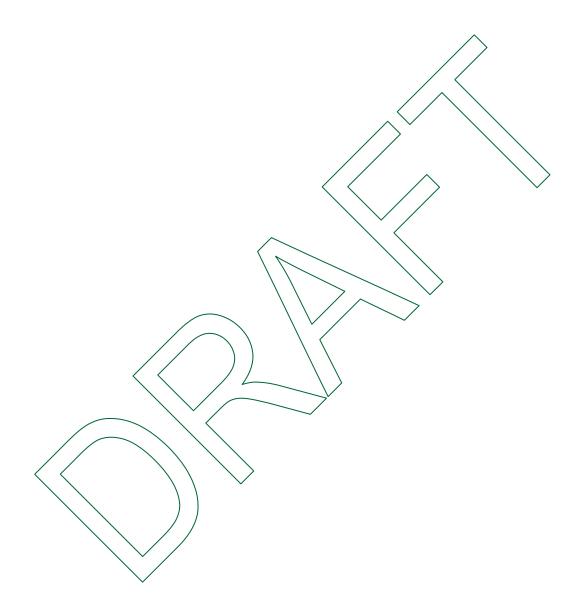
# Audit plan

# **Halton Borough Council**

Audit 2010/11





The Audit Commission is an independent watchdog, driving economy, efficiency and effectiveness in local public services to deliver better outcomes for everyone.

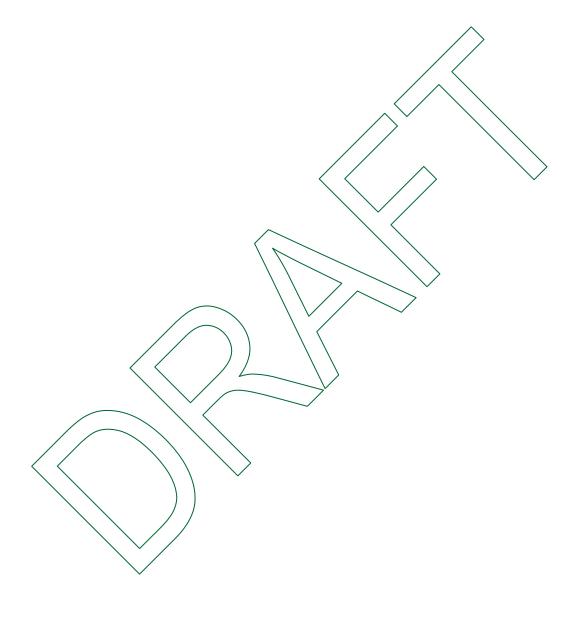
Our work across local government, health, housing, community safety and fire and rescue services means that we have a unique perspective. We promote value for money for taxpayers, auditing the £200 billion spent by 11,000 local public bodies.

As a force for improvement, we work in partnership to assess local public services and make practical recommendations for promoting a better quality of life for local people.

# Contents

Introduction	3
Responsibilities	4
Fee for the audit	5
Working together	5
Auditors report on the financial statements	7
2010/11 opinion audit changes	7
Materiality	8
Identifying opinion audit risks	8
Identification of specific risks	9
Value for money risks	10
Testing strategy	11
Value for money conclusion	
Key milestones and deadlines	14
The audit team	15
Independence and objectivity	15
Meetings	15
Quality of service	15
Planned outputs.\\	16
Appendix 1 Basis for fee	17
Assumptions	17
Appendix 2 Changes to the opinion audit as a result of the revised	
International Standards on Auditing (UK&I) (ISAs)	18
Journals	
Related party transactions	18
Accounting estimates	
Deficiencies in internal control	19
Appendix 3 Independence and objectivity	20

Appendix 4 Working together	22
Meetings	22
Sustainability	23
Appendix 5 Glossary	24



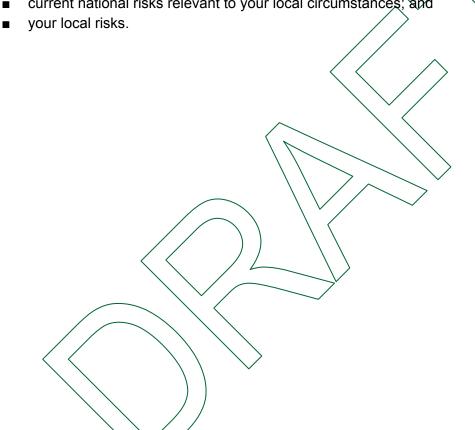
# Introduction

This plan sets out the audit work that I propose to undertake for the audit of financial statements and the value for money conclusion 2010/11.

