

Annual Regulatory Compliance and Quality Report

PricewaterhouseCoopers LLP June 2015
Audit 2014/15

Public Sector Audit Appointments Limited (PSAA) is an independent company limited by guarantee incorporated by the Local Government Association in August 2014.

The Secretary of State for Communities and Local Government delegated statutory functions (from the Audit Commission Act 1998) to PSAA by way of a letter of delegation issued under powers contained in the Local Audit and Accountability Act 2014.

The company is responsible for appointing auditors to local government, police and local NHS bodies, for setting audit fees and for making arrangements for the certification of housing benefit subsidy claims.

Before 1 April 2015, these responsibilities were discharged by the Audit Commission.

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Summary report

Introduction

- 1 Public Sector Audit Appointments Limited (PSAA) monitors the performance of all its audit firms. The results of our monitoring provide audited bodies and other stakeholders with assurance that auditors within our regime are delivering high-quality audits.
- 2 There are two strands to our monitoring:
 - audit quality- applying our annual quality review programme (QRP) to the audit work undertaken for the year ending 2013/14; and
 - regulatory compliance- reporting quarterly on audit firms' compliance with our 2014/15 regulatory requirements as set out in the Terms of Appointment.
- 3 The audit quality and regulatory compliance monitoring for 2014/15 incorporated a range of measurements and checks comprising:
 - a review of each firm's latest published annual transparency reports;
 - the results of reviewing a sample of each firm's audit quality monitoring reviews (QMRs) of its financial statements, Value for Money (VFM) conclusions, Whole of Government Accounts (WGA) and housing benefit (HB COUNT) work. Our review included assessing compliance with the HB COUNT guidance;
 - an assessment as to whether we could rely on the results of each firm's systems for quality control and monitoring^{II};
 - a review of the Financial Reporting Council's (FRC) published report on the results of its inspection of firm audits in the private sector;
 - the results of our inspection of each firm by the FRC's Audit Quality Review team (AQR) as part of our commissioned rolling inspection programme of financial statements and VFM work;
 - the results of each firm's compliance with 17 key indicators relating to Terms of Appointment requirements!
 - a review of each firms' systems to ensure they comply with our regulatory requirements^{IV};
 - a review of each firm's client satisfaction surveys for 2013/14 work.
- 4 This report summarises the results of our monitoring work for PricewaterhouseCoopers LLP (PwC).

I Previously these requirements were set out in the Standing Guidance for Auditors issued by the Audit Commission.

II These assessments were undertaken by the Audit Commission prior to 1 April 2015.

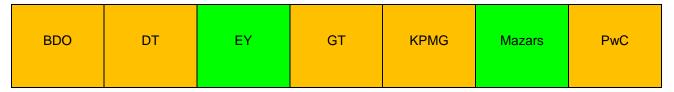
III Results of compliance against the 17 indicators were published by the Audit Commission prior to 1 April 2015.

IV These assessments were undertaken by the Audit Commission prior to 1 April 2015.

Overall performance

5 The firm is meeting our standards for overall audit quality and our regulatory compliance requirements. We calculated the red, amber, green (RAG) indicator for overall audit quality and regulatory compliance using the principles detailed in Appendices 1 and 2. For 2014/15, PwC's combined audit quality and regulatory compliance rating was amber.

Figure 1: **2015 Comparative performance for audit quality and regulatory compliance**



- 6 The firm performance against the regulatory compliance indicators has deteriorated since last year, with only 11 of the 17 2014/15 indicators scored as green. In addition, the firm's overall weighted audit quality score has decreased from last year.
- 7 However, the satisfaction survey results show that audited bodies are satisfied with the performance of PwC as their auditor.

