

Audit Committee

Time	2.00 pm	Public Meeting?	YES	Type of meeting	Regulatory
Venue	Committee Room	3 - Civic Centre, St F	Peter's Sq	uare, Wolverhampton	WV1 1SH

Membership

Chair	Cllr Keith Inston (Lab)		
Vice-chair	Cllr Christine Mills (Con)		

Labour

Conservative

Cllr Harbans Bagri Cllr Philip Bateman Cllr Alan Bolshaw Cllr Dr Michael Hardacre Cllr Jasbir Jaspal

Cllr Wendy Thompson

Mr Mike Ager Mr Terry Day

Independent Member

Quorum for this meeting is two Councillors.

Dear Councillor/ Independent member

I am now able to enclose, for consideration at next Monday 14 July 2014 meeting of the Audit Committee, the following report that was not available when the agenda was printed.

Item No. Title

9a **External Audit Progress Report 2013/14** (Pages 1 - 16) [To receive the report]

Information for the Public

If you have any queries about this meeting, please contact the democratic support team:

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Wolverhampton WV1 1RL

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Wolverhampton City Council External Audit Progress Report 2013/14

July 2014



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

1. Introduction and Executive Summary

We have pleasure in updating you of our progress in delivering our Audit Plan. A major element of our work was undertaken during our 'interim audit visit' which focused on key controls – including IT related controls. Our final accounts audit will take place during August 2014.

We are pleased to report that our interim audit progressed well. In particular, as planned we have:
successfully updated our assessment of audit risk (below we provide details on planned changes to our approach);

- gained the planned level of assurance over your key financial systems and processes (though see comments below in respect of our IT audit work); and
- tested and validated a number of transactions and balances within the 2013/14 accounts.

Audit progress

Our interim audit took place during April 2014. The purpose of our interim visit was to:

- 1. Update our **assessment of risk** (as documented within our Audit Plan presented to you in March 2014) through discussing audit risks and mitigating controls with management. *This ensures a robust and properly targeted audit approach to provide the assurances needed over specific balances and risks*.
- 2. Understand, evaluate, and where effective and efficient to do so validate **key controls** operating around the Council's key business cycles. *Reviewing the design and operation of controls informs our risk assessment process and impacts on the nature and extent of substantive testing that we undertake.*
- 3. Undertake early **substantive testing** in specific areas (e.g. payroll costs, fixed asset base data). *Completing early detailed work enables prompt identification of issues and reduces pressure on the year end audit process.*

The key messages from our work to date are as follows:

Audit Area	RAG	Comments
Risk based audit work (per Audit Plan)	(G)	 We are making good progress against our plan. Our interim audit fieldwork took place as planned. Our work has been carried out with the help and support from the Finance Team and Internal Audit. We were able to evaluate the effectiveness of the control environment and place reliance on the work performed by Internal Audit. We identified no significant or material control weaknesses. We performed early substantive tests of detail on a small number of areas and identified no significant or material issues from this early testing. We are, therefore, able to continue our controls-based audit in line with our initial plan.
Value for money (VfM) work	(A)	• We have reviewed in-year finance reports and met regularly with the Section 151 Officer, the Strategic Director Delivery and the Chief

Audit Area	RAG	Comments		
		Executive to discuss the Council's financial position and plans.		
		• We have begun a detailed programme of work to challenge how robust the forecasts and assumptions in the MTFS are, in order to conclude whether the Council is financially resilient.		
		• We have reviewed the findings of a recent independent review of the process for developing the medium term financial strategy and budgeting which is due to be presented in full to a future meeting of the Audit Committee.		
		• We will continue to meet regularly with the Section 151 Officer to discuss the Council's financial position and receive updates to the savings programme and budget risk assessment.		
		• We will make a provisional assessment on the Council's financial resilience by early September and communicate this with Officers and Councillors through a separate report. We will continue to monitor this assessment up to the point of issuing our Value for Money (VFM) conclusion at the end of September.		
Information Technology (IT)		• Our IT specialists have reviewed your general IT control environment on the system that was used during 2013/14.		
Controls	(G)	• Our work focussed on access; program changes; and system and security settings within T system.		
		• We identified no material control weaknesses.		
		• We concluded that we can place reliance on the outputs as planned on the old system but we are yet to undertake our IT audit work in respect of your new finance system (Agresso). This includes the migration of data into the new system.		
Internal Audit		• Internal Audit completed their work in line with our agreed protocol.		
	(G)	• We reviewed their work on key financial systems and assured ourselves as to the quality.		
		• We concluded that we can place full reliance on the work performed.		

