The Police & Crime Commissioner for Leicestershire and the Chief Constable for Leicestershire

Year ending 31 March 2017

Audit Plan

March 2017

Ernst & Young LLP







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22 February 2017

Members of Joint Risk, and Assurance Panel The Police & Crime Commissioner for Leicestershire & The Chief Constable for Leicestershire Leicestershire Police FHQ St Johns Enderby Leicester LE19 2BX

Dear Committee Members,

Audit Plan

We are pleased to attach our Audit Plan for the Police and Crime Commissioner for Leicestershire (the PCC) and the Chief Constable of Leicestershire Constabulary (the CC).

The Plan sets out how we intend to carry out our responsibilities as auditor. The purpose of this report is to provide the Joint Audit, Risk and Assurance Panel with a basis to review our proposed audit approach and scope for the 2016/17 audit, in accordance with the requirements of Local Audit and Accountability Act 2014, the National Audit Office's 2015 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements. The purpose is also to ensure that our audit is aligned with the Joint Audit, Risk and Assurance Panel's service expectations.

This Plan summarises our initial assessment of the key risks driving the development of an effective audit for the PCC and CC, and outlines our planned audit strategy in response to those risks.

We welcome the opportunity to discuss this Audit Plan with you at 17 March 2016 Joint Audit, Risk and Assurance Panel and to understand whether there are other matters which you consider may influence our audit.

Yours faithfully

Stephen Clark Partner For and behalf of Ernst & Young LLP Enc

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In April 2015 Public Sector Audit Appointments Ltd (PSAA) issued "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)

The 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 from 1 April 2015' 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 Plan is prepared in the context of the Statement of responsibilities. It is addressed to the Joint Audit, Risk and Assurance Panel, and is prepared for the sole use of the audited body. 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 Steve Varley, 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.

1. Overview

Background

The Police Reform and Social Responsibility Act created two corporations sole:

- ► The Police & Crime Commissioner for Leicestershire (the PCC); and
- ► The Chief Constable of Leicestershire Constabulary (the CC).

We recognise the manner in which these two bodies are inter-linked and operate based on the governance documents and scheme of governance and consent that have been adopted.

Therefore, whilst each is a separate audit engagement, we have drafted one Joint Audit Plan to set out our approach to the two engagements, recognising that the audit risks inherent in both engagements and the programme of work required have much in common.

Where relevant, we will set out separately, any risks which are solely pertinent to one of the bodies.

The PCC is responsible for preparing and publishing Group financial statements. The Group comprises the accounts of both the single entity PCC and the single entity CC. The CC is responsible for preparing publishing the CC single entity financial statements.

Context for the audit

This Audit Plan covers the work that we plan to perform to provide you with:

- Our audit opinion on whether the financial statements of the Group, PCC and CC give a true and fair view of the financial position as at 31 March 2017 and of the income and expenditure for the year then ended; and
- Our conclusion on the PCC's and CC's arrangements to secure economy, efficiency and effectiveness.

We will also review and report to the National Audit Office (NAO), to the extent and in the form required by them, on the Group's Whole of Government Accounts return.

Our audit will also include the mandatory procedures that we are required to perform in accordance with applicable laws and auditing standards.

When planning the audit we take into account several key inputs:

- Strategic, operational and financial risks relevant to the financial statements;
- Developments in financial reporting and auditing standards;
- The quality of systems and processes;
- ► Changes in the business and regulatory environment; and,
- Management's views on all of the above.

By considering these inputs, our audit is focused on the areas that matter and our feedback is more likely to be relevant to the PCC and CC.

We will provide an update to the Joint Audit, Risk and Assurance Panel (JARAP) on the results of our work in these areas in our report to those charge with governance scheduled for delivery in September 2017.

Financial statement risks 2.

We outline below our current assessment of the financial statement risks facing the Group, PCC and CC, identified through our knowledge of the Group's, PCC's and CC's operations and discussion with those charged with governance and officers.

At our meeting, we will seek to validate these with you.

