

# The Audit Findings for North Devon District Council

Year ended 31 March 2023

18 December 2023



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## Your key Grant Thornton team members are:

### Peter Barber

Key Audit Partner

E Peter.A.Barber@uk.gt.com

### Roz Apperley

Audit Manager

E Roz.E.Apperley@uk.gt.com

### Adams H Azubilla

Audit In-Charge

E Adams.H.Azubilla@uk.gt.com

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This Audit Findings presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260. Its contents have been discussed with management and Governance Committee.

Peter Barber  
For Grant Thornton UK LLP  
13 December 2023

The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Council or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

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# 1. Headlines

This table summarises the key findings and other matters arising from the statutory audit of North Devon District Council ('the Council').

## Financial Statements

Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- the group and Council's financial statements give a true and fair view of the financial position of the group and Council and the group and Council's income and expenditure for the year; and
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

We are also required to report whether other information published together with the audited financial statements (including the Annual Governance Statement (AGS and Narrative Report), is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

We commenced our post-statements audit in October 2023 and as at 13 December 2022 our audit is substantially complete. Our findings to date are summarised on pages 6 - 20.

Our work to date has not identified any material errors or adjustments to the financial statements. No adjustments have been identified that have resulted in an adjustment to the Council's Comprehensive Income and Expenditure Statement.

We have recommended a small number of audit adjustments to improve the presentation of the financial statements as detailed in Appendix D. We have also raised recommendations for management as a result of our audit work in Appendix B. Our follow up of recommendations from the prior year's audit are detailed in Appendix C.

The draft financial statements were submitted for audit in line with the agreed timetable, and were supported, in the main, by good quality working papers. We encountered difficulties in obtaining sufficient information to support the appropriateness of the increase in Land and Building valuations in the year and are continuing to work with officers and the Council's valuer to gain sufficient audit evidence to conclude these increases are reasonable. Our detailed report contains a recommendation to strengthen audit evidence in this area going forward.

We have excellent cooperation from officers at the Council and we would like to put on record our appreciation for this support throughout the audit process.

Our work is substantially complete and based on our work to date there are no matters of which we are aware that would require modification of our audit opinion [Appendix G] or material changes to the financial statements.

Subject to completing this work on asset valuations and concluding a small number of more minor audit procedures set out on page 6, we anticipate issuing our audit opinion in January 2024 following the Governance Committee meeting on the 9 January 2024.

We have concluded that the other information to be published with the financial statements, is consistent with our knowledge of your organisation and the financial statements we have audited.

Our work on the Council's value for money (VFM) arrangements is now complete and at the time of drafting this report is with management for comment. The outcome of our VFM work will be reported in our commentary on the Council's arrangements in our Auditor's Annual Report (AAR) that we are aiming to take to the same January 2024 Governance Committee meeting.

# 1. Headlines

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## Value for Money (VFM) arrangements

Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are required to report in more detail on the Council's overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit.

Auditors are required to report their commentary on the Council's arrangements under the following specified criteria:

- Improving economy, efficiency and effectiveness;
- Financial sustainability; and
- Governance

We have completed our VFM work, which is summarised on page 21, and our detailed commentary is set out in the separate Auditor's Annual Report, which is presented alongside this report. We are satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

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## Statutory duties

The Local Audit and Accountability Act 2014 ('the Act') also requires us to:

- report to you if we have applied any of the additional powers and duties ascribed to us under the Act; and
- to certify the closure of the audit.

We have not exercised any of our additional statutory powers or duties. We have completed the majority of work under the Code and expect to be able to certify the completion of the audit when we give our audit opinion.

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## Significant matters including additional work and impact on proposed audit fees

We did not encounter any significant difficulties or identify any significant matters arising during the vast majority of the audit. However, at the time of drafting this report our challenge to the carrying value of the Council's land and buildings has resulted in additional work on our part to gain assurance over the material accuracy of these statements. As work is ongoing, we will reflect this in our final fee considerations once all our work is complete.

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# 1. Headlines

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## National context – audit backlog

Nationally there have been significant delays in the completion of audit work and the issuing of audit opinions across the local government sector. Only 1% (5 of 467) of local government bodies had received audit opinions in time to publish their 2022/23 accounts by the deadline of 30 September 2023. We at Grant Thornton have a strong desire and a firm commitment to complete as many audits as soon as possible and to address the backlog of unsigned opinions.

Over the course of the last year, Grant Thornton has been working constructively with DLUHC, the FRC and the other audit firms to identify ways of rectifying the challenges which have been faced by our sector, and we recognise the difficulties these backlogs have caused authorities across the country. We have also published a report setting out our consideration of the issues behind the delays and our thoughts on how these could be mitigated. Please see [About time? \(grantthornton.co.uk\)](https://www.grantthornton.co.uk/about-time/)

We would like to thank everyone at the Council for their support in working with us to ensure information was provided in a timely way to ensure we did not fall behind and enable us to issue a timely audit opinion.

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## National context – level of borrowing

All Councils are operating in an increasingly challenging national context. With inflationary pressures placing increasing demands on Council budgets, there are concerns as Councils look to alternative ways to generate income. We have seen an increasing number of councils look to ways of utilising investment property portfolios as sources of recurrent income. Whilst there have been some successful ventures and some prudently funded by councils' existing resources, we have also seen some councils take excessive risks by borrowing sums well in excess of their revenue budgets to finance these investment schemes.

The impact of these huge debts on Councils, the risk of potential bad debt write offs and the implications of the poor governance behind some of these decisions are all issues which now have to be considered by auditors across local authority audits.

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## 2. Financial Statements

### Overview of the scope of our audit

This Audit Findings Report presents the observations arising from the audit that are significant to the responsibility of those charged with governance to oversee the financial reporting process, as required by International Standard on Auditing (UK) 260 and the Code of Audit Practice ('the Code'). Its contents will be discussed with management and the Governance Committee.

As auditor we are responsible for performing the audit, in accordance with International Standards on Auditing (UK) and the Code, which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

### Audit approach

Our audit approach was based on a thorough understanding of the Council's business and is risk based, and in particular included:

- An evaluation of the Council's internal controls environment, including its IT systems and controls;
- Substantive testing on significant transactions and material account balances, including the procedures outlined in this report in relation to the key audit risks

### Conclusion

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved, we anticipate issuing an unqualified audit opinion following the Governance Committee meeting on 9 January 2024. Subject to the outstanding items as detailed on page 3.

