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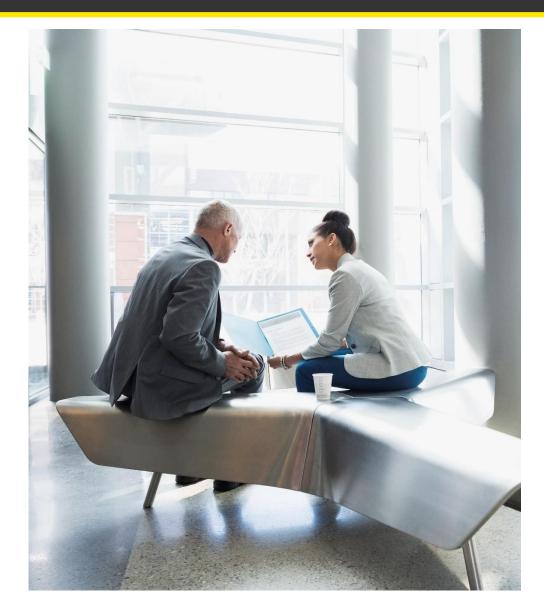
Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website (www.psaa.co.uk). [OR As part the Auditor Engagement process, we have agreed with you the respective responsibilities of auditors and audited bodies. Copies of the Engagement Letter and Terms and Conditions of our appointment are available from the Chief Executive or via the bodies minutes on their website].

This Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The 'Terms of Appointment (updated April 2018)' issued by PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Audit Results Report is prepared in the context of the Statement of responsibilities / Terms and Conditions of Engagement. It is addressed to the Members of the audited body, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure - If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Hywel Ball, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.





Executive Summary

We are required to issue an annual audit letter to the London Borough of Bromley Council (the Council) following completion of our audit procedures for the year ended 31 March 2020.

Covid-19 had an impact on a number of aspects of our 2019/20 audit. We set out these key impacts below.

Area of impact	Commentary	
Impact on the delivery of the audit		
► Changes to reporting timescales	As a result of Covid-19, new regulations, the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 N 404, have been published and came into force on 30 April 2020. This announced a change to publication date for final, audited accounts from 31 July to 30 November 2020 for all relevant authorities.	
Impact on our risk assessment		
▶ Valuation of Property Plant and Equipment	The Royal Institute of Chartered Surveyors (RICS), the body setting the standards for property valuations, issued guidance to valuers highlighting that the uncertain impact of Covid-19 on markets might cause a valuer to conclude that there is a material uncertainty. Caveats around this material uncertainty have been included in the year-end valuation reports produced by the Council's external valuer. We consider that the material uncertainties disclosed by the valuer gave rise to an additional risk relating to disclosures on the valuation of property, plant and equipment.	
▶ Disclosures on Going Concern	Financial plans for 2020/21, future years and medium term financial plans need revision for Covid-19. We considered the unpredictability of the current environment gave rise to a risk that the council would not appropriately disclose the key factors relating to going concern, underpinned by managements assessment with particular reference to Covid-19 and the Council's actual year end financial position and performance.	
▶ Events after the balance sheet date	We identified an increased risk that further events after the balance sheet date concerning the ongoing Covid-19 pandemic will need to be disclosed. The amount of detail required in the disclosure needed to reflect the specific circumstances of the Council.	
Impact on the scope of our audit		
▶ Information Produced by the Entity (IPE)	We identified an increased risk around the completeness, accuracy, and appropriateness of information produced by the entity due to the inability of the audit team to verify original documents or re-run reports on-site from the Council's systems. We undertook the following to address this risk:	
	► Used the screen sharing function of Microsoft Teams to evidence re-running of reports used to generate the IPE we audited; and	
	 Agree IPE to scanned documents or other system screenshots. 	
► Consultation requirements	Additional EY consultation requirements concerning the impact on auditor reports. The changes to audit risks and audit approach changed the level of work we needed to perform.	

Executive Summary (cont'd)

The tables below set out the results and conclusions on the significant areas of the audit process.

