

The Audit Findings for Westminster City Council

Year ended 31 March 2016

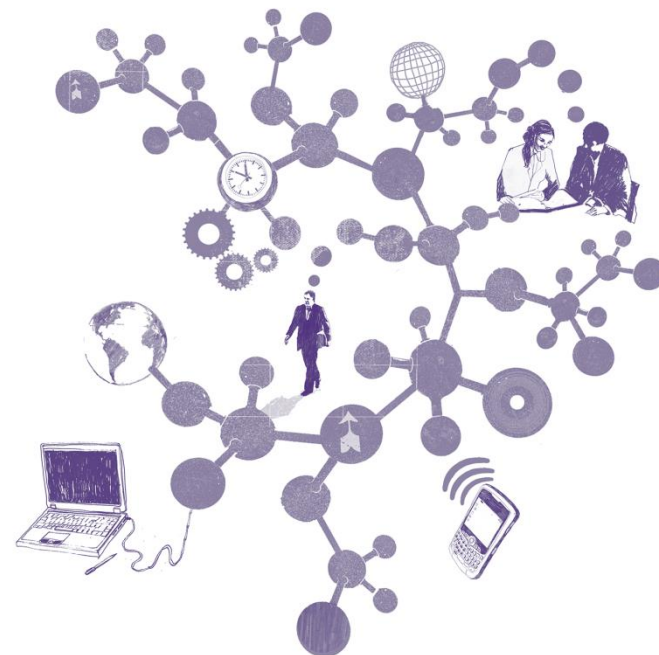
July 2016 (updated from May 2016 version)

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14 July 2016

Dear Sirs

Audit Findings for Westminster City Council for the year ending 31 March 2016

This Audit Findings report highlights the significant findings arising from the audit for the benefit of those charged with governance (in the case of Westminster City Council, the Audit and Performance Committee), as required by International Standard on Auditing (UK & Ireland) 260, the Local Audit and Accountability Act 2014 and the National Audit Office Code of Audit Practice. Its contents have been discussed with management.

As auditors we are responsible for performing the audit, in accordance with International Standards on Auditing (UK & Ireland), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance. The audit of the financial statements does not relieve management or those charged with governance of their responsibilities for the preparation of the financial statements.

The contents of this report relate only to those matters which came to our attention during the conduct of our normal audit procedures which are designed primarily for the purpose of expressing our opinion on the financial statements. Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify any control weaknesses, we will report these to you. In consequence, our work cannot be relied upon to disclose defalcations or other irregularities, or to include all possible improvements in internal control that a more extensive special examination might identify. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

We would like to take this opportunity to record our appreciation for the kind assistance provided by the finance team and other staff during our audit.

Yours sincerely

Paul Dossett

Engagement lead

Chartered Accountants

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Section 1: Executive summary

01. Executive summary

02. Audit findings

03. Value for Money

04. Other statutory powers and duties

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06. Communication of audit matters

Purpose of this report

This report highlights the key issues affecting the results of Westminster City Council ('the Council') and the preparation of the Council's financial statements for the year ended 31 March 2016. It is also used to report our audit findings to management and those charged with governance in accordance with the requirements of International Standard on Auditing (UK & Ireland) 260, and the Local Audit and Accountability Act 2014 ('the Act').

Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion, the Council's financial statements give a true and fair view of the financial position of the Council and its income and expenditure for the year and whether they have been properly prepared in accordance with the CIPFA Code of Practice on Local Authority Accounting. .

We are also required consider other information published together with the audited financial statements, whether it is consistent with the financial statements and in line with required guidance.

We are required to carry out sufficient work to satisfy ourselves on whether the Council has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources ('the value for money (VFM) conclusion').

Auditor Guidance Note 7 (AGN07) clarifies our reporting requirements in the Code and the Act. For audited bodies, other than health service bodies, we are required to provide a conclusion that in all significant respects, the audited body has (or has not) put in place proper arrangements to secure value for money through economic, efficient and effective use of its resources for the relevant period.

The Act also details the following additional powers and duties for local government auditors, which we are required to report to you if applied:

- a public interest report if we identify any matter that comes to our attention in the course of the audit that in our opinion should be considered by the Council or brought to the public's attention (section 24 of the Act);

- written recommendations which should to be considered by the Council and responded to publicly (section 24 of the Act);
- application to the court for a declaration that an item of account is contrary to law (section 28 of the Act);
- issue of an advisory notice (section 29 of the Act); and
- application for judicial review (section 31 of the Act)

We are also required to give electors the opportunity to raise questions about the accounts and consider and decide upon objections received in relation to the accounts under sections 26 and 27 of the Act.

Introduction

In the conduct of our audit we have changed our audit approach which we communicated to you in our Audit Plan dated 3 February 2016. As part of the financial statements planning we identified the provision for national non-domestic rates as an **additional** significant risk and enhanced the level of testing planned on the provision in line with the ISA requirements. The increased level of risk following receipt of the draft accounts was due to the material movement in the NNDR provision.

Our audit is substantially complete although we are finalising our procedures in the following areas:

- reviewing the final version of the accounts
- obtaining and reviewing the management letter of representation
- updating our post balance sheet events review, to the date of signing the opinion.

We received draft financial statements on 9 April 2016 which is nearly three months ahead of the statutory deadline for Local Authorities. We received the majority of the working papers for the commencement of our audit visit. The Council has proactively managed the risks arising from the managed services contract during the year by carrying out extensive sample testing of the transactions and working with BT to correct data issues and strengthen the controls in the ledger. This enabled them to meet the early close timetable.

Key audit and financial reporting issues

Financial statements opinion

We have identified no adjustments affecting the Council's reported financial position (details are recorded in section two of this report). The draft and audited financial statements for the year ended 31 March 2016 recorded net expenditure of £283,563k. We have recommended a small number of disclosure amendments to improve the presentation of the financial statements.

The key messages arising from our audit of the Council's financial statements are:

- the Council prepared a good quality set of de-cluttered draft accounts for audit by 9 April 2016
- the supporting working papers were of a high quality
- as part of the accounts preparation a small number of entries in the draft financial statements were not entered in to the ledger; the Council processed these journals before the final version of the accounts was produced
- disclosure around the critical judgements made by management in preparing the financial statements have been enhanced in the final version.

Further details are set out in section two of this report.

We anticipate providing a unqualified audit opinion in respect of the financial statements (see Appendix B).

Other financial statement responsibilities

As well as an opinion on the financial statements, we are required to give an opinion on whether other information published together with the audited financial statements is consistent with the financial statements. This includes:

- whether the Narrative Report meets the requirements of the CIPFA Code and is consistent with the audited financial statements
- if the Annual Governance Statement does not meet the disclosure requirements set out in the CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit.

