

Annual Regulatory Compliance and Quality Report

KPMG LLP June 2016

Audit 2015/16

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 2014/15; and
 - regulatory compliance- reporting quarterly on audit firms' compliance with our 2015/16 regulatory requirements as set out in the Terms of Appointment.
- 3 The audit quality and regulatory compliance monitoring for 2015/16 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) conclusion 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;
 - a review of the Financial Reporting Council's (FRC) published reports on the results of its inspection of 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 15 key indicators relating to our Terms of Appointment requirements;
 - a review of each firms' systems to ensure they comply with our regulatory and information assurance requirements; and
 - a review of each firm's client satisfaction surveys for 2014/15 work.
- 4 This report summarises the results of our monitoring work for KPMG LLP.

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 2015/16, KPMG's combined audit quality and regulatory compliance rating was amber.

Figure 1: **2016 Comparative performance for audit quality and regulatory compliance**

BDO	DT	EY	GT	KPMG	Mazars	PwC
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6 The firm has maintained its performance against the regulatory compliance indicators since last year, with all but one of the 2015/16 indicators scored as amber or green. However, the firm's overall weighted audit quality score has decreased slightly from last year.

7 The satisfaction survey results show that audited bodies are satisfied with the performance of KPMG 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 KPMG 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. 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 on the firm, the FRC concluded that audit procedures were performed to a good standard or required only limited improvements for 14 of the audit engagements reviewed, that six required improvement, with two audits requiring significant improvement.

10 The FRC has identified key issues in its reports 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 some improvement in the sufficiency and appropriateness of audit procedures being performed on revenue recognition; and
- a need to report more thoroughly to audit committees.

11 We have raised these issues with KPMG and with all other firms in our regime and we will continue to monitor progress in these areas.

12 We also commissioned inspections of all firms by the FRC for this year's QRP. The AQR inspected three 2014/15 audit files and one VFM conclusion file from KPMG's PSAA work and provided an updated commentary on the applicability of firm-wide procedures to our audits. Having considered the review points raised by the AQR, we assessed two of the audits inspected as acceptable with only limited improvements required and one as having significant improvements required for the financial statements audits and as having significant improvements required for the VFM conclusion work.

13 The improvement points raised by the AQR, from across the firms, following this year's programme of work for PSAA were:

- clearly justify and document materiality considerations and not default automatically to the top of the materiality range;
- consider property valuations as significant risk areas, and particularly to ensure that when considering external valuers' work they review and challenge management assumptions. In addition, audit teams need to verify the completeness and accuracy of source data used by experts and evidence 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 for testing;
- better evidence work on asset valuations and ensure actuarial assumptions are appropriately challenged;
- ensure that VFM work covers financial resilience over an appropriate period and that the outcomes from VFM work are reporting in sufficient detail to those charged with governance.

14 In addition the AQR has noted that the firm has amended its Engagement Quality Control Review (EQCR) arrangements for PSAA work but that the policy is still out of line with other firms in our regime. The firm should reconsider this policy for PSAA work.

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 2015/16 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 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 KPMG'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

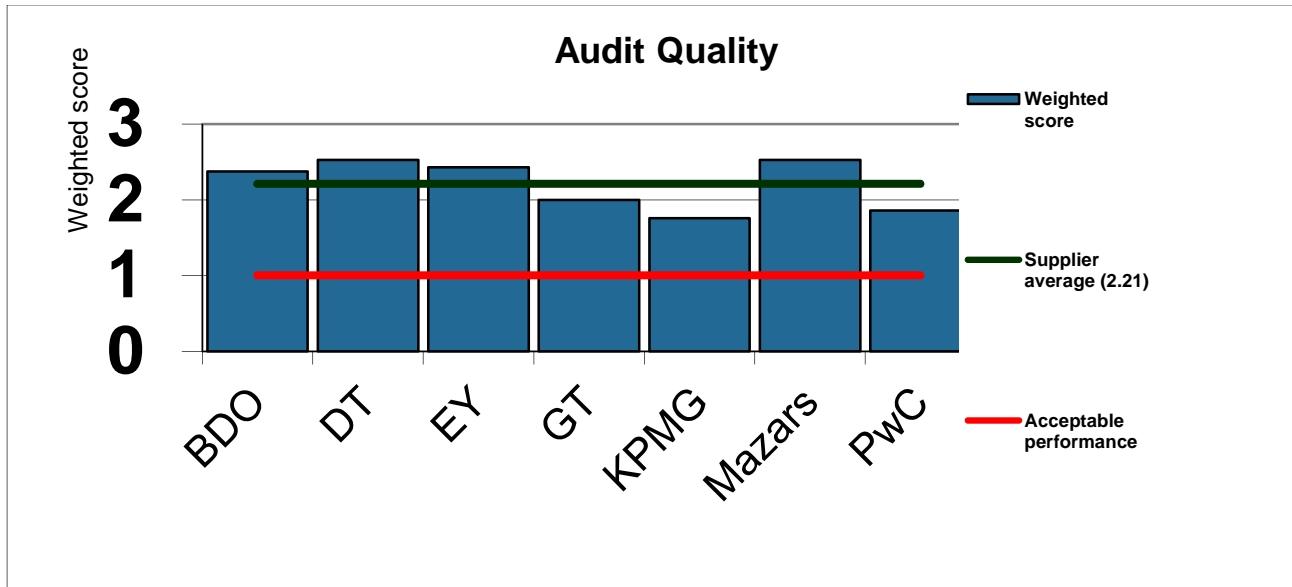
Score	Descriptor
3	Good, no improvement required
2	Acceptable with limited improvements required
1	Acceptable overall with improvements required
0	Improvements required which are individually or collectively significant

