

Audit and Inspection Plan

May 2007



Audit and Inspection Plan

Halton Borough Council

Audit 2007/2008

External audit is an essential element in the process of accountability for public money and makes an important contribution to the stewardship of public resources and the corporate governance of public services.

Audit in the public sector is underpinned by three fundamental principles:

- auditors are appointed independently from the bodies being audited;
- the scope of auditors' work is extended to cover not only the audit of financial statements but also value for money and the conduct of public business; and
- auditors may report aspects of their work widely to the public and other key stakeholders.

The duties and powers of auditors appointed by the Audit Commission are set out in the Audit Commission Act 1998 and the Local Government Act 1999 and the Commission's statutory Code of Audit Practice. Under the Code of Audit Practice, appointed auditors are also required to comply with the current professional standards issued by the independent Auditing Practices Board.

Appointed auditors act quite separately from the Commission and in meeting their statutory responsibilities are required to exercise their professional judgement independently of both the Commission and the audited body.

Status of our reports to the Council

Our reports are prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission. Reports are prepared by appointed auditors and addressed to members or officers. They 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.

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Introduction

- 1 This plan has been developed by the Relationship Manager and the appointed auditor. It sets out the audit and inspection work that we propose to undertake for the 2007/08 financial year. The plan is based on the Audit Commission's risk-based approach to audit planning and the requirements of Comprehensive Performance Assessment (CPA). It reflects:
 - audit and inspection work specified by the Audit Commission for 2007/08;
 - current national risks relevant to your local circumstances; and
 - your local risks and improvement priorities.
- 2 Your Relationship Manager will continue to help ensure further integration and co-ordination with the work of other inspectorates.
- 3 As we have not yet completed our audit for 2006/07, the audit planning process for 2007/08, including the risk assessment, will continue as the year progresses, and the information and fees in this plan will be kept under review and updated as necessary.

Responsibilities

- 4 We comply with the statutory requirements governing our audit and inspection work, in particular:
 - the Audit Commission Act 1998;
 - the Local Government Act 1999 (best value inspection and audit); and
 - the Code of Audit Practice.
- 5 The Code of Audit Practice (the Code) defines auditors' responsibilities in relation to:
 - the financial statements (including the statement on internal control (SIC)); and
 - the audited body's arrangements for securing economy, efficiency and effectiveness in its use of resources.
- 6 The Audit Commission's Statement of responsibilities of auditors and of audited bodies sets out the respective responsibilities of the auditor and the Council. The Audit Commission has issued a copy of the Statement to every audited body.
- 7 The Statement summarises where the different responsibilities of auditors and of the audited body begin and end, and our audit work is undertaken in the context of these responsibilities.

Inspection

- 8 The Audit Commission's CPA and inspection activity is underpinned by the principle of targeting our work where it will have the greatest effect, based upon assessments of risk and performance.
- 9 The Council's CPA category is therefore a key driver in the Commission's inspection planning process. For CPA 2006, the Council was categorised as 4 stars.
- 10 We have applied the principles set out in the CPA framework, *CPA – the Harder Test*, recognising the key strengths and areas for improvement in the Council's performance.
- 11 Strengths in the Council's performance include:
 - Making a significant contribution to wider community outcomes by improving access to its services particularly for hard to reach groups and by initiatives to improve access to employment.
 - Improving service performance in areas identified as priorities for example, increasing the number of older people able to live at home, and has maintained performance in services already described as excellent such as Housing Benefits.
 - Having good systems of financial control and maintaining expenditure within existing resources.
- 12 Action is needed:
 - to make a success of the Local Area Agreement particularly in connection with those elements designed to address health inequalities in Halton; and
 - to ensure that effective financial, performance and governance arrangements are in place for all the Council's joint working arrangements with partners.
- 13 On the basis of our planning process we have identified where our inspection activity will be focused for 2007/08 as follows.

Table 1 Summary of inspection activity

Inspection activity	Reason/impact
Relationship Manager (RM) role	To act as the Commission's primary point of contact with the Council and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders.

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Inspection activity	Reason/impact
Direction of travel (DoT) assessment	An annual assessment, carried out by the RM, of how well the Council is securing continuous improvement. The DoT label will be reported in the CPA scorecard alongside the CPA category. The DoT assessment summary will be published on the Commission's website.
Corporate assessment	We will carry out a corporate assessment in line with the processes set out in <i>CPA - the Harder Test</i> . Our approach will be a combined corporate assessment and Joint Area Review which will include an inspection of services for children and young people.

Work under the Code of Audit Practice

Financial statements

- 14 We will carry out our audit of the financial statements in accordance with International Standards on Auditing (UK and Ireland) issued by the Auditing Practices Board (APB).
- 15 We are required to issue an opinion on whether the financial statements present fairly, in accordance with applicable laws and regulations and the Statement of Recommended Practice on Local Authority Accounting in the United Kingdom 2007, the financial position of the Council as at 31 March 2008 and its income and expenditure for the year.
- 16 We are also required to review whether the SIC has been presented in accordance with relevant requirements, and to report if it does not meet these requirements or if the SIC is misleading or inconsistent with our knowledge of the Council.

Use of resources

Value for money conclusion

- 17 The Code requires us to issue a conclusion on whether the Council has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources. This is known as the value for money conclusion. The Code also requires auditors to have regard to a standard set of relevant criteria, issued by the Audit Commission, in arriving at their conclusion.
- 18 In meeting this responsibility, we will review evidence that is relevant to the Council's corporate performance management and financial management arrangements. Where relevant work has been undertaken by other regulators we will normally place reliance on their reported results to inform our work.
- 19 We will also follow up our work from previous years to assess progress in implementing agreed recommendations.

Use of resources assessment

- 20 The Audit Commission has specified that auditors will complete a use of resources assessment for 2007/08. The assessment focuses on the importance of having sound and strategic financial management to ensure that resources are available to support the Council's priorities and improve services.
- 21 The work required to arrive at the use of resources assessment is fully aligned with that required to arrive at the auditor's value for money conclusion.
- 22 We will arrive at a score of 1 to 4, based on underlying key lines of enquiry, for each of the following themes:

Theme	Description
Financial reporting	<ul style="list-style-type: none"> • preparation of financial statements • external reporting
Financial management	<ul style="list-style-type: none"> • medium-term financial strategy • budget monitoring • asset management
Financial standing	<ul style="list-style-type: none"> • managing spending within available resources
Internal control	<ul style="list-style-type: none"> • risk management • system of internal control • probity and propriety
Value for money	<ul style="list-style-type: none"> • achieving value for money • managing and improving value for money

- 23** We will report details of the scores and judgements made to the Council. The scores will be accompanied, where appropriate, by recommendations of what the Council needs to do to improve its services.
- 24** The auditor's scores are reported to the Commission and are used as the basis for its overall use of resources judgement for the purposes of CPA.
- 25** To complement our work on the Use of Resources and to support of the Council's priorities for addressing Health Inequalities and Community Cohesion, we are proposing to conduct two pieces of work across all Local Authorities and National Health Trusts in Cheshire and Merseyside. Both are anticipated to span both 2007/08 and 2008/09 and will take approximately 12 days in 2007/08.
- For Health Inequalities; In order to address the challenges it is important that agencies work together to ensure that resources are targeted effectively. We will carry out a review of current arrangements and will build on work carried out in 2005/06. However, the main focus will be on how well agencies across the sub-region are working in collaboration. We will carry out the initial stage in 2007/08 with a view to further work in 2008/09.
 - For Community Cohesion; The Council has identified this as a developing issue and is seeking to provide relevant services for Travellers and migrant workers. Across Cheshire and Merseyside we will carry out a review of current arrangements and compile data from participating bodies in order to establish base- line assessment of our communities from which specific and co-ordinated actions can be derived.

Data quality

- 26** The Audit Commission has specified that auditors will be required to undertake audit work in relation to data quality. This is based on a three-stage approach covering:
- Stage 1 - management arrangements;
 - Stage 2 - completeness check; and
 - Stage 3 - risk-based data quality spot checks of a sample of performance indicators.
- 27** The work at stage 1 will link to our review of the Council's arrangements to secure data quality as required for our value for money conclusion and, together with the results of stage 2, will inform the risk assessment for the detailed spot check work to be undertaken at stage 3. The results of the work at stage 3 will inform the Commission's CPA assessment.
- 28** Our fee estimate reflects an assessment of risk in relation to the Council's performance indicators. This risk assessment may change depending on our assessment of your overall management arrangements at stage 1 and we will update our plan accordingly, including any impact on the fee.

Best Value Performance Plan

- 29** We are required to carry out an audit of your best value performance plan (BVPP) and report on whether it has been prepared and published in accordance with legislation and statutory guidance. We have assumed that there will be no significant changes to the procedures normally followed by the Council for preparing the BVPP, and in particular;
- that best value performance indicators will be collected using the existing system assessment sheets; and
 - that the improvements to governance arrangements for data quality agreed during 2006 will have become embedded across the Council.
- 30** When reviewing the BVPP we will take into account the fact that the performance indicators will reflect the effects of the first full year following the transfer of the housing stock to Halton Housing Trust.

Assessing risks

- 31 The Audit Commission is committed to targeting its work where it will have the greatest effect, based upon assessments of risk and performance. This means planning our audit work to address areas of risk relevant to our audit responsibilities and reflecting this in the audit fees. It also means making sure that our work is co-ordinated with the work of other regulators, and that our work helps you to improve.
- 32 Our risk assessment process starts with the identification of the significant financial and operational risks applying at the Council with reference to:
- our cumulative knowledge of the Council;
 - planning guidance issued by the Audit Commission;
 - the specific results of previous and ongoing audit work;
 - interviews with Council officers;
 - liaison with internal audit; and
 - the results of other review agencies' work where relevant.
- 33 We have not included a risk assessment for our audit of the financial statements as many of the specific risks may not become apparent until after we have completed our 2006/07 audit. We will issue a separate opinion audit plan for our audit of the financial statements in October 2007. At this stage we are aware of the following risks that are likely to impact on our audit of the financial statements:
- the change in accounting policy required by the Code of Practice on Local Authority Accounting in the UK (Statement of Recommended Practice or SORP) for 2006 which comes into force from 1 April 2007 (ie replacement of the fixed asset restatement account and the capital financing account with a revaluation reserve and a capital adjustment account); and
 - the proposals for further changes to the SORP for 2007 to implement in full the requirements of financial reporting standards (FRS) 25, 26 and 29.
- 34 For each of the significant risks identified in relation to our use of resources work, we consider the arrangements put in place by the Council to mitigate the risk, and plan our work accordingly.
- 35 Our initial risk assessment for use of resources work is provided in Appendix 1. This will be updated through our continuous planning process as the year progresses.

Work specified by the Audit Commission

Whole of government accounts (WGA)

- 36 We will be required to review and report on your WGA consolidation pack in accordance with the approach agreed with HM Treasury and the National Audit Office which is proportionate to risk.

National Fraud Initiative

- 37 The Council participates in the National Fraud Initiative which is the Audit Commission's computerised data matching exercise designed to detect fraud perpetrated on public bodies. This work will be carried out by an individual appointed to assist in the audit of the Council's accounts (in accordance with section 3(9) of the Audit Commission Act 1998).

Voluntary improvement work

- 38 We are not proposing to do any voluntary improvement work at Halton Borough Council during 2007/08.

Certification of grant claims and returns

39 We will continue to certify the Council's claims and returns on the following basis:

- claims below £100,000 will not be subject to certification;
- claims between £100,000 and £500,000 will be subject to a reduced, light-touch certification; and
- claims over £500,000 will be subject to a certification approach relevant to the auditor's assessment of the control environment and management preparation of claims. A robust control environment would lead to a reduced certification approach for these claims.

The audit and inspection fee

- 40 The details of the structure of scale fees are set out in the Audit Commission's work programme and fee scales 2007/08. Scale fees are based on a number of variables, including the type, size and location of the audited body.
- 41 The total indicative fee for audit and inspection work included in this audit and inspection plan for 2007/08 is £325,186 which compares with the planned fee of £211,056 for 2006/07 and is distorted by the impact of the forthcoming Corporate Assessment.
- 42 Further details are provided in Appendix 2 which includes a breakdown of the fee; specific audit risk factors; the assumptions made when determining the audit fee, for example, the timeliness and quality of draft accounts presented for audit and the supporting working papers; specific actions the Council could take to reduce its audit and inspection fees; and the process for agreeing any changes to the fee. The fee includes all work identified in this plan unless specifically excluded.
- 43 In addition we estimate that we will charge approximately £90,000 for the certification of claims and returns.
- 44 As indicated in paragraph 2, the audit planning process will continue as the year progresses and it is likely that there will be some changes to our planned work and hence to the indicative fee quoted in paragraph 39 above. Any changes to the fee will be agreed with you.