Controls

Roles and responsibilities

The Council's management is responsible for the identification, assessment, management and monitoring of risk, and for developing, operating and monitoring the system of internal control.

Our audit is not designed to test all internal controls or identify all areas of control weakness. However, where, as part of our testing, we identify any control weaknesses, we report these to the Council.

Findings

We draw your attention in particular to control issues identified in relation to:

- cross entity journals for Westminster City Council have been posted during 2015/16 (which balance across the tri-borough ledger but have to be reconciled back to the impact on Westminster)
- a number of journals have not been processed through the ledger before the draft accounts were provided to audit

Further details are provided within section two of this report.

Value for Money

Based on our review, we are satisfied that, in all significant respects, the Council had proper arrangements in place to secure economy, efficiency and effectiveness in its use of resources.

Further detail of our work on Value for Money are set out in section three of this report.

Other statutory powers and duties

During the course of our audit we were informed of an issue that has given rise to an objection under the Audit Commission Act 1998 in respect of prior year financial statements that have not yet been formally closed.

We worked with a local elector to decide upon an objection relating to the 2012/13 to 2014/15 financial statements and formally closed these audit years in May 2016.

As at 11 July 2016, we have not received any formal objections to the 2015/16 financial statements. We will update you on the conclusion reached at the July Audit and Performance Committee.

Further details of our work on other statutory powers and duties is set out in section four of this report.

The way forward

Matters arising from the financial statements audit and our review of the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources have been discussed with the City Treasurer.

We have also discussed the issues arising from our additional statutory powers and duties with the City Treasurer during the year.

We have made a number of recommendations, which are set out in the action plan at Appendix A. Recommendations have been discussed and agreed with the City Treasurer and the finance team.

Acknowledgement

We would like to take this opportunity to record our appreciation for the assistance provided by the finance team and other staff during our audit.

Grant Thornton UK LLP
May 2016

Section 2: Audit findings

01. Executive summary

02. Audit findings

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Materiality

In performing our audit, we apply the concept of materiality, following the requirements of International Standard on Auditing (UK & Ireland) (ISA) 320: Materiality in planning and performing an audit. The standard states that 'misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements'.

As we reported in our audit plan, we determined overall materiality to be £13,910k (being 1.5% of gross revenue expenditure). We have considered whether this level remained appropriate during the course of the audit and have revised our overall materiality to £15,344k in line with the increase in gross revenue expenditure in 2015/16 (remaining as 1.5% of gross revenue expenditure).

We also set an amount below which misstatements would be clearly trivial in the context of a reader of the whole statement of accounts with a balance sheet value in excess of £1billion and would not need to be accumulated or reported to those charged with governance because we would not expect that the accumulated effect of such amounts would have a material impact on the financial statements. We have defined the amount below which misstatements would be clearly trivial to be £695k. Our assessment of the value of clearly trivial matters has been adjusted to reflect our revised materiality calculation.

As we reported in our audit plan, we did not identify any items where we decided that separate materiality levels was appropriate. There has been no change to this decision for the financial statements audit.

Audit findings against significant risks

"Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, either due to size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty" (ISA (UK&I) 315).

In this section we detail our response to the significant risks of material misstatement which we identified in the Audit Plan. As we noted in our plan, there are two presumed significant risks which are applicable to all audits under auditing standards.

| | Risks identified in our audit plan | Work completed | Assurance gained and issues arising |
|----|---|--|---|
| 1. | <p>The revenue cycle includes fraudulent transactions</p> <p>Under ISA (UK&I) 240 there is a presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p> | <p>Having considered the risk factors set out in ISA240 and the nature of the revenue streams at Westminster City Council, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate revenue recognition • opportunities to manipulate revenue recognition in the Council is limited • the culture and ethical frameworks of local authorities, including Westminster City Council, mean that all forms of fraud are seen as unacceptable. <p>There is an increased risk for revenue recognition related to the managed service contract which we have addressed under the separate significant risk.</p> | <p>Our audit work has not identified any issues in respect of revenue recognition.</p> |
| 2. | <p>Management over-ride of controls</p> <p>Under ISA (UK&I) 240 it is presumed that the risk of management over-ride of controls is present in all entities.</p> | <p>We have undertaken the following work in relation to this risk:</p> <ul style="list-style-type: none"> • Review of entity controls in relation to journal transactions • Testing of journals entries • Review of accounting estimates, judgements and decisions made by management • Review of unusual significant transactions | <p>Our audit work has not identified any evidence of management over-ride of controls. However, our review of journal controls and testing of journal entries has identified a weakness in the system:</p> <ul style="list-style-type: none"> • cross entity journals can be raised across the tri-borough councils <p>In addition, the Council implemented a manual authorisation process for journals during the closedown period. Our testing has not identified any errors in the authorisation of these journals.</p> <p>We set out later in this section of the report our work and findings on key accounting estimates and judgements.</p> |

Audit findings against significant risks continued

We have also identified the following significant risks of material misstatement from our understanding of the entity. We set out below the work we have completed to address these risks.

| | Risks identified in our audit plan | Work completed | Assurance gained and issues arising |
|----|--|---|--|
| 3. | <p>Valuation of property, plant and equipment (PPE) The Council revalues its assets on a rolling basis over a five year period although for 2015/16 it requested that the current valuer review a sample of assets from the 4th and 5th year of the valuation cycle to ensure they were materially fairly stated. The Code requires that the Council ensures that the carrying value at the balance sheet date is not materially different from current value. This represents a significant estimate by management in the financial statements.</p> <p>The CIPFA Code of Practice has implemented IFRS 13 for the 2015/16 financial statements. The Council is required to include surplus assets within property, plant and equipment in its financial statements at fair value, as defined by IFRS13. The basis on which fair value is defined for investment property is also different to that used in previous years. This represents a significant change in the basis for estimation of these balances in the financial statements. There are also extensive disclosure requirements under IFRS 13 which the Council needs to comply with.</p> | <p>We have undertaken the following work in relation to this risk:</p> <ul style="list-style-type: none"> • Review of management's processes and assumptions for the calculation of the estimate • Review of the competence, expertise and objectivity of any management experts used • Review of the instructions issued to valuation experts and the scope of their work • Discussions with the Council's valuer about the basis on which the valuation was carried out, challenging the key assumptions • Review and challenge of the information used by the valuer to ensure it was robust and consistent with our understanding • Testing of revaluations made during the year to ensure they were input correctly into the Council's asset register • Review of the disclosures made by the Council in its financial statements to ensure they are in accordance with the requirements of the CIPFA Code of Practice and IFRS13 • Evaluation of the assumptions made by management for those assets not revalued during the year and how management satisfied themselves that these were not materially different to current value | <p>Our audit work has not identified any significant issues in respect of the PPE valuation risk.</p> <p>We have identified an error in Other Land & Buildings General Fund cost of valuation section as a £17m asset was duplicated and two pieces of land totalling £0.9m were incorrectly included in the asset register and note 21C. See table on page 22 for further information.</p> <p>Our testing of investment properties identified an error in one of the asset numbers provided to the valuer. As all investment properties were valued in the year there is no misstatement in the overall valuation in the financial statements. However, there is an error at the individual asset level in the FAR.</p> |