The plan is based on the Audit Commission's risk-based approach to audit planning. It reflects:

audit work specified by the Audit Commission for 2010/11;

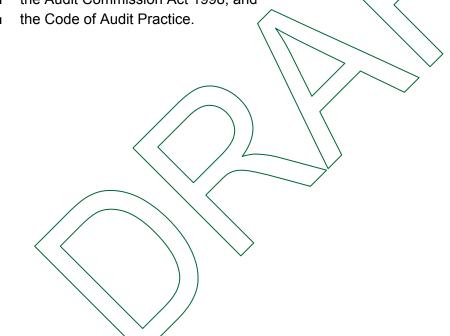
current national risks relevant to your local circumstances; and



# Responsibilities

The Audit Commission's Statement of Responsibilities of Auditors and of Audited Bodies sets out the respective responsibilities of the auditor and the audited body. The Audit Commission has issued a copy of the Statement to every audited body.

- 2 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end and I undertake my audit work to meet these responsibilities.
- 3 I comply with the statutory requirements governing our audit work, in particular:
- the Audit Commission Act 1998; and



#### Fee for the audit

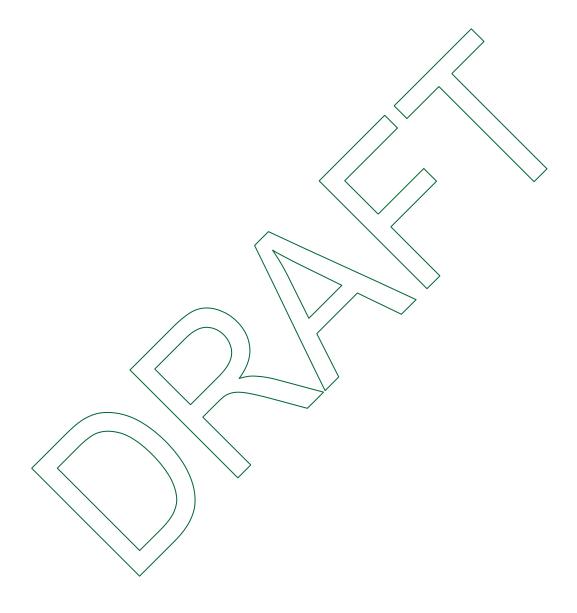
# The fee for the audit is £258,005, as indicated in my letter of 19 April 2010.

- 4 The Audit Commission scale fee for a Council of your size is £270,380. The fee proposed for 2010/11 is 4.5 per cent below the scale fee and is within the normal level of variation specified by the Commission.
- 5 However, the Commission wrote to all audited bodies, on 9 August, about its proposed new arrangements for local value for money audit work. This indicated the impact on audit fees for 2010/11 would be considered as part of the Commission's consultation on its work programme and scales of fees for 2011/12, originally planned for September. In light of the Secretary of State's announcement on the government's intention to abolish the Commission, this consultation has been delayed.
- 6 In setting the fee, I have assumed that:
- the loss of experienced contract support from January 2011 will not have a negative impact on the quality and timeliness of the 2010/11 financial statements;
- good quality, accurate working papers are available at the start of the financial statements audit.
- the Council will supply good quality working papers to support the restatement of 2009/10 balances to comply with international Financial Reporting Standards (IFRS)]; and
- Internal Audit undertakes appropriate work on all material systems and this is available for our review by 30 April 2011.
- 7 Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee. Where this is the case, I will discuss this first with the Operational Director Finance and I will issue supplements to the plan to record any revisions to the risk and the impact on the fee.
- 8 Further information on the basis for the fee is set out in Appendix 1.

#### Working together

- **9** As in previous years, I will work with your staff to ensure an efficient audit and to provide ongoing audit support. To this end I have provided officers with an updated protocol on joint working and discussions are already underway about working paper requirements to support the 2010/11 financial statements.
- **10** In addition at least two of the Council's finance officers will attend the Audit Commission's 2010/11 accounts workshop in February 2011. The aim

of this event is to help local government bodies achieve a smooth and trouble-free final accounts and audit process. It will highlight key accounting and audit issues and help individual delegates gain a practical understanding of the new and complex issues they may face through an interactive workshop.



