

Auditor's Annual Report on West Oxfordshire District Council

2020-21

4 August 2022



Contents



We are required under Section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The Code of Audit Practice issued by the National Audit Office (NAO) requires us to report to you our commentary relating to proper arrangements.

We report if significant matters have come to our attention. We are not required to consider, nor have we considered, whether all aspects of the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.



Section	Page
Executive Summary	3
Opinion on the financial statements	4
Commentary on the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources	5
Financial sustainability	6
Governance	14
Improving economy, efficiency and effectiveness	19
Opinion on the financial statements	23
Appendices	
A – The responsibilities of the Council	25
B – An explanatory note on recommendations	26

The contents of this report relate only to those matters which came to our attention during the conduct of our normal audit procedures which are designed for the purpose of completing our work under the NAO Code and related guidance. Our audit is not designed to test all arrangements in respect of value for money. However, where, as part of our testing, we identify significant weaknesses, we will report these to you. In consequence, our work cannot be relied upon to disclose all irregularities, or to include all possible improvements in arrangements that a more extensive special examination might identify. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

Grant Thornton UK LLP is a limited liability partnership registered in England and Wales: No.OC307742. Registered office: 30 Finsbury Square, London, EC2A 1AG. A list of members is available from our registered office. Grant Thornton UK LLP is authorised and regulated by the Financial Conduct Authority. Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. Services are delivered by the member firms. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.

Executive summary



Value for money arrangements and key recommendations

Under the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. We are required to report in more detail on the Council's overall arrangements, as well as key recommendations on any significant weaknesses in arrangements identified during the audit. We have not identified any significant Value for Money (VfM) weaknesses, but have identified seven opportunities for improvement which are set out in detail within our report. We have not had to apply any of our formal auditor's powers. Information on the powers we can deploy are set out at Appendix B.

Criteria	Risk assessment	Finding
Financial sustainability	Risk of significant weakness identified	No significant weaknesses in arrangements identified, but three improvement recommendations made
Governance	No risks of significant weakness identified	No significant weaknesses in arrangements identified, but two improvement recommendations made
Improving economy, efficiency and effectiveness	No risks of significant weakness identified	No significant weaknesses in arrangements identified, but two improvement recommendations made

	No significant weaknesses in arrangements identified.
	No significant weaknesses in arrangements identified, but improvement recommendations made.
	Significant weakness in arrangements identified and key recommendation made.

2020/21 was an unprecedented year in which the Council operated with the majority of its staff home working whilst supporting local businesses and residents through the pandemic. The Council incurred significant cost pressures relating to COVID-19, with early forecasts initially suggesting an £650k impact for 2020/21. The Council have worked hard to manage this position, and have finished the year with a small surplus. There is evidence across the Council of where staff have **been** flexible and adapted to the challenges faced, working in different services or changing working patterns to deliver the best they could for the communities of West Oxfordshire.

Our review of the Council's VfM arrangements for 2020/21 is retrospective by nature, and we note that there has been a significant time lag between the end of that financial year and the timing of this report which is due to finalising our audit of the Council's financial statements for 2020/21. Our VfM findings are summarised below.



Financial sustainability

The Council is operating in an increasingly uncertain financial environment, including annual funding settlements from government. West Oxfordshire, as with all councils, will need to continue to plan during ongoing uncertainty of funding in the medium term.

Despite this uncertainty, and the challenges posed by COVID-19, the Council has maintained a good financial position. The Council has put forward a series of proposals which forecast a balanced budget for the next two years.

Our audit planning identified a significant risk in relation to financial sustainability, but our work has not identified any significant weaknesses in arrangements to secure financial stability at the Council.

Further details can be seen on pages 6-13 of this report.



Governance

Our work this year has focussed on developing a detailed understanding of the governance arrangements in place at the Council and the changes instigated as a response to the pandemic.

Our work on both business as usual governance and adapted governance as a result of the pandemic has not identified any significant weaknesses in arrangements for ensuring that it makes informed decisions and properly manages its risks.

Further details can be seen on pages 14-18 of this report



Improving economy, efficiency and effectiveness

The Council has demonstrated a clear understanding of its role in securing economy, efficiency and effectiveness in its use of resources.

Our work has not identified any significant weaknesses in arrangements in relation to improving economy, efficiency and effectiveness.

Further details can be seen on pages 19-22 of this report.

Opinion on the financial statements

We have completed our audit of the Council's 2020/21 financial statements and issued an unqualified audit opinion on 5 April 2022.

Under International Standards of Audit (UK) (ISAs) and the National Audit Office (NAO) Code of Audit Practice ('the Code'), we are required to report whether, in our opinion:

- the Council's financial statements give a true and fair view of the financial position of the Council and the Council's income and expenditure for the year; and
- have been properly prepared in accordance with the CIPFA/LASAAC code of practice on local authority accounting and prepared in accordance with the Local Audit and Accountability Act 2014.

We are also required to report whether other information published together with the audited financial statements, including the Annual Governance Statement (AGS) and Narrative Report, is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

Our audit work was completed remotely during July to December 2021. Full details of our findings from the audit are detailed in our Audit Findings Report dated 16 November 2021. A small number of remaining queries took some time to resolve due to competing priorities of both officers' time and that of the audit team. We delivered an unqualified opinion on the Council's 2020/21 financial statements on 5th April 2022.

Our work did not identify any material errors or adjustments to the outturn position but did identify a material disclosure error in the classification of reserves. In addition, we also recommended a small number of adjustments to improve the presentation of the financial statements.

The draft financial statements were presented for audit in accordance with the agreed timetable and were supported by working papers of a similar quality to last year. We made two recommendations for the Council as a result of our work on the financial statements, and these are included opposite.

Issue and risk	Recommendations
<p>Disclosures relating to both critical judgements and estimation uncertainty lack the level of detail envisaged by IAS 540 and as described in the most recent FRC thematic review</p>	<p>Given the additional focus on accounting estimates, management should consider working more closely with experts to ensure more detailed disclosures can be provided in relation to both estimation uncertainty and critical judgements.</p> <p>Management Response</p> <p>Disclosures relating to critical judgements and estimation uncertainty were expanded in 2020/21 but will be reviewed again as part of the 2021/22 closedown process to provide more detailed disclosures where appropriate</p>
<p>Our audit testing identified a number of assets recorded in the asset register at nil net book value. While this has no bottom line impact on the accounts, it does suggest that officers need to review the UEL and determine whether they remain appropriate for the assets that are still recorded in the asset register.</p>	<p>Officers to review the assets held in the asset register at nil net book value.</p> <p>Management Response</p> <p>Agreed. We will review the useful economic lives of equipment assets, particularly those close to being fully depreciated to assess whether the asset life and gross value remain appropriate. Given the amounts involved are not material this does not represent a significant risk to the accounts.</p>

Commentary on the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources

All Councils are responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness from their resources. This includes taking properly informed decisions and managing key operational and financial risks so that they can deliver their objectives and safeguard public money. The Council's responsibilities are set out in Appendix A.