Other information

The audit and inspection team

- 45 The key members of the audit and inspection team for the 2007/08 audit are shown in the table below.

Table 2

Name	Contact details	Responsibilities
Julian Farmer Relationship Manager and District Auditor	E-mail j-farmer@audit- commission.gov.uk Telephone 01928-523550	As Relationship Manager: The primary point of contact with the authority and the interface at the local level between the Commission and the other inspectorates, government offices and other key stakeholders. As District Auditor: Responsible for the overall delivery of the audit including the quality of outputs, signing the opinion and conclusion, and liaison with the Chief Executive and [audit] committee.
Colette Williams Audit Manager	E-mail c-williams@audit- commission.gov.uk Telephone 01928-523550	Manages and co-ordinates the different elements of the audit work. Key point of contact for the Director of Finance.
Gill Orme Area Performance Lead	E-mail g-orme@audit- commission.gov.uk Telephone 01928-523550	Responsible for the delivery of elements of the use of resources work including the value for money theme of the use of resources assessment.

Independence and objectivity

- 46 We are not aware of any relationships that may affect the independence and objectivity of the District Auditor and the audit staff, which we are required by auditing and ethical standards to communicate to you.

- 47 We comply with the ethical standards issued by the APB and with the Commission's requirements in respect of independence and objectivity as summarised at Appendix 3.

Quality of service

- 48 We are committed to providing you with a high quality service. If you are in any way dissatisfied, or would like to discuss how we can improve our service, please contact the Relationship Manager or District Auditor in the first instance. Alternatively you may wish to contact the North West Head of Operations, Frank Kerkham.
- 49 If we are unable to satisfy your concerns, you have the right to make a formal complaint to the Audit Commission. The complaints procedure is set out in the leaflet *Something to Complain About* which is available from the Commission's website or on request.

Planned outputs

- 50 Our reports will be discussed and agreed with the appropriate officers before being issued to the *Executive Board*.

Table 3

Planned output	Indicative date
Opinion audit plan	31 October 2007
Data quality report	TBC
Interim audit memorandum	30 June 2008
Annual governance report	September 2008
Opinion on the financial statements and value for money conclusion	September 2008 TBC
Final accounts memorandum (to the Director of Finance)	31 October 2008
Use of resources report	31 December 2008
Health Inequalities Work Shop	TBC
Community Cohesion baseline Assessment	TBC
Annual audit and inspection letter	TBC
BVPP report	31 December 2008

Appendix 1 – Initial risk assessment – use of resources

Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor's responsibilities
Failure to deliver a substantial element of the capital programme.	Budget Monitoring and reporting arrangements. A project team set up to manage the project and an Executive Board established to make strategic decisions and monitor progress.	Yes	We will rely on work undertaken as part of the Use of Resources element of the VFM conclusion and work on the accounts, fixed assets accounting and disclosures.	UoR KLOE 2.2 The Council manages performance against budgets.
Failure to replace those funding streams that are scheduled to reduce or are coming to an end.	Monitoring of income and expenditure against budgets linked to the Medium Term Financial Forecast. Included within the Strategic and Corporate Risk Register at March 2007.	Yes	We will rely on work undertaken as part of the Use of Resources element of the VFM conclusion and budgetary control work taken from our opinion audit.	KLOE 2.1 Medium term financial plans, budget and capital programme are soundly based.
Inadequately managed transition to the new waste disposal arrangements against the background of the reducing scope for the use of landfill.	Service planning from 2006-07 identified this risk and established appropriate objectives.	Yes	We will rely on work undertaken as part of the VFM conclusion.	KLOEs 5.1 The council currently achieves VFM & 5.2 The Council manages and improves VFM.
Inadequate Governance arrangements in place for the Pooled Budgets.	Strengthened Governance arrangements for partnership working including a governance checklist. Included in the Corporate and Strategic Risk Register at March 2007.	Yes	We will rely on work undertaken as part of the Use of Resources element of the VFM conclusion and on work from our opinion audit.	UoR KLOEs 2.2, The Council manages performance against budgets, 4.1 The Council manages its significant business risks & 4.2 The Council maintains a sound system of internal control.