We have substantially completed our audit of your financial statements and subject to outstanding queries being resolved, we anticipate issuing our audit opinion in January 2024 following the Governance Committee meeting on 9 January 2024. These outstanding items include:

- completion of testing on land and buildings revaluations and investment property valuations;
- Letter of assurance from the Devon Pension Fund auditor expected 18 December 2023;
- Finalising our debtors testing;
- completion of final quality reviews of our audit file and satisfactory conclusion of any resultant queries.
- receipt of management representation letter; and
- review of the final set of financial statements



## 2. Financial Statements



### Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to the disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality levels have been updated from those detailed in the Audit Plan issued on 13 June 2023. Materiality levels have been updated in line with the draft 2022/23 accounts.

	Final	Planning
Materiality for the financial statements	£1,170,000	£1,080,000
Performance materiality	£870,000	£810,000
Trivial matters	£58,000	£50,000



## 2. Financial Statements: Significant risks

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

This section provides commentary on the significant audit risks communicated in the Audit Plan.

Risks identified in our Audit Plan	Commentary
Management override of controls	<p>We have:</p> <ul style="list-style-type: none"> <li>• evaluated the design and implementation of management controls over journals</li> <li>• analysed the journals listing and determined the criteria for selecting high risk unusual journals</li> <li>• identified and tested unusual journals made during the year and the accounts production stage for appropriateness and corroboration</li> <li>• gained an understanding of the accounting estimates and critical judgements applied by management and considered their reasonableness</li> </ul> <p>Our audit work including our review of journal entries and the related control environment has not identified any significant issues with regard to management override of controls. For all journals reviewed we concluded that they were appropriate transactions.</p> <p>As reported in previous years our work has identified that there is no preventative controls in place around journals authorisation. All journals can be posted and authorised by the same person. In previous years we have reported that a retrospective review of journals over £10,000 occurs quarterly. This is still the case for 2022-23.</p>



## 2. Financial Statements: Significant risks

Risks identified in our Audit Plan	Commentary
The revenue cycle includes fraudulent transactions (rebutted)	<p>We have:</p> <p>It was reported in our audit plan that we had determined there was no significant risk of material misstatement relating to the revenue recognition.</p> <p>We consider our rebuttal of revenue recognition to remain appropriate.</p>
Risk of fraud related to expenditure recognition PAF Practice Note 10 (rebutted)	<p>We have:</p> <p>It was reported in our audit plan that we had determined there was no significant risk of material misstatement relating to the expenditure recognition.</p> <p>We consider our rebuttal of expenditure recognition to remain appropriate.</p>
Valuation of Investment Property (Annual Revaluation)	<p>We have:</p> <ul style="list-style-type: none"> <li>• evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work;</li> <li>• evaluated the competence, capabilities and objectivity of the valuation expert;</li> <li>• written to the valuer to confirm the basis on which the valuation was carried out;</li> <li>• challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding, the Council's valuer's report and the assumptions that underpin the valuation; and</li> <li>• tested, on a sample basis, revaluations made during the year to see if they had been input correctly into the Council's asset register.</li> </ul> <p>At the time of writing this report we have not identified any significant issues that we need to bring to your attention, however our work in this area remains in progress.</p>

## 2. Financial Statements: Significant risks

### Risks identified in our Audit Plan

### Commentary

Valuation of land and buildings and the key assumptions and judgements that underpin this significant estimate

We have:

- evaluated management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work;
- evaluated the competence, capabilities and objectivity of the valuation expert;
- written to the valuer to confirm the basis on which the valuation was carried out;
- challenged the information and assumptions used by the valuer to assess completeness and consistency with our understanding, the Council's valuer's report and the assumptions that underpin the valuation; and
- tested, on a sample basis, revaluations made during the year to see if they had been input correctly into the Council's asset register.

At the time of writing this report our work remains in progress. The council has applied an 8.6% Building Cost Information Service (BCIS) indice uplift to all assets valued on a Depreciated Replacement Cost (DRC) basis. This encompassed both land and buildings. This 8.6% represents an all-encompassing average BCIS, devoid of any Public Sector or Location-specific nuances. Significant efforts have been invested in challenging the validity of applying a flat 8.6% BCIS to the DRC assets at North Devon District Council. The ongoing discourse has revealed a lack of sufficient appropriate audit evidence to substantiate the appropriateness of this 8.6% BCIS application for each DRC asset. Discussions continue as we seek to obtain sufficient and appropriate evidence to support the relevance of the 8.6% indices applied.

Looking ahead, it is critical that the council ensure there is a more nuanced approach to desktop valuations that fully supports the movement of individual assets valuations based on the unique characteristics and the location of the asset concerned. We have made a recommendation to this effect on page 27 of this report.

## 2. Financial Statements: Significant risks

### Risks identified in our Audit Plan

#### Valuation of pension fund net liability

The Council's pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant estimate in the financial statements. The pension fund net liability is considered a significant estimate due to the size of the numbers involved (£14m in the Council's balance sheet) and the sensitivity of the estimate to changes in key assumptions.

The methods applied in the calculation of the IAS 19 estimates are routine and commonly applied by all actuarial firms in line with the requirements set out in the Code of practice for local government accounting (the applicable financial reporting framework). We have therefore concluded that there is not a significant risk of material misstatement in the IAS 19 estimate due to the methods and models used in their calculation.

The source data used by the actuaries to produce the IAS 19 estimates is provided by administering authorities and employers. We do not consider this to be a significant risk as this is easily verifiable.

The actuarial assumptions used are the responsibility of the entity but should be set on the advice given by the actuary.

A small change in the key assumptions (discount rate, inflation rate, salary increase and life expectancy) can have a significant impact on the estimated IAS 19 liability. In particular the discount rate, where our consulting actuary has indicated that a 0.1% change in these two assumptions would have approximately 1.03% effect on the liability/surplus. We have therefore concluded that there is a significant risk of material misstatement in the IAS 19 estimate due to the assumptions used in their calculation. With regard to these assumptions we have therefore identified valuation of the Council's pension fund net liability as a significant risk.

### Commentary

We have:

- updated our understanding of the processes and controls put in place by management to ensure that the pension fund net liability is not materially misstated and evaluate the design of the associated controls;
- evaluated the instructions issued by management to their management expert (Barnett Waddingham "the actuary") for this estimate and the scope of the actuary's work;
- assessed the competence, capabilities and objectivity of the actuary who carried out the pension fund valuation;
- assessed the accuracy and completeness of the information provided by the to the actuary to estimate the liability;
- tested the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial reports; and
- undertaken procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report.

