Report to: Clackmannanshire Council

Date of Meeting: 28 September 2017

Subject: External Audit Final report to Members on the 2016/17Audit

Report by: Depute Chief Executive

1.0 Purpose

- 1.1. This report presents to Council the report by our external auditors, Audit Scotland, on the Council's 2016/17 audit. This report represents the completion of the first year of Audit Scotland's five year audit appointment. The report is included as Appendix 1, titled *'Clackmannanshire Council 2016/17 Annual Audit report*.
- 1.2. Following the conclusion of the audit, the final amended Financial Statements for the year ended 31st March 2017 have been placed in members' rooms in advance of this meeting to facilitate approval.

2.0 Recommendations

It is recommended that Council:

- 2.1. Notes the content of the External Audit report.
- 2.2. Agrees the final amended Financial Statements for the year ended 31 March 2017.

3.0 Considerations

- 3.1. A draft set of unaudited accounts was presented to Council at its meeting on 28th June 2017.
- 3.2. Our external auditors, Audit Scotland, have now completed the audit of these draft statements, and their report on the accounts is included within their Annual Audit Report at Appendix 1.
- 3.3. The report sets out the areas reviewed by our External Auditors as detailed in the Code of Audit Practice 2016. The Code highlights five key audit dimensions: financial sustainability; financial management; governance and transparency; value for money and best value, to provide a focus for audit review activity.

- 3.4. The report provides an independent audit opinion on the Council's annual report and accounts. It also provides an audit opinion on the trust accounts which are administered and prepared by the Council.
- 3.5. Members will note that Part 1 of the report indicates an unqualified or 'clean' audit opinion on the financial statements of both the Council and charitable trusts.
- 3.6. It is the intention of Audit Scotland to attend this Council meeting to present their Annual Report and provide a further opportunity for elected members to ask questions.

4.0 Sustainability Implications

4.1. N/A

5.0 **Resource Implications**

- 5.1. Financial Details
- 5.2. The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate.
 Yes ✓
- 5.3. Finance have been consulted and have agreed the financial implications as set out in the report. Yes ☑
- 5.4. Staffing none

6.0 Exempt Reports

6.1. Is this report exempt? Yes (please detail the reasons for exemption below) No 🗹

7.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) **Our Priorities** (Please double click on the check box \square)

The area has a positive image and attracts people and businessesIOur communities are more cohesive and inclusiveIPeople are better skilled, trained and ready for learning and employmentIOur communities are saferIVulnerable people and families are supportedISubstance misuse and its effects are reducedIHealth is improving and health inequalities are reducingIThe environment is protected and enhanced for allI

 \mathbf{N}

(2) Council Policies (Please detail)

8.0 Equalities Impact

8.1 Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?
 Yes □ No ☑

9.0 Legality

9.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes ☑

10.0 Appendices

10.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1: Audit Scotland 2016/17 Annual Audit Report

11.0 Background Papers

11.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes \blacksquare (please list the documents below) No \square

Final Financial Statements 2016/17

Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Lindsay Sim	Chief Accountant	2078

Approved by

NAME	DESIGNATION	SIGNATURE
Nikki Bridle	Depute Chief Executive	Signed: N Bridle
Elaine McPherson	Chief Executive	Signed: E McPherson

4th Floor 102 West Port Edinburgh EH3 9DN T: 0131 625 1500 E: info@audit-scotland.gov.uk www.audit-scotland.gov.uk



28 September 2017

Clackmannanshire Council Kilncraigs Greenside St Alloa FK10 1EB

Clackmannanshire Council 2016/17 Annual Audit Report

- 1. International Standard on Auditing (UK and Ireland) 260 (ISA 260) requires auditors to report specific matters arising from the audit of the financial statements to those charged with governance of a body in sufficient time to enable appropriate action. We are drawing to your attention matters for your consideration before the financial statements are approved and certified. We also present for your consideration our draft annual report on the 2016/17 audit which identifies significant findings from the financial statements audit. The section headed "Significant findings from the audit in accordance with ISA260" in the attached annual audit report sets out the issues identified. This report will be issued in final form after the financial statements have been certified.
- 2. Our work on the financial statements is now substantially complete. Subject to the satisfactory conclusion of any outstanding matters and receipt of a revised set of financial statements for final review, we anticipate being able to issue an unqualified auditor's report shortly after 28 September 2017 (the proposed report is attached at Appendix A). There are no anticipated modifications to the audit report.
- 3. In presenting this report to the Council we seek confirmation from those charged with governance of any instances of any actual, suspected or alleged fraud; any subsequent events that have occurred since the date of the financial statements; or material non-compliance with laws and regulations affecting the entity that should be brought to our attention.
- 4. We are required to report to those charged with governance all unadjusted misstatements which we have identified during the course of our audit, other than those of a trivial nature and request that these misstatements be corrected. We have no unadjusted misstatements to bring to your attention.
- 5. As part of the completion of our audit we seek written assurances from the Depute Chief Executive on aspects of the financial statements and judgements and estimates made. A draft letter of representation under ISA580 is attached at <u>Appendix B</u>. This should be signed and returned by the Depute Chief Executive with the signed financial statements prior to the independent auditor's opinion being certified.

APPENDIX A: Proposed Independent Auditor's Report

Independent auditor's report to the members of Clackmannanshire Council and the Accounts Commission

This report is made solely to the parties to whom it is addressed in accordance with Part VII of the Local Government (Scotland) Act 1973 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice approved by the Accounts Commission, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Report on the audit of the financial statements

Opinion on financial statements

I certify that I have audited the financial statements in the annual accounts of Clackmannanshire Council and its group for the year ended 31 March 2017 under Part VII of the Local Government (Scotland) Act 1973. The financial statements comprise the council-only Expenditure and Funding Analysis, the group and council-only Comprehensive Income and Expenditure Statements, Movement in Reserves Statements, Balance Sheets, the council-only Cash Flow Statement, Housing Revenue Account Income and Expenditure Statement, the Housing Revenue Account Movement in Reserves Statement, the Council Tax Income Account, the Non Domestic Rates Income Account and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and International Financial Reporting Standards (IFRSs) as adopted by the European Union, and as interpreted and adapted by the Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 (the 2016/17 Code).

In my opinion the accompanying financial statements:

- give a true and fair view in accordance with applicable law and the 2016/17 Code of the state of affairs of the council and its group as at 31 March 2017 and of the deficit on the provision of services of the council and its group for the year then ended;
- have been properly prepared in accordance with IFRSs as adopted by the European Union, as interpreted and adapted by the 2016/17 Code; and
- have been prepared in accordance with the requirements of the Local Government (Scotland) Act 1973, The Local Authority Accounts (Scotland) Regulations 2014, and the Local Government in Scotland Act 2003.

Basis of opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing in the UK and Ireland (ISAs (UK&I)). My responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of my report. I am independent of the council and its group in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standards for Auditors, and I have fulfilled my other ethical responsibilities in accordance with these requirements. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Responsibilities of the Depute Chief Executive for the financial statements

As explained more fully in the Statement of Responsibilities, the Depute Chief Executive is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Depute Chief Executive determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit and express an opinion on the financial statements in accordance with applicable legal requirements and ISAs (UK&I) as required by the Code of Audit Practice approved by the Accounts Commission. Those standards require me to comply with the Financial Reporting Council's Ethical Standards for Auditors. An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of: whether the accounting policies are appropriate to the circumstances of the council and its group and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Depute Chief Executive; and the overall presentation of the financial statements.

My objectives are to achieve reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK&I) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Other information in the annual accounts

The Depute Chief Executive is responsible for the other information in the annual accounts. The other information comprises the information other than the financial statements and my auditor's report thereon. My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on matters prescribed by the Accounts Commission to the extent explicitly stated later in this report.

In connection with my audit of the financial statements in accordance with ISAs (UK&I), my responsibility is to read all the financial and non-financial information in the annual accounts to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by me in the course of performing the audit. If I become aware of any apparent material misstatements or inconsistencies I consider the implications for my report.

Report on other requirements

Opinions on other prescribed matters

I am required by the Accounts Commission to express an opinion on the following matters. In my opinion, the auditable part of the Remuneration Report has been properly prepared in accordance with The Local Authority Accounts (Scotland) Regulations 2014. In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Management Commentary for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with statutory guidance issued under the Local Government in Scotland Act 2003; and
- the information given in the Annual Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Delivering Good Governance in Local Government: Framework (2016).

Matters on which I am required to report by exception

I am required by the Accounts Commission to report to you if, in my opinion:

- adequate accounting records have not been kept; or
- the financial statements and the auditable part of the Remuneration Report are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit; or
- there has been a failure to achieve a prescribed financial objective.

I have nothing to report in respect of these matters.