Detailed report

Quality review programme

FRC Inspection

- **8** Every year each firm provides a self-assessment in the form of a statutory transparency report. Our review of the PwC transparency report did not highlight any significant issues of note.
- 9 Annually, the FRC publishes reports on the audit firms subject to full scope FRC inspections (including firms in our regime), as well as an overall annual report. We place reliance on the work of the FRC, which reviews the firms' systems and processes for ensuring audit quality and reviews a sample of their audits of public interest entities. In its latest public report (May 2015) on the firm, the FRC concluded that audit procedures were performed to a good or acceptable standard for 20 of the audit engagements reviewed, with two audits requiring significant improvement.
- 10 In addition, the FRC produces an annual overview report on the profession based on its audit quality inspection activities in the year. The FRC's overall conclusion in this report was that '...the 2014/15 inspection results are consistent with our overall judgment that audit quality is improving.' (FRC Annual Report 2014/15, 29 May 2015).
- 11 The FRC have identified key issues in its annual report which, profession wide, should be addressed in order to improve audit quality. These were:
- a need for auditors to improve their scepticism in challenging the appropriateness of assumptions in key areas of audit judgment such as impairment testing and property valuation;
- a need for an improvement in the sufficiency and appropriateness of audit procedures being performed. This is common to many audit areas including revenue recognition; and
- a need to adequately identify the threats and related safeguards to auditor independence and to appropriately communicate these to audit committees.
- 12 We have raised these issues with PwC and with all other firms in our regime; and we will continue to monitor progress in these areas.
- 13 We also commissioned inspections of all firms by the FRC for this year's QRP. The AQR inspected one 2013/14 audit file and one VFM conclusion file from PwC's PSAA work and did an updated commentary on the applicability of firm-wide procedures to our audits. Having considered the review points raised by the AQR, we assessed the audits inspected as acceptable with limited improvements required for the financial statements audit and as improvements required which are individually or collectively significant for the VFM conclusion work.
- 14 The improvement points raised by the AQR, from across the firms, following this year's programme of work for PSAA were:
- a continuing need to review, challenge and consider the reasonableness of management's
 documents and assumptions with respect to evidence obtained for the VFM conclusion,
 particularly in relation to increasing funding gaps at local government organisations; and in
 relation to the consideration of savings plans, the levels of reserves and budgetary controls;
- a need to clearly justify and document materiality considerations and not default automatically to the top of the materiality range;
- a need to consider property valuations as significant risk areas, particularly to ensure that when
 using external valuers in this respect they review and challenge management valuations. In
 addition, audit teams needs to verify the completeness and accuracy of source data used by

- experts and to evidence the consideration of ensuring that assets are revalued on the appropriate cycle in accordance with accounting policies; and
- a need to evidence journals selected for testing by audit teams, while improving procedures to
 ensure the completeness of the population of journals considered for testing and following up
 on any identified control weaknesses.
- 15 We have combined our scores for the AQR inspections for PSAA with the firm's QMR scores in the relevant sections in the rest of this report. These improvement points are included in Appendix 4

QMR programme

- 16 PSAA sets quality standards for its appointed auditors and monitors their performance against them. The principal means of monitoring and evaluating the quality of auditors' work is the annual QRP. For 2014/15 we relied on each firm's own quality monitoring arrangements.
- 17 All firms agreed to follow PSAA's methodology and reporting format for their QMRs for WGA returns, VFM conclusions and HB COUNT audit work and use their own methodology for assessing work on the financial statements (converting the financial statements results to our scoring system). We concluded that PwC's QMRs were sufficiently detailed and rigorous for us to place reliance on all of the reviews provided by the firm.
- 18 Each firm scored their QMRs using a common four-point scale, with 3 being the highest and 0 being the lowest. A score of 1 is our benchmark for acceptable performance. The full assessment scale is detailed in Table 1 and we calculated the score for overall audit quality on a weighted assessment using the weightings detailed in appendix 1.

