

Wolverhampton City Council

OPEN INFORMATION ITEM

Audit Committee

Date **18 July 2011**

Originating Service Group(s)

DELIVERY

Contact Officer(s)/

PAT MAIN

Telephone Number(s)

4410

Title

EXTERNAL AUDIT UPDATE REPORT

RECOMMENDATION

That the report be received.

EXTERNAL AUDIT UPDATE REPORT

1. PURPOSE

- 1.1 The Council's external auditors, PricewaterhouseCoopers (PwC) presented their 20010/11 Audit Plan to the Audit Committee on 20 December 2010. The purpose of the report attached at Appendix 1 is to:
- update Members of the Committee on their progress in delivering their Audit Plan;
 - consider PwC's approach to the risk of fraud; and
 - inform Members about some recent publications from PwC's Public Sector Research Centre.

2. BACKGROUND

- 2.1 Representatives from PwC will be in attendance at the meeting to present their report and to respond to Members' questions.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications arising directly from PwC's report. The costs are included within the agreed annual fee fro provision of external audit services.
[PM/11072011/D]

4. LEGAL IMPLICATIONS

- 4.1 Nil.
[MW/11072011/Z]

5. EQUAL OPPORTUNITIES IMPLICATIONS

- 5.1 There are no equal opportunities implications arising from this report.

6. ENVIRONMENTAL IMPLICATIONS

- 6.1 There are no environmental implications arising from this report

7. SCHEDULE OF BACKGROUND PAPERS

External auditor working papers and reports, PricewaterhouseCoopers

Wolverhampton City Council

External Audit Update

July 2011



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Code of Audit Practice and Statement of Responsibilities of Auditors and of Audited Bodies

In March 2010 the Audit Commission issued a revised version of the ‘Statement of responsibilities of auditors and of audited bodies’. It is available from the Chief Executive of each audited body and on the Audit Commission’s [website](#).

The purpose of the statement is to assist auditors and audited bodies by explaining where the responsibilities of auditors begin and end and what is to be expected of the audited body in certain areas.

Our reports are prepared in the context of this Statement. Reports and letters prepared by appointed auditors and addressed to members or officers are prepared for the sole use of the audited body and no responsibility is taken by auditors to any Member or officer in their individual capacity or to any third party.

Section 1 – Introduction and Executive Summary

Introduction

We presented our 2010/11 Audit Plan to the Audit Committee on 20 December 2010. The purpose of this paper is to:

- update you on our progress in delivering our Audit Plan;
- consider our approach to the risk of fraud; and
- inform you about some recent publications from our Public Sector Research Centre.

Audit Progress

We are making good progress against our audit plan and in particular we have:

- Completed our interim audit fieldwork which focussed on reviewing the work of internal audit and assessing the Council's key controls;
- reviewed the Council's arrangements for transferring its Council Tax and NNDR data to the updated Northgate System;
- reviewed the Council's general Information Technology (IT) control environment; and
- reviewed regularly the Council's progress in implementing International Financial Reporting Standards ("IFRS").

Based on our work to date we have concluded that:

- good progress has been made with the control and compliance issues we reported last year, particularly on data transfer management, the payroll system and key system reconciliations;
- the transfer of Council Tax and NNDR data to the Northgate System appears to have been effectively managed and controlled;
- we can rely on the work of Internal Audit on the Council's key financial systems as planned;

Your Internal Auditors reported significant control weaknesses in contract related systems and processes. We discussed this with the Section 151 Officer who shared the steps taken by the Council to review and improve this area. We are meeting the improvements project manager to understand this in greater detail.

IFRS implementation has been a significant challenge for the Council. Investigating and accounting for the Council's lease arrangements have proved particularly complex and difficult. We anticipate however that the Council will be prepared for its accounts to be audited on an IFRS basis as planned on 11 July 2011, the first day of our final audit.

In the next section of this report we set out in further detail our progress against each of the risk areas identified in our Audit Plan.

Fraud Risk

Our Audit Plan set out how we would respond to the risk of revenue/expenditure recognition, and management override of controls. It is important that the Audit Committee has an opportunity to share its views on the risk of fraud with us. How are you assured that the risk of fraud at the Council has been effectively mitigated?

Recent PwC Publications

This paper highlights some recent publications that may be of interest to the Audit Committee and Council.