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Significant risks identified	Mitigating action by audited body	Residual audit risk	Action in response to residual audit risk	Link to auditor’s responsibilities
Failure to ensure adequate control over changes and adaptations to major IT systems.	Restructuring of IT services to better reflect business needs. Positive response to YB@R survey.	Yes	We will rely on work undertaken as part of the Use of Resources element of the VFM conclusion.	UoR KLOE 4.2 The Council has in place arrangements to maintain systems of internal control.
Failure to identify or comply with new statutory obligations pending appointment of new Council Solicitor.	Allocation of key responsibilities to other members of the management team.	Yes	We will rely on work undertaken as part of the Use of Resources element of the VFM conclusion.	UoR KLOE 4.3 The Council has in place arrangements designed to promote and ensure probity and propriety in the conduct of its business.

Appendix 2 – Audit and inspection fee

- 1 Table 4 provides details of the planned audit and inspection fee for 2007/08 with a comparison to the planned fee for 2006/07.

Table 4

Audit area	Planned fee 2007/08 £	Planned fee 2006/07 £
Audit		
Financial statements	131,976	131,202
Use of resources (including BVPP)	40,571	34,226
Data quality	25,973	26,780
Whole of government accounts	2,692	2,627
National Fraud Initiative	1,050	-
Total audit fee	202,262	194,835
Inspection		
Relationship management	11,062	10,762
Direction of Travel	8,112	5,459
Corporate inspection	103,750	-
Total inspection fee	122,924	16,221
Total audit and inspection fee	325,186	211,056
Certification of claims and returns	90,000	85,000

- 2 The audit element of the proposed Audit Commission fee for 2007/08 is £202,262 which at 12 per cent below the mid-point of the Commission's scale fee is within the normal level of variation specified by the Commission.
- 3 The Audit Commission has the power to determine the fee above or below the scale fee where it considers that substantially more or less work is required than envisaged by the scale fee. The Audit Commission may, therefore, adjust the scale fee to reflect the actual work that needs to be carried out to meet the auditor's statutory responsibilities, on the basis of the auditor's assessment of risk and complexity at a particular body.

- 4 It is a matter for the auditor to determine the work necessary to complete the audit and, subject to approval by the Audit Commission, to seek to agree an appropriate variation to the scale fee with the Council. The Audit Commission expects normally to vary the scale fee by no more than 30 per cent (upwards or downwards). This fee then becomes payable.
- 5 The significant difference between the planned fee for 2007/08 and the fee planned for 2006/07 relates to the Comprehensive Performance Assessment, which will mean that we will not be undertaking any service inspections. There has also been a small shift away from Data Quality work reflecting the lower level of risk, and increase in the Use of Resources work to reflect the risks identified in appendix 1, and the proposed cross cutting work set out in paragraphs 25. In all other areas the fee for 2007/08 reflects changes to current fee rates.
- 6 The fee (plus VAT) will be charged in 12 equal instalments from April 2007 to March 2008.

Specific audit risk factors

- 7 In setting the audit fee we have taken into account the following specific risk factors:
 - The Council faces continued budget pressures; it has recently set the budget for 2007/08 in the light of a challenging Formula Grant allocation of £52.025 million, this compares to a settlement for 2006/07 of £54.671 million. The Council plans growth in service expenditure of £1.246 million which will be matched by savings of £3.67 million.
 - We expect that there will be marked progress on the new Mersey Gateway Bridge scheme. This progress will involve the Council in making decisions and taking actions in areas and activities not previously undertaken.
 - In our report to officers on the outcome 2005/06 Final accounts work, we commented on some significant inconsistencies in the classification of creditors and accruals. The Council took steps to address these inconsistencies but the success or otherwise of these measures will only be determined when the audit of the 2006/07 accounts is complete.