19 KPMG's score was 1.76 compared to an all firm average of 2.21. This was a reduction on last year's score of 1.97, although this year we used a slightly amended scoring base¹.

20 Figure 2 shows the assessment of KPMG's overall audit quality performance in comparison to other firms.

¹ The prior year assessment included consideration of Whole of Government Accounts work which is not included in the current year assessment. The current year assessment gives a higher weighting to financial statements work.

Figure 2: 2016 Audit quality performance



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 and HB COUNT) of the QRP.

22 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 2015/16, KPMG’s overall rating for audit quality was amber as the overall audit quality score was below 2. We consider each of the individual elements making up this rating below.

Figure 3: 2016 Comparative performance for audit quality



Financial statements audit work

24 The firm provided the results of five QMRs for financial statement audit files. We reviewed these and agreed with all but one of the firm assessments. In that case we believed a score of 1 was more appropriate because of the number of points arising. In addition, the AQR reviews for PSAA provided a score for three additional financial statements assessments.

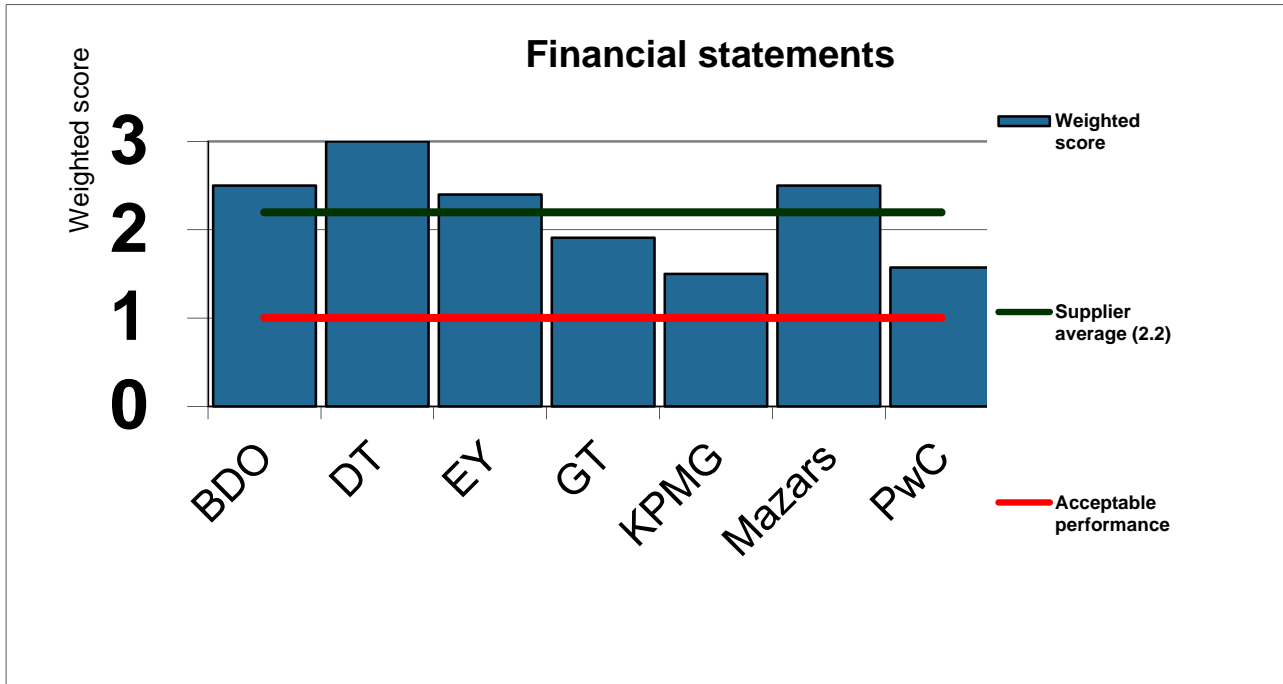
25 The improvement areas from these individual QMRs and the AQR review included:

- ensuring clearer documentation on file on the overall risk assessment and the work required;
- ensuring there is sufficient documentation on file to support materiality judgements;
- ensuring that there is sufficient challenge to assertions from management;

- ensuring work on service organisations is sufficiently robust;
- ensuring that sufficient audit procedures are undertaken in relation to property valuations.

26 Figure 4 shows the comparative performance for financial statement audit work based on the results of the QMRs and AQR review. KPMG's average score was 1.5 compared to an all firm average of 2.2.

Figure 4: 2016 financial statements performance



27 For 2014/15, KPMG's rating for financial statements work was amber because of the relatively low score (average less than 2) on financial statements audit work.

Figure 5: 2015 Comparative performance for financial statements audit work



VFM conclusion audit work

28 The firm provided the results of seven QMRs for VFM conclusion audit files. We reviewed the results and agreed with the assessments.

29 In addition, the AQR review for PSAA provided a score for one additional VFM conclusion assessment.

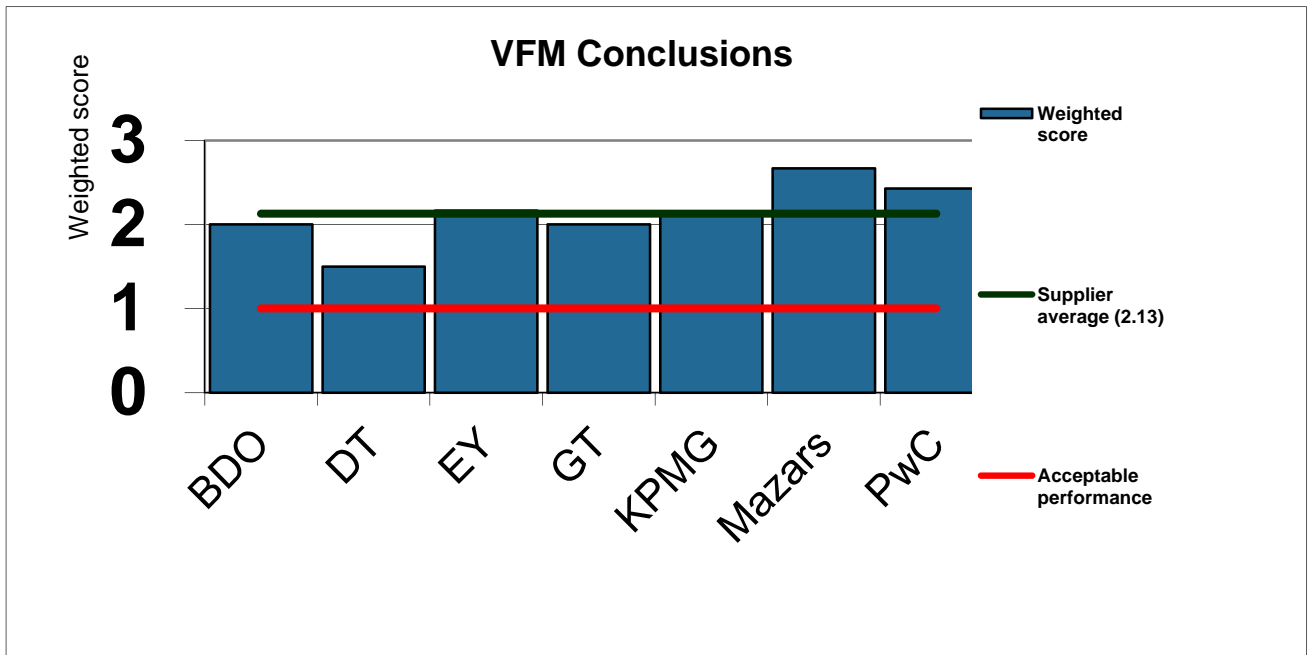
30 The improvement areas from these individual QMRs and the AQR review included:

- ensuring better evidence of why matters identified do not impact the type of VFM conclusion given;

- ensuring clearer documentation on file on the consideration of risks and work undertaken in response to significant risks identified; and
- ensuring clear and accurate reporting of VFM conclusion work to the Audit Committee.