<u>Key</u>

- **R**ed significant improvements required
- Amber some improvements required
 - Green no or some minor improvements required

In the next sections of this report we set out in further detail our progress in delivering our plans.

2. Audit Plan risk update

Update risks and work undertaken – Financial Statements

Risk	Progress and issues noted	Remaining action
Management override of controls Significant risk • ISA (UK&I) 240 requires that we plan our audit work to consider the risk of fraud, which is presumed to be a significant risk in any audit. In every organisation, management may be in a position to override the routine day to day financial controls in order to manipulate the financial statements. Accordingly, for all of our audits, we consider this risk and adapt our audit procedures accordingly.	 We have: Considered the design and operating effectiveness of key controls within significant financial processes; reviewed the Council's draft accounting policies; and reviewed the Council's processes for raising and approving journals. We are also in the process of completing the following IT specific work: detailed testing of financially significant IT systems which underpin the Council's accounts; and testing financial system access controls. Based on our work to date: we have identified no significant or material weaknesses; and there are no issues that should impact on our planned audit approach. 	 We will undertake final accounts audit procedures including: testing the appropriateness of manual journal entries and other adjustments; reviewing accounting estimates for biases; evaluating the business rationale underlying significant transactions; testing exceptional and unusual items highlighted by the Council's bank account (and other) reconciliations; and performing unpredictable procedures.
Risk of fraud in revenue and expenditure recognitionSignificant risk●Under ISA (UK&I) 240 there is a presumption that there are risks of fraud in revenue recognition.We extend this presumption to the recognition of expenditure in local government.There is a risk that the Authority could adopt accounting policies or treat income and expenditure transactions in such a way as to lead to material misstatement	 We have: reviewed the work of internal audit relating to the income, debtors, expenditure and creditors business processes; considered the design and operating effectiveness of key controls operating in each of these processes; and reviewed the Council's draft accounting policies relating to income and expenditure. We have discussed with management our proposed approach to testing specific income and expenditure streams. 	 As part of our final accounts audit we will perform detailed testing of revenue and expenditure transactions, focussing on the areas we consider to be of greatest risk. Our testing will include procedures in relation to: the appropriateness of journal entries and other adjustments; the accounting treatments adopted and transactions processed for specific government grants; income and expenditure cut off; and

Risk	Progress and issues noted	Remaining action
in the reported revenue position.	 We have refined our testing approach as a result, to ensure a greater focus on the areas of greatest risk. Testing is to be completed during our final accounts audit. Based on our work to date: we have identified no significant or material weaknesses; and there are no issues that should impact on our planned audit approach. 	reviewing the accounting estimates for income, expenditure, deferred revenues and provisions.
Property, Plant and Equipment Valuation	We have held discussions with the finance team to understand the	As part of our final accounts audit we will:
Significant risk •	approach to revaluing the Council's estate in 2013/14.	 review and validate the keine indgements and
Property, Plant and Equipment is the largest figure on your Balance Sheet. You value your properties at fair value using a range of	We have engaged our internal valuation specialists to ensure appropriate input into the process. We have reviewed the Council's draft accounting policies with	 judgements and assumptions; complete our review of supporting data used; and assess the reasonableness
assumptions and the advice of internal and external experts. During the 2012/13 audit process we identified that out- of-date base data had been used in the valuation of some assets. We also identified	respect to the measurement and valuation of property, plant and equipment assets and identified no concerns. We have commenced our testing of the base data underpinning the revaluation exercise.	of any estimation techniques applied. Where assets are not re-value in year we will discuss with ye the steps you have taken to ensure that your balance shee is materially accurate at the
Academy schools on your balance sheet that should have been derecognised in prior periods. These findings resulted in a material net adjustment to the valuation of property, plant and equipment.	We have also considered controls in place to ensure the completeness and accuracy of asset values within the accounts, including management's response to control issues raised in the previous period. Our work to date on asset base data	year end. In respect of academy schools we will review the accounting treatment and corresponding valuation of schools that have achieved Academy status during 2013/14, and confirm
 Specific areas of risk for 2013/14 therefore include: asset valuation base data may be inaccurate or 	has generated some queries around the accuracy of data in respect of certain assets tested. We have discussed this matter with management who are investigating.	that these have been dealt wit in accordance with agreed accounting practice.
 the Authority's valuation assumptions may not be 	We will assess progress and revalidate the data during our final accounts audit.	
 assets' actual market values may fluctuate materially but may not have been re- valued in the accounts; 	At this stage there are no other matters to report.	
• capital expenditure may		

