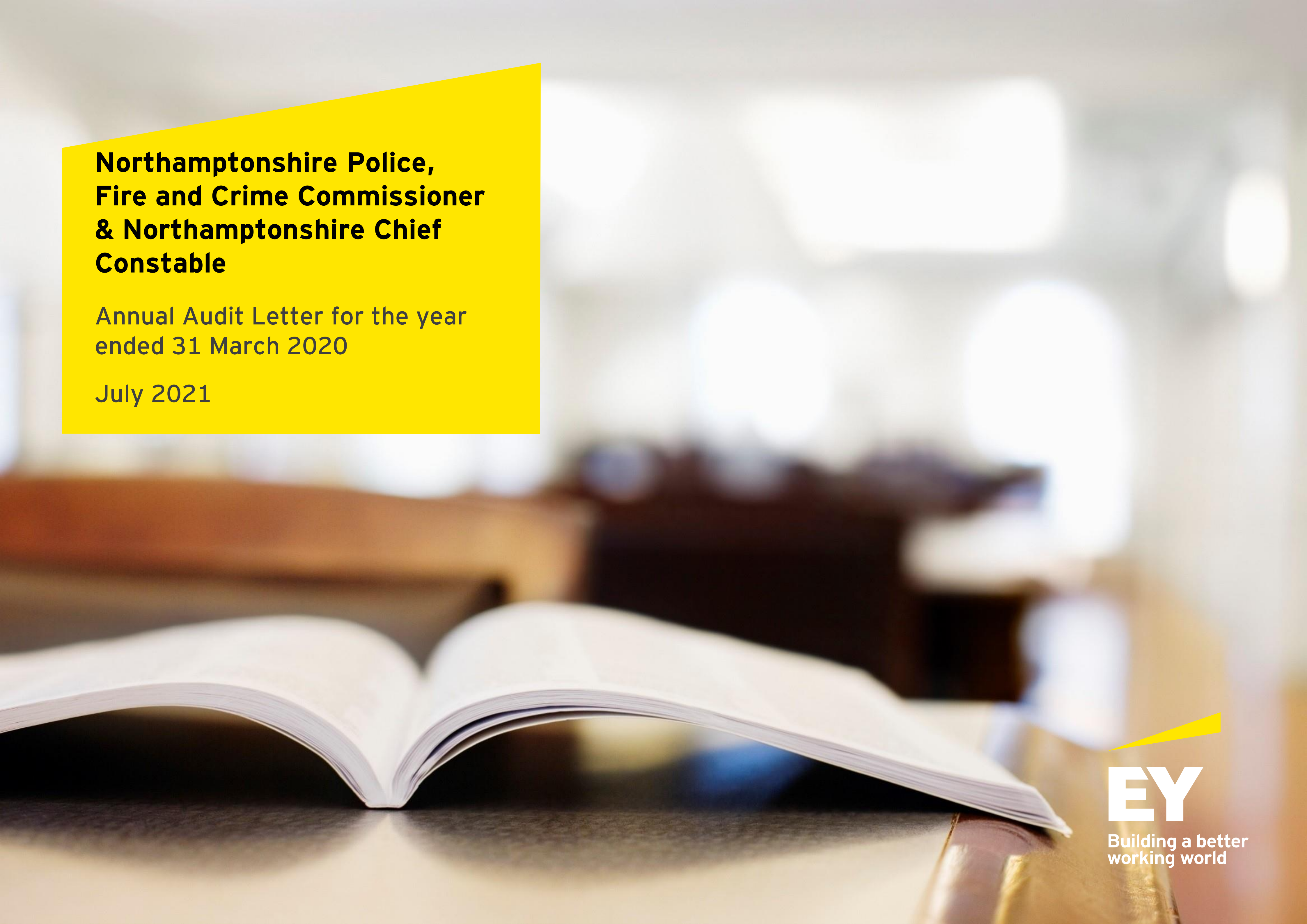


Northamptonshire Police, Fire and Crime Commissioner & Northamptonshire Chief Constable

Annual Audit Letter for the year ended 31 March 2020

July 2021

Building a better working world

Contents

Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website (www.psaa.co.uk). .

This 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 (updated April 2018)' issued by 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 statute, and covers matters of practice and procedure which are of a recurring nature.

This Annual Audit letter is prepared in the context of the Statement of responsibilities. It is addressed to the Members of the audited body, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure – If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Hywel Ball, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.