Audit findings against significant risks continued

We have also identified the following significant risk of material misstatement from our understanding of the entity. We set out below the work we have completed to address these risks.

| | Risks identified in our audit plan | Work completed | Assurance gained and issues arising |
|----|--|---|--|
| 4. | <p>Managed services partnership</p> <p><i>Risk of incomplete transfer of data from the old system to the new system</i></p> | <p>We have undertaken the following work in relation to this risk:</p> <ul style="list-style-type: none"> • Gained an understanding of the Council's relationship with the managed service provider for the service issues currently being faced in delivering the expected contractual commitments for the council • Reviewed the testing carried out by the finance team to date to gain assurance over the accuracy of transactions being made by BT • Reviewed the latest service provision arrangements to ensure that the Council has sufficient information to prepare the financial statements in line with the planned closedown and audit timetable of April and May 2016 • Discussions with Internal Audit to review the work completed and assurance level planned for the Head of Internal Audit opinion • IT audit review of the general controls in operation in the financial ledger and overall IT control environment. IT assurance over the completeness of the ledger • Substantive testing of all items in the financial statements that are greater than tolerable error set for the Council accounts | <p>The Council has proactively managed the system and service delivery issues throughout the 2015/16 financial year. Officers of the Council have regularly visited the BT offices to ensure that improved system controls are implemented and BT staff have the required knowledge about Local Authority accounting. Senior officers from BT have met regularly with Council management and have attended special meetings of the Audit & Performance Committee to update TCWG on progress being made to improve service delivery for the year end.</p> <p>The Council identified that there were significant issues with the transactional processing in the system and undertook extensive appropriate sample checking to ensure corrective action was taken by BT. In addition, they took action to mitigate the key error areas by performing manual processes locally for monitoring the financial information during the year. The finance team reviewed 16 key financial transactional / processing areas during November, February and April to cover the full financial year. The level of errors in the transactional testing by year end had significantly reduced due to the enhanced control environment after the November testing had been fed back to BT. Due to the work of officers to give the s151 officer confidence in the data in the GL, the Council were able to deliver the draft accounts in line with their ambitious closedown timetable.</p> <p>Internal Audit carried out a review of the finance testing and concluded that a robust process had been followed. The Head of IA Opinion is "the Council's governance, risk management and internal control systems in the areas audited were adequate with the exception of those areas detailed as 'amber' and 'red' all of which have been reported to A&PC".</p> <p>Management acknowledges in the Annual Governance Statement that there is the likelihood of error remaining in the GL and that further work is needed in 2016/17 to ensure service provision is at the required level.</p> <p>Our IT colleagues have carried out assurance work over the completeness of the transactions in the ledger with BT and Council officers. We obtained assurance that the 2015/16 ledger was complete which enabled us to select samples for testing.</p> <p>Our audit work has not identified any significant issues in relation to the managed services risk. We have identified internal control weaknesses in relation to journal procedures and reported these in the Internal Control section of this report (page 20).</p> |

New issues and risks identified during the course of the audit

This section provides commentary on new issues and risks which were identified during the course of the audit and were not previously communicated in the Audit Plan.

We identified a new significant risk during the financial statements planning process. The increased level of risk following receipt of the draft accounts was due to the material movement in the NNDR provision.

| | New risk identified | Work completed | Assurance gained and issues arising |
|----|--|---|---|
| 1. | <p>Provision for National Non-Domestic Rates (Business Rates) – SIGNIFICANT RISK</p> <ul style="list-style-type: none"> The Council's provision for business rates is the largest in the country and is a highly material balance in the financial statements. The provision is based on significant judgements made by management and uses a complex estimation technique to prepare the provision. The Council collected £1.747 billion in business rates in 2015/16. The provision in the 2015/16 financial statements increased by £96m during the year (Collection Fund Accounts Note 3). The Council's share of the business rates collected and provision is 30% which equates to a total provision of £117.9 million (Note 32). | <ul style="list-style-type: none"> Review of management's processes and assumptions for the calculation of the estimate Testing of the calculation and agreement to supporting documentation Review of the disclosures made by the Council in its financial statements | <p>We have received managements judgements and assumptions made in calculating the provision and confirm we are satisfied that the provision is materially fairly stated and the assumptions made are reasonable.</p> |

Audit findings against other risks

In this section we detail our response to the other risks of material misstatement which we identified in the Audit Plan. Recommendations, together with management responses are attached at appendix A.



| Transaction cycle | Description of risk | Work completed | Assurance gained & issues arising |
|------------------------------|--|--|---|
| Employee remuneration | Employee remuneration accruals understated (Remuneration expenses not correct) | We have undertaken the following work in relation to this risk: <ul style="list-style-type: none"> • documented our understanding of processes and key controls over the transaction cycle • undertaken walkthrough of the key controls to assess the whether those controls were in line with our documented understanding • substantive sampling of payroll system to payslips and contractual records • reconciled the total pay per the payroll system to the general ledger | Our audit work has not identified any significant issues in relation to the risk identified. |
| Operating expenses | Creditors understated or not recorded in the correct period (Operating expenses understated) | We have undertaken the following work in relation to this risk: <ul style="list-style-type: none"> • documented our understanding of processes and key controls over the transaction cycle • undertaken walkthrough of the key controls to assess the whether those controls were in line with our documented understanding • substantive sampling of payments throughout the year and year end creditors • testing for unrecorded liabilities | Our audit work has not identified any significant issues in relation to the risk identified. |
| Welfare expenditure | Welfare benefit expenditure improperly computed | We have undertaken the following work in relation to this risk: <ul style="list-style-type: none"> • documented our understanding of processes and key controls over the transaction cycle • undertaken walkthrough of the key controls to assess the whether those controls were in line with our documented understanding • sample testing of welfare benefits expenditure • reviewed the year end reconciliation between the housing benefits system and the general ledger | Our audit work has not identified any significant issues in relation to the risk identified. Our testing has identified one fail in the rent allowance benefits testing. There is no impact on the expenditure recorded in the financial statements so we have concluded the statements are materially fairly stated. We will follow up the error as part of the Housing Benefit claim work later in the year. |