Significant risks (including fraud risks)	Our audit approach			
Risk of fraud in revenue recognition				
Under ISA240 there is a presumed risk that revenue may be misstated due to improper recognition of revenue. We have rebutted this risk for all revenue streams expect for income from fees and charges. 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. We have rebutted this risk for personnel costs and believe that the risk presents itself only in operational expenditure costs.	 We will Review and test revenue and expenditure recognition policies; Review and discuss with management any accounting estimates on revenue or expenditure recognition for evidence of bias; Develop a testing strategy to test material revenue and expenditure streams; Review and test revenue cut-off at the period end date; and 			
Risk of management override				
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.	 Our approach will focus on: Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financi statements Reviewing accounting estimates for evidence of management bias, and Evaluating the business rationale for significant unusual transactions 			
Other financial statement risks				
Joint Arrangements				
The PCC/Group participates in collaborative arrangements with Nottinghamshire, Derbyshire, Lincolnshire and Northamptonshire.	 Our approach will focus on: Review the underlying allocation of expenditure in the Authority's own accounts against agreements in place Seek further assurance from eternal auditors at the other Police Authorities where required over any significant stream of expenditure not controlled by Leicestershire. 			
Financial statements presentation – Expenditure and expenditure statement				
Amendments have been made to the Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 (the code) this year changing the way the financial statements are presented.	 Our approach will focus on: Review of the expenditure and funding analysis, CIES and new notes to ensure disclosures are in line with the code 			

The new reporting requirements impact the Comprehensive Income and Expenditure Statement (CIES) and the Movement in Reserves Statement (MiRS), and include the introduction of the new Expenditure and Funding Analysis' note as a result of the 'Telling the Story' review of the presentation of local authority financial statements.

The Code no longer requires statements or notes to be

- line with the code
- Review of the analysis of how these figures are ► derived, how the ledger system has been re-mapped to reflect the Group's, the PCC's and the CC's organisational structure and how overheads are apportioned across the service areas reported.
- Agreement of restated comparative figures back to ► the Group's, the PCC's and the CC's segmental

analysis and supporting working papers

prepared in accordance with SeRCOP. Instead the Code requires that the service analysis is based on the organisational structure under which the authority operates. We expect this to show the Group's, the PCC's and the CC's segmental analysis.

This change in the code will require a new structure for the primary statements, new notes and a full retrospective restatement of impacted primary statements. The restatement of the 2015/16 comparatives will require audit review, which could potentially incur additional costs, depending on the complexity and manner in which the changes are made.

2.1 Responsibilities in respect of fraud and error

We would like to take this opportunity to remind you that management has the primary responsibility to prevent and detect fraud. It is important that management, with the oversight of those charged with governance, has a culture of ethical behaviour and a strong control environment that both deters and prevents fraud.

Our responsibility is to plan and perform audits to obtain reasonable assurance about whether the financial statements as a whole are free of material misstatements whether caused by error or fraud. As auditors, we approach each engagement with a questioning mind that accepts the possibility that a material misstatement due to fraud could occur, and design the appropriate procedures to consider such risk.

Based on the requirements of auditing standards our approach will focus on:

- Identifying fraud risks during the planning stages;
- Enquiry of management about risks of fraud and the controls to address those risks;
- Understanding the oversight given by those charged with governance of management's processes over fraud;
- Consideration of the effectiveness of management's controls designed to address the risk of fraud;
- ► Determining an appropriate strategy to address any identified risks of fraud, and,
- ► Performing mandatory procedures regardless of specifically identified risks.

3. Value for money risks

We are required to consider whether the PCC and CC have put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. For 2016-17 this is based on the overall evaluation criterion:

"In all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people"

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.

In considering your proper arrangements, we will draw on the requirements of the CIPFA/SOLACE framework for local government to ensure that our assessment is made against a framework that you are already required to have in place and to report on through documents such as your annual governance statement.

We are only required to determine whether there are any risks that we consider significant, which the Code of Audit Practice which defines as:

"A matter is significant if, in the auditor's professional view, it is reasonable to conclude that the matter would be of interest to the audited body or the wider public"

Our risk assessment supports the planning of sufficient work to enable us to deliver a safe conclusion on arrangements to secure value for money and enables us to determine the nature and extent of further work that may be required. If we do not identify any significant risks there is no requirement to carry out further work.

Our risk assessment therefore considers both the potential financial impact of the issues we have identified, and also the likelihood that the issue will be of interest to local taxpayers, the Government and other stakeholders. We have reviewed the financial plans to date and have identified that there is a cumulative savings requirement of £5 million required over the next three years to achieve a balanced budget, without the use of reserves. The police force has reserves to cover these shortfalls; however, they have invested in a change team to identify savings so to reduce the reliance on reserves. The police force is confident in making these required savings.