Gordon Smail Assistant Director Audit Scotland 4th Floor 102 West Port Edinburgh EH3 9DN 28 September 2017

APPENDIX B: Letter of Representation (ISA 580)

Gordon Smail Assistant Director Audit Scotland 4th Floor 102 West Port Edinburgh EH3 9DN

Dear Gordon

Clackmannanshire Council Annual Accounts 2016/17

- This representation letter is provided in connection with your audit of the financial statements of 1. Clackmannanshire Council for the year ended 31 March 2017 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view of the financial position of Clackmannanshire Council, as at 31 March 2017 and its comprehensive net expenditure for the year then ended.
- I confirm to the best of my knowledge and belief, and having made appropriate enquiries of the 2. Audit and Finance Committee, the following representations given to you in connection with your audit of Clackmannanshire Council for the year ended 31 March 2017.

General

- I acknowledge my responsibility and that of Clackmannanshire Council for the financial 3. statements. All the accounting records requested have been made available to you for the purposes of your audit. All material agreements and transactions undertaken by Clackmannanshire Council have been properly reflected in the financial statements. All other records and information have been made available to you, including minutes of all management and other meetings.
- The information given in the Annual Report to the financial statements, including the 4. Management Commentary and Remuneration Report, presents a balanced picture of Clackmannanshire Council and is consistent with the financial statements.
- I confirm that the effects of uncorrected misstatements are immaterial, individually and in 5. aggregate, to the financial statements as a whole. I am not aware of any uncorrected misstatements other than those identified in the auditor's report to those charged with governance (ISA260).

Regularity of Financial Transactions

The financial transactions of Clackmannanshire Council are in accordance with the relevant 6. legislation and regulations governing its activities and expenditure and income were incurred or applied in accordance with applicable enactments and guidance issued by the Scottish Ministers.

Financial Reporting Framework

The financial statements have been prepared in accordance with the Code of Practice on Local 7. Authority Accounting in the UK 2016/17, and in accordance with the requirements of the Local

Government (Scotland) Act 1973, the Local Authority Accounts (Scotland) Regulations 2014 and the Local Government in Scotland Act 2003, including all relevant presentational and disclosure requirements.

8. Disclosure has been made in the financial statements of all matters necessary for them to show a true and fair view of the transactions and state of affairs of Clackmannanshire Council and its group for the year ended 31 March 2017.

Accounting Policies & Estimates

- 9. All material accounting policies adopted are as shown in the Accounting Policies note included in the financial statements. The continuing appropriateness of these policies has been reviewed since the introduction of IAS 8 and on a regular basis thereafter, and takes account of the requirements set out in the Code of Practice on Local Authority Accounting in the UK 2016/17.
- **10.** The significant assumptions used in making accounting estimates are reasonable and properly reflected in the financial statements. There are no changes in estimation techniques which should be disclosed due to their having a material impact on the accounting disclosures.

Going Concern

11. I have assessed Clackmannanshire Council's ability to carry on as a going concern, as identified in the Accounting Policies, and have disclosed, in the financial statements, any material uncertainties that have arisen as a result.

Related Party Transactions

12. All transactions with related parties have been disclosed in the financial statements. I have made available to you all the relevant information concerning such transactions, and I am not aware of any other matters that require disclosure in order to comply with the requirements of IAS24, as interpreted by the Code of Practice on Local Authority Accounting in the UK 2016/17.

Events Subsequent to the Date of the Balance Sheet

- 13. There have been no material events since the date of the Balance Sheet which necessitate revision of the figures in the financial statements or notes thereto including contingent assets and liabilities.
- 14. Since the date of the Balance Sheet no events or transactions have occurred which, though properly excluded from the financial statements, are of such importance that they should be brought to your notice.

Corporate Governance

- I acknowledge as Depute Chief Executive my responsibility for the corporate governance arrangements. I confirm that I have disclosed to the auditor all deficiencies in internal control of which I am aware.
- 16. The corporate governance arrangements have been reviewed and the disclosures I have made are in accordance with the Code of Practice on Local Authority Accounting in the UK 2016/17. There have been no changes in the corporate governance arrangements or issues identified,

since the 31 March 2017, which require disclosure.

Fraud

17. I have considered the risk that the financial statements may be materially misstated as a result of fraud. I have disclosed to the auditor any allegations of fraud or suspected fraud affecting the financial statements. There have been no irregularities involving management or employees who have a significant role in internal control or that could have a material effect on the financial statements.

Assets

18. The assets shown in the Balance Sheet at 31 March 2017 were owned by Clackmannanshire Council, other than assets which have been purchased under finance leases. Assets are free from any lien, encumbrance or charge except as disclosed in the financial statements.

Liabilities

19. All liabilities have been provided for in the financial records, including the liabilities for all purchases to which title has passed prior to 31 March 2017.

Carrying Value of Assets and Liabilities

20. The assets and liabilities have been recognised, measured, presented and disclosed in accordance with Code of Practice on Local Authority Accounting in the UK 2016/17. There are no plans or intentions that are likely to affect the carrying value of classification of the assets and liabilities within the financial statements.

Provisions

21. Provisions have been made in the financial statements for all material liabilities which have resulted or may be expected to result, by legal action or otherwise, from events which had occurred by 31 March 2017 and of which Clackmannanshire Council could reasonably be expected to be aware. The amount recognised as a provision is the best estimate of the expenditure likely to be required to settle the present obligation at 31 March 2017.

Annual Leave Accrual

22. The holiday pay accrual included in the financial statements excludes any flexi time balance due at the year end as this is not considered material.

Integration Joint Boards

23. Clackmannanshire and Stirling Integration Joint Board has been consolidated within Clackmannanshire Council financial statements for 2016/17 in accordance with IAS 27 Consolidated and Separate Financial Statements and the Code of Practice on Local Authority Accounting 2016/17. The Integration Joint Board figures used in the consolidation process were based on the audited accounts for Clackmannanshire and Stirling Integration Joint Board.

Clackmannanshire Regeneration LLP

24. The financial statements appropriately disclose the relationship between Clackmannanshire Council and Clackmannanshire Regeneration LLP.

Yours sincerely

Depute Chief Executive

T: 0131 625 1500 E: info@audit-scotland.gov.uk www.audit-scotland.gov.uk



Clackmannanshire Council Kilncraigs Greenside St Alloa FK10 1EB

28 September 2017

Clackmannanshire Council Sundry Trust Funds Report to those charged with governance on the 2016/17 audit

- An audit is required for all registered charities where the local authority is the sole trustee, irrespective of the size of the charity. This is due to the interaction of section 106 of the Local Government (Scotland) Act 1973 with the Charities Accounts (Scotland) Regulations 2006. The auditor of Clackmannanshire Council, Audit Scotland, has been appointed as the auditor of the relevant trusts.
- 2. International Standard on Auditing (UK and Ireland) 260 (ISA 260) requires auditors to report specific matters arising from the audit of the financial statements to those charged with governance of a body in sufficient time to enable appropriate action. We are drawing to your attention matters for your consideration before the financial statements are approved and certified.
- 3. Our work on the financial statements is now substantially complete. Subject to the satisfactory conclusion of any outstanding matters and receipt of a revised set of financial statements for final review, we anticipate being able to issue an unqualified auditor's report shortly after 28 September 2017 (the proposed report is attached at Appendix A). There are no anticipated modifications to the audit report.
- 4. In presenting this report to the Council we seek confirmation from those charged with governance of any instances of any actual, suspected or alleged fraud; any subsequent events that have occurred since the date of the financial statements; or material non-compliance with laws and regulations affecting the entity that should be brought to our attention.
- 5. We are required to report to those charged with governance all unadjusted misstatements which we have identified during the course of our audit, other than those of a trivial nature and request that these misstatements be corrected. We have no unadjusted misstatements to bring to your attention.
- 6. The council has decided not to recharge any administration costs to the trusts in 2016/17. This policy is disclosed in the Notes to the Financial Statements. As a result the full costs incurred in administering the trusts are not known by the trustees.
- As part of the completion of our audit we seek written assurances from the Depute Chief Executive on aspects of the financial statements and judgements and estimates made. A draft

letter of representation under ISA580 is attached at Appendix B. This should be signed and returned by the Depute Chief Executive with the signed financial statements prior to the independent auditor's opinion being certified.

- 8. No material weaknesses in the accounting and internal control systems were identified during the audit which could adversely affect the ability to record, process, summarise and report financial and other relevant data so as to result in a material misstatement in the financial statements.
- 9. In our view, there were no significant findings from the audit to be brought to your attention regarding the appropriateness of accounting policies or accounting estimates and judgements, the timing of transactions, the existence of material unusual transactions or the potential effect on the financial statements of any uncertainties.

APPENDIX A: Proposed Independent Auditor's Report

Independent auditor's report to the trustees of Clackmannan District Council Charitable Trust, Clackmannanshire Educational Trust, Tillicoultry Old Age Pensioners Outing Fund, Old Folks Welfare Fund (Clackmannanshire Council Sundry Trust Funds) and the Accounts Commission

This report is made solely to the parties to whom it is addressed in accordance with Part VII of the Local Government (Scotland) Act 1973 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice approved by the Accounts Commission, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Report on the audit of the financial statements

Opinion on financial statements

I certify that I have audited the financial statements in the statement of accounts of Clackmannanshire Council Sundry Trust Funds for the year ended 31 March 2017 under Part VII of the Local Government (Scotland) Act 1973 and section 44(1)(c) of the Charities and Trustee Investment (Scotland) Act 2005. The financial statements comprise the Trustees' Annual Report, the Statement of Receipts and Payments, the Statement of Balances and notes to the financial statements. The financial reporting framework that has been applied in their preparation is applicable law and a receipts and payments basis.

