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# SUPPLEMENTARY AGENDA

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## GOVERNANCE & AUDIT & STANDARDS COMMITTEE

FRIDAY, 21 JANUARY 2022 AT 2.30 PM

COUNCIL CHAMBER - THE GUILDHALL

Telephone enquiries to James Harris on 023 9260 6065

Email: [james.harris@portsmouthcc.gov.uk](mailto:james.harris@portsmouthcc.gov.uk)

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### Membership

Councillor Leo Madden (Chair)

Councillor Daniel Wemyss (Vice-Chair)

Councillor Stuart Brown

Councillor Charlotte Gerada

Councillor Lee Hunt

Councillor John Smith

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(NB This supplementary agenda should be retained for future reference with the main agenda and minutes of this meeting).

### SUPPLEMENTARY AGENDA

- 4 Portsmouth City Council Audit Results Report: Year ended 31 March 2021 (updated January 2022) (Pages 3 - 60)**

Portsmouth City Council's Audit Results as updated January 2022 - for noting.

Published 17 January 2022

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**Portsmouth City Council  
Audit results report**

**Year ended 31 March 2021**

**January 2022**

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Agenda Item 4



Building a better  
working world



14 January 2022

**Dear Governance and Audit and Standards Committee Members**

We are pleased to attach our audit results report, summarising the status of our audit for the forthcoming meeting of the Governance and Audit and Standards Committee.

Our audit of Portsmouth City Council for the year ended 31 March 2021 is substantially complete. We will provide an update on the status of the audit at the meeting.

The audit is designed to express an opinion on the 2020/21 financial statements and address current statutory and regulatory requirements. This report contains our findings related to the areas of audit emphasis, our views on Portsmouth City Council's accounting policies and judgements and material internal control findings. Each year sees further enhancements to the level of audit challenge and the quality of evidence required to achieve the robust professional scepticism that society expects. We thank the management team for supporting this process. We have also included an update on our work on value for money arrangements.

This report is intended solely for the use of the Governance and Audit and Standards Committee, other members of the Authority, and senior management. It should not be used for any other purpose or given to any other party without obtaining our written consent.

We would like to thank your staff for their help during the engagement.

We welcome the opportunity to discuss the contents of this report with you at the Governance and Audit and Standards Committee meeting on 21 January 2022.

Yours faithfully

Helen Thompson, Associate Partner  
For and on behalf of Ernst & Young LLP  
Encl

# Contents



Public Sector Audit Appointments Ltd (PSAA) issued the “Statement of responsibilities of auditors and audited bodies”. It is available from the PSAA website (<https://www.psaa.co.uk/audit-quality/statement-of-responsibilities/>). The Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The “Terms of Appointment and further guidance (updated April 2018)” issued by the PSAA sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and in legislation, and covers matters of practice and procedure which are of a recurring nature.

This report is made solely to Governance and Audit and Standards Committee and management of Portsmouth City Council in accordance with the statement of responsibilities. Our work has been undertaken so that we might state to the Governance and Audit and Standards Committee, and management of Portsmouth City Council those matters we are required to state to them in this report and for no other purpose. To the fullest extent permitted by law we do not accept or assume responsibility to anyone other than the Governance and Audit and Standards Committee and management of Portsmouth City Council for this report or for the opinions we have formed. It should not be provided to any third-party without our prior written consent.





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# Executive Summary



# Executive Summary

## Scope update

In our audit planning report presented at the 16 July 2021 Governance and Audit and Standards Committee meeting, we provided you with an overview of our audit scope and approach for the audit of the financial statements. We carried out our audit in accordance with this plan.

## Status of the audit

Our audit of Portsmouth City Council for the year ended 31 March 2021 is substantially complete. We will provide a further update on the status of the audit at the 21 January meeting. Subject to satisfactory completion of the following outstanding items we expect to issue an unqualified opinion on the Council's financial statements in the form which appears at Section 3. However until work is complete, further amendments may arise:

- Remaining general audit procedures required by the ISAs to be completed by the audit team
- Update to going concern assessment (see p.10)
- Completion of internal review processes and responses to any matters arising on completed work

The following are also outstanding or are to be completed as part of the conclusion of the audit:

- completion of our audit conclusion procedures
- review of the final version of the financial statements
- completion of subsequent events review
- receipt of the signed management representation letter
- completion of procedures required by the National Audit Office (NAO) regarding the Whole of Government Accounts submission

We do not expect to issue the audit certificate at the same time as the audit opinion, due to delays relating to the Whole of Government Accounts process, impacting all councils where audit procedures are required on the submission. HM Treasury has not yet issued the template return, or the related guidance to auditors; the work cannot be performed until these are available. Currently, there is no confirmed timescale for their release.

Given that the audit process is still ongoing, we will continue to challenge the remaining evidence provided and the final disclosures in the narrative report and accounts which could influence our final audit opinion.



## Executive Summary

### Auditor responsibilities under the new Code of Audit Practice 2020

Under the Code of Audit Practice 2020 we are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. The 2020 Code requires the auditor to design their work to provide them with sufficient assurance to enable them to report to the Council a commentary against specified reporting criteria (see below) on the arrangements the Council has in place to secure value for money through economic, efficient and effective use of its resources for the relevant period.

The specified reporting criteria are:

- Financial sustainability  
How the Council plans and manages its resources to ensure it can continue to deliver its services;
- Governance  
How the Council ensures that it makes informed decisions and properly manages its risks; and
- Improving economy, efficiency and effectiveness:  
How the Council uses information about its costs and performance to improve the way it manages and delivers its services.

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### Status of the audit – Value for Money

At the Governance and Audit and Standards Committee meeting held on 16 July 2021, we provided a verbal update that based on the planning procedures, we had not identified any significant weaknesses in your arrangements. This has remained the case through the remainder of the audit.

We plan to issue the VFM commentary as part of issuing the Auditor's Annual Report, following completion of the audit.





## Executive Summary

### Audit differences

There are no adjusted differences above our performance materiality level, arising from work completed to date.

We have identified five audit differences in the draft financial statements which management has chosen not to adjust due to their very low net value, in relation to the valuation of Property, Plant and Equipment and Investment Property. These differences are individually above our reporting threshold, however, their net effect on the related balances does not impact the overall audit opinion. Further detail is provided in Section 4.

We ask that a rationale as to why these are not corrected be approved by the Governance and Audit and Standards Committee and included in the Letter of Representation. We agree with management's assessment that the impact is not material.

A small number of other amendments were made to disclosures appearing in the financial statements as a result of our work.

Should any further adjusted and unadjusted misstatements be identified, we will update the Committee at the meeting on 21 January 2022.

### Other reporting issues

We have reviewed the information presented in the Annual Governance Statement for consistency with our knowledge of the Council. We have no matters to report as a result of this work.

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of the financial statements audit and provide an update to the Committee following completion of this work. Currently, the issue of the template submission by HM Treasury has been delayed, meaning that this work cannot be performed until it is.

We have no other matters to report.



## Executive Summary

### Control observations

We have adopted a fully substantive approach, so have not tested the operation of controls.

As part of our work, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. Although our audit was not designed to express an opinion on the effectiveness of internal control, we are required to communicate to you significant deficiencies in internal control identified during our audit.

There are no matters we wish to report.

### Independence

Please refer to Section 9 for our update on Independence.



## Executive Summary

### Areas of audit focus

In our audit planning report we identified a number of key areas of focus for our audit of the financial statements of Portsmouth City Council. This report sets out the status of our work and our observations in relation to these areas, including our views on areas which might be conservative and areas where there is potential risk and exposure. Our consideration of these matters and others identified during the period is summarised within the "Areas of Audit Focus" section of this report.