### Auditors report on the financial statements

I will carry out the audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).

11 I am required to issue an audit report giving my opinion on whether the accounts give a true and fair view of the financial position of the Council as at 31 March 2011.

#### 2010/11 opinion audit changes

- 12 My audit of the financial statements is governed by the International Standards on Auditing (UK&I) (ISAs). These standards prescribe the basic principles and essential procedures, with the related guidance, which govern my professional conduct as your auditor.
- 13 As with all guidance and frameworks, auditing standards are revised and updated, often in a piecemeal fashion. However, in 2009 the auditing profession completed a comprehensive project to improve the clarity of all the ISAs. This is known as the Clarity Project.
- 14 One of the main objectives of the Clarity Project was to promote greater consistency of application between auditors. This has been done by reducing the ambiguity within existing ISAs and improving their overall readability and understandability.
- 15 The new clarified framework will apply to my audit of your 2010/11 financial statements. Because of the new standards, you can expect to see some changes in the way my audit team delivers your audit and the information they seek from you. The impact of the main changes is set out in Appendix 2.
- 16 In summary the main changes you will see cover:
- journals;
- related party transactions;
- accounting estimates; and
- reporting deficiencies in internal control.

#### **Materiality**

17 I will apply the concept of materiality in both planning and performing the audit, in evaluating the effect of any identified misstatements, and in forming my opinion.

# Identifying opinion audit risks

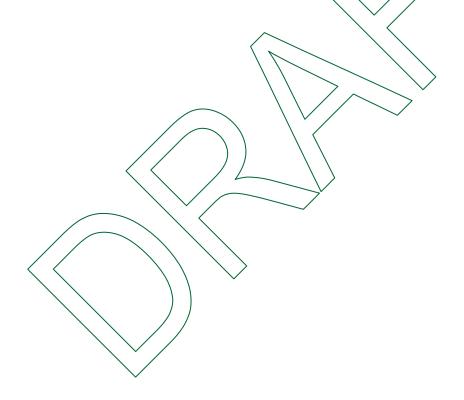
18 I need to understand fully the Council to identify any risk of material misstatement (whether due to fraud or error) in the financial statements. I do this by:

 identifying the business risks facing the Council, including assessing your own risk management arrangements;

considering the financial performance of the Council;

 assessing internal control - including reviewing the control environment, the IT control environment and Internal Audit; and

 assessing the risk of material misstatement arising from the activities and controls within the Council's information systems.



# Identification of specific risks

I have considered the additional risks that are appropriate to the current opinion audit and have set these out below.

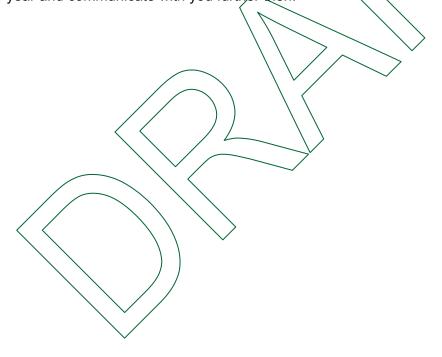
Table 1:	Specific risks
Specific o	ninion risks identified

Specific opinion risks identified			
Risk area	Why is this a risk?	Audit response	
Transition to IFRS accounts; component accounting for material items of property plant and equipment  Transition to IFRS.	<ul> <li>This is a new requirement</li> <li>The guidance is complex</li> <li>There is a degree of subjectivity permitted</li> <li>It requires a multidisciplinary approach</li> </ul>	<ul> <li>I will be reviewing the procedures and controls that exist within the property database</li> <li>I will substantively test a sample of property valuations for reasonableness</li> <li>I will review the instructions given to valuers</li> <li>I will review the basis on which individual assets have been identified as material</li> <li>I will be reviewing the procedures</li> </ul>	
accounts: segmental reporting of income and expenditure	ing of income and financial outturn data will be	<ul> <li>and controls that exist within the general ledger</li> <li>I will substantively test extraction of data from the general ledger</li> <li>I will test reconciliation of segmental information to the income statement</li> </ul>	
Accounting for costs associated with Mersey Gateway	<ul> <li>Fairly unique scheme</li> <li>High value transactions</li> <li>Complex accounting area</li> <li>Changes to accounting treatment required in previous years</li> </ul>	<ul> <li>I will liaise with officers and provide an early view on any proposed accounting treatments put to me</li> <li>I will substantively test a sample of Mersey Gateway transactions to check the accounting treatment</li> </ul>	
Accounting for equal pay	<ul><li>Specific accounting guidance to be followed</li><li>Affordability</li></ul>	<ul> <li>I will continue to discuss both the accounting treatment and affordability with officers during</li> </ul>	

19 The Council is putting in place plans and actions to mitigate the effects of public spending constraints. At this time I have not identified any specific risk to the Council's 2010/11 financial statements or the audit process. However I will continue to monitor developments and if new risks arise I will bring these to your attention in a supplementary plan.