At this point we have not identified any risks which we view as relevant to our value for money conclusion. However, we are completing a risk assessment against each of the three themes. In doing so, we particularly consider:

- · Our cumulative knowledge and experience of PCCs/CCs VFM arrangements;
- Ongoing liaison with PCC and CC Joint Chief Finance Officer, Internal Audit and HMIC;
- · The PCC and CC assurance framework and risk registers;
- Internal Audit's work and findings;
- The medium term financial plan and savings programmes post the comprehensive spending review settlement; and
- The outcome of HMIC PEEL assessments when published.

We will provide an update to the JARAP after we have completed our risk assessment.

4. Our audit process and strategy

4.1 Objective and scope of our audit

Under the Code of Audit Practice our principal objectives are to review and report on the Group's, PCC's and CC's:

- ► Financial statements
- Arrangements for securing economy, efficiency and effectiveness in its use of resources to the extent required by the relevant legislation and the requirements of the Code.

We issue an audit report that covers:

1. Financial statement audit

Our objective is to form an opinion on the Group, PCC and CC financial statements under International Standards on Auditing (UK and Ireland).

We report to you by exception in respect of your governance statement and other accompanying material as required, in accordance with relevant guidance prepared by the NAO on behalf of the Comptroller and Auditor General.

Alongside our audit report, we also:

- Review and report to the NAO on the Whole of Government Accounts return to the extent and in the form they require; and
- Give a separate opinion on the part of the Council's financial statements that relates to the accounts of the pension fund;

2. Arrangements for securing economy, efficiency and effectiveness (value for money)

We are required to consider whether the PCC and CC have put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources.

4.2 Audit process overview

The same audit team will be responsible for auditing the Group financial statements and the PCC and CC components. Appendix C provides an overview of the nature of our planned scope in respect of the Group, PCC and CC financial statements.

Our audit involves:

- Walking through the key internal controls in place and testing the operation of these controls;
- Reviewing internal audit plans and the results of work undertaken;

- Considering the work of other regulators (for example Her Majesty's Inspectorate of Constabulary) where appropriate; and
- ▶ Reliance on the work of experts in relation to areas such as pensions and valuations.

Processes

A key consideration in our audit planning process is the effectiveness of entity level controls; including the extent to which the PCC and the CC assesses risk, implements controls in order to minimise risk and performs ongoing testing and monitoring of the effectiveness of the controls implemented.

Analytics

We will use our computer-based analytics tools to enable us to capture whole populations of your financial data, in particular journal entries. These tools:

- Help identify specific exceptions and anomalies which can then be subject to more traditional substantive audit tests; and
- ► Give greater likelihood of identifying errors than random sampling techniques.

Internal audit

As in prior years, we will review internal audit plans and the results of their work. We will reflect the findings from these reports, together with reports from any other work completed in the year, in our detailed audit plan, where we raise issues that could have an impact on the year-end financial statements

Use of specialists

When auditing key judgements, we are often required to rely on the input and advice provided by specialists who have qualifications and expertise not possessed by the core audit team. The areas where either EY or third party specialists provide input for the current year audit are:

Area	Specialists
Pensions	EY pensions team and PWC; PCC and CC actuary
Property, Plant and Equipment	EY estates team; PCC valuer:

In accordance with Auditing Standards, we will evaluate each specialist's professional competence and objectivity, considering their qualifications, experience and available resources, together with the independence of the individuals performing the work.

We also consider the work performed by the specialist in light of our knowledge of the PCC's and CC's environment and processes and our assessment of audit risk in the particular area. For example, we would typically perform the following procedures:

- Analyse source data and make inquiries as to the procedures used by the expert to establish whether the source date is relevant and reliable;
- Assess the reasonableness of the assumptions and methods used;
- Consider the appropriateness of the timing of when the specialist carried out the work; and
- Assess whether the substance of the specialist's findings are properly reflected in the financial statements.

4.3 Mandatory audit procedures required by auditing standards and the Code

As well as the financial statement risks (section two) and value for money risks (section three), we must perform other procedures as required by auditing, ethical and independence standards, the Code and other regulations. We outline below the procedures we will undertake during the course of our audit.

Procedures required by standards

- Addressing the risk of fraud and error;
- Significant disclosures included in the financial statements;
- Entity-wide controls;
- Reading other information contained in the financial statements and reporting whether it is inconsistent with our understanding and the financial statements; and
- Auditor independence.

Procedures required by the Code

- Reviewing, and reporting on as appropriate, other information published with the financial statements, including the Annual Governance Statement; and
- Reviewing and reporting on the Whole of Government Accounts return, in line with the instructions issued by the NAO.

Finally, we are also required to discharge our statutory duties and responsibilities as established by the Local Audit and Accountability Act 2014.