Fraud Risk	Findings & Conclusions
Misstatements due to fraud or error	We have not identified any material weaknesses in controls or evidence of material management override, instances of inappropriate judgements being applied; or any other transactions during our audit which appear unusual or outside the Council's normal course of business.
Inappropriate capitalisation of revenue expenditure	Our sample testing of additions to Property Plant & Equipment (PPE) and Revenue Expenditure Funded from Capital Under Statue (REFCUS): <ul style="list-style-type: none"><li>• Found costs had been correctly classified as capital and included at the correct value.</li><li>• Did not identify any revenue items that were incorrectly classified as capital.</li></ul> Our review of judgements taken by management found them to be reasonable.
Significant Risk	Findings & Conclusions
Valuation of Investment Property and Land and Buildings (valued using EUV & FV method)	Our work in this area is now complete. Further details of our findings from this work are set out in Section 2 of this report.
Valuation of Lakeside North Harbour asset	Our work in this area is now complete. Further details of our findings from this work are set out in Section 2 of this report.



## Executive Summary

### Areas of audit focus (continued)

Area of audit focus / Inherent risk	Findings & Conclusions
PFI accounting	<p>The Council has four PFI arrangements, two of which are material to our audit. PFI accounting is a complex area and therefore more susceptible to error. Based on our work we are satisfied that:</p> <ul style="list-style-type: none"> <li>Inputs to the PFI accounting models were supported by evidence.</li> <li>The models continued to operate correctly.</li> <li>Output from the models was correctly reflected by the relevant accounting entries and disclosures in the financial statements.</li> <li>PFI assets were correctly accounted for and disclosed.</li> </ul>
Pension Liability Valuation	Our work in this area is now complete. We have no matters to report regarding the Pension Liability Valuation. Further details are set out in Section 2 of this report.
Going Concern (Area of audit focus)	At the time of writing this report, we are awaiting an updated cashflow forecast to make a final update of our work on going concern through to 12 months from the expected audit opinion date. Subject to completion of this, we are satisfied that management's going concern assessment is appropriate based on our work to date. We held discussions with management and agreed amendments to the final disclosure in financial statements where these were judged necessary.
Accounting for Covid-19 related government grants (Inherent risk)	Subject to completion of final documentation procedures by the audit team, we expect to conclude that the accounting treatment adopted for Covid-19 related government grants accorded with the Council's assessment of whether it was acting as agent or principal. Our detailed testing of funding claimed identified no issues.
Restatement of the Comprehensive Income and Expenditure Statement (CIES), Expenditure and Funding Analysis (EFA) and related disclosure notes	No issues have been identified from our work to address this risk.
Group accounts assessment	No issues have been identified from our work to address this risk.
Valuation of Land & Buildings valued at Depreciated Replacement Cost (DRC), and Housing Revenue Account (HRA) properties	Our work in this area is now complete. Further details of our findings from this work are set out in Section 2 of this report.



## Executive Summary

### Areas of audit focus (continued)

We ask you to review these and any other matters in this report to ensure:

- ▶ There are no other considerations or matters that could have an impact on these issues
- ▶ You agree with the resolution of the issue
- ▶ There are no other significant issues to be considered.

There are no matters, apart from those reported by management or disclosed in this report, which we believe should be brought to the attention of the Governance and Audit and Standards Committee.



## 02 Areas of Audit Focus







# Areas of Audit Focus

## Significant risk

### Misstatements due to fraud or error

#### What is the risk?

The financial statements as a whole are not free of material misstatements whether caused by fraud or error.

As identified in ISA (UK) 240, management is in a unique position to perpetrate fraud because of its ability to manipulate accounting records directly or indirectly and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.

We identify and respond to this fraud risk on every audit engagement.

#### What judgements are we focused on?

Our assessment of risk led us to create a series of criteria for the testing of journals, focusing specifically on areas that could be open to management manipulation. We have also focused specifically on capitalisation of expenditure as a potential area of manipulation, which is recorded as a separately identified significant risk on the following page of this report.

Our work on estimates focussed on PPE valued at FV/EUV (including Lakeside) and Investment Property valuation which we have identified as areas of significant risk, and other PPE valuations and IAS19 pension estimates, which we have identified as areas of higher inherent risk. Our findings in these areas are set out on the subsequent pages in this section of our report.

#### What did we do?

Our approach focused on:

- Testing the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements.
- Assessing accounting estimates for evidence of management bias.
- Evaluating the business rationale for significant unusual transactions.

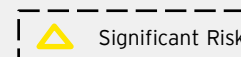
Further to this, we have:

- Inquired of management about risks of fraud and the controls put in place to address those risks, as well as gaining an understanding of the oversight given by those charged with governance of management's processes over fraud.
- Considered the effectiveness of management's controls designed to address the risk of fraud.

#### What are our conclusions?

Our work in relation to this risk is now complete.

- We have not identified any evidence of material management override.
- We have not identified any instances of inappropriate judgements being applied or other management bias both in relation to accounting estimates and other balances and transactions.
- We have not identified any other transactions which appeared unusual or outside the Council's normal course of business





## Areas of Audit Focus

### Significant risk

**Risk of fraud in revenue and expenditure recognition inappropriate capitalisation of revenue expenditure**

#### What is the risk?

Under ISA 240 there is a presumed risk that revenue may be misstated due to improper revenue recognition. In the public sector, this requirement is modified by Practice Note 10 issued by the Financial Reporting Council, which states that auditors should also consider the risk that material misstatements may occur by the manipulation of expenditure recognition.

We have assessed the risk is most likely to occur through the inappropriate capitalisation of revenue expenditure, as there is an incentive to reduce expenditure which is funded from council tax. This could then result in funding of that expenditure, that should properly be defined as revenue, through inappropriate sources such as capital receipts, capital grants, or borrowing.

The value of additions to Property, Plant & Equipment (PPE) including Assets Under Construction in 2020/21 was £98m. The value of Revenue Expenditure Funded from Capital Under Statue (REFCUS) was £56.4m.

#### What judgements are we focused on?

Our work has focussed on any judgements exercised in determining whether expenditure is capital in nature, and therefore appropriate to be capitalised rather than charged to the Comprehensive Income and Expenditure Statement.

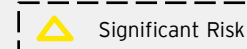
#### What did we do?

Our approach focused on:

- We selected a sample of additions, using lowered testing thresholds, to test and confirm the item was appropriate to capitalise through agreement to evidence such as invoices and capital expenditure authorisations.
- We selected a sample of REFCUS expenditure, using lowered testing thresholds, to confirm it was appropriate for the expenditure incurred to be funded from capital sources.

#### What are our conclusions?

Our testing of additions and REFCUS expenditure has not identified any indications of inappropriate capitalisation of revenue expenditure or inappropriate classification of transactions as REFCUS.





## Areas of Audit Focus

### Significant risk

#### Valuation of Lakeside North Harbour asset

##### What is the risk?

During the 2019/20 financial year, Portsmouth City Council purchased the Lakeside North Harbour office complex located in Portsmouth as part of their regeneration policy for the area.

The business campus sits in a 120-acre site, located to the north of Portsmouth City Centre, and comprises 594,000 sq ft of offices, 3,000 parking spaces, a day nursery and 8.7 acres of development land.

This is a highly significant and material property, plant and equipment asset. The valuation of the asset is carried out in accordance with the methodologies and bases for estimation set out in relevant professional standards. However, a number of key inputs into the valuation are judgmental and subjective.

Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet in respect of this asset.

##### What did we do?

We commissioned an EY specialist (EY Real Estates) to review the valuation and specifically to:

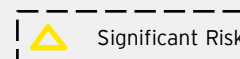
- consider the competence, capability and objectivity of the Council's valuers;
- consider the scope of valuers' work; and
- challenge the assumptions and methodology used by the valuers by reference to external evidence.

We also:

- confirmed that the valuation has been accurately processed in the financial statements.

##### What are our conclusions?

Our specialists' review of the valuation of Lakeside North Harbour has concluded that each of the assets comprising the Lakeside campus is within the expected valuation range. We therefore have not identified any issues with the valuation of Lakeside in the financial statements.