#### Value for money risks

20 I will undertake my risk assessment for the vfm conclusion early in the new year and communicate with you further then.



### Testing strategy

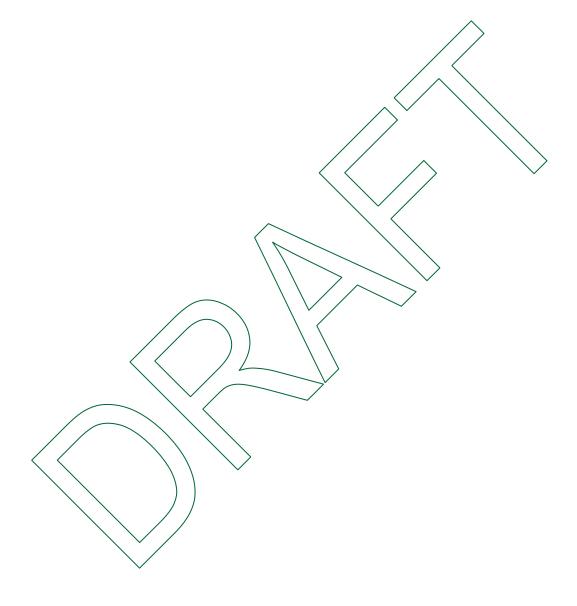
On the basis of risks identified above I will produce a testing strategy which will consist of testing key controls and/or substantive tests of transaction streams and material account balances at year end.

- 21 I can carry out the testing both before and after the draft financial statements have been produced (pre- and post-statement testing).
- 22 Wherever possible, I will complete some substantive testing earlier in the year before the financial statements are available for audit. I have identified the following areas where substantive testing could be carried out early.
- Review of accounting policies.
- Bank reconciliation.
- Contributions.
- Investments ownership.
- Year-end feeder system reconciliations
- Physical verification of property, plant and equipment.
- Review of related party transactions.

Where I identify other possible early testing, I will discuss it with officers.

- Wherever possible, and in line with our joint working protocol, I will seek to rely on the work of Internal Audit to help meet my responsibilities. For 2010/11, I expect to be able to use the results of the following pieces of work.
- General ledger key control audit.
- Payroll fundamental system review
- Housing and council tax behefits fundamental system review.
- Council tax billing and payments key control audit.
- Creditors fundamental system review.
- Sundry debtors fundamental system review.
- 24 I will also seek to rely on the work of other auditors and experts, as appropriate, to meet my responsibilities. For 2010/11, I plan to rely on the work of other auditors in the following areas:
- Verification of liabilities and disclosures of employee benefits as required by International Accounting Standard (IAS) 19 and notified by Merseyside Local Government Pension Fund.
- 25 I also plan to rely on the work of experts in the following areas:
- Valuation of liabilities under IAS 19 as notified by the Actuary of the Merseyside Local Government Pension Fund.

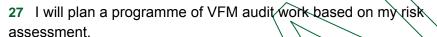
 Valuation of Property Plant and Equipment provided by the Council's in house valuers.



# Value for money conclusion

# I am required to give a statutory VFM conclusion on the Council's arrangements to secure economy, efficiency and effectiveness.

- **26** This is based on two criteria, specified by the Commission, related to your arrangements for:
- securing financial resilience focusing on whether the Council is managing its financial risks to secure a stable financial position for the foreseeable future; and
- challenging how the Council secures economy, efficiency and effectiveness – focusing on whether the Council is prioritising its resources within tighter budgets and improving productivity and efficiency.





# Key milestones and deadlines

The Council is required to prepare the financial statements by 30 June 2011. I am required to complete the audit and issue the opinion and value for money conclusion by 30 September 2011.