In my opinion the accompanying financial statements:

- properly present the receipts and payments of the charities for the year ended 31 March 2017 and their statement of balances at that date; and
- have been prepared in accordance with the requirements of the Charities and Trustee Investment (Scotland) Act 2005, and regulations 9(1), (2) and (3) of The Charities Accounts (Scotland) Regulations 2006.

Basis of opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing in the UK and Ireland (ISAs (UK&I)). My responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of my report. I am independent of the charities in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standards for Auditors, and I have fulfilled my other ethical responsibilities in accordance with these requirements. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Responsibilities of the trustees for the financial statements

The trustees are responsible for the preparation of financial statements which properly present the receipts and payments of the charities and for such internal control as the trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit and express an opinion on the financial statements in accordance with applicable legal requirements and ISAs (UK&I) as required by the Code of Audit Practice approved by the Accounts Commission. Those standards require me to comply with the Financial Reporting Council's Ethical Standards for Auditors. An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of: whether the accounting policies are appropriate to the circumstances of the charity and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the trustees; and the overall presentation of the financial statements.

My objectives are to achieve reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK&I) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Other information in the statement of accounts

The trustees are responsible for the other information in the statement of accounts. The other information comprises the information other than the financial statements and my auditor's report thereon. My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on matters prescribed by the Accounts Commission or required by applicable law to the extent explicitly stated later in this report. In connection with my audit of the financial statements in accordance with ISAs (UK&I), my responsibility is to read all the financial and non-financial information in the statement of accounts to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by me in the course of performing the audit. If I become aware of any apparent material misstatements or inconsistencies I consider the implications for my report.

Report on other requirements

Opinion on other prescribed matter

I am required by the Accounts Commission to express an opinion on the following matter. In my opinion, based on the work undertaken in the course of the audit the information given in the Trustees' Annual Report for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with The Charities Accounts (Scotland) Regulations 2006.

Matters on which I am required to report by exception

I am required by The Charity Accounts (Scotland) Regulations 2006 to report to you if, in my opinion:

- proper accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit.

I have nothing to report in respect of these matters.

Tom Reid Senior Audit Manager Audit Scotland 4th Floor 8 Nelson Mandela Place Glasgow G2 1BT 28 September 2017

Tom Reid is eligible to act as an auditor in terms of Part VII of the Local Government (Scotland) Act 1973.

APPENDIX B: Letter of Representation (ISA 580)

Tom Reid Senior Audit Manager Audit Scotland 4th Floor 8 Nelson Mandela Place Glasgow G2 1BT

Clackmannanshire Council Sundry Trust Funds Annual Accounts 2016/17

- 1. This representation letter is provided in connection with your audit of the financial statements of Clackmannanshire Council Sundry Trust Funds for the year ended 31 March 2017 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view of the financial position of Clackmannanshire Council Sundry Trust Funds, as at 31 March 2017 and its comprehensive net expenditure for the year then ended.
- 2. I confirm to the best of my knowledge and belief, and having made appropriate enquiries of the Audit and Finance Committee, the following representations given to you in connection with your audit of Clackmannanshire Council Sundry Trust Funds for the year ended 31 March 2017.
- **3.** I confirm that the four trusts presented for audit are all the trusts that require an audit, where the sole trustee is Clackmannanshire Council.

General

- 4. I acknowledge my responsibility and that of Clackmannanshire Council Sundry Trust Funds for the financial statements. All the accounting records requested have been made available to you for the purposes of your audit. All material agreements and transactions undertaken by Clackmannanshire Council Sundry Trust Funds have been properly reflected in the financial statements. All other records and information have been made available to you, including minutes of all management and other meetings.
- 5. The information given in the Trustee Report presents a balanced picture of Clackmannanshire Council Sundry Trust Funds and is consistent with the financial statements.
- 6. I confirm that the effects of uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as a whole. I am not aware of any uncorrected misstatements other than those identified in the auditor's report to those charged with governance (ISA260).

Regularity of Financial Transactions

7. The financial transactions of Clackmannanshire Council Sundry Trust Funds are in accordance with the relevant legislation and regulations governing its activities and expenditure and income were incurred or applied in accordance with applicable enactments and guidance issued by the Scottish Ministers.

Financial Reporting Framework

- 8. The financial statements have been prepared in accordance with Code of Practice on Local Authority Accounting in the UK 2016/17, and in accordance with the requirements of Local Government (Scotland) Act 1973, the Local Authority Accounts (Scotland) Regulations 2014 and the Local Government in Scotland Act 2003, including all relevant presentational and disclosure requirements.
- 9. Disclosure has been made in the financial statements of all matters necessary for them to show a true and fair view of the transactions and state of affairs of Clackmannanshire Council Sundry Trust Funds for the year ended 31 March 2017.

Accounting Policies & Estimates

- 10. All material accounting policies adopted are as shown in the Accounting Policies note included in the financial statements. The continuing appropriateness of these policies has been reviewed since the introduction of IAS 8 and on a regular basis thereafter, and takes account of the requirements set out in the Code of Practice on Local Authority Accounting in the UK 2016/17.
- 11. The significant assumptions used in making accounting estimates are reasonable and properly reflected in the financial statements. There are no changes in estimation techniques which should be disclosed due to their having a material impact on the accounting disclosures.

Going Concern

12. I have assessed Clackmannanshire Council Sundry Trust Funds ability to carry on as a going concern, as identified in the Accounting Policies note, and have disclosed, in the financial statements, any material uncertainties that have arisen as a result.

Related Party Transactions

13. All transactions with related parties have been disclosed in the financial statements. I have made available to you all the relevant information concerning such transactions, and I am not aware of any other matters that require disclosure in order to comply with the requirements of IAS24, as interpreted by the Code of Practice on Local Authority Accounting in the UK 2016/17.

Events Subsequent to the Date of the Balance Sheet

- 14. There have been no material events since the date of the Balance Sheet which necessitate revision of the figures in the financial statements or notes thereto including contingent assets and liabilities.
- **15.** Since the date of the Balance Sheet no events or transactions have occurred which, though properly excluded from the financial statements, are of such importance that they should be brought to your notice.

Corporate Governance

 I acknowledge as Depute Chief Executive my responsibility for the corporate governance arrangements. I confirm that I have disclosed to the auditor all deficiencies in internal control of which I am aware. 17. The corporate governance arrangements have been reviewed and the disclosures I have made are in accordance with the Code of Practice on Local Authority Accounting in the UK 2016/17. There have been no changes in the corporate governance arrangements or issues identified, since the 31 March 2017, which require disclosure.

Fraud

18. I have considered the risk that the financial statements may be materially misstated as a result of fraud. I have disclosed to the auditor any allegations of fraud or suspected fraud affecting the financial statements. There have been no irregularities involving management or employees who have a significant role in internal control or that could have a material effect on the financial statements.

Assets

19. The assets shown in the Balance Sheet at 31 March 2017 were owned by Clackmannanshire Council Sundry Trust Funds, other than assets which have been purchased under finance leases. Assets are free from any lien, encumbrance or charge except as disclosed in the financial statements.

Liabilities

20. All liabilities have been provided for in the financial records, including the liabilities for all purchases to which title has passed prior to 31 March 2017.

Carrying Value of Assets and Liabilities

21. The assets and liabilities have been recognised, measured, presented and disclosed in accordance with the Code of Practice on Local Authority Accounting in the UK 2016/17. There are no plans or intentions that are likely to affect the carrying value of classification of the assets and liabilities within the financial statements.

Yours sincerely

Depute Chief Executive

Providing services to the Auditor General for Scotland and the Accounts Commission ${\color{black} 52}$

Clackmannanshife Council Draft 2016/17 Annual Audit Report

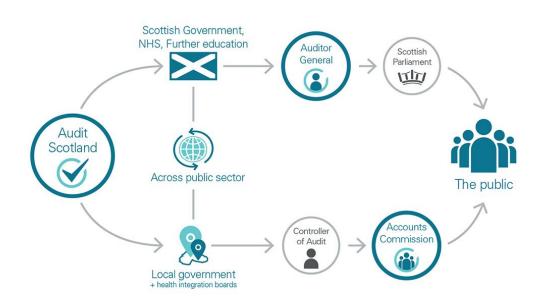
AUDIT SCOTLAND

To Members of Clackmannanshire Council and the Controller of Audit September 2017

Who we are

The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.
- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.
- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.



About us

Our vision is to be a world-class audit organisation that improves the use of public money.

Through our work for the Auditor General and the Accounts Commission, we provide independent assurance to the people of Scotland that public money is spent properly and provides value. We aim to achieve this by:

- carrying out relevant and timely audits of the way the public sector manages and spends money
- reporting our findings and conclusions in public
- identifying risks, making clear and relevant recommendations.