Section 2 - 2010/11 Audit Update

Update on Risks

We detail below our progress against the risks set out in our Audit Plan:

Audit Plan Risk	Progress and Issues noted	Remaining action
<p>Savings and financial standing</p> <p>The Comprehensive Spending review announced that the level of Government funding for local authority revenue expenditure at the national level will reduce by 26% in real terms over the next four years.</p> <p>Whilst this is broadly in line with assumptions made in your plans, the unexpected front-loading of cuts to the Formula and Area Based Grants have contributed to a budget gap for 2011/12 of £7.6 million (as at the 1 November Cabinet meeting) with further details on grants and allocations expected to emerge during the year. The projected budget deficit over the next five years is currently over £70 million.</p> <p>Given the significant volume of national policy announcements and the radical re-organisation in the delivery of services within the Council it is highly probable that other risks to the financial standing of the Council will be identified over the next few months.</p>	<p>We have met with the CEO and S151 Officer quarterly and discussed the Council's financial position and reviewed key finance reports.</p> <p>As part of our interim audit, we have also considered the budget setting and monitoring procedures in place at the Council.</p> <p>We have completed a Financial Resilience survey and concluded that the Council had appropriate measures in place to set its 2011/12 budget. In undertaking this survey we considered key financial reports and governance arrangements and concluded that:</p> <ul style="list-style-type: none"> • the Council's senior leadership understand the financial management challenges facing the organisation; • members are appropriately involved in the process; • there has been an adequate level of challenge and scrutiny to the 2011/12 budget; and • senior officers and members are provided with adequate budgetary information to allow sufficient challenge and scrutiny to the Council's financial performance. 	<p>We will continue to meet with the CEO, S151 Officer and other Directors to discuss the financial performance of the Council.</p> <p>During the final audit in July we will complete our review of the Council's medium term financial plans. We will report our findings back to the Section 151 Officer and Audit Committee. We will:</p> <ul style="list-style-type: none"> • test your assumptions; • Benchmark them against other Authorities; • identify how savings plans are to be realized; • review cost reduction project and programme controls; • consider the Council's reserve balances; and • consider the financial standing of the Authority.
<p>Service redesign and restructure</p> <p>The Council is considering a significant organisational restructure.</p> <p>The proposed structure has three Strategic Directors, one Assistant Chief Executive (which together with the Chief Executive, Section 151 Officer and Monitoring Officer forms a Strategic Executive Board) and ten Assistant Directors. Each directorate would have a specific focus: Delivery (including support and day to day</p>	<p>We have met quarterly with the CEO and S151 Officer and discussed progress with the service redesign and restructure.</p> <p>During November 2010 we undertook a high level review of the proposed structure and fed back our initial observations. We did not have any significant concerns at this point, but did raise a number of queries in relation to the role of the S151 Officer.</p>	<p>We will continue to meet with the CEO, S151 Officer and other Directors of the Council to monitor the impact of the restructure.</p> <p>We will review the Council arrangements for managing its 'Improvement Programme'. A meeting with the Assistant Chief Executive is scheduled for July on this matter.</p>

Audit Plan Risk	Progress and Issues noted	Remaining action
<p>services); Community (including support for vulnerable adults and children), and; Education and Enterprise (including regeneration, skills and learning).</p> <p>The proposed structure has the Head of Internal Audit reporting to the Assistant Chief Executive. The Chief Executive has consulted with us on these arrangements and we have concluded that there is nothing in the proposed restructure that is clearly contrary to statute.</p> <p>It is important however that the effectiveness of any new arrangements is monitored closely to ensure it works in practice. Careful change management is required. In particular, measures need to be put in place to ensure that there is no weakening in internal control (including budgetary control) during any change.</p>	<p>We subsequently reviewed the Cabinet Paper dated 8 December 2010 and entitled 'leading for a stronger city' and concluded that there was nothing in this paper that was clearly contrary to statute. We also noted that the Section 151 Officer was to sit on the Strategic Executive Board.</p> <p>In May, the CEO wrote to us setting out the Council's proposed course of action with regard to a small number of redundancies. We considered the information provided to us in the context of our audit responsibilities and concluded that we would not be minded to challenge the proposed course of action.</p> <p>We have considered the impact of these changes on the operation of the Council's internal controls. Based on our interim audit procedures and discussions with the CEO, Section 151 Officer and other key officers we have not identified any concerns to bring to your attention.</p>	
<p>2010/11 – the first year of reporting under IFRS</p> <p>The transition to IFRS involves both new and considerably revised financial statements and an increase in the depth of disclosures required in the notes to the accounts. There is a risk of material errors in the restatements and reclassifications required in preparing the accounts in their new format and of material omissions of information required to be disclosed by the new Code of Practice on Local Authority Accounting.</p> <p>Our early work has identified that the Council is broadly on track with its own timetable. However, this timetable did leave a number of the more significant tasks to the last six months of the financial year and there remains some risk in relation to leases due to the volume of work required and the limited capacity within the finance team.</p>	<p>We assessed the Council's readiness for IFRS conversion in January / February 2011 and reported our findings to the Section 151 Officer. At that time we concluded that there remained a significant amount of work still to do in order to meet the timetable, particularly with regard to lease arrangements and fixed assets.</p> <p>We have since continued to liaise with the Section 151 Officer and the Finance Team on matters raised within our readiness assessment. We carried out further fieldwork during April, May and June in order to gauge the Council's progress on IFRS, particularly in relation to the restatement of the 2010/11 opening balance sheet. On 14 June 2011 we reported to the Section 151 Officer that significant progress had been made since March but that some further work (at that point) still needed to be done, particularly on leases.</p>	<p>During our final audit visit in July we will test the first full set of IFRS accounts. One of our IFRS experts will perform an independent 'hot review' of the financial statements (including disclosures) to consider whether the requirements of IFRS have been met.</p> <p>We will continue to work closely with the Council on IFRS to resolve any accounting issues promptly during our final audit procedures.</p> <p>We will report the findings of all our work on IFRS to the Audit Committee within our ISA 260 Report.</p>