- 28 The key stages in producing and auditing the financial statements are in Table 2.
- 29 I will agree with you a schedule of working papers required to support the entries in the financial statements. The agreed fee is dependent on the timely receipt of accurate working papers.
- 30 Every week, during the audit, the audit team will meet with the key contact and review the status of all queries. I can arrange meetings at a different frequency depending on the need and the number of issues arising.

Table 2:	Proposed	timetable
----------	----------	-----------

Activity	Date
Control and early substantive testing	By April 2011
Receipt of accounts	Week commencing 27 June 2011
Sending audit working papers to the auditor	30 June 2011
Start of detailed testing	4 July 2011
Progress meetings	Weekly
Present report to those charged with governance at the audit committee	By 30 September 2011
Issue opinion and value for money conclusion	By 30 September 2011

#### The audit team

# Table 3 shows the key members of the audit team for the 2010/11 audit.

Table 3: Audit team			
Name	Contact details	Responsibilities	
Mike Thomas District Auditor	m-thomas@audit- commission.gov.uk 0844 798 3572	Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive.	
Colette Williams Audit Manager	c-williams@audit- commission.gov.uk 0844 798 3572	Manages and coordinates the different elements of the audit work. Key point of contact for the Operational Director Finance.	
Judith Smith Team Leader	j-smith@audit- commission.gov.uk 0844 798 3596	Leads the fieldwork on the opinion audit. Point of contact in the Audit Manager's absence.	

# Independence and objectivity

- 31 I am not aware of any relationships that may affect the independence and objectivity of the District Auditor and the audit staff, which I am required by auditing and ethical standards to communicate to you.
- 32 I comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised in Appendix 3.

#### **Meetings**

33 The audit team will ensure we have knowledge of your issues to inform our risk-based audit through regular liaison with key officers. Our proposals are set out in Appendix 4.

#### **Quality of service**

34 I aim to provide you with a quality audit service. If, however, you are unable to deal with any difficulty through me and my team please contact Chris Westwood, Director of Professional Practice, Audit Practice, Audit Commission, 1st Floor, Millbank Tower, Millbank, London SW1P 4HQ (c-

westwood@audit-commission.gov.uk) who will look into any complaint promptly and to do what he can to resolve the position.

35 If you are still not satisfied you may of course take up the matter with the Audit Commission's Complaints Investigation Officer (The Audit Commission, Westward House, Lime Kiln Close, Stoke Gifford, Bristol BS34 8SR).

#### **Planned outputs**

36 My team will discuss and agree reports with the right officers before issuing them to the Business Efficiency Board.

Table 4: Planned outputs	Table 4:	<b>Planned</b>	outputs
--------------------------	----------	----------------	---------

Table 4: Planned outputs	
Planned output	Indicative date
Annual governance report	19 September 2011
Auditor's report giving an opinion on the financial statements	By 30 September 2011
Annual audit letter	By 30 November 2011

# Appendix 1 Basis for fee

The Audit Commission is committed to targeting its work where it will have the greatest effect, based upon assessments of risk and performance. This means planning work to address areas of risk relevant to our audit responsibilities and reflecting this in the audit fees.

The risk assessment process starts with the identification of the significant financial and operational risks applying to the Council with reference to:

- my cumulative knowledge of the Council;
  - planning guidance issued by the Audit Commission;
  - the specific results of previous and ongoing audit work;
- interviews with Council officers; and
- liaison with Internal Audit.

#### **Assumptions**

In setting the fee, I have assumed that:

- the loss of experienced contract support from January 2011 will not have a negative impact on the quality and timeliness of the 2010/11 financial statements;
- the fee for the value for money conclusion is the same as for 2009/10
- you will inform me of significant developments impacting on the audit;
- Internal Audit meets the appropriate professional standards;
- Internal Audit undertakes appropriate work on all systems that provide material figures in the financial statements sufficient that I can place reliance for the purposes of our audit.
- you provide:
  - good quality working papers and records to support the financial statements by 30 June 2011;
  - information asked for within agreed timescales;
  - prompt responses to draft reports; and
- there is no allowance for extra work needed to address questions or objections raised by local government electors.

Where these assumptions are not met, I will be required to undertake additional work which is likely to result in an increased audit fee.

# Appendix 2 Changes to the opinion audit as a result of the revised International Standards on Auditing (UK&I) (ISAs)

The revised ISAs are applicable from the 2010/11 audit onwards. I outline below the main changes you will notice in the way my audit team delivers your audit because of the revised ISAs.