Significant matters discussed with management

| | Significant matter | Commentary |
|----|--|--|
| 1. | Discussions or correspondence with management regarding accounting practices, the application of auditing standards, or fees for audit or other services | <p>We have discussed the implementation issues of the general ledger and the mitigating actions taken by management in our monthly liaison meetings with the finance team.</p> <p>We have set out our conclusions of the management response to the risks identified in the system during the financial year against the Managed Services significant risk on page 10.</p> |

Accounting policies, estimates and judgements

In this section we report on our consideration of accounting policies, in particular revenue recognition policies, and key estimates and judgements made and included with the Council's financial statements.

| Accounting area | Summary of policy | Comments | Assessment |
|---------------------------------|---|--|---|
| Revenue recognition | <ul style="list-style-type: none"> Revenue (income) from the sale of goods and provision of services is recognised when the Council transfers the goods or completes delivery of a service. Whether paid on account, by instalments or in arrears, government grants and third party contributions and donations are recognised as due to the Council when there is reasonable assurance that: <ul style="list-style-type: none"> (i) The Council will comply with the conditions attached to the payments; and (ii) The grants or contributions will be received. | <ul style="list-style-type: none"> The Council's accounting policy is appropriate under IAS 18 Revenue and CIPFA's Code of Practice on Local Government Accounting in the UK 2015/16 There is limited judgement involved in recognising income in the financial statements. Debtors are supported by invoices and income accruals are only created where income is certain to be collected or where adequate provision will be made for non-recovery Our testing of government grants and contributions has not identified any instances of improper revenue recognition. |  Green |
| Judgements and estimates | <p>Critical judgements include:</p> <ul style="list-style-type: none"> going concern review recognition of school assets whether group accounts should be prepared tri-borough working arrangements <p>Key estimates include:</p> <ul style="list-style-type: none"> PPE – useful lives and valuation pensions liability business rates provision fair value estimations | <ul style="list-style-type: none"> Critical judgements and estimation uncertainty are disclosed in notes 3 and 4 respectively of the financial statements We have requested that management enhances the disclosure within note 3 to set out the judgements in greater detail for the school assets and group accounts considerations. |  Green |




Assessment

● Marginal accounting policy which could potentially attract attention from regulators

● Accounting policy appropriate but scope for improved disclosure

● Accounting policy appropriate and disclosures sufficient

Accounting policies, estimates and judgements continued

| Accounting area | Summary of policy | Comments | Assessment |
|---|--|---|--|
| Judgements - local authority maintained schools premises | The Council has set out its judgement for schools accounting in Note 3. It recognises Community Schools on its Balance Sheet and has not recognised assets relating to Academies, Voluntary Aided, Voluntary Controlled or Free schools as it is of the opinion that these assets are not controlled by the Council. | The Council has included in the revised financial statements an expanded disclosure of their judgements made over schools consolidation that more fully reflects the decisions taken. |  Green |
| Going concern | Management has a reasonable expectation that the services provided by the Council will continue for the foreseeable future. For this reason, they continue to adopt the going concern basis in preparing the financial statements. | We have reviewed the Directors' assessment and are satisfied with management's assessment that the going concern basis is appropriate for the 2015/16 financial statements. |  Green |
| Other accounting policies | We have reviewed the Council's policies against the requirements of the CIPFA Code and accounting standards. | The Council's accounting policies are appropriate and consistent with previous years. We have not identified any issues which we wish to bring to your attention. |  Green |

Assessment

Other communication requirements

We set out below details of other matters which we, as auditors, are required by auditing standards and the Code to communicate to those charged with governance.

| | Issue | Commentary |
|----|--|--|
| 1. | Matters in relation to fraud | <ul style="list-style-type: none"> We have previously discussed the risk of fraud with the Audit and Performance Committee and been made aware of all frauds occurring during the year. None of which were of a significant nature to impact on our audit opinion. We have not been made aware of any other incidents in the period and no other issues have been identified during the course of our audit procedures. |
| 2. | Matters in relation to related parties | <ul style="list-style-type: none"> From the work we carried out, we have not identified any related party transactions which have not been disclosed. |
| 3. | Matters in relation to laws and regulations | <ul style="list-style-type: none"> You have not made us aware of any significant incidences of non-compliance with relevant laws and regulations and we have not identified any incidences from our audit work. |
| 4. | Written representations | <ul style="list-style-type: none"> A standard letter of representation will be requested from the Council for July 2016. The unadjusted misstatement is included as an appendix. In particular, representations have been requested from management in respect of the significant assumptions used in making accounting estimates for <ul style="list-style-type: none"> Business rates provision Valuation of property, plant and equipment and investment properties All information relating to the managed services has been provided to us in full. |
| 5. | Confirmation requests from third parties | <ul style="list-style-type: none"> We requested from management permission to send confirmation requests to the custodian, fund managers, bank and borrowing institutions. This permission was granted and the requests were sent. The majority of these requests were returned with positive confirmation, however 4 requests from the fund managers and 5 from borrowing institutions have not been received so we undertook alternative procedures, including reviewing the year end statements sent to the Council to confirm the balance as at 31 March 2016. |
| 6. | Disclosures | <ul style="list-style-type: none"> Our review found no material omissions in the financial statements. |

Other communication requirements continued



| | Issue | Commentary |
|----|--|--|
| 7. | Matters on which we report by exception | <ul style="list-style-type: none"> • We are required to report on a number of matters by exception in a number of areas: <ul style="list-style-type: none"> • If the Annual Governance Statement does not meet the disclosure requirements set out in the CIPFA/SOLACE guidance or is misleading or inconsistent with the information of which we are aware from our audit • The information in the Narrative Statement is materially inconsistent with the information in the audited financial statements or apparently materially incorrect based on, or materially inconsistent with, our knowledge of the Group/Council acquired in the course of performing our audit, or otherwise misleading. • We have not identified any issues we would be required to report by exception. We have requested a small number of enhancements to the Narrative Statement. |
| 8. | Specified procedures for Whole of Government Accounts | <ul style="list-style-type: none"> • We are required to carry out specified procedures (on behalf of the NAO) on the Whole of Government Accounts (WGA) consolidation pack under WGA group audit instructions. As the Council exceeds the specified group reporting threshold we are required to examine and report on the consistency of the WGA consolidation pack with the Council's audited financial statements. • The WGA consolidation pack is due to be submitted in July 2016. We will audit the pack in order to meet the reporting deadline of end September 2016. |

Internal controls



The purpose of an audit is to express an opinion on the financial statements.

Our audit included consideration of internal controls relevant to the preparation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control. We considered and walked through the internal controls for the significant and other risks identified (Employee Remuneration, Operating Expenses and Welfare Benefits) as set out on pages 10-14 above.