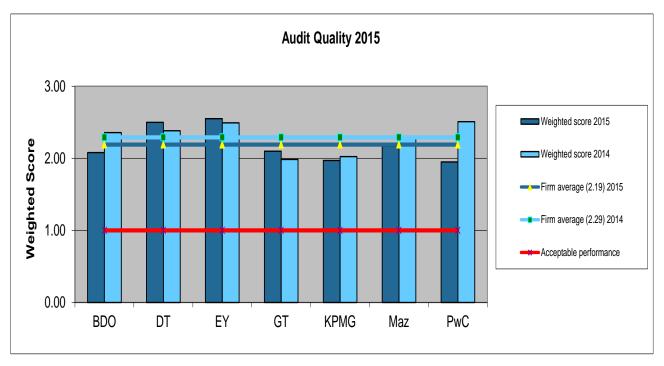
Table 1- PSAA assessment scale

Score	Descriptor
3	Good, no improvement required
2	Acceptable with limited improvements required
1	Acceptable overall with improvements required
0	Improvements required which are individually or collectively significant

- 19 PwC's score was 1.95, compared to an all firm average of 2.19. This was a reduction on last year's score of 2.51, although this year we used a slightly amended scoring base. The drop in score relates to the performance of one engagement team. The firm has taken significant actions in respect of this weakness.
- 20 Figure 2 shows the assessment of PwC's overall audit quality performance in comparison to other firms.

I The prior year assessment included consideration of Health Quality Accounts and Certification work which are not included in the current year assessment.

Figure 2: **2015 Comparative performance for audit quality**



- 21 Our QRP methodology is designed to highlight any specific weaknesses at individual file level, specifically where our benchmark score of 1 is not met, which may have ordinarily been masked behind a high average score across the various elements (Financial statements, VFM, WGA and HB COUNT) of the QRP.
- We have calculated a red, amber, green (RAG) indicator for each element of the QRP, using the principles detailed in Appendix 2, as well as for overall audit quality. Where a firm scores an average of less than 2, or has any scores of 0, a rating higher than amber in that element is not possible.
- 23 For 2014/15, PwC's overall rating for audit quality was amber. We consider each of the individual elements making up this rating below.

Figure 3: **2015 Comparative performance for audit quality**

BDO	DT	EY	GT	KPMG	Mazars	PwC

Financial statements audit work

- 24 The firm provided the results of four QMRs for financial statement audit files. We reviewed these and agreed with all the firm assessments. In addition, the AQR review for PSAA provided a score for one additional financial statements assessment.
- 25 The improvement areas from these individual QMRs and the AQR review included:
- ensuring sufficient audit procedures are performed and documented on file in relation to valuations of property, plant and equipment;
- ensuring that the completeness assertion is addressed when auditing journals in an environment where there is no ITGC comfort; and
- ensuring there is sufficient documentation on file to support audit judgements.
- 26 Figure 4 shows the comparative performance for financial statement audit work based on the results of the QMRs and AQR review. PwC's average score was 2.00 compared to an all firm average of 2.07.

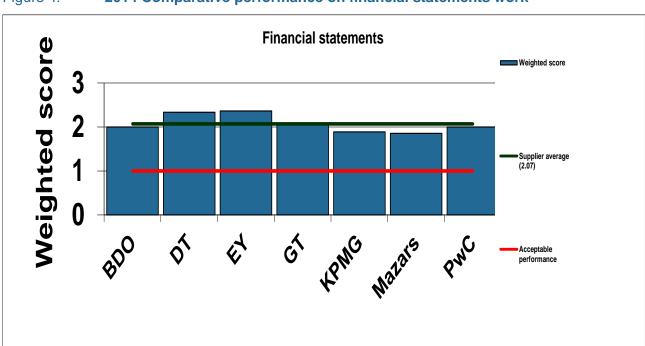


Figure 4: **2014 Comparative performance on financial statements work**

27 For 2014/15, PwC's rating for financial statements work was amber because one score of 0 was awarded to a file.

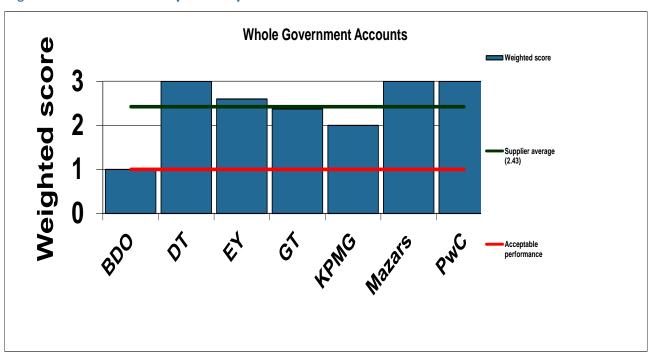
Figure 5: **2015 Comparative performance for financial statements audit work**