## Areas of Audit Focus

### Significant risk

#### Valuation of Investment Property and Land and Buildings (valued using EUV & FV method)

##### What is the risk?

The value of Investment Property (IP) and Land and Buildings (valued using EUV/FV method) represent significant balances in the Council's accounts and are subject to valuation changes, impairment reviews, depreciation and market fluctuations. Management is required to make material judgements and apply estimation techniques to calculate the year-end balances recorded in the balance sheet. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

Given the nature of Covid-19 and the fact that 2020/21 was predominantly influenced by local and national lockdowns, we anticipate that the valuer will not be able to conduct site visits due to the restrictions that are in place and that the valuer will have to perform a remote approach to valuing the properties which will further increase the risk around these valuations.

The market volatility brought about by the advent of Covid-19 in the last quarter in the prior year and throughout the 2020/21 year relates primarily to assets carried at a market value - either fair value (investment property and surplus assets) or Existing Use Value (EUV) as a proxy for FV (some of land and buildings). Assets carried at depreciated replacement cost (DRC) and EUV-SH (Council housing) are not considered to be impacted in the same way.

The value of IP in the draft accounts at 31/03/2021 was £185m. The value of PPE valued at existing use value was in 2020/21 £239m (of which Lakeside was £139m) and at fair value was £8m.

##### What did we do?

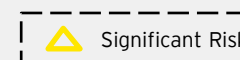
We:

- ▶ Commissioned EY Real Estates, our internal specialists on asset valuations, to consider the valuation approach in more detail for a sample of assets.
- ▶ Considered the work performed by the Council's valuer, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work.
- ▶ Sample tested key asset information used by the valuer in performing its valuation and challenge the key assumptions used by the valuer.
- ▶ Tested whether valuations have been correctly processed in the financial statements.
- ▶ Considered the annual cycle of valuations to ensure that assets have been valued within a suitable rolling programme as required by the Code for PPE, and annually for IP. We will also consider if there are any specific changes to assets that have occurred and whether these have been communicated to the valuer.
- ▶ Reviewed assets not subject to valuation in 2020/21 to confirm that the remaining asset base is not materially misstated.

##### What are our conclusions?

Our work on valuations is now complete. We have involved our internal specialists in testing a representative sample of investment property and land and buildings (valued using EUV & FV method), with the remainder of the sample being tested by the audit team.

Further information on our findings from this work is shown on the next page.





## Areas of Audit Focus

### Valuation of Investment Property and Land and Buildings (valued using EUV & FV method)

#### What are our conclusions? (continued)

We tested a sample of 24 investment properties and 24 land and buildings assets valued at existing use value (excluding Lakeside, which is reported on separately above).

As a result of this work we identified two audit differences which management has chosen not to adjust due to the net value, as follows. These matters are also reflected in Section 4:

- ▶ For one investment property asset, the valuer used a yield which was outside the benchmark range based on national comparators, resulting in a lower than expected valuation. We reviewed the remaining investment property population for similar assets, to gauge the overall effect of this issue. We calculated a projected overall understatement of the investment property balance of £964k, which is above our reporting threshold but not material. This difference is judgemental in nature.
- ▶ For one land and buildings asset, the valuer had miscalculated the internal area for the building, resulting in an overstatement of PPE of £1.47m. We note that the net impact on PPE of this difference and the one reported on p.19 is £0.24m understatement, which is trivial and therefore does not impact the overall audit opinion.

We undertook extensive work to review the key assumptions used in the valuation process, both by the Council's internal valuations team, and by its external valuation specialists. From this work we noted:

- ▶ Purchaser costs are not separately allowed for in valuations performed by the internal valuations team; however, they form part of the overall yield consideration. We would recommend these are separately considered going forward.
- ▶ Management fees are allowed for separately in valuations performed by the internal valuations team. The expectation of our specialists is that these would usually be incorporated within the yield %, and we would recommend that this is considered going forward.



## Areas of Audit Focus

### Other areas of audit focus

#### Valuation of Land & Buildings valued at Depreciated Replacement Cost (DRC), and Housing Revenue Account (HRA) properties

##### What is the risk?

The value of Property, Plant and Equipment (PPE) represents a significant balance in the Council's accounts and is subject to valuation changes, impairment reviews and depreciation charges. Management is required to make material judgemental inputs and apply estimation techniques to calculate the year-end balances recorded in the balance sheet.

ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

The Council has revalued £42m of DRC assets in 2020/21, and £663m of HRA properties.

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##### What did we do?

20. We:
- ▶ Considered the work performed by the Council's valuer, including the adequacy of the scope of the work performed, their professional capabilities and the results of their work;
  - ▶ Sample tested key asset information used by the valuers in performing their valuation and challenge the key assumptions used by the valuer;
  - ▶ Tested whether valuations have been correctly processed in the financial statements;
  - ▶ Considered the annual cycle of valuations to ensure that assets have been valued within a 5 year rolling programme as required by the Code. We will also consider if there are any specific changes to assets that have occurred and whether these have been communicated to the valuer;
  - ▶ Reviewed assets not subject to valuation in 2020/21 to confirm that the remaining asset base is not materially misstated; and

##### What are our conclusions?

Our work on valuations is now complete. We have involved our internal specialists in testing a representative sample of land and buildings (valued using DRC method), with the remainder of the sample being tested by the audit team. Work on HRA properties has been performed by the audit team.

Further information on our findings from this work is shown on the next page.





## Areas of Audit Focus

### Valuation of Land & Buildings valued at Depreciated Replacement Cost (DRC), and Housing Revenue Account (HRA) properties

#### What are our conclusions? (continued)

We tested a sample of 9 land and buildings assets valued at depreciated replacement cost, and 20 HRA Beacon properties. We do not have any matters to report regarding Housing Revenue Account valuations.

As a result of our work on land and buildings valued at depreciated replacement cost, we identified three audit differences which management has chosen not to adjust due to the net value, as follows. These matters are also reflected in Section 4:

- ▶ For one land and buildings asset, the valuer had used the incorrect asset life in the valuation calculation, resulting in an understatement of PPE of £1.71m. We note that the net impact on PPE of this difference and the one reported on p.17 is £0.24m understatement, which is trivial and therefore does not impact the overall audit opinion.

For the population of land and buildings assets valued at depreciated replacement cost, the internal valuer had not allowed for professional fees as expected within the valuation calculations performed in 2019/20 and 2020/21. To quantify the impact of this finding, we have performed a calculation across the whole affected population of assets. This resulted in a total calculated £4.07m understatement of PPE.

- ▶ For all land and buildings assets valued at depreciated replacement cost (across all years), the internal valuer had included a contingency allowance in the valuation calculations, which was not expected based on best practice. To quantify the impact of this finding, we have performed a calculation across the whole affected population of assets. This resulted in a total calculated £3.97m overstatement of PPE.

The net impact of the 2<sup>nd</sup> and 3<sup>rd</sup> bullet points above is therefore £0.1m, which does not impact the overall audit opinion.

We undertook extensive work to review the key assumptions used in the valuation process, both by the Council's internal valuations team, and by its external valuations specialists. From this work we noted:

- ▶ Following on from the findings above, professional fees should be included, and contingency fees excluded, from depreciated replacement cost valuations going forward.



## Areas of Audit Focus

### Other areas of audit focus

#### Going Concern

##### What is the risk?

There is a presumption that the Council will continue as a going concern for the foreseeable future. However, the Council is required to carry out a going concern assessment that is proportionate to the risks it faces. In light of the continued impact of Covid-19 there was a need for the Council to ensure its going concern assessment, including its cashflow forecast, is thorough and appropriately comprehensive.

The Council is also required to ensure that its going concern disclosure within the statement of accounts adequately reflects its going concern assessment and in particular highlights any uncertainties it has identified.

In addition, the auditing standard in relation to going concern (ISA570) has been revised with effect for the 2020/21 accounts audit.