Councils report on their arrangements, and the effectiveness of these arrangements as part of their annual governance statement.

Under the Local Audit and Accountability Act 2014, we are required to be satisfied whether the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

The National Audit Office's Auditor Guidance Note (AGN) 03, requires us to assess arrangements under three areas:



Financial sustainability

Arrangements for ensuring the Council can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3-5 years).



Governance

Arrangements for ensuring that the Council makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the Council makes decisions based on appropriate information.



Improving economy, efficiency and effectiveness

Arrangements for improving the way the Council delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



Our commentary on each of these three areas, as well as the impact of COVID-19, is set out on pages 6 to 22 Further detail on how we approached our work is included in Appendix B.

Financial sustainability



We considered how the Council:

- Responded to the financial challenges posed by the Covid-19 pandemic
- identifies all the significant financial pressures it is facing and builds these into its plans
- plans to bridge its funding gaps and identify achievable savings
- plans its finances to support the sustainable delivery of services in accordance with strategic and statutory priorities
- ensures its financial plan is consistent with other plans such as workforce, capital, investment and other operational planning
- identifies and manages risk to financial resilience, such as unplanned changes in demand and assumptions underlying its plans.

As a result of the inherent uncertainty surrounding the funding of local government we identified in the audit plan a risk of significant weakness in relation to financial sustainability.

COVID-19 arrangements

COVID-19 posed a significant challenge to the Council, including to its financial sustainability, as it did to all in the local government sector. The onset of the pandemic made financial forecasting challenging as new periods of national lockdown were announced and additional tranches of government funding support were confirmed during the course of the year. The finance team carried out a full reforecasting exercise, liaising with all business managers. The emphasis for the revenue budget was to identify areas of potential savings and generate income, and create a realistic year-end outturn forecast.

Officers reported the potential impact of COVID-19 on the financial sustainability of the council in May, June and August 2020. At this stage early indications were that there would be an adverse movement of £643k when compared to the original revenue budget for 2020/21. This was largely a result of a reduction in fees and charges income due to the impact of COVID-19 and the restrictions introduced to limit the spread of the virus. Mitigating actions were taken to bring the forecast positions back in line, which included a review of staffing and recruitment activity, a review of discretionary spending and a review of reserves and provisions. We have not identified any evidence of this funding not being used for the purposes intended.

The Council maintained a good oversight of its COVID-19 related costs and income losses during the remainder of the financial year, with forecasts subject to detailed monitoring and scrutiny. The Medium-Term Financial Strategy (MTFS) was reviewed and updated during the year, and quarterly reporting against the budget to Cabinet was maintained throughout the year.

The Council's arrangements have adapted to respond to new risks it faced from 2020/21 onwards in respect of COVID-19 including:

- ICT arrangements: improved technology and cybersecurity. As more officers work from home the Council's ICT team ensured all staff had the equipment and technology they required to work from home and communicate remotely.
- Agile Working: adapted processes and culture to encourage more agile working. An agile working hub was made available on the Publica portal for all staff to access. During the peak of the pandemic staff were redeployed to support vulnerable members of the community. Options on the future use of offices in Witney have been accelerated by home-working during the COVID-19 pandemic.
- Arrangements are in place to monitor and report against various strands of COVID-19 funding, compliance and enforcement spend and various other grants are spent in line with grant conditions and requirements and ensure are appropriate and reasonable.
- Review of future use of the Council Chamber, including consideration of more multifunctional use of the asset to support hybrid meetings.
- In year savings were identified which principally related to printing, postage and consumables, and those created by the move away from paper to electronic communication and the overall impact was a reduction in overhead budget of circa £300k. This represents a 2% reduction in net revenue budget.

In 2020/21 over 1,000 vulnerable residents were contacted by elected members, and over 6,200 shielded resident were called during lockdown. The Council also developed a Community Hub team to work effectively with voluntary sector partners and volunteers.

As part of the Covid Recovery plan the Council committed funds from its 2019/20 surplus to meeting the aims of this Recovery Plan. A further six initiatives have been endorsed and will be pursued when further finance can be assembled or future opportunities arise to recognise these areas of ambition.

Financial sustainability (Cont'd)

COVID-19 arrangements (Cont'd)

At the end of quarter one, the revised forecast suggested a 2020/21 budget shortfall of £1.9m, which equated to 12% of the original budget. As the year progressed and both the impact of the pandemic and government funding support became more certain, the net position reported to members each quarter set out an improved position. In the 17 February 2021 update to Cabinet, the forecast outcome was a balanced budget for 2021/22 with no expectation of a contribution to the General Fund balance.

The most significant impact on the 2020/21 revenue budget was the loss of management fee income from leisure centres, totalling £1.1m, which was partially offset by the government's Sales, Fees and Charges compensation of £750k.

The pandemic led to an employee cost saving of £179k in relation to the environmental services contract with Ubico. This was achieved by:

- utilising fewer agency staff and a reduction of total staff across garden waste, recycling and street cleansing.
- a fuel cost saving of £103k was the result of a significant pandemic related drop in global oil prices rather than a smaller volume of fuel being consumed.
- a £52k saving in tyre costs has been rolled forward and incorporated into the 2021/22 budget along with an £81k saving in vehicle contract and repair costs as these are timing differences due to repairs and maintenance being delayed.

The impact of COVID-19 was recognised as continuing into 2021/22 and the Council put in place multiple covid recovery workstreams to support the recovery of the local economy including encouraging people back to the high street and supporting the re-opening of local businesses.

The most significant on-going risk to the financial sustainability of the Council remains the uncertainty over whether income from discretionary services will return to pre-pandemic levels.