4.4 Materiality

For the purposes of determining whether the financial statements are free from material error, we define materiality as the magnitude of an omission or misstatement that, individually or in aggregate, could reasonably be expected to influence the users of the financial statements. Our evaluation requires professional judgement and so takes into account qualitative as well as quantitative considerations implied in the definition.

We have determined that overall materiality for the financial statements for the Group is £3.4 million and CC is £3.4 million based on 2% Gross Revenue Expenditure using financial forecasts for the period ending 31 March 2017.

Overall materiality for the PCC is £1.9 million based on 2% of Gross Assets. Overall materiality for the Police Pension Fund is £1 million based on 2% of Benefits Payable.

We will communicate uncorrected audit misstatements to you greater than of £170,000 (Group and CC), £100,000 (PCC single entity) and £50,000 (Police Pension Fund).

The amount we consider material at the end of the audit may differ from our initial determination. At this stage, however, it is not feasible to anticipate all the circumstances that might ultimately influence our judgement. At the end of the audit we will form our final opinion by reference to all matters that could be significant to users of the financial statements, including the total effect of any audit misstatements, and our evaluation of materiality at that date.

4.5 Fees

The duty to prescribe fees is a statutory function delegated to Public Sector Audit Appointments Ltd (PSAA) by the Secretary of State for Communities and Local Government. PSAA has published a scale fee for all relevant bodies. This is defined as the fee required by auditors to meet statutory responsibilities under the Local Audit and Accountability Act 2014 in accordance with the NAO Code. The indicative fee scale for the audit of the PCC is £32,430 and for the audit of the CC is £15,000.

4.6 Your audit team

The engagement team is led by Steve Clark, Partner, who has significant experience in the police sector. Steve is supported by Avtar Sohal, Manager, who is responsible for the day-today direction of audit work and is the key point of contact for the PCC and the CC lead on the production of their accounts.

4.7 Timetable of communication, deliverables and insights

We have set out below a timetable showing the key stages of the audit, including the value for money work and the Whole of Government Accounts. The timetable includes the deliverables we have agreed to provide to the PCC and CC through the JARAP's cycle in 2016/17. These dates are determined to ensure our alignment with PSAA's rolling calendar of deadlines.

From time to time matters may arise that require immediate communication with the PCC, CC and the JARAP and we will discuss them with the Chair as appropriate.

Following the conclusion of our audit we will prepare an Annual Audit Letter to communicate the key issues arising from our work to the PCC and CC and external stakeholders, including members of the public.

Audit phase	Timetable	Joint Audit, Risk and Assurance Panel timetable	Deliverables
High level planning	April 2016	April 2016	Audit Fee Letter
Risk assessment and setting of scopes	December – March 2017	March 2017	Audit Plan
Testing routine processes and controls	February - April 2017	June 2017	Interim results report (if appropriate)
Completion of audit	June – July 2017	September 2017	Report to those charged with governance via the Audit Results Report
	20.9 20 11		Audit report (including our opinion on the financial statements and, overall value for money conclusion).
			Audit completion certificate
			Reporting to the NAO on the Whole of Government Accounts return.
Conclusion of reporting	October 2017	November 2017	Annual Audit Letter

In addition to the above formal reporting and deliverables we will seek to provide practical business insights and updates on regulatory matters.

5. Independence

5.1 Introduction

The APB Ethical Standards and ISA (UK and Ireland) 260 'Communication of audit matters with those charged with governance', requires us to communicate with you on a timely basis on all significant facts and matters that bear on our independence and objectivity. The Ethical Standards, as revised in December 2010, require that we do this formally both at the planning stage and at the conclusion of the audit, as well as during the audit if appropriate. The aim of these communications is to ensure full and fair disclosure by us to those charged with your governance on matters in which you have an interest.

Required communications

Planning stage	Final stage			
 The principal threats, if any, to objectivity and independence identified by EY including consideration of all relationships between you, your affiliates and directors and us; The safeguards adopted and the reasons why they are considered to be effective, including any Engagement Quality Review; The overall assessment of threats and safeguards; Information about the general policies and process within EY to maintain objectivity and independence. 	 A written disclosure of relationships (including the provision of non-audit services) that bear on our objectivity and independence, the threats to our independence that these create, any safeguards that we have put in place and why they address such threats, together with any other information necessary to enable our objectivity and independence to be assessed; Details of non-audit services provided and the fees charged in relation thereto; Written confirmation that we are independent; 			
	 Details of any inconsistencies between APB Ethical Standards, the PSAA Terms of Appointment and your policy for the supply of non-audit services by EY and any apparent breach of that policy; and 			
	 An opportunity to discuss auditor independence issues. 			