#### **Journals**

ISA (UK&I) 330 (The Auditor's response to assessed risks), requires me to review all material year-end adjustment journals. I can do this by using interrogation tools such as CAATs (Computer aided audit techniques), IDea software or excel, depending on the compatibility of your general ledger software. My Audit Manager will discuss a suitable approach to this work in meetings with officers over the next few weeks.

#### **Related party transactions**

ISA (UK&I) 550 (Related parties) requires me to review your procedures for identifying related party transactions and obtain an understanding of the controls that you have established to identify such transactions. I will also review minutes and correspondence for evidence of related party transactions and carry out testing to ensure the related party transaction disclosures you make in the financial statements are complete and accurate.

#### Accounting estimates

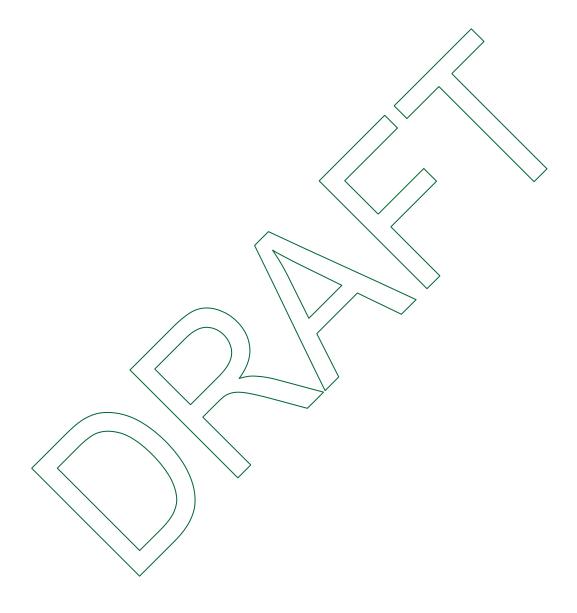
ISA (UK&I) 540 (Auditing Accounting Estimates, Including Fair Value Accounting Estimates, And Related Disclosures) requires me to look at your accounting estimates in detail. As part of my audit I will request a list of these from you. Will need to know in particular:

- the process you use to make your accounting estimates:
- the controls you use to identify them;
- whether you use an expert to help you in making the accounting estimates;
- whether any alternative estimates have been discussed and why they have been rejected;
- how you assess the degree of estimation uncertainty (this is the uncertainty arising because the estimate cannot be precise or exact);
   and
- the prior year's accounting estimates outcomes, and whether there has been a change in the method of calculation for the current year.

#### **Deficiencies in internal control**

ISA (UK&I) 265 (Communicating Deficiencies In Internal Control To Those Charged With Governance And Management) is a new standard.

If I identify a deficiency in any of your internal controls during the audit, I will undertake more audit testing to decide whether the deficiency is significant. If I decide the deficiency is significant, I will report it in writing to the Business Efficiency Board as those charged with governance.



# Appendix 3 Independence and objectivity

Auditors appointed by the Audit Commission are required to comply with the Commission's Code of Audit Practice and Standing Guidance for Auditors, which defines the terms of the appointment. When auditing the financial statements, auditors are also required to comply with auditing standards and ethical standards issued by the Auditing Practices Board (APB).

The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.

International Standard on Auditing (UK and Ireland) 260 (Communication of audit matters with those charged with governance) requires that the appointed auditor:

- discloses in writing all relationships that may bear on the auditor's objectivity and independence, the related safeguards put in place to protect against these threats and the total amount of fee that the auditor has charged the client; and
- confirms in writing that the APB's ethical standards are complied with and that, in the auditor's professional judgement, they are independent and their objectivity is not compromised.

The standard defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case, the appropriate addressee of communications from the auditor to those charged with governance is the Business Efficiency Board. The auditor reserves the right, however, to communicate directly with the Council on matters which are considered to be of sufficient importance.

The Commission's Code of Audit Practice has an overriding general requirement that appointed auditors carry out their work independently and objectively, and ensure that they do not act in any way that might give rise to, or could reasonably be perceived to give rise to, a conflict of interest. In particular, appointed auditors and their staff should avoid entering into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement.