The matters that we identified during the course of our audit are set out in the table below. These and other recommendations, together with management responses, are included in the action plan attached at Appendix A.

| | Assessment | Issue and risk | Recommendations |
|----|---|--|--|
| 1. |  Deficiency | <ul style="list-style-type: none"> The Agresso accounting system allows for cross entity journals to be posted so that the debits and credits are not equal within the Westminster City Council ledger. The journals balanced over the tri-borough general ledger as the system allows for journals to be posted across the three councils / pension funds | <ul style="list-style-type: none"> Cross entity journals should be prevented from being posted in the ledger |
| 3. |  Deficiency | <ul style="list-style-type: none"> A small number of journals were not processed through the ledger before the draft accounts were provided to audit. The Council has posted the journals and provided a revised trial balance for audit. | <ul style="list-style-type: none"> All journals should be processed through the ledger before the financial statements are submitted to audit |

Assessment

-  Significant deficiency – risk of significant misstatement
-  Deficiency – risk of inconsequential misstatement

The matters reported here are limited to those deficiencies that we have identified during the course of our audit and that we have concluded are of sufficient importance to merit being reported to you in accordance with auditing standards.

Unadjusted misstatements

The table below provides details of adjustments identified during the audit which have not been made within the final set of financial statements. The Audit and Performance Committee is required to approve management's proposed treatment of all items recorded within the table below:

| Detail | Comprehensive Income and Expenditure Account £'000 | Balance Sheet £'000 | Reason for not adjusting |
|---|--|---------------------------|--|
| <p>1 Westminster Community Homes (WCH) The Council incorporated the unaudited figures from the draft Westminster Community Homes accounts in draft Council accounts. The audit of the WCH has now finished and the profit and net assets figures in the audited accounts are different by an amount greater than our trivial level:</p> <p>Profit draft WCH accounts £2,703k audited WCH accounts £1,760k difference of £943k (this is included in the net assets difference below)</p> <p>Net assets draft WCH accounts £13,990k audited WCH accounts £12,379k difference of £1,611k (this amendment would be to the assets and reserves so nil impact overall)</p> <p>As the differences identified are well below our materiality level and the amendments to the Westminster City Council accounts are throughout the primary statements and disclosure notes the Council has chosen not to adjust these items and we have accepted this reason.</p> | | | Not material change as a consequence of subsidiary audit being completed after the council's main accounts produced and audited. |
| Overall impact | £ Nil | £ Nil | |

Adjusted misstatements, misclassifications and disclosure changes

The table below provides details of adjusted misstatements, misclassification and disclosure changes identified during the audit which have been made in the final set of financial statements.

| Adjustment type | Value £'000 | Account balance | Impact on the financial statements |
|-------------------------|----------------|---|---|
| 1 Misclassification | 50,436 | Revaluations (Note 21B) | Assets under construction which have been completed in the year and transferred to other asset categories and additions in year have been disclosed as revalued in the note. As the assets are not revalued in 2015/16 they should be disclosed in the 'held at historic cost' line with narrative below the table explaining the amounts. Amendments to historic cost and from 31 March 2016 are: Other Land and Buildings (HRA) of £42,929k and Other Land Buildings (GF) of £7,506k. |
| 2 Disclosure | N/A | Revaluations (Note 21B) | The explanation for council dwellings valuation process has been updated to reflect the actual valuation approach for 2015/16, including the date and type of valuation used for the closing balance. |
| 3 Adjusted misstatement | 17,712 | Property, Plant and Equipment (Note 21C) | The note and asset register includes a duplicate asset totalling £17m and a piece of land totalling £0.712m that relates to an asset already transferred off the Balance Sheet. The draft note accounted for the removal of these assets as a downward revaluation in the revaluation reserve and CIES whereas it should have been shown as an 'Other Movement in Cost or Valuation'. Accumulated depreciation totalling £0.9m has also been amended. A narrative description of the movement has also been added to the note. |
| 4 Disclosure | Various | Financial Instruments (Note 24) | <p>The Fair Value of Financial Assets and Liabilities disclosure did not include a finance lease totalling £4m in the carrying value of the finance lease liabilities. This understatement affected the 2014/15 and 2015/16 disclosure.</p> <p>The cash and cash equivalents balance of £117m had been excluded from the Categories of Financial Instruments table. This balance has now been included in the 'Loans and receivables' line.</p> <p>Also, the cash element of the balance (£32m) had been excluded from the Fair Value of assets and liabilities table. This has now been amended. The cash equivalents of £85m had been correctly included.</p> |

Section 3: Value for Money

01. Executive summary

02. Audit findings

03. Value for Money

04. Other statutory powers and duties

05. Fees, non-audit services and independence

06. Communication of audit matters

Background

We are required by section 21 of the Local Audit and Accountability Act 2014 (the Act) and the NAO Code of Audit Practice (the Code) to satisfy ourselves that the Council has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. This is known as the Value for Money (VFM) conclusion.

We are required to carry out sufficient work to satisfy ourselves that proper arrangements are in place at the Council. The Act and NAO guidance state that for local government bodies, auditors are required to give a conclusion on whether the Council has put proper arrangements in place.

In carrying out this work, we are required to follow the NAO's Auditor Guidance Note 3 (AGN 03) issued in November 2015. AGN 03 identifies one single criterion for auditors to evaluate:

In all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.

AGN03 provides examples of proper arrangements against three sub-criteria but specifically states that these are not separate criteria for assessment purposes and that auditors are not required to reach a distinct judgement against each of these.

Risk assessment

We carried out an initial risk assessment in February 2016 and identified one significant risk in relation to the capital programme business case process which we communicated to you in our Audit Plan dated February 2016. We confirmed that following the completion of our detailed risk planning in April 2016 we had not identified any new significant risks.

We identified risks in respect of specific areas of proper arrangements using the guidance contained in AGN03.

We have continued our review of relevant documents up to the date of giving our report, and have not identified any further significant risks where we need to perform further work.

We carried out further work only in respect of the significant risk we identified from our initial and ongoing risk assessment. Where our consideration of the significant risks determined that arrangements were not operating effectively, we have used the examples of proper arrangements from AGN 03 to explain the gaps in proper arrangements that we have reported in our VFM conclusion.