Assumptions

- 8 In setting the fee, we have assumed that:
 - the level of risk in relation to the audit of the financial statements is not significantly different from that identified for 2006/07, you will inform us of significant developments impacting on our audit;
 - internal audit meets the appropriate professional standards;
 - internal audit undertakes appropriate work on all systems that provide material figures in the financial statements in a such manner that we can place reliance it for the purposes of our audit;

- good quality working papers and records will be provided to support the financial statements by 16 June;
 - requested information will be provided within agreed timescales;
 - prompt responses will be provided to draft reports; and
 - additional work will not be required to address questions or objections raised by local government electors.
- 9 Where these assumptions are not met, we will be required to undertake additional work which is likely to result in an increased audit fee. The fee for the audit of the financial statements will be re-visited when we issue the opinion audit plan.
- 10 Changes to the plan will be agreed with you. These may be required if:
- new residual audit risks emerge;
 - additional work is required of us by the Audit Commission or other regulators; and
 - additional work is required as a result of changes in legislation, professional standards or as a result of changes in financial reporting.

Specific actions Halton Borough Council could take to reduce its audit and inspection fees

- 11 The Audit Commission requires its auditors to inform a council of specific actions it could take to reduce its audit and inspection fees. We have identified the following actions the Council could take:
- As has happened in previous years, providing a formal written and evidenced self assessment for the Use of Resources KLOE covering financial management, financial standing, internal control and financial reporting.
 - Internal Audit to continue to audit the key performance indicators (as specified annually by the Audit Commission).

Process for agreeing any changes in audit fees

If we need to make any significant amendments to the audit fee during the course of this plan, we will firstly discuss this with the Chief Executive. We will then prepare a report outlining the reasons why the fee needs to change for discussion with the Executive Board.

Appendix 3 – Independence and objectivity

- 1 Auditors appointed by the Audit Commission are required to comply with the Commission's Code of Audit Practice and Standing Guidance for Auditors, which defines the terms of my appointment. When auditing the financial statements auditors are also required to comply with auditing standards and ethical standards issued by the Auditing Practices Board (APB).
- 2 The main requirements of the Code of Audit Practice, Standing Guidance for Auditors and the standards are summarised below.
- 3 International Standard on Auditing (UK and Ireland) 260 (Communication of audit matters with those charged with governance) requires that the appointed auditor:
 - discloses in writing all relationships that may bear on the auditor's objectivity and independence, the related safeguards put in place to protect against these threats and the total amount of fee that the auditor has charged the client; and
 - confirms in writing that the APB's ethical standards are complied with and that, in the auditor's professional judgement, they are independent and their objectivity is not compromised.
- 4 The standard defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case, the appropriate addressee of communications from the auditor to those charged with governance is the audit committee. The auditor reserves the right, however, to communicate directly with the authority on matters which are considered to be of sufficient importance.
- 5 The Commission's Code of Audit Practice has an overriding general requirement that appointed auditors carry out their work independently and objectively, and ensure that they do not act in any way that might give rise to, or could reasonably be perceived to give rise to, a conflict of interest. In particular, appointed auditors and their staff should avoid entering into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement.

- 6 The Standing Guidance for Auditors includes a number of specific rules. The key rules relevant to this audit appointment are as follows:
- appointed auditors should not perform additional work for an audited body (ie work over and above the minimum required to meet their statutory responsibilities) if it would compromise their independence or might give rise to a reasonable perception that their independence could be compromised. Where the audited body invites the auditor to carry out risk-based work in a particular area that cannot otherwise be justified as necessary to support the auditor's opinion and conclusions, it should be clearly differentiated within the audit plan as being 'additional work' and charged for separately from the normal audit fee;
 - auditors should not accept engagements that involve commenting on the performance of other auditors appointed by the Commission on Commission work without first consulting the Commission;
 - the District Auditor responsible for the audit should, in all but the most exceptional circumstances, be changed at least once every five years;
 - the District Auditor and senior members of the audit team are prevented from taking part in political activity on behalf of a political party, or special interest group, whose activities relate directly to the functions of local government or NHS bodies in general, or to a particular local government or NHS body; and
 - the District Auditor and members of the audit team must abide by the Commission's policy on gifts, hospitality and entertainment.