cut off of Demand Led Expenditure.	\bigcirc	\bigcirc	D+I		\bigcirc	\bigcirc	13
Pensions	\bigcirc	\otimes	D+I		\otimes	\bigcirc	14
Management Override of Controls	\bigcirc	\bigcirc	D+I		\otimes	\bigcirc	15

At the planning state we have not identified any significant Value for Money risks. If this changes, we will report this fact to the committee in the next paper.

D+I: Assessing the design and implementation of key controls OE: Testing of the operating effectiveness of key controls

Risk 1 – Property Valuation

Risk identified

The council held £767m of property assets at 31 March 2017 which decreased to £764m as at 31 March 2018. The decrease was in part due to disposals and transfers of 17m and upwards revaluations of £14m as a result of the Council undertaking a valuation exercise during 2017/18.

The Code requires that where assets are subject to revaluation, their year end carrying value should reflect the appropriate fair value at that date. The Council has adopted a rolling revaluation model which sees all land and buildings revalued over a five year cycle. As a result of this, however, individual assets may not be revalued for four years.

Furthermore the Council completed the valuation as at the 1 September 2018, 7 months before the year end. Any changes to factors used in the valuation process could materially affect the value of the Council's assets as at year end.

In addition Brexit / Brexit uncertainty could have a material impact on valuations between January and March 2019 which would need to be reflected in the year end valuation position.

There is therefore a risk that that the value of property assets materially differ from the year end fair value.

Our response

We will test the design and implementation of key controls in place around the property valuation, and how the Council assures itself that there are no material impairments or changes in value for the assets not covered by the annual valuation;

We will review any revaluations performed in the year, assessing whether they have been performed in a reasonable manner, on a timely basis and by suitably qualified individuals;

We will use our valuation specialists, Deloitte Real Estate, to support our review and challenge the appropriateness of the year end indices used by the Council as well as the Impairment review memo prepared by the Council;

We will use our valuation specialists, Deloitte Real Estate, to support our review and challenge the appropriateness of the Council's assumptions on its assets values between September 2018 and Year end.

We will test a sample of revalued assets and re-perform the calculation assessing whether the movement has been recorded through the correct line of the accounts.

Risk 2 – Completeness and cut-off of demand led expenditure

Risk identified

Under UK auditing standards, there is a presumed risk of revenue recognition due to fraud. We have rebutted this risk, and instead believe that the fraud risk lies with the completeness and cut-off of demand led expenditure. We identify this demand led expenditure to be in the following budget areas for the Council: Care and Protection (Children's Directorate) and Adult Care Service User Related (Adult & Community Services Directorate).

As at October 2018, the forecast year end overspend in Care and Protection is £3.6m, and Adult Care Service User Related £1.9m. Demand led children and adult services are facing national scrutiny from press and politicians, and the spend per service user can be significant. There is an inherent fraud risk associated with the under recording of expenditure in order for the Council to report a more favourable year-end position.

There is a risk that the Council may materially misstate expenditure through the accruals and provisions balance, including year-end transactions, in an attempt to report a more favourable year end position.

Our response

Our work in this area will include the following:

We will obtain an understanding of the design and implementation of the key controls in place in relation to recording completeness and cut-off of demand led expenditure (Care and Protection and Adult Care Service User Related);

We will perform focused testing in relation to the completeness and cut-off of demand led expenditure (Care and Protection and Adult Care Service User Related) including detailed reviews of provisions and accruals for these services; and,

We will review and challenge the assumptions made in relation to year-end estimates and judgements to assess completeness and accuracy of recorded demand led expenditure.

Risk 3 – Pensions

Risk	iden	tified
171317		

The net pension liability is a material element of the Council's balance sheet. The council is an admitted body of the Dorset County Pension Fund. The valuation of the Scheme relies on a number of assumptions, including actuarial assumptions, and actuarial methodology which results in the Council's overall valuation. Furthermore there are financial and demographic assumptions used in the calculation of the Council's valuation – e.g. the discount rate, inflation rates, mortality rates. These assumptions should also reflect the profile of the Council's employees, and should be based on appropriate data.

There is a risk that the assumptions and methodology used in the valuation of the Council's pension obligation are not reasonable. This could have a material impact to the net pension liability accounted for in the financial statements

Our response

We will obtain an understanding of the design and implementation of the key controls in place in relation to review of the assumptions by the Council;

We will evaluate the competency, objectivity and independence of Barnett Waddingham, the actuarial specialist;

We will review the methodology and appropriateness of the assumptions used in the valuation, utilising a Deloitte Actuary to provide specialist assessment of the variables used;

We will review the pension related disclosures in the financial accounts; and,

We will gain assurances over the pension assets.

Risk 4 – Management override of controls

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

Areas of audit interest

The following areas have been identified. These are not currently significant risks, but may become significant risks if the risk profile changes during our audit and therefore are being brought to the Committees attention.

Dorset Council

As at the 31 March 2019, Dorset County Council will merge with East Dorset, North Dorset, Purbeck, Weymouth & Portland and West Dorset Councils to form Dorset Council.

As part of the merger, there will be a workforce consolidation process, which could lead to key staff involved in the delivery of the Council's financial information leaving, which which could impact on the ability to provide information to the audit team or staff prioritising merger related tasks rather than business as usual tasks or audit requests.

As part of the merger process the Finance Team has been asking our opinion on a number of issues, for example future accounting policies.

Deloitte Response:

There is risk around the delivery of the audit, due to staff leaving the organisation as a result of the merger, being preoccupied with delivering the merger and the required changes. We have scheduled a larger interim audit to complete as much work as possible before the merger takes effect, and will hold regular catch ups with the finance team to monitor progress at final.

Specialist Debt

The Council has the following specialist debt:

- £54.5m Lender Option Borrower Option loans (LOBOs); and,
- £25m Local Authority Loan Notes (LALNs).

There has been significant media attention on Local Authorities holding LOBOs / LALNs and the potential onerous nature of the contracts.

In addition the 18/19 CIPFA Code was revised for IFRS 9 and CIPFA / LASAAC issued clarification statement on accounting for LOBOs in May 2018.

Deloitte Response:

We will review the Council's accounting treatment of the debt and use the expertise of a Deloitte Financial Instrument Specialist to review the debt and its valuation reported in the accounts.

Private Finance Intiative (PFI)

The Council has two PFI contracts (Colfox School, and streetlight provision across the County) with total liabilities as at 31 March 2019 of £27.7m

The capital repayments, interest charges and service charges are calculated using the Council's PFI model. This is based on a variety of inputs.

Deloitte Response:

We will review the Council's PFI model, reviewing the inputs and calculations used to generate the capital repayment, interest and service figures. We will also review the accounting treatment, ensuring it is in line with the Code / IFRIC 12.

Purpose of our report and responsibility statement

Our report is designed to help you meet your governance duties

What we report

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

 Our audit plan, including key audit judgements and the planned scope.

Use of this report

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

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

What we don't report

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

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

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

Other relevant communications

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

Deloitte LLP

Cardiff | January 2019

Appendices

Fraud responsibilities and representations

Responsibilities explained



Your Responsibilities:

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



Our responsibilities:

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

Fraud Characteristics:



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

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

- We acknowledge our responsibilities for the design, implementation and maintenance of internal control to prevent and detect fraud and error.
- We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- [We are not aware of any fraud or suspected fraud / We have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the entity or group and involves:
 - (i) management;
 - (ii) employees who have significant roles in internal control; or
 - (iii) others where the fraud could have a material effect on the financial statements.1
- We have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the entity's financial statements communicated by employees, former employees, analysts, regulators or others.