31 Figure 6 shows the comparative performance for VFM audit work based on the results of the QMRs and AQR review. KPMG's score was 2.13 compared to an all firm average of 2.13.

Figure 6: 2016 VFM conclusion performance



32 For 2014/15, KPMG's rating was amber on VFM conclusion work because one review was scored 0.

Figure 7: 2015 Comparative performance for VFM conclusion audit work



Housing benefit work

33 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.

34 The firm provided the results of eight QMRs for HB COUNT audit work. We reviewed the results of these and we agreed with all of the firm's assessments.

35 The improvement areas from these individual QMRs included:

- ensuring compliance with the certification instructions on housing benefit work, particularly around mapping and evidencing conclusions against the specific test requirements;
- ensuring that any amendments made to the claim relate to isolated errors only.

36 Figure 8 shows the comparative performance of each firm based on the QMRs. KPMG's average score was 2.28 compared to an all firm average of 2.48.

Figure 8: 2016 HB COUNT performance



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

Figure 9: 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

38 In 2015/16, KPMG confirmed to PSAA that its systems and procedures for regulatory compliance were the same as those in the previous year. Nothing came to PSAA's attention in year to suggest this is not correct, and we concluded that it could continue to rely on KPMG's systems.

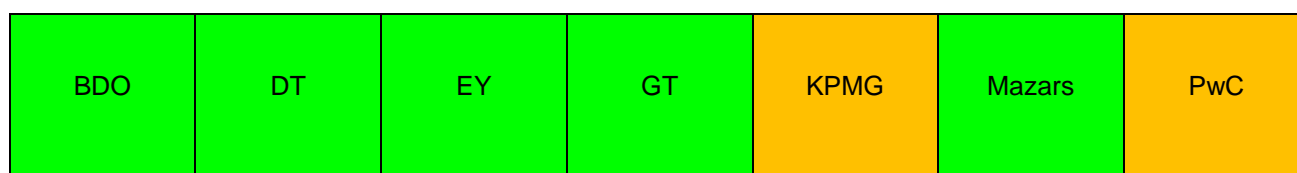
Systems for compliance with our information assurance requirements

39 During 2015, PSAA instructed its Internal Auditor (TIAA) to undertake a review of the firm's information assurance arrangements based on a return completed by the firm. The review considered whether the firm met the requirements of information governance legislation. There were no issues arising as a result of this review and we concluded that we could continue to rely on the firm's arrangements.

Quarterly monitoring of our regulatory requirements

40 PSAA 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 10 details the firm's overall regulatory compliance RAG rating compared to other firms.

Figure 10: 2016 Comparative performance for regulatory compliance



41 The firm performed reasonably well across all of the regulatory compliance requirements, with all but one of the 15 indicators being rated as amber or green. The firm has performed poorly on the timely resolution of objections and has been rated as red in this area, although it has had to deal with some issues handed over from a previous auditor. The firm should act to resolve all longstanding objections as soon as possible.

42 We have included a summary at Appendix 3 of the results of the 2015/16 regulatory compliance monitoring RAG ratings, comparing the firm's performance against the overall performance for all firms.

Client satisfaction surveys

43 All firms agreed to undertake client satisfaction surveys for 2014/15 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.

44 The firm received results from a sample of audited bodies on completion of their 2014/15 audit. Table 1 details the questions and the average score.

Table 2- Satisfaction survey results

Question	Average score (max. 10)*
How satisfied are you overall with your audit?	8.8
How satisfied are you with the amount of contact with your Engagement Lead?	8.9
How satisfied are you with the amount of contact with your Audit Manager?	9.0
How satisfied are you with the technical competence and skills of your audit team?	8.8
How satisfied are you with your auditor's performance at committee meetings?	9.3
How satisfied are you with your auditor's understanding of the key issues and risks specific to your organisation?	9.1
How satisfied are you with the usefulness of your auditor's reports?	8.5
How satisfied are you with the timeliness of your auditor's reports?	8.6

*the KPMG scoring system has a maximum rating of 5. The survey results have been ratioed against a maximum score of 10 to make the results comparable with other firms.