Our audit work to date has not identified any issues in respect of valuation of the pension liability. At the time of writing, we await receipt of the final assurances from the auditor of the Devon Pension Fund as to the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements for the LGPS only. This letter is expected on 18 December 2023.

## 2. Financial Statements: key judgements and estimates

This section provides commentary on key estimates and judgements in line with the enhanced requirements for auditors.

Significant judgement or estimate	Summary of management's approach	Audit Comments	Assessment
Land and Building valuations – £111.9m	<p>Other land and buildings comprises £63m of specialised assets such as theatres and museums, which are required to be valued at depreciated replacement cost (DRC) at year end, reflecting the cost of a modern equivalent asset necessary to deliver the same service provision. The remainder of other land and buildings (£48.9m) are not specialised in nature and are required to be valued at existing use in value (EUV) at year end. The Council has engaged the valuer to complete the valuation of properties as at 31 March 2023 on a five yearly cyclical basis. 100% of total assets were revalued during 2022/23.</p> <p>The total year end valuation of land and buildings was £111.9m, a net increase of £18.3m from 2021/22 (£93.6m).</p>	<p>We have carried out the following work in relation to this estimate in line with the revised ISA540 requirements:</p> <ul style="list-style-type: none"> <li>assessment of management's expert to ensure suitably qualified and independent;</li> <li>assessed the completeness and accuracy of the underlying information used to determine the estimate;</li> <li>assessed the appropriateness of any alternative site assumptions;</li> <li>assessed the consistency of estimate against market data; and</li> <li>assessed the adequacy of disclosure of estimate in the financial statements.</li> </ul> <p>This work is still in progress, as detailed on page 10 discussions around assets valued on a DRC basis are ongoing, we are also awaiting supporting evidence on one asset valued on an Existing Use Value (EUV) basis. No issues have arisen to date in relation to the EUV work undertaken.</p>	<b>In progress</b>

### Assessment

- [Dark Purple] We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
- [Blue] We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider optimistic
- [Grey] We consider the estimate is unlikely to be materially misstated however management's estimation process contains assumptions we consider cautious
- [Light Purple] We consider management's process is appropriate and key assumptions are neither optimistic or cautious

## 2. Financial Statements: key judgements and estimates

	Summary of management's approach	Audit Comments	Assessment
Investment Property Valuation - £5.2m	<p>The Council has engaged valuer to complete the valuation of properties as at 31 March 20223. In line with the code requirements of all investment properties being valued annually.</p> <p>The total year end valuation of investment property was £5.1m, a net increase of £0.3m from 2021/22 (£4.9m).</p>	<p>We have carried out the following work in relation to this estimate:</p> <ul style="list-style-type: none"> <li>• assessment of management's expert to ensure suitably qualified and independent;</li> <li>• assessed the completeness and accuracy of the underlying information used to determine the estimate;</li> <li>• assessed the appropriateness of any alternative site assumptions;</li> <li>• assessed the consistency of estimate against market data; and</li> <li>• assessed the adequacy of disclosure of estimate in the financial statements.</li> </ul> <p>Our work is still in progress of our ten investment properties tested we are waiting for further supporting information on three of these.</p>	In progress

### Assessment

- [Dark Purple] We disagree with the estimation process or judgements that underpin the estimate and consider the estimate to be potentially materially misstated
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## 2. Financial Statements: key judgements and estimates

Significant judgement or estimate	Summary of management's approach	Audit Comments	Assessment																								
<b>Net pension liability – £14.1million</b>	<p>The Council's net pension liability at 31 March 2023 is £14.1m (PY £64.45m) comprising the Devon Pension Fund Local Government funded defined benefit scheme. The Council uses Barnett Waddingham to provide actuarial valuations of the Council's assets and liabilities derived from this scheme. A full actuarial valuation is required every three years.</p> <p>The latest full actuarial valuation was completed in 2022. Given the significant value of the net pension fund liability (surplus), small changes in assumptions can result in significant valuation movements. There has been a £54.4m actuarial gain during 2022/23.</p>	<p>In assessing the estimate, we have considered the following:</p> <ul style="list-style-type: none"> <li>assessed management's expert to ensure they are suitably qualified and independent;</li> <li>assessed the actuary's approach to confirm reasonableness of approach;</li> <li>used an auditor's expert (PwC) to assess the methods and assumptions used by management's actuary (see table below for consideration of assumptions);</li> <li>gained assurance over the completeness and accuracy of the underlying information used to determine the estimate;</li> <li>assessed the impact of any changes to valuation method;</li> <li>assessed the reasonableness of decrease in estimate; and</li> <li>assessed the adequacy of disclosure of estimate in the financial statements.</li> </ul> <table border="1"> <thead> <tr> <th>Assumption</th> <th>Actuary Value</th> <th>PwC range</th> <th>Assessment</th> </tr> </thead> <tbody> <tr> <td>Discount rate</td> <td>4.80%</td> <td>4.80% – 4.85%</td> <td>●</td> </tr> <tr> <td>Pension increase rate</td> <td>2.95%</td> <td>2.65% - 2.95%</td> <td>●</td> </tr> <tr> <td>Salary growth</td> <td>3.95%</td> <td>3.95%</td> <td>●</td> </tr> <tr> <td>Life expectancy – Males currently aged 45/65</td> <td>Pensioners: 21.8 Non Pensioners: 23.1</td> <td>Pensioners: 20.5 – 21.2 Non Pensioners – 21.8 – 22.4</td> <td>●</td> </tr> <tr> <td>Life expectancy – Females currently aged 45/65</td> <td>Pensioners: 22.9 Non Pensioners: 24.4</td> <td>Pensioners: 22.8 – 23.4 Non Pensioners – 24.3 – 24.9</td> <td>●</td> </tr> </tbody> </table>	Assumption	Actuary Value	PwC range	Assessment	Discount rate	4.80%	4.80% – 4.85%	●	Pension increase rate	2.95%	2.65% - 2.95%	●	Salary growth	3.95%	3.95%	●	Life expectancy – Males currently aged 45/65	Pensioners: 21.8 Non Pensioners: 23.1	Pensioners: 20.5 – 21.2 Non Pensioners – 21.8 – 22.4	●	Life expectancy – Females currently aged 45/65	Pensioners: 22.9 Non Pensioners: 24.4	Pensioners: 22.8 – 23.4 Non Pensioners – 24.3 – 24.9	●	Light Purple
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### Assessment

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## 2. Financial Statements: Information Technology

This section provides an overview of results from our assessment of Information Technology (IT) environment and controls which included identifying risks from the use of IT related to business process controls relevant to the financial audit. This includes an overall IT General Control (ITGC) rating per IT system and details of the ratings assigned to individual control areas.