Contents

Key messages	4
Introduction	5
Part 1 Audit of 2016/17 annual report and accounts	7
Part 2 Financial management	11
Part 3 Financial sustainability	16
Part 4 Governance and transparency	20
Part 5 Value for money	24
Appendix 1 Action plan 2016/17	26
Appendix 2 Significant audit risks identified during planning	29
Appendix 3 Summary of national performance reports 2016/17	32

Key messages

Audit of the 2016/17 annual accounts

1 Our audit opinions are unqualified and cover the financial statements, the management commentary, the annual governance statement and aspects of the remuneration report. We have also issued unqualified opinions for the trusts administered by the Council.

Financial management

- 2 The Council operated within its revenue budget for 2016/17, partly because spending in key service areas was less than planned. Savings targets for the year were not achieved.
- **3** The trend of underspending against the capital budget continued in 2016/17, with risks to effective service delivery and the achievement of the Council's strategic priorities.
- 4 The Council has appropriate internal controls in place within main financial systems, with scope to strengthen in some areas.
- **5** The Council has made limited progress in investigating National Fraud Initiative matches.

Financial sustainability

6 The Council continues to experience acute financial pressures. It has identified substantial funding gaps in each of the next three years and faces difficult decisions if it is to achieve financial balance in the medium term.

Governance and transparency

- 7 The Council's governance arrangements provide an appropriate framework for decision-making.
- 8 The Council is open and transparent in the way it conducts its business, with public access to meetings of the Council and its committees.

Value for money

- **9** The Best Value Assurance Report for Clackmannanshire Council will be considered by the Accounts Commission early in 2018.
- **10** The Council's arrangements for the publication of statutory performance indicators are satisfactory.

Introduction

- **1.** This report is a summary of the findings arising from the 2016/17 audit of Clackmannanshire Council.
- The scope of the audit was set out in our Annual Audit Plan presented to the March 2017 meeting of the Audit and Finance Committee. This report comprises:
 - an audit of the annual report and accounts
 - consideration of the four dimensions that frame the wider scope of public sector audit requirements as shown in <u>Exhibit 1</u>.



Source: Code of Audit Practice 2016

3. The main elements of our audit work in 2016/17 have been:

- an interim audit of the Council's main financial systems and governance arrangements
- an audit of the Council's 2016/17 annual report and accounts including the issue of an independent auditor's report setting out our opinions.
- 4. The Accounts Commission agreed the overall framework for a new approach to auditing Best Value in June 2016. Best Value will be assessed over the five year audit appointment, as part of the annual audit work. In addition a Best Value Assurance Report (BVAR) for each council will be considered by the Accounts Commission at least once in this five year period. The BVAR for Clackmannanshire Council will be considered by the Accounts Commission

57

early in 2018. The BVAR will provide a detailed assessment of areas within the scope of our Best Value audit work.

- 5. Clackmannanshire Council is responsible for preparing the annual report and accounts that show a true and fair view in accordance with the Local Authority Accounts (Scotland) Regulations 2014. It is also responsible for establishing effective governance arrangements and ensuring financial management is effective.
- Our responsibilities as independent auditor are established by the Local Government in Scotland Act 1973 and the <u>Code of Audit Practice 2016</u> guided by the auditing profession's ethical guidance.
- 7. As public sector auditors we provide an independent auditor's report on the annual report and accounts. We also review and report on the arrangements within Clackmannanshire Council to manage its performance and use of resources such as money, staff and assets. Additionally, as indicated above, we report on the Council's Best Value arrangements. In doing this, we aim to support improvement and accountability.
- Further details of the respective responsibilities of management and the auditor can be found in the <u>Code of Audit Practice 2016</u>.
- **9.** This report raises matters from the audit of the annual report and accounts, risks or control weaknesses. Communicating these does not absolve management from its responsibility to address the issues we raise, and to maintain adequate systems of control.
- **10.** Our annual audit report contains an action plan at <u>Appendix 1 (page 26)</u>. It sets out specific recommendations, responsible officers and dates for implementation.
- 11. As part of the requirement to provide fair and full disclosure of matters relating to our independence, we can confirm that we have not undertaken non-audit related services. The 2016/17 audit fee for the audit was set out in our Annual Audit Plan and as we did not carry out any work additional to our planned audit activity, the fee remains unchanged.
- **12.** This report is addressed to both the Council and the Controller of Audit and will be published on Audit Scotland's website <u>www.audit-scotland.gov.uk</u>.
- **13.** We would like to thank all management and staff who have been involved in our work for their co-operation and assistance during the audit.

Part 1 Audit of 2016/17 annual report and accounts

Main judgements

The financial statements of Clackmannanshire Council give a true and fair view of the state of its affairs and of its net expenditure for the year

Our audit opinions are all unqualified. These cover the financial statements, the management commentary, the annual governance statement and aspects of the remuneration report.

We issued an unqualified opinion for the trusts administered by the Council.

Unqualified audit opinions

- **14.** The financial statements for the year ended 31 March 2017 were approved by the Council on 28 September 2017. We reported, within our independent auditor's report:
 - an unqualified opinion on the financial statements
 - unqualified opinions on the management commentary, the annual governance statement and the remuneration report.
- **15.** Additionally, we have nothing to report in respect of those matters which we are required by the Accounts Commission to report by exception.

Audit of charitable trusts administered by the Council

- **16.** Due to the interaction of the Local Government in Scotland Act 1973 with the charities legislation, a full and separate audit and auditor's report is required for each registered charity where members of the Council are sole trustees, irrespective of the size of the charity.
- **17.** Our duties as auditors of the charitable trusts administered by the Council are to:
 - express an opinion on whether the financial statements properly present the charitable trusts' financial position and are properly prepared in accordance with charities legislation
 - read the trustees' annual report and express an opinion as to whether it is consistent with the financial statements
 - report on other matters by exception to the trustees and to the Office of the Scottish Charity Regulator.

The Council's annual report and accounts are the principal means of accounting for the stewardship of its resources and its performance in the use of its resources. **18.** We issued an unqualified audit opinion in respect of the 2016/17 financial statements of Clackmannanshire Council Sundry Trust Funds.

Submission of the Council's financial statements for audit

- **19.** We received the unaudited financial statements on 30 June 2017, in line with the audit timetable set out in our 2016/17 Annual Audit Plan. In 2016/17, for the first time, the Council's group financial statements included the financial results of Clackmannanshire and Stirling Integration Joint Board.
- **20.** The working papers provided with the unaudited financial statements were of a good standard although a clearer audit trail could have been provided for some account areas. Finance staff provided good support to the audit team during the audit.

Risk of material misstatement

21. <u>Appendix 2</u> provides a description of those assessed risks of material misstatement that were identified during the planning process which had the greatest effect on the overall audit strategy, the allocation of resources to the audit and directing the efforts of the audit team. Also, included within the appendix are wider audit dimension risks, how we addressed these and conclusions.

Materiality

- 22. Materiality defines the maximum error that we are prepared to accept and still conclude that that our audit objective has been achieved (i.e. true and fair view). The assessment of what is material is a matter of professional judgement. It involves considering both the amount and nature of the misstatement.
- **23.** Our initial assessment of materiality for the financial statements was undertaken during the planning phase of the audit. Specifically with regard to the financial statements, we assess the materiality of uncorrected misstatements, both individually and collectively.
- 24. On receipt of the financial statements and following completion of audit testing we reviewed our original materiality calculations and concluded that they remained appropriate. The materiality levels we applied during the audit are summarised in Exhibit 2.

Exhibit 2 Materiality values

Materiality level	Amount
Overall materiality – This is the calculated figure we use in assessing the overall impact of audit adjustments on the financial statements. It was set at 1% of gross expenditure for the year ended 31 March 2017.	£1.8 million
Performance materiality – This acts as a trigger point. If the aggregate of errors identified during the financial statements audit exceeds performance materiality this would indicate that further audit procedures should be considered. Using our professional judgement we have calculated performance materiality at 50% of overall materiality.	£0.9 million
Reporting threshold (i.e. clearly trivial) – We are required to report to those charged with governance on all unadjusted misstatements in excess of the 'reporting threshold'	£20,000

60

Materiality level

amount. This has been calculated at 1% of overall materiality, rounded up to £20,000.

Source: Audit Scotland Annual Audit Plan 2016/17

Evaluation of misstatements

- **25.** We identified some monetary errors within the unaudited financial statements which exceeded our reporting threshold. Following discussions with officers, all of these were amended in the audited financial statements.
- **26.** The net effect of these adjustments is to increase the net cost of services in the comprehensive income and expenditure account by £0.1 million and reduce the general fund balance by the same amount.
- 27. In line with practice at other councils, the comprehensive income and expenditure account has been adjusted to show payments made to and income received from Clackmannanshire and Stirling Integration Joint Board. This increases gross income and expenditure by £16.518 million with no effect on the net cost of services in the comprehensive income and expenditure account or the general fund balance.

Significant findings

 International Standard on Auditing 260 (UK & Ireland) requires us to communicate to you significant findings from the audit. These are summarised in <u>Exhibit 3</u>.