During the course of the audit we must also communicate with you whenever any significant judgements are made about threats to objectivity and independence and the appropriateness of our safeguards, for example when accepting an engagement to provide non-audit services.

We also provide information on any contingent fee arrangements, the amounts of any future contracted services, and details of any written proposal to provide non-audit services;

We ensure that the total amount of fees that EY and our network firms have charged to you and your affiliates for the provision of services during the reporting period are disclosed and analysed in appropriate categories.

5.2 Relationships, services and related threats and safeguards

We highlight the following significant facts and matters that may be reasonably considered to bear upon our objectivity and independence, including any principal threats. However we have adopted the safeguards below to mitigate these threats along with the reasons why they are considered to be effective.

Self-interest threats

A self-interest threat arises when EY has financial or other interests in your entity. Examples include where we have an investment in your entity; where we receive significant fees in respect of non-audit services; where we need to recover long outstanding fees; or where we enter into a business relationship with the PCC and CC.

At the time of writing, there are no long outstanding fees.

We believe that it is appropriate for us to undertake permissible non-audit services, and we will comply with the policies that the PCC and CC have approved and that are in compliance with the PSAA Terms of Appointment.

At the time of writing, the PCC and CC have not commissioned any non-audit services from EY for 2016/17.No additional safeguards are required.

A self-interest threat may also arise if members of our audit engagement team have objectives or are rewarded in relation to sales of non-audit services to the PCC and CC. We confirm that no member of our audit engagement team, including those from other service lines, is in this position, in compliance with Ethical Standard 4.

There are no other self-interest threats at the date of this report.

Self-review threats

Self-review threats arise when the results of a non-audit service performed by EY or others within the EY network are reflected in the amounts included or disclosed in the financial statements.

There are no other self-review threats at the date of this report.

Management threats

Partners and employees of EY are prohibited from taking decisions on behalf of management of your entity. Management threats may also arise during the provision of a non-audit service where management is required to make judgements or decisions based on that work.

There are no management threats at the date of this report.

Other threats

Other threats, such as advocacy, familiarity or intimidation, may arise.

There are no other threats at the date of this report

Overall Assessment

Overall we consider that the adopted safeguards appropriately mitigate the principal threats identified, and we therefore confirm that EY is independent and the objectivity and independence of Steve Clark, Partner and the audit engagement team have not been compromised.

5.3 Other required communications

EY has policies and procedures that instil professional values as part of firm culture and ensure that the highest standards of objectivity, independence and integrity are maintained.

Details of the key policies and processes within EY for maintaining objectivity and independence can be found in our annual Transparency Report, which the firm is required to publish by law. The most recent version of this report is for the year ended June 2016 and can be found here:

http://www.ey.com/uk/en/about-us/ey-uk-transparency-report-2016

Appendix A Fees

A breakdown of our agreed fee is shown below.

	Planned fee 2016/17	Outturn Fee 2015/16
	£	£
The PCC for Leicestershire opinion Audit and VFM Conclusion	32,430	32,430
The CC of Leicestershire Police opinion Audit and VFM Conclusion	15,000	15,000
Audit of Joint Arrangements	5,000	5,000
Total Audit Fee – Code work	52,430	52,430
Non-audit work	0	0

All fees exclude VAT.

The agreed fee presented above is based on the following assumptions:

- Officers meeting the agreed timetable of deliverables;
- ▶ We can rely on the work of internal audit as planned;
- ► Our accounts opinion and value for money conclusion being unqualified;
- ► Appropriate quality of documentation is provided by the PCC and CC; and
- ► The PCC and CC have an effective control environment.

If any of the above assumptions prove to be unfounded, we will seek a variation to the agreed fee. This will be discussed with the Chief Finance Officer's in advance.

Fees for the auditor's consideration of correspondence from the public and formal objections will be charged in addition to the scale fee.