IT application	Level of assessment performed	Overall ITGC rating	ITGC control area rating			Related significant risks/other risks
			Security management	Technology acquisition, development and maintenance	Technology infrastructure	
Civica Financials	ITGC assessment (design and implementation effectiveness only)					Management override of controls
Technology Forge	ITGC assessment (design, implementation and operating effectiveness)					Property, plant and Equipment Valuations
iTrent	ITGC assessment (design and implementation effectiveness only)					Payroll

### Assessment

-  Significant deficiencies identified in IT controls relevant to the audit of financial statements
-  Non-significant deficiencies identified in IT controls relevant to the audit of financial statements/significant deficiencies identified but with sufficient mitigation of relevant risk
-  IT controls relevant to the audit of financial statements judged to be effective at the level of testing in scope
-  Not in scope for testing

## 2. Financial Statements: other communication requirements

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

<b>Issue</b>	<b>Commentary</b>
<b>Matters in relation to fraud</b>	We have previously discussed the risk of fraud with the Governance Committee. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit procedures.
<b>Matters in relation to related parties</b>	We are not aware of any related parties or related party transactions which have not been disclosed.
<b>Matters in relation to laws and regulations</b>	You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work.
<b>Written representations</b>	A letter of representation has been requested from the Council which is included in the Governance Committee papers.
<b>Audit evidence and explanations</b>	We encountered difficulties in obtaining sufficient information to support the appropriateness of the increase in Land and Buildings Valuations in the year and are continuing to work with officers and the Council's valuer to gain sufficient audit evidence to conclude these increases are reasonable.

## 2. Financial Statements: other communication requirements



Issue	Commentary
Confirmation requests from third parties	We requested from management permission to send confirmation requests to North Devon District Councils bank and related investment and borrowing entities. This permission was granted and the requests were sent. We have received positive confirmations back.
Accounting practices	We have evaluated the appropriateness of the Council's accounting policies, accounting estimates and financial statement disclosures. Our review found no material omissions in the financial statements.
Audit evidence and explanations/ significant difficulties	We have received timely responses from management in most areas. However, in our work on Land and Buildings revaluations we have had to provide significant challenge of the valuer on the DRC valuations as the valuer has not been able to provide evidence to support the key assumptions.

## 2. Financial Statements: other communication requirements



### Our responsibility

As auditors, we are required to “obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the entity's ability to continue as a going concern” (ISA (UK) 570).

Issue	Commentary
Going concern	<p>In performing our work on going concern, we have had reference to Statement of Recommended Practice – Practice Note 10: Audit of financial statements of public sector bodies in the United Kingdom (Revised 2020). The Financial Reporting Council recognises that for particular sectors, it may be necessary to clarify how auditing standards are applied to an entity in a manner that is relevant and provides useful information to the users of financial statements in that sector. Practice Note 10 provides that clarification for audits of public sector bodies.</p> <p>Practice Note 10 sets out the following key principles for the consideration of going concern for public sector entities:</p> <ul style="list-style-type: none"> <li>the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the entity's services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist, and so a straightforward and standardised approach for the consideration of going concern will often be appropriate for public sector entities</li> <li>for many public sector entities, the financial sustainability of the reporting entity and the services it provides is more likely to be of significant public interest than the application of the going concern basis of accounting. Our consideration of the Council's financial sustainability is addressed by our value for money work, which is covered elsewhere in this report.</li> </ul> <p>Practice Note 10 states that if the financial reporting framework provides for the adoption of the going concern basis of accounting on the basis of the anticipated continuation of the provision of a service in the future, the auditor applies the continued provision of service approach set out in Practice Note 10. The financial reporting framework adopted by the Council meets this criteria, and so we have applied the continued provision of service approach. In doing so, we have considered and evaluated:</p> <ul style="list-style-type: none"> <li>the nature of the Council and the environment in which it operates</li> <li>the Council's financial reporting framework</li> <li>the Council's system of internal control for identifying events or conditions relevant to going concern</li> <li>management's going concern assessment.</li> </ul> <p>On the basis of this work, we have obtained sufficient appropriate audit evidence to enable us to conclude that:</p> <ul style="list-style-type: none"> <li>a material uncertainty related to going concern has not been identified</li> <li>management's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.</li> </ul>

## 2. Financial Statements: other responsibilities under the Code

Issue	Commentary
Other information	<p>We are required to give an opinion on whether the other information published together with the audited financial statements including the Annual Governance Statement and Narrative Report is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.</p> <p>In our review of the narrative report, we have identified that it does not contain key financial and non-financial performance indicators, management will not be updating to include this information as they feel other areas of the accounts appropriately reflect this information. We plan to issue an unmodified opinion in this respect – refer to Appendix G.</p>
Matters on which we report by exception	<p>We are required to report on a number of matters by exception in a number of areas:</p> <ul style="list-style-type: none"> <li>• if the Annual Governance Statement does not comply with disclosure requirements set out in CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit,</li> <li>• if we have applied any of our statutory powers or duties.</li> <li>• where we are not satisfied in respect of arrangements to secure value for money and have not reported any significant weaknesses.</li> </ul> <p>We have nothing to report on these matters.</p>



## 2. Financial Statements: other responsibilities under the Code

Issue	Commentary
Specified procedures for Whole of Government Accounts	We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions. Note that work is not required as the Council does not exceed the threshold.
Certification of the closure of the audit	We intend to certify the closure of the 2022/23 audit of North Devon District Council in the audit report, as detailed in Appendix G.



# 3. Value for Money arrangements (VFM)

## Approach to Value for Money work for 2022/23

The National Audit Office issued its guidance for auditors in April 2020. The Code requires auditors to consider whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

When reporting on these arrangements, the Code requires auditors to structure their commentary on arrangements under the three specified reporting criteria.