Exhibit 3 Significant findings from the audit

Issue

1. Provision for damages claims

The Council's 2015/16 financial statements included a provision of £0.3 million to meet the costs of settling a damages claim made against the Council by a contractor. The claim related to the award of a contract for works on Council properties. The provision was based on internal and external legal advice and expert external quantity surveyor advice on the likely outcome of the claim. An element of the claim was settled in 2016/17 resulting in total costs to the Council of £0.816 million. This fully utilised the existing provision and resulted in significant unanticipated expenditure. It is likely that the Council will incur further costs in concluding this action.

Resolution

An additional provision of \pounds 0.150 million is included in the Council's 2016/17 financial statements based on legal advice on the likely final costs for the damages claim.

Amount

Other findings

29. During our audit testing we noted differences between the revaluation reserve values recorded in the Council's fixed asset register and the corresponding values recorded in its financial ledger. The individual differences are not material and the net book values for each category of asset have been correctly recorded in the financial statements. It is important that the Council maintains an accurate record of its assets to ensure it correctly accounts for these in future years.

Recommendation 1

The Council should review its fixed asset register and take corrective action to ensure individual assets are accurately recorded.

30. In addition to the monetary misstatements identified above, we also noted a number of presentational and disclosure issues which we discussed with management. These were adjusted and reflected in the final version of the annual report and accounts.

Part 2 Financial management



Main judgements

The Council operated within its revenue budget for 2016/17, partly because spending in key service areas was less than planned. Savings targets for the year were not achieved.

The trend of underspending against the capital budget continued in 2016/17, with risks to effective service delivery and the achievement of the Council's strategic priorities.

The Council has appropriate internal controls in place within main financial systems, with scope to strengthen in some areas.

The Council has made limited progress in investigating National Fraud Initiative matches.

Financial performance in 2016/17

- 31. The Council recorded a general fund revenue underspend of £1.218 million against its 2016/17 budget of £118.353 million. The Council did not achieve the full level of savings agreed in the 2016/17 budget but was able to deliver services within budget through compensating savings, restricting spending and net underspends within services. The more significant over and underspends are summarised in Exhibit 4.
- 32. Members are kept informed of the budget position through quarterly outturn reports and regular budget strategy update reports. These reports also provide an update on the Council's progress in achieving agreed savings. The 2016/17 budget included approved savings of £7.501 million of which £4.773 million (64%) were achieved in-year. This shortfall was mainly because savings from voluntary redundancy and from redesign of adult and older people's services were less than anticipated. The Council will need to continue to review budgets closely to identify achievable savings and efficiencies.

Financial management is about financial capacity, sound budgetary processes and whether the control environment and internal controls are operating effectively. 12 |

Exhibit 4 Summary of significant over and under spends against budget in 2017/18

Area	Under/over spend (£m)	Main reason(s) for variance
Underspends		
Housing	£1.477	Rent rebates were less than forecast. There were also reduced costs for billing and assessment.
Development and Environment Services	£0.774	Roads costs were lower than expected due to milder winter weather. Additional efficiencies and cash savings were made in environmental services.
Education	£0.506	Supply teaching costs for secondary schools were less than anticipated.
Overspends		
Social Services	£1.248	Reablement service staff costs and home and residential care services costs were higher than expected.
Resources and Governance	£0.502	Payments for the contract damages claim made against the Council by a contractor were higher than expected.

Housing Revenue Account

- **33.** The Council is required by legislation to maintain a separate housing revenue account (HRA) and to ensure that rents are set to at least cover the costs of its social housing provision. Rent levels are therefore a direct consequence of the budget set for the year.
- 34. The Council made a budget surplus of £6.175 million in 2016/17 on its HRA. This was higher than the budgeted surplus of £4.918 million, due mainly to reduced costs for property repairs and maintenance and property supervision and management. The Council made a contribution to capital of £4.912 million to fund future improvements to its housing stock to continue progress towards achievement of the Scottish Housing Quality Standard. The residual surplus in the year of £1.263 million was earmarked to support delivery of the Council's housing business plan.
- **35.** The balance on the HRA at the end of the 2016/17 financial year increased to £1.973 million. We concluded that the operation of the Council's HRA is currently financially sustainable.

Borrowing in 2016/17

36. The Council borrows to support its investment and development of long term assets. The Council had outstanding loans of £146.149 million at 31 March 2017, a decrease of £0.216 million on the previous year. The movement was made up of £1.094 million additional borrowing to fund the Council's capital

programme and Private Finance Initiative and finance lease repayments of £1.310 million. The Council's borrowing remained with its external borrowing limit for 2016/17 of £155.850 million set out in its treasury management strategy.

- 37. During the year Audit Scotland received correspondence on a number of councils using Lender Option Borrower Option (LOBO) loans. This concerned whether these loans represent value for money. A LOBO loan is typically a long term loan where the interest rate is initially fixed but the lender has the option to propose or impose on pre-determined future dates, a new fixed interest rate. The borrower has the option to either pay the revised interest rate or to repay the loan.
- 38. The Council had around £5 million of these standard LOBOs at 31 March 2017. We have reviewed supporting papers including an analysis of the LOBOs held by the Council and comparable PWLB rates of interest and the Council's treasury management policies and controls. We found no issues with the Council's use of LOBO loans.

Capital programme 2016/17

- **39.** Total capital expenditure in 2016/17 was £16.739 million, of which £8.254 million related to general services and £8.485 million to the HRA.
- 40. Net capital spend in 2016/17 was £11.107 million below budget (52%). This continues a trend in recent years and follows on from underspends of £13.845 million (70%) and £9.829 million (62%) in 2014/15 and 2015/16 respectively. The HRA accounted for 62% of the total underspend in 2016/17.
- **41.** The underspending in 2016/17 was due to a range of circumstances, the most significant of which are:
 - Community Investment Strategy (£3.023 million) due to delays in progressing a number of individual projects.
 - Childcare Residential Unit (£0.978 million) the capital investment was deferred to establish need and demand as a consequence of new service delivery models being put in place.
 - HRA (£6.842 million) due to higher than expected income from sales of Council property and land and delays in the repairs and refurbishment programme.
- **42.** There was regular reporting to members which highlighted the position in the programme. The trend in recent years may be indicative of poor project management or problems with the profiling of expenditure. There is a risk that recurring underspending could lead to slippage in the capital programme which in turn could adversely affect service delivery and achievement of the council's strategic priorities.

Recommendation 2

The Council should review its arrangements for managing the capital programme to ensure they are effective.

Budgetary monitoring and control

43. The detailed scrutiny of financial performance is delegated to the Audit and Finance committee which receives regular revenue and capital monitoring reports. These reports provide an overall picture of the budget position at

65

service level. The reports also forecast outturn position for the year and include explanations for significant variances against budget. They provide sufficient information to allow members to scrutinise the Council's finances.

Financial capacity within the Council

- **44.** The Section 95 officer (or chief financial officer) is responsible for council finances. At Clackmannanshire Council, the Depute Chief Executive is the Section 95 officer. She is a member of the senior management team and has direct access to the Chief Executive and Council members. We concluded that the Section 95 officer has appropriate status within the Council.
- **45.** The Council has found it difficult to recruit suitably qualified and experienced finance staff. As a result, the finance team has vacancies and management is considering options to increase capacity and to secure succession planning. These include joint recruitment and training arrangements with other Councils.
- **46.** Following the Council elections in May 2017, there a number of new members. It is important that they receive adequate training on how the Council works and how it is financed to support them in their roles. We reviewed the induction training and materials provided to members and concluded that it was fit for purpose. Officers also hold all-member briefings to discuss important areas in more detail, for example the budget setting process.

Internal controls

- **47.** As part of our audit we identify and inspect the key internal controls in those accounting systems which we regard as significant for the production of the financial statements. Our objective is to gain assurance that the Council has systems of recording and processing transactions which provide a sound basis for the preparation of the financial statements.
- **48.** Our findings were included in our interim audit report that was presented to the Council in June 2017. We identified some areas where controls were not operating as expected or where improvements could be made. No significant control weaknesses were identified which could affect the Council's ability to record, process, summarise and report financial and other relevant data so as to result in a material misstatement in the financial statements.

Prevention and detection of fraud

- **49.** We have responsibility for reviewing the arrangements put in place by management for the prevention and detection of fraud. We reviewed the Council's arrangements including policies and codes of conduct for staff and elected members, whistleblowing, fraud prevention and fraud response plan.
- **50.** Based on the evidence we reviewed, we concluded that the Council has adequate arrangements in place for the prevention and detection of fraud.

National Fraud Initiative

- 51. The National Fraud Initiative (NFI) in Scotland is a counter-fraud exercise coordinated by Audit Scotland. It uses computerised techniques to compare information about individuals held by different public bodies, and on different financial systems, to identify 'matches' that might suggest the existence of fraud or error.
- **52.** The latest position on NFI investigations by the Council is summarised in <u>Exhibit 5</u>.