Section 1

Executive Summary

Executive Summary

We are required to issue an annual audit letter to Northamptonshire Police, Fire and Crime Commissioner (PFCC) & Northamptonshire Chief Constable (CC) (together referred to as "the Group") following completion of our audit procedures for the year ended 31 March 2020. Covid-19 had an impact on a number of aspects of our 2019/20 audit. We set out these key impacts below.

Area of impact	Commentary
Impact on the delivery of the audit	
► Changes to reporting timescales	As a result of Covid-19, new regulations, the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 No. 404, have been published and came into force on 30 April 2020. This announced a change to publication date for final, audited accounts from 31 July to 30 November 2020 for all relevant authorities. We started our audit work in November 2020. Despite the disruption caused by Covid-19, management was able to produce the draft financial statements with in deadline (i.e. 31 August 2020) before the commencement of the audit. However, Covid-19 situation caused a delay in obtaining data from the management for our data analytics procedures in order to select samples. This, coupled with Covid-19, has also affected our ability to complete the audit to the planned timetable. There have also been additional audit procedures we had to perform to respond to the additional risks caused by the factors mainly due to Covid-19.
Impact on our risk assessment	
► Valuation of Property Plant and Equipment (PPE) and Investment properties (IP)	The Royal Institute of Chartered Surveyors (RICS), the body setting the standards for property valuations, issued guidance to valuers highlighting that the uncertain impact of Covid-19 on markets might cause a valuer to conclude that there is a material uncertainty. Material judgemental inputs and estimation techniques are required to calculate the year-end asset property valuations held on the balance sheet. Considering the uncertainty and impact caused by Covid-19, we decided to involve our internal valuation experts (EYRE) to help us in reviewing valuation work performed by the internal valuers of the Group. Based on our procedures, EYRE raised an observation on the valuation basis and assumptions used for Wootton Hall HQ building. Considering the observation from our EY specialists, the management agreed to present enhanced disclosures in the financial statements.
► Disclosures on Going Concern	Financial plans for 2020/21 and medium term financial plans needed revision for Covid-19. We considered the unpredictability of the current environment gave rise to a risk that the Group would not appropriately disclose the key factors relating to going concern, underpinned by managements assessment with particular reference to Covid-19 and the Group's actual year end financial position and performance/outturn reports, along with cashflow forecast till June 2022.
► Events after the balance sheet date	We identified an increased risk that further events after the balance sheet date concerning the current Covid-19 pandemic will need to be disclosed. The amount of detail required in the disclosure needed to reflect the specific circumstances of the Group.

Executive Summary (continued)

We are required to issue an annual audit letter to Northamptonshire Police, Fire and Crime Commissioner (PFCC) & Northamptonshire Chief Constable (CC) following completion of our audit procedures for the year ended 31 March 2020. Covid-19 had an impact on a number of aspects of our 2019/20 audit. We set out these key impacts below.

Area of impact	Commentary
Impact on the scope of our audit	
► Information Produced by the Entity (IPE)	We identified an increased risk around the completeness, accuracy, and appropriateness of information produced by the entity due to the inability of the audit team to verify original documents or re-run reports on-site from the Group's systems. We undertook the following to address this risk: ▸ Used the screen sharing function of Microsoft Teams to evidence re-running of reports used to generate the IPE we audited; and ▸ Agree IPE to scanned documents or other system screenshots.
► Consultation requirements	Additional EY consultation requirements concerning the impact on auditor reports. The changes to audit risks and audit approach changed the level of work we needed to perform.

Executive Summary (continued)

The tables below set out the results and conclusions on the significant areas of the audit process.

Area of Work	Conclusion
Opinion on the Group's :	
► Financial statements	Unqualified/unmodified – the financial statements give a true and fair view of the financial position of the Group as at 31 March 2020 and of its expenditure and income for the year then ended.
► Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts
► Concluding on the Group's arrangements for securing economy, efficiency and effectiveness	We concluded that you have put in place proper arrangements to secure value for money in your use of resources.

Area of Work	Conclusion
Reports by exception:	
► Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the Group
► Public interest report	We had no matters to report in the public interest
► Written recommendations to the Group, which should be copied to the Secretary of State	We had no matters to report.
► Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report.

Executive Summary (continued)

Area of Work	Conclusion
Reporting to the National Audit Office (NAO) on our review of the Group's Whole of Government Accounts return (WGA).	We had no matters to report. The Group is below the specified audit threshold of £500mn. Therefore, we did not perform any audit procedures on the return.