45 These results show that audited bodies are satisfied with the level of service received from KPMG and for 2015/16, KPMG's rating for client satisfaction was green.

Figure 11: 2016 Comparative performance for client satisfaction

BDO	DT	EY	GT	KPMG	Mazars	PwC

46 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 2015/16 quality review programme

47 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 clearer documentation on file on the overall risk assessment and the work required;
- ensuring there is sufficient documentation on file to support materiality judgements;
- ensuring that there is sufficient challenge to assertions from management;
- ensuring work on service organisations is sufficiently robust;
- ensuring that sufficient audit procedures are undertaken in relation to property valuations.

VFM

- ensuring better evidence of why matters identified do not impact the type of VFM conclusion given;
- ensuring clearer documentation on file on the consideration of risks and work undertaken in response to significant risks identified; and
- ensuring clear and accurate reporting of VFM conclusion work to the Audit Committee.

HB

- ensuring compliance with the certification instructions on housing benefit work, particularly around mapping and evidencing conclusions against the specific test requirements; and
- ensuring that any amendments made to the claim relate to isolated errors only.

Compliance

- the firm should resolve longstanding objections as soon as possible.

48 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 quality team and then communicated to staff.

Appendix 1 – Weightings to calculate overall quality score

Table 3- weightings

Audit element	Local government	NHS
	%	%
Financial statements	60	70
VFM Conclusions	30	30
HB	10	-
Total	100	100

Appendix 2 - Audit quality and regulatory compliance RAG rating

Table 4- QRP elements of financial statements, VFM conclusions 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 5- Regulatory compliance RAG rating based on 15 quarterly monitoring indicators

Rating	Overall firm level score- indicators
Green	11 or more at green and no more than two at red.
Red	Six or more indicators at red.
Amber	Neither green nor red.

Table 6- Combined audit quality and regulatory compliance RAG

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

Table 7- 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	A
7-10	very good / very satisfied / outstanding	G

Appendix 3 - Results of 2015/16 regulatory compliance monitoring

Activity	Target	All firms % (no).	KPMG % (no).	Red, amber, green (RAG) status
Issue of planning letters.	100% by 30 April 2015.	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.
Issue of NHS audit opinions.	100% by 29 May 2015 (CCG) and 5 June 2015 (NHS Trusts).	97.7 (7)	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of NHS VFM conclusions.	100% by 29 May 2015 (CCG) and 5 June 2015 (NHS Trusts).	98.0 (6)	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 to NHS audited bodies.	100% by 31 July 2015.	99.7 (1)	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of NHS annual audit letters.	100% by 31 July 2015.	98.7 (4)	100	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of LG audit opinions.	100% by 30 September 2015.	97.1 (15)	94.9 (6)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of LG VFM conclusions.	100% by 30 September 2015.	97.1 (15)	94.9 (6)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of WGA reports.	100% issued by 2 October 2015.	94.7 (27)	93.1 (8)	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).	KPMG % (no).	Red, amber, green (RAG) status
Confirmation of final LG fee to audited body.	100% by 30 October 2015.	96.7 (17)	94.8 (6)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Issue of LG annual audit letters.	100% by 30 October 2015.	97.5 (13)	94.8 (6)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Audited body database information.	Accurate information provided to PSAA.	98.9 (15)	98.5 (5)	G >95.01% delivered or 1 missed. A 90.01 - 95.00% delivered or 2 missed. R <90.00% delivered or 3 missed.
Complaints upheld against auditors.	No complaints upheld against auditors.	0	0	G = 0 upheld A = 1 R = 2 or more
Non-compliance with requirements on independence issues.	No instances of non-compliance.	2	2	Firm G = up to 1 A = 2 R = 3 or more Regime G = up to 7 A = 8 R = 9 or more.
Objections decided upon within nine months.	100% of objections decided upon within nine months.	14	5	Firm G = up to 1 A = 2 R = 3 or more Regime G = up to 7 A = 8 R = 9 or more.
Attendance at Contact Partner group meetings.	No meetings missed.	0	0	Firm G = up to 2 A = 3 R = 4 or more Regime G = up to 7