Audit Plan Risk	Progress and Issues noted	Remaining action
<p>Axon</p> <p>The Authority has commissioned an independent review into matters surrounding the proposed partnership with Axon Solutions Ltd. We understand that the first part of the review, to scope the work required, has only just been completed.</p> <p>It is essential that the Authority understand and learn from this matter. We will review the progress the Authority has made in learning from this programme before the end of March 2011 as part of our 2010/11 audit, and will issue a public report if this appears necessary at that point.</p>	<p>We have reviewed the scope of the independent review into matters surrounding the proposed partnership with Axon Solutions Ltd.</p> <p>In May we met with the review team. Based on these discussions we are satisfied that the Council is making progress in learning from this matter. It does not therefore appear necessary for us to issue a public interest report at this time. We await the results of this review, which we understand will be available by September this year.</p>	<p>We will consider the outcome of the independent review, the lessons that need to be learned and any responses the Council has made in this respect.</p> <p>We will then consider whether there are grounds for us to take further action, including considering a public interest report.</p>
<p>Internal control weaknesses</p> <p>We reported in our 2009/10 Audit Letter that while we found no material weaknesses in the Authority's systems of internal control there have been a number of failings in key initiatives which suggest that control needs improvement.</p> <p>Our attendance at Audit Committees has also confirmed to us that those charged with governance are not getting all the assurances that they require against the range of risks that the Council faces. In addition, we have become concerned of the number of internal audit reports that identify control weaknesses in sufficient number or sufficient severity that the systems they cover are deemed weak or unsatisfactory.</p>	<p>We have reviewed the work of internal audit to assess key controls over the major financial systems at the Council. We are pleased to report that progress has been made to address control compliance issues reported to management in the previous financial year, particularly with regard to:</p> <p>data transfer management, the payroll system; and key system reconciliations</p> <p>There remains room for improvement however in some areas. The authorised signatory listing in particular was found to be an ineffective control due to accuracy and completeness issues.</p> <p>A number of weaknesses in the Council's contract and procurement related controls have been identified and as a result a review of this area was commissioned by the Council in December 2010. We will consider the findings of this review as part of our final audit procedures.</p> <p>We have working with Internal Audit in the development a high level analysis of how money is spent in the Council, and how assurance is gained with regard to this spend. We anticipate that this 'financial assurance map' will be a helpful tool for the Audit Committee.</p>	<p>During July we will meet with key officers to consider the steps taken by the Council as a result of weaknesses identified in its contracting and procurement processes.</p> <p>In partnership with Internal Audit we will develop a high level analysis of how money is spent in the Council which maps across to how assurance is gained on this spend.</p> <p>We will consider the outcome of our final audit detailed testing on the Council's accounts and feedback any significant control matters to the Audit Committee.</p>