Key findings

We set out below our key findings against the significant risk we identified through our initial risk assessment and further risks identified through our ongoing review of documents.

| Significant risk | Work to address the risk | Findings and conclusions |
|---|--|---|
| <p>Significant capital projects The programme includes a number of key projects and investments, which are significant both in scale and financial terms. The Council recognised that there was a weakness in arrangements and introduced a new business case process for all major schemes.</p> | <p>We reviewed the new business case arrangements for awarding capital programme expenditure to projects to establish whether the arrangements for identifying, managing and monitoring the project from the initial stage are appropriate.</p> <p>We reviewed one business case that has been going through the new process to date – refurbishment of Westminster City Hall.</p> | <p>The Council recognised the need for tighter controls around the capital programme as the level of projects and spend has significantly increased since the City for All plan was launched a year ago. The plan focuses on key regeneration plans to ensure the City continues to be a hotspot for business, retail and tourism. A new business case template for all major capital schemes was developed during the year. There are three business case stages: strategic; outline; and full.</p> <p>The new template requires there to be greater scrutiny and information provided at the outline business case stage. We have reviewed the template and concluded that this stage has been split into the correct five key areas: strategic; economic; commercial; financial; and management. These areas ensure that all key information is provided to the Executive Director and Cabinet Member for making the decision about investment.</p> <p>The Council has a Capital Review Group which provides challenge and scrutiny of the business cases. This has an oversight of all capital schemes and monitors progress at the monthly meetings chaired by the Cabinet Member of Finance and Corporate Services. The ward member is also asked to be involved at the outline business case stage to ensure greater member and resident involvement in the scheme.</p> <p>One capital scheme has started to go through the outline business case model. The Westminster City Hall refurbishment programme case sets out clearly the options available to the decision maker with cost benefit and sensitivity analysis of these options. The case is thorough and has been shared with Cabinet Members to ensure robust scrutiny is given to it before the Cabinet meeting to make the final decision.</p> <p>To ensure there is sufficient guidance available, the major projects team has provided training to officers who will be completing the templates and on-going support will be provided by them as the Council recognises this is a major change in the way capital schemes are developed and managed.</p> <p>There were five key capital projects for 2015/16 and these were delayed as a decision was made to put all of them through the new business case process. This is the key reason for the capital programme slippage. This decision enables the Council to give full consideration and have a robust audit trail for projects in the future. The Council has also made a decision to only implement this for new projects and is not going back to review previous project cases. This is a reasonable approach as the level of capital investment was planned to be significantly higher from 2015/16 onwards.</p> <p>On that basis we concluded that the risk was sufficiently mitigated and the Council has proper arrangements in place.</p> |

Significant qualitative aspects

AGN 03 requires us to disclose our views on significant qualitative aspects of the Council's arrangements for delivering economy, efficiency and effectiveness.

We have focused our work on the significant risk that we identified in the Council's arrangements. In arriving at our conclusion, our main considerations were:

- the robustness of the new business case process (see findings on page 26)
- review of the financial outturn position for 2015/16 and financial planning for 2016/17
- review of the significant governance issues raised by the Council in the Annual Governance Statement 2015/16 to determine the impact on the overall vfm conclusion
- obtaining an update on the previous auditor conclusion findings.

Financial Outturn 2015/16

The Council planned for an underspend against budget throughout the financial year and delivered a revenue outturn position of +£5.54m. As a consequence of the strong financial monitoring during the year and delivery of an underspend, Cabinet have approved that the full amount is transferred in to the General Fund Reserves to increase the closing balance to £41.58m. This will provide the Council with on-going financial resilience which is important over the medium term to ensure the Council can meet the challenges it faces in setting the budget from 2018/19 and beyond. The predictions of an increasingly austere economic climate are in line with our expectations and the increase in the General Fund Reserves gives additional resilience to management and members.

The planned capital programme budget for 2015/16, including slippage from 2014/15, totalled £188.3m. During the financial year the Council recognised that this

level of capital spend would not be delivered due to the increased governance in the management of the capital programme (see significant risk findings) and the budget was revised downwards to a forecasted outturn of £75.46m at the end of January. The Council delivered an outturn position of £69.43m. This is a significant slippage from the original budget but was a decision during the year by management and members to ensure that the capital projects were given robust consideration to deliver value for money before project work began.

We do not have any concerns arising from the 2015/16 budget outturn position over the Council's arrangements for delivering economy, efficiency and effectiveness.

Financial Planning 2016/17

The Council approved the revenue and capital budgets in February 2016. The revenue budget covers a four year period (2016/17 to 2019/20) although the final year is high level predictions and the capital budget plans slightly further to 2020/21. The Council has identified a savings target of £117m for the three year period to 2018/19 allocated respectively as £33m, £34m and £50m. It has fully identified the savings plans for the coming year and is confident in the robustness of the plans for 2017/18. It has recognised that there is a budget gap for 2018/19 and that this year will be difficult to meet the financial challenges and service delivery as it has continued to deliver since 2010. The Council started to develop a 10 year view of its financial position during 2015/16 and is looking to enhance the predictions during the year to ensure the future challenges are met.

The Council has planned a balanced budget for 2016/17 with a contribution to the General Fund Reserves forecast at year end. A high level of the budget planning process and assumptions underpinning the budget gives assurance

that the process is robust and comprehensive, considering both the risks and opportunities at a strategic and operational level across the Council.

The Council's fully funded five year capital programme will deliver £1.72bn (gross spend) of projects to meet the City for All plan. The Council has significant regeneration projects planned over the period to help it maintain its business, retail, entertainment and tourism global recognition.

The Budget and Performance Task Group challenges the Cabinet Member and Executive Director in February over the assumptions and saving plans underpinning the 2016/17 budget figures. This process provides a good level of scrutiny to the budget before the Cabinet and Full Council approval. The group comprises of five councillors and is led by the Cabinet Member for Finance and Corporate Services.

We do not have any concerns arising from the 2016/17 financial planning process over the Council's arrangements for delivering economy, efficiency and effectiveness.

Annual Governance Statement 2015/16

The AGS has been reviewed as part of the opinion audit and we have not identified any non-compliance in the statement. The Council has recognised three significant governance matters for the coming financial year:

- **Managed Services:** we identified this as a significant risk for our audit opinion in 2015/16. We have set out our findings against this risk on page 12. We are satisfied that the Council has proactively managed the issues arising from the service delivery and has challenged the partner to deliver a higher quality service.
- **IT services:** Internal Audit review of the IT environment during the year

identified two areas of weakness in relation to third party remote access and multi-user logins. We carried out a review of the IT general control environment in April 2016 and did not identify any deficiencies that would impact on the audit opinion or overall conclusion of IT arrangements at the Council so we are assured that the action being taken by the Council has improved the control environment.

- **Procurement – Contracts Register (capitalSourcing):** the Council is proactively addressing the risk of information in the contracts register being out of date or incorrect by providing support and training to staff who use the system. The follow up review by Internal Audit at the end of the financial year indicated improved levels of compliance within the system.

We have reviewed these matters and concluded that none of the issues indicate an overall weakness in the Council's arrangements for delivering economy, efficiency and effectiveness nor its arrangements in all significant respects to ensure it delivered value for money in its use of resources.