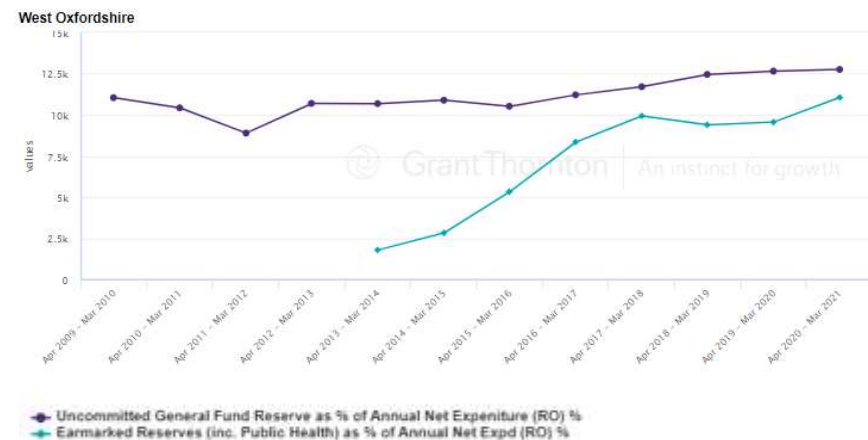
Outturn 2020/21

The Council's 2020/21 budget strategy assumed a balanced budget with a contribution from the General Fund of £1,395k. The outturn position (after transfers to earmarked reserves) was a surplus for the year of £49k. This outturn position reflects the pressures associated with the pandemic, particularly across income generating activities such as leisure services and commercial property income. During the year the Council received significant financial support from the government to fund the impact of the pandemic, which totalled £5m, of which £3.3m was applied during the year, with the balance moved to reserves. In addition to this direct support, the Council received £41.9m of Covid-19 related grants for businesses, of which £36.3m was distributed during the year.

The Council recognised that initial financial plans needed to be adapted as a result of the pandemic, undertaking extensive reforecasting across service lines, including as already noted, identifying and delivering savings of approximately £300k (2% of the net revenue budget).

Reserves

The Council has demonstrated a trend for increasing both earmarked and non-earmarked (uncommitted) reserves in recent years as set out in the table below.



Reserves totalled £118.4m on 1 April 2020, with £79.7m being earmarked and £38.7m non-earmarked. Reserves totalled £112.9m at 31 March 2021, with £66.8m being earmarked and £46.1m non-earmarked. The main elements of the non-earmarked reserves as at 31 March 2021 was £12.8m of General Fund unallocated funds and a further £19.1m of General Fund earmarked funds. The unallocated balance of £12.8m is very healthy in comparison to the Council's statistical nearest neighbours. The earmarked reserves included £7m of section 31 grants that will be applied in 2021/22 to the business rates deficit. Despite this the level of general fund balances and reserves at 31 March 2021 are considered healthy.

Financial sustainability (Cont'd)

Council Tax and Business Rates

During 2020/21 the income from liability orders related to the non-payment of Council Tax underachieved compared to budget by £110,000 due to the Magistrates' Courts being closed for the first half of the year. The Council anticipates that some of this income will be recovered in 2021/22.

The Council is a billing authority and is part of the Oxfordshire pooled business rates arrangement. During 2020/21 collection rates were significantly impacted by COVID-19. As referred to on the previous page, the government provided one-off Section 31 funding of £7m to compensate for lost business rates income due to the pandemic which has been held in earmarked reserves until repayment during 2021/22.

Budget 2021/22 and MTFs

The Council set a balanced budget for 2021/22 with no expectation of a contribution to the General Fund balance. The budget for 2021/22 and for future years was informed by a public consultation exercise concluded in January 2021.

The budget includes provision for the payment of interest on long term loans the Council expects to enter into in 2021/22 which relate to new capital spend that is funded by borrowing, refinancing of existing capital spend that was previously funded by internal borrowing, and loans to fund the investment strategy. The first tranche of which is estimated at £15m in 2021/22. This borrowing, and the repayment of it, is a key factor influencing the MTFs.

The Council's ten-year MTFs covers the period 2020/21 to 2030/31 and was refreshed at the time of setting the 2021/22 budget.

The Council has assumed a reduction to government funding in 2022/23 of £4m and recognise that using reserves is not a long-term solution to the government funding reduction. The 2021/22 budget set out how reserves will be used to fund the gap over the next eight years. The forecast funding gap in 2022/23 is £2.7m, which then reduces over subsequent years, to become a surplus of £127k in 2030/31.

The 2021/22 budget assumes:

- savings of £193k in relation to Publica Group (Support) Limited, a company owned by the Council along with Cotswold District Council, Forest of Dean District Council and Cheltenham Borough Council
- a budget rebasing (reduction) of £89k.
- ongoing income reduction from current income sources due to the pandemic totalling £1.8m.

From 2022/23 the MTFs assumes an increasing level of new income as a result of the Council's investment strategy, totalling £941k in 2022/23 and rising to £2.2m in 2025/26.

The Council recognises that this is a major area of risk in the MTFs as the income from this strategy is pivotal in extending the life of the Council's reserves and closing the gap left by the reduction in government funding. The Council should carefully monitor its investment strategy outcomes to assess whether the actual additional revenue income generated and costs incurred are consistent with those set out in the original business plan. We have made an improvement recommendation for this.

The MTFs estimates replacement government funding for of £1m in 2022/23 and then a total of £1.5m in subsequent years, but accurately estimating actual funding going forward is difficult. The implications of the annual funding settlement for the Council should be assessed with different scenarios considered along with the corresponding action and result on service provision. We have made an improvement recommendation for this.

The Council has incorporated uncertainty into its planning and based the MTFs on a mid-range scenario, having modelling three different scenarios of additional growth pressures. Some of this is being managed by planned savings. Some by a carry forward of COVID-19 funding from 2020/21.

Generally, we find the Council to be well managed financially and there is a high level of understanding of its budgetary position, budgetary pressures and any savings required. There is an established process by which the budget is reviewed regularly, and issues are reported on a timely basis to those charged with governance. We also note that the Section 151 Officer moving back to a full-time role during 2020/21 (having previously been a joint role with Cotswold District Council) providing increased senior finance capacity.

The Council have effective management of investment income and after a sharp drop in both the global Corporate Bond and Equity markets at the outset of the Covid pandemic and the lowering of the Bank of England base rate to 0.1%, investment income was expected to fall short of budget. However, an increase in market confidence later in the year recovered much of the losses on the capital value of our Pooled funds incurred early in the year and additional loans to both Cottsway and Southill Solar brought in additional interest, all crystallised in a reported position at year end which saw performance better the original budget by £117k.

Financial sustainability (Cont'd)

Capital programme

The Council has approved a ten-year capital programme which is aligned to the timescale of the MTFS. There has been a decreasing trend in capital expenditure made by the Council in prior years. The original capital expenditure budget for 2020/21 was set at £20.6m. The majority of the planned expenditure was two loans to Cottsway Housing Association of £1.5m to support the Blenheim Court Growth Deal scheme and £5.9m to support the provision of affordable housing. In addition the Council loaned £2m to Southill Solar in line with the Council's stated priority to take action locally on climate change.

£12m of the 2020/21 capital programme was due to be funded from borrowing with the balance of funding drawn from grants, external funding, earmarked reserves, capital receipts and contribution from revenue.

The capital programme budget was reforecast in year to £16.4m, with a year-end outturn position of £13.3m. The main underspends against the revised forecast were £1.3m relating to affordable housing (partnership with Haylo) and £1.4m relating to Old Court House. £3.6m of the underspend carried forward to 2021/22. Slippage was caused by economic conditions and the impact of Covid-19.