Risk	Progress and issues noted	Remaining action
 not be accurately allocated between enhancing and non-enhancing; and newly established Academy schools may not have been correctly treated in the accounts. Provision for Equal Pay Elevated risk • 	We have updated our understanding of the Council's arrangements for managing these	We will perform final accounts audit procedures including:
As in previous years, the Authority is expected to include a provision in the accounts to reflect its liability for Equal Pay and back pay claims. Over the last five years the Authority has received notification of employment tribunal claims against the Authority alleging breach of Equal Pay legislation. The Authority has engaged Solicitors to provide legal advice and conduct proceedings on behalf of the Authority in relation to these claims. On the basis of the advice provided and the information available the Authority concluded on what it felt was the most probable liability as at 31 March 2013. That provision figure reflected known claims	arrangements for managing these matters through discussion with key officers. The Section 151 Officer has kept us updated on developments regarding the Council's efforts to settle its outstanding equal pay liabilities. We have reviewed the Council's draft accounting policies with respect to the recognition of related expenditure and the measurement and valuation of related liabilities, and have no concerns to report.	 testing related payments, journal entries and other adjustments in the financial statements to ensure material accuracy and compliance with accounting standards; seeking confirmation from the Council's legal advisors; and review and challenge of assumptions made by the Council regarding relevant case law and the associated implications for the Council's provision.
as well as other potential claims.	We have held regular discussions	Prior to our final accounts
Agresso Elevated risk ●* Your new ledger system is due to go live on the 1 April 2014.	with management to ensure we are fully aware of progress and of any issues affecting system implementation. We note that there have been	audit we will visit the Council to understand, evaluate and validate controls within the new ledger system, specifically within the following domains:
Although the 2013/14 accounts will be prepared using the financial information contained within the old ledger system, we are required to consider post balance sheet date transactions in carrying out our audit work. As a result, in order for us to utilise the information	delays and some difficulties experienced during, and subsequent to, implementation of the new system. This is primarily in respect of the payroll and payments modules Whilst implementation issues are not entirely uncommon with such implementations we met with a number of individuals involved in managing the new system to ensure	 Data transfer from the old to new ledger system; Access control; Computer operations; and Change management. Following on from our recent discussions, we are also to undertake walk-through

Risk	Progress and issues noted	Remaining action
contained within the new system we will need to perform additional procedures during the 2013/14 audit to satisfy ourselves that sufficient IT general controls are in place and are operating effectively within both the new and old ledger system.	that our detailed audit plans are not impacted by the system issues.	testing for individual transactions to confirm that our proposed audit approach will not be affected. Lastly, we plan to perform additional procedures around the completeness and cut-off of year end creditor balances, to respond to the system issues noted around the payments module, to ensure that period end balances are accurate and complete.

* The risk around Agresso implementation has previously been reported to the Audit Committee as a 'normal' risk. Difficulties noted during the implementation process, and concerns about resulting complications during the audit process increase the risk to our audit. This includes the risks that:

- Creditor payments relating to the old financial year that have been paid in the new financial year may not have been correctly accrued. We therefore need to do additional work to identify and test these types of transactions.
- Data may not have been migrated in the new system correctly so we need to do more verification of data transfers.
- We may not be able to reconcile opening balances easily and there may be complications following transactions through from old system to new system so our work may take more time.
- We may experience difficulties accessing specific system reports.

We have therefore increased the risk level to reflect this, and the additional work required in this area.