##### What did we do?

We:

- Challenged management's identification of events or conditions impacting going concern.
- Tested management's resulting assessment of going concern by evaluating supporting evidence (including consideration of the risk of management bias).
- Reviewed the Council's cashflow forecast covering the foreseeable future to ensure that it has sufficient liquidity to continue to operate as a going concern, including an assessment of any underlying need to borrow.
- Undertook a 'stand back' review to consider all of the evidence obtained, whether corroborative or contradictory, in drawing our conclusions on going concern.
- Challenged the disclosure made in the accounts in respect of going concern and any material uncertainties.

##### What are our conclusions?

At the time of writing this report, we are awaiting an updated cashflow forecast to make a final update of our work on going concern through to 12 months from the expected audit opinion date. Subject to completion of this, we are satisfied that management's going concern assessment is appropriate based on our work to date. We held discussions with management and agreed amendments to the final disclosure in financial statements where these were judged necessary.



## Areas of Audit Focus

### Other areas of audit focus

#### PFI accounting

##### What is the risk?

The Council has four PFI arrangements, two of which are material to our audit. PFI accounting is a complex area, and a detailed review of these arrangements was undertaken by our internal specialist in 2016/17. We reviewed the accounting entries and disclosures in relation to PFI in detail in 2020/21, with a focus on any significant changes since the specialist's review.

The total finance lease liability for the PFIs was £56m at 31 March 2021, and the net book value of PFI assets was £138.8m.

##### What did we do?

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- We:
- Reviewed assurances brought forward from prior years regarding the appropriateness of the PFI financial models.
  - Reviewed the PFI financial models for any significant changes.
  - Ensured the PFI accounting models had been updated for any service or other agreed variations and confirmed consistency of current year models with prior year brought forward assurances.
  - Agreed outputs of the models to the accounts, and reviewed the completeness and accuracy of disclosures.

##### What are our conclusions?

We have assessed brought forward assurances as remaining appropriate, noted no significant changes in the PFI models, ensured the appropriateness of any updates and the overall consistency of current year models with the prior year. We have agreed the outputs of the models to the accounts.

No issues have been identified with PFI accounting through the work performed.



## Areas of Audit Focus

### Other areas of audit focus

#### Pension Liability Valuation

##### What is the risk?

The Local Authority Accounting Code of Practice and IAS19 require the Council to make extensive disclosures within its financial statements regarding its membership of the Local Government Pension Scheme administered by Hampshire County Council. The Council's pension fund deficit is a material estimated balance and the Code requires that this liability be disclosed on the Council's balance sheet. The information disclosed is based on the IAS 19 report issued to the Council by the actuary to the County Council.

Accounting for this scheme involves significant estimation and judgement and therefore management engages an actuary to undertake the calculations on their behalf. ISAs (UK) 500 and 540 require us to undertake procedures on the use of management experts and the assumptions underlying fair value estimates.

The net pension liability in the draft accounts at 31 March 2021 was £497m.

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##### What did we do?

- We:
- Liaised with the auditors of Hampshire County Council Pension Fund, to obtain assurances over the information supplied to the actuary in relation to Portsmouth City Council.
  - Assessed the work of the Pension Fund actuary (Aon Hewitt) including the assumptions they used by relying on the work of PWC - Consulting Actuaries commissioned by the National Audit Office for all local government sector auditors, and considering any relevant reviews by the EY actuarial team.
  - Reviewed and tested the accounting entries and disclosures made within the Council's financial statements in relation to IAS19.

##### What are our conclusions?

We have completed our programme of work on the pension liability valuation, including the additional procedures set out in our report to the September committee meeting.

We have no findings to report from our work.



## Areas of Audit Focus

### Other areas of audit focus

#### Accounting for Covid-19 related government grants

##### What is the risk?

The Council has received a significant level of government funding in relation to Covid-19. Whilst there is no change in the CIPFA Code or accounting standard (IFRS 15) in respect of accounting for grant funding, the emergency nature of some of the grants received and in some cases the lack of clarity on any associated restrictions and conditions, means that the Council will need to apply a greater degree of assessment and judgement to determine the appropriate accounting treatment in the 2020/21 statements.

##### What did we do and what judgements did we focus on?

We considered the Council's judgement on material grants received in relation to whether it is acting as:

- Agent, where it has determined that it is acting as an intermediary; or
- Principal, where the Council has determined that it is acting on its own behalf.

We sought to determine whether conditions were attached to the grant funding received and whether those conditions were met or not.

Considering the outcome of the above we considered the appropriateness of the accounting treatment for the grants, in particular whether the grants were correctly classified, and whether associated disclosures were also accurate.

##### What are our findings & conclusions?

Our work on COVID-19 government grants is complete subject to final documentation procedures by the audit team.

We expect to conclude that we are satisfied that the accounting treatment adopted for Covid-19 related government grants accorded with the Council's assessment of whether it was acting as agent or principal, the underlying conditions of the grant and whether those conditions had been met.



## Areas of Audit Focus

### Other areas of audit focus

#### Group Accounts Assessment

##### What is the risk?

IFRS 10, 11 and 12 set out the requirements which must be followed when assessing and disclosing group and joint arrangements. Where the Council has interests in other entities, it needs to undertake qualitative and quantitative assessments to inform its decisions as to whether group accounts are required. This is an area of potential complexity and judgement requiring regular review.

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##### What did we do?

- We:
- Asked the Council to update its qualitative and quantitative group accounts assessment for all relevant entities and critically evaluated this as early in the audit cycle as possible;
  - Undertook our own assessment and compared this with the Council's review, to identify any areas where additional work may have been required to form a conclusion on whether group accounts are required under the accounting standards.

##### What are our conclusions?

We have reviewed the Council's updated group accounts assessment, and undertaken our own review to assess whether the Council has any arrangements which would require the production of group accounts.

We are satisfied that group accounts are not required for 2020/21. This is an area which will need to be kept under review going forward.





## Areas of Audit Focus

### Other areas of audit focus

**Restatement of Comprehensive Income and Expenditure Statement, Expenditure and Funding Analysis, and related disclosure notes**

#### What is the risk?

Under CIPFA's "Telling the Story" agenda, the Council is required to disclose its income and expenditure in accordance with the structure used for internal reporting, rather than the previous presentation as prescribed by SERCOP.

The Council has changed its internal reporting structure in 2020/21, which will mean the prior period comparators in the Comprehensive Income and Expenditure Statement, the supporting Expenditure and Funding Analysis, and related disclosure notes, will need to be restated in line with the new structure.

#### What did we do?

We:

- Agreed the restated comparative figures back to the Council's prior year financial statements and supporting working papers
- Reviewed the analysis of how these figures are derived from the Council's ledger system

#### What are our conclusions?

Our work on CIES Restatement is complete.

The Comprehensive Income and Expenditure Statement, the Expenditure and Funding Analysis, and related disclosure notes, have been restated appropriately following the change to internal reporting structures, and to have no matters to report as a result of the work performed.



## 03 Audit Report



# Audit Report

## Draft audit report

### Our opinion on the financial statements

#### Opinion

We have audited the financial statements of Portsmouth City Council for the year ended 31 March 2021 under the Local Audit and Accountability Act 2014. The financial statements comprise the Movement in Reserves Statement, Comprehensive Income and Expenditure Statement, Balance Sheet, Cash Flow Statement, the related notes 1 to 42 and the Expenditure and Funding Analysis, the Collection Fund and the related notes 1 to 3 and Housing Revenue Account Income and Expenditure Statement, the Movement on the Housing Revenue Account Statement and the related notes 1 to 12. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

In our opinion the financial statements:

- give a true and fair view of the financial position of Portsmouth City Council as at 31 March 2021 and of its expenditure and income for the year then ended; and
- have been prepared properly in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

#### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report below. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard and the Comptroller and Auditor General's AGN01, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Director of Finance & Resources (Section 151 Officer)'s use of the going concern basis of accounting in the preparation of the financial statements is appropriate. Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the authority's ability to continue as a going concern for a period of at least twelve months from the date when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Director of Finance & Resources (Section 151 Officer) with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the authority's ability to continue as a going concern.