### Improving economy, efficiency and effectiveness

Arrangements for improving the way the body delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



### Financial Sustainability

Arrangements for ensuring the body can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3–5 years)



### Governance

Arrangements for ensuring that the body makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the body makes decisions based on appropriate information

## Potential types of recommendations

A range of different recommendations could be made following the completion of work on the body's arrangements to secure economy, efficiency and effectiveness in its use of resources, which are as follows:



### Statutory recommendation

Written recommendations to the body under Section 24 (Schedule 7) of the Local Audit and Accountability Act 2014. A recommendation under schedule 7 requires the body to discuss and respond publicly to the report.



### Key recommendation

The Code of Audit Practice requires that where auditors identify significant weaknesses in arrangements to secure value for money they should make recommendations setting out the actions that should be taken by the body. We have defined these recommendations as 'key recommendations'.



### Improvement recommendation

These recommendations, if implemented should improve the arrangements in place at the body, but are not made as a result of identifying significant weaknesses in the body's arrangements

## Conclusions

We have completed our VFM work and our detailed commentary is set out in the separate Auditor's Annual Report, which is presented alongside this report. No significant weaknesses in arrangements have been identified.

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# 4. Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. We have complied with the Financial Reporting Council's Ethical Standard and confirm that we, as a firm, and each covered person, are independent and are able to express an objective opinion on the financial statements.

We confirm that we have implemented policies and procedures to meet the requirements of the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

Details of fees charged are detailed in Appendix F.

## Transparency

Grant Thornton publishes an annual Transparency Report, which sets out details of the action we have taken over the past year to improve audit quality as well as the results of internal and external quality inspections. For more details see [Grant Thornton International Transparency report 2023](#).

# 4. Independence and ethics

## Audit and non-audit services

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Council. The following non-audit services were identified which were charged from the beginning of the financial year to date, as well as the threats to our independence and safeguards that have been applied to mitigate these threats.

Service	Fees £	Threats identified	Safeguards
<b>Audit related</b>			
Certification of Housing Benefit Claim	£24,400	Self-Interest (because this is a recurring fee)  Self review (because GT provides audit services)	The level of this recurring fee taken on its own is not considered a significant threat to independence as the fee for this work is expected to be £24,400 in comparison to the total fee for the audit of £62,350 and in particular relative to Grant Thornton UK LLP's turnover overall. Further, it is a fixed fee and there is no contingent element to it. These factors all mitigate the perceived self-interest threat to an acceptable level.  To mitigate against the self review threat, the timing of certification work is done after the audit has completed, materiality of the amounts involved to our opinion and unlikelihood of material errors arising and the Council has informed management who will decide whether to amend returns for our findings and agree the accuracy of our reports on grants.

# 4. Independence and ethics

As part of our assessment of our independence we note the following matters:

Matter	Conclusion
Relationships with Grant Thornton	We are not aware of any relationships between Grant Thornton and the Company that may reasonably be thought to bear on our integrity, independence and objectivity
Relationships and Investments held by individuals	We have not identified any potential issues in respect of personal relationships with the Group or investments in the Group held by individuals
Employment of Grant Thornton staff	We are not aware of any former Grant Thornton partners or staff being employed, or holding discussions in respect of employment, by the Group as a director or in a senior management role covering financial, accounting or control related areas.
Business relationships	We have not identified any business relationships between Grant Thornton and the Group
Contingent fees in relation to non-audit services	No contingent fee arrangements are in place for non-audit services provided
Gifts and hospitality	We have not identified any gifts or hospitality provided to, or received from, a member of the Group's board, senior management or staff.

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention and consider that an objective reasonable and informed third party would take the same view. The firm and each covered person and network firms have complied with the Financial Reporting Council's Ethical Standard and confirm that we are independent and are able to express an objective opinion on the financial statements

# Appendices

- A. Communication of audit matters to those charged with governance
- B. Action plan – Audit of Financial Statements
- C. Follow up of prior year recommendations
- D. Audit Adjustments
- E. Fees and non-audit services
- F. Auditing developments
- G. Management Letter of Representation
- H. Audit opinion
- I. Audit letter in respect of delayed VFM work

# A. Communication of audit matters to those charged with governance

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks	•	
Confirmation of independence and objectivity	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant findings from the audit		•
Significant matters and issue arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud involving management and/or which results in material misstatement of the financial statements		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•
Expected modifications to the auditor's report, or emphasis of matter		•

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Findings, outlines those key issues, findings and other matters arising from the audit, which we consider should be communicated in writing rather than orally, together with an explanation as to how these have been resolved.

## Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

## Distribution of this Audit Findings report

Whilst we seek to ensure our audit findings are distributed to those individuals charged with governance, we are also required to distribute our findings to those members of senior management with significant operational and strategic responsibilities. We are grateful for your specific consideration and onward distribution of our report to all those charged with governance.



## B. Action Plan – Audit of Financial Statements

We have identified 7 recommendations for the Council as a result of issues identified during the course of our audit. We have agreed our recommendations with management. The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Assessment	Issue and risk	Recommendations
	In our work on Land and Buildings revaluations we have identified that an 8.6% BCIS has been applied to all assets valued on a DRC basis. This 8.6% represents an all-encompassing average BCIS, devoid of any Public Sector or Location-specific nuances. In our efforts to confirm the appropriateness of the application of the 8.6% the council have been unable to provide sufficient and appropriate evidence to support the 8.6% BCIS applied. Discussions continue as we seek to obtain sufficient and appropriate evidence to support the relevance of the 8.6% indices applied.	<p>It is critical that the council ensure there is a more nuanced approach to desktop valuations that fully supports the movement of individual assets valuations based on the unique characteristics and the location of the asset concerned.</p> <p><b>Management response</b></p> <p>Having provided additional and sufficient evidence on the professional valuer's opinion that the application of the 8.6% applied on each individual DRC valued asset is materially accurate, we will take this approach forwards for future year's audits.</p>
	In our work on cash we have noted a difference between the accounts and the supporting information provided of £32k. This related to £32k that was not disclosed within the accounts	<p>The council should ensure that all cash is appropriately accounted for at year end through maintaining appropriate records.</p> <p><b>Management response</b></p> <p>Management identified the £32k error in the 2022-23 bank reconciliation where the £32k was included as a debtor rather than cash &amp; cash equivalents - this has been amended in the 2023-24 statements.</p>
	It was noted during our ITGC enquiries that there was a lack of formal process in the use of the IT privilege account on Civica, this poses a risk of unapproved usage of the privilege account which could impact data integrity.	<p>The council should ensure that access to this account is reviewed and there is appropriate approval processes in place.</p> <p><b>Management response</b></p> <p>The Finance Manager will review and document procedure around the Civica IT privilege account to ensure usage is appropriate.</p>
	It was identified during our review of user rights that administrative rights on Civica have been granted to members of Finance Team who have financial responsibilities. Combining both financial privileges and administrative privileges on the system is considered as a segregation of duties conflict which creates a risk that system-enforced internal controls can be by-passed.	<p>The council should ensure that no members of finance have admin user access rights.</p> <p><b>Management response</b></p> <p>From an operational point of view it really needs to be finance staff that have the "update access" as we understand the functionality of the system, the ICT members wouldn't have the practical experience to administer and grant appropriate access levels and understand the complexity of the finance system. The levels referred to are "Business operations access", "transaction code access" and "Business Object permissions", all of which require detailed understanding of the finance function.</p>