Update on risks - Other Audit Code responsibilities

Risk	Progress and issues noted	Remaining action
 The Medium Term Financial Strategy (MTFS) and savings requirements The Authority's February 2014 updated MTFS includes £66.7 million of savings proposals over the next five years, of which £32.1 million will need to be delivered in 2013/14 or 2014/15 to prevent recording a budget deficit in 2014/15. After taking into account these savings plans, a projected £59.2 million deficit by 2018/19 still remains. The draft 2014/15 budget is balanced only after the use of £11.8m of General Fund reserves, 	We have gathered the data required to benchmark your key assumptions as contained in your MTFS (such as inflation, growth pressures, council tax and efficiency savings). We have met regularly with the Section 151 Officer, the Strategic Director Delivery and the Chief Executive to discuss the Council's financial position and plans and understood why the Section 151 Officer has concluded that issuing a report under the requirements of Section 114 of the Local Government Finance Act 1988 is not required.	We will complete our benchmarking exercise and analysis and report our benchmark findings to the Section 151 Officer and the Audit Committee. We will continue to monitor your position against budget and your medium term financial plans, and consider the impact on your budgets and plans, going concern position and our audit opinion. We will consider the findings of our detailed year-end testing on the Council's estimates, provisions and journals undertaken as part of our final accounts work, including those impacted by new accounting rules and those that could be impacted by the Agresso system

Risk

leaving that reserve balance below the £10m required in the Council's Reserves Policy. £26.7m of additional savings would need to be made by 2015/16 in order to keep the general fund reserve balance above the Council's own £10m minimum recommended balance.

This represents a significant financial challenge and it is acknowledged that this must be addressed as a matter of urgency.

There are a number of significant risks associated with the MTFS including:

- The uncertainty about how much funding will be received from Government, including future finance settlements;
- Identified savings options may not be achieved;
- Further efficiency savings and cuts may not be identified;
- Spending may exceed budgets and/or income may fall short of budgets;
- The impact of the current economic climate, including increased inflationary pressures and interest rate changes; and
- Demand for services may exceed estimates.

Effectively managing these risks is critical to the Authority's future financial resilience. Consideration of this area will therefore form a key part of our assessment on your arrangements for securing economy, efficiency and effectiveness in the use of Authority resources.

We need to be satisfied that the Council can demonstrate financial resilience over the medium term as well as ensuring that planned expenditure of the Authority in a financial year is not likely to exceed the resources (including sums borrowed) available to it. This looks particularly challenging for 2015/16.

Progress and issues noted

We have reviewed in-year finance reports to identify key issues and considered their impact on budgets and plans.

The robustness of savings plans and response to the projected funding gap significantly factors into our assessment of whether the Council is able to demonstrate financial resilience.

We have reviewed the findings of the recent 'Independent review of process for medium term financial strategy and budget' report by a Local Government Association member. This report is due to be presented in full to a future meeting of the Audit Committee. We have taken comfort from the broadly positive nature of the findings.

We have requested the provision of a range of detailed information covering areas such as:

- Transfers between earmarked and general fund reserves;
- Savings program budgets and historic achievements against budget by scheme; and
- Cash flow forecasts.

We have shared a list of the Audit Commission's 'indicators' of failing to achieve value for money and asked for the Council's self-assessment and supporting evidence for conclusions reached against these indicators. It should be noted that these indicators focus on the 'arrangements' for achieving value for money as well as the resulting outcomes that those arrangements have.

Remaining action

implementation. If any of these findings have a significant impact upon the Council's financial plans we will feedback our findings to you.

We will review the Council's selfassessment against the financial resilience criteria and consider any additional information this provides when reaching our own conclusion.

We will assess how robust and achievable the most significant savings plans are for 2015/16 and beyond and, in doing so, will consider evidence from third parties such as John Bolton's suggestions on what the Council can do to decrease the costs of social care.

We will continue to meet regularly with the Section 151 Officer to discuss the Council's financial position, plans and receive updates to the savings programme and budget risk assessment.

We will make a provisional assessment by early September and communicate this with Officers and Councillors through a separate report. We will continue to monitor this assessment up to the point of issuing our Value for Money (VFM) conclusion at the end of September.

If our assessment results in the view that the Authority is unable to demonstrate financial resilience this will directly impact on our value for money opinion.

If, under the Local Government Finance Act 1988 we conclude that the Council or an officer of the Council is about to take or has begun to take a course of action which, if pursued to its conclusion, would be unlawful and likely to cause a loss or deficiency, we will issue an 'advisory notice'.

We will continue to keep the Audit Commission informed of our programme of work and emerging findings.

3. Audit progress – other updates

Review of the work of Internal Audit

We use the work of your internal auditors to:

- Aid our assessment of the Council's control environment;
- Inform our audit risk assessment and subsequent approach; and to
- Place reliance on the operation of specific controls, where effective and efficient to do so.

In accordance with the Internal and External Audit Protocol, and in order to avoid the duplication of audit work, we have reviewed the work of Internal Audit across a number of key financial systems. Internal Audit report their findings separately to you as part of their progress reports. We have reviewed reports that are relevant to our audit work throughout the financial year.

In completing our work we found that:

- the scope of the work of Internal Audit met our requirements;
- the quality of the work undertaken by Internal Audit was of a good standard;
- the conclusions of Internal Audit were consistent with the work they had completed;
- our re-performance testing (of a sample of work undertaken by Internal Audit) reached the same conclusion in every instance;

For those reviews relevant to our external audit we identified no material control weaknesses.

On the basis of the above we concluded that:

- we are able to place reliance on the work of Internal Audit;
- we are able to place reliance on the controls within the Council's key financial systems; and
- there are no findings which would require changes to our planned audit approach.

We have gained the assurances we needed on the Council's core financial systems. Our final accounts audit approach will therefore continue as planned.

Preparation for the year-end audit

You submitted your draft accounts within the required timescales and we have been provided with copies of the draft statements for our audit. This is no mean achievement given the range of work that the finance team have undertaken in recent months.

We have discussed with management a proposed timetable for the final accounts audit. This includes activities to be undertaken prior to our audit commencing, including:

- completion of our IT audit work around the finance (GL) system;
- initial sample selection for specific areas of our substantive testing; and
- confirmation of the results of management's review of asset base data differences and the impact that this may have on the period end valuation exercise.

Client connect

We have successfully implemented 'Client Connect' for our audit of the Council. This is a secure online database for transfer of audit working papers and helps ensure the timely distribution and update of information between our audit team and management.

Information Technology audit

Our IT audit team visited the Council during April and June 2014 to undertake testing of key controls operating within your IT control environment. Our work includes reviewing access controls in place around IT and finance systems as well as controls which maintain segregation of duties and controls over batch processes.

As noted above, because of some of the issues encountered in implementing your new finance system, we are yet to undertake our IT audit work in respect of your new finance system (this includes the migration of data into Agresso). Following recent discussions with management we are due to visit the Council over the coming weeks to complete this work.

Our IT audit work completed to date has identified no issues and no instances where we need to make significant changes to our planned audit approach.

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.

PwC's Local Government blog

As we move rapidly towards the next general election, all eyes are on ideas that will emerge to deliver good growth, reform government and public services and help lift standards of living. Our blog explores the most pressing challenges being faced in the public sector today, towards 2015 and beyond. You can follow the blog at http://pwc.blogs.com/publicsectormatters/local-government

Over the course of 2014, we're working with IPPR on a research programme to explore what the next decade holds for decentralisation in England:

Decentralisation decade: a new deal for local government

Calls for central government to let go are nothing new. But there is a growing head of steam about the need for decentralisation and devolution in England which is being driven by the needs of the Core Cities, the Scottish independence debate and the need for a new era of public service reform.

Using new surveys and primary research, the new project will weigh the evidence for and against key aspects of decentralisation, particularly in respect of helping achieve growth and tackle economic inequalities; consider the institutional architecture necessary for better sub-national governance; assess what conditions need to be in place to allow for the successful devolution of power; and will outline a programme for change.

We will be holding a series of roundtable discussions in Spring/Summer 2014 and a final report will be launched in September. Please keep an eye on our blog site or get in touch for further details.