The Council's Capital Financing Requirement (CFR) is £16m but at the time the programme was approved (February 2021) the Council had no external debt, with internal borrowing having been prioritised over external borrowing. The use of borrowing against working capital has resulted in a depletion of internal cash, meaning the Council will now need to fund capital expenditure via external borrowing where external funding and grants are not available.

Planned use of external debt and the scale of the capital programme means that the Council has had to factor in interest repayments into future forecasts and increase its minimum revenue provision (MRP) which has a significant impact on the revenue budget.

Since most of these capital projects do not deliver any return, the Council must repay these loans out of cash generated by other activities. Since working capital has been exhausted, this will require an increasing focus on cashflow management.

The Council has approved an investment strategy framework which would see the Council invest £74m in order to further the Council's priorities, and to generate additional revenue to help close the budget gap and reduce the reliance on general reserves. As already noted, this is a major area of risk in the MTFS.

Bids for new investment are included in the revenue budget and there is a clear justification and rationale. The Council annual funding settlement has been adequately addressed in the financial planning with clear detail of assumptions around council tax and business rate growth based on reasonable analysis.

However the report does not provide much in the way of rationale or justification for new investments, there should be detail on justification and rationale. We have made an improvement recommendation for this.

Savings

Historically, the Council has a strong track record of meeting its financial targets, including savings. During the 2020/21 financial year, the Council undertook an extensive financial reforecasting exercise in an attempt to capture and clarify the effects of the COVID-19 pandemic.

The reforecasting has proven reasonably accurate, reflecting the understanding and control that business managers have over their revenue budgets. Forecasts were reviewed towards the end of the financial year. Savings identified were generally small legacy budget items where departments had been allocated a budget for printing or postage or other small equipment or consumables. Some of this saving has been generated by the move away from paper to electronic communication and the overall impact was a reduction in overhead budget of circa £300k. This represents a 2% reduction in net revenue budget.

Continuity between financial plans and other corporate plans

Given the impact of the pandemic, the Council has had a focus on COVID-19 recovery, and there are a number of distinct recovery streams in place that are linked to the Council Plan. These are time bounded. Initially, officers worked up 12 different projects. Each project leader presented, and then members voted on the schemes they wanted to see implemented, based on the fact that they didn't have the resources to deliver all 12 schemes. Officers were surprised that the scheme that got the greatest number of votes was in relation to climate change.

The 2021/22 budget supports the priority themes set out in the Council Plan which was approved by Council in January 2020, with the priorities being Climate Action, Healthy Towns and Villages, A vibrant District Economy, Strong Local communities, Meeting the Housing needs of our changing population and Modern Council Services and Sustainable Finance.

The Council's workforce plan (as part of 2020-24 Council Plan) aligns with financial plans set out by the Council. The workforce plan outlines the financial challenges faced by the Council and the requirement to deliver savings and efficiencies.

Financial sustainability (Cont'd)

Conclusion

We identified financial sustainability as a significant risk in planning this work. Following our review we are satisfied that the Council has appropriate arrangements in place to ensure it manages risks to its financial sustainability. We have not identified any significant weaknesses.

However, we recognise that the COVID-19 support provided by government will cease and this, combined with the need to manage more significant funding gaps in 2022/23 and 2023/24, will present a bigger challenge for the Council. This includes increased levels of savings required in these years, as well as the inevitable increased strain on services due to the cost of living crisis. Continued close in year monitoring and timely corrective action will be required to ensure savings are delivered and service redesign with partners are successfully implemented

We have identified three improvement recommendations which are set out on the following pages.



Improvement recommendations



Financial sustainability

1 Recommendation	The Council should carefully monitor its investment strategy outcomes to assess whether the actual additional revenue income generated and costs incurred are consistent with those set out in the original business plan.
Why/impact	Generating additional income based on the investment strategy is critical to the medium to long term financial sustainability of the Council. However, the Council's future investment decisions should also be informed by the actual performance (both revenue streams and costs) of those schemes already delivered.
Auditor judgement	New income forecast to be generated by the investment strategy is a key assumption in the MTFS and should have regard to actual performance of earlier schemes.
Summary findings	The Council recognises that this is a major area of risk in the MTFS as the income from the investment strategy is pivotal in extending the life of the Council's reserves and closing the gap left by the reduction in government funding
Management comment	Discussions are already underway to attach appropriate nominal coding to projects in order to report ongoing on outcomes. While capital spend is currently carefully monitored, the Council recognises that more could be done to monitor revenue implications ongoing.



The range of recommendations that external auditors can make is explained in Appendix B.

Improvement recommendations



Financial sustainability

2 Recommendation	The implications of the reduction in the annual funding settlement for the council should be supported by scenario planning that sets out the different responses to different funding reductions on Council activity and spend.
Why/impact	The MTFS assumes some level of replacement government funding but accurately estimating actual funding going forward is difficult. The implications of the annual funding settlement for the Council should be assessed with different scenarios considered along with the corresponding action and result on service provision.
Auditor judgement	Given the uncertainty over future funding the Council should introduced scenario planning so decision makers are fully sighted on the ramifications of different funding outcomes.
Summary findings	The Council have identified that there will be a loss of government funding. The MTFS assumes a level that is far from certain and therefore planning for all eventualities is critical.
Management comment	While a level of sensitivity analysis is done on the MTFS especially acknowledging the areas of highest uncertainty and risk, these could be reported as variants for easier comparison.



The range of recommendations that external auditors can make is explained in Appendix B.

Improvement recommendations



Financial sustainability

3 Recommendation	The Council should ensure continued close in year monitoring and timely corrective action will be required to ensure savings are delivered and service redesign with partners are successfully implemented.
Why/impact	The COVID-19 support provided by government will cease and this, combined with the need to manage more significant funding gaps in 2022/23 and 2023/24, will present a bigger challenge for the Council. This includes increased levels of savings required in these years, as well as the inevitable increased strain on services due to the cost of living crisis.
Auditor judgement	Increased uncertainty and the scale of funding gaps in the MTFS require close in-year monitoring to ensure planned actions to manage the gap are realised.
Summary findings	Reduced funding and increasing cost pressures mean that the Council must deliver planned savings, efficiencies and costs reductions to ensure financial sustainability.
Management comment	This is already in place.



The range of recommendations that external auditors can make is explained in Appendix B.

Governance



We considered how the Council:

- monitors and assesses risk and gains assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud
- approaches and carries out its annual budget setting process
- ensures effectiveness processes and systems are in place to ensure budgetary control
- ensures it makes properly informed decisions, supported by appropriate evidence and allowing for challenge and transparency
- monitors and ensures appropriate standards.