### Controls

- High – Significant effect on financial statements
- Medium – Limited Effect on financial statements
- Low – Best practice

# B. Action Plan – Audit of Financial Statements

Assessment	Issue and risk	Recommendations
	<p>In our work on leases, we identified some small differences between the lease agreements and the leases disclosure.</p> <p>Whilst the differences were not significant, there is a risk that financial statements disclosures are incorrect.</p>	<p>Management should ensure that the leases disclose is reviewed against the underlying lease information and appropriately updated at least annually.</p> <p><b>Management response</b></p> <p>Whilst not material, work is on-going between the Accountants and Property Officers to ensure lease information is correct and up to date.</p>
	<p>We have identified a number of assets with a zero net book value where the asset is still in use.</p> <p>There is a risk that useful economic lives are incorrect, leading to incorrect depreciation charges, or a risk that assets remain on the register that are no longer in use.</p>	<p>Management should ensure that asset lives applied are appropriate and also undertake reviews of the zero net book value assets and consider whether the asset is still in use.</p> <p><b>Management response</b></p> <p>This is within both Plant and Equipment where some assets exceeded the original estimated economic useful life, where management have then decided it was economically viable to continue to use the asset rather than replacing at that point. The only assets the Council have with a zero value are “Land” only assets where there is no depreciation.</p>
	<p>In our work on grants received in advance (GRIA) we identified a grant that had been recognised as a GRIA when in fact no monies had been received by the council in relation to this. The impact of this is trivial.</p>	<p>The Council should ensure that a Grant is only recognised as a grant received in advance when money has been received in advance of conditions being met</p> <p><b>Management response</b></p> <p>This related to a Section 106 payment where it is was due to the Council prior to year-end and we raised a debtor (accruals accounting) that remained unpaid at year end and in our opinion this is the correct treatment.</p>

## Controls

- High – Significant effect on financial statements
- Medium – Limited Effect on financial statements
- Low – Best practice

# C. Follow up of prior year recommendations

We identified the following issues in the audit of North Devon District Council's 2021/22 financial statements, which resulted in two recommendations being reported in our 2021/22 Audit Findings report. We are pleased to report that management have implemented all of our recommendations.

Assessment	Issue and risk previously communicated	Update on actions taken to address the issue
✓	<p>Whilst testing cash we were made aware that monthly bank reconciliations have not been fully completed for 6 months of the 21/22 financial year. This was due to software issues.</p> <p>We do note that the year end bank reconciliation was completed, and monthly reconciliations were completed to where differences reported ranged between £5,000 to £20,000.</p> <p>Bank reconciliations are an integral part of the Council's overall control environment and are an important part of protecting against and detecting fraud.</p> <p>This was deemed a significant deficiency due to the pervasive nature of cash.</p>	There was still software issues in the first 5 months of 2022/23, however after August 2022 bank reconciliations have been appropriately produced.
X	As reported in previous years there is no preventative controls in place around journals authorization. In previous years we have recommended that the council should review arrangements for authorising journals below £10,000.	Management have reviewed journals below £10,000 in 2022/23. However, there is still no preventative system controls.
✓	We noted as part of our IT review that the information and security standards policy has not been updated since May 2018 and does not have a specific date for refresh.	This was reviewed in 2022.

## Assessment

- ✓ Action completed
- X Not yet addressed

# D. Audit Adjustments

We are required to report all non trivial misstatements to those charged with governance, whether or not the accounts have been adjusted by management.

## Impact of adjusted and unadjusted misstatements

At the time of writing this report there are no adjusted or unadjusted adjustment misstatements to bring to your attention. There are also no prior year unadjusted misstatements.

## Misclassification and disclosure changes

The table below provides details of misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

Disclosure/issue/Omission	Auditor recommendations	Adjusted?												
In our work on the cashflow we identified a number of small changes to be made. "Adjustments to net surplus or deficit on the provision of services for non cash movements" entered as £10,167k and should be £10,443k. "Net cash flows from Operating Activities (Note 28)" updated from £12,678k to £12,954k. This occurred due to "Other non-cash items" in note 28 being incorrectly entered as -£71k and this should be £93k. Financing activities (Note 30) entered as -£6,813k and should be -£7,089k.	We recommend that management update the disclosure for these changes. <b>Management response</b> Agreed and updated in revised SoA produced.	✓												
In our work on financial instruments we identified that debts relating to Praxis of £478k was incorrectly excluded from the total included in debtors in the financial instruments note 19. This results in an increase in the Total included in Debtors from £4,741k to £5,219k.	We recommended that management amend the disclosure to appropriately include the debts. <b>Management response</b> Agreed and updated in revised SoA produced.	✓												
In our work on pensions we identified a small number of changes due to signage and totalling errors in note 42.	We recommend that management update the disclosure for these changes. <b>Management response</b> Agreed and updated in revised SoA produced.	✓												
<table border="1"> <thead> <tr> <th>Fund History</th> <th>Draft Accounts</th> <th>Updated</th> </tr> </thead> <tbody> <tr> <td>Local Government Pension Scheme</td> <td>11,616k</td> <td>(11,616k)</td> </tr> <tr> <td>Discretionary Benefits</td> <td>2,471k</td> <td>(2,471k)</td> </tr> <tr> <td>Total</td> <td>14,087k</td> <td>(14,087k)</td> </tr> </tbody> </table>	Fund History	Draft Accounts	Updated	Local Government Pension Scheme	11,616k	(11,616k)	Discretionary Benefits	2,471k	(2,471k)	Total	14,087k	(14,087k)		
Fund History	Draft Accounts	Updated												
Local Government Pension Scheme	11,616k	(11,616k)												
Discretionary Benefits	2,471k	(2,471k)												
Total	14,087k	(14,087k)												
A number of presentational and typographical changes were identified within the draft financial statements, Annual Report and Narrative Report which have been corrected by management in order to aid transparency.	We brought these to the attention of management, who adjusted most of these errors. <b>Management response</b> Agreed and updated in revised SoA produced.	✓												

## E. Fees and non-audit services

We confirm below our final fees charged for the audit.