Area of Work Opinion on the Council's and Pension Fund's:	Conclusion		
► Financial statements	Unqualified - the financial statements give a true and fair view of the financial position of the Council and Pension Fund as at 31 March 2020 and of its expenditure and income for the year then ended.		
	We cannot formally conclude the audit and issue an audit certificate as we have not yet completed the work necessary to conclude the objection to the Council's 2018/19 Statement of Accounts. It is our view that even if the objection were resolved in the objector's favour, this would not materially affect the Statement of Accounts.		
► Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts.		
► Concluding on the Council's arrangements for securing economy, efficiency and effectiveness	We are unable to form a conclusion on whether we are satisfied that, in all significant respects, the London Borough of Bromley put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2019 until we complete the work necessary to conclude the objection.		
Area of Work	Conclusion		
Reports by exception:			
► Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the Council.		
► Public interest report	We had no matters to report in the public interest.		
► Written recommendations to the Council, which should be copied to the Secretary of State	We had no matters to report.		
► Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report.		

Executive Summary (cont'd)

Area of Work	Conclusion	
Reporting to the National Audit Office (NAO) on our review of the Council's Whole of Government Accounts return (WGA).	We were unable to report to the NAO on our review of the Council's WGA due to the delay in the completion of the audit.	
Area of Work	Conclusion	
Issued a report to those charged with governance of the Council communicating significant findings resulting from our audit.	Our Audit Results Report was issued on 14 February 2023 for the Council and on 5 April 2022 for the Pension Fund.	
Issued a certificate that we have completed the audit in	We have received an objection to the 2018/19 Statement of Accounts from a member of the public.	
accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	We cannot formally conclude the audit and issue an audit certificate for 2019/20 as we have not yet completed the work necessary to conclude the objection to the Council's 2018/19 Statement of Accounts. It is our view that even if the objection were resolved in the objector's favour, this would not materially affect the Statement of Accounts. We are unable to form a conclusion on whether we are satisfied that, in all significant respects, the London Borough of Bromley put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020 until we complete the work necessary to conclude the objection.	
	Until we have completed these procedures, we are unable to certify that we have completed the audit of the accounts in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.	

We would like to take this opportunity to thank the Council and Pension Fund's staff for their assistance during the course of our work.

Janet Dawson Partner

For and on behalf of Ernst & Young LLP

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Purpose

The Purpose of this Letter

The purpose of this annual audit letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the Council.

We have already reported the detailed findings from our audit work in our 2019/20 Audit Results Report to the 8 March 2023 Audit and Risk Committee, representing those charged with governance. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the Council.

Responsibilities

Responsibilities of the Appointed Auditor

Our 2019/20 audit work has been undertaken in accordance with the Audit Plan that we issued on 1 July 2020 and is conducted in accordance with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office.

As auditors we are responsible for:

- Expressing an opinion:
 - ▶ On the 2019/20 financial statements including the pension fund; and
 - ▶ On the consistency of other information published with the financial statements.
- Forming a conclusion on the arrangements the Council has to secure economy, efficiency and effectiveness in its use of resources.
- ► Reporting by exception:
 - ▶ If the annual governance statement is misleading or not consistent with our understanding of the Council;
 - ► Any significant matters that are in the public interest;
 - Any written recommendations to the Council, which should be copied to the Secretary of State; and
 - ▶ If we have discharged our duties and responsibilities as established by the Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the National Audit Office (NAO) on your Whole of Government Accounts return. The extent of our review and the nature of our report are specified by the NAO.

Responsibilities of the Council

The Council is responsible for preparing and publishing its statement of accounts accompanied by an Annual Governance Statement (AGS). In the AGS, the Council reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The Council is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.



Financial Statement Audit

Key Issues

The Council's Statement of Accounts is an important tool for the Council to show how it has used public money and how it can demonstrate its financial management and financial health.

We audited the Council and Pension Fund's Statement of Accounts in line with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office and issued an ungualified audit report on 2 May 2023.

Our detailed findings were reported to the 8 March 2023 Audit and Risk Committee.

The key issues identified as part of our audit were as follows:

Significant Risk

Misstatements due to fraud or error

The financial statements as a whole are not free of material misstatements whether caused by fraud or error. As identified in ISA (UK and Ireland) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively. We identify and respond to this fraud risk on every audit engagement.

For the Authority, we have assessed that this risk could manifest in:

- ➤ Inappropriate journal entries; specifically manual journals posted by management in the preparation of the financial statements.
- Significantly unusual transactions entered into by management that are outside of the normal scope of business of the Authority.
- Management bias in key accounting estimates and judgements.