Value for Money 2014/15 follow up

KPMG identified a weakness in relation to procurement. This emerged from objections relating to the Council's financial statements covering the financial years 2008/09 to 2011/12.

The weaknesses identified by KPMG were in relation to non-compliance with the proper procedures required by the Council's Procurement Code and internal financial regulations, in particular the processes for contract letting, contract variations and for formalising contract documentation. These weaknesses were identified in 2013/14 as part of the investigation in to the matters raised in the objections.

The Head of Procurement has made improvements to the procedures and processes during the year. The previous auditor was able to conclude the investigation and respond to the objections in early 2016. This led to the official closure of the 2008/09 to 2011/12 audit years in March 2016.

We do not have any concerns arising from the follow up of 2014/15 findings over the Council's arrangements for delivering economy, efficiency and effectiveness.

Overall conclusion

Based on the work we performed to address the significant risks, we concluded that:

- the Council had proper arrangements in all significant respects to ensure it delivered value for money in its use of resources. The text of our report, which confirms this can be found at Appendix B.

Recommendations for improvement

We discussed findings arising from our work with management and have agreed recommendation for improvement as follows:

- Ensure that all new major capital projects go through the business case process and review the approach after the first project has gone through the full process
- Closely monitor the capital programme to ensure slippage levels are reduced in 2016/17
- Continue to identify revenue savings and efficiencies to ensure the budget gap in 2018/19 is delivered
- Continue to action the planned improvements in the weaknesses reported in the AGS

Management's response to these can be found in the Action Plan at Appendix A.

Significant difficulties in undertaking our work

We did not identify any significant difficulties in undertaking our work on your arrangements which we wish to draw to your attention.

Significant matters discussed with management

There were no matters where no other evidence was available or matters of such significance to our conclusion or that we required written representation from management or those charged with governance.

Any other matters

There were no other matters from our work which were significant to our consideration of your arrangements to secure value for money in your use of resources.

Section 4: Other statutory powers and duties

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06. Communication of audit matters

We set out below details of other matters which we, as auditors, are required by the Act and the Code to communicate to those charged with governance.

| | Issue | Commentary |
|----|--|---|
| 1. | Public interest report | <ul style="list-style-type: none">• We have not identified any matters that would require a public interest report to be issued. |
| 2. | Written recommendations | <ul style="list-style-type: none">• We have not made any written recommendations that the Council is required to respond to publicly. |
| 3. | Application to the court for a declaration that an item of account is contrary to law | <ul style="list-style-type: none">• We have not used this duty. |
| 4. | Issue of an advisory notice | <ul style="list-style-type: none">• We have not used this duty. |
| 5. | Application for judicial review | <ul style="list-style-type: none">• We have not used this duty. |

During the course of our audit we were informed of an issue that had previously given rise to an objection under sections 26 and 27 of the Local Audit and Accountability Act 2014 in respect of prior year financial statements that have not yet been formally closed.

We worked with a local elector to decide upon an objection relating to the 2012/13 to 2014/15 financial statements and formally closed these audit years in May 2016.

As at 11 July 2016, we have not received any formal objections to the 2015/16 financial statements. We will update you on the conclusion reached at the July Audit and Performance Committee.

Section 5: Fees, non-audit services and independence

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06. Communication of audit matters

We confirm below our final fees charged for the audit and provision of non-audit services.

Fees

| | £ |
|---|----------------|
| Council audit – scale fee | 185,719 |
| Council audit – additional fee | 25,000 |
| Grant certification | 25,386 |
| Objections from 2012/13 to 2014/15 | 25,000 |
| Total audit fees (excluding VAT) | 261,105 |

Additional fee

We have agreed an additional fee for the Council audit of £25,000 due to the additional work required to obtain assurance over the completeness of the general ledger and journals population.

Grant certification

Our fees for grant certification cover only housing benefit subsidy certification, which falls under the remit of Public Sector Audit Appointments Limited.

Fees in respect of other grant work, such as reasonable assurance reports, are shown under 'Fees for other services'.

Fees for other services

| Service | Fees £ |
|--|--------|
| Audit related services: | |
| • Teachers pensions return | 3,500 |
| • Pooling of housing capital receipts | 4,000 |
| Non-audit services | |
| • Financial resilience capacity building programme | 10,500 |

Independence and ethics

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Auditing Practices Board's Ethical Standards and therefore we confirm that we are independent and are able to express an objective opinion on the financial statements.

We confirm that we have implemented policies and procedures to meet the requirements of the Auditing Practices Board's Ethical Standards.

Section 6: Communication of audit matters

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06. Communication of audit matters

Communication to those charged with governance

International Standards on Auditing ISA (UK&I) 260, as well as other ISAs, prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table opposite.

The Audit Plan outlined our audit strategy and plan to deliver the audit, while this Audit Findings report presents the key issues and other matters arising from the audit, together with an explanation as to how these have been resolved.

Respective responsibilities

The Audit Findings Report has been prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by Public Sector Audit Appointments Limited (<http://www.psa.co.uk/appointing-auditors/terms-of-appointment/>)

We have been appointed as the Council's independent external auditors by the Audit Commission, the body responsible for appointing external auditors to local public bodies in England at the time of our appointment. As external auditors, we have a broad remit covering finance and governance matters.

Our annual work programme is set in accordance with the Code of Audit Practice ('the Code') issued by the NAO (<https://www.nao.org.uk/code-audit-practice/about-code/>). Our work considers the Council's key risks when reaching our conclusions under the Code.

It is the responsibility of the Council to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Council is fulfilling these responsibilities.

| Our communication plan | Audit Plan | Audit Findings |
|--|------------|----------------|
| Respective responsibilities of auditor and management/those charged with governance | ✓ | |
| Overview of the planned scope and timing of the audit. Form, timing and expected general content of communications | ✓ | |
| Views about the qualitative aspects of the entity's accounting and financial reporting practices, significant matters and issues arising during the audit and written representations that have been sought | | ✓ |
| Confirmation of independence and objectivity | ✓ | ✓ |
| A statement that we have complied with relevant ethical requirements regarding independence, relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged Details of safeguards applied to threats to independence | ✓ | ✓ |
| Material weaknesses in internal control identified during the audit | | ✓ |
| Identification or suspicion of fraud involving management and/or others which results in material misstatement of the financial statements | | ✓ |
| Non compliance with laws and regulations | | ✓ |
| Expected modifications to auditor's report | | ✓ |
| Uncorrected misstatements | | ✓ |
| Significant matters arising in connection with related parties | | ✓ |
| Significant matters in relation to going concern | | ✓ |