Appendix B UK required communications with those charged with governance

There are certain communications that we must provide to the Joint Audit, Risk and Assurance Panel (JARAP). These are detailed here:

Required communication		Re	Reference	
Planning and audit approach Communication of the planned scope and timing of the audit including any limitations.		►	Audit Plan	
Significant findings from the audit		►	Report to those charged	
Þ	Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures		with governance	
►	Significant difficulties, if any, encountered during the audit			
•	Significant matters, if any, arising from the audit that were discussed with management			
►	Written representations that we are seeking			
►	Expected modifications to the audit report			
►	Other matters if any, significant to the oversight of the financial reporting process			
Mi	sstatements	►	Report to those charged	
►	Uncorrected misstatements and their effect on our audit opinion		with governance	
►	The effect of uncorrected misstatements related to prior periods			
►	A request that any uncorrected misstatement be corrected			
►	In writing, corrected misstatements that are significant			
Fra	aud	►	Report to those charged	
•	Enquiries of the JARAP to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the entity	L	with governance	
•	Any fraud that we have identified or information we have obtained that indicates that a fraud may exist			
►	A discussion of any other matters related to fraud			
Re	lated parties	►	Report to those charged with governance	
	nificant matters arising during the audit in connection with the entity's related ties including, when applicable:			
►	Non-disclosure by management			
►	Inappropriate authorisation and approval of transactions			
►	Disagreement over disclosures			
►	Non-compliance with laws and regulations			
►	Difficulty in identifying the party that ultimately controls the entity			
Ex	ternal confirmations	►	Report to those charged with governance	
►	Management's refusal for us to request confirmations			
►	Inability to obtain relevant and reliable audit evidence from other procedures			
Co	nsideration of laws and regulations	►	Report to those charged	
•	Audit findings regarding non-compliance where the non-compliance is material and believed to be intentional. This communication is subject to compliance with legislation on tipping off	-	with governance	
•	Enquiry of the JARAP into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the JARAP may be aware of			

Re	equired communication	Re	ference	
Inc	dependence	►	Audit Plan	
Communication of all significant facts and matters that bear on EY's objectivity and independence		►	Report to those charge with governance	
Communication of key elements of the audit engagement director's consideration of independence and objectivity such as:				
►	The principal threats			
►	Safeguards adopted and their effectiveness			
►	An overall assessment of threats and safeguards			
•	Information about the general policies and process within the firm to maintain objectivity and independence			
Go	ing concern	►	Report to those charge	
Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:			with governance	
►	Whether the events or conditions constitute a material uncertainty			
•	Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements			
►	The adequacy of related disclosures in the financial statements			
Sig	gnificant deficiencies in internal controls identified during the audit	►	Report to those charge with governance	
Fe	e Information	►	Audit Plan	
►	Breakdown of fee information at the agreement of the initial audit plan	►	Report to those charge	
►	Breakdown of fee information at the completion of the audit		with governance	
		•	Annual Audit Letter if considered necessary	
Gr	oup audits	►	Audit Plan	
	oup audits An overview of the type of work to be performed on the financial information of the components	•	Audit Plan Report to those charge with governance	
•	An overview of the type of work to be performed on the financial information of the	> > >	Report to those charge	
•	An overview of the type of work to be performed on the financial information of the components An overview of the nature of the group audit team's planned involvement in the work to be performed by the component auditors on the financial information of		Report to those charge with governance Annual Audit Letter if	
Gr ►	An overview of the type of work to be performed on the financial information of the components An overview of the nature of the group audit team's planned involvement in the work to be performed by the component auditors on the financial information of significant components Instances where the group audit team's evaluation of the work of a component		Report to those charge with governance Annual Audit Letter if	

Appendix C Detailed scopes

Our objective is to form an opinion on the group's consolidated financial statements under International Standards on Auditing (UK and Ireland).

We set audit scopes for each reporting unit which together enable us to form an opinion on the group accounts. We take into account the size, risk profile, changes in the business environment and other factors when assessing the level of work to be performed at each reporting unit.

- Full scope: locations deemed significant based on size and those with significant risk factors are subject to a full scope audit, covering all significant accounts and processes using materiality levels assigned by the EY Cambridge audit team for the purposes of the consolidated audit. Procedures are full-scope in nature, but may not be sufficient to issue a stand-alone audit opinion on the local statutory financial statements (as materiality thresholds support to the consolidated audit).
- Specific scope: locations where only specific procedures are performed by the local audit team, based upon procedures, accounts or assertions identified by the EY Cambridge audit team.
- Limited Scope: limited scope procedures primarily consist of enquiries of management and analytical review. On-site or desk top reviews may be performed, according to our assessment of risk.

ISA 600 (UK and Ireland) requires that we provide you with an overview of the nature of our planned involvement in the work to be performed by the component auditors of significant locations/reporting units. Our involvement can be summarised as follows:

We will undertake a full scope audit on the PCC and CC accounts. The same audit team will be responsible for auditing the Group financial statements and the PCC and CC components.

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