#### Other information

The other information comprises the information included in the Statement of Accounts 2020/21, other than the financial statements and our auditor's report thereon. The Director of Finance & Resources (Section 151 Officer) is responsible for the other information.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is



# Audit Report

## Our opinion on the financial statements

a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact. We have nothing to report in this regard.

### Matters on which we report by exception

We report to you if:

- in our opinion the annual governance statement is misleading or inconsistent with other information forthcoming from the audit or our knowledge of the Authority;
- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make written recommendations to the audited body under Section 24 of the Local Audit and Accountability Act 2014;
- we make an application to the court for a declaration that an item of account is contrary to law under Section 28 of the Local Audit and Accountability Act 2014;
- we issue an advisory notice under Section 29 of the Local Audit and Accountability Act 2014;
- we make an application for judicial review under Section 31 of the Local Audit and Accountability Act 2014;
- we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2021.

We have nothing to report in these respects.

### Responsibility of the Director of Finance & Resources (Section 151 Officer)

As explained more fully in the Statement of the Director of Finance & Resources (Section 151 Officer)'s Responsibilities set out on page 34, the Director of Finance & Resources (Section 151 Officer) is responsible for the preparation of the Statement of Accounts, which includes the financial statements in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, and for being satisfied that they give a true and fair view and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Director of Finance & Resources (Section 151 Officer) is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Authority either intends to cease operations, or have no realistic alternative but to do so. The Authority is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

### Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain 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 our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) 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.



# Audit Report

## Our opinion on the financial statements

### Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the entity and management.

We obtained an understanding of the legal and regulatory frameworks that are applicable to the Authority and determined that the most significant are:

- the Local Government Act 1972;
- Local Government and Housing Act 1989 (England and Wales)
- Local Government Finance Act 1988 (as amended by the Local Government Finance Act 1992)
- the Local Government Act 2003;
- the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 as amended in 2018 and 2020;
- the National Health Service Act 2006;
- the Local Audit and Accountability Act 2014; and
- the Accounts and Audit Regulations 2015.

In addition, the Authority has to comply with laws and regulations in the areas of anti-bribery and corruption, data protection, employment legislation, tax legislation, general power of competence, procurement and health & safety.

We understood how Portsmouth City Council is complying with those frameworks by understanding the incentive, opportunities and motives for non-compliance, including inquiring of management, the monitoring officer, the head of internal audit and those charged with governance and obtaining and reading documentation relating to the procedures in place to identify, evaluate and comply with laws and regulations, and whether they are aware of instances of non-compliance. We corroborated this through our reading of the Authority's committee minutes, through enquiry of employees to confirm Authority policies, and other information. Based on this understanding we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures had a focus on compliance with the accounting framework through obtaining sufficient audit evidence in line with the level of risk identified and with relevant legislation.

We assessed the susceptibility of the Authority's financial statements to material misstatement, including how fraud might occur by understanding the potential incentives and pressures for management to manipulate the financial statements, and performed procedures to understand the areas in which this would most likely arise. Based on our risk assessment procedures, we identified inappropriate capitalisation of revenue expenditure and management override of controls to be our fraud risks.

- To address our fraud risk of inappropriate capitalisation of revenue expenditure we tested the Authority's capitalised expenditure to ensure the capitalisation criteria were properly met and the expenditure was genuine.
- To address our fraud risk of management override of controls, we tested the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements; assessed accounting estimates for evidence of management bias; and evaluated the business rationale for significant unusual transactions.



# Audit Report

## Our opinion on the financial statements

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report

### Scope of the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We have undertaken our review in accordance with the Code of Audit Practice, having regard to the guidance on the specified reporting criteria issued by the Comptroller and Auditor General in April 2021, as to whether Portsmouth City Council had proper arrangements for financial sustainability, governance and improving economy, efficiency and effectiveness. The Comptroller and Auditor General determined these criteria as those necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether Portsmouth City Council put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2021.

We planned our work in accordance with the Code of Audit Practice. Based on our risk assessment, we undertook such work as we considered necessary to form a view on whether, in all significant respects, Portsmouth City Council had put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

### Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate until we have completed the work necessary to issue our assurance statement in respect of the Authority's Whole of Government Accounts consolidation pack. We are satisfied that this work does not have a material effect on the financial statements or on our value for money conclusion.

Until we have completed these procedures we are unable to certify that we have completed the audit of the accounts in accordance with the requirements of the Local Audit and Accountability Act 2014 and the Code of Audit Practice issued by the National Audit Office.

### Use of our report

This report is made solely to the members of Portsmouth City Council, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014 and for no other purpose, as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

*Helen Thompson (Key Audit Partner)*  
*Ernst & Young LLP (Local Auditor)*  
*Southampton*





## 04 Audit Differences



# Audit Differences

In the normal course of any audit, we identify misstatements between amounts we believe should be recorded in the financial statements and the disclosures and amounts actually recorded. These differences are classified as “known” or “judgemental”. Known differences represent items that can be accurately quantified and relate to a definite set of facts or circumstances. Judgemental differences generally involve estimation and relate to facts or circumstances that are uncertain or open to interpretation.

## Summary of adjusted and unadjusted differences

There are no adjusted differences above our performance materiality level of £9.14m, arising from work completed to date.

In addition we highlight the following misstatements to the financial statements and/or disclosures which were not corrected by management. We request that these uncorrected misstatements be corrected or a rationale as to why they are not corrected be considered and approved by the Governance and Audit and Standards Committee and provided within the Letter of Representation. Narrative detail on these differences is included in Section 2.

Uncorrected misstatements 31 March 2021 (£'000)	Effect on the current period:		Net assets (Decrease)/Increase			
	OCI Debit/(Credit)	CIES Debit/(Credit)	Assets current Debit/ (Credit)	Assets non current Debit/ (Credit)	Liabilities current Debit/ (Credit)	Liabilities non- current Debit/ (Credit)
Errors						
<b>Factual differences:</b>						
▸ Land and Buildings Existing Use Value Valuations: Difference arising from internal area miscalculation	1,472			(1,472)		
▸ Land and Buildings Depreciated Replacement Cost Valuations: Difference arising from incorrect asset life	(1,708)			1,708		
<b>Total Factual Differences</b>	<b>(236)</b>			<b>236</b>		
<b>Projected differences:</b>						
▸ Land and Buildings Depreciated Replacement Cost Valuations: Difference arising from omission of professional fees	(4,073)			4,073		
▸ Land and Buildings Depreciated Replacement Cost Valuations: Difference arising from inclusion of contingency	3,969			(3,969)		
<b>Total Projected Differences</b>	<b>(104)</b>			<b>104</b>		
<b>Judgmental differences:</b>						
▸ Investment Property Valuations: Difference arising from yield used (projected)		(964)		964		
<b>Total Judgmental Differences</b>		<b>(964)</b>		<b>964</b>		



## Audit Differences

### Summary of adjusted and unadjusted differences

A small number of other amendments were made to disclosures appearing in the financial statements as a result of our work.

Should any further adjusted and unadjusted misstatements be identified, we will update the Governance and Audit and Standards Committee at the meeting on 21 January 2022.





## 05 Value for Money



# Value for money

## The Council's responsibilities for value for money (VFM)

The Council is required to maintain an effective system of internal control that supports the achievement of its policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at its disposal.

As part of the material published with its financial statements, the Council is required to bring together commentary on its governance framework and how this has operated during the period in an annual governance statement. In preparing its annual governance statement, the Council tailors the content to reflect its own individual circumstances, consistent with the requirements set out in the CIPFA Code of Practice on Local Authority Accounting. This includes a requirement to provide commentary on its arrangements for securing value for money from their use of resources.