Audit Plan Risk	Progress and Issues noted	Remaining action
<p>System changes for Collection Fund Accounting</p> <p>During 2010/11 accounting for Council Tax and National Non Domestic Rates was transferred to the Northgate system. Last year accounting for housing rent was also transferred from the Council's mainframe system to the Northgate system. This was a relatively large and complex system change yet the transfer was not effectively planned or implemented and we reported a number of control weaknesses relating to the system change to members.</p>	<p>Involving our IT audit specialist we reviewed the scope of Internal Audit's work into the transfer of Council Tax and NNDR data to the Northgate System. The scope of this work appeared robust and we identified no concerns. We subsequently reviewed Internal Audit's work in this area and its findings. On the basis of this review we concluded that the Council's arrangements for migrating data between old and new systems were sound.</p>	<p>As part of our final audit, we will review key reconciliations between Northgate and the general ledger.</p>
<p>Partnership management</p> <p>Local authorities are being given greater encouragement to work in partnership with other parts of the public services and the private and voluntary sectors. The authority is in partnership with Wolverhampton Homes and has entered into a significant partnership to deliver the Building Schools for the Future (BSF) programme.</p>	<p>We have issued 'group auditor instructions' to the external auditors of Wolverhampton Homes (WH). This requests audit information to be provided to us in relation to WH for the purposes of our (group) accounts audit opinion.</p>	<p>We will review the Council's working papers around group boundaries as part of our IFRS restatement audit.</p> <p>During our final audit, we will review the disclosure of the partnership arrangements to ensure it is in line with the CIPFA Code.</p> <p>We will continue to coordinate our work with the auditors of Wolverhampton City Homes.</p>
<p>Local Improvement Finance Trust</p> <p>A September 2010 Cabinet Report updated members regarding 6 new health and social care centres that the Council had been planning to develop with Wolverhampton City Primary Care Trust under the Local Improvement Finance Trust (LIFT) arrangements.</p> <p>As a result of a national decision to abolish PCTs, the Council has needed to explore alternative delivery options.</p>	<p>We have discussed the issues around the LIFT with senior management at the Council.</p>	<p>As part of our final accounts audit in July we will consider the impact on the financial statements, including whether there have been any abortive capital costs that need to be reversed out through revenue.</p>

Audit Plan Risk	Progress and Issues noted	Remaining action
<p>The Carbon Reduction Commitment</p> <p>The Carbon Reduction Commitment (CRC) Energy Efficiency Scheme is a regulatory incentive to improve energy efficiency in large public and private sector organisations and reduce the amount of carbon dioxide (CO₂) emitted in the UK through a combination of financial and reputations risks and rewards. The scheme is mandatory and organisations meeting specific qualification criteria based on their electricity supply in 2008 are obliged to participate. You meet the criteria for participation and have registered for the scheme.</p> <p>As part of the Spending Review 2010 it was announced that the scheme will be simplified to reduce the burden on businesses. Full details have not yet been released, but the main change was that revenues from allowance sales totalling £1bn a year by 2014-15 will be used to support the public finances rather than being recycled to participants.</p> <p>There is therefore a financial and reputational risk to the Council from non-compliance with the schemes rules or from failing to reduce emissions.</p>	<p>Since the date of our Audit Plan the Government has further clarified and simplified the regulations concerning CRC. The Council is now no longer required to purchase allowances to cover its 2010/11 emissions. This means that the associated complex accounting arrangements for 2010/11 are no longer in place.</p> <p>We met with the responsible officers for CRC and performed a high level health check of your monitoring and data systems.</p> <p>No significant issues were noted, however the Council should ensure that a reasonable estimate of expenditure for 2011/12 is incorporated in the 2011/12 budget and the MTFS.</p>	<p>As part of our final audit work, we will investigate whether the Council has appropriate budget arrangements in place in relation to the future costs of the scheme.</p>

Reporting misstatements

ISA (UK&I) 450 (revised) requires that we record all misstatements identified except those which are “clearly trivial”. Historically, we have reported any unadjusted misstatements greater than £1,000 for the attention of the Audit Committee. We have discussed the potential threshold with the Section 151 Officer and as a result we are proposing a level of £100,000. However, we would welcome the Committee’s views on an appropriate level of reporting of errors identified during the audit.