BDO	DT	EY	GT	KPMG	Mazars	PwC
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Whole of government accounts returns

- 28 The firm provided the results of two QMRs for WGA returns. We reviewed these and agreed with both of the assessments.
- 29 Figure 6 shows the comparative performance for WGA return audit work based on the results of the QMRs. PwC's average score was 3.00 compared to an all firm average of 2.43.

Figure 6: **2015 Comparative performance on WGA work**



30 For 2014/15, PwC's rating was green for WGA work.

Figure 7: **2015 Comparative performance for WGA work**

BDO	DT	EY	GT	KPMG	Mazars	PwC

VFM conclusion audit work

- 31 The firm provided the results of three QMRs for VFM conclusion audit files. We reviewed the results and agreed with two of the three assessments. In one case, we scored the assessment lower by one grade, from a 2 to a 1. This was because of the improvement needs, specifically around the timeliness of engagement lead review of work undertaken, were identified by the reviewer.
- **32** In addition, the AQR review for PSAA provided a score for one additional VFM conclusion assessment.
- 33 The improvement areas from these individual QMRs and the AQR review included:
- ensuring timely review of work by the engagement lead; and
- ensuring that consideration for VFM is focused on arrangements that were in place during the year without placing too much reliance on actions taken by management after year end.
- 34 Figure 8 shows the comparative performance for VFM audit work based on the results of the QMRs and AQR review. PwC's score was 1.75 compared to an all firm average of 2.31.

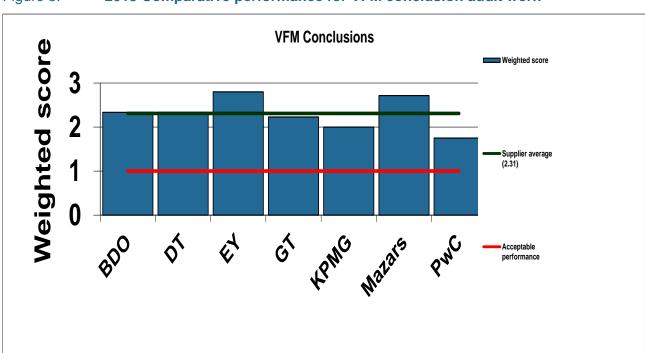


Figure 8: 2015 Comparative performance for VFM conclusion audit work

35 For 2014/15, PwC's rating was amber because one score of 0 was awarded to a file review and because of the relatively low score (average less than 2), on VFM conclusion work.

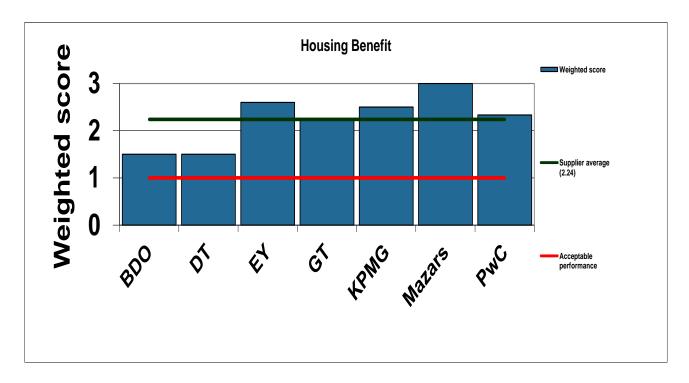
Figure 9: **2015 Comparative performance for VFM conclusion audit work**

BDO DT	EY	GT	KPMG	Mazars	PwC
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Housing benefit work