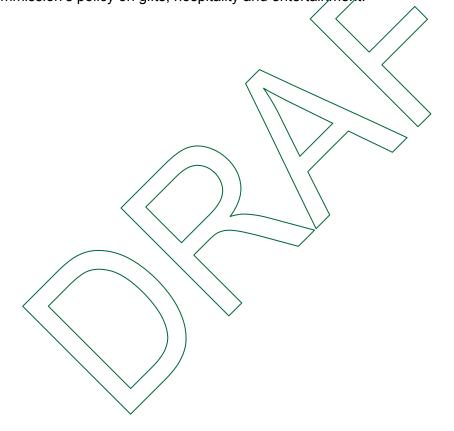
The Standing Guidance for Auditors includes a number of specific rules. The key rules relevant to this audit appointment are as follows.

Appointed auditors should not perform additional work for an audited body (ie work over and above the minimum required to meet their statutory responsibilities) if it would compromise their independence or might give rise to a reasonable perception that their independence could be compromised. Where the audited body invites the auditor to carry out risk-based work in a particular area that cannot otherwise be

justified as necessary to support the auditor's opinion and conclusions, it should be clearly differentiated within the Audit and Inspection Plan as being 'additional work' and charged for separately from the normal audit fee.

- Auditors should not accept engagements that involve commenting on the performance of other auditors appointed by the Commission on Commission work without first consulting the Commission.
- The District Auditor responsible for the audit should, in all but the most exceptional circumstances, be changed at least once every seven years, with additional safeguards in the last 2 years.
- The District Auditor and senior members of the audit team are prevented from taking part in political activity on behalf of a political party, or special interest group, whose activities relate directly to the functions of local government or NHS bodies in general, or to a particular local government or NHS body.

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



# Appendix 4 Working together

### **Meetings**

The audit team will ensure we have knowledge of your issues to inform our risk-based audit through regular liaison with key officers.

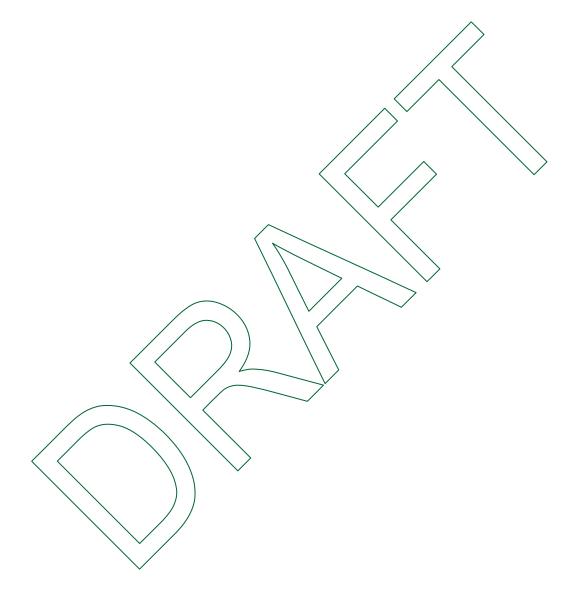
My proposal for the meetings is as follows.

Table 5: <b>Propos</b>	Table 5: Proposed meetings with officers			
Meeting	Attendees	Timing	Purpose	
Progress meeting	Chief Executive and other members of the Management Team District Auditor Audit Manager	Quarterly	General update on audit progress and Council issues.	
Audit Committees	District Auditor Audit Manager Members of the Business	As determined by the Committee	Formal reporting of: Audit Plan Annual governance report	
	Efficiency Board		Other issues as appropriate	
Progress meeting	District Auditor Audit Manager Strategic Director Resources and Operational Director Finance	Quarterly and as needed during the year	To discuss audit, finance, accounting and any other emerging issues	
Progress meeting	Audit Manager and/or Team Leader Divisional Manager - Audit and Operational Finance	Quarterly	To liaise on issues included in the joint working protocol	
Progress meetings	Audit Manager Chief Accountant	Bi-monthly	To discuss audit progress and specific accounting issues.	
Post statements progress meetings	Audit Manager Team Leader Chief Accountant Accountants	Weekly	To report on progress of the financial statements audit, resolve queries and agree reporting implications	

# Sustainability

The Audit Commission is committed to promoting sustainability in our working practices and I will actively consider opportunities to reduce our impact on the environment. This will include:

- reducing paper flow by encouraging you to submit documentation and working papers electronically;
- use of video and telephone conferencing for meetings as appropriate;
   and
- reducing travel.



# Appendix 5 Glossary

#### **Annual audit letter**

Report issued by the auditor to an audited body that summarises the audit work carried out in the period, auditors' opinions or conclusions (where appropriate) and significant issues arising from auditors' work.