As a result of the above we have also:

Area of Work	Conclusion
Issued a report to those charged with governance of the Group communicating significant findings resulting from our audit.	Our Audit Results Report dated 11 June 2021 was circulated to Joint Independent Audit Committee.
Issued a certificate that we have completed the audit in accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	Our certificate was issued on 21 June 2021

We would like to take this opportunity to thank the Group's staff for their assistance during the course of our work.

Neil Harris
Associate Partner
For and on behalf of Ernst & Young LLP

Section 2

Purpose and Responsibilities

Ref: EY-000092651-01

Purpose

The Purpose of this Letter

The purpose of this annual audit letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the Group.

We have already reported the detailed findings from our audit work in our 2019/20 Audit Results Report dated 11 June 2021 to the Joint Independent Audit Committee as well as to the PFCC and CC as corporate soles, and those charged with governance. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the Group.

Responsibilities

Responsibilities of the Appointed Auditor

Our 2019/20 audit work has been undertaken in accordance with the Audit Plan dated 16 December 2020 that we issued in December 2020 in Joint Independent Audit Committee meeting and to the PFCC and CC. Our audit is conducted in accordance with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office.

As auditors we are responsible for:

- Expressing an opinion:
  - On the 2019/20 financial statements; and
  - On the consistency of other information published with the financial statements.
- Forming a conclusion on the arrangements the Group has to secure economy, efficiency and effectiveness in its use of resources.
- Reporting by exception:
  - If the annual governance statement is misleading or not consistent with our understanding of the Group;
  - Any significant matters that are in the public interest;
  - Any written recommendations to the Group, which should be copied to the Secretary of State; and
  - If we have discharged our duties and responsibilities as established by the Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the National Audit Office (NAO) on your Whole of Government Accounts return. The Group is below the specified audit threshold of £500m. Therefore, we did not perform any audit procedures on the return.

Responsibilities of the Group

The Group is responsible for preparing and publishing its statement of accounts accompanied by an Annual Governance Statement (AGS). In the AGS, the Group reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The Group is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

Section 3

Financial Statement Audit

Financial Statement Audit

Key Issues

The Group's Statement of Accounts is an important tool for the Group to show how it has used public money and how it can demonstrate its financial management and financial health.

We audited the PFCC & CC's Statement of Accounts in line with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office and issued an unqualified audit report on 21 June 2021.

Our detailed findings were reported to the JIAC through our Audit Result Report dated 11 June 2021.

The key issues identified as part of our audit were as follows:

Significant Risk	Conclusion
Misstatements due to fraud or error (Risk of management override) 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. We have not identified a heightened risk of management override overall, but we have identified a specific area where management override might occur: incorrect capitalisation of revenue spending.	We have not identified any material weaknesses in controls or evidence of material management override. We have not identified any instances of inappropriate judgements being applied. We have not identified adjustments outside of the normal course of business. All journals tested have appropriate rationale. We did not identify any other transactions during our audit which appeared unusual or outside the Group's normal course of business.
Incorrect capitalisation of revenue expenditure In considering how the risk of management override may present itself, we concluded that this is primarily through management taking action to override controls and manipulate in year financial transactions that impact the medium to longer term projected financial position. A key way of improving the revenue position is through the inappropriate capitalisation of revenue expenditure. Linking to our risk of misstatements due to fraud and error, we have considered the capitalisation of revenue expenditure on Property, Plant and Equipment as a specific area of risk.	We did not identify any material issues or unusual transactions to indicate any misreporting of the Group's financial position through the inappropriate capitalisation of revenue expenditure.

Financial Statement Audit (continued)

Other Key Findings	Conclusion
Valuation of Property, Plant and Equipment Property, plant and equipment (PPE) represents a significant balance in the Group's accounts and are subject to valuation changes, impairment reviews and depreciation charges. Material judgemental inputs and estimation techniques are required to calculate the year-end asset property valuations held on the balance sheet. The Group engages property valuation specialists to determine asset valuations and small changes in assumptions when valuing these assets can have a material impact on the financial statements. ISAs (UK and Ireland) 500 and 540 require us to undertake procedures on the use of experts and assumptions underlying fair value estimates. Due to our detailed risk assessment of PPE valuations, we engaged EY valuation specialists to assist the audit team on a sample of assets, due to the fact that we determined there is a higher degree of risk for their valuations as at 31 March 2020.	Based on our procedures, our internal valuers (EYRE) has raised an observation on the valuation assumptions for the Wootton Hall HQ building. Whilst there is merit to suggest that this is an office building which should be valued using market-based inputs rather than through a DRC approach, we do not consider there to be sufficient comparable evidence to support the Specialist's adoption of a straight comparable approach on a capital value per sq. ft. basis. Therefore, a DRC approach would be a more appropriate methodology. Based on the scope of work, our recalculations indicated that the Group's Specialist's concluded value of £8,800,000 is still with in our acceptable range. Therefore, the fair value of Wootton Hall is still considered to be supportable, however is towards the upper end of our expected range. Considering the above observation from our EY specialists, the management has agreed to present enhanced disclosures in the financial statements. The extract of the agreed enhanced disclosure wording is copied below; *"The land & buildings under property, plant and equipment (as disclosed in Note 18) includes the Force's headquarter (Wootton Hall Park) amounting to £8.8m valued as of 31 March 2020 using the capital value per square feet. Whilst the Market approach (or an income approach) is typically appropriate for office buildings, Wootton Hall Park is not a typical office building as it has been adapted for the Police's use with ancillary facilities. The size and nature of the property makes it difficult to find directly relevant comparables of recent sales transactions in Northamptonshire. Accordingly, Direct Replacement Cost (DRC) valuation method could have been an alternative approach to value the asset at the year end. However the value calculated using DRC would not be materially different from market approach.* *The capital values per square feet used in the valuation range from £35.25 to £106.83. As the overall value of this asset depends upon the per square feet values, an increase or decrease of 5% in these per square feet values would result in an increase or decrease in overall asset value by an amount of £425,000."*

Financial Statement Audit (continued)

Other Key Findings	Conclusion
Pension liability valuation and disclosures	The accounting entries and disclosures are in line with our expectations and the Code and agree to the IAS19 report, with differences not material to the financial statements. These differences are not adjusted in the financial statements as the management does not consider those differences to be material for financial statements. Below is the list of these unadjusted audit differences in CC accounts, which has similar impact on the Group accounts; 1. Authority's share of overstatement of level 3 assets as reported by the pension fund auditor, resulting in reduction of pension liability and increase in actuarial gain for current period with an amount £328K. This also has respective impact on pension reserves and MIRS with the same amount in Equity 2. Variance due to difference % returns reported by pension fund auditor compared to actuary report, resulting in reduction of pension liability and increase in actuarial gain for current period with an amount £859K. This also has respective impact on pension reserves and MIRS with the same amount in Equity 3. Variance due to difference in benefits paid as per the NPF audit report and estimate made by actuary in their report with an amount £1,226K, however it does not have any impact on pension liability and respective actuarial gain/loss as it is just a difference in disclosure
Going concern disclosures	In light of the unprecedented nature of Covid-19, its impact on the funding of public sector entities and uncertainty over the form and extent of government support, we requested management a documented and detailed consideration to support management's assertion regarding the going concern basis and particularly with a view whether there are any material uncertainties for disclosure. We obtained the going concern management assessment, supporting evidence and disclosure notes from PFCC and CC. This included corroborating the cashflow forecasts to end of June 22, obtaining explanations for any unusual spikes in expected funding and payments. We also obtained the 21-22 budget, outturn reports, medium term plan and reserves strategy to corroborate management's forecasts on reserves and their forecasts on unexpected costs and demands being faced post Covid-19. Once we completed our review, we complied with our internal consultation processes in relation to whether our audit opinion will need to include an emphasis of matter in relation to the going concern disclosures in the Group's accounts. As a result of our review of disclosures and relevant supporting documents/information, in conjunction with our internal consultation process, we have concluded that management's assumptions on going concern are adequate, reasonable and supportive. We did not include an emphasis of matter paragraph in our audit opinion.

Financial Statement Audit (continued)

Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	We determined planning materiality to be 2% of gross expenditure reported in the accounts. Our materiality levels for PFCC, CC and the Group (as communicated in our Audit Planning Report & Audit Results Report) are as below; • PFCC – Planning Materiality £1.632m, Performance Materiality (or Tolerable Error) £1.224m, Audit Differences £81,582 • CC - Planning Materiality £4.114m, Performance Materiality (or Tolerable Error) £3.085m, Audit Differences £205,682 • Group - Planning Materiality £4.579m, Performance Materiality (or Tolerable Error) £3.434m, Audit Differences £228,953
Reporting threshold	We agreed with the Joint Independent Audit Committee that we would report to the Committee, PFCC and CC all audit differences in excess of the amounts as detailed above.

We evaluate any uncorrected misstatements against both the quantitative measures of materiality discussed above and in light of other relevant qualitative considerations.

Section 4

Value for Money

Value for Money

We are required to consider whether the Group has put in place 'proper arrangements' to secure economy, efficiency and effectiveness in its use of resources. This is known as our value for money conclusion.

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

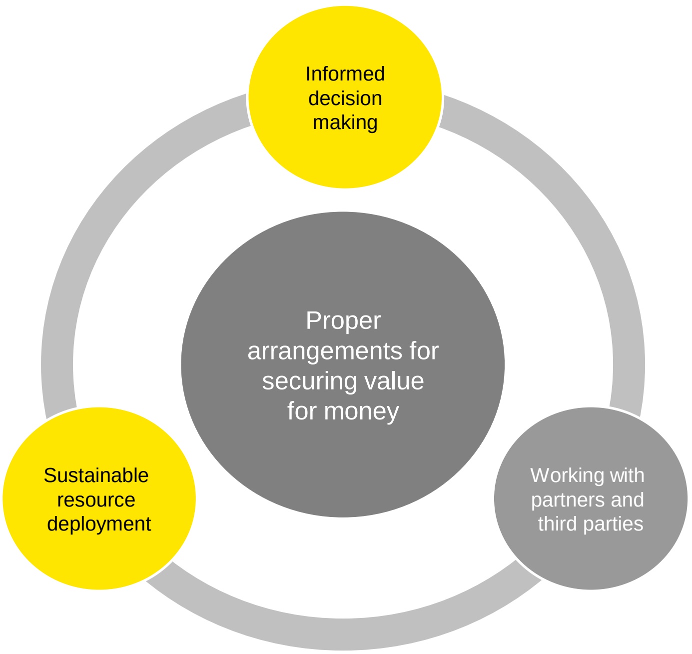
- Take informed decisions;
- Deploy resources in a sustainable manner; and
- Work with partners and other third parties.

On 16 April 2020 the National Audit Office published an update to auditor guidance in relation to the 2019/20 Value for Money assessment in the light of Covid-19. This clarified that in undertaking the 2019/20 Value for Money assessment auditors should consider local authorities response to Covid-19 only as far as it relates to the 2019-20 financial year; only where clear evidence comes to the auditor's attention of a significant failure in arrangements as a result of Covid-19 during the financial year, would it be appropriate to recognise a significant risk in relation to the 2019-20 VFM arrangements conclusion.

We identified one significant risk around these arrangements for Multi-Force Shared Services (MFSS) - Adequacy of arrangements for governance and risk management on the implementation of Project Fusion.

We reported our findings in detail as part of the Audit Results Report and do not repeat these here.

We performed the procedures outlined in our audit plan. We did not identify any significant weaknesses in the Group's arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. Therefore we issued an unmodified Value for Money opinion.



Section 5

Other Reporting Issues

Other Reporting Issues

Whole of Government Accounts

We are required to perform the procedures specified by the National Audit Office on the accuracy of the consolidation pack prepared by the Group for Whole of Government Accounts purposes.

The Group is below the specified audit threshold of £500m. Therefore, we were not required to perform any audit procedures on the consolidation pack.

Annual Governance Statement

We are required to consider the completeness of disclosures in the Group's annual governance statement, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading.

We completed this work and did not identify any areas of concern.

Report in the Public Interest

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the Group or brought to the attention of the public.

We did not identify any issues which required us to issue a report in the public interest.

Written Recommendations

We have a duty under the Local Audit and Accountability Act 2014 to designate any audit recommendation as one that requires the Group to consider it at a public meeting and to decide what action to take in response.

We did not identify any issues which required us to issue a written recommendation.

Other Reporting Issues (cont'd)

Objections Received

We did not receive any objections to the 2019/20 financial statements from members of the public.

Other Powers and Duties

We identified no issues during our audit that required us to use our additional powers under the Local Audit and Accountability Act 2014.

Independence

We communicated our assessment of independence in our Audit Results Report to the Joint Independent Audit Committee in June 2021. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.

Control Themes and Observations

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.

Our audit did not identify any controls issues to bring to the attention of the Joint Independent Audit Committee, PFCC and CC.