- 36 Each year auditors certify local authority claims for housing benefit subsidy to the Department for Work and Pensions (DWP). They are required to undertake this work using specific guidance and tools (HB COUNT) which are agreed annually with the DWP. HB COUNT sets out the approach and work needed to certify the subsidy claim form. It includes a requirement to test a sample of cases to check that benefits have been awarded in accordance with benefit regulations and that subsidy has been properly claimed.
- 37 The firm provided the results of three QMRs for HB COUNT audit work. We reviewed the results of these and we agreed with all of the firm's assessments.
- 38 The improvement areas from these individual QMRs included:
- ensuring compliance with the certification instructions on housing benefit work, particularly around clearly documenting on file all testing undertaken.
- 39 Figure 10 shows the comparative performance of each firm based on the QMRs. PwC's average score was 2.33 compared to an all firm average of 2.24.

Figure 10: **2015 Comparative performance for HB COUNT audit work**



40 For 2014/15, PwC's rating was green for HB COUNT audit work.

Figure 11: **2015 Comparative performance for HB COUNT audit work**

BDO	DT	EY	GT	KPMG	Mazars	PwC
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Regulatory compliance

Systems for compliance with our regulatory requirements

- 41 In 2013/14 the Audit Commission (the Commission) reviewed the systems and procedures at PwC for ensuring compliance with our regulatory requirements. The Commission's conclusion was that it could place reliance on the firm's systems and procedures for monitoring compliance with its regulatory requirements.
- 42 For the 2014/15 review, PwC confirmed to the Commission that the systems and procedures for regulatory compliance and information assurance arrangements were the same as those in the previous year. Nothing came to the Commission's attention in year to suggest this is not correct, and it concluded that it could continue to rely on PwC's systems. We have placed reliance on the work undertaken by the Commission for this assessment.

Quarterly monitoring of our regulatory requirements

43 The Commission reported the details in the quarterly monitoring reports issued to the firm during the year, including fee variation request and requests for non-audit services from the firm. Figure 12 details the firm's overall regulatory compliance RAG rating compared to other firms as report by the Commission.

Figure 12: **2015 Comparative performance for regulatory compliance**



- The firm has not performed well across all of the regulatory compliance requirements, with only 11 of the 17 indicators being rated as green. The firm must act to ensure that compliance requirements are met next year, the last year of the firm's contract with PSAA.
- 45 We have included a summary at Appendix 3 of the results of the 2014/15 regulatory compliance monitoring RAG ratings, comparing the firm's performance against the overall performance for all firms.

Client satisfaction surveys

- 46 All firms agreed to undertake client satisfaction surveys for 2013/14 audits, and to report the results to PSAA. We specified questions to be included in the survey and asked firms to provide us with an analysis of the results.
- 47 The firm received results from a sample of audited bodies (33% of its portfolio of audits) on completion of their 2013/14 audit. Table 1 details the questions and the average score.

Table 1- Satisfaction survey results

Question	Average score (max. 10)
How satisfied are you overall with your audit?	8.7
How satisfied are you with the amount of contact with your Engagement Lead?	8.8
How satisfied are you with the amount of contact with your Audit Manager?	8.9
How satisfied are you with the technical competence and skills of your audit team?	8.5
How satisfied are you with your auditor's performance at committee meetings?	9.2
How satisfied are you with your auditor's understanding of the key issues and risks specific to your organisation?	8.7
How satisfied are you with the usefulness of your auditor's reports?	8.6
How satisfied are you with the timeliness of your auditor's reports?	8.6

These results show that audited bodies are satisfied with the level of service received from PwC and for 2014/15, PwC's rating for client satisfaction was green.

Figure 13: **2015 Comparative performance for client satisfaction**

		BDO	DT	EY	GT	KPMG	Mazars	PwC
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49 The firm has undertaken an analysis of any improvements points raised in the survey and has committed to action any individual improvement points identified.

Recommendations

Recommendations arising from the 2014/15 quality review programme

50 The key areas for improvement identified this year from file reviews are noted below, as taken from the body of this report:

Financial statements

- ensuring sufficient audit procedures are performed and documented on file in relation to valuations of property, plant and equipment;
- ensuring that the completeness assertion is addressed when auditing journals in an environment where there is no ITGC comfort; and
- ensuring there is sufficient documentation on file to support audit judgements.