Fraud responsibilities and representations

Inquiries

We will make the following inquiries regarding fraud:



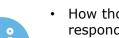
Management:

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

Internal audit



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



Those charged with governance

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

Independence and fees

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

Independence confirmation					
Fees	There are no non-audit fees.				
Non-audit services	In our opinion there are no inconsistencies between the FRC's Ethical Standard and the Council's approach for the supply of non-audit services or any apparent breach of that policy. We continue to review our independence and ensure that appropriate safeguards are in place including, but not limited to, the rotation of senior partners and professional staff and the involvement of additional partners and professional staff to carry out reviews of the work performed and to otherwise advise as necessary.				
Relationships	We have not other relationships with the Council, its directors, senior managers and affiliates, and have not supplied any services to other known connected parties.				

Independence and Fees

The professional fees expected to be charged by Deloitte in the period from 1 April 2018 to 31 March 2019 are as follows:

	Current year £'000
Financial statement audit including Whole of Government and procedures in respect of Value for Money assessment	57
Audit of subsidiaries/other committees	0
Total audit	57
Audit related assurance services	0
Other assurance services	0
Total assurance services	0
Total non-audit services	0
Total fees	57

Our approach to quality

AQR team report and findings

We maintain a relentless focus on quality and our quality control procedures and continue to invest in and enhance our overall firm Audit Quality Monitoring and Measuring programme.

In June 2018 the Financial Reporting Council ("FRC") issued individual reports on each of the eight largest firms, including Deloitte, on Audit Quality Inspections which provides a summary of the findings of its Audit Quality Review ("AQR") team for the 2017/18 cycle of reviews.

We take the findings of the AQR seriously and we listen carefully to the views of the AQR and other external audit inspectors. We remediate every finding regardless of its significance and seek to take immediate and effective actions, not just on the individual audits selected but across our entire audit portfolio. We are committed to continuously improving all aspects of audit quality in order to provide consistently high quality audits that underpin the stability of our capital markets.

We have improved the speed by which we communicate potential audit findings, arising from the AQR inspections and our own internal reviews to a wider population, however, we need to do more to ensure these actions are embedded. In order to achieve this we have launched a more detailed risk identification process and our InFlight review programme. This programme is aimed at having a greater impact on the quality of the audit before the audit report is signed. Consistent achievement of quality improvements is our aim as we move towards the AOR's 90% benchmark.

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

The AQR's 2017/18 Audit Quality Inspection Report on Deloitte LLP

"The overall results of our reviews of the firm's audits show that 76% were assessed as requiring no more than limited improvements, compared with 78% in 2016/17. Of the FTSE 350 audits we reviewed this year, we assessed 79% as achieving this standard compared with 82% in 2016/17. We are concerned at the lack of improvement in inspection results. The FRC's target is that at least 90% of these audits should meet this standard by 2018/19."

"Where we identified concerns in our inspections, they related principally to aspects of group audit work, audit work on estimates and financial models, and audit work on provisions and contingencies. During the year, the firm has continued to develop the use of "centres of excellence", increasing the involvement of the firm's specialists in key areas of the audit. We have no significant issues to report this year in most of the areas we reported on last year."

"The firm has revised its policies and procedures in response to the revised Ethical and Auditing Standards. We have identified some examples of good practice, as well as certain areas for improvement."

The firm has enhanced its policies and procedures in the following areas:

- Increased use of centres of excellence ("CoE") involving the firm's specialists, including new CoEs focusing on goodwill impairment (established in response to previous inspection findings) and corporate reporting, to address increasing complexity of financial reporting.
- Further methodology updates and additional guidance issued to the audit practice including the audit approach to pension balances, internal controls, data analytics, group audits and taxation.
- A new staff performance and development system was implemented with additional focus on regular timely feedback on performance, including audit quality.
- Further improvements to the depth and timeliness of root cause analysis on internal and external inspection findings.

Our key findings in the current year requiring action by the firm:

- Improve the group audit team's oversight and challenge of component auditors.
- Improve the extent of challenge of management's forecasts and the testing of the integrity of financial models supporting key valuations and estimates.
- Strengthen the firm's audit of provisions and contingencies.

Review of firm-wide procedures. The firm should:

• Enhance certain aspects of its independence systems and procedures.

Deloitte.

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