<b>Audit fees</b>	<b>Proposed fee</b>	<b>Final fee</b>
Scale fee published by PSAA 2022-23	£44,000	
Value for Money audit – new NAO requirements	£9,000	
Increased audit requirements of revised ISA 540	£2,100	
Enhanced audit procedures on journals testing	£3,000	
Increased audit requirements of revised ISA 315	£3,000	
Enhanced audit procedures for Payroll – Change of circumstances	£500	
Enhanced audit procedures for Collection Fund - reliefs testing	£750	
<b>Total proposed audit fees 2022/23 (excluding VAT)</b>	<b>£62,350</b>	<b>TBC</b>

The fees do reconcile to the financial statements. This is due to the late communication of the 2022/23 audit fee. The fee disclosed in the accounts is the 2021/22 fee, a footnote has been added to reflect the fee for 2022/23 of £62,350.

## E. Fees and non-audit services

<b>Non-audit fees for other services</b>	<b>Final fee – 2021/22</b>	<b>Proposed fee – 2022/23</b>	<b>Final fee – 2022/23</b>
<b>Audit Related Services</b>			
Certification of Housing Benefit Subsidy	£23,038	£24,400	TBC
<b>Total non-audit fees (excluding VAT)</b>	<b>£23,038</b>	<b>£24,400</b>	<b>TBC</b>

None of the above services were provided on a contingent fee basis.

The non-audit fee disclosed in the accounts is the 2021/22 Housing Benefit fee due to the timing of completion of the Housing Benefit Certification work.

This covers all services provided by us and our network to the group/company, its directors and senior management and its affiliates, and other services provided to other known connected parties that may reasonably be thought to bear on our integrity, objectivity or independence. (The FRC Ethical Standard (ES 1.69))



# F. Auditing developments

## Revised ISAs

There are changes to the following ISA (UK):

ISA (UK) 315 (Revised July 2020) 'Identifying and Assessing the Risks of Material Misstatement'

**This impacts audits of financial statement for periods commencing on or after 15 December 2021.**

ISA (UK) 220 (Revised July 2021) 'Quality Management for an Audit of Financial Statements'

ISA (UK) 240 (Revised May 2021) 'The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements'

A summary of the impact of the key changes on various aspects of the audit is included below:

These changes will impact audit for audits of financial statement for periods commencing on or after 15 December 2022.

Area of change	Impact of changes
Risk assessment	The nature, timing and extent of audit procedures performed in support of the audit opinion may change due to clarification of: <ul style="list-style-type: none"> <li>the risk assessment process, which provides the basis for the assessment of the risks of material misstatement and the design of audit procedures</li> <li>the identification and extent of work effort needed for indirect and direct controls in the system of internal control</li> <li>the controls for which design and implementation needs to be assess and how that impacts sampling</li> <li>the considerations for using automated tools and techniques.</li> </ul>
Direction, supervision and review of the engagement	Greater responsibilities, audit procedures and actions are assigned directly to the engagement partner, resulting in increased involvement in the performance and review of audit procedures.
Professional scepticism	The design, nature, timing and extent of audit procedures performed in support of the audit opinion may change due to: <ul style="list-style-type: none"> <li>increased emphasis on the exercise of professional judgement and professional scepticism</li> <li>an equal focus on both corroborative and contradictory information obtained and used in generating audit evidence</li> <li>increased guidance on management and auditor bias</li> <li>additional focus on the authenticity of information used as audit evidence</li> <li>a focus on response to inquiries that appear implausible</li> </ul>
Definition of engagement team	The definition of engagement team when applied in a group audit, will include both the group auditors and the component auditors. The implications of this will become clearer when the auditing standard governing special considerations for group audits is finalised. In the interim, the expectation is that this will extend a number of requirements in the standard directed at the 'engagement team' to component auditors in addition to the group auditor. <ul style="list-style-type: none"> <li>Consideration is also being given to the potential impacts on confidentiality and independence.</li> </ul>
Fraud	The design, nature timing and extent of audit procedures performed in support of the audit opinion may change due to: <ul style="list-style-type: none"> <li>clarification of the requirements relating to understanding fraud risk factors</li> <li>additional communications with management or those charged with governance</li> </ul>
Documentation	The amendments to these auditing standards will also result in additional documentation requirements to demonstrate how these requirements have been addressed.

# G. Audit opinion

Our audit opinion is included below.

We anticipate we will provide the Council with an unmodified audit report.

## **Independent auditor's report to the members of North Devon District Council**

### **Report on the audit of the financial statements**

#### **Opinion on financial statements**

We have audited the financial statements of North Devon District Council (the 'Authority') for the year ended 31 March 2023, which comprise the Comprehensive Income and Expenditure Statement, the Movement in Reserves Statement, the Balance Sheet, the Cash Flow Statement, the Collection Fund and notes to the accounts, including a summary of significant accounting. 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 2022/23.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the Authority as at 31 March 2023 and of its expenditure and income for the year then ended;
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23; and
- have been prepared in accordance with the requirements of the Local Audit and Accountability Act 2014.

#### **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law, as required by the Code of Audit Practice (2020) ("the Code of Audit Practice") approved by the Comptroller and Auditor General. Our responsibilities under those standards are further described in the 'Auditor's responsibilities for the audit of the financial statements' section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Conclusions relating to going concern**

We are responsible for concluding on the appropriateness of the Chief Financial Officer's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Authority's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the auditor's opinion. Our conclusions are based on the audit evidence obtained up to the date of our report. However, future events or conditions may cause the Authority to cease to continue as a going concern.