VFM

- ensuring timely review of work by the engagement lead; and
- ensuring that consideration for VFM is focused on arrangements that were in place during the year without placing too much reliance on actions taken by management after year end.

HB

- ensuring compliance with the certification instructions on housing benefit work, particularly around clearly documenting on file all testing undertaken.
- 51 Appendix 4 provides details of the actions the firm has, or intends to take to address these improvement areas. We understand the findings from the QMR will be considered by the firm's top management team and then communicated to staff.

Appendix 1 – Weightings to calculate overall quality score

Table 2- weightings

Audit element	Local government	NHS
	%	%
Financial statements	60	70
WGA	5	<u>-</u>
VFM Conclusions	25	30
НВ	10	_
Total	100	100

Appendix 2 - Audit quality and regulatory compliance RAG rating

Table 3- QRP elements of financial statements, VFM conclusions, WGA assessments, health quality accounts, certification instructions and housing benefit work.

Rating	Firm level: Overall Audit Quality score	Firm level: Individual QRP element
Green	Firm audit quality score ≥2 and no scores of '0' at file review level	Average element score ≥2 and no scores of '0' at file review level
Amber	Firm audit quality score ≥1 with up to two scores of '0' at file review level	Average element score ≥1 with up to one score of '0' at file review level
Red	Firm audit quality score <1, or Firm audit quality score ≥1 but three or more scores of '0' at file review level	Average element score <1, or Average element score ≥1 but two or more scores of '0' at file review level

Table 4- Regulatory compliance RAG rating based on 17 quarterly monitoring indicators

Rating	Overall firm level score- indicators
Green	12 or more at green and no more than two at red.
Red	Six or more indicators at red.
Amber	Neither green nor red.

Table 5- Combined audit quality and regulatory compliance RAG

		QRP RAG		
		Red	Amber	Green
Regulatory compliance RAG	Red	R	R	А
	Amber	R	А	A
	Green	Α	A	G

Table 6- RAG rating the results of satisfaction survey results

Firm 0-10 assessment (average)	Firm unsatisfactory – satisfactory assessment (average)	PSAA RAG rating
0-3	very dissatisfied / dissatisfied / unsatisfactory	R
4-6	reasonable / good / satisfied	А
7-10	very good / very satisfied / outstanding	G

Appendix 3 - Results of 2014/15 regulatory compliance monitoring

Activity	Target	All firms % (no).	PwC % (no).	Red, amber, green (RAG) status
Number of planning letters issued – all sectors.	100% issued by 30 April 2014 (all sectors).	95.8 (34)	48.4 (33)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of audit opinions issued – NHS.	100% issued by 6 June 2014 (CCG) and 9 June 2014 (NHS Trusts).	100	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of VFM conclusions issued – NHS.	100% issued by 6 June 2014 (CCG) and 9 June 2014 (NHS Trusts).	100	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Confirmation of final fee reported to audited body – NHS.	100% by 31 July 2014.	100	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of annual audit letters issued – NHS.	100% by 31 July 2014.	100	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of audit opinions issued– local government.	100% issued by 30 September 2014.	98.2 (9)	94.1	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of VFM conclusions issued - local government.	100% issued by 30 September 2014.	97.9 (11)	94.1	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of WGA returns issued.	100% issued by 3 October 2014.	96.4 (16)	90.0 (3)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.