Conclusion

We did not identify any:

- material weaknesses in controls or evidence of material management override;
- instances of inappropriate judgements being applied; or
- any other transactions during our audit which appear unusual or outside the Authority's normal course of business.

The key issues identified as part of our audit were as follows: (cont'd)

Significant Risk

Risk of fraud in revenue and expenditure recognition

Under ISA240 there is also a presumed risk that revenue may be misstated due to improper recognition of revenue. In the public sector, this requirement is modified by Practice Note 10, issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.

For London Borough of Bromley, we consider this specific risk to be present in:

- Additions to property, plant and equipment and Revenue Expenditure Financed from Capital Under Statute (REFCUS).
- > Seek to identify and understand the basis for any significant journals transferring expenditure from revenue to capital codes on the general ledger at the end of the year.
- ➤ We have considered the capitalisation of revenue expenditure on property, plant and equipment as a specific area of risk given the extent of the Authority's capital programme.

Conclusion

Our approach focused on:

- > selecting a sample of PPE additions to test and confirm the item was appropriate to capitalise
- > through agreement to evidence such as invoices and capital expenditure authorisations.
- >> selecting a sample of REFCUS items to test to confirm the appropriateness of the
- classification of these items
- > performing journals testing, we challenged entries that could be indicative of inappropriate
- > capitalisation, such as journals which reclassify transactions originally recorded as revenue
- > expenditure to capital or REFCUS.

Our work in this area required us to gain a more granular understanding of the Council's processes for capital, from the initiation of transactions through to reporting in the financial statements. Although we do not test these processes and associated controls in detail as part of our approach our consideration has not highlighted any issue we need to draw to your attention.

Capital expenditure in relation to Investment Properties was not material, therefore we focused our testing on property, plant and equipment capital additions and also Revenue Expenditure Financed from Capital Under Statute (REFCUS) capital additions.

We identified two errors within our testing. The Council inappropriately classified additions to assets under construction as assets completed. We extrapolated this error and the resultant projected error was £915,000. The Council also inappropriately capitalised VAT within certain additions causing an immaterial error in the value of the additions.

We have challenged management's assessment of the classification of expenditure as REFCUS. Our testing in this area is complete and we noted an adjustment of £3.655 m in respect of IT transformation which was reclassified as PPE additions.

We did not identified any material inappropriate capitalisation of revenue expenditure.

The key issues identified as part of our audit were as follows: (cont'd)

Significant Risk

Risk of error in the valuation of land and buildings

The fair value of Property, Plant and Equipment and Investment Properties represent significant balances in the Authority's accounts and are subject to valuation changes, impairment reviews and depreciation charges.

In calculating amounts recorded in the Authority's balance sheet, management are required to make material judgements and apply estimation techniques.

Conclusion

We updated our risk assessment in light of the impact of Covid-19 and the fact that the external valuer had highlighted a 'material uncertainty' in their valuation report. As a result of this and also issues with the valuations in the prior year we instructed our internal valuers to support us with our work in this area.

We asked our internal valuation specialists to review a sample of assets across the portfolio including Property, Plant and Equipment and Investment Property assets. This highlighted some issues with regards the valuations specifically in respect of investment property valuations but also in respect of the valuation methodology of car parks. Having obtained revised valuations as a result of these findings, no further issues were identified.

The Council asked the external valuers to re-work their valuation of investment properties to take full account of Purchaser's Costs. They also requested further revaluations due to our finding that a number of assets were identified to have been revalued using incorrect floor sizes. Both of these resulted in material amendments.

We considered the impact of assets not revalued in year and the fact that assets valuations occur effective as at 31 March 2020. We challenged officers on the valuation of assets not revalued in-year and our assessment did not highlight any material issues.

The key issues identified as part of our audit were as follows: (cont'd)

Other Key Findings

Risk of error in the valuation of the pension liability

The Code and IAS19 require the Authority to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Liberata. The Authority's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Authority's balance sheet. At 31 March 2020 this totalled £853 million.

The information disclosed is based on the IAS 19 report issued to the Authority by the actuary to the Pension Fund.

Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

Going Concern

ISA 570 was revised in September 2019. The revised standard increases the work we are required to perform when assessing whether an entity is a going concern and means UK auditors will follow significantly stronger requirements than those required by current international standards. Whilst the standard is effective for audits of financial statements for periods commencing on or after 15 December 2019, EY have revised current audit procedures, recognising the importance of the forthcoming revisions.

Financial plans for 2020/21 and medium term financial plans may need revision for Covid-19. We considered the unpredictability of the current environment gave rise to a risk that the financial statements may not appropriately disclose the key factors relating to going concern, underpinned by managements assessment with particular reference to Covid-19 and the Pension Fund's year end financial position and performance.

Conclusion

We are satisfied that the Authority has correctly reflected the IAS 19 entries provided by the actuaries in the draft financial statements. We are also satisfied that the actuaries are appropriately qualified. This year, as in the previous year, there has been a national issue which resulted in a change to the Authority's pension net liability. It relates to legal rulings regarding age discrimination arising from public sector pension scheme transitional arrangements, commonly described as the "McCloud ruling". In addition, there is also another national issue, referred to as the Goodwin case.

We also asked our internal EY Pension actuarial specialists to support our review of the potential impact of McCloud and Goodwin in 2019/20. The Council did take account of McCloud but not the Goodwin case in the financial statements. The estimated impact of the Goodwin case is a 0.1% increase in 19 liability with EY specialists suggesting a range of 0.1%-0.2%. The IAS 19 Funded liability is £853 m, which equates to the following potential increase of £0.853 million.

Our work focussed on:

- > Obtaining management's going concern assessment and reviewing for any evidence of bias and checked consistency with the accounts;
- Reviewing the financial modelling and forecasts prepared by management and considering and challenging key assumptions, focusing on the reasonableness of the liquidity forecasts up to a date of 12 months after the expected signing date of the accounts;
- Considering the appropriateness of the going concern disclosure within the financial statements. The updated Going Concern disclosure note is included at Section 1 of the financial statements; and
- > Considering the impact on our audit report by undertaking internal EY consultation.

We did not identify any issues with respect to going concern.

Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	We determined planning materiality to be £5.66m (2019: £9.71m), which is 1% (2019: 1.8%) of gross revenue expenditure reported in the accounts of £566 million.
	We consider gross revenue expenditure to be one of the principal considerations for stakeholders in assessing the financial performance of the Council.
Reporting threshold	We agreed with the Audit and Risk Committee that we would report to the Committee all audit differences in excess of £0.28m (2019: £0.48m) for the Council and £0.50m (2019: £0.52m) for the Pension Fund.

Section 4 **Value for Money**

Value for Money

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. This is known as our value for money conclusion.

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

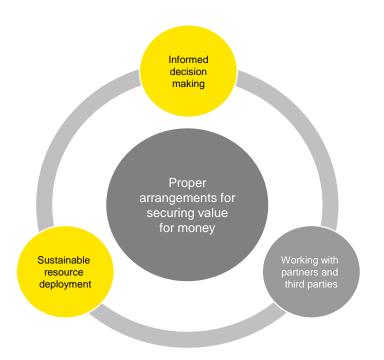
- ► Take informed decisions;
- ▶ Deploy resources in a sustainable manner; and
- ▶ Work with partners and other third parties.
- ▶ On 16 April 2020 the National Audit Office published an update to auditor guidance in relation to the 2019/20 Value for Money assessment in the light of covid-19.
- ▶ This clarified that in undertaking the 2019/20 Value for Money assessment auditors should consider Local Authorities' response to Covid-19 only as far as it relates to the 2019-20 financial year; only where clear evidence comes to the auditor's attention of a significant failure in arrangements as a result of Covid-19 during the financial year, would it be appropriate to recognise a significant risk in relation to the 2019-20 VFM arrangements conclusion.

Due to the delay in certification of the 2017/18 audit by the predecessor auditor as a result of outstanding objections on value for money, we have been unable to conclude our value for money review, and specifically the work on the objection to the 2018/19 financial statements which has a potential impact on our reporting for value for money.

We have been in regular discussions with senior officers and also the predecessor auditor to understand the latest position regarding the closure of these prior year accounts and the specific objections raised with regards procurement.