## G. Audit opinion

In our evaluation of the Chief Financial Officer's conclusions, and in accordance with the expectation set out within the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 that the Authority's financial statements shall be prepared on a going concern basis, we considered the inherent risks associated with the continuation of services provided by the Authority. In doing so we had regard to the guidance provided in Practice Note 10 Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2022) on the application of ISA (UK) 570 Going Concern to public sector entities. We assessed the reasonableness of the basis of preparation used by the Authority and the Authority's disclosures over the going concern period.

In auditing the financial statements, we have concluded that the Chief Financial Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Authority's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Chief Financial Officer with respect to going concern are described in the relevant sections of this report.

### **Other information**

The other information comprises the information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. The Chief Financial Officer is responsible for the other information. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

### **Other information we are required to report on by exception under the Code of Audit Practice**

Under the Code of Audit Practice published by the National Audit Office in April 2020 on behalf of the Comptroller and Auditor General (the Code of Audit Practice) we are required to consider whether the Annual Governance Statement does not comply with 'Delivering Good Governance in Local Government Framework 2016 Edition' published by CIPFA and SOLACE, or is misleading or inconsistent with the information of which we are aware from our audit. We are not required to consider whether the Annual Governance Statement addresses all risks and controls or that risks are satisfactorily addressed by internal controls.

We have nothing to report in this regard.

# G. Audit opinion

## **Opinion on other matters required by the Code of Audit Practice**

In our opinion, based on the work undertaken in the course of the audit of the financial statements, the other information published together with the financial statements in the Statement of Accounts for the financial year for which the financial statements are prepared is consistent with the financial statements.

## **Matters on which we are required to report by exception**

Under the Code of Audit Practice, we are required to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make a written recommendation to the Authority under section 24 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014 in the course of, or at the conclusion of the audit; or
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014, in the course of, or at the conclusion of the audit.

We have nothing to report in respect of the above matters.

## **Responsibilities of the Authority and the Chief Financial Officer**

As explained more fully in the Statement of Responsibilities set out on page 18, the Authority is required to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this authority, that officer is the Chief Financial Officer. The Chief Financial 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 2022/23, for being satisfied that they give a true and fair view, and for such internal control as the Chief Financial Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Chief Financial Officer is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless they have been informed by the relevant national body of the intention to dissolve the Authority without the transfer of its services to another public sector entity.

# G. Audit opinion

## Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. Irregularities, including fraud, are instances of non-compliance with laws and regulations. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Authority and determined that the most significant which are directly relevant to specific assertions in the financial statements are those related to the reporting frameworks (the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2022/23, the Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015 and the Local Government Act 2003).

We enquired of management and the Governance Committee, concerning the Authority's policies and procedures relating to:

- the identification, evaluation and compliance with laws and regulations;
- the detection and response to the risks of fraud; and
- the establishment of internal controls to mitigate risks related to fraud or non-compliance with laws and regulations.

We enquired of management, internal audit and the Governance committee, whether they were aware of any instances of non-compliance with laws and regulations or whether they had any knowledge of actual, suspected or alleged fraud.

We assessed the susceptibility of the Authority's financial statements to material misstatement, including how fraud might occur, by evaluating management's incentives and opportunities for manipulation of the financial statements. This included the evaluation of the risk of management override of controls. We determined that the principal risks were in relation to journals, accounting estimates and critical judgements made by management.

Our audit procedures involved:

- evaluation of the design effectiveness of controls that management has in place to prevent and detect fraud,
- journal entry testing, with a focus on management override of controls,
- challenging assumptions and judgements made by management in its significant accounting estimates in respect of land and buildings, investment properties, and defined benefit pensions liability valuations; and
- assessing the extent of compliance with the relevant laws and regulations as part of our procedures on the related financial statement item.

These audit procedures were designed to provide reasonable assurance that the financial statements were free from fraud or error. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error and detecting irregularities that result from fraud is inherently more difficult than detecting those that result from error, as fraud may involve collusion, deliberate concealment, forgery or intentional misrepresentations. Also, the further removed non-compliance with laws and regulations is from events and transactions reflected in the financial statements, the less likely we would become aware of it.

# G. Audit opinion

We communicated relevant laws and regulations and potential fraud risks to all engagement team members. We remained alert to any indications of non-compliance with laws and regulations, including fraud, throughout the audit.

Our assessment of the appropriateness of the collective competence and capabilities of the engagement team included consideration of the engagement team's.

- understanding of, and practical experience with audit engagements of a similar nature and complexity through appropriate training and participation
- knowledge of the local government sector
- understanding of the legal and regulatory requirements specific to the Authority including:
  - the provisions of the applicable legislation
  - guidance issued by CIPFA/LASAAC and SOLACE
  - the applicable statutory provisions.

In assessing the potential risks of material misstatement, we obtained an understanding of:

- the Authority's operations, including the nature of its income and expenditure and its services and of its objectives and strategies to understand the classes of transactions, account balances, expected financial statement disclosures and business risks that may result in risks of material misstatement.
- the Authority's control environment, including the policies and procedures implemented by the Authority to ensure compliance with the requirements of the financial reporting framework.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditor's report.

## **Report on other legal and regulatory requirements – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources**

### **Matter on which we are required to report by exception – the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources**

Under the Code of Audit Practice, we are required to report to you if, in our opinion, we have not been able to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2023.

We have nothing to report in respect of the above matter.

### **Responsibilities of the Authority**

The Authority is responsible for putting in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

## **Auditor's responsibilities for the review of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources**

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to be satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

We undertake our review in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in January 2023. This guidance sets out the arrangements that fall within the scope of 'proper arrangements'. When reporting on these arrangements, the Code of Audit Practice requires auditors to structure their commentary on arrangements under three specified reporting criteria:

- Financial sustainability: how the Authority plans and manages its resources to ensure it can continue to deliver its services;
- Governance: how the Authority ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness: how the Authority uses information about its costs and performance to improve the way it manages and delivers its services.

We document our understanding of the arrangements the Authority has in place for each of these three specified reporting criteria, gathering sufficient evidence to support our risk assessment and commentary in our Auditor's Annual Report. In undertaking our work, we consider whether there is evidence to suggest that there are significant weaknesses in arrangements.

## **Report on other legal and regulatory requirements – Audit certificate**

We certify that we have completed the audit of North Devon District Council for the year ended 31 March 2023 in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice.

## **Use of our report**

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the Authority's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Signature:

Peter Barber Key Audit Partner

for and on behalf of Grant Thornton UK LLP, Local Auditor

Bristol

Date:



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