- **53.** <u>Exhibit 5</u> shows that the Council has made limited progress in investigating NFI matches with only 2% of matches reviewed as of August 2017. Until matches are investigated, there is a risk that frauds and errors are not identified and continue.
- **54.** We would have expected more prompt engagement from the Council with the NFI exercise, in particular, by commencing match prioritisation and investigation work earlier. Although we understand that action is being taken, we have concerns about the Council's capacity to deliver the NFI exercise.
- **55.** We will be carrying out a final follow-up of NFI match investigations and outcomes in February 2018 by which time we would expect the Council to have completed its work on matches and recorded outcomes in the NFI system. In accordance with our usual practice, we will prepare a biennial national NFI report which will consider the level of engagement in the 2016/17 exercise.

Recommendation 3

The Council should work to complete its review of priority NFI matches and ensure it identifies suitable resource to carry out this work.

Part 3 Financial sustainability



Main judgements

The Council continues to experience acute financial pressures. It has identified substantial funding gaps in each of the next three years and faces difficult decisions if it is to achieve financial balance in the medium term.

Financial planning

- 56. It is important that long term financial strategies (typically covering five years or more) are in place which link spending to the Council's priorities. Although councillors approve budgets for a single year, this should be supported by indicative future spending plans (covering three years at least) that forecast the impact of relevant financial pressures and how these will be addressed.
- 57. The Council's budget strategy sets out its financial planning assumptions and indicative savings for a rolling four year period. This covers the current year and the following three years. The Council uses scenario planning to forecast cumulative indicative funding gaps in a best, median (most likely) and worst case scenario. These scenarios, which are regularly reviewed, are based on different sets of assumptions for key variables including:
 - level of general revenue grant
 - council tax and non domestic rates income
 - pay awards
 - inflation
 - fees and charges.
- 58. We found evidence that while members received regular updates on the budget strategy throughout 2016/17 and are aware of the spending plans and financial challenges; the Council has yet to develop longer-term financial strategies covering at least five years.
- **59.** The Council describes its approach to financial planning as focusing on:
 - reducing expenditure
 - maximising income
 - redesigning service provision

Financial sustainability looks forward to the medium and longer term to consider whether the body is planning effectively to continue to deliver its services or the way in which they should be delivered. implementing other targeted initiatives to deliver high quality services to form a sustainable cost base.

These are also the aims of its business change programme, Making Clackmannanshire Better. The Council, through its budget strategy, aligns budget decisions with these aims. Further work is required to ensure there is a clearer link between all budget decisions and the priorities outlined in the Council's corporate plan.

60. The Council is planning to work to ensure savings plans and financial projections reflect the objectives, priorities and structures required to ensure the achievement of the Council's ambitions. This is an important exercise, particularly given that the Council is refreshing its corporate plan, Taking Clackmannanshire Forward.

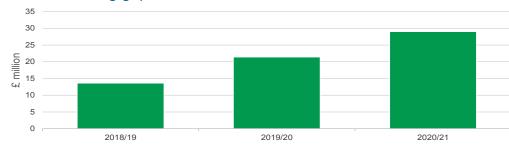
Recommendation 4

The Council should work to ensure savings plans and financial projections are aligned with its refreshed priorities.

Funding position

- 61. The Council approved its 2017/18 budget in March 2017. It set a general services revenue budget of £118.096 million which included agreed savings of £6.804 million. This left a budget gap of £3.531 million which the Council plans to meet through contributions from reserves.
- **62.** The Council is facing significant challenges in maintaining a sustainable financial position. These include rising demands for services, increasing costs and reductions in central government funding.
- 63. The Council is forecasting likely funding gaps for 2018/19 to 2020/21 of £13.618 million, £21.388 million and £28.997 million respectively as illustrated in Exhibit 6. As a proportion of net expenditure these are among the highest funding gaps of any Scottish local authority.

Exhibit 6



Identified funding gaps 2018/19 - 2020/21

Source: Clackmananshire Council: Budget Strategy Update, 31 August 2017

Reserves

64. The level of usable reserves held by the Council decreased from £18.477 million to £16.044 million in 2016/17. The Council's general fund balance was £10.073 million at March 2017. This reserve has no restrictions on its use. Its

main purpose is to provide a contingency to meet unexpected expenditure and as a working balance to help cushion the impact of uneven cash flows.

65. The Council reviews the level of its uncommitted reserves when setting the budget each year. The Council's reserves strategy specifies that it should retain uncommitted reserves at a minimum level of 3% of net expenditure. The uncommitted element of the general fund at 31 March 2017 was £4.839 million which represents 4.4% of net expenditure. Previous external audit reports highlighted the Council's use of reserves to balance budgets and concluded that this was not sustainable. We concur with this view and note that without further and effective action the Council's stated reserves strategy may be at risk.

Savings plans

- **66.** The Council plans to achieve its 2017/18 savings target of £6.804 million through:
 - policy savings = £1.951 million
 - management efficiencies = £2.737 million
 - managed contraction of workforce = £0.391 million
 - service redesign = £0.463 million
 - budget savings approved in 2016/17 = £1.262 million.
- **67.** Officers regularly report progress in achieving agreed savings to the Council and the Audit and Finance Committee. The latest position was reported to the Audit and Finance Committee in September 2017. This indicated that:
 - £4.059 million of savings were green (on track to be delivered)
 - £2.040 million were amber (progressing to be delivered or a partial saving will be achieved)
 - £0.705 million were red (unachievable).

Services have been asked to identify compensatory savings for those savings that will not be achieved in 2017/18.

- **68.** The Council recognises that it cannot continue to use reserves to meet funding gaps. The Council agreed a new strategic model in March 2017. Successful implementation of the new model for service delivery is necessary if the Council is to meet the funding gaps it has identified for the next three years. The design creates three broad categories of Council service:
 - People services focused on individuals, families or groups of individuals with certain needs
 - Place services focused on environments and geographic areas
 - Performance services which support the Council to deliver its people and place priorities.
- **69.** The new model will focus on integrated management of multi-disciplinary teams. The Council plans to review all services to determine the level at which they are most effectively and efficiently delivered. It aims to create opportunities to reduce the level of resources required to deliver services and, as a result, make significant savings. The Chief Executive is developing a new

organisational structure and plans to present this to members for approval by the end of 2017. The Council has yet to identify the savings achievable from redesigning how it delivers services.

Recommendation 5

The Council should work to develop savings plans to address the substantial funding gaps it has identified in each of the next three years. This should include identification of the savings it expects to achieve from its new strategic model.



Main Judgements

The Council's governance arrangements provide an appropriate framework for organisational decision-making.

The Council is open and transparent in the way it conducts its business, with public access to its meetings of the Council and its committees.

Governance arrangements

- **70.** Members and management of the Council are responsible for establishing arrangements to ensure that its business is conducted in accordance with the law and proper standards, that public money is safeguarded and for monitoring the adequacy and effectiveness of these arrangements.
- **71.** The Council's corporate governance framework is centred on the full Council, supported by its standing committees. Council and committee meetings are well attended by elected members and papers are subject to a good level of scrutiny.
- **72.** A key feature of the year was political change with changes to the administration of the Council during 2016/17. In May 2016, the SNP administration resigned and Labour took up leadership of the Council in June 2016. The Labour administration subsequently resigned in February 2017, with the SNP taking over as the Council administration. Whilst good governance was maintained it did impact on the business of the council and meant additional pressures on Council staff. For example, in supporting budget revisions.
- **73.** Until June 2016, the Council had a service committee structure with a Resources and Audit Committee chaired by an independent councillor. The Council's governance arrangements were revised following the change in administration. This resulted in the Resources and Audit Committee being replaced with an Audit and Finance Committee chaired by a member of the administration and a Scrutiny Committee chaired by an opposition councillor. Good practice recommends that the Chair of an audit committee should be from the opposition or, in some instances, independent of the Council. We note that the Council has plans in development to refresh decision making arrangements alongside its whole organisation redesign. We will review whether these arrangements support full and effective scrutiny of performance.
- **74.** Overall, we concluded that the Council's governance arrangements provide an appropriate framework for organisational decision-making.

Governance and transparency is concerned with the effectiveness of scrutiny and governance arrangements, leadership and decision making and transparent reporting of financial and performance information.

Management commentary and the annual governance statement

- **75.** The Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 requires councils to prepare and publish, along with their financial statements, an annual governance statement and a management commentary (or equivalent) that are consistent with the disclosures made in the financial statements. The management commentary should be fair, balanced and understandable and also clearly address the longer term financial sustainability of the body.
- **76.** Based on our knowledge and work performed, we concluded that the management commentary and the annual governance statement are consistent with the financial statements. We identified some improvements which could be made to the management commentary and annual governance statement. These include:
 - a more comprehensive analysis of business performance should be provided in the management commentary
 - the annual governance statement should include more detail on what the Council is doing to address areas it has identified for improvement.

Internal audit

- **77.** Internal audit provides senior management and elected members with independent assurance on the Council's overall risk management, internal control and corporate governance processes. The internal audit function was carried out by an in-house team in 2016/17.
- 78. The Council began a one year pilot joint working agreement with Falkirk Council on 1 April 2017 for the provision of a jointly resourced internal audit service to Clackmannanshire Council. Falkirk Council provides management and resources under the terms of the agreement. Falkirk Council's internal audit manager is responsible for leading the jointly resourced service. We will review how effectively this arrangement is working as part of our 2017/18 review of the adequacy of internal audit.
- **79.** To avoid duplication of effort we place reliance on the work of internal audit wherever possible. We did not place any formal reliance on internal audit reviews for the purpose of obtaining direct assurance for our financial statements work. We considered the findings of a number of internal audit reports as part of our wider dimension work.