Non Audit Services

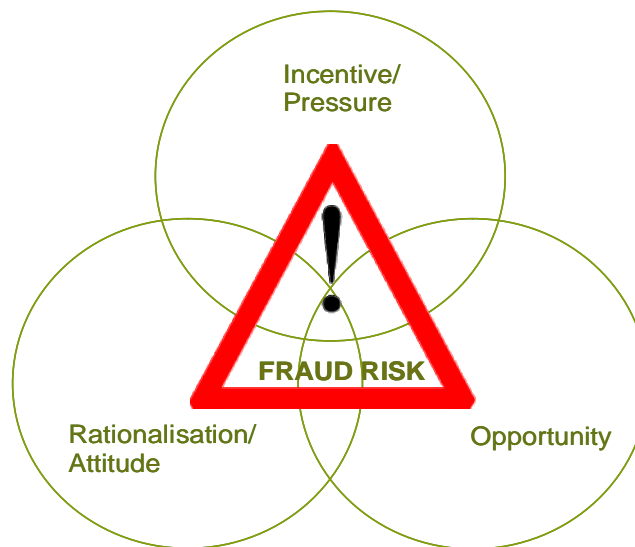
PwC has during the year undertaken an accelerated property review at the Council which has produced a range of options of how to release cost savings and optimise estate performance. The first phase of this work has been completed at a cost of £49,000. The second phase of this work, the planned fee for which is £89,000 is ongoing. We confirm to you that we have appropriate safeguards in place to maintain our audit independence. Furthermore we can confirm that we sought and received specific approval to undertake this work from the Audit Commission.

PwC also during the year completed a review of the Council’s Internal Audit function and also a review of the Council’s job evaluation processes. The fees for these reviews were £31,143 and £14,944 respectively. We confirm to you that we have appropriate safeguards in place to maintain our audit independence. We were not required gain specific approval to undertake these reviews from the Audit Commission on the basis that the combined fees were below 20% of the audit fee.

Section 3 - Communications about fraud risk

Initial assessment of fraud risk

We are required under ISA 240 “The auditor’s responsibility to consider fraud in the audit of financial statements”, to explicitly consider fraud as part of our audit procedures. Three conditions generally are present when fraud occurs:



1. management or other employees have an incentive or are under pressure that provides a reason to commit fraud (e.g. pressure to meet targets or hold position);
2. circumstances exist (e.g. the absence of controls, ineffective controls, or the ability of management to override controls) that provide an opportunity for a fraud to be perpetrated; and
3. those involved are able to rationalise a fraudulent act as being consistent with their personal code of ethics or possess an attitude, character, or set of ethical values that allow them to knowingly and intentionally commit a dishonest act.

Although it is not our primary responsibility to detect fraud, our audit procedures seek to identify material misstatements resulting from fraud. The likelihood of not detecting a material misstatement resulting from fraud is higher than the likelihood of not detecting a material misstatement resulting from error; fraud may involve collusion and be supported by sophisticated and carefully organised schemes designed to conceal it.

From wider discussions with both our corporate and public sector clients, we have noted that as the UK economy goes through recession the pressure increases on employees. In such times the risk of fraud becomes much increased and we included two fraud risks in our audit plan as follows:

Audit plan risk	Examples of how this could occur	Work performed
<p>Revenue and Expenditure Recognition</p> <p>There is a risk that the Council could adopt accounting policies or treat income and expenditure transactions in such a way as to lead to material misstatement in the reported revenue position.</p> <p><i>We are required by auditing standards to consider this risk as a significant risk as part of our audit approach.</i></p> <p><i>Given that the Council is experiencing increased pressures on many of its budgets as economic conditions have worsened, there is the potential for budget holders to feel under more pressure than normal to try to push costs into future periods, or to miscode expenditure intended for different purposes.</i></p>	<p>In any organisation there is a risk of incorrectly recognising either revenue or expenditure.</p> <p>The incentive may be derived from financial pressure or the need to operate within budgets.</p> <p>For example, fraud could manifest itself through:</p> <ul style="list-style-type: none"> • recognising income in an incorrect period; • raising provisions against accounts receivable which are not reasonable; or • raising accruals which do not relate to expenditure which has occurred in the year to date. 	<p>We have evaluated your revenue and expenditure controls and concluded that they are generally operating effectively. We have reviewed the work of internal audit and did not identify any material issues.</p> <p>As part of our final accounts audit we will evaluate the accounting policies for income and expenditure recognition and test:</p> <ul style="list-style-type: none"> • the appropriateness of journal entries and other adjustments; and • accounting estimates for provisions, expenditure, deferred revenues and income. <p>Our final accounts audit procedures will also include detailed tests aimed at ensuring items are recorded in the correct financial year.</p>
<p>Management Override of Controls</p> <p>In any organisation, management may be in a position to override the financial controls that you have in place. A control breach of this nature may result in a material misstatement.</p> <p>For all of our audits, we are required to consider this significant risk and adapt our audit procedures accordingly.</p> <p><i>We are required by auditing standards to consider this risk as a significant risk as part of our audit approach.</i></p> <p><i>Given the increased pressures on many of the Council's budgets, there are risks that the requirement to report particular financial results overrides best financial practice.</i></p>	<p>There will always be a risk of management overriding controls in any organisation.</p> <p>Typically this might occur where segregation of duties have broken down or collusion is present. The sort of areas which are susceptible to this type of fraud include:</p> <ul style="list-style-type: none"> • Manual journals; and • Key estimates and assumptions such as asset valuations, provisions and accruals. 	<p>We will perform final audit procedures in relation to:</p> <ul style="list-style-type: none"> • the appropriateness of journal entries and other adjustments; • accounting estimates; and • the business rationale for significant transactions. <p>Our audit procedures are also planned to include an unpredictable element that varies year on year.</p> <p>We will consider the steps taken by the Council to improve its contract related controls (in response to the issues identified by the Council's Internal Auditors in December 2010). We will consider what the implications of this work are to the Council's arrangements for detecting and preventing fraud and corruption.</p>