Appendices

Appendix A: Action plan

Priority

High - Significant effect on control system

Medium - Effect on control system

Low - Best practice

| Rec No. | Recommendation | Priority | Management response | Implementation date & responsibility |
|---------|---|----------|---|--|
| 1. | Cross entity journals should be prevented from being posted in the Agresso Ledger | Medium | <p>The standard journal process has built in controls which prevent cross entity posting. The issues experienced in year were as a result of the requirement to use a separate process to bypass the system performance issues. This was only in place for 5 weeks and has since been removed. The Council monitored transactions throughout this process which resulted in these items being identified and amended appropriately.</p> <p>For payroll related transactions there are controls in place to ensure each payroll run is reviewed before being finalised to ensure any potential cross entity transactions are identified and corrected. In addition there are also daily trial balance reports run to ensure the entity's overall trial balance is working correctly.</p> | Already in place – MSP/BT |
| 2. | All journals should be processed through the ledger before the financial statements are submitted to audit | Medium | <p>The Council implemented a strategy of controlling the final few technical adjustments which meant a small number of journals had not been processed through the ledger at the end of the year. There is a clear audit trail available which details these items between the general ledger and the statement of accounts. The general ledger will be fully updated for these issues before audit sign off. In the Council's drive to improve the efficiency and automation of the accounts process the ledger will always be the source document used to produce the statements.</p> | On-going - Corporate Finance |
| 3. | Ensure that all new major capital projects go through the business case process and review the approach after the first project has gone through the full process | Low | <p>The strategy now in place is for all major projects to be approved in this manner. The Council has regular review points in place to monitor projects throughout the process and a full review of projects on completion will provide an opportunity to review and improve the process.</p> | Already in place – Major Projects team |

Appendix A: Action plan continued

| Rec No. | Recommendation | Priority | Management response | Implementation date & responsibility |
|---------|--|----------|---|--------------------------------------|
| 4. | Closely monitor the capital programme to ensure slippage levels are reduced in 2016/17 | Medium | The slippage experienced in 2015/16 was in the main due in a number of external factors outside the control of the Council. The Council has developed a process to provide a detailed quarterly review of capital schemes to identify projected slippage and ensure budgets are aligned as appropriate. The business case approach mentioned above will aid in increasing the level of detail in which each project is monitored and budgets aligned. | July 2016 – Corporate Finance/FMs |
| 5. | Continue to identify revenue savings and efficiencies to ensure the budget gap in 2018/19 is delivered | Medium | Finalising the future savings required to meet the revenue budget gap in future years is a key priority. The Council is already holding regular review meetings in order to find these savings to establish requirements and is considering the possibility of the fixed four year settlement. | Already begun |
| 6. | Continue to action the planned improvements in the weaknesses reported in the AGS | Medium | The AGS is produced in conjunction with the internal audit function and any suggestions included within this will be acted upon. The Council has demonstrated in its work carried out testing the new Agresso system the determination to ensure the maximum assurance can be placed on the processes and procedures in place. | On-going |

Appendix B: Audit opinion (DRAFT)

We anticipate we will provide the Council with an unmodified audit report

DRAFT - INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF WESTMINSTER CITY COUNCIL

We have audited the financial statements of Westminster City Council (the "Authority") for the year ended 31 March 2016 under the Local Audit and Accountability Act 2014 (the "Act"). The financial statements comprise the Movement in Reserves Statement, the Comprehensive Income and Expenditure Statement, the Balance Sheet, the Cash Flow Statement, the Housing Revenue Account Income and Expenditure Statement, the Movement on the Housing Revenue Account Statement, the Collection Fund and the related notes. 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 2015/16.

This report is made solely to the members of the Authority, as a body, in accordance with Part 5 of the Act and as set out in paragraph 43 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the members those matters we are required to state in an auditor's 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 Authority and the Authority's members as a body, for our audit work, for this report, or for the opinions we have formed.

Respective responsibilities of the City Treasurer and auditor

As explained more fully in the Statement of the City Treasurer's Responsibilities, the City Treasurer 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 2015/16, and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.

Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of whether the accounting policies are appropriate to the Authority's circumstances and have been consistently applied and adequately disclosed; the

reasonableness of significant accounting estimates made by City Treasurer; and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the Narrative to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by us in the course of performing the audit. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

Opinion on financial statements

In our opinion the financial statements:
give a true and fair view of the financial position of Westminster City as at 31 March 2016 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 2015/16 and applicable law.

Opinion on other matters

In our opinion, the other information published together with the audited financial statements in the Narrative Report is consistent with the financial statements.

Matters on which we are required to report by exception

We are required to report to you if:
in our opinion the Annual Governance Statement does not comply with the 'Delivering Good Governance in Local Government: a Framework' published by CIPFA/SOLACE in June 2007; or
we issue a report in the public interest under section 24 of the Act; or
we make a written recommendation to the Authority under section 24 of the Act; or
we exercise any other special powers of the auditor under the Act.

We have nothing to report in these respects.

Conclusion on the Authority's arrangements for securing value for money through economic, efficient and effective use of its resources

Respective responsibilities of the Authority and auditor

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.

We are required under Section 20(1)(c) of the Act to be satisfied 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.

Scope of the review of the Authority's arrangements for securing value for money through economic, efficient and effective use of its resources

We have undertaken our review in accordance with the Code of Audit Practice prepared by the Comptroller and Auditor General as required by the Act (the "Code of Audit Practice"), having regard to the guidance on the specified criteria issued by the Comptroller and Auditor General in November 2015, as to whether the Authority had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. The Comptroller and Auditor General determined this criteria as that necessary for us to consider under the Code of Audit Practice in satisfying ourselves whether the Authority put in place proper arrangements for securing value for money through the economic, efficient and effective use of its resources for the year ended 31 March 2016.

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 the Authority has put in place proper arrangements to secure value for money through economic, efficient and effective use of its resources.

Conclusion

On the basis of our work, having regard to the guidance on the specified criteria issued by the Comptroller and Auditor General in November 2015, we are satisfied that in all significant respects, Westminster City Council has put in place proper arrangements for securing value for money through economic, efficient and effective use of its resources for the year ended 31 March 2016.

Certificate

We cannot formally conclude the audit and issue an audit certificate in accordance with the requirements of the Act and the Code of Audit Practice until we have completed the work necessary to issue our Whole of Government Accounts (WGA) Component Assurance statement for Westminster City Council for the year ended 31 March 2016. We are satisfied that this work does not have a material effect on the financial

statements or on our conclusion on the Authority's arrangements for securing value for money through economic, efficient and effective use of its resources.

Paul Dossett
for and on behalf of Grant Thornton UK LLP, Appointed Auditor

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Date: TBC



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