Section 6

Focused on your future

Focused on your future

The NAO has a new Code of Audit Practice for 2020/21. The impact on the Group is summarised in the table below

Group responsibilities for value for money
The Group 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 the financial statements, the Group is required to bring together commentary on the governance framework and how this has operated during the period in a governance statement. In preparing the governance statement, the Group tailors the content to reflect its own individual circumstances, consistent with the requirements of the relevant accounting and reporting framework and having regard to any guidance issued in support of that framework. This includes a requirement to provide commentary on arrangements for securing value for money from the use of resources

Auditor responsibilities under the new Code
Under the 2020 Code we are still required to consider whether the Group has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. However, there is no longer overall evaluation criterion which we need to conclude on. Instead the 2020 Code requires the auditor to design their work to provide them with sufficient assurance to enable them to report to the Group a commentary against specified reporting criteria (see below) on the arrangements the Group 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 Group plans and manages its resources to ensure it can continue to deliver its services. ‣ Governance - How the Group ensures that it makes informed decisions and properly manages its risks. ‣ Improving economy, efficiency and effectiveness - How the Group uses information about its costs and performance to improve the way it manages and delivers its services.

Reporting on value for money
In addition to the commentary on arrangements, where we are not satisfied that the Group has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources the 2020 Code has the same requirement as the 2015 Code in that we should refer to this by exception in the audit report on the financial statements. However, a new requirement under the 2020 Code is for us to include the commentary on arrangements in a new Auditor's Annual Report. The 2020 Code states that the commentary should be clear, readily understandable and highlight any issues we wish to draw to the Group's attention or the wider public. This should include details of any recommendations arising from the audit and follow-up of recommendations issued previously, along with our view as to whether they have been implemented satisfactorily.

Focused on your future (continued)

The Code of Practice on Local Authority Accounting in the United Kingdom introduces the application of new accounting standards in future years. The impact on the Group is summarised in the table below.

Standard	Issue	Impact
IFRS 16 Leases	The CIPFA LASAAC Local Authority Accounting Board has recently announced the implementation of this standard will be deferred until the 2022/23 financial year. This is in response to the ongoing pandemic and the impact on local authority finance teams. The Board has indicated this will be for one year only and there is no intention to grant any further extensions based on lack of preparedness. Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet.	Whilst there is a further delay in implementation, it is clear is that the Group will need to undertake a detailed exercise to identify all of its leases and capture the relevant information for them. To ensure the readiness to implement the new IFRS 16, the Group must therefore consider that all lease arrangements are fully documented.

Section 7

Audit Fees

Audit Fees

As detailed in our Audit Results report, we have shared our proposed fee variation with management. Whilst, at this stage, the management agrees to some of the elements of our proposed additional fee, they do not agree with it all. We will continue to consider management's representations on the fee variation before we submit this to PSAA to determine. The additional fee is to reflect the factors as detailed below in relation to sustainability of our audit quality and additional risk based audit procedures we undertook in the 2019-2020 audit. PSAA will determine the final fee variation.

	Planned fee 2019/20	Scale fee 2019/20	Proposed Fee 2018/19
	£	£	£
Audit Fee – NPFCC	22,554	22,554	22,554
Audit Fee – CC	11,550	11,550	11,550
Additional fee	30,000 (See Note 2)	-	21,000 (See Note 1)
Total Audit Fee	**64,104**	**34,104**	**55,104**

All above fees amounts exclude VAT

Note 1:
PSAA has now determined a scale fee variation of £21,000 to reflect additional risk based audit procedures we undertook in the 2018-2019 audit. The proposed fee variation and rationale was reported in our 2018-2019 Audit Results to the March 2020 Joint Independent Audit Committee.

Note 2:
As we are in an unprecedented period of change, a combination of pressures are impacting Local Audit and has meant that the sustainability of delivery is now a real challenge. This has required us to revisit with PSAA the basis on which the scale fee was set which we reported in the Audit Plan.

There are a number of audit areas which now require us to invest more time and efforts, especially considering the current environment impacted by COVID-19. There is an ever increasing FRC challenge which requires us to invest more in time, people and technology to sustain the quality of audit, resulting an increase in overhead costs. Higher inherent risks, especially in relation to the valuation of PPE, Pensions and Group accounting, present more challenge for us to increase our focused efforts.

We will be submitting to PSAA a scale fee variation of £30,000 to reflect additional fee for 2019/20 audit. Our fee has been impacted by a range of additional risks including (but not limited to):

- The impact of Covid-19 requiring us to perform additional disclosures to address wider additional risk in different areas of audit.
- Significant audit risks on PPE valuations and involvement of our EY specialists.
- New system implementation (Oracle Fusion) - additional procedures performed to ensure accuracy & completeness of opening balances transferred to new system;
- Availability of Quality/timely information for some account balances;
- Additional work to address significant risk surrounding VFM (especially in context of prior year modified opinion); and
- Going concern assessment and consultation procedures.

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ED None

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