The PwC Public Sector Research Centre

The PwC 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. The PSRC can be found at http://www.pwc.com/gx/en/psrc/

Recent publications by the PSRC include:

Redefining Local Government

Prolonged austerity is driving an important shift in local government. The early years of austerity have been characterised by authorities taking action to reduce costs through a range of traditional 'supply side' cost reduction measures. However, given that austere public finances will last well into the next parliament, local government needs to raise its sights and shift beyond traditional cost reduction approaches.

Many authorities are already reaching a tipping point where it is no longer possible to undertake the same activities as before. Local authorities now have to fundamentally redefine their role and purpose.

Local public services need to be viewed in a much more holistic way, with a focus on how multiple organisations, and citizens themselves, can contribute to securing desired outcomes.

This new landscape will require fundamentally different organisational cultures and behaviours to make it successful, along with an intense focus on digital innovation and



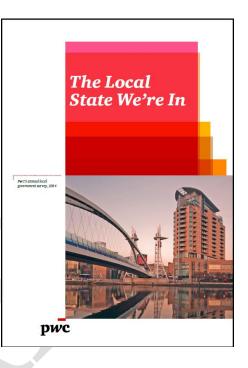
intelligent and insightful data collection and management.

This will be a complex journey. In our latest Talking Points we set out the six steps that will help to create the right foundations to deliver more effectively against this agenda.

The Local State We're In

Over the past few years, local government has demonstrated its ability to deliver ambitious and far reaching savings programmes. While Authority Chief Executives are still holding on to their confidence in meeting savings targets for 2013/14, our third annual local government survey shows that confidence in being able to protect services as well has fallen by 40% over the past year. Beyond 2013/14, confidence in meeting savings targets falls further.

Tough choices are ahead as the cracks begin to show and decisions get closer to the frontline. Authorities need to act urgently to transform themselves into agile organisations and shape a role for themselves through a future of continued austerity



Communities count: making more of social value

The Chartered Institute of Housing, Orbit Group, PwC and Wates Living Space have just published the findings of their jointly commissioned research into the impact of the Social Value Act on commissioning, procurement and contract management in the Housing Sector. The report, covering 123 housing associations and 77 local authorities, identifies four key steps to unlocking social value: defining the vision; integrating across the business, delivering through partnership and measuring the difference.

Communities count provides a timely reminder of both the power and the complexity of social value. Social value comes down to getting the basics right. What do we mean by value, and how can it be integrated and measured in terms that a community and organisation needs, whether that's jobs, wellbeing, skills or crime reduction?



Other items of interest

Local Audit Regulations - Consultation

In January 2014, the Local Audit and Accountability Act received Royal Assent. Secondary legislation is needed to give effect to the new local audit arrangements.

On 19 June a consultation was announced which seeks the views of bodies affected these arrangements and any other interested parties about the content of a large part of the proposed secondary legislation. The consultation began on 20 June and runs for a period of 4 weeks, with responses invited by 18 July 2014.

The specific areas covered by the consultation are:

- Modification of the Act regarding smaller authorities;
- Specification of how collective procurement arrangements could work, if audited bodies choose to join them;
- Account and Audit Regulations; and
- Some matters for drainage boards, charter trustees and some other authorities.

Perhaps the most significant element to bring to the attention of the Audit Committee is confirmation that the government intends to change deadlines from 2017-18 for:

- Councils to produce draft accounts from 30 June to 31 May:
- External audit to complete their work and issue their opinion from 30 September to 31 July.

Accounting update

PwC prepared a 2014 Local Government accounting update for local government finance professionals. This summarises the new accounting requirements that will impact the 2013/14 financial statements.

Although local authority Audit Committee Members are not expected to be financial experts the update should provide Councillors with enough information to help you scrutinise whether the new requirements have been addressed. The 20 minute video and slide session is now available at the following link:

http://www.pwcplayer.com/webcasts/2014_05_local_government_update

Local Government Audit Committee Forum in April 2014

In April 2014 PwC hosted a free forum for Audit Committee Members to meet others with similar roles, share best practice and hear from our expert speakers.

That forum focused on the role and responsibilities of an Audit Committee and the impact that the Local Audit Bill may have on the duties of an Audit Committee.

We are planning a program of similar sessions covering a range of topical issues that will be relevant to Audit Committee Members.

Department for Communities and Local Government	
Local Audit	
Consultation	
	June 2014 Department for Communities and Local Government



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