#### Audit of the accounts

The audit of the accounts of an audited body comprises all work carried out by auditors in accordance with the Code to meet their statutory responsibilities under the Audit Commission Act 1998.

#### **Audited body**

A body to which the Audit Commission is responsible for appointing the external auditor, comprising both the members of the body and its management (the senior officers of the body). Those charged with governance are the members of the audited body. (See also 'Members' and 'Those charged with governance'.)

#### Auditing Practices Board (APB)

The body responsible in the UK for issuing auditing standards, ethical standards and other guidance to auditors. Its objectives are to establish high standards of auditing that meet the developing needs of users of financial information and to ensure public confidence in the auditing process.

#### Auditing standards

Pronouncements of the APB, which contain basic principles and essential procedures with which auditors are required to comply, except where otherwise stated in the auditing standard concerned.

#### Auditor(s)

Auditors appointed by the Audit Commission.

#### Code (the)

The Code of Audit Practice.

#### Commission (the)

The Audit Commission for Local Authorities and the National Health Service in England.

#### **Ethical Standards**

Pronouncements of the APB that contain basic principles that apply to the conduct of audits and with which auditors are required to comply, except where otherwise stated in the standard concerned.

#### **Financial statements**

The annual statement of accounts or accounting statements that audited bodies are required to prepare, which summarise the accounts of the audited body, in accordance with regulations and proper practices in relation to accounts.

#### Internal control

The whole system of controls, financial and otherwise, that is established in order to provide reasonable assurance of effective and efficient operations, internal financial control and compliance with laws and regulations.

#### Materiality (and significance)

The APB defines this concept as 'an expression of the relative significance or importance of a particular matter in the context of the financial statements as a whole. A matter is material if its omission would reasonably influence the decisions of an addressee of the auditor's report; likewise a misstatement is material if it would have a similar influence. Materiality may also be considered in the context of any individual primary statement within the financial statements or of individual items included in them. Materiality is not capable of general mathematical definition, as it has both qualitative and quantitative aspects'.

The term 'materiality' applies only in relation to the financial statements. Auditors appointed by the Commission have responsibilities and duties under statute, in addition to their responsibility to give an opinion on the financial statements, which do not necessarily affect their opinion on the financial statements.

The concept of significance applies to these wider responsibilities and auditors adopt a level of significance that may differ from the materiality level applied to their audit in relation to the financial statements. Significance has both qualitative and quantitative aspects.

#### **Members**

The elected, or appointed, members of local government bodies who are responsible for the overall direction and control of the audited body. (See also 'Those charged with governance' and 'Audited body'.)

#### Statement on internal control/Annual Governance Statement

Local government bodies are required to publish a statement on internal control (SIC) with their financial statements (or with their accounting statements in the case of small bodies). The disclosures in the SIC are

supported and evidenced by the body's assurance framework. At local authorities the SIC is known as the Annual Governance Statement and is prepared in accordance with guidance issued by CIPFA. Police authorities also produce a SIC in accordance with relevant CIPFA guidance. Local probation trusts are required to prepare a SIC in accordance with the requirements specified by HM Treasury in Managing Public Money.

#### Those charged with governance

Those charged with governance are defined in auditing standards as 'those persons entrusted with the supervision, control and direction of an entity'.

In local government bodies, those charged with governance, for the purpose of complying with auditing standards, are:

- for local authorities the full council, audit committee (where established) or any other committee with delegated responsibility for approval of the financial statements;
- for police or fire authorities the full authority, audit committee (where established) or other committee with delegated responsibility for approval of the financial statements;
- for local probation boards and trusts the board or audit committee;
   and
- for other local government bodies the full authority or board or council, audit committee (where established) or any other committee with delegated responsibility for approval of the financial statements

Audit committees are not mandatory for local government bodies, other than police authorities and local probation trusts. Other bodies are expected to put in place proper arrangements to allow those charged with governance to discuss audit matters with both internal and external auditors. Auditors should satisfy themselves that these matters, and auditors' reports, are considered at the level within the audited body that they consider to be most appropriate.

#### Whole of Government Accounts

The Whole of Government Accounts initiative is to produce a set of consolidated financial accounts for the entire UK public sector on commercial accounting principles. Local government bodies, other than probation boards and trusts, are required to submit a consolidation pack to the department for Communities and Local Government which is based on, but separate from, their statutory accounts.