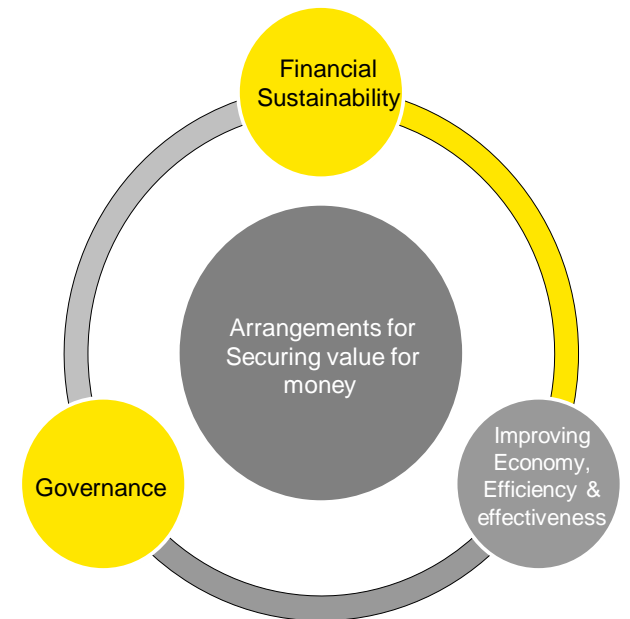
## Risk assessment

At the Governance and Audit and Standards Committee meeting held on 16 July 2021, we provided a verbal update that based on the planning procedures, we had not identified any significant weaknesses in your arrangements.

We have revisited our risk assessment and have not identified any additional risks.

## Status of our VFM work

We have completed our planned VFM procedures and have no matters to report by exception in the auditor's report (see Section 03). We plan to issue the VFM commentary as part of issuing the Auditor's Annual Report.







## 06 Other reporting issues

## Other reporting issues

### Consistency of other information published with the financial statements, including the Annual Governance Statement

We must give an opinion on the consistency of the financial and non-financial information in the Statement of Accounts 2020/21 with the audited financial statements

We must also review the Annual Governance Statement for completeness of disclosures, consistency with other information from our work, and whether it complies with relevant guidance.

Financial information in the Statement of Accounts 2020/21 and published with the financial statements is consistent with the audited financial statements.

We have reviewed the Annual Governance Statement and can confirm it is consistent with other information from our audit of the financial statements and that we have no other matters to report.

### Whole of Government Accounts

Alongside our work on the financial statements, we also review and report to the National Audit Office on your Whole of Government Accounts return. The extent of our review, and the nature of our report, is specified by the National Audit Office.

We will perform the procedures required by the National Audit Office (NAO) on the Whole of Government Accounts submission following the completion of the financial statements audit and provide an update to the Committee following completion of this work. Currently, the issue of the template submission by HM Treasury has been delayed, meaning that this work cannot be performed until it is. The audit certificate will be issued once this work is complete.

# Other reporting issues

### Other powers and duties

We have a duty under the Local Audit and Accountability Act 2014 to consider whether to report on any matter that comes to our attention in the course of the audit, either for the Council to consider it or to bring it to the attention of the public (i.e. "a report in the public interest"). We did not identify any issues which required us to issue a report in the public interest.

We also have a duty to make written recommendations to the Council, copied to the Secretary of State, and take action in accordance with our responsibilities under the Local Audit and Accountability Act 2014. We did not identify any issues.

### Other matters

As required by ISA (UK&I) 260 and other ISAs specifying communication requirements, we must tell you significant findings from the audit and other matters if they are significant to your oversight of the Council's financial reporting process. They include the following:

- Significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures;
- Any significant difficulties encountered during the audit;
- Any significant matters arising from the audit that were discussed with management;
- Written representations we have requested;
- Expected modifications to the audit report;
- Any other matters significant to overseeing the financial reporting process;
- Findings and issues around the opening balance on initial audits (if applicable);
- Related parties;
- External confirmations;
- Going concern; and
- Consideration of laws and regulations.

We have nothing to report.





07

## Assessment of Control Environment



# Assessment of Control Environment

## Financial controls

It is the responsibility of the Council to develop and implement systems of internal financial control and to put in place proper arrangements to monitor their adequacy and effectiveness in practice. Our responsibility as your auditor is to consider whether the Council has put adequate arrangements in place to satisfy itself that the systems of internal financial control are both adequate and effective in practice.

As part of our audit of the financial statements, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. As we have adopted a fully substantive approach, we have therefore not tested the operation of controls.

Although our audit was not designed to express an opinion on the effectiveness of internal control we are required to communicate to you significant deficiencies in internal control.

We have not identified any significant deficiencies in the design or operation of an internal control that might result in a material misstatement in your financial statements of which you are not aware.

We considered whether circumstances arising from COVID-19 resulted in a change to the overall control environment of effectiveness of internal controls, for example due to significant staff absence or limitations as a result of working remotely. We identified no issues which we wish to bring to your attention/details of issues noted.





## 08 Data Analytics





# Use of Data Analytics in the Audit

## Data analytics – Income & expenditure testing, payroll testing and journals

### Analytics Driven Audit

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#### Data analytics

We used our data analysers to enable us to capture entire populations of your financial data. These analysers:

- ▶ Help identify specific exceptions and anomalies which can then be the focus of our substantive audit tests; and
- ▶ Give greater likelihood of identifying errors than traditional, random sampling techniques.

In 2020/21, our use of these analysers in the Council's audit included testing selecting samples for general income and expenditure testing, testing payroll costs, to identify and focus our testing on those entries we deem to have the highest inherent risk to the audit.

We capture the data through our formal data requests and the data transfer takes place on a secured EY website. These are in line with our EY data protection policies which are designed to protect the confidentiality, integrity and availability of business and personal information.

#### Journal Entry Analysis

We obtain downloads of all financial ledger transactions posted in the year. We perform completeness analysis over the data, reconciling the sum of transactions to the movement in the trial balances and financial statements to ensure we have captured all data. Our analysers then review and sort transactions, allowing us to more effectively identify and test journals that we consider to be higher risk, as identified in our audit planning report.

#### Payroll Analysis

We also use our analysers in our payroll testing. We obtain all payroll transactions posted in the year from the payroll system and perform completeness analysis over the data, including reconciling the total amount to the General Ledger trial balance. We then analyse the data against a number of specifically designed procedures. These include analysis of payroll costs by month to identify any variances from established expectations, as well as more detailed transactional interrogation.



09

## Independence

## Relationships, services and related threats and safeguards

The FRC Ethical Standard requires that we provide details of all relationships between Ernst & Young (EY) and your Authority, senior management and its affiliates, including all services provided by us and our network to your Authority, senior management and its affiliates, and other services provided to other known connected parties that we consider may reasonably be thought to bear on the our integrity or objectivity, including those that could compromise independence and the related safeguards that are in place and why they address the threats.

There are no relationships from 1<sup>st</sup> April 2020 to the date of this report, which we consider may reasonably be thought to bear on our independence and objectivity.

### Services provided by Ernst & Young

The table below sets out a summary of the fees for the year ended 31 March 2021 in line with the disclosures set out in FRC Ethical Standard and in statute. As at the date of this report, there are no future services which have been contracted and no written proposal to provide non-audit services has been submitted.

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	Final fee 2020/21	Planned fee 2020/21	Final Fee 2019/20
	£	£	£
Scale Fee - Code work	115,067	115,067	115,067
2019/20 fee variation determined by PSAA (Note 1)			48,112 (1)
2020/21 PSAA expected additional minimal core fees (Note 2):			
• VFM	TBC	10,000 to 19,000	
• ISA 540 accounting estimates		4,400	
2020/21 proposed fee variation - other (Note 3)	TBC		
<b>Total fees</b>	<b>TBC</b>	<b>129,467 to 138,467</b>	<b>163,179</b>

*All fees exclude VAT*

(1) In order to meet regulatory and compliance audit requirements not present in the market at the time of our most recent bid to PSAA, we assessed that the recurrent cost of additional requirements to carry out our audit should increase by £80,727. We also submitted an in-year fee variation of £30,020. PSAA has determined the total fee variation across both elements for 2019/20 as £48,112. We expect similar costs in nature in 2020/21 and subsequent years. However, PSAA has stated that this will need to be determined each year.