It is important that the Audit Committee has an opportunity to share its views on the risk of fraud with us. How are you assured that the risk of fraud at the Council has been effectively mitigated?

Section 4 - Recent Publications

As part of our regular reporting to you, we plan to keep you up to date with the emerging thought leadership we publish. The PricewaterhouseCoopers Public Sector Research Centre (PSRC) produces a range of research and is a leading centre for insights, opinion and research on best practice in government and the public sector. We have highlighted some recent publications that may be of interest to the Council below:

Creating auditor choice

Following the announcement of the demise of the Audit Commission, this Talking Points considers what role audit plays in the public sector today and explores what the benefits of auditor choice will be to public sector organisations and the public at large.

Public sector organisations will be given a choice in selecting their own auditors, providing better value for money and greater transparency of public spend for the general public.

Making your Property Work Harder:

The 2010 Spending Review set out far-reaching spending cuts across the public sector and has placed unprecedented financial pressure on local authorities. With local government facing funding cuts of around 26%, there is an expectation that they find savings from property while protecting the front-line.

Contrary to popular opinion, once the schools portfolio is stripped out and depressed market prices are factored in, there is not an excess of council property. Asset sales over the last 30 years have funded significant capital programmes and releasing buildings from the operational estate is no longer easy. The straightforward deals are done and the low-hanging fruit long since picked.

If public sector bodies are to avoid 'slash and burn' with the inevitable consequences for service delivery, a more challenging approach to property rationalisation that is tied to service redesign is required. This approach challenges services' dependency on assets and explores new channels of delivery.

This publication outlines how the importance of a mature property function and how property should be rationalised to drive out efficiencies in local government.

Capable Communities: Towards Citizen-Powered Public Services

Everyone is talking about the 'Big Society' as part of the next stage of public service reform, but much of the discussion to date has been abstract rather than practical. Getting citizens more involved in the design and delivery of public services has real promise as a way of empowering citizens, improving outcomes and providing better value for money. But we need to understand much better how this agenda can be translated into practice. This report asks how, in practical terms, citizens can act together to improve the way public services work for them. This can involve individuals volunteering their time to help others, but it is also about empowering people to help themselves.

Standardising processes, improving performance

Information Technology (IT) is vital to the workings of local government and underpins all of the services that councils deliver. However, the IT that supports day to day processes and activities is often needlessly complex and fails to deliver service improvements or meaningful productivity gains. In addition, despite the significant spend on IT infrastructure during the boom years of e-government, this investment has failed to deliver some of the predicted benefits of improved business processes and ready access to both information and services for customers and employees alike.

Despite this current state of play, we are optimistic for the future. We believe that the right IT will underpin more efficient operating models for councils in the future. In addition, we estimate that councils could decrease their total cost of IT by up to 20% (based on PwC's work with councils undertaking this type of transformation journey). This can be achieved while maintaining or improving services, based on our experience of transformation work at over 40 organisations, where IT simplification is seen as a key enabler.

In this Talking Points publication we explore how councils can break out of the current vicious cycle, which leads to higher IT costs, and demonstrate how councils can simplify IT requirements to create simpler, more cost effective IT environments that support improved standard processes and models of working.

We agreed that if the Council is asked under the Freedom of Information Act 2000 to disclose anything in this report, it will let PwC know promptly and discuss the request before disclosing. The Council agrees to consider our views, and apply relevant exemptions under the Act. If the Council then makes a disclosure, it will make sure it includes in full any disclaimer already in the document or requested.

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