Activity	Target	All firms % (no).	PwC % (no).	Red, amber, green (RAG) status
Confirmation of final fee reported to audited body – local government.	100% by 31 October 2014.	98.6 (7)	90.9	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of annual audit letters issued - local government.	100% by 31 October 2014.	99.0 (5)	97.0 (1)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Number of certified claims and returns.	100% submitted by the relevant deadlines.	98.3 (9)	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Submission of data returns to the Commission by the required deadline.	100% submitted by the relevant deadlines.	97.7 (105)	80.1 (69)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Assessment of the quality of the submitted data returns.	Quality and accuracy of submitted data returns.	97.8 (100)	97.8 (8)	G >95.01% or 1 not at required quality level. A 90.01 - 95.00% or 2 not at required quality level. R <90.00% or 3 not at required quality level.
Number of complaints upheld against auditors.	No complaints upheld against auditors.	1	0	G = 0 upheld A = 1 R = 2 or more
Instances of non-compliance with standing guidance requirements on independence issues.	No instances of non-compliance with standing guidance.	1	0	Firm G = up to 1 A = 2 R = 3 or more Regime G = up to 7 A = 8 R = 9 or more.

Activity	Target	All firms % (no).	PwC % (no).	Red, amber, green (RAG) status
Objections decided upon within nine months.	100% of objections decided upon within nine months.	11	1	Firm G = up to 1 A = 2 R = 3 or more Regime G = up to 7 A = 8 R = 9 or more.
Attendance of Contact Partners (or appropriate representative) at Auditors' Group, Auditors' Group sub groups/technical groups.	No meetings missed.	2	0	Firm G = up to 2 A = 3 R = 4 or more Regime G = up to 7 A = 8 R = 9 or more.

Appendix 4 - Summary of regulatory compliance and QRP improvement areas

Table 8- improvement areas

Area	Improvement required	Firm response
Profession wide FRC annual report	A need for auditors to improve their scepticism in challenging the appropriateness of assumptions in key areas of audit judgment such as impairment testing and property valuation. A need for an improvement in the sufficiency and appropriateness of audit procedures being performed. This is common to many audit areas including revenue recognition; and A need to adequately identify the threats and related safeguards to auditor independence and to appropriately communicate these to audit committees.	We note that each of these areas for improvement apply to all firms reviewed by the FRC. Audit quality is of paramount importance and expectations of auditors continue to increase. We strive continuously to improve all aspects of audit quality, consistent with our long term objective of helping build trust in the market. We welcome the independent insight and observations and have implemented an agreed detailed action plan in response to their recommendations. Scepticism in challenging appropriateness of assumptions in key area of audit judgement: This is an area which we have focused on in recent training and guidance. Our mandatory training programmes at all levels remind engagement teams of the need to apply a professionally sceptical mind at all times. Furthermore, we have enhanced documentation templates to emphasise the requirement for engagement teams to document their challenge of assumptions and considerations in areas of key audit judgements. Sufficiency and appropriateness of audit procedures: Evaluating the appropriateness of an audit approach, and the sufficiency of audit evidence obtained is embedded into the PwC audit

		approach, documentation tools, and training programmes. We continually refine our guidance and reiterate the messages within our training programmes, which are typically delivered in Summer/Autumn each year.
		Threats and safeguards to auditor independence: This is an area which we have focussed on heavily in the last few years. Templates, supported by guidance and training together with subject matter experts who are available for consultation, are used by engagement teams to identify potential threats and appropriate safeguards to auditor independence.
		We are very mindful of the independence issues that increased audit rotation creates. Therefore in current training we are focussing on the importance of maintaining our central client records which underpin our engagement teams' independence assessments.
		During 2015 we have issued further guidance on the requirements for Audit Committee reporting, including specific independence matters.
AQR review on PSAA work (across	Review, challenge and consider the reasonableness of management's documents and assumptions with	We note that each of these areas for improvement apply to all firms reviewed by AQR.
all firms)	respect to evidence obtained for the VFM conclusion, particularly in relation to increasing funding gaps at local government organisations; and in relation to the consideration of savings plans, the levels of reserves and budgetary controls. Clearly justify and document materiality	VFM: These matters have been covered in a communication sent to the G&PS practice in relation to ECR messages on value for money conclusions.
		Materiality: We will flag this guidance to our Local Government engagement teams.
	considerations and not default automatically to the top	Property valuations: These matters were covered in a communication to the G&PS practice which