(2) Note 2 - In August 2021, PSAA published 'Additional information for 2020/21 audit fees'. PSAA commissioned external independent technical research for setting standardised fee variations to assess the expected impact on audit work programmes of a range of new and updated audit requirements. PSAA determined a minimum range for VFM (£10k-£19k) and a minimum amount for ISA540 (£4.4k).

(3) Note 3 - Any further additional fees (over and above VFM and ISA540) for 2020/21 will be communicated to the Director of Finance and Resources following the completion of the audit.

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

## Other communications

### EY Transparency Report 2021

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

Details of the key policies and processes in place within EY for maintaining objectivity and independence can be found in our annual Transparency Report which the firm is required to publish by law. The most recent version of this Report is for the year end 30 June 2021:

[EY UK 2021 Transparency Report | EY UK](#)





# 10 Appendices





## Appendix A

# Audit approach update

We summarise below our approach to the audit of the balance sheet and any changes to this approach from the prior year audit.

Our audit procedures are designed to be responsive to our assessed risk of material misstatement at the relevant assertion level. Assertions relevant to the balance sheet include:

- ▶ Existence: An asset, liability and equity interest exists at a given date
- ▶ Rights and Obligations: An asset, liability and equity interest pertains to the entity at a given date
- ▶ Completeness: There are no unrecorded assets, liabilities, and equity interests, transactions or events, or undisclosed items
- ▶ Valuation: An asset, liability and equity interest is recorded at an appropriate amount and any resulting valuation or allocation adjustments are appropriately recorded
- ▶ Presentation and Disclosure: Assets, liabilities and equity interests are appropriately aggregated or disaggregated, and classified, described and disclosed in accordance with the applicable financial reporting framework. Disclosures are relevant and understandable in the context of the applicable financial reporting framework




All material figures in the Balance Sheet have been substantively tested, as set out in our Audit Planning Report of July 2021. This is consistent with our audit approach in the prior year.

There were no significant changes to our audit approach apart from the additional work we were required to undertake to address the requirements of the new auditing standard on accounting estimates. This primarily impacted out audit procedures on:

- The revaluation of land and buildings classified as Property, Plant and Equipment (PPE), Investment Property (IP) and Surplus Assets.
- Pension liability and asset valuation.

## Appendix B

# Summary of communications




Date 	Nature 	Summary 
Throughout the year	Meetings, calls and emails.	The Associate Partner, Manager and Assistant Manager have been in regular contact with the Director of Finance & Resources (Section 151 Officer) and the finance team in respect of the Council's risks, accounts closedown and the audit approach.
09 September 2021	Meeting	The Associate Partner and Manager met with the Deputy Section 151 Officer to discuss an emerging issue relating to the audit of the IAS19 pension liability, and the status of our work on Property, Plant and Equipment valuations
All Governance and Audit and Standards Committee meetings held in the year	Committee attendance	<p>The Associate Partner and Manager/Assistant Manager have attended the meetings of the Governance and Audit and Standards Committee held throughout the financial year and to the date of issue of this report. The financial statements briefing meeting was also attended.</p> <p>Specific reports issued and communications with the Committee are detailed in Appendix C.</p>

In addition to the above specific meetings the audit team met with the finance team multiple times throughout the audit to discuss audit progress and findings.

## Appendix C

# Required communications with the Governance and Audit and Standards Committee

There are certain communications that we must provide to the Audit Committees of UK clients. We have detailed these here together with a reference of when and where they were covered:

Our Reporting to you		
Required communications	 What is reported?	  When and where
Terms of engagement	Confirmation by the Governance and Audit and Standards Committee of acceptance of terms of engagement as written in the engagement letter signed by both parties.	The statement of responsibilities serves as the formal terms of engagement between the PSAA's appointed auditors and audited bodies
Our responsibilities	Reminder of our responsibilities as set out in the engagement letter.	Audit planning report- 16 July 2021
Planning and audit approach	Communication of the planned scope and timing of the audit, any limitations and the significant risks identified.	Audit planning report - 16 July 2021
Significant findings from the audit	<ul style="list-style-type: none"> <li>▶ Our view about the significant qualitative aspects of accounting practices including accounting policies, accounting estimates and financial statement disclosures</li> <li>▶ Significant difficulties, if any, encountered during the audit</li> <li>▶ Significant matters, if any, arising from the audit that were discussed with management</li> <li>▶ Written representations that we are seeking</li> <li>▶ Expected modifications to the audit report</li> <li>▶ Other matters if any, significant to the oversight of the financial reporting process</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022

## Appendix C

		Our Reporting to you
Required communications	What is reported?	When and where
Going concern	<p>Events or conditions identified that may cast significant doubt on the entity's ability to continue as a going concern, including:</p> <ul style="list-style-type: none"> <li>▶ Whether the events or conditions constitute a material uncertainty</li> <li>▶ Whether the use of the going concern assumption is appropriate in the preparation and presentation of the financial statements</li> <li>▶ The adequacy of related disclosures in the financial statements</li> </ul>	No conditions or events were identified, either individually or together to raise any doubt about Portsmouth City Council's ability to continue for at least 12 months from the date of our report.
Misstatements	<ul style="list-style-type: none"> <li>▶ Uncorrected misstatements and their effect on our audit opinion</li> <li>▶ The effect of uncorrected misstatements related to prior periods</li> <li>▶ A request that any uncorrected misstatement be corrected</li> <li>▶ Material misstatements corrected by management</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Subsequent events	<ul style="list-style-type: none"> <li>▶ Enquiry of the Governance and Audit and Standards Committee where appropriate regarding whether any subsequent events have occurred that might affect the financial statements.</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Fraud	<ul style="list-style-type: none"> <li>▶ Enquiries of the Governance and Audit and Standards Committee to determine whether they have knowledge of any actual, suspected or alleged fraud affecting the Council</li> <li>▶ Any fraud that we have identified or information we have obtained that indicates that a fraud may exist</li> <li>▶ Unless all of those charged with governance are involved in managing the Council, any identified or suspected fraud involving:               <ol style="list-style-type: none"> <li>Management;</li> <li>Employees who have significant roles in internal control; or</li> <li>Others where the fraud results in a material misstatement in the financial statements.</li> </ol> </li> <li>▶ The nature, timing and extent of audit procedures necessary to complete the audit when fraud involving management is suspected</li> <li>▶ Any other matters related to fraud, relevant to Governance and Audit and Standards Committee responsibility.</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022

## Appendix C

		Our Reporting to you
Required communications	What is reported?	When and where
Related parties	<p>Significant matters arising during the audit in connection with the Council's related parties including, when applicable:</p> <ul style="list-style-type: none"> <li>▶ Non-disclosure by management</li> <li>▶ Inappropriate authorisation and approval of transactions</li> <li>▶ Disagreement over disclosures</li> <li>▶ Non-compliance with laws and regulations</li> <li>▶ Difficulty in identifying the party that ultimately controls the Council</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Independence	<p>Communication of all significant facts and matters that bear on EY's, and all individuals involved in the audit, objectivity and independence.</p> <p>Communication of key elements of the audit engagement partner's consideration of independence and objectivity such as:</p> <ul style="list-style-type: none"> <li>▶ The principal threats</li> <li>▶ Safeguards adopted and their effectiveness</li> <li>▶ An overall assessment of threats and safeguards</li> <li>▶ Information about the general policies and process within the firm to maintain objectivity and independence</li> </ul> <p>Communications whenever significant judgments are made about threats to objectivity and independence and the appropriateness of safeguards put in place.</p>	Audit Plan - 16 July 2021 and Audit results report - 24 September 2021 and 21 January 2022
External confirmations	<ul style="list-style-type: none"> <li>▶ Management's refusal for us to request confirmations</li> <li>▶ Inability to obtain relevant and reliable audit evidence from other procedures.</li> </ul>	We have received all requested confirmations