Transparency

- **80.** Transparency means that the public, in particular local residents, have access to understandable, relevant and timely information about how the Council is taking decisions and how it is using resources such as money, people and assets.
- 81. There is evidence from a number of sources which demonstrate the Council's commitment to transparency. Members of the public can attend meetings of the full Council and other committees. Minutes of these committee meetings and supporting papers are available on the Council's website.
- 82. The Council's website provides public access a wide range of information including the register of members' interests, current consultations and surveys and how to make a complaint. In addition, the website provides details of the citizen's panel. The Council makes its annual accounts available on its website.

83. Overall, we concluded that the Council conducts its business in an open and transparent manner.

Integration of health and social care

- **84.** Legislation to implement health and social care integration, passed by the Scottish Parliament in February 2014, came into force on 1 April 2016. This brings together NHS and local council care services under one partnership arrangement for each area. Integration will mean a greater emphasis on enabling people to stay in their homes, or another homely setting, to improve their quality of life.
- **85.** The Clackmannanshire and Stirling Integration Joint Board (IJB) is provided in partnership with Stirling Council and NHS Forth Valley and became fully operational on 1 April 2016. The financial transactions of the IJB have been consolidated into the Council's group financial statements.
- **86.** The Council was required to make an additional contribution to the IJB of £0.685 million in 2016/17 in order for the IJB to achieve a breakeven position.
- **87.** The IJB approved the partnership's three year strategic plan in February 2016. The Council delegated adult social care services to the IJB. The plan acknowledges that service redesign is required to meet future demand. The Clackmannanshire and Stirling partnership area has been divided into three localities designed to support collaborative working across primary and secondary health care, social care and third and independent sectors.
- 88. It is too early for the Council or its partners to demonstrate any significant examples of new ways of working that promote integration or have resulted in improvements to services. Audit Scotland, as part of a series of reports, will be reporting on integration authorities' progress after the first year of IJBs being established. This is due in spring 2018. We plan to use the findings of this work to assess progress.

Local scrutiny plan

89. The 2017/18 Clackmannanshire Council Local Scrutiny Plan (LSP), prepared by the Local Area Network (LAN) of scrutiny partners, was submitted to the Council in May 2017. It was presented to the Audit and Finance Committee in September 2017. The LAN did not identify any new scrutiny risks requiring specific scrutiny work during 2017/18. The Council will be subject to a range of nationally driven scrutiny activity as set out in the LSP.

Equalities

- **90.** The Equality Act 2010 introduced a public sector general duty that encourages public bodies to mainstream equality by ensuring it is part of their core work. The Act requires that by no later than 30 April 2015, and every two years thereafter, public bodies must publish a report on the progress made to achieve their equality outcomes.
- **91.** We reviewed the Council's Mainstreaming Equality and Diversity in Clackmannanshire 2017-2021 report and concluded the Council has met its statutory duty to:
 - publish information on progress made in mainstreaming equality within the Council
 - report on progress made towards achieving equality outcomes published in 2013

- publish annual employee information and details of the progress made in gathering and using information to better meet the duty
- publish updated gender pay gap information.
- **92.** We concluded, on the basis of evidence reviewed, that the Council is proactive in ensuring that equality is mainstreamed.
- **93.** In September 2017, the Accounts Commission published its findings from an audit of equal pay across local government. The audit found that councils under-estimated the challenges involved in implementing the Single Status Agreement and some of the approaches taken by councils did not always prioritise pay equality and were later found to be discriminatory. Clackmannanshire Council implemented single status in March 2010 and reports that between 2004/05 and 2015/16 it has spent £4.2 million compensating workers who had been unfairly paid and settling equal pay claims.
- **94.** Almost 27,000 equal pay claims across Scotland remain live and Clackmannanshire Council has 58 live claims. Workers could potentially still make new claims against councils. This means that councils need to be confident that they have fair and transparent pay arrangements and take necessary action, such as regular equal pay audits, to deliver pay equality in line with their public sector equality duty.
- **95.** The Council anticipates that its remaining equal pay claims will be concluded by March 2018.

Part 5 Value for money



Main judgements

The Best Value Assurance Report for Clackmannanshire Council will be considered by the Accounts Commission early in 2018.

The Council's arrangements for the publication of statutory performance indicators are satisfactory.

Best Value

- **96.** The Accounts Commission agreed the overall framework for a new approach to auditing Best Value in June 2016. Best Value will be assessed over the five year audit appointment, as part of the annual audit work. In addition a Best Value Assurance Report (BVAR) for each council will be considered by the Accounts Commission at least once in this five year period.
- **97.** The Best Value audit work at Clackmannanshire Council is underway and the BVAR will be considered by the Accounts Commission early in 2018.

Following the public pound

- **98.** Local authorities have a statutory responsibility to comply with the Accounts Commission / COSLA Code of Guidance on funding external bodies and following the public pound.
- **99.** The Council's financial regulations contain a specific section on following the public pound. These emphasise that services must adhere to the Council's guidance for allocating funds to external organisations.
- **100.** We concluded that the Council has appropriate arrangements for ensuring compliance with the Code of Guidance on funding external bodies and following the public pound.

Statutory performance indicators (SPIs)

101. The Accounts Commission places great emphasis on councils' responsibility for public performance reporting. The Commission does not prescribe how councils should report this information but expects them to provide the public with fair, balanced and engaging performance information.

102. For 2016/17 two SPIs were prescribed:

 SPI 1: covering a range of information relating to areas of performance such as improving local public services, improving local outcomes, engaging with communities and achieving Best Value Value for money is concerned with using resources effectively and continually improving services.

- SPI 2: relates to the reporting of performance information as required by the Local Government Benchmarking Framework.
- **103.** Overall, we concluded that the Council's arrangements for publication are satisfactory.

National performance audit reports

- 104. We carry out a national performance audit programme on behalf of the Accounts Commission and the Auditor General for Scotland. During 2016/17, a number of reports were issued which are of direct interest to the Council. These are outlined in <u>Appendix 3</u>.
- **105.** The Council and the Audit and Finance Committee periodically consider the findings of relevant Audit Scotland reports.

Appendix 1 Action plan 2016/17

2016/17 recommendations for improvement

turn could adversely afffect

achievement of the Council's

service delivery and the

Page no.	lssue/risk	Recommendation	Agreed management action/timing
10	 1. Accuracy of asset register During our audit testing we noted differences between the revaluation reserve values recorded in the Council's fixed asset register and the corresponding values recorded in its financial ledger. The individual differences are not material and the net book values for each category of asset have been correctly recorded in the financial statements. It is important that the Council maintains an accurate record of its assets to ensure it correctly accounts for these in future years. Risk 	The Council should review its fixed asset register and take corrective action to ensure individual asset values are accurately recorded.	Agreed. The asset register is reconciled annually and this will continue to be done at least annually. The differences referred to arose at the time of the migration from a spreadsheet asset register to the Real Asset Management System in 2013. Responsible officer: Chief Accountant
	accounted for in future financial statements.		
13	2. Capital programme There was significant underspending in the Council's capital programme of £11.107 million (52%). This continues the trend of capital underspends in recent years. Risk Recurring underspending could lead to slippage in the capital programme which in ture could adversely affect	The Council should review its arrangements for managing the capital programme to ensure they are effective.	Agreed. This has been reported to Council and Committee on a number of occasions. Significant work has been undertaken over a number of years to reprofile planned project spend in line with the planned activity. However, further progress is needed to improve on the current situation. Options have been considered as part of budget deliberations to restrict

eleste

deliberations to restrict

take planned revenue

capital project activity and

26 |

Page no.	lssue/risk	Recommendation	Agreed management action/timing
	strategic priorities.		savings from the consequential reduction in loan charges.
			Responsible officer: Executive Director
14-15	3. National Fraud Initiative	The Council should work to	Agreed. An approach has
	The Council has made limited progress in investigating NFI matches	complete its review of priority NFI matches and ensure it identifies suitable resource to	been agreed and this is being progressed during Quarter 3 of 2017/18.
	with only 2% of matches reviewed as of August 2017.	carry out this work.	The Council has made a commitment to completing the review of the NFI
	Risk		matches by February 2018.
fraudulent activity or erro	The Council does not identify fraudulent activity or errors resulting in financial loss.		Responsible officer: Head of Resources and Governance
16-17	4. Financial planning	5	Agreed. Work is in hand to
	The Council's budget strategy is aligned with the aims of its change programme, Making Clackmannanshire Better. Further work is required to ensure there is a clearer link between all budget decisions and the priorities outlined in		present the new Corporate Plan linked to the Local Outcome Improvement Plan to Council in November 2017.
			Financial plans will be reviewed to ensure they remain aligned with the delivery of the stated
	the Council's corporate plan. The Council is planning to work to ensure savings plans and financial projections reflect the objectives, priorities and structures required to ensure achievement of its ambitions. This is an important exercise, particularly as the Council is refreshing its corporate plan, Taking Clackmannanshire Forward.		corporate priorities. Responsible officer: Depute Chief Executive (Section 95 Officer)
	Risk		
	Budget decisions do support the Council's priorities.		
18-19	5. Savings plans	The Council should work to develop savings plans to address funding gaps. This should include identification of the savings it expects to achieve from its new strategic model.	Agreed. The Council has a
	The Council has identified substantial funding gaps in each of the next three years. It has recognised that it cannot continue to use		continuous cycle of review to identify potential savings from efficiencies, policy change and redesign activities. This will continue.
	reserves to meet budget gaps. The Council plans to		Work to develop the corporate redesign is





Recommendation



Agreed management action/timing

progressing and any savings identified will contribute towards closing future years' forecast funding gap.

