

## Finance

INTERIM HEAD OF SERVICE: SIMON HEWINGS



Listening Learning Leading

Kevin Suter  
Associate Partner  
Ernst & Young LLP  
Apex Plaza  
Forbury Road  
Reading  
RG1 1YE

**Contact officer: Simon Hewings**  
Simon.hewings@southoxon.gov.uk  
Tel: 01235 422499

Textphone users add 18001 before you dial

Your reference:  
Our reference

27 January 2020

Dear Kevin

This letter of representations is provided in connection with your audit of the financial statements of South Oxfordshire District Council ("the Council") for the year ended 31 March 2019. 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 South Oxfordshire District Council as of 31 March 2019 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 2018/19.

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 2018/19.<sup>1</sup>

<sup>1</sup> ISA (UK) 580.10



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 2018/19, 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 2018/19, that are free from material misstatement, whether due to fraud or error.<sup>2</sup>
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.<sup>3</sup> We have not corrected these differences identified by and brought to the attention from the auditor because we do not consider that the impact of doing so would be material to the reader of the accounts.

## **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.<sup>4</sup>
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.<sup>5</sup>
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:
  - involving financial statements;

---

<sup>2</sup> ISA (UK) 210.6(b)(ii)

<sup>3</sup> ISA (UK) 450.14

<sup>4</sup> ISA (UK) 240.39(a)

<sup>5</sup> ISA (UK) 240.39(b)



- 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.<sup>6</sup>

### 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.<sup>7</sup>
2. All material transactions have been recorded in the accounting records and are reflected in the financial statements.<sup>8</sup>
3. We have made available to you all minutes of the meetings of the Council and committees (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through the year 2018/19 to the most recent meeting on the following date: *[list date]*.
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.<sup>9</sup>

<sup>6</sup> ISA (UK) 240.39(c),(d), and ISA (UK) 250A.16

<sup>7</sup> ISA (UK) 580.11(a), ISA (UK) 210.6(b)(iii)

<sup>8</sup> ISA (UK) 580.11(b)

<sup>9</sup> ISA (UK) 550.26



5. We believe that the significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.<sup>10</sup>
6. 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.

#### **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.<sup>11</sup>
3. We have recorded and/or disclosed, as appropriate, all liabilities related litigation and claims, both actual and contingent, and have disclosed in Note 25 to the financial statements all guarantees that we have given to third parties.<sup>12</sup>

#### **E. Subsequent Events**

1. Other than those described in Note 31 to the financial statements, there have been no events subsequent to period end which require adjustment of or disclosure in the financial statements or notes thereto.<sup>13</sup>

#### **F. Other information<sup>14</sup>**

1. We acknowledge our responsibility for the preparation of the other information. The other information comprises the Narrative Statement; the Statement of Responsibilities for the Statement of Accounts; the Glossary of Terms; and the Annual Governance Statement.
2. We confirm that the content contained within the other information is consistent with the financial statements.

#### **G. Reserves**

1. We have properly recorded or disclosed in the financial statements the useable and unusable reserves.

---

<sup>10</sup> ISA (UK) 540.22

<sup>11</sup> ISA (UK) 501.12

<sup>12</sup> ISA (UK) 501.12

<sup>13</sup> ISA (UK) 560.9

<sup>14</sup> Other information is financial and non-financial information (other than the financial statements and the auditor's report thereon) included in an entity's annual report.



## **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 and Equipment, actuarial valuation of Pension Fund liabilities and the estimation of the provision for NDR appeals 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. Pensions Liability, PPE Valuations and NDR Appeals Estimates**

1. We believe that the measurement processes, including related assumptions and models, used to determine the accounting estimate(s) have been consistently applied and are appropriate in the context of the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.
2. We confirm that the significant assumptions used in making the CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17 appropriately reflect our intent and ability to carry out specific courses of action on behalf of the entity.
3. We confirm that the disclosures made in the financial statements with respect to the accounting estimate(s) are complete and made in accordance CIPFA LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2016/17.
4. We confirm that no adjustments are required to the accounting estimate(s) and disclosures in the financial statements due to subsequent events.

## **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.

Yours sincerely

---

(Interim Head of Finance and Section 151 Officer)

---

(Chairman of Audit & Governance Committee)

### Schedule of Unadjusted Audit Differences

	<b>Liabilities Non-Current Debit/ (Credit) £</b>	<b>Effect on the Current Period OCI Debit/ (Credit) £</b>
<i>Difference that would arise on recognition of GMP equalisation liabilities:</i>		
<b>Past service cost</b>		<b>492,000</b>
<b>Pensions Liability</b>	<b>(492,000)</b>	
<i>Difference that would arise on correction of unsupported adjustments between actuary report and Authority workings:</i>		
<b>Past service cost</b>		<b>(291,000)</b>
<b>Pensions Accrual</b>	<b>291,000</b>	