## Appendix C

		Our Reporting to you
Required communications	What is reported?	When and where
Consideration of laws and regulations	<ul style="list-style-type: none"> <li>Subject to compliance with applicable regulations, matters involving identified or suspected non-compliance with laws and regulations, other than those which are clearly inconsequential and the implications thereof. Instances of suspected non-compliance may also include those that are brought to our attention that are expected to occur imminently or for which there is reason to believe that they may occur.</li> <li>Enquiry of the Governance and Audit and Standards Committee into possible instances of non-compliance with laws and regulations that may have a material effect on the financial statements and that the Committee may be aware of.</li> </ul>	We have asked management and those charged with governance. We have not identified any material instances or non-compliance with laws and regulations.
Significant deficiencies in internal controls identified during the audit	<ul style="list-style-type: none"> <li>Significant deficiencies in internal controls identified during the audit.</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Written representations we are requesting from management and/or those charged with governance	<ul style="list-style-type: none"> <li>Written representations we are requesting from management and/or those charged with governance</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Material inconsistencies or misstatements of fact identified in other information which management has refused to revise	<ul style="list-style-type: none"> <li>Material inconsistencies or misstatements of fact identified in other information which management has refused to revise</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Auditors report	<ul style="list-style-type: none"> <li>Any circumstances identified that affect the form and content of our auditor's report</li> </ul>	Audit results report - 24 September 2021 and 21 January 2022
Fee Reporting	<ul style="list-style-type: none"> <li>Breakdown of fee information when the audit planning report is agreed</li> <li>Breakdown of fee information at the completion of the audit</li> <li>Any non-audit work</li> </ul>	Audit Plan - 16 July 2021 and Audit results report - 24 September 2021 and 21 January 2022

# Management representation letter

## Provisional Management Representation Letter

This letter of representations is provided in connection with your audit of the financial statements of Portsmouth City Council (“the Council”) for the year ended 31 March 2021. We recognise that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the financial statements give a true and fair view of the financial position of Portsmouth City Council as of 31 March 2021 and of its income and expenditure for the year then ended in accordance with CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

We understand that the purpose of your audit of our financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing (UK), which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

### A. Financial Statements and Financial Records

1. We have fulfilled our responsibilities, under the relevant statutory authorities, for the preparation of the financial statements in accordance with the Accounts and Audit Regulations 2015 and CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
2. We acknowledge, as members of management of the Council, our responsibility for the fair presentation of the financial statements. We believe the financial statements referred to above give a true and fair view of the financial position, financial performance (or results of operations) and cash flows of the [Council] in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom

2020/21, and are free of material misstatements, including omissions. We have approved the financial statements.

3. The significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.
4. As members of management of the Council, we believe that the Council has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, that are free from material misstatement, whether due to fraud or error. We have disclosed to you any significant changes in our processes, controls, policies and procedures that we have made to address the effects of the COVID-19 pandemic on our system of internal controls.
5. We believe that the effects of any unadjusted audit differences, summarised in the accompanying schedule, accumulated by you during the current audit and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. We have not corrected these differences identified by and brought to the attention from the auditor because [\[specify reasons for not correcting misstatement\]](#).

### B. Non-compliance with law and regulations, including fraud

1. We acknowledge that we are responsible to determine that the Council's activities are conducted in accordance with laws and regulations and that we are responsible to identify and address any non-compliance with applicable laws and regulations, including fraud.
2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
4. We have no knowledge of any identified or suspected non-compliance with laws or regulations, including fraud that may have affected the Council (regardless of the source or form and including without limitation, any allegations by “whistleblowers”), including non-compliance matters:

# Management representation letter

## Provisional Management Representation Letter

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- involving financial statements;
- related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the Council's financial statements;
- related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Council's activities, its ability to continue to operate, or to avoid material penalties;
- involving management, or employees who have significant roles in internal controls, or others; or
- in relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others.

### C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:
  - Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
  - Additional information that you have requested from us for the purpose of the audit; and
  - Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
2. All material transactions have been recorded in the accounting records and all material transactions, events and conditions are reflected in the financial statements, including those related to the COVID-19 pandemic.
3. We have made available to you all minutes of the meetings of the Full Council and the Cabinet (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year to the most recent meeting on the following dates:
  - Full Council: 7 December 2021
  - Cabinet: 11 January 2022

4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Council's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the year end. These transactions have been appropriately accounted for and disclosed in the financial statements.
5. We believe that the methods, significant assumptions and the data we used in making accounting estimates and related disclosures are appropriate and consistently applied to achieve recognition, measurement and disclosure that is in accordance with the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
6. We believe that the significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.
7. We have disclosed to you, and the Council has complied with, all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
8. From the date of our last management representation letter at 14 January 2021 through the date of this letter we have disclosed to you any unauthorized access to our information technology systems that either occurred or to the best of our knowledge is reasonably likely to have occurred based on our investigation, including of reports submitted to us by third parties (including regulatory agencies, law enforcement agencies and security consultants), to the extent that such unauthorized access to our information technology systems is reasonably likely to have a material impact to the financial statements, in each case or in the aggregate.



# Management representation letter

## Provisional Management Representation Letter

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### D. Liabilities and Contingencies

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the financial statements.
2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
3. We have recorded and/or disclosed, as appropriate, all liabilities related to litigation and claims, both actual and contingent, and have disclosed in the financial statements all guarantees that we have given to third parties.

### E. Going Concern

1. Note 1 to the financial statements discloses all the matters of which we are aware that are relevant to the Council's ability to continue as a going concern, including significant conditions and events, our plans for future action, and the feasibility of those plans.

### F. Subsequent Events

1. Other than as described in Note 6 to the financial statements, there have been no events, including events related to the COVID-19 pandemic, subsequent to year end which require adjustment of or disclosure in the financial statements or notes thereto.

### G. Other information

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the Narrative Statement, Financial Statements 2020-21 - Commentary and Annual Governance Statement .
2. We confirm that the content contained within the other information is consistent with the financial statements.

### H. Use of the Work of a Specialist

1. We agree with the findings of the specialists that we engaged to evaluate the valuation of property, plant & equipment and investment property, the valuation of pension liabilities and assets, and the valuation of the business rates appeals provision, and have adequately considered the qualifications of the specialists in determining the amounts and disclosures included in the financial statements and the underlying accounting records. We did not give or cause any instructions to be given to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an effect on the independence or objectivity of the specialists.

### I. Estimates

#### Revaluation of Property, Plant and Equipment (PPE) and Investment Property (IP), and Pension Liability Valuation

1. We confirm that the significant judgments made in performing the revaluation of PPE and IP, and in performing the pension liability valuation have taken into account all relevant information and the effects of the COVID-19 pandemic which we are aware.
2. We believe that the selection or application of the methods, assumptions and data used by us have been consistently and appropriately applied in performing the revaluation of PPE and IP, and in performing the pension liability valuation.
3. We confirm that the significant assumptions used in performing the revaluation of PPE and IP, and in performing the pension liability valuation appropriately reflect our intent and ability to carry out the revaluation on behalf of the entity.

# Management representation letter

## Provisional Management Representation Letter

4. We confirm that the disclosures made in the financial statements with respect to the accounting estimates, including those describing estimation uncertainty and the effects of the COVID-19 pandemic, are complete and are reasonable in the context of the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.
5. We confirm that appropriate specialized skills or expertise has been applied in undertaking the revaluation of PPE and IP, and in performing the pension liability valuation.
6. We confirm that no adjustments are required to the accounting estimate(s) and disclosures in the financial statements, including due to the COVID-19 pandemic.

### J. Retirement benefits

1. On the basis of the process established by us and having made appropriate enquiries, we are satisfied that the actuarial assumptions underlying the scheme liabilities are consistent with our knowledge of the business. All significant retirement benefits and all settlements and curtailments have been identified and properly accounted for.

I confirm that this letter has been discussed with the Chairman of the Governance and Audit and Standards Committee on <insert date>

*Yours faithfully,*

Name: Chris Ward  
Position: Director of Finance and Resources and Section 151 Officer

Name: Cllr. Leo Madden  
Position: Chairman of the Governance and Audit and Standards Committee

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