The predecessor auditor has now reached a conclusion and issued the certificate in respect of the 2017/18 audit. We held a meeting with the predecessor auditor to discuss that conclusion and to request that they share with us their assessment including any legal advice. We have received the requested information and are in the process of completing our review and reaching a conclusion on the 2018/19 objection.

We are unable to conclude whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2019 until we have concluded our work on the objection to the financial statements.





Other Reporting Issues

Whole of Government Accounts

We were unable to report to the NAO on our review of the Council's WGA due to the delay in the completion of the audit.

Annual Governance Statement

We are required to consider the completeness of disclosures in the Council's annual governance statement, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading.

We completed this work and did not identify any areas of concern.

Report in the Public Interest

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the Council or brought to the attention of the public.

We did not identify any issues which required us to issue a report in the public interest.

Written Recommendations

We have a duty under the Local Audit and Accountability Act 2014 to designate any audit recommendation as one that requires the Council to consider it at a public meeting and to decide what action to take in response.

We did not identify any issues which required us to issue a written recommendation.

Other Reporting Issues (cont'd)

Objections Received

We received an objection to the 2018/19 Statement of Accounts from a member of the public. We cannot formally conclude the audit and issue an audit certificate as we have not yet completed the work necessary to conclude the objection to the Council's 2018/19 Statement of Accounts. It is our view that even if the objection were resolved in the objector's favour, this would not materially affect the Statement of Accounts. We are unable to form a conclusion on whether we are satisfied that, in all significant respects, the London Borough of Bromley put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2020 until we complete the work necessary to conclude the objection.

The predecessor auditor reached a conclusion and issued the certificate in respect of the 2016.17 and 2017/18 audits in February 2022. We held a meeting with the predecessor auditor to discuss that conclusion and to request that they share with us their assessment including any legal advice. We have received the requested information and are in the process of completing our review and reaching a conclusion on the 2018/19 objection.

Other Powers and Duties

We identified no issues during our audit that required us to use our additional powers under the Local Audit and Accountability Act 2014.

Independence

We communicated our assessment of independence in our Audit Results Report to the Audit and Risk Committee on 8 March 2023. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.

Control Themes and Observations

As part of our work, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. Although our audit was not designed to express an opinion on the effectiveness of internal control, we are required to communicate to you significant deficiencies in internal control identified during our audit.

We have adopted a fully substantive audit approach and have therefore not tested the operation of controls.



Audit Fees

As part of our reporting on our independence, we set out below a summary of the fees proposed for the year ended 31 March 2020.

We confirm that we have not undertaken non-audit work outside the NAO Code requirements. Non-audit work is work not carried out under the Code.

Council	Final Fee 2019/20	Planned Fee 2019/20	Final Fee 2018/19
Description	£	£	£
Total Audit Fee - Code work	91,689	91,689	91,689
Additional fees	262,789*	TBC	107,432
Objection	TBC**		TBC**
Total Audit Fee	354,478	91,689	199,121

^{*} Additional fees are in respect of additional work required to the reduction in materiality from the prior year, impact of covid-19 on the audit, audit of the asset valuations and related prior period adjustments, audit of the pension fund valuation, audit of infrastructure assets, auditing issues in relation to the finance systems, IT Tools and additional procedures required relating to post balance sheet events and going concern consultations. We discussed our proposed additional fees with the Director of Finance before seeking formal approval from Public Sector Audit Appointments Ltd (PSAA) for the scale fee variation.

^{**} We will communicate the additional fee in respect of the objection and related value for money conclusion once the work has been completed.

Pension Fund	Final Fee 2019/20	Planned Fee 2019/20	Final Fee 2018/19
Description	£	£	£
Total Audit Fee - Code work	16,170	16,170	16,170
Additional fees*	51,334*	5,000	-
Total Audit Fee	67,504	21,170	16,170

^{*} Additional fees are in respect of additional work required to the extended period to be able to finalise the financial statements, the audit of the valuation of L2 and L3 assets, consideration of the triennial valuation as at 31 March 2022 on the IAS 26 disclosures for 2019/20, additional procedures required due to the joint bank account with the Council, work over our the risk of fraud in revenue recognition and additional procedures required relating to post balance sheet events and going concern consultations. We discussed our proposed additional fees with the Director of Finance before seeking formal approval from Public Sector Audit Appointments Ltd (PSAA) for the scale fee variation.

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