Responsible officer: Chief Executive/ Depute Chief Executive

Page no. Issue/risk make significant savings

from a new strategic model. It has yet to identify the savings achievable from redesigning how it delivers services.

Risk

The Council is unable to deliver priority services.

Appendix 2

Significant audit risks identified during planning

The table below sets out the audit risks we identified during our planning of the audit and how we addressed each risk in arriving at our opinion on the financial statements.

Audit risk	Assurance procedure	Results and conclusions

Risks of material misstatement in the financial statements

1	Risk of management override of controls	Detailed testing of journal entries.	We tested journal entries, accruals and prepayments and
	ISA 240 requires that audit work is planned to consider the	Focused testing of accruals and prepayments.	found no material errors.
	risk of fraud, which is presumed to be a significant risk in any audit. This includes the risk of management override of controls in order to change the	Review of significant management estimates and evaluation of the impact of any variability in key assumptions.	
	position disclosed in the financial statements.	Evaluation of significant transactions that are outside the normal course of business.	
2	Risk of fraud over income The council receives around	Audit work on the National Fraud Initiative (NFI) matches.	We found limited investigation work on NFI matches had been
	£22m from Council Tax, £23m from housing income and	Confirmation of property and housing numbers and	carried out. See Appendix 1, point 3.
	another £22m from other fees and charges. The extent and	bandings to independent sources.	We confirmed property and housing numbers.
	complexity of income means that, in accordance with ISA240, there is an inherent	Analytical procedures on income streams.	Our analytical procedures and detailed testing found no material
	risk of fraud that requires an audit response.	Detailed testing of revenue transactions focusing on the areas of greatest risk.	errors or fraud.
3	Risk of fraud over expenditure	Audit work on the NFI matches.	We found limited investigation work on NFI matches had been
	Practice Note 10: Audit of financial statements of public	Specific audit work on benefits and grants.	carried out. See Appendix 1, point 3.
	sector bodies in the United Kingdom and the Code of Audit Practice require consideration of fraud over expenditure (excluding payroll costs which are already a core part of annual audits). The council	Ind the Code of Audit quire consideration er expenditure payroll costs which a core part ofEvaluation of the effectiveness of internal controls for expenditure recognition and recording.thImage: Construction of the effectiveness of internal controls for expenditure recognition and recording.th	We have audited and signed off the education maintenance allowance and criminal justice grant claims. Our audits of the non domestic rates return and housing benefits subsidy claim are ongoing.
	incurs significant expenditure on benefits and grants which require audit coverage.		We tested controls on expenditure recognition and recording and found no significant issues.

A	udit risk	Assurance procedure	Results and conclusions	
4	Estimation and judgements There is a degree of subjectivity in the measurement and valuation of the material account areas of non current assets, provisions and pension liabilities. This subjectivity represents an increased risk of misstatement in the financial statements.	Completion of 'review of the work of an expert' for the professional valuer. Focused substantive testing of non current assets.	We reviewed the work of the Council's valuer and the actuary and found no issues. We found no significant issues	
		Review of the work of the actuary and the pension assumptions used.	from our substantive testing of non current assets.	
5	Consolidation of Health and Social Care costs: Integration Joint Board (IJB)	Consider the timetable and process for consolidation of the group accounts.	We reviewed the timetable, S95 assurances, consolidation adjustment and IJB related balances and found no significant issues.	
	The IJB transactions will be consolidated into the accounts of the council for the first time in 2016/17.	Consider the assurances obtained by the council's S95 officer for the group governance disclosures.		
	The council needs to agree a timetable and approach to obtaining the IJB figures for	Agree the consolidation adjustment is accurate and correctly disclosed.		
	consolidation, and assurances required for the group governance disclosures. As this is the first year, there is a risk that the timetable may not be achieved. There is also an increased risk of errors in accuracy and disclosure.	Confirm that any balances relating to IJBs have been agreed by the partner bodies.		
6	Implementation of new financial ledger system	Review of internal audit's work on the project's progress.	We reviewed internal audit's work, carried out walk through and controls testing of reconciliations and journals, and substantively tested opening balances, ledger transactions and balances. We found no significant errors.	
	The council is implementing the new system during 2016/17 to replace its existing system. The	Walk through testing of the ledger and controls testing of reconciliations and journals.		
	opening balances were journaled into the new system in December 2016.	Focussed substantive testing on opening balances.		
	There is a risk that the information from the new system used to prepare the financial statements may contain errors.	Substantive testing of ledger transactions and balances through the audit work on income, expenditure and balance sheet items.		

Risks identified from the auditor's wider responsibility under the Code of Audit Practice

7 Financial sustainability

The council's 2016/17 Financial Plan identified a budget gap of \pounds 7.5m to be addressed by efficiency measures. The November 2016 financial monitoring report highlighted that this gap had reduced to \pounds 2.5m, with almost 50% of the gap in social services. Review financial monitoring reports and the financial position.

Undertake specific audit work on financial planning and governance. This will include assessing the robustness of longer term financial planning.

82

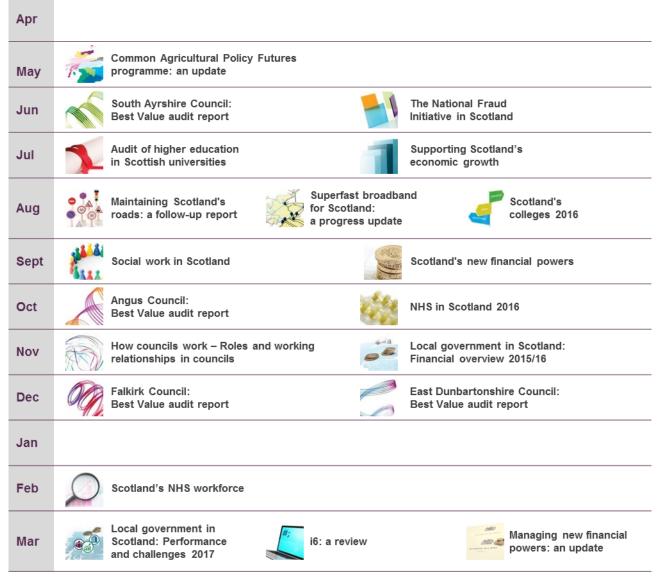
Our conclusions on the Council's financial sustainability are reported in part 3 of this report.

Audit risk		Assurance procedure	Results and conclusions
	Delivering recurring efficiency savings is increasingly challenging and represents a risk to the financial sustainability of the council.		
8	Transformation of services The Local Area Network reported in 2016 that the council's transformation programme has been slower than anticipated and was not sufficient to meet the objectives, financial challenges and reestablishment of stand alone education and social work services. It concluded that Best Value audit work is required on the council's leadership, governance and financial sustainability.	A Best Value Assurance Report will be published in early 2018.	Best Value audit work is underway. The Council's Best Value Assurance Report will be discussed by the Accounts Commission early 2018.
9	Members Council elections are to be held in May 2017 and there are indications that a number of elected members are or may be standing down. This will represent a loss of skills experience amongst members. To ensure members fully understand their roles and have the necessary skills to make informed decisions and provide effective scrutiny, appropriate development and training will be required.	Monitor the council's arrangements for developing members and preparations for inducting newly elected members.	We reviewed the induction training and materials provided to members and concluded it was fit for purpose. We participated in one of the induction training sessions.

Appendix 3

Summary of national performance reports 2016/17





Local government relevant reports

The National Fraud Initiative in Scotland - June 2016

Social work in Scotland - September 2016

How councils work - Roles and working relationships in councils - November 2016

Local government in Scotland: Financial overview 2015/16 - November 2016

Local government in Scotland: Performance and challenges 2017 - March 2017

84

32 |

Clackmannanshire Council Draft 2016/17 Annual Audit Report

If you require this publication in an alternative format and/or language, please contact us to discuss your needs: 0131 625 1500 or info@audit-scotland.gov.uk

For the latest news, reports and updates, follow us on:





Audit Scotland, 4th Floor, 102 West Port, Edinburgh EH3 9DN T: 0131 625 1500 E: info@audit-scotland.gov.uk www.audit-scotland.gov.uk

85