Activity	Target	All firms % (no).	KPMG % (no).	Red, amber, green (RAG) status
				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
Key messages from FRC annual reports	<p>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.</p> <p>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</p> <p>A need to adequately identify the threats and related safeguards to auditor independence and to appropriately communicate these to audit committees.</p>	The firm will address these points, to the extent that they are relevant, as part of its response to the FRC.
AQR review on PSAA work (across all firms)	<p>Clearly justify and document materiality considerations and not default automatically to the top of the materiality range;</p> <p>Consider property valuations as significant risk areas, and ensure that when considering external valuers' work there is review and challenge of management assumptions. In addition, audit teams need to verify the completeness and accuracy of source data used by experts and evidence that assets are revalued on the appropriate cycle in accordance with accounting policies;</p>	We always take feedback from AQR and other regulators seriously and consider what action is necessary both for the engagements reviewed and more widely. In line with our usual practice, we have performed an annual review and refresh of our audit approach and guidance for public sector clients. This takes account of the findings from external regulatory reviews and discussions with the AQR team, internal quality monitoring reviews and other relevant technical matters. Whilst not all of the general matters reported by AQR were relevant to the review of KPMG audit work, we take account of these also. Any

	<p>Evidence journals selected for testing by audit teams, while improving procedures to ensure the completeness of the population of journals considered for testing;</p> <p>Better evidence work on asset valuations and ensure actuarial assumptions are appropriately challenged; and</p> <p>Ensure that VFM work covers financial resilience over an appropriate period and that the outcomes from VFM work are reporting in sufficient detail to those charged with governance.</p>	<p>changes to our audit approach and guidance are communicated to our teams.</p>
<p>Financial statements</p>	<p>Ensuring clearer documentation on file on the overall risk assessment and the work required;</p> <p>Ensuring there is sufficient documentation on file to support materiality judgements;</p> <p>Ensuring that there is sufficient challenge to assertions from management;</p> <p>Ensuring work on service organisations is sufficiently robust;</p> <p>Ensuring that sufficient audit procedures are undertaken in relation to property valuations.</p>	<p>The internal quality monitoring of our financial statements audit work this year again demonstrated that good quality standards are achieved overall, but a number of isolated learning points were identified. We respond positively to all matters arising from quality monitoring reviews. For example:</p> <ul style="list-style-type: none"> • we perform a root cause analysis for all review findings to identify learning points for individual teams and to consider whether there are any common themes or development areas requiring central consideration; • we communicate a summary of our quality findings to our Partners, Directors and audit staff to highlight learning points for future audits; and • we share the findings with our technical teams to consider when developing future audit guidance and material.

VFM conclusions	<p>Ensuring better evidence of why matters identified do not impact the type of VFM conclusion given;</p> <p>Ensuring clearer documentation on file on the consideration of risks and work undertaken in response to significant risks identified; and</p> <p>Ensuring clear and accurate reporting of VFM conclusion work to the Audit Committee.</p>	<p>As with the areas above, we analyse the review findings to ensure that messages on improvement points such as these are fed back to our staff. We have also refreshed our VFM audit programmes for the 2015/16 audit year, recognising that there is now a new VFM methodology issued by the National Audit Office.</p>
Housing benefit	<p>Ensuring compliance with the certification instructions on housing benefit work, particularly around mapping and evidencing conclusions against the specific test requirements; and</p> <p>Ensuring that any amendments made to the claim relate to isolated errors only.</p>	<p>We recognise the need to continually review our arrangements to ensure our staff are sufficiently trained and have access to appropriate support and guidance on this very technical and prescriptive area of work. We have focused on this area of work in recent years to ensure our arrangements continually improve. As with other areas, we ensure that messages on improvement points such as these are fed back to our staff.</p>
Regulatory compliance	<p>The firm should resolve longstanding objections as soon as possible.</p>	<p>We always aim to conclude on objections on a timely basis, but their complex nature can sometimes mean that this is not possible within the nine month target date set by PSAA. Where delays are unavoidable, for example to allow sufficient evidence to be obtained and considered or for objectors or other interested parties to be consulted, then we always take the time required. As noted in PSAA's commentary, we inherited some longstanding and complex objections and these have taken some time to conclude. We currently have eight open objections, three of which are over the nine month completion target and are still ongoing and being actively progressed. One of the eight objections is in the process of being concluded</p>

		and a further one of the eight has now been withdrawn so we are beginning procedures to close the audit. This will bring our open objections to six.
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