	Onsider property valuations as significant risk areas, particularly to ensure that when using external valuers in this respect they review and challenge management valuations. In addition, audit teams needs to verify the completeness and accuracy of source data used by experts and to evidence the consideration of ensuring that assets are revalued on the appropriate cycle in accordance with accounting policies. Evidence journals selected for testing by audit teams, while improving procedures to ensure the completeness of the population of journals considered	addressed financial statement ECR messages. We have also updated the audit library steps in relation to property valuations at local government bodies. Auditing completeness of journals: Guidance on the approach to obtaining ITGC comfort and what needs to be done where no comfort is available was included in a communication to the G&PS practice which covered financial statement ECR messages. In addition in the region where this issue arose a workshop was held on ITGC's.
	for testing and following up on any identified control weaknesses.	
Financial statements	The firm should ensure sufficient audit procedures are performed and documented on file in relation to valuations of property, plant and equipment.	We note the improvements required in relation to financial statement audit work relate to one engagement.
	The firm should ensure that the completeness assertion is addressed when auditing journals in an environment where there is no ITGC comfort.	Valuation of Property, Plant and Equipment: Headline messages in relation to auditing property, plant and equipment were included in our tailored Time to Learn
	The firm should ensure there is sufficient documentation on file to support audit judgements.	class room session for the G&PS practice. This subject was also covered in a communication to the G&PS practice which covered financial statement ECR messages. In addition, we have updated the library procedures for auditing property valuations at local government bodies
		Auditing completeness of journals: Guidance on the approach to obtaining ITGC comfort and what needs to be done where no comfort is available was

		included in a communication to the G&PS practice which covered financial statement ECR messages. In addition in the region where this issue arose a workshop was held on ITGC's. Documentation to support audit judgements: This matter was covered in a communication to the G&PS practice which covered financial statement
WGA	None.	
VFM conclusions	The firm should ensure timely review of work by the engagement lead The firm should ensure that consideration for VFM is focused on arrangements that were in place during the year without placing too much reliance on actions taken by management after year end.	This is a requirement built into our engagement quality control procedures. Engagement leads have been reminded of this requirement in a communication sent to the G&PS practice in relation to ECR messages on value for money conclusions. This matter has been addressed in a communication sent to the G&PS practice covering ECR messages on value for money conclusions
Housing benefit	The firm should ensure compliance with the certification instructions on housing benefit work, particularly around clearly documenting on file all testing undertaken	The need to comply with certification instructions and, in particular, ensuring clear documentation of file of all testing undertaken will be stressed in training to be delivered to staff undertaking housing benefit work in 2014/15. This training will be supplemented with busy season calls to continue to re-enforce the need to document work clearly.
Regulatory compliance	The firm must improve on its compliance with PSAA regulatory requirements next year.	We continue to proactively look at ways to improve our regulatory performance, learning from where there have been areas of non-compliance in a previous year by working with the Audit Commission/PSAA and the audited bodies to implement changes. Planning letters: During the year there was an isolated issue in relation to our compliance with the planning letter deadline, which impacted on a number

of related KPIs for the year, given their cumulative nature. The reasons that led to this were discussed with the Audit Commission and processes have since been put in place to prevent this occurring again in the future.

Late Opinions/ VFM: In undertaking our audit work we have continued to work with our audited bodies through the year to ensure that the requirements for the year end audit and risks are identified and addressed. However, there have been instances in information not being of the required quality or being delayed which has impacted our delivery of the audit. We have continued to work with audited bodies to ensure that the risks and issues are fully addressed and that the correct opinion is given.

WGA: In all three cases, delays were due to late amendments to the accounts, or delays by the audited body in producing the WGA assurance statement, for submission to us for review. We have continued to work with these bodies to ensure that the risk of this occurring in 2014/15 is reduced.

Final Fee letters: Additional costs arising from responding to matters raised with us as auditors meant we were unable to agree the final fee variations with audited bodies by the relevant deadline.

We are proactively looking at ways to continue to meet the regulatory requirements over the 2014/15 year and will work closely with PSAA to facilitate this.