COVID-19 arrangements

Following the onset of the pandemic, a mechanism was put in place to ensure that any key decisions that had to be taken had the informal approval of Cabinet members. Governance arrangements were strengthened in respect of procurement. The COVID-19 arrangements around procurement have been reviewed by Internal Audit, who reported substantial assurance in this area. The strategic risk register has also been updated to ensure Covid-related risks are recorded appropriately, mitigated and monitored.

The Council established a coordinated formal emergency response to COVID-19. A Cabinet Advisory Group (CAG) was established taking place in June 2020 to review the Council's finances during the pandemic. The group fed back to the Cabinet committee in October 2020 with details of the impact COVID-19 (included in a Recovery Plan) and a forecast of how COVID-19 impact would have on the council finance outturn, this was complemented by the Council's key corporate strategy document (The Council Plan 2020-2024). In addition, a phased approach to recovery was to enable West Oxfordshire's recovery plans to link with those of local partners, including the Local Enterprise Partnership (OxLEP) and other Oxfordshire partners who based their own recovery plans on the phased approach.

During 2020/21, the Council distributed a total of £39.5m in covid support grants. The Council's Counter Fraud Manager has overseen every part of the Business Grant distribution and is responsible for the post payment assurance work required by the government. Regular reconciliations have been submitted to the Department of Business Environment and Industrial Strategy (BEIS) and repayments made of unused grant funding where applicable.

The Council embraced the required move to remote working including remote member meetings. Such virtual meetings, we have been advised, has led to improved attendance and member engagement, given the geographical nature of West Oxfordshire.

Managing risk

Part 3 of the Council's Constitution sets out that it is the responsibility of the Audit and General Purposes Committee to provide independent assurance of the adequacy of the risk management framework and the associated control environment, independent scrutiny of the authority's financial and non-financial performance to the extent that it affects the authority's exposure to risk and weakens the control environment, and to oversee the financial reporting process.

There is an annual risk assessment process in place. Departmental teams work up their own annual risk registers feeding into a strategic (Corporate) risk register (CRR). The CRR incorporates some of the highest risks set out in some of the departmental risk registers, as well as including the corporate risks. The CRR is agreed by Cabinet annually. Departmental risk registers are agreed by the relevant Committee, so Cabinet is focused on the strategic risks and only the very high scoring risks from the Departmental risk registers that are included on the CRR.

Each risk is described, attached to controls, scored, RAG rated and assigned to a responsible senior officer. Risks are not mapped to corporate objectives and we have made an improvement recommendation in relation to this.

The risk registers are also reviewed annually by internal audit.

Internal controls

Internal Audit is provided by SWAP Internal Audit Services, a company that is wholly owned by various public sector bodies including the Council. The annual internal audit plan is based on the risk assessment undertaken by SWAP for the Council. The plan provides effective coverage of Council risks, including financial, HR, Revenue and Benefits and Publica. ICT audits are also included in the plan, as well as risk and performance management. There is no evidence of significant gaps in assurance, and the reporting structure and reports give a good overview of whether internal controls are working.

Governance (Cont'd)

Internal controls (cont'd)

SWAP was due to present an internal audit plan covering 2020/21 to the Audit and General Purposes Committee (AGPC) in April 2020. However, due to the COVID-19 outbreak and subsequent lockdown, this Committee was postponed. During the first quarter of 2020/21 much of internal audit focus related to COVID-19, such as supporting business grants administration and a review the request for funding from the Council's leisure services provider. Several 2019/20 audits were also finalised during this period.

A revised plan was presented to AGPC in November 2020 which noted internal audit work during quarter 2 had assisted COVID-19 recovery work as well as commencing assurance work. From quarter 3 SWAP planned to focus on key corporate risks facing the Council and providing assurance on key financial systems.

SWAP's year end update reported they had completed 94% of timetabled planned audits in 2020/21 which compares favourably against a target of 90% with the remaining 6% of work in progress at year end. We note that these figures do not include audits which were deferred or removed from the plan due to the impact of COVID-19, with 11 audits completed of the 33 in the original plan.

Our work found no significant gaps in assurance, and the reporting structure and reports give a good overview of whether internal controls are working. The annual report from SWAP gave a High Reasonable Assurance opinion, with no significant risks identified, and no priority 1 actions raised.

Budget setting and monitoring

The Council produce a cash flow forecast at the start of the year to determine the maximum period for which funds may be lent out and/or to identify times at which amounts will need to be borrowed and how much will need to be borrowed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. The forecast is then updated monthly. Limits on long-term investments are set by reference to the Council's MTFs and cash flow forecast. The Council manage their liquidity risk by ensuring it has adequate short term cash resources, borrowing arrangements, overdrafts, or standby facilities in place. It also utilises cash flow forecasting to give as accurate a picture as possible of daily cash balances.

The Council make several references to plans to manage financial risks in the medium and longer term, as well as the short term. The Council MTFs sets out the specific financial challenges facing the Council over the next four years and how it plans to meet them. The Council also recognise that it is more important than ever to have a long-term Council Plan and Budget given the uncertainty caused by COVID-19. Bridging the funding gap presents a substantial financial risk and will require continuing rigorous review of all areas of the Council's budget.

The Council invests in infrastructure and assets through its Capital Programme to support and promote growth and generate income from key funding streams such as Business Rates, Council Tax and rental income.

The investments the Council is planning are not just to relieve short-term pressures by generating additional sources of income, but to have an environmental, social and economic impact for residents and visitors, and to support economic growth and recovery.

The Council closely monitors its finances with routine reports being reviewed by members on a quarterly basis and remedial action being taken whenever required to offset emerging budget pressures. All savings proposals are regularly reviewed for deliverability and risk assessed by officers throughout the year. The Council also undertake regular reviews of its balance sheet risks and takes appropriate action as necessary.

Strategic directors are responsible for their budgets. Departmental managers provide advice, guidance and challenge to their strategic directors. Their performance reviews are based on this role, not necessarily on achieving budget. Budget holders are expected to understand their budget within the wider context of the Council as a whole and recognise where savings they identify would help the Council achieve its targets (even if that's in another directorate). Budget holders are required to evidence their growth requirements – evidence of how any previous growth has been spent, evidence the cost driver(s) behind that spend and produce the data to support that. Consequently, budget holders are not simply asked to make requests for additional budget, but to set those requests within the context of their own management accounts information.

Consequently there is formal and reasonably sophisticated accountability for budgets, and an understanding of the wider implications of financial performance is a key objective for senior managers and budget holders.

The Council has a Performance Management Framework in place to ensure the Council's progress relating to the six priorities in the Council Plan is measured, monitored and managed. Within the Performance Management Framework there is a section on data quality. This sets out how all Council services will be required to adhere to data quality standards to ensure that reliable information is produced. The data quality standards cover six key areas of: accuracy, validity, consistency, timeliness, relevance and completeness.

There is adequate internal and external engagement in relation to budget setting. Consultation was held with residents, businesses and Town and Parish Councils. Consultation also took place with management from Publica and Ubico, and the Council Overview and Scrutiny Committee

Governance (Cont'd)

Budgetary control

The budget and service performance is reviewed quarterly by Cabinet. The accompanying reports and information supporting the budget identify issues as they arise which will impact the expected outturn. There is a good analysis of risks posed to the achievement of the budget within these reports. Forecasts are subject to a high level of challenge and scrutiny, from Cabinet. The outturn report also identifies reasons for variances.

Financial reporting to Cabinet was strengthened during the year by the new Section 151 Officer, and we have been advised that members have provided positive feedback on the improved format, and feel they have a greater understanding of the Council's financial position. An honest dialogue is encouraged between officers and members, and this has developed in particular during COVID-19, as members have sought to engage more with communities about what is important, and this has given the Council a good understanding of what is happening within the district.

The Budget Report 2020/21, outturn reports and the MTFs do not indicate or discuss alternative proposals or scenarios. It would be helpful for the Council to evidence and discuss alternative proposals and scenarios prior to the budget being agreed. We have made an improvement recommendation in relation to this.

Treasury management

The Council's Treasury Management Strategy is to invest its surplus cash in short-term unsecured bank deposits, short term deposits with HM Treasury's Debt Management Office, instant access accounts with UK banks and money market funds. The annual Treasury Management report is reported to the Finance and Management Overview and Scrutiny committee. Included are reports on investments, externally managed funds and the Council's compliance with prudential indicators.

Leadership and committee effectiveness

The Council's Executive is the Cabinet which is supported by an appropriate committee structure. Senior officers attend the Cabinet and Committees to present reports and are open to questions during Committee meetings.

The Council's Annual Governance Statement (AGS) is compliant with the CIPFA code. An appropriate level of care is taken to ensure the Council's policies and procedures comply with all relevant codes and legislative frameworks.

The Audit and General Purposes Committee demonstrates appropriate challenge of financial and non-financial items. The Committee contains members with financial knowledge to provide appropriate challenge on these items.

Major decisions are made at Cabinet. These are discussed at an Executive level prior to the presentation to Cabinet. The Council requires minuted approval of the Cabinet decisions. The Council Cabinet has appropriate arrangements to monitor and ensure appropriate standards, such as meeting legislative/regulatory requirements and standards in terms of officer or member behaviour (such as gifts and hospitality or declarations/conflicts of interests) are in place and are regularly reviewed.

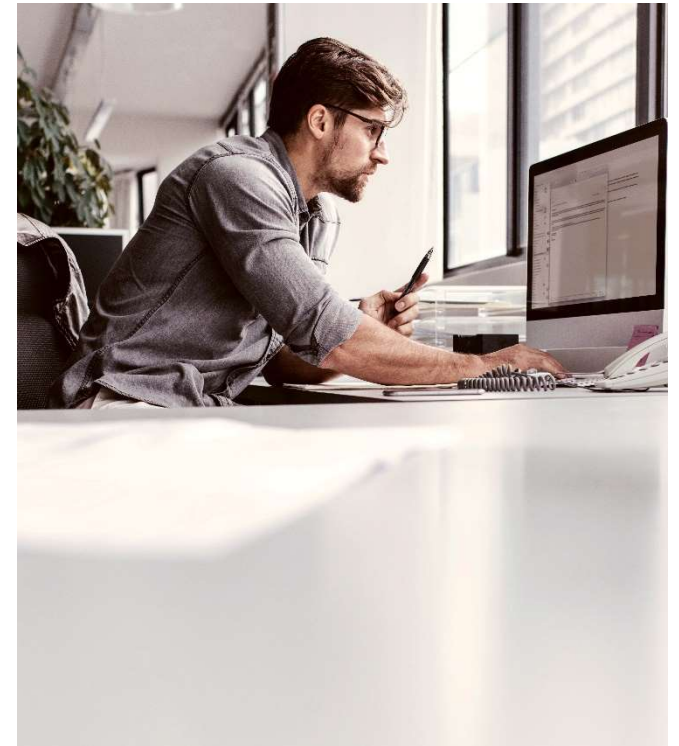
Conclusion

Overall, we found no evidence of significant weaknesses in the Council's arrangements for ensuring that it makes informed decisions and properly manages its risks. We have made two improvement recommendations which are set out on the following pages.

Improvement recommendations

Governance

4 Recommendation	The Council should consider mapping risks to corporate objectives.
Why/impact	For each risk reported to Cabinet (or equivalent), relevant key controls and sources of assurance should be set out and RAG-rated? Adequate evidence that risks are mapped to corporate objectives and allocated to a named senior officer should be detailed.
Auditor judgement	Each risk should be mapped to corporate objectives and this detail included in risk register.
Summary findings	Each risk is described, attached to controls, scored, RAG rated and assigned to a responsible senior officer. Risks are coded, however not mapped to corporate objectives.
Management comment	Risks escalated to the Corporate Risk Register have been identified as strategic and may impact or be related to multiple objectives by their very nature. Some consideration will be given to mapping to test whether it is practical and useful. This recommendation may more closely align with the identification and escalation of strategic opportunities.

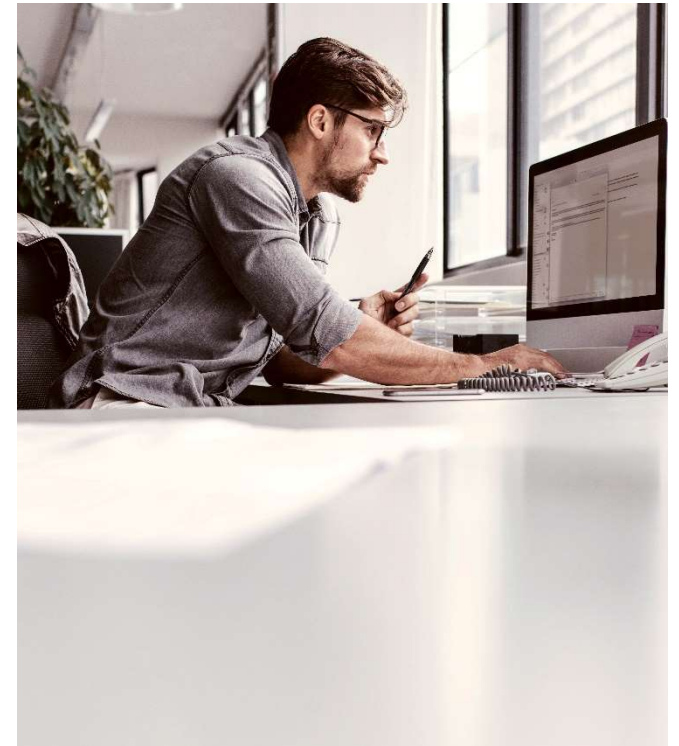


The range of recommendations that external auditors can make is explained in Appendix B.

Improvement recommendations

Governance

5 Recommendation	The Council should consider how it can improve the evidence relating to discussing alternative proposals and scenarios for budget changes prior to the budget being agreed.
Why/impact	Evidence of alternative proposals and scenarios being considered before the final version of the budget is agreed and approved should be evidenced and details of discussion included in minutes.
Auditor judgement	Evidence of discussion of alternative proposals should be included.
Summary findings	A review of the Budget Report 202021, Outturn reports and MTFP does not indicate or discuss alternative proposals or scenarios.
Management comment	The final budget proposals submitted to Council are considered optimal as requests for growth and discussion of underlying initiatives have already gone through Scrutiny committee and Cabinet review. The outturn is a factual report on the closing position of the accounts. Consideration will be given to presenting more scenarios through the MTFs as this forecast may be the appropriate place to evaluate alternative proposals and scenarios.



The range of recommendations that external auditors can make is explained in Appendix B.

Improving economy, efficiency and effectiveness



We considered how the Council:

- uses financial and performance information to assess performance to identify areas for improvement
- evaluates the services it provides to assess performance and identify areas for improvement
- ensures it delivers its role within significant partnerships, engages with stakeholders, monitors performance against expectations and ensures action is taken where necessary to improve
- ensures that it commissions or procures services in accordance with relevant legislation, professional standards and internal policies, and assesses whether it is realising the expected benefits.

COVID-19 arrangements

As a result of the lockdown restrictions announced on the 16th March 2020, the Council moved to ensure that all but a handful of essential staff were able to work from home. This has continued throughout the pandemic, with no significant impact identified on productivity. Following the introduction of regulations to hold formal meetings via remote attendance, committee meetings moved to video conferencing. In the intervening period, some decisions had to be taken by the Chief Executive under delegated powers.

The strategic risk register has also been updated to ensure Covid-related risks are recorded appropriately, mitigated and monitored. A register of Covid-19 risks was managed by Publica on behalf of the Councils with a review of this register undertaken on a weekly basis.

Effective relationships were formed with existing partners and wider relationships developed. Decision making was more streamlined, and the better use of technology meant that issues were resolved quickly. The Council have reflected back on the first 12 months of the pandemic and have used the response to date and progress made as a platform upon which to identify the issues that need to be focused on going forward. Existing plans have been adapted and discussed with a wide range of partners and challenges have been identified to guide the recovery.

Performance management and benchmarking

The Council's Joint Performance and Finance Report demonstrates a robust and detailed reporting mechanism on financial and operational performance, and is good practice. This report includes functionality which makes it interactive and enables performance to be assessed at a Council-wide level and also at a service area level.

The report also benchmarks Council performance against comparator groups and identifies areas for improvement. The performance reporting of the Council operates within a Performance Management Framework to ensure data quality when using this information to assess the Council's performance.

The four-year Council Plan sets out strategic priorities for the period. The Annual Statement and Council Plan are focused on service delivery, and there is a regular high level review of service delivery. The Council's MTFS is over a 10 year period evidencing the body is focusing on longer-term options. The MTFS highlights there are no plans for reductions in services.

Regular reviewing and monitoring of the Council Plan, is achieved using a quarterly report for performance. The is effective use of a Performance Management framework and performance reporting arrangements. The work of partnerships falls within this framework.

Each performance measure is benchmarked against Cotswold and Forest of Dean District Councils, and this data shows areas which hit target and compare against other organisations. The observation analysis for each KPI identifies areas of improvement.

We have undertaken our own benchmarking using 2019/20 Revenue Outturn (RO) data comparing the Council to its ten statistical neighbours. The Council benchmarks very high in terms of its unit costs for the following service blocks: Highways and Transport Services, Environmental and Regulatory Services, and Central Services. The Council should review to determine if there is potential for efficiencies within these service blocks, or they are comfortable with the comparative unit costs due to variations in statistical nearest neighbours' priorities. We have made an improvement recommendation on this.

Improving economy, efficiency and effectiveness

Performance management and benchmarking (cont'd)

This benchmarking highlights that unallocated reserves have remained stable, there has been a steady decrease in total borrowing, and a decrease in both interest payable and in capital expenditure.

When considering the CIPFA Financial Resilience Index to assess how the Council compares to its statistical nearest neighbours in relation to 2021/22 actuals, the Council generally compares favourably and demonstrates comparatively lower risk, including the reserves sustainability measure. The main outlier is the council tax requirement/net revenue expenditure, with the Council having one of the lowest ratios (38.9%) compared to the benchmark group.

Significant partnerships

The Council have a significant partnership with Publica Group (Support) Ltd, a council owned employment company which delivers shared services between Cotswold, West Oxfordshire, and Forest of Dean District Councils and Cheltenham Borough Council. During the course of the year there was a re-set in the relationship between the Council and Publica, and the Council now has a much greater understanding of its role as a shareholder and in managing the Council's interests. Publica retains the confidence of Council officers and members, and working together, saw a responsive redeployment of resources during COVID-19 lockdowns, particularly in relation to grant payments to businesses.

Ubico Ltd, provides waste and recycling, grounds maintenance and street cleaning services on behalf of the Council. The Environmental Services Innovation Programme (ESIP) sets out how the Council will work with Unico Ltd to deliver new, more efficient and modern services. ESIP is also expected to improve transparency on how Ubico operates including reporting finance and performance information; opening shareholders events to all Council members; and how risks are managed, and the recruitment of independent non-executive directors, including an independent chair. As previously noted, the pandemic led to an employee cost saving of £179k in relation to the environmental services contract with Ubico.

Our review found evidence that strategies developed at a partnership level are translated into meaningful actions to be delivered, for example West Oxfordshire Community Safety Partnership (WOCSP) brings together local organisations with a shared goal of creating safer communities in which to live, work and visit. The approach is informed by strategic priorities in the Police and Crime Plan for Thames Valley. Part of the output of this partnership is the Strategic Intelligence Assessment for Oxfordshire which highlights crime data and comparisons with similar areas.

The community safety plan includes data which identifies the issue, the need, activity required, outcome, impact and by who. For example the issue of Domestic Abuse, highlighting more victims will be able to get help, and the impact being a greater number of people being able to access services within West Oxfordshire.

The work of partnerships is fed back to and overseen by the Cabinet in order to maintain overall decision-making responsibility for matters affecting the body. This is done via ad hoc reports to the Council, regarding partnerships, but also by reviewing and monitoring of the Council Plan.

The Council had a shared management arrangement with Cotswold District Council, including shared Section 151 and Monitoring Officer roles. During 2020/21 both councils agreed to change these arrangements and create separate roles for these statutory officers, reflecting a recognition of the need to provide greater capacity for each council. The Council's Section 151 Officer commenced their role in June 2020.

Procurement of services

Every contract entered into by the Council shall comply with all relevant statutory provisions including codes and statutory guidance e.g. Local Government Transparency Code and the Council's Constitution including these Contract Rules, the Council's Financial Rules and Scheme of Delegation and the Authority's strategic objectives, Procurement Strategy, Procurement Code (which includes template documentation) and Climate Emergency policies. The policy of the Council, and the objective of these Contract Rules, is to ensure that all works, goods and services are obtained with probity and propriety to ensure the proper expenditure of public funds; are appropriate for the purpose for which they are obtained and ensure Best Value for Money. Currently an out of date procurement strategy is in place, we found also no information available regarding significant contracts, including their timing for renewal, or financial procedures, although there is a spreadsheet detailing significant purchases. This is evidence of a potential lack of transparency. The Council should consider the creation of a procurement strategy, along with publication of major contracts in place and financial procedures. We have made an improvement recommendation for this.

Conclusion

Overall, we found no evidence of any significant weaknesses in the Council's arrangements in relation to improving economy, efficiency and effectiveness. We have made two improvement recommendations which are set out on the following pages.

Improvement recommendations



Improving economy, efficiency and effectiveness

6 Recommendation	The Council should consider the creation of a procurement strategy, along with publication of major contracts in place and financial procedures.
Why/impact	The body should have an up to date agreed procurement strategy which is complimented by evidence of the body operating a fair procurement exercise for a significant contract, and to also have a clear timeline of contract renewal dates to support procurement planning.
Auditor judgement	Potential lack of transparency and planning.
Summary findings	There is no procurement strategy in place. There is also no information available regarding significant contracts, or financial procedures, although there is a spreadsheet detailing significant purchases.
Management comment	The procurement strategy is being further developed to improve information on contracts, including renewal dates.



The range of recommendations that external auditors can make is explained in Appendix B.

Improvement recommendations



Improving economy, efficiency and effectiveness

7 Recommendation	To undertake a review of 2020/21 Revenue Outturn data to understand variances in unit costs with statistical neighbours.
Why/impact	To identify why the Council, for some service blocks, has very high comparative unit costs, to determine if there is any potential for savings and efficiencies beyond those already planned.
Auditor judgement	To ensure that the Council has considered all potential for additional savings and efficiencies, given the ongoing and significant financial challenges over the medium-term.
Summary findings	Our analysis of 2020/21 RO data has highlighted variances in unit costs between the Council and its nearest statistical neighbours. It will be important for the Council to understand the reasons for these variances.
Management comment	We will look into this.



The range of recommendations that external auditors can make is explained in Appendix B.

Opinion on the financial statements



Audit opinion on the financial statements

We gave an unqualified opinion on the 2020/21 financial statements on 5 April 2022

Audit Findings Report

More detailed findings can be found in our Audit Findings Report, which was published and reported to the Council's Audit and General Purposes Committee on 16 November 2021.

Whole of Government Accounts

To support the audit of the Whole of Government Accounts (WGA), we are required to review and report on the WGA return prepared by the Council. This work includes performing specified procedures under group audit instructions issued by the National Audit Office.

These instructions have yet to be issued and as such we cannot complete this work or formally certify the closure of the audit.

Preparation of the accounts

The Council provided draft accounts in line with the national deadline and provided a reasonable set of working papers to support it.

Issues arising from the accounts:

The key issues were:

- We identified no material errors or adjustments to the outturn position but did identify a material disclosure error in the classification of reserves.
- In addition, we also recommended some adjustment to improve the presentation of the financial statements.
- We raised two recommendations for officers to consider in the preparation of the 2021/22 financial statements.

Grant Thornton provides an independent opinion on whether the accounts are:

- True and fair
- Prepared in accordance with relevant accounting standards
- Prepared in accordance with relevant UK legislation.



Appendices

Appendix A - Responsibilities of the Council



Role of the Chief Financial Officer (or equivalent):

- Preparation of the statement of accounts
- Assessing the Council's ability to continue to operate as a going concern

Public bodies spending taxpayers' money are accountable for their stewardship of the resources entrusted to them. They should account properly for their use of resources and manage themselves well so that the public can be confident.

Financial statements are the main way in which local public bodies account for how they use their resources. Local public bodies are required to prepare and publish financial statements setting out their financial performance for the year. To do this, bodies need to maintain proper accounting records and ensure they have effective systems of internal control.

All local public bodies are responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness from their resources. This includes taking properly informed decisions and managing key operational and financial risks so that they can deliver their objectives and safeguard public money. Local public bodies report on their arrangements, and the effectiveness with which the arrangements are operating, as part of their annual governance statement.

The Chief Financial Officer (or equivalent) is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Chief Financial Officer (or equivalent) determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Chief Financial Officer (or equivalent) or equivalent is required to prepare the financial statements in accordance with proper practices as set out in the CIPFA/LASAAC code of practice on local authority accounting in the United Kingdom. In preparing the financial statements, the Chief Financial Officer (or equivalent) is responsible for assessing the Council's ability to continue as a going concern and use the going concern basis of accounting unless there is an intention by government that the services provided by the Council will no longer be provided.

The Council is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.



Appendix B - An explanatory note on recommendations

A range of different recommendations can be raised by the Council's auditors as follows:

Type of recommendation	Background	Raised within this report	Page reference
Statutory	Written recommendations to the Council under Section 24 (Schedule 7) of the Local Audit and Accountability Act 2014. A recommendation under schedule 7 requires the Council to discuss and respond publicly to the report.	No	n/a
Key	The NAO Code of Audit Practice requires that where auditors identify significant weaknesses as part of their arrangements to secure value for money they should make recommendations setting out the actions that should be taken by the Council. We have defined these recommendations as 'key recommendations'.	No	n/a
Improvement	These recommendations, if implemented should improve the arrangements in place at the Council, but are not a result of identifying significant weaknesses in the Council's arrangements.	Yes	Financial Sustainability (pp 11-13) Governance (pp 17 & 18) 3Es (pp 21 & 22)



[grantthornton.co.uk](https://www.grantthornton.co.uk)

© 2022 Grant Thornton UK LLP.

'Grant Thornton' refers to the brand under which the Grant Thornton member firms provide assurance, tax and advisory services to their clients and/or refers to one or more member firms, as the context requires. Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. GTIL and each member firm is a separate legal entity. Services